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Florida Public Service Commission

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REDACTED COMMISSION CLERK 10250-TX

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Re: Petition for the Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Middleburg Rate Center (JCVLFLCL43Z)

Dear Ms. Cole:

Enclosed is an original and seven copies of SBC Internet Services, Inc. d/b/a AT&T Internet Services' Petition for Expedited Review of Growth Code Denial, which we ask that you file in the captioned docket.

August 12, 2011

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. Gúrdian

cc: All Parties of Record Jerry D. Hendrix Gregory R. Follensbee Suzanne L. Montgomery

COM \_\_\_\_ APA \_\_\_\_ ECR \_\_\_\_ GCL \_\_\_\_ RAD \_\_\_ SSC \_\_\_\_ ADM \_\_\_\_ OPC \_\_\_\_ CLK \_\_\_

DOCUMENT NUMBER-DATE 05730 AUG 12 = FPSC-COMMISSION CLERK

# CERTIFICATE OF SERVICE Petition for the Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Middleburg Rate Center (JCVLFLCL43Z)

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

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First Class U.S. Mail this 12<sup>th</sup> day of August, 2011 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

# **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth ) Code Denial by the Number Pooling Administrator ) For the Middleburg Rate Center (JCVLFLCL43Z)

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Docket No.

Filed: August 12, 2011

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# PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

SBC Internet Services, Inc. d/b/a AT&T Internet Services<sup>1</sup> ("SBC"), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission ("FCC") Orders FCC 00-104 and 05-20, and Florida Public Service Commission ("Commission") Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the Number Pooling Administrator's ("NeuStar") denial of SBC's request for additional numbering resources in the Middleburg rate center. In support of this petition, SBC states:

# <u>PARTIES</u>

1. SBC is a foreign corporation authorized to do business in the State of Florida.

 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.

<sup>&</sup>lt;sup>1</sup> While SBC Internet Services is not a certificated LEC in the State of Florida, it is permitted to obtain numbering resources from the North American Numbering Plan Administrator and/or Pooling Administrator for use in deploying IP-enabled services, including Voice over Internet Protocol (VoIP) services, on a commercial basis to residential and business customers. *See* In the Matter of Administration of the North American Numbering Plan, Order, CC 99-200 (rel. Feb. 1, 2005).

## BACKGROUND AND REQUEST FOR RELIEF

4. The Middleburg rate center consists of two (2) switching entities that utilize numbering resources: Middleburg 1 (JCVLFLCL43Z) and Middleburg 2 (JCVLFLCL30Z).

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5. On July 29, 2011, SBC requested numbering resources from NeuStar for the Middleburg rate center. Specifically, SBC requested a full NXX to provide a Location Routing Number for a new VOIP switch (Middleburg 1 (JCVLFLCL43Z)) in the exchange.

6. On April 19, 2011, SBC notified the Commission that it would be requesting numbers for this switch. See Attachment 1.

7. The company is requesting the numbers be in the format of NPA-NXX-7. SBC will only use one block and return the other 9 blocks to the numbering pool.

8. On July 27, 2011, NeuStar denied SBC's request for additional numbering resources because SBC had not met the utilization based criteria. See Attachment 2.

 At the time of the code request, the Middleburg rate center had a MTE of
 4.28 and a utilization of 21%. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the utilization information. See Attachment 3.

10. 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. <u>See</u> INC Number Pooling Guidelines Sections 3.7 and 12(c).

11. 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.

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12. SBC requests that the Commission's reverse NeuStar's decision to withhold numbering resources from SBC on the following grounds:

(a) NeuStar's denial of numbering resources to SBC interferes with SBC's ability to serve its customers within the State of Florida.

(b) As a result of NeuStar's denial of SBC's request for additional numbering resources, SBC will be unable to implement IP-enabled services that interconnect to the PSTN.

(c) Reversing the decision will enable SBC to deploy innovative new services and encourage the rapid deployment of new technologies and advanced services that benefit Florida consumers.

WHEREFORE, SBC requests:

1. The Commission review the decision of NeuStar to deny SBC's request for additional numbering resources for the Middleburg rate center; and

2. The Commission direct NeuStar to provide the requested numbering resources for the Middleburg rate center as discussed above.

Respectfully submitted this 12th day of August, 2011.

SBC Internet Services d/b/a AT&T Internet Services

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Tracy W. Hatch Manuel A. Gurdian 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5558

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### Attachment 1



Greg Follensbee Executive Director Regulatory Relations

AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301 1561 T: 850.577.5555 F: 850.577-5537 greg.foilensbee@att.com www.att.com

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April 19, 2011

Mrs. Ann Cole Director, Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850

Re: SBC Internet Services, Inc. dba AT&T Internet Services request Numbering Resources Pursuant to Administration of the North American Numbering Plan, FCC Docket No. 99-200, Order, FCC 05-20 (released Feb. 1, 2005)

Dear Mrs. Cole:

Pursuant to the Federal Communications Commission's Docket No. 99-200, which is attached, SBC Internet Services, Inc. dba AT&T Internet Services (ATTIS) hereby notifies this Commission of its intent to request numbering resources for the rate centers listed in the attached Part 1 and/or Part 1A. Under that order, we are required to provide this Commission with this notice before obtaining numbering resources from the North American Numbering Plan Administrator and/or the Pooling Administrator.<sup>1</sup> In addition to filing the attached information with this Commission, we are also submitting this information to the Federal Communications Commission.

If you have any questions please feel free to contact me.

Sincerely,

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Greg Follensbee Executive Director, AT&T Florida

cc: Ms. Catherine Beard w/o attachments Mr. Bob Casey w/o attachments

Enclosure

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<sup>&</sup>lt;sup>1</sup> Id. ¶9 (imposing 30-day notice requirement).

Federal Communications Commission

### Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of ) Administration of the North American Numbering ) Plan ) CC Docket 99-200 ) ) ) ) )

ORDER

#### Adopted: January 28, 2005

Released: February 1, 2005

By the Commission: Commissioners Abernathy, Copps, and Adelstein concurring and issuing separate statements.

## I. INTRODUCTION

1. In this order, we grant SBC Internet Services, Inc. (SBCIS)<sup>1</sup> a waiver of section 52.15(g)(2)(i) of the Commission's rules.<sup>2</sup> Specifically, subject to the conditions set forth in this order, we grant SBCIS permission to obtain numbering resources directly from the North American Numbering Plan Administrator (NANPA) and/or the Pooling Administrator (PA) for use in deploying IP-enabled services, including Voice over Internet Protocol (VoIP) services, on a commercial basis to residential and business customers. We also request the North American Numbering Council (NANC) to review whether and how our numbering rules should be modified to allow IP-enabled service providers access to numbering resources in a manner consistent with our numbering optimization policies. The waiver will be in effect until the Commission adopts final numbering rules for IP-enabled services.

### II. BACKGROUND

2. On May 28, 2004, SBCIS requested Special Temporary Authority (STA) to obtain numbering resources directly from the NANPA and/or the PA for a non-commercial trial of VoIP

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<sup>&</sup>lt;sup>1</sup> SBC IP Communications, Inc. (SBCIP) filed the petition in which it stated that it is an information service provider affiliate of SBC Communications, Inc. On January 27, 2005, SBC sent a letter to the Commission stating that SBCIP has been consolidated into another SBC affiliate, known as SBC Internet Services, Inc. (SBCIS), effective December 31, 2004. See Letter to Marlene H. Dortch, Secretary, Federal Communications Commission, from Jack Zinman, General Attorney. SBC Telecommunications, Inc. (January 25, 2005). Accordingly, in this Order we refer to SBCIS instead of SBCIP.

