



Madeline Warrington
Manager – External Affairs
AT&T External and Legislative Affairs

AT&T Florida
Legislative Affairs
110 E. Carolina Street
Tallahassee, FL 32301
T: 850-228-0231
mw443k@att.com
www.att.com

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COMMISSION
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January 15, 2025

Adam Teitzman, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

Re: Docket No.: 20250027
Petition for Expedited Review of Growth Code Denial by the Number
Pooling Administrator for the Lehighacs Rate Center

Dear Mr. Teitzman:

Enclosed is an original and seven copies of Teleport Communications America, LLC ("TCAL-FL's") Petition for Expedited Review of Growth Code Denial, which we ask that you file in the above captioned *new* docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Madeline Warrington

Attachments

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL 1
- IDM 6
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: January 15, 2025
For the Lehighacrs rate center)

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Teleport Communications America, LLC (TCAL) pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission (“FCC”) Order FCC 00-104, and Florida Public Service Commission (“Commission”) Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NANPA”) denial of TCAL’s request for additional numbering resources in the Lehighacrs rate center. In support of this petition, TCAL states:

PARTIES

1. TCAL is a corporation organized and formed under the laws of the State of New Jersey.
2. NANPA is an independent non-governmental entity, 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 pursuant to Industry Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This provision provides that a carrier may challenge NANPA’s decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. The Lehighacrs rate center is served by only 1 switch (FTMYFLXAXIZ). TCAL owns block 239-674-4, as listed on the Thousand-Block Months to Exhaust (MTE) block form, and 851 available numbers that are out of scope, respectively.

5. On December 19, 2024, TCAL requested 1000 consecutive numbers in NPA 239. See Attachment 1.
6. At the time of the request, the Lehighacrs rate center month-to-exhaust is 4.863 months and utilization is 14.600%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for the Lehighacrs exchange is attached. See Attachment 2. Pursuant to Commission Order No PSC-01-1973-PCO-TL the customer contact information is attached. See Attachment 3.
7. On December 19, 2024, NANPA denied TCAL's request because TCAL had not met the utilization threshold, notwithstanding the fact that TCAL is unable to provide the numbering resources requested by the specific customer. See Attachment 1.
8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).
9. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have the specific number format to meet the customer's specific request. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.
10. TCAL requests that the Commission review NANPA's decision to withhold numbering resources on the following grounds:
 - (a) NANPA's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.
 - (b) As a result of NANPA's denial of the request for additional numbering resources, TCAL is unable to provide telecommunications services to its customer as required under Florida law.

WHEREFORE, TCAL requests:

1. The Commission review the decision of NANPA to deny TCAL's request for additional numbering resources for the Lehighacrs rate center; and
2. The Commission direct NANPA to provide the requested numbering resources for the Lehighacrs rate center as discussed above.

Respectfully submitted January 15, 2025.

Teleport Communications America, LLC



Edward (Trey) LaMair
Texas Bar No. 00794133
Senior Legal Counsel
AT&T Services, Inc., Legal Department
816 Congress Ave., Suite 1100
Austin, Texas 78701-2442
737-207-5366
lamair@att.com

Tracking Number: 239-LEHIGHACRS-FL-3030873

Thousands-Block (NPA-NXX-X) and Central Office Code (NPA-NXX) Application - Part 1

Revised: October 28, 2024

Type of Application: New Modification¹ Disconnect

1.0 Applicant Contact Information

Service Provider OCN Name: [REDACTED]
Headquarters Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Contact Name: [REDACTED]
Contact Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Phone: [REDACTED] E-Mail: [REDACTED]

1.1 North American Numbering Plan Administrator²

Contact Phone: 866-623-2282 E-Mail: support@nanpa.com

1.2 General Information

NPA: 239 NXX³: [REDACTED] X⁴: [REDACTED]
LATA: 939 Service Provider OCN⁵: [REDACTED]
OCN Category⁶: CLEC Parent Company OCN: [REDACTED]

Number of Thousands-Blocks Requested: [REDACTED]
Switching Identification (Switching Entity/POI) CO Code⁷: FTMYFLXAX1Z
Switching Identification (Switching Entity/POI) Thousands-Block⁸: FTMYFLXAX1Z
Rate Center⁹: LEHIGHACRS
Homing Tandem Operating Company¹⁰: CENTURYLINK
Tandem Homing CLLI^{TM11}: FTMYFLXA04T

1.3 Dates

Date of Application: 12/19/2024
Requested Effective Date CO Code^{12,13}: 02/17/2025

By selecting this checkbox, I acknowledge that I am requesting an effective date 52 calendar days from the date the Administrator processes the request.

