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070550

August 1, 2007

Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED - FPSC  
07 AUG - 1 PM 4:35  
COMMISSION  
CLERK

**Re: Petition for the Expedited Review of Growth Code  
Denials by the Number Pooling Administrator for the  
Delray Beach exchange (Kings Point)**

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Expedited Review of NXX-X Code Denial, which we ask that you file in the 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. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Manuel A. Gurdian /RN*  
Manuel A. Gurdian

cc: All Parties of Record  
Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

DOCUMENT NUMBER-DATE

06597 AUG-1 06

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Petition for the Expedited Review of Growth Code Denials**  
**by the Number Pooling Administrator**  
**for the Delray Beach exchange (Kings Point)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail this 1st day of August, 2007 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

NANPA  
Thomas Foley  
NPA Relief Planner  
820 Riverbend Blvd.  
Longwood, Florida 32779-2327  
Tel. No.: (407) 389-8929  
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[thomas.foley@neustar.com](mailto:thomas.foley@neustar.com)

  
Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth ) Docket No.  
Code Denials by the Number Pooling Administrator )  
for the Delray Beach exchange (Kings Point ) Filed: August 1, 2007  
\_\_\_\_\_ )

**PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”), 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 (“NeuStar”) denial of AT&T Florida’s request for additional numbering resources in the Delray Beach exchange. In support of this petition, AT&T Florida states:

**PARTIES**

1. AT&T Florida is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.

2. NeuStar 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 NeuStar's decision to deny numbering resources to the appropriate regulatory authority.

### **BACKGROUND AND REQUEST FOR RELIEF**

4. The Delray Beach exchange consists of three (3) switching entities that utilize numbering resources: Main (DLBHFLMARS0 and DLBHFLMA27E) and Kings Point (DLBHFLKPDS0).

5. On July 25, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Delray Beach Kings Point (DLBHFLKPDS0) switch. See Attachment 1. Specifically, AT&T Florida requested a block to meet the request of a specific customer for 300 numbers in at least blocks of 100.

6. At the time of the code request, the Delray Beach exchange had a MTE of 26.06 and a utilization of 77.66%, while the Kings Point (DLBHFLKPDS0) switch had a MTE of 33.26.

7. On July 25, 2007, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the rate center based MTE criteria, notwithstanding the fact that AT&T Florida is unable to provide the numbering resources requested by the specific customer. See Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Delray Beach exchange and the customer's contact information. See Attachment 2.

8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar'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 a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar nor NANPA looks at the number of MTE and utilization for the entire rate center without exception. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

10. AT&T Florida requests that the Commission reverse NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NeuStar's denial of numbering resources to AT&T Florida interferes with AT&T Florida's ability to serve its customers within the State of Florida.

(b) The MTE at the rate center level requirement is discriminatory against the incumbent LEC, since the ILEC is typically the only local service provider with multiple switches in a rate center. The ILEC deploys multiple switches in a rate center in order to meet customer demand for telephone service. The FCC's rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida believes that it is patently unfair to require that the ILEC only get six (6) MTE in all the switches it has deployed in a rate center, when the CLECs have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

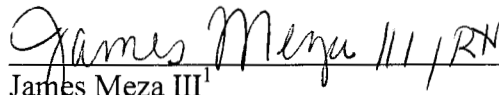
(c) As a result of NeuStar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, AT&T Florida requests:

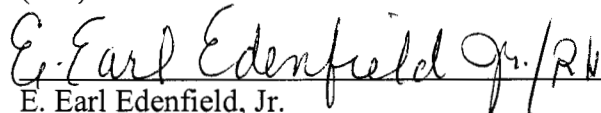
1. The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the Delray Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Delray Beach exchange as discussed above.