 $<sup>^2</sup>$  47 C.F.R. § 52.15(g)(2)(i). Section 52.15(g)(2)(i) requires each applicant for North American Numbering Plan (NANP) resources to submit evidence that it is authorized to provide service in the area for which the numbering resources are being requested.

services.<sup>3</sup> On June 16, 2004, the Commission granted a STA to SBCIS to obtain up to ten 1,000 blocks directly from the PA for use in a limited, non-commercial trial of VoIP services.<sup>4</sup> On July 7, 2004, SBCIS requested a limited waiver of section 52.15(g)(2)(i) of our rules, which requires applicants for numbering resources to provide evidence that they are authorized to provide service in the area in which they are requesting numbering resources.<sup>5</sup> SBCIS's petition asserts that it intends to use the numbering resources to deploy IP-enabled services, including VoIP services, on a commercial basis to residential and pasiness customers.<sup>6</sup> In addition, SBCIS limits its waiver request in duration until we adopt final numbering rules in the *IP-Enabled Services* proceeding.<sup>7</sup> SBCIS asserts that this limited waiver of our trade sting rules will allow it to deploy innovative new services using a more efficient means of Labor protection between IP networks and the Public Switched Telephone Network (PSTN).<sup>8</sup> Finally, SBCIS argues that granting the waiver will not prejudge the Commission's ability to craft rules in that proceeding.<sup>9</sup> The Commission released a Public Notice on July 16, 2004, seeking comment on this petition.<sup>44</sup> Several parties filed comments.<sup>11</sup>

3. The standard of review for waiver of the Commission's rules is well settled. The Commission may waive its rules when good cause is demonstrated.<sup>12</sup> The Commission may exercise its Control of the waive a rule where the particular facts make strict compliance inconsistent with the public structs<sup>13</sup> In doing so, the Commission may take into account considerations of hardship, equity, or more

<sup>5</sup> Sev SBC IP Communications, Inc. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Satisf Regarding Access to Numbering Resources, filed July 7, 2004 (SBCIS Petition).

<sup>6</sup> See SBCIS Petition at 1.

<sup>7</sup> IP-Enabled Services, WC Docket No. 04-36, Notice of Proposed Rulemaking. 19 FCC Rcd 4863 (2004) (IP-<sup>7</sup> thied Services NPRM). In the IP-Enabled Services NPRM, the Commission sought comment on whether any <sup>8</sup> thied services NPRM). In the IP-Enabled Services NPRM, the Commission sought comment on whether any <sup>8</sup> thied services, while at the same time continuing to maximize the use and life of numbering resources in the North American Numbering Plan. IP-Enabled Services NPRM, 19 FCC Rcd at 4914.

. Id.

\* See SBCIS Petition at 2.

<sup>14</sup> Comment Sought on SBC IP Communications, Inc. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources, Public Notice, CC Docket No. 99-200, 19 FCC Red 13158 (2004).

<sup>11</sup> See Appendix.

<sup>12</sup> 47 C.F.R. § 1.3; see also WAIT Radio v. FCC, 418 F.2d 1153, 1159 (D.C. Cir. 1969), cert denied, 409 U.S. 527 (1972) (WAIT Radio).

13 Northeast Cellular Telephone Co. v. FCC, 897 F.2d 1164, 1166 (Northeast Cellular).

See Letter to William F. Maher, Jr., Chief, Wireline Competition Bureau, Federal Communications Commission, from Gary Phillips, General Attorney & Assistant General Counsel, SBC Telecommunications, Inc. (May 28, 2004) (Phillips Letter).

<sup>&</sup>lt;sup>4</sup> in the Matter of Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, 19 FCC Rod 10708 (2004)(SBCIS STA Order).

Federal Communications Commission

effective implementation of overall policy on an individual basis.<sup>14</sup> Commission rules are presumed valid, however, and an applicant for waiver bears a heavy burden.<sup>15</sup> Waiver of the Commission's rules is therefore appropriate only if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.<sup>16</sup>

## III. DISCUSSION

4. We find that special circumstances exist such that granting SBCIS's petition for waiver is in the public interest. Thus, we find that good cause exists to grant SBCIS a waiver of section 22 (2)(i) of the Commission's rules until the Commission adopts numbering rules regarding IPenabled services.<sup>17</sup> Absent this waiver, SBCIS would have to partner with a local exchange carrier (LEC) to obtain North American Numbering Plan (NANP) telephone numbers.<sup>18</sup> Allowing SBCIS to directly south numbers from the NANPA and the PA, subject to the conditions imposed in this order, will help repedite the implementation of IP-enabled services that interconnect to the PSTN; and enable SBCIS to deploy innovative new services and encourage the rapid deployment of new technologies and advanced services that benefit American consumers. Both of these results are in the public interest.<sup>19</sup> To further what the public interest is protected, the waiver is limited by certain conditions. Specifically, we which SBCIS to comply with the Commission's other numbering utilization and optimization requirements, numbering authority delegated to the states, and industry guidelines and practices,<sup>20</sup> including filing the Numbering Resource Utilization and Forecast Report (NRUF).<sup>21</sup> We further require CBCIS to file any requests for numbers with the Commission and the relevant state commission at least days prior to requesting numbers from the NANPA or the PA. To the extent other entities seek similar relief we would grant such relief to an extent comparable to what we set forth in this Order.

5. Currently, in order to obtain NANP telephone numbers for assignment to its customers, SBCIS would have to purchase a retail product (such as a Primary Rate Interface Integrated Services Digital Network (PRI ISDN) line) from a LEC, and then use this product to interconnect with the PSTN in order to send and receive certain types of traffic between its network and the carrier networks.<sup>22</sup> SBCIS seeks to davelop a means to interconnect with the PSTN in a manner similar to a carrier, but without being possiblered a carrier.<sup>23</sup> Specifically, SBCIS states that rather than purchasing retail service it would prefer

WAIT Radio, 418 F.2d at 1159; Northeast Cellular, 897 F.2d at 1166.

WAIT Radio, 418 F.2d at 1157.

15 Id. at 1159.

<sup>17</sup> The Commission emphasizes that it is not deciding in this Order whether VoIP is an information service or a talevormmunications service.

\* See SBCIS Petition at 3-5.

<sup>14</sup> See *iP*-Enabled Services NPRM, 19 FCC Rcd at 4865 (recognizing the paramount importance of encouraging deployment of broadband infrastructure to the American people).

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<sup>29</sup> See 47 C.F.R. Part 52.

<sup>21</sup> See 47 C.F.R. § 52.15(f)(6)(requiring carriers to file NRUF reports).

<sup>22</sup> See SBCIS Petition at 2-3, PointOne Comments at 2-3.

<sup>23</sup> See SBCIS Petition at 3-5.

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to interconnect with the PSTN on a trunk-side basis at a centralized switching location, such as an incumbent LEC tandem switch. SBCIS believes this type of interconnection arrangement will allow it to use its softswitch and gateways more efficiently to develop services that overcome the availability and scalability limitations inherent in retail interconnections with the PSTN.<sup>24</sup> SBCIS states that the requested waiver is necessary for it to be able to obtain its preferred form of interconnection.

6. Granting SBCIS direct access to telephone numbers is in the public interest because it will facilitate SBCIS' ability to efficiently interconnect to the PSTN, and thereby help to achieve the Commission's goals of fostering innovation and speeding the delivery of advanced services to consumers.<sup>25</sup> As SBCIS notes in its petition, if it were to pursue this method of interconnection to the PSTN, it would be in a similar situation as commercial wireless carriers were when they sought to interconnect to the PSTN.<sup>26</sup> Many of these wireless carriers did not own their own switches, and they had to rely on incumbent LECs (ILECs) to perform switching functions.<sup>27</sup> Wireless carriers, therefore, had to interconnect with ILEC end offices to route traffic, in what is known as "Type I" interconnection.<sup>28</sup> Many wireless carriers subsequently sought a more efficient means of interconnection with the PSTN by purchasing their own switches, in what is known as "Type 2" interconnection.<sup>29</sup> In reviewing the question of whether ILECs had to provide Type 2 interconnection.<sup>30</sup> Granting this waiver in order to facilitate new interconnection arrangements is consistent with Commission precedent.