Request Expedited Treatment CO Code: Yes No

Expedite documentation must be provided when is "Request Expedite" = Yes and your company is not its own AOCN.¹⁴

Expedite Explanation:

Requested Effective Date Thousands-Block¹⁵: 02/17/2025

By selecting this checkbox, I acknowledge that I am requesting an effective date 24 days from the date the Administrator processes the request.

Request Expedited Treatment Thousands-Block: Yes No

1.4 Thousands-Block/CO Code Information

CO Code Assignment Preference:

CO Codes that are Undesirable, if any: 666

Code Applicant Responsibility

It is the Code Applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum activation interval for BIRRDS will not begin until input into BIRRDS has been completed.

Thousands-Block(s) Assignment Preference: 239-XXX-6

Thousands-Block(s) that are Undesirable, if any:

By selecting this checkbox, I acknowledge that I am willing to accept a Thousands-Block where the underlying CO Code may not yet be activated in the PSTN and loaded in the NPAC on the Thousands-Block effective date.¹⁶

1.5 Type of Request (Initial or Growth)

Initial Thousands-Block and/or CO code for the rate center: Yes

If yes, attach evidence of authorization and proof of capability to provide Service within 60 days.

Growth Thousands-Block and/or CO Code for the rate center: Yes

If yes, attach months to exhaust worksheet.

Pool Indicator¹⁷: Yes No

Update BIRRDS/LEGR¹⁸: Yes No

1.6 Modification

- | | | |
|---|---|---|
| <input type="checkbox"/> OCN: Intra-Company ¹⁹ | <input type="checkbox"/> Switching Id | <input type="checkbox"/> Tandem Homing CLLI |
| <input type="checkbox"/> OCN: Inter-Company ²⁰ | <input type="checkbox"/> Part 1B | <input type="checkbox"/> Effective Date |
| <input type="checkbox"/> Rate Center | <input type="checkbox"/> Add New ISP Thousands-Block Port | |
-

1.7 Disconnect

Is this Thousands-Block Contaminated: Yes No

If yes, are there over 100 ported TNs: Yes No

If yes, are you exiting the market: Yes No

I acknowledge I have completed all Intra SP ports in the NPAC and protected the Thousands-Block from further assignment.

Comments:

1.8 Certification Statement

I hereby certify that the information on this application 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) posted to the ATIS web site (<http://www.atis.org>) as of the date of this application.²¹

Signature of Applicant: 

Date: 

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

Section 1.0: Contact information requires that Service Providers (SP) supply under "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 phone and e-mail address.

Section 1.2: The SP shall supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the iconectiv[®], LLC LERG[™] Routing Guide²². 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). The Switch Identification (Switching Entity/POI) and for Central Office (CO) Code requests the **Tandem Homing CLLI^{™23}** shall also be entered. Explanations of these terms may be found in the footnotes. In addition, when requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center the number of Thousands-Blocks requested shall be supplied.

Section 1.3: The date the Service Provider (SP) completes the application shall be entered in this section. For Central Office (CO) Code requests the Effective Date of the requested CO Code shall be entered. For

Attachment 1

Thousands-Block requests and CO Code requests for LRN or Pool Replenishment a Pooling Rate Center the Effective Date of the requested Thousands-Block shall be entered.

Section 1.4: For Central Office (CO) Code request, the Service Provider (SP) may indicate their preference for a particular CO Code, e.g., 321-6XX, or indicate any CO Code that may be undesirable, e.g., 321-6XX. When requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center, SPs may indicate their preference for a particular Thousands-Block, e.g., NPA- 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., NPA-321-6XXX.

Section 1.5: Service Providers (SP) indicate the type of request. Initial requests are for first applications for a Thousands-Block and/or Central Office (CO) Code in a Rate Center, Growth applications are for additional Thousands-Blocks and/or CO Codes 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) indicate when the request is for a modification and the type of change. Rate Center and Tandem Homing CLLI changes only apply to Central Office (CO) Codes. Part 1B changes only apply to Thousands-Blocks.

Section 1.7: Service Providers (SP) indicate when the request is for a disconnect. When the request is to disconnect a Thousands-Block, SPs shall also 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 North American Numbering Plan Administrator (NANPA) shall seek a new Thousands-Block Holder.

¹ Identify type and reason for change(s) in Section 1.6.

² The contact information for the North American Numbering Plan Administrator (NANPA) may be located at <https://www.nanpa.com>.

