

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 18, 2026

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Sakina Deas, Public Utility Analyst IV, Office of Industry Development and Market Analysis *S. D.*

RE: Docket No. 20260077-TA - Petition for expedited review of NXX-X code denial by North American Numbering Plan Administration for the Keys rate center, by Teleport Communications of America, LLC.

Attached is Teleport Communications of America, LLC's corrected petition. Please add to the docket file. If you have questions please contact me at 850-413-6504.

2026 MAY 18 PM 2:43
COMMISSION
CLERK

Sakina Deas

From: WARRINGTON, MADDIE <mw443k@att.com>
Sent: Monday, May 18, 2026 2:23 PM
To: Sakina Deas
Subject: Corrected Petition Keys Rate Center
Attachments: DISA Waiver -Keys FL amend.pdf

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Sakina,

I hope you are well. Please see the attached corrected petition for filing. Please let me know if you need anything else from me.

Best,
Maddie

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: May 7, 2026
For the Keys 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 Keys 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 Keys rate center is served by only 1 switch (MIAMFLGR37Z). TCAL owns blocks 305-307-3, 305-433-9, 305-434-9, 305-676-3 and 786-538-3, as listed on the

Thousand-Block Months to Exhaust (MTE) block form, and 1289 available numbers that are out of scope, respectively.

5. On April 22, 2026, TCAL requested 1000 consecutive numbers in NPA 645. See Attachment 1.
6. At the time of the request, the Keys rate center month-to-exhaust is 7.734 months and utilization is 67.920%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for the Keys 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 April 22, 2026, 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 Keys rate center; and
2. The Commission direct NANPA to provide the requested numbering resources for the Keys rate center as discussed above.

Respectfully submitted April 29, 2026.

Teleport Communications America, LLC



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