7. Although we grant SBCIS's waiver request, we are mindful that concerns have been raised with respect to whether enabling SBCIS to connect to its affiliate, SBC, in the manner described above, will disadvantage unaffiliated providers of IP-enabled voice services. Specifically, SBC recently filed an interstate access tariff with the Commission that would make available precisely the type of interconnection that SBCIS is seeking.<sup>31</sup> WilTel Communications submitted an informal complaint to the Enforcement Bureau alleging that the tariff imposes rates that are unjust, unreasonable, and unreasonably discriminatory in violation of sections 201, 202, 251 and 252 of the Communications Act of 1934 and the corresponding Commission rules.<sup>32</sup> In addition, ALTS submitted a request to the Wireline Competition Bureau that the Commission initiate an investigation of the tariff under section 205 of the Act because ALTS contends that the tariff is part of a strategy by SBC to impose access charges unlawfully on

<sup>26</sup> See SBCIS Petition at 3-4.

<sup>27</sup> In the Matter of The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Declaratory Ruling, Report No. CL-379, 2 FCC Rcd 2910, 2913-2914 (1987).

28 Id.

29 Id.

<sup>30</sup> Id.

<sup>31</sup> We note that the tariff was filed on one days' notice, and therefore it is not "deemed lawful" under section 204(a)(3), nor has the Commission found it to be lawful.

<sup>32</sup> See Letter from Adam Kupetsky, Director of Regulatory and Regulatory Counsel, WilTel Communications, to Radhika Karmarkar, Markets Disputes Resolution Division, Enforcement Bureau (Dec. 6, 2004).

<sup>&</sup>lt;sup>24</sup> See SBCIS Petition at 5. See also PointOne Comments at 3.

<sup>25</sup> See SBCIS STA Order, 19 FCC Rcd at 10709.

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unaffiliated providers of IP-enabled voice services.<sup>33</sup> Although the concerns raised about the lawfulness of SBC's tariff are serious, they do not provide a reason to delay action on a waiver that we otherwise find to be in the public interest. Rather, the appropriate forum for addressing such concerns is in the context of a section 205 investigation or a section 208 complaint.

8. Additional public interest concerns are also served by granting this waiver. The Commission has recognized the importance of encouraging deployment of broadband infrastructure to the American people.<sup>34</sup> The Commission has stated that the changes wrought by the rise of IP-enabled communications promise to be revolutionary.<sup>35</sup> The Commission has further stated that IP-enabled approaces have increased economic productivity and growth, and it has recognized that VoIP, in particular, will encourage consumers to demand more broadband connections, which will foster the development of more IP-enabled services.<sup>36</sup> Granting this waiver will spur the implementation of IP-enabled services and facilitate increased choices of services for American consumers.

9. Various commenters assert that SBCIS's waiver should be denied unless SBCIS meets a malety of Commission and state rules (e.g., facilities readiness requirements,<sup>37</sup> ten digit dialing rules,<sup>38</sup> contributing to the Universal Service Fund,<sup>39</sup> contributing applicable interstate access charges,<sup>40</sup> nondiscrimination requirements,<sup>41</sup> and state numbering requirements).<sup>42</sup> We agree that it is in the public's interest to impose certain conditions. Accordingly, we impose the following conditions to meet the concern of commenters: SBCIS must comply with the Commission's numbering utilization and optimization requirements and industry guidelines and practices, including numbering authority delegated to mate commissions; and SBCIS must submit any requests for numbering resources to the Commission and the relevant state commission at least 30 days prior to requesting resources from the NANPA or the PA.<sup>43</sup> These requirements are in the public interest, because they will help further the Commission's goal of ensuring that the limited numbering resources of the NANP are used efficiently.<sup>44</sup> We do not find it necessary, however,

<sup>24</sup> See IP-Enabled Services NPRM, 19 FCC Rcd at 4365.

<sup>17</sup> Id. at 4867.

<sup>14</sup> Id.

<sup>37</sup> See AT&T Comments in Opposition at 5-6.

<sup>38</sup> See Ohio PUC Comments at 4-5, Michigan PUC Reply Comments at 6-7.

See BellSouth Comments at 8.

<sup>41</sup> See Ohio PUC Comments at 8; Vonage Comments at 9.

<sup>42</sup> See California PUC Reply Comments at 5-6; Missouri PSC Reply Comments at 2.

<sup>43</sup> See supro at para. 4. In its pleadings, SBCIS noted its willingness to comply with all federal and state numbering requirements. See SBCIS Reply Comments at 8-10; see also SBCIS Comments at 9-10.

<sup>44</sup> Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, CC Docket 99-200, 15 FCC Red 7574, 7577 (2000).

<sup>&</sup>lt;sup>33</sup> See Letter from Jason D. Oxman, General Counsel, ALTS, to Jeffrey Carlisle, Chief, Wireline Competition Eureau (Nov. 19, 2004).

<sup>&</sup>lt;sup>40</sup> *Id.* at 8-9.

to condition SBCIS' waiver on compliance with requirements other than numbering requirements.<sup>45</sup> Requiring SBCIS to comply with numbering requirements will help alleviate concerns with numbering tibaact. For example, the NRUF reporting requirement will allow the Commission to better monitor SBCIS' number utilization. Most VoIP providers' utilization information is embedded in the NRUF data of the LEC from whom it purchases a Primary Rate Interface (PRI) line. Also, SBCIS will be able to obtain blocks of 1,000 numbers in areas where there is pooling, as opposed to obtaining a block of 10,000 numbers as a LEC customer. Moreover, SBCIS will be responsible for processing port requests directly rather than going through a LEC. SBCIS' other obligations are not relevant to this waiver and will be addressed in LDM: proceedings, including the *IP-Enabled Services* proceeding.

10. Among the numbering requirements that we impose on SBCIS is the "facilities readiness" requirement set forth in section 52.15(g)(2)(ii). A number of parties have raised concerns about how 38CiS will demonstrate that it complies with this requirement.<sup>46</sup> In general, SBCIS should be able to satisfy this requirement using the same type of information submitted by other carriers. As noted by SPCIS, however, one piece of evidence typically provided by carriers is an interconnection agreement with the facumbent LEC that serves the geographic area in which the carrier proposes to operate.47 For manual of demonstrating compliance with section 52.15(g)(2)(ii), if SBCIS is unable to provide a copy . In interconnection agreement approved by a state commission, we require that it submit evidence that it has ordered an interconnection service pursuant to a tariff that is generally available to other providers of IP-enabled voice services. The tariff must be in effect, and the service ordered, before SBCIS submits an upplication for numbering resources. SBCIS, however, may not rely on the tariff to meet the facilities readiness requirement if the Commission initiates a section 205 investigation of the tariff. These requirements represent a reasonable mechanism by which SBCIS can demonstrate how it will connect its facilities to, and exchange traffic with, the public switched telephone network. This requirement also nelps to address the concerns raised by Vonage regarding the potential for SBCIS to obtain discriminatory access to the network of its incumbent LEC affiliate.48

11. Finally, a few commenters urge the Commission to address SBCIS's petition in the current *PEnabled Services* proceeding.<sup>49</sup> We decline to defer consideration of SBCIS's waiver until final numbering rules are adopted in the *IP-Enabled Services* proceeding. The Commission has previously

🐔 See 47 C.F.R. Part 52.

46 See AT&T Comments at 5-6; Vonage Comments at 6-7.

" See SBCIS Reply Comments at 11.

<sup>48</sup> See Vonage Comments at 4. SBC recently filed a new interstate access tariff offering the form of tandem lattracturation described by SBCIS in its waiver petition. WilTel Communications has filed an informal complaint against the tariff and ALTS has requested that the Commission initiate an investigation of that tariff pursuant to section 205. See supra para. 7. As noted above, either a section 205 investigation or a section 208 complaint is a better mechanism than this waiver proceeding for addressing discrimination concerns raised by the tariff. *Id.* We note that interested parties also have the option to oppose tariff filings at the time they are made or to file complaints after a tariff takes effect.

<sup>49</sup> See AT&T Comments in Opposition at 4-5, Verizon Reply Comments at 1-2, California PUC Reply Comments at 7-9.

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granted waivers of Commission rules pending the outcome of rulemaking proceedings,<sup>50</sup> and for the reasons articulated above, it is in the public interest to do so here. We also request the NANC to review whether and how our numbering rules should be modified to allow IP-enabled service providers access to numbering resources in a manner consistent with our numbering optimization policies. We grant this waiver until the Commission adopts final numbering rules regarding IP-enabled services. To the extent other entities seek similar relief we would grant such relief to an extent comparable to what we set forth in this Order.

## . IV. ORDERING CLAUSE

12. IT IS ORDERED that, pursuant to sections 1, 3, 4, 201-205, 251, 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 153, 154, 201-205, 251, and 303(r), the Faderal Communications Commission GRANTS a waiver to SBCIS to the extent set forth herein, of socian 52.15(g)(2)(i) of the Commission's rules, until the Commission adopts final numbering rules regarding IP-enabled services.

### FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch Secretary

<sup>50</sup> See e.g., Pacific Telesis Petition for Exemption from Customer Proprietary Network Information Notification Requirements, Order, DA 96-1878 (rel. Nov. 13, 1996)(waiving annual Customer Proprietary Network Information (CPNI) notification requirements, pending Commission action on a CPNI rulemaking). **Federal Communications Commission** 

# APPENDIX

# .....menters

A TatT Corporation BellSouth Corporation Luwa Utilities Board Merry Work State Department of Public Service Entropy Vania Public Utility Commission 2014-100 Public Utilities Commission of Ohio Entropy Corporation Units Warner Telecom, Inc. Vonage Holdings Corporation

### Restly Commenters

AT&T Corporation California Public Utilities Commission Indiana Utility Regulatory Commission John Staurulakis, Inc. Maine Public Utilities Commission Michigan Public Service Commission Mational Association of Regulatory Utility Commissions fublic Service Commission of the State of Missouri SBC IP Communications, Inc. Serint Corporation

mage Holdings, Corporation

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### CONCURRING STATEMENT OF COMMISSIONER KATHLEEN Q. ABERNATHY

## Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

I support the Commission's decision to grant SBC IP Communications direct access to numbering resources, subject to the conditions set forth in this Order. I would have preferred, however, to grant such access by adopting a rule of general applicability, rather than by waiver. All of the arguments that justify allowing SBCIP to obtain numbers directly appear to apply with equal force to many other IP providers, suggesting that this decision will trigger a series of "me too" waiver petitions. Moreover, proceeding by rulemaking would have better enabled the Commission to address potential concerns associated with the direct allocation of numbers to IP providers. Particularly where, as here, the Commission already has sought public comment in a Notice of Proposed Rulemaking, I support adhering to the notice-and-comment rulemaking process established by the APA, rather than developing important policies through an ad hoc waiver process.

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## CONCURRING STATEMENT OF COMMISSIONER MICHAEL J. COPPS

#### Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

Congress charged the Commission with the responsibility to make numbering resources available "on an equitable basis." Because numbers are a scarce public good, it is imperative that the Commission develop policies that ensure their efficient and fair distribution. I support today's decision because it is conditioned on SBC Internet Services complying with the Commission's numbering utilization and optimization requirements, numbering authority delegated to the states and industry guidelines and practices, including filing the Numbering Resource and Utilization Forecast Report. In addition, SBC Internet Services is required to file any requests for numbers with the Commission and relevant state commission in advance of requesting them from the North American Numbering Plan Administrator and/or Pooling Administrator.

I limit my support to concurring, however, because I think the approach the Commission takes here is less than optimal. Undoubtedly, SBC Internet Services is not the only provider of IP services interested in direct access to numbering resources. But our approach today neglects the need for broader reform that could accommodate other IP service providers. It puts this off for another day, preferring instead to address what may soon be a stream of wavier petitions on this subject.

While I am encouraged that the offices have agreed to refer these broader issues to the experts on the North American Numbering Council, I am disappointed that this did not occur well before today's item. Like so many other areas involving IP technology, this Commission is moving bit by bit through petitions without a comprehensive focus that will offer clarity for consumers, carriers and investors alike.

Finally, I think it is important to acknowledge that numbering conservation is not an issue that the federal government can undertake by itself. States have an integral role to play. This is why Congress specifically provided the Commission with authority to delegate jurisdiction over numbering administration to our state counterparts. Consumers everywhere are growing frustrated with the proliferation of new numbers and area codes. As IP services grow and multiply, state and federal authorities will have to redouble our efforts to work together. After all, we share the same goals—ensuring that consumers get the new services they desire and ensuring that numbering resources are distributed in the most efficient and equitable manner possible.

### CONCURRING STATEMENT OF COMMISSIONER JONATHAN S. ADELSTEIN

### Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

I support this decision to permit SBC to pursue innovative network interconnection arrangements through a limited and conditional waiver that grants SBC access to numbering resources for their IPenabled services. In granting this relief, I note SBC's commitment to comply with Federal and State numbering utilization and optimization requirements. I am also pleased that this Order includes a referral to the North American Numbering Council for recommendations on whether and how the Commission should revise its rules more comprehensively in this area. While I support this conditional waiver, these issues would be more appropriately addressed in the context of the Commission's IP-Enabled Services rulemaking. Addressing this petition through the IP-Enabled Services rulemaking would allow the Commission to consider more comprehensively the number conservation, intercarrier compensation, universal service, and other issues raised by commenters in this waiver proceeding. It would also help address commenters' concerns that we are setting IP policy on a business plan-by-business plan basis rather than in a more holistic fashion.

	C		ral Office Code Assign Code (NXX) Assignment July 19,	Request – Part 1 (A	
Track	king Number:				
Туре	of Application:	New	Change <sup>1</sup>	Delete	
	ENERAL INFORM ontact Information:	ATION			
Code	Applicant:				
Comp	pany/Entity Name:	SBC INTERN	ET SERVICES, INC. d/b	a AT&T INTERNET	SERVICES
	quarters Address:	202 S. AKAR	D STREET		
City, S	State, Zip:	DALLAS, TE	KAS 75202		
Conta	act Name:	PATTY BERR	us		
Conta	act Address;	2600 CAMINO	RAMON, ROOM 2875	MM	
City, S	State, Zip:	SAN RAMON	, CA 94583		
Phone	e:	925-901-1934	Fax: 925-355-926	8 E-Mail: pb1	986@att.com
Code	Administrator <sup>2</sup> :				
Name	<b>)</b> :				
Addre	ISS:				
City, S	State, Zip:				
Phone	e:		Fax:		
1.2	NPA: <u>321</u> Switching Identific Locality/City/Wire Homing Tandem	Center:	g Entity/POI) <sup>5</sup> : ORLDI	LMA78Z	rent Company's OCN(s): 0555 0RLANDO CLLI <sup>TM 8</sup> : ORLDFLMA04T
1.3	Dates: Date of A	Application:		Requested Effection	ve Date <sup>9 10</sup> :
	can grant. Pl	ease note that t			t possible effective date the Administrator ator's processing time, however the
	Request Expedit Request Exp	ed Treatment pedite" = Yes	🗌 Yes 🗍 No Ei	pedite Documentatio	n must be provided if
	Expedite Explana	ation			
<b>1.4</b>	<ul> <li>a). Type of comparison</li> <li>b). Type of Servit</li> <li>c). Code Assignment</li> <li>d). Codes that an other of the service of t</li></ul>	ce VOIP nent Preference e undesirable, i	e (Optional) f any	<b>.</b> (e.g., Cellular – Ty	(LEC, IC, CMRS, Other) ype 2)
	e). Type of Chan	I-company <sup>11</sup>	it apply):	Rate Center	Tandem Homing CLLI Extend Reservation Page 1 of 27

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	Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010
1.5	Type of Request (Initial, Growth, etc.) INITIAL
	If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.
	Pool Indicator <sup>13</sup> : X Yes No
1.6	NPA Jeopardy Criteria Apply: 🗍 Yes 🛛 No
1.7	Code request for new service (Explain): INITIAL LRN
1.8	L It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.
Comm	ents: Retain the "7" block out of the code and donate remaining "9" blocks to the NeuStar Number Pool.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<u>http://www.atis.org/inc/docs.asp</u>) as of the date of this application.<sup>14</sup>

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Code Applicant	Title	Date

Page 2 of 27

#### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

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<sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia<sup>TM</sup> COMMON LANGUAGE CLLI<sup>TM</sup> Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

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<sup>9</sup> Code applicants should request an effective date that is at least 66 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 code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are <u>not</u> the current Code Holder

<sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> An incomplete form may result in delays in processing this request.