Respectfully submitted this 1st day of August, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA

  
\_\_\_\_\_

James Meza III<sup>1</sup>  
Manuel A. Gurdian  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_

E. Earl Edenfield, Jr.  
AT&T Southeast  
675 West Peachtree Street, Suite 4300  
Atlanta, Georgia  
(404) 335-0763

686140

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<sup>1</sup> The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

REDACTED

### Pooling Administration System

[Redacted]@bridge.bellsouth.com (SP)

Sign Out

Part 1A

Type of Application : New

#### 1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

##### Block Applicant :

Company Name **BELLSOUTH SO BELL**

Headquarters Address [Redacted]

City [Redacted]

State [Redacted]

Zip [Redacted]

Contact Name [Redacted]

Contact Address [Redacted]

City [Redacted]

State [Redacted]

Zip [Redacted]

Telephone [Redacted]

Fax [Redacted]

E-mail [Redacted]@bellsouth.com

##### Pooling Administrator #:

Contact Name **Ms Dara Sodano**

Contact Address **1800 Sutter St. Ste. 780**

City **Concord**

State **CA**

Zip **94520**

Telephone **(925) 363-8730**

Fax **(925) 363-7697**

E-mail **dara.sodano@neustar.biz**

#### 1.2 General Information

LRN Needed  No

NPA **561**

LATA \* **480**

OCN <sup>IV</sup>\* **9417-BELLSOUTH SO BELL**

Parent Company OCN \* **9417**

Number of Thousands-  
Blocks Requested **1**

Switch Identification  
(Switching Identity/POI) \* **dlbhf#kpbs0**

City or Wire  
Center Name **DELRAY BEACH**

REDACTED

Rate Center \* DELRAY BEACH

Rate Center Sub Zone

**1.3 Dates**

Date of Application <sup>vii</sup> **Wednesday, July 25, 2007**

Requested Block Effective Date <sup>viii</sup> 25 Aug 2007

Request Expedited Treatment  Yes  No

**1.4 Type of Service Provider Requesting the Thousands-Block**

a) Type of Service Provider \* Incumbent Local Exchange Carrier (LEC)

b) Primary type of service Blocks to be used for \* Wireline

c) Thousands-Block(s) (NPA-NXX-X) assignment preference  
Click here to see the available blocks in the pool.

NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.

d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any

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)

N/A

**1.5 Type of Request**

Initial block for rate center  Yes

Growth block for rate center  Yes

Change block N/A



PROTECTED

Disconnect block N/A

Remarks CUSTOMER HAS SPECIFIC DIALING PATTERNS AND

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines (ATIS-0300066)

Continue

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

Section 1.1 Contact information requires that Service Providers 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 section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>ii</sup>. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider 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 should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth 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.

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

**Foot Notes:**

<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

REDACTED

<sup>v</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code 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).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.

<sup>v</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will 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.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

<sup>ix</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

REDACTED

# Pooling Administration System

[Redacted]@bridge.bellsouth.com (SP)

Sign Out

## Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Wednesday, July 25, 2007**

OCN **9417**

Company Name **BELLSOUTH SO BELL**

Rate Center **DELRAY BEACH**

List all Codes NPA(s)-NXXs and Blocks  
NPA(s)-NXX-X(s)

NPA-NXX
561-243
561-243
561-243
561-243
561-243
561-243
561-243
561-243

Name of Block Applicant [Redacted]  
Title [Redacted]  
Telephone Number [Redacted]  
Fax Number [Redacted]  
E-Mail [Redacted]@bellsouth.com

- A. Available Numbers \* [Redacted]
- B. Assigned Numbers \* [Redacted]
- C. Total Numbering Resources \* [Redacted]
- D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \* [Redacted]

List excluded Code(s) or Block(s)

--

E. Growth History - Previous 6 months<sup>2</sup> \*

5

REDACTED

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

F. Forecast - Next 12 months<sup>3</sup> \*

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

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

H. Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	26.059

I. Utilization<sup>5</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 **77.664**

Explanation



<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup>Net change in TNs 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.

<sup>3</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

<sup>5</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

ATTACHED

## Pooling Administration System

[REDACTED]@bridge.bellsouth.com (SP)

[Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

### Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

**Delray Beach  
Utilization Summary  
Report**

**Attachment 2**

*[Faint, illegible text]*

<b>Exchange</b>	<b>Central Office</b>	<b>Wire Center CLLI</b>	<b>Blocks</b>	<b>Average Growth</b>	<b>Available TNs</b>	<b>MTE</b>	<b>Util</b>
Delray Beach	Main RS0	DLBHFLMARS0	18	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Delray Beach	Main 27E	DLBHFLMA27E	31	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Delray Beach	Kings Point	DLBHFLKPDS0	75	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Customer Contact Information**

[REDACTED]