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COMMISSION
CLERK

RECEIVED-FPSC

November 29, 2007

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

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the West Palm Beach exchange (Gardens)

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.

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 1 _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH _____

cc: All Parties of Record
Jerry D. Hendrix
Lisa S. Foshee
E. Earl Edenfield, Jr.

Sincerely,

Manuel A. Gurdian

DOCUMENT NUMBER-DATE

10591 NOV 29 07

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code Denials
by the Number Pooling Administrator
for the West Palm Beach exchange (Gardens)

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

First Class U.S. Mail this 29th day of November, 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
Fax. No.: (407) 682-1108
thomas.foley@neustar.com



Manuel A. Gurdian

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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 West Palm Beach exchange (Gardens) Filed: November 29, 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 West Palm 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

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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 West Palm Beach exchange consists of seven (7) central offices and eight (8) switching entities that utilize numbering resources: Gardens (WPBHFLGRDS0), Greenacres (WPBHFLGADS0), Haverhill (WPBHFLHHDS0 and WPBHFLHHR0), Lake Worth (WPBHFLLEDS0), Main Annex (WPBHFLANDS0), Riviera Beach (WPBHFLRB84E), and Royal Palm Beach (WPBHFLRPDS0).

5. On October 3, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Gardens (WPBHFLGRDS0) switch. See Attachment 1. Specifically, AT&T Florida requested two (2) blocks to meet the request of a specific customer for 1,500¹ consecutive numbers in the format of NPA NXX-2 and 3.

6. At the time of the code request, the West Palm Beach exchange had a MTE of 40.53 and a utilization of 74.61%, while the Gardens (WPBHFLGRDS0) switch had a MTE of 18.80.

7. On October 3, 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 utilization based 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

¹ The customer originally requested 1,500 consecutive telephone numbers but later increased the request to 2,000 consecutive telephone numbers.

this Petition is the MTE and utilization rate for each switch in the West Palm 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's 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 West Palm Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the West Palm Beach exchange as discussed above.

Respectfully submitted this 29th day of November, 2007.

AT&T FLORIDA



E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

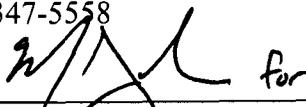
c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558



Lisa S. Foshee

AT&T Southeast

675 West Peachtree Street, Suite 4300

Atlanta, Georgia

(404) 335-0750

697214

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Attachment 1

Pooling Administration System

peggy.wilson@bridge.bellsouth.com (SP)

Sign Out

Request Resources

State

NPA

Rate Center

OCN

Type of Application

Quantity of Blocks Requested

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

peggy.wilson@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]**

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REDACTED

Contact Name	[REDACTED]	
Contact Address	[REDACTED]	
City	[REDACTED]	State [REDACTED]
Zip	[REDACTED]	
Telephone	[REDACTED]	Fax [REDACTED]
E-mail	[REDACTED]@bellsouth.com	
Pooling Administrator ⁱⁱ:		
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 ⁱⁱⁱ	No	
NPA	561	LATA * 460
OCN ^{iv}	9417-BELLSOUTH SO BELL	
Parent Company OCN *	9417	
Number of Thousands-Blocks Requested	2	
Switch Identification (Switching Identity/POI) ^v	WPBHFLGRDS0	City or Wire Center Name WPALMBEACH
Rate Center ^{vi}	WEST PALM BEACH	Rate Center Sub Zone

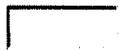
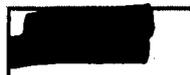
1.3 Dates

Date of Application ^{vii}	Wednesday, October 3, 2007
Requested Block Effective Date ^{viii}	3 Nov 2007
Request Expedited Treatment	<input type="radio"/> Yes <input checked="" type="radio"/> No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider *	Incumbent Local Exchange Carrier (ILEC)
b) Primary type of service Blocks to be used for *	Wireline

REDACTED

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p> <p>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.</p>			
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			
<p>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)</p>			<p>N/A</p>
<p>1.5 Type of Request</p>			
<p>Initial block for rate center <input type="checkbox"/> Yes</p> <p>Growth block for rate center <input type="checkbox"/> Yes</p> <p>Change block N/A</p> <p>Disconnect block N/A</p>			
<p>Remarks <input type="text" value="CUSTOMER REQUESTING 1500 CONSECUTIVE TNS"/></p>			
<p>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)</p>			

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^x. 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. The 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:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} 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).

^v 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™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} 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).

REDACTED

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Pooling Administration System

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

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Wednesday, October 3, 2007**

OCN **9417**

Company Name **BELLSOUTH SO BELL**

Rate Center **WEST PALM BEACH**

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

202	▲
204	□
207	□
233	□
242	□
253	□
304	□
333	□
355	□
357	▼

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

A. Available Numbers * [REDACTED]

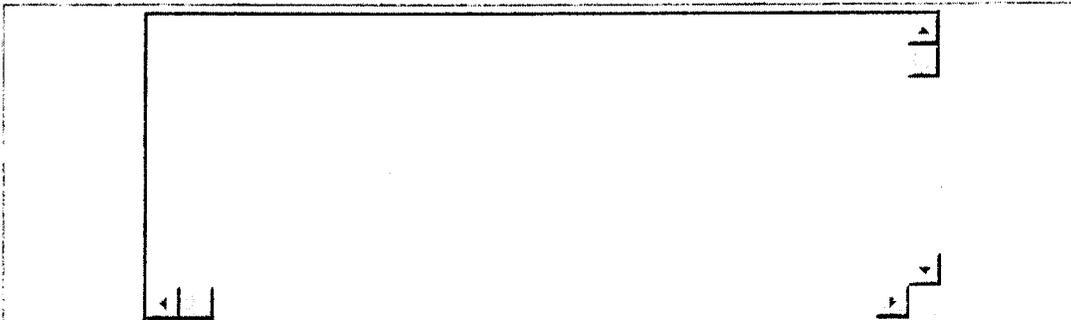
B. Assigned Numbers * [REDACTED]

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)

REDACTED



E. Growth History - Previous 6 months² *

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

F. Forecast - Next 12 months³ *

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 ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	40.283
2	[REDACTED]	40.527

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 74.613

Explanation



REDACTED

¹A 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.

²Net 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.

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

⁴To 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)).

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

Continue

Pooling Administration System

bridge.bellsouth.com (SP)

Sign Out

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

Your utilization calculates to **74.613 percent**. The FCC requires a utilization of **75.000 percent**.

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

Submit

West Palm Beach
Utilization Summary
Report

REDACTED

Exchange	Central Office	Wire Center CLLI	Number Blocks	Avg Growth Per Month	Available TNs	MTE	Utilization
West Palm Beach	Gardens	WPBHFLGRDS0	139				
West Palm Beach	Greenacres	WPBHFLGADS0	178				
West Palm Beach	Haverhill	WPBHFLHHDS0	165				
West Palm Beach	Haverhill	WPBHFLHHR0	10				
West Palm Beach	Lake Worth	WPBHFLLEDS0	83				
West Palm Beach	Main Annex	WPBHFLANDS0	184				
West Palm Beach	Riviera Beach	WPBHFLRB84E	100				
West Palm Beach	Royal Palm Beach	WPBHFLRPDS0	127				

Customer Contact Information

[REDACTED]