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REDACTED

July 29, 2024

Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard, Suite 152
Tallahassee, FL 32399-0850

Re: Petition for Expedited Review

Dear Mr. Teitzman:

Enclosed for filing is the Petition for Expedited Review of Somos, Inc.'s denial of an application for numbering resources for the Daytona Beach rate center by MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon).

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Verizon hereby makes a claim of confidentiality for information contained in Exhibit 1 attached to the Petition. Exhibit 1 concerns a customer request for the assignment of telephone numbers that Verizon regards as confidential. One copy of the confidential information is enclosed in a sealed envelope.

If there are any questions regarding this filing, please contact me at 404-291-6252.

Sincerely,

Dulaney L. O'Roark III

Enclosures

In re: Petition of MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services for Expedited Review of Somos, Inc.'s Denial of Application for Numbering Resources	)))))))	Docket No. Filed:

PETITION OF MCIMETRO ACCESS TRANSMISSION SERVICES LLC D/B/A VERIZON ACCESS TRANSMISSION SERVICES FOR EXPEDITED REVIEW OF SOMOS, INC.'S DENIAL OF APPLICATION FOR NUMBERING RESOURCES

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon) requests that the Commission review the denial by Somos, Inc. (Somos) of Verizon's application for a one thousand block of telephone numbers (Thousand Block) in the Daytona Beach, Florida rate center; overturn that decision; and order that a Thousand Block be assigned to Verizon. In support of this Petition, Verizon states:

PARTIES

1.   Verizon is a competitive local exchange telecommunications company that provides local exchange service and exchange access service in Florida.

2.   Somos serves as the North American Numbering Plan Administrator, which is responsible for administering and managing the numbering resources in pooling areas. See 47 C.F.R. § 52.20(d).

JURISDICTION

3. The Commission has jurisdiction of this matter under Section 364.16(7), Florida Statutes.

BACKGROUND AND REQUEST FOR RELIEF

4. A business customer has requested Verizon to provide 400 consecutive DID telephone numbers in the 386 NPA in the Daytona Beach, Florida rate center. The new telephone lines were requested to complete a site modernization project at the customer's Daytona Beach location. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Verizon does not have 400 consecutive DID telephone numbers that meet the customer's needs, it applied on July 16, 2024 to Somos for a Thousand Block in the Daytona Beach rate center. Verizon's application is included in Exhibit 2.

6. Somos denied Verizon's request on July 16, 2024. The request was denied because Verizon did not meet the FCC's months-to-exhaust and utilization criteria that Somos applies, even though Verizon does not have the numbering resources needed to satisfy its customer's request. The Months-to-Exhaust and Utilization Worksheet is included in Exhibit 2 as is Somos' denial of Verizon's application.

7. The FCC has delegated authority to the Commission to address Somos' denial of a request for numbering resources, stating that "[w]e agree ...

that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources."[1] Moreover, the FCC has determined that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Specifically, states "may grant requests for customers seeking contiguous blocks of numbers."[2]

8.   Based on this authority, the Commission has issued a number of orders addressing denials by Somos and its predecessor that release numbering resources to meet specific customer needs. For example, the Commission ordered NeuStar (which previously had served as the Pooling Administrator) to provide CenturyLink with numbering resources to meet the service requirements of a customer that requested 5,000 consecutive numbers, even though CenturyLink had been unable to satisfy the months-to-exhaust or utilization criteria.[3]

9.   Somos' denial of sufficient numbering resources to Verizon to meet its customer's request is inconsistent with the FCC's position that "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for

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[1] *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 95-116, ¶ 61(2001).
[2] *Id.* ¶ 64.
[3] *Petition for Expedited Review of NXX-X Code Denial*, Docket No. 120041-TL, Order No. PSC-12-0089-PAA-TL (March 1, 2012).

3

want of numbering resources."[4] By refusing to grant numbering resources sufficient to meet the needs of Verizon's customer, Somos is preventing this customer from obtaining the service it wants from the carrier of its choice.

