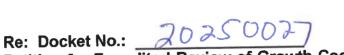Madeline Warrington
*Manager – External Affairs*
*AT&T External and Legislative Affairs*

AT&T Florida
Legislative Affairs
110 E Carolina Street
Tallahassee, FL 32301

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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 Lehighacrs Rate Center**

**CONFIDENTIAL INFORMATION**

Dear Mr. Teitzman:

Teleport Communications America, LLC, ("TCAL-FL") pursuant to Section 364.183(3), Florida Statutes and Rule 25-22.006(5), Florida Administrative Code, hereby makes a claim of confidentiality for certain information contained in Attachments 1-3 to TCAL's Petition for Expedited Review of Growth Code Denial in the above captioned *new* docket.  Attachments 1 - 3 contain confidential and proprietary business information that should be held exempt from public disclosure.  As required by Rule 25-22.006(5), enclosed are the confidential and two redacted copies of each attachment.  Attachment 3 is confidential in its entirety; therefore, a redacted copy is not provided.

The Petition for Expedited Review of Growth Code Denial was also filed on this same day.

NOTE:  If the Commission grants the petition and directs the issuance of the numbers requested, the number sequences can be appropriately disclosed.  The Commission can publish the number sequences requested in the Commission's order when the petition is granted.

Sincerely,

Madeline Warrington

Madeline Warrington

Attachments

COM ___
AFD ___
APA ___
ECO ___
ENG ___
GCL ___
(IDM) _1_ redacted Attach 1
CLK ___

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 ☐ Modification[1] ☐ Disconnect

## 1.0 Applicant Contact Information

**Service Provider OCN Name:** ▮▮▮▮▮▮▮▮

**Headquarters Address:** ▮▮▮▮▮▮

**City:** ▮▮▮ **State:** ▮ **ZIP:** ▮▮

**Contact Name:** ▮▮▮▮

**Contact Address:** ▮▮▮▮

**City:** ▮▮▮ **State:** ▮ **ZIP:** ▮▮

**Phone:** ▮▮ **E-Mail:** ▮▮▮▮

## 1.1 North American Numbering Plan Administrator[2]

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

## 1.2 General Information

**NPA:** 239          **NXX[3]:**          **X[4]:**

**LATA:** 939          **Service Provider OCN[5]:** ▮

**OCN Category[6]:** CLEC                    **Parent Company OCN:** ▮

**Number of Thousands-Blocks Requested:** ▮

**Switching Identification (Switching Entity/POI) CO Code[7]:** FTMYFLXAX1Z

**Switching Identification (Switching Entity/POI) Thousands-Block[8]:** FTMYFLXAX1Z

**Rate Center[9]:** LEHIGHACRS

**Homing Tandem Operating Company[10]:** 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-Block[15]: 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 Indicator[17]: ☒ Yes ☐ No

Update BIRRDS/LERG[18]: ☐ Yes ☐ No

## 1.6 Modification

☐ OCN: Intra-Company[19]     ☐ Switching Id          ☐ Tandem Homing CLLI

☐ OCN: Inter-Company[20]     ☐ Part 1B               ☐ Effective Date

☐ Rate Center                ☐ 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 Guide[22]. 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

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.

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[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 LERG™ 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 (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® 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.)

[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 (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® 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.)

[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

# Administrator's Response/Confirmation - Part 3

**Revised: October 28, 2024**

**Date of Application:** 12/19/2024        **Effective Date:**

**Date of Response:** 12/19/2024

☐ **Request Approved**              ☐ **Request Suspended**

☐ **Request Withdrawn**            ☒ **Request Denied**

**Administrator Comments:**

The Months to Exhaust (MTE) and/or Utilization requirements were not met. This Part 3 denial may be used to request a state waiver from the appropriate state commission.

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.

**NPA, NPA-NXX, NPA-NXX-X:** 239

**Rate Center:** LEHIGHACRS                    **State:** FL

☐ **Assigned**            ☐ **Modified**              ☐ **Disconnected**

**Thousands-Block Contaminated:** ☐ Yes ☐ No

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

☐ **Reserved**                          **Reservation Expiration Date:**

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

**Service Provider OCN:** ▮▮        **OCN Category:** ▮▮

**Parent Company OCN:** ▮▮        **NPAC SPID:**

**Switching Identification (Switching Entity/POI):** FTMYFLXAX1Z

**Tandem Homing CLLI™:** FTMYFLXA04T

**Applicant Contact Name:** ▮▮▮▮▮

**Phone:** ▮▮▮▮▮                    **Email:** ▮▮▮▮▮

**Administrator Contact Name:** John Auerbach

**Phone:** 925-420-0343                **Email:** jauerbach@nanpa.com