Page 3 of 27

<sup>&</sup>lt;sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>&</sup>lt;sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>&</sup>lt;sup>TM</sup> Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

# Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

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Tracking Number:				
Type of Application:	New	Change <sup>1</sup>	Delete	
1.0 GENERAL INFORM 1.1 Contact Information:				
Code Applicant: Company/Entity Name:	SBC INTERN	ET SERVICES, INC.	d/b/a AT&T INTERNE	T SERVICES
Headquarters Address:	202 S. AKAR	D STREET		
City, State, Zip:	DALLAS, TE	XAS 75202		
Contact Name:	PATTY BER	RIS		
Contact Address:	2600 CAMIN	O RAMON, ROOM 25	750MM	
City, State, Zip:	SAN RAMON	I, CA 94583		
Phone:	925-901-193	Fax: 925-355-9	268 E-Mail: pl	b1986@att.com
Code Administrator <sup>2</sup> :				
Name:				
Address:				
City, State, Zip:				
Phone:		Fax:		
1.2 NPA: 386	NXX <sup>3</sup> :	LATA: 456	OCN4: 516C F	Parent Company's OCN(s): 0555
Switching Identific	cation(Switching	g Entily/POI) <sup>5</sup> : DYE	BHFLMAXHZ	
Locality/City/Wire	Center:		Rate Center <sup>6</sup> :	PIERSON
Homing Tandem	Operating Co.7	AT&T	Tandem Homing	CLLI <sup>TM 8</sup> : DYBHFLPO01T
-				<u></u>
1.3 Dates: Date of /	Application:		Requested Effect	ctive Date <sup>9 10</sup> :
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cari grant. Pl	lease note that		eduction in the Adminis	est possible effective date the Administrator strator's processing time, however the
Request Expedit "Request Ex	ed Treatment pedite" = Yes	🗌 Yes 🚺 No	Expedite Documentati	ion must be provided if
Expedite Explana	ation			
1.4 a). Type of compa	any/entity reque	sting the code: V	OIP	(LEC, IC, CMRS, Other)
b). Type of Servi	· · ·	-	(e.g., Cellular -	Type 2)
c). Code Assignn	nent Preference	e (Optional)		
d). Codes that an				
e). Type of Chan		•	······	
		Switching Id	Rate Center	Tandem Homing CLLI
		Effective Date		Extend Reservation
	Company			
				Page 4 of 27
				DOCUMENT NUMBER-DATE
				02655 APR 19 =
				FPSC-COMMISSION CLERK

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
July 19, 2010

1.5 Type of Request (Initial, Growth, etc.) INITIAL

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pool Indicator<sup>13</sup>: X Yes 🔲 No

1.6	NPA Jeopardy	Criteria	Apply:	Yes	🛛 No	
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1.7 Code request for new service (Explain): INITIAL LRN

1.8

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

### Comments: Retain the "7" block out of the code and donate remaining "9" blocks to the NeuStar Number Pool.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<u>http://www.atis.org/inc/docs.asp</u>) as of the date of this application.<sup>14</sup>

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Code Applicant	Title	Date

Page 5 of 27

#### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request -- Part 1 (ATIS-0300050.p1) July 19, 2010

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<sup>10</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

11 Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> An incomplete form may result in delays in processing this request.

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<sup>&</sup>lt;sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

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# Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

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Traci	king Number:						
Туре	of Application:	New	Change <sup>1</sup>	Delete			
	ENERAL INFORM	ATION					
	Applicant: pany/Entity Name:	SBC INTERNE	T SERVICES, INC. d/b	/a AT&T INTER		1	
	quarters Address:	202 S. AKARD					
	State, Zip:	DALLAS, TEX					
• •	ict Name:	PATTY BERRIS			-		· · · ·
Conta	ct Address:	2600 CAMINO	RAMON, ROOM 2875	DMM			
City.	State, Zip:	SAN RAMON,					
Phone	•	925-901-1934	Fax: 925-355-926	8 E-Mail:	pb1986@att.c	om	
Code	Administrator <sup>2</sup> :						
Name							
Addre	SS:						
City, S	State, Zip:					- ···	
Phone	9:		Fax:				
1.2		NXX <sup>3</sup> :		CN⁴: <u>516C</u>	Parent Comp	any's OCN(s):	0555
	Switching Identific		Entity/POI) <sup>®</sup> : MIAME	LACQMD			
	Locality/City/Wire			Rate Center			
	Homing Tandem	Operating Co.':	<u>AT&amp;T</u>	Tandem Hom	ning CLLI'" ":	NDADFLGG	HT
1.3	Dates: Date of A	Application:		Requested E	ffective Date <sup>9 10</sup>	:	
	can grant. Pl	ease note that thi	icknowledge that I am is s only applies to a redu in the order received.				
	Request Expedite "Request Exp Expedite Explana	pedite" = Yes	☐ Yes ☐ No E	pedite Documen	itation must be p	provided if	
1.4	a). Type of compa	anv/entity request	ing the code: VOI		(LEC	IC, CMRS, Oth	er)
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	c). Code Assignm		Ontional)	_ (0.9., 00.000	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
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		-company <sup>12</sup>	Effective Date			tend Reservation	
		company				ICHA I JOSOI AGUA	
						Page 7 of 27	

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#### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

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Pool Indicator<sup>13</sup>: X Yes I No

1.6	NPA	Jeopardy	Criteria	Apply:	🗌 Yes	🛛 No
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1.8

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PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Code Applicant	Title	Date

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#### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request - Part 1 (ATIS-0300050.p1) July 19, 2010

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Page 9 of 27

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# Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

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Track	ing Number:				
Туре	of Application;	New	Change <sup>1</sup>	Delete	
	ENERAL INFORM	ATION			
Code	Applicant:				
Comp	any/Entity Name:	SBC INTERNET	SERVICES, INC. d/	b/a AT&T INTERNET S	SERVICES
Head	quarters Address:	202 S. AKARD	STREET		
City, S	State, Zip:	DALLAS, TEXA	\$ 75202		
Conta	ct Name:	PATTY BERRIS			
Conta	ct Address:	2600 CAMINO	RAMON, ROOM 287	50MM	
City, S	State, Zip:	SAN RAMON, O	A 94583		
Phone	Ð:	925-901-1934	Fax: 925-355-92	58 E-Mail: pb1	986@att.com
Code	Administrator <sup>2</sup> :				
Name	):			<u> </u>	
Addre	SS:				
City, S	State, Zip:				······································
Phone	<b>e</b> :		Fax:		
1.2	NPA: 904 Switching Identifie	NXX <sup>3</sup> :		DCN <sup>4</sup> : <u>516C</u> Par <b>FLCL43Z</b>	rent Company's OCN(s): 0555
	Locality/City/Wire	Center:			IDDLEBURG
	Homing Tandem	Operating Co.7:	AT&T	Tandem Homing C	CLLITM 8: JCVLFLSM01T
1.3	Dates: Date of	Application:		Requested Effectiv	ve Date <sup>9 10</sup> :
	can grant. Pl	ease note that thi			possible effective date the Administrator ator's processing time, however the
	Request Expedit *Request Exp Expedite Explana	pedite" = Yes	Yes No E	xpedite Documentation	n must be provided if
1.4	a). Type of compa	any/entity request	ng the code: VO	P	(LEC, IC, CMRS, Other)
	b). Type of Servi	ce VOIP		(e.g., Cellular - Ty	rpe 2)
	c). Code Assignm	nent Preference (	Optional)		
	d). Codes that ar	e undesirable, if a	ny		
	e). Type of Chan	ge (Mark <u>all</u> that a	apply):		······
	OCN: Intra	a-company <sup>11</sup> [	Switching Id	Rate Center	Tandem Homing CLLI
	OCN: Inte		Effective Date	🔲 LATA	Extend Reservation
					Page 10 of 27

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PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Code Applicant	Title	Date

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#### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request - Part 1 (ATIS-0300050.p1) July 19, 2010

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<sup>\*</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLIM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of

<sup>&</sup>lt;sup>2</sup>. <sup>9</sup> Code applicants should request an effective date that is at least 66 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 code. Such arrangements are outside the scope of these guidelines.

<sup>&</sup>lt;sup>10</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

<sup>&</sup>lt;sup>11</sup> Select if you are the current Code Holder

<sup>&</sup>lt;sup>12</sup> Select if you are not the current Code Holder

<sup>&</sup>lt;sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>&</sup>lt;sup>14</sup> An incomplete form may result in delays in processing this request.

Tracking Number:				
TBPAG Attachment 1 ATIS-0300066.at1			November 17, 2008	
Thousands-Block Application Form Part 1A				
Type of Application (check one):	<u>X New</u>	Change	<u>Disconnect</u>	
GENERA	L APPLICATION I	NFORMATION		
1.1 Contact Information:				
Block Applicant: Company Name: <u>SBC INTERNET SERV</u> Headquarters Address: <u>208 S. AKARD S</u> Contact Name: <u>PATTY BERRIS</u> Contact Address <u>2600 CAMINO RAMO!</u> Phone: <u>925-901-1934</u> Fax: <u>925-355-926</u> E-Mail: <u>pb1986@att.com</u>	<u>ST. City DALLAS</u> S N City <u>SAN RAMO</u>	tate <u>TX</u> Zip <u>75202</u>		
Pooling Administrator <sup>#</sup> : Contact Name:				
Contact Address:		State	Zip	
Phone:	Fax:		mp	
E-Mail:				
1.2 General Information				
Check one: No LRN needed Li	RN needed''' <u>X</u>			
NPA: <u>321</u> LATA <u>458</u> OCN <sup>iv</sup> : <u>516C</u> Number of Thousands-Blocks Requeste		OCN <u>0555</u>		
Switch Identification (Switching Entity/PC Rate Center <sup>M</sup> : <u>ORLANDO</u> Rate Center	DI) <sup>v</sup> : <u>ORLDFLMA78</u> Sub Zone:	Z_City or Wire Cente	er Name	
1.3 Dates				
Date of Application <sup>vil</sup> : Request Expedited Treatment? (See Se	Requested Block E ction 8.6) Yes	Effective Date <sup>viii</sup> :		
By selecting this checkbox, I acknow Administrator can grant. Please note time, however the request will still be	that this only appli	es to a reduction in th		
1.4 Type of Service Provider Request	ing the Thousands	-Block:		
a) Type of Service Provider: <u>VOIP</u> b) Primary type of service Blocks to c) Thousands Block(c) (XXX) as	be used for: VOIP			

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Tracking Number: \_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

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November 17, 2008

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# Thousands-Block Application Form Part 1A

### 1.5 Type of Request

Initial block for rate center: Yes X If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes \_ If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of Change (Mark all that apply):

OCN: Intra-company <sup>ix</sup>	Switching Id	Part 1B	
OCN: Inter-company <sup>x</sup>	Effective Date		

Change block: Yes\_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

### 1.6 Block Return

- a) Is this block Contaminated: Yes or No\_
- b) If Yes how many TNs are NOT available for assignment:\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_ or No
- d) Has this block been protected from further assignment: Yes or No\_\_\_\_\_

Disconnect block: Yes\_\_\_\_, If Yes, list NPA-NXX-X

### Remarks: BLOCK for LRN.

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 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Block Appl	icant Title	Date

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Tracking Number: \_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

## Thousands-Block Application Form Part 1A

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, horning tandem and CLLI™ tandem of the facilities based provider<sup>3</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. 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

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Tracking Number: TBPAG Attachment 1 ATIS-0300066.at1			November 17, 2008
1	housands-Block Appli Part 1A		
Type of Application (check o			Disconnect
	GENERAL APPLICATION IN	FORMATION	
1.1 Contact Information:			
Block Applicant: Company Name: <u>SBC INTERN</u> Headquarters Address: <u>208 S.</u> Contact Name: <u>PATTY BERRI</u> : Contact Address <u>2600 CAMING</u> Phone: <u>925-901-1934</u> Fax: <u>925</u> E-Mail: <u>pb1986@att.com</u>	AKARD ST. City DALLAS St S D RAMON City SAN RAMO	ate <u>TX</u> Zip <u>75202</u>	· · ·
Pooling Administrator <sup>xii</sup> : Contact Name:			
Contact Address:			<b>7</b> :-
Phone:	City Fax:	State	2ip
E-Mail:			
1.2 General Information Check one: No LRN needed	LRN needed <sup>ziv</sup> X		
NPA: <u>386</u> LATA <u>456</u> OCN <sup>®</sup> Number of Thousands-Blocks F	: <u>516C</u> Parent Company's O	CN <u>0555</u>	
Switch Identification (Switching Rate Center <sup>wii</sup> : <b>PIERSON</b> Rat			
1.3 Dates			
Date of Application <sup>will</sup> : Request Expedited Treatment?	Requested Block I (See Section 8.6) Yes	Effective Date <sup>xix</sup> : No	
By selecting this checkbox, Administrator can grant. Ple time, however the request	I acknowledge that I am requesse note that this only applie will still be processed in the or	s to a reduction in th	ossible effective date the e Administrator's processing
1.4 Type of Service Provider	Requesting the Thousands	-Block:	
<ul> <li>b) Primary type of service</li> <li>c) Thousands-Block(s) (1)</li> </ul>	er: <u>VOIP</u> (LEC, IXC, CMRS, ( Blocks to be used for: <u>VOIP</u> IXX-X) assignment preference	e (optional)	anv

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Tracking Number: TBPAG Attachment 1 TIS-0300066.at1	
	Thousands-Block Application Form Part 1A
1.5 Type of Request	
Initial block for rate cent Service within 60 days	er: Yes $\underline{X}$ If Yes attach evidence of authorization and proof of capability to provide
Growth block for rate ce	enter: Yes _ If Yes, attach months to exhaust worksheet
understand that on the block off	the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC active date.
understand that on the block eff Type of Change (Mark a	the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC ective date. If that apply): any <sup>xx</sup> Switching Id Part 1B
understand that on the block eff Type of Change (Mark <u>a</u> OCN: Intra-comp OCN: Inter-comp	the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC ective date. If that apply): any <sup>xx</sup> Switching Id Part 1B
understand that on the block eff Type of Change (Mark <u>a</u> OCN: Intra-comp OCN: Inter-comp Change block: Yes <b>1.6 Block Return</b> a) Is this block Co	the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC ective date. any <sup>st</sup> Switching Id Part 1B any <sup>sd</sup> Effective Date 
understand that on the block eff Type of Change (Mark a OCN: Intra-comp OCN: Inter-comp Change block: Yes 1.6 Block Return a) Is this block Co b) If Yes how man	the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC ective date. any <sup>xx</sup> Switching Id Part 1B any <sup>xd</sup> Effective Date 

## Remarks: BLOCK for LRN.

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 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Block Appl	icant Title	Date

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Tracking Number: \_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

# Thousands-Block Application Form Part 1A

#### 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<sup>w</sup> LERG<sup>w</sup> 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<sup>w</sup> 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<sup>™</sup> tandem of the facilities based provider<sup>cotl</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. 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

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November 17, 2008

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#### **Thousands-Block Application Form** Part 1A

Footnotes:

'Identify the type of change(s) in Section 1.5.

" 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).

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'M code of the switch /POI.

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 PSTN prior to the effective date of the block(s).

\* Select if you are not the current Block Holder

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

xii Identify the type of change(s) in Section 1.5.

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

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

xv 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>xvi</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™ code of the switch /POI.

xvii Rate Center name must be a tariffed Rate Center.

wi 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.

xix Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

\*\* Select if you are the current Block Holder

xxi Select if you are not the current Block Holder

xxii Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Tracking Number: TBPAG Attachment 1 ATIS-0300066.at1			November 17, 2008	
Inousa	nds-Block Appli Part 1A	cation Form		
Type of Application (check one):		Change	Disconnect	
GENERA	AL APPLICATION IN	FORMATION		
1.1 Contact Information:				
Biock Applicant: Company Name: <u>SBC INTERNET SER</u> Headquarters Address: <u>208 S. AKARD</u> Contact Name: <u>PATTY BERRIS</u> Contact Address <u>2600 CAMINO RAMO</u> Phone: <u>925-901-1934</u> Fax: <u>925-355-926</u> E-Mail: <u>pb1986@att.com</u>	<u>\$T. City DALLAS St</u> N. City <u>SAN RAMO</u>	ate <u>TX</u> Zip <u>75202</u>		
Pooling Administrator":				
Contact Name: Contact Address:				
Phone:	_Fax:	State	2ip	
E-Mail:				
1.2 General Information Check one: No LRN neededL NPA: <u>754</u> LATA <u>460</u> OCN <sup>iv</sup> : <u>516C</u> Number of Thousands-Blocks Requester Switch Identification (Switching Entity/PC Rate Center <sup>vi</sup> : <u>HOLLYWOOD</u> Rate Cent	Parent Company's ( d: <u>1</u> Ol) <sup>v</sup> : <b>MIAMFLACQM</b>	D City or Wire Cente	er Name	
1.3 Dates				
Date of Application <sup>vil</sup> : Request Expedited Treatment? (See Se	Requested Block E	ffective Date <sup>viii</sup> : No		
By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.				
1.4 Type of Service Provider Request	ting the Thousands	Block:		
<ul> <li>a) Type of Service Provider: <u>VOIP</u></li> <li>b) Primary type of service Blocks t</li> <li>c) Thousands-Block(s) (NXX-X) a</li> <li>d) Thousands-Block(s) (NXX-X) th</li> <li>e) If requesting a code for LRN put blocks will be given to the pool)</li> </ul>	o be used for: <u>VOIP</u> ssignment preferenc nat are undesirable for rposes, indicate whic	e (optional) or this assignment, if		

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ATIS-0300066.at1		November 17, 2008
т	housands-Block / Part	Application Form
1.5 Type of Request		
Initial block for rate center: Yes ; Service within 60 days	X If Yes attach evider	ence of authorization and proof of capability to provide
Growth block for rate center: Ye	s_ If Yes, attach mont	ths to exhaust worksheet
By selecting this checkbunderstand that the und on the block effective da	lerlying CO code may r ate.	at I am willing to accept a block in red and explicitly not yet be activated in the PSTN and loaded in the NPAC
OCN: Intra-company <sup>ix</sup>	Switching Id	Part 1B
OCN: Inter-company <sup>x</sup>	Effective Date	
	s, list NPA-NXX-X	
Change block: Yes, if Yes 1.6 Block Return		

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#### Remarks: BLOCK for LRN.

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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 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Block Applica	ant Title	Date

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November 17, 2008

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#### Thousands-Block Application Form Part 1A

#### 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>34</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. 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

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#### Thousands-Block Application Form Part 1A

#### Footnotes:

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

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

" 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).

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.

" 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 PSTN prior to the effective date of the block(s).

\* Select if you are not the current Block Holder

x1 Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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<sup>&</sup>lt;sup>i</sup> Identify the type of change(s) in Section 1.5.

Tracking Number: TBPAG Attachment 1 ATIS-0300066.at1			November 17, 2008
Thousa	nds-Block Applic Part 1A	ation Form	
Type of Application (check one):		Change <sup>i</sup>	Disconnect
GENER	AL APPLICATION INF	ORMATION	
1.1 Contact Information:			
Block Applicant: Company Name: <u>SBC INTERNET SER</u> Headquarters Address: <u>208 S. AKARD</u> Contact Name: <u>PATTY BERRIS</u> Contact Address <u>2600 CAMINO RAMC</u> Phone: <u>925-901-1934</u> Fax: <u>925-355-92</u> E-Mail: <u>pb1986@att.com</u>	ST. City DALLAS Sta	te <u>TX</u> Zip <u>75202</u>	
Pooling Administrator <sup>ii</sup> : Contact Name:			
Contact Address:			
Phone:	Fax:		
<b>1.2 General Information</b> Check one: No LRN needed I NPA: <u>904</u> LATA <u>45204</u> OCN <sup>M</sup> : <u>516</u> Number of Thousands-Blocks Request	C Parent Company's	OCN <u>0555</u>	
Switch Identification (Switching Entity/F Rate Center <sup>4</sup> : <u>MIDDLEBURG</u> Rate Ce	POI) <sup>v</sup> : <u>JCVLFLCL43Z (</u> onter Sub Zone:	Xity or Wire Center N	ame
1.3 Dates			
Date of Application <sup>vii</sup> : Request Expedited Treatment? (See S	Requested Block Eff ection 8.6) Yes	ective Date <sup>viii</sup> : No	
By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.			
<ul> <li>1.4 Type of Service Provider Request</li> <li>a) Type of Service Provider: <u>VOIF</u></li> <li>b) Primary type of service Blocks</li> <li>c) Thousands-Block(s) (NXX-X)</li> <li>d) Thousands-Block(s) (NXX-X)</li> <li>e) If compariso a control (NXX-X)</li> </ul>	C (LEC, IXC, CMRS, C to be used for: <u>VOIP</u> assignment preference that are undesirable for	ther) (optional) this assignment, if a	
<ul> <li>e) if requesting a code for LRN publicks will be given to the pool</li> </ul>		Diock(s) you will de	waahung (ma ramangar of me

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#### Thousands-Block Application Form Part 1A

#### 1.5 Type of Request

Initial block for rate center: Yes  $\underline{X}$  If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes \_ If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of Change (Mark all that apply):

OCN: Intra-company <sup>ix</sup>	Switching Id	Part 1B	
OCN: Inter-company <sup>x</sup>	Effective Date		

Change block: Yes\_\_\_\_, If Yes, list NPA-NXX-X \_

#### 1.6 Block Return

- a) Is this block Contaminated: Yes \_\_\_\_ or No\_
- b) If Yes how many TNs are NOT available for assignment:
- c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_ or No\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_ or No\_\_\_\_

Disconnect block: Yes\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_

#### Remarks: BLOCK for LRN.

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 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

PATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
Signature of Block Applie	cant Title	Date

Page 25 of 27

November 17, 2008

#### Thousands-Block Application Form Part 1A

#### 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, horning tandem and CLLI<sup>TM</sup> tandem of the facilities based provider. 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

Page 26 of 27

November 17, 2008

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#### Thousands-Block Application Form Part 1A

Footnotes:

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

" 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

<sup>10</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>vi</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 PSTN prior to the effective date of the block(s).