10. Verizon's request for a Thousand Block to meet its customer's request fits squarely within the framework established by the FCC for "safety valve" requests that the Commission is authorized to grant. Verizon respectfully requests that the Commission direct Somos to assign a Thousand Block for the Daytona Beach, Florida rate center so that Verizon can satisfy its customer's request.

WHEREFORE, Verizon respectfully requests that the Commission review Somos' decision to deny Verizon's request for additional numbering resources, overturn that decision, and direct Somos to assign Verizon a Thousand Block in the Daytona Beach, Florida rate center.

Respectfully submitted on July 29, 2024.

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        Alpharetta, GA 30022
        Telephone: 404-291-6252
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        Attorney for MCImetro Access Transmission
        Services Corp. d/b/a Verizon Access
        Transmission Services LLC

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[4] *Numbering Resource Optimization*, Second Report and Order and Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, FCC 00-429, CC Docket No. 99-200, CC Docket No. 96-98, ¶ 61 (2000).

CONFIDENTIAL

EXHIBIT 1

Thousand Block Application

DAYTONA BEACH, Florida Rate Center

386-DAYTONABCH-FL-1987791

Customer Request Letter

EXHIBIT 2

Thousand Block Application

DAYTONA BEACH, Florida Rate Center

386-DAYTONABCH-FL-1987791

Part 1A Thousand Block Application

Months to Exhaust (MTE) Worksheet

Part 3A PA Denial

Tracking Number: **386-DAYTONABCH-FL-1987791**

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

**Individual Block
Request**

Type of
Application: New   Change ^{i} Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name:	**MCIMETRO ACCESS TRANSMISSION SERVICES LLC**
Headquarters Address:	**One Verizon Way**

City: **Basking Ridge**   State: **NJ**   ZIP: **07920**
Contact Name: **Katherine Rafalski**

Contact
Address: **900 Chelmsford Road**

City: **Lowell**   State: **MA**   ZIP: **01851**
Phone: **978-322-2153**   Fax: **978-323-4849**
E-mail: **katherine.rafalski@one.verizon.com**

Pooling Administrator:^{ii}
Contact Name: **Kevin Gatchell**
Contact
Address: **One Tower Center Boulevard, Suite 800**

City: **East Brunswick**   State: **NJ**   ZIP: **08816**
Phone: **925-420-0344**   Fax: **925-420-0377**
E-mail: **kgatchell@nanpa.com**

1.2 General Information:

Check one : No LRN needed _____ LRN needed^{iii}:_____

NPA:__**386**__   LATA:____**456**____   OCN^{iv}:____**7229**____   Parent Company's OCN **7229**

Number of Thousands-Blocks Requested :__**1**__

Switch Identification (Switching Entity/POI^v): ___**DYBHFLMA05Z**___

Rate Center^{vi}:___**DAYTONABCH**___

1.3 Dates:

Date of Application^{vii}:_   Requested Effective Date^{viii}:
07/16/2024   **08/16/2024**

Requested Expedited Treatment? (See Section 8.6) Yes _____ No ___**X**___

    By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

a)   Type of Service Provider :___**CAP OR CLEC**___(LEC, IXC, CMRS, Other)
b)   Primary Type of Service Blocks to be used for :___**Wireline**___
c)   Thousands-Block(s) (NXX-X) assignment preference (Optional) _____
d)   Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any ___
___**Last four digits of the block cannot start with 0 or 9 due to dial plan restrictions.**___
___

e)   If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.
Growth block for rate center : Yes ___**X**___If Yes, attach months to exhaust worksheet
    By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.
Type of change (Mark all that apply)
        OCN: Intra-company^{ix}   Switching Id   Part 1B
        OCN: Inter-company^x   Effective Date
Change block : Yes _____If Yes, list NPA-NXX-X _____

1.6 Block Return :

a)   Is this block Contaminated: Yes _____ No _____
b)   If Yes how many TNs are NOT available for assignment :_____

c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____

d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Katherine Rafalski	**Code Adminstrator**	**07/16/2024**
Signature of Block Applicant	Title	Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1   Contact information requires that Service Providers (SP) supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2   Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide[xi]. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3   The date the Service Provider (SP) completes the application should be entered in this section, as well as the Effective Date of the requested Thousands-Block.