³ The NXX field is required for any Thousands-Block or Central Office (CO) Code modification or disconnect.

⁴ The X field is required for any Thousands-Block modification or disconnect.

⁵ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments and Thousands-Block (NPA-NXX-X) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telecom Routing Administration (TRA) on 732-699-6700.

⁶ Each OCN is categorized to identify the type of company associated with a Company Code / OCN. Such information for a particular OCN is available in the LERGTM Routing Guide (LERG 1 table).

⁷ 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 eleven-character iconectiv[®] Common Language Location Identification (CLLITM) Code of the applicant's Switching Entity/POI. (iconectiv[®] and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of iconectiv[®], LLC.)

⁸ 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 eleven-character iconectiv[®] Common Language Location Identification (CLLITM) Code of the applicant's Switching Entity/POI. (iconectiv[®] and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of iconectiv[®], LLC.)

Attachment 1

- ⁹ Rate Center name shall be a tariffed Rate Center associated with toll billing and in the LERG™ Routing Guide.
- ¹⁰ Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).
- ¹¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.
- ¹² Central Office (CO) Code Applicants should request an effective date that is at least 59 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to Activation of a CO Code. Such arrangements are outside the scope of these guidelines.
- ¹³ Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.
- ¹⁴ When your company is its own AOCN please provide the following in the remarks field: I act as my own AOCN and agree to reduce the input timeframe to [enter days]. When your company is not its own AOCN please provide the AOCN's acknowledgement and agree to reduce the input timeframe to [enter days] and expedite letter from your homing tandem operating company when requesting a new CO Code.
- ¹⁵ 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).
- ¹⁶ In NAS, Thousands-Blocks from CO Codes not activated in the PSTN are identified as Available Pending (AP) on reports.
- ¹⁷ The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling or indicate "No" if the CO Code being requested shall be used for a non-pooled CO Code or a dedicated customer where the Thousands-Block will not be built in BIRRDs.
- ¹⁸ The Applicant shall indicate "Yes" if the Dedicated Customer Central Office (CO) Code being requested, or the Thousands-Block being ISP Thousands-Block Ported, shall be identified as Thousands-Block Number Pooled in BIRRDs/LErg™ and have all 10 Thousands-Block records built. The Applicant shall indicate "No" if the CO Code being requested shall be used as a non-pooled CO Code for a Dedicated Customer or the Thousands-Blocks being ISP Thousands-Block Ported shall not be identified as Thousands-Block Number Pooled in BIRRDs/LErg™ and have all 10 Thousands-Blocks built.
- ¹⁹ Select if you are the current Thousands-Block or Central Office (CO) Code Holder
- ²⁰ Select if you are not the current Thousands-Block or CO Code Holder
- ²¹ The Thousands-Block/Central Office (CO) Code applicant certifies veracity of this form by signing their name, and providing their title and date.
- ²² iconectiv®, LLC and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.
- ²³ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2

Tracking Number: 239-LEHIGHACRS-FL-3030873

Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 1

Revised: October 28, 2024

(worksheet to be used for Requests for Additional Thousands-Blocks and CO Codes for Growth)

Date: 12/19/2024

Service Provider OCN: [REDACTED]

Service Provider OCN Name: TELEPORT
COMMUNICATIONS AMERICA, LLC - FL

Rate Center: LEHIGHACRS

List all CO Codes NPA(s)-NXXs and Thousands-Blocks NPA(s)-NXX-X(s)²: 239-674-4

Name of Applicant: [REDACTED]

Phone: [REDACTED]

E-Mail: [REDACTED]

A. Available Numbers³: [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources⁴: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: [REDACTED]

List excluded CO Code(s) or Thousands-Block(s):

E. Previous 6-month growth history⁶:

Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						

F. Forecast - Next 12 months⁷:

Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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

H. Months to Exhaust⁹:

$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \text{[REDACTED]}$$

Block Requested	Available Numbers	Months to Exhaust
[REDACTED]	[REDACTED]	[REDACTED]

I. Utilization¹⁰:

$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) - Excluded Numbers (D)}} \times 100 = \text{[REDACTED]}$$

Explanation:

¹ A copy of this worksheet is required to be submitted to the North American Numbering Plan Administrator (NANPA) 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 Service Provider 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 Report in NAS and shall automatically populate on this form in NAS. 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 Service Provider 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 NAS and shall automatically populate on this form in NAS. 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 Thousands-Blocks received = 2,000 and 1 CO 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 NAS.

⁹ This field is automatically calculated and populated on this form in NAS. To be assigned an additional Thousands-Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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 NAS. To be assigned an additional Thousands-Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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)).