<sup>ix</sup> Select if you are the current Block Holder

\* Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

Track	ing Number:	904-MIDDLEBUR	G-FL-461795		REDACTED
Туре	of Application:	New	□Change <sup>1</sup>	Delete	
	ENERAL INFORM	ATION			
Comp Heado City, S Conta Conta City, S Phone <u>Code</u> Name Addre	Administrator <sup>2</sup> : :	SBC INTERNET	OAK PLAZA	E-Mail:	@att.com
Phone	-	925-901-1934	Fax: 925-355-92	268	
1.2		cation (Switching E Center:	LATA: <u>45204</u> Entity/POI) <sup>5</sup> : <u>JCVL</u> AT&T		Parent Company's OCN(s): 0555 MIDDLEBURG g CLLI <sup>TM 8</sup> : JCVLFLSM01T
1.3	By selecting can grant. Pl request will s Request Expedit	this checkbox, I a ease note that this still be processed i ed Treatment pedite" = Yes	s only applies to a re n the order received X Yes I No	duction in the Adminis	est possible effective date the Administ strator's processing time, however the tion must be provided if
1.4	<ul> <li>a). Type of compatible</li> <li>b). Type of Servic</li> <li>c). Code Assignation</li> <li>d). Codes that are</li> <li>e). Type of Change</li> <li>i) OCN: Intra</li> <li>ii) OCN: Inter</li> </ul>	ce Other nent Preference (( e undesirable, if a ge (Mark <u>all</u> that a l-company <sup>11</sup>	Dptional)	ice over Internet Proto	Decol       (LEC, IC, CMRS, Other)         Type 2)

6. 4

	Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010 REDACTED			
1.5	Type of Request (Initial, Growth, etc.) Growth			
	If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.			
	Pool Indicator <sup>13</sup> : X Yes I No			
1.6	NPA Jeopardy Criteria Apply: 🗍 Yes 📋 No			
1.7	Code request for new service (Explain): REQUIRE LRN TO SUPPORT NETWORK PLANS			
1.8				
	It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.			
Comm	RETAIN ONLY THE '7' BLOCK OUT OF CODE AND DONATE REMAINING BLOCKS TO THE NUMBER POOL.			
I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site ( <u>http://www.atis.org/inc/incguides.asp</u> ) as of the date of this application. <sup>14</sup>				

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		07/27/2011
Signature of Code Applicant	Title	Date

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Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010 REDACTED

<sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
 <sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned. <sup>4</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 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 Telcordia<sup>™</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia<sup>™</sup> COMMON LANGUAGE CLLI<sup>™</sup> Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2. <sup>9</sup> Code applicants should request an effective date that is at least 66 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 code. Such arrangements are outside the scope of these guidelines.

Such arrangements are outside the scope of these guidelines. <sup>10</sup> Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are <u>not</u> the current Code Holder

<sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> An incomplete form may result in delays in processing this request.

<sup>&</sup>lt;sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

Tracking Number:		TBPAG Attachr	nent 1 – March 19, 2007 ATIS-0300066.at1
Thousa	nds-Block Ap Part 1/	oplication Form	REDACTED
Type of Application (check one):	√ New	Change <sup>1</sup>	Disconnect
GENER	AL APPLICATIO	N INFORMATION	
1.1 Contact Information:			
Block Applicant: Company Name: SBCIS/ATTIS Headquarters Address: Contact Name: Contact Name: Contact Address: Phone: Contact Address: Phone: Contact Address:	City: City: Fax:		Zip94583 Zip94583
Pooling Administrator <sup>b</sup> :         Contact Name: DARA SODANO         Contact Address: 1800 SUTTER ST SUITE         Phone: 925-363-8730         E-Mail: dara.sodano@neustar.biz		<u>, CA 94520</u> 925-363-7692	
1.2 General Information			
Check one: No LRN needed	LRN needed <sup>#1</sup>	t	
NPA: <u>904</u> LATA: <u>45204</u> Number of Thousands-Blocks Requested: _	)CN <sup>iv</sup> : _ <b>516C</b>	Parent Company's O	0CN_0555
Switch Identification (Switching Entity/PO) Rate Center <sup>vi</sup> : <u>MIDDLEBURG</u> Rate Cen	() <sup>v</sup> : <u>JCVLFLCL4</u> nter Sub Zone:	3ZCity or Wire Cente	r Name
1.3 Dates			
Date of Application <sup>vii</sup> : <u>07/27/2011</u> Request Expedited Treatment? (See Section			<sup>i</sup> : <u>10/04/11</u>
1.4 Type of Service Provider Requesting	the Thousands-E	llock:	
<ul> <li>a) Type of Service Provider: _VoIP</li> <li>b) Primary type of service Blocks to be</li> <li>c) Thousands-Block(s) (NXX-X) assig</li> <li>d) Thousands-Block(s) (NXX-X) that a</li> <li>e) If requesting a code for LRN purpose be given to the pool)7</li></ul>	used for: <u>Oth</u> nment preference are undesirable for es, indicate which	(optional)	

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Tracking Number: \_\_\_\_

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TBPAG Attachment 1 - March 19, 2007 ATIS-0300066.at1

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#### Thousands-Block Application Form Part 1A

1.5 Type of Request

Initial block for rate center: No\_X\_\_, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes X\_, If Yes, attach months to exhaust worksheet

- 2 :

Change block: No\_\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect block: No\_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_

Remarks:

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.

IGNATURE ON FILE)	SR. SPECIALIST- NETWORK PLANNIN	IG ENGR07/27/2011
Signature of Block Applicant	Title	Date

Tracking Number: \_\_\_\_

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

#### Thousands-Block Application Form Part 1A

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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<sup>TM</sup> LERG<sup>TM</sup> 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<sup>TM</sup> 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<sup>TM</sup> tandem of the facilities based provider<sup>iX</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. 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.

Tracking Number:

TBPAG Attachment 1 - March 19, 2007 ATIS-0300066.at1

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#### **Thousands-Block Application Form** Part 1A

Foot Notes:

" 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

<sup>iv</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).

\* 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 CLLITM code of the switch /POI.

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 PSTN prior to the effective date of the block(s).

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

#### Appendix 3 - Modified August 6, 2001 REDACTED MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level 1 (Thousands-Block Number Pooling Growth Block Request) Date: 07/27/11 OCN: 516C Company Name: SBCIS/ATTIS Rate Center: MIDDLEBURG List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX (0), NXX-X(1) Name of Block Applicant: Signature: ON FILE Title: DATA ADMINISTRATOR Telephone No.: FAX No.: E-Mail Datt.com A. Available Numbers: B. Assigned Numbers C. Total Numbering Resources: D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation List excluded Code(s) or Block(s): Month **出1** #2 #3 #4 #5 #9 #10 #11 #12 #8 E. Growth History \_ Previous 6 8 months<sup>2</sup> F. Forecast - Next 12 months<sup>3</sup> Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6) G. 4.280 Numbers Available for Assignment to Customers (A) = H. Months to Exhaust<sup>4</sup> Average Monthly Forecast (G) 21.000 Assigned Numbers (B) - Excluded Numbers (D) \* 100 I. \_ Utilization<sup>5</sup> Total Numbering Resources (C) - Excluded Numbers (D) 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>&</sup>lt;sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Part3			RED	ACTED	Page 1 of	
From:	dara.flowers@neustar.biz					
Sent:	Wednesday, July 27, 2011 10:36 AM					
То:						
<b>C</b> -4	PA_Part3@neustar.biz					
Cc: Subject:	PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 904- MIDDLEBURG-FL-461795					
	ling Administratio July-2011	n System				
,	November 21, 2003 ATIS-0300066.at3			Attachment 3