Section 1.4   Service Providers (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs may indicate their preference for a particular Thousands-Block, e.g., 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5   Service Providers (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are for additional Thousands-Blocks in a Rate Center in which the Applicant already has Numbering Resources, and provide the required evidence as ordered by the FCC.

Section 1.6   Service Providers (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are

returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, the request for return shall be denied.

The Thousands-Block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

[i]Identify the type of change(s) in Section 1.5.

[ii]The Pool Administrator (PA) is available to assist in completing these forms.

[iii]A Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

[iv]Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

[v]This is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI^{TM} Code of the Switching Entity/POI.

[vi]Rate Center name shall be a tariffed Rate Center.

[vii]Acknowledgment and indication of disposition of this application shall be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

[viii]Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

[ix]Select if you are the current Thousands-Block Holder.

[x]Select if you are not the current Thousands-Block Holder.

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Thousands-Block Months to Exhaust Certification Worksheet - TN Level[1] - Appendix 2
Revised: October 31, 2019
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **386-DAYTONABCH-FL-1987791**

Date: **Tuesday, July 16, 2024**   OCN:**7229**   Company Name:**MCIMETRO ACCESS TRANSMISSION SERVICES LLC**

Rate Center: **DAYTONABCH**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)[2]:**386-363-9,**

Name of Block Applicant:**Katherine Rafalski**   Signature: **Katherine Rafalski**

Title:**Code Adminstrator**   Phone: **978-322-2153-**   Fax: **978-323-4849**

E-Mail: **katherine.rafalski@one.verizon.com**

A. Available Numbers[3]:**909**

B. Assigned Numbers: **80**

C. Total Numbering Resources[4]:**1000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation[5]:**0**

List Excluded Code(s) or Block(s):

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
E. Growth History - Previous 6 months[6]	**0**	**1**	**5**	**61**	**0**	**2**						

F. Forecast -
Next 12
months[7]   **404**   **4**   **4**   **4**   **4**   **4**   **4**   **4**   **4**   **4**   **4**   **4**

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)[8]:**70.667**

H. Months
to Exhaust[9]   = $\dfrac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

=

-

Block Requested	Available Numbers	Months To Exhaust
1	**909**	**12.863**

I.
Utilization[10]   = $\dfrac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}}$ X 100 =   **8.0**

=

-

Explanation: _____

[1]A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

[2]List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

[3]The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

[4]The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

[5]Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

[6]Net change in Telephone Numbers (TN) no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

[7]Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

[8]This field is automatically calculated and populated on this form in PAS.

[9]This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

[10]This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

Pooling Administrator's Response/Confirmation - Part 3A
Revised: October 31, 2019

Tracking Number :   **386-DAYTONABCH-FL-1987791**

Date of Application: **07/16/2024**   Effective Date:
Date of Receipt: **07/16/2024**   Date of Response: **07/16/2024**

Service Provider Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC**

(LERG^{TM} Routing Guide[1]) OCN: **7229**

Parent Company OCN: **7229**

NPAC SOA SPID :

Pooling Administrator Contact Information:

Kevin Gatchell   Phone: **925-420-0344**
Signature of Pooling Administrator
Kevin Gatchell   Fax: **925-420-0377**
Name (print)

Email: **kgatchell@nanpa.com**

NPA-NXX or
___ NPA-NXX-X :   _____   Block Assigned:

                                           Block Reserved :

                                           Block Reservation
                                           Expiration Date :

                                           Block/Code
                                           Modified :

                                           Block/Code
                                           Disconnected :

Block Contaminated (Yes or No):

If yes, enter the number of TNs
contaminated (1-1000):

Switch Identification (Switching/POI)[2]:   **DYBHFLMA05Z**

Rate Center: **DAYTONABCH**

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for

the appeals process.

_____

_____ Request Withdrawn.
Explanation:

_____

_____ Assignment Activity Suspended by Administrator.
Explanation:

_____

Remarks:

_____

_____

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[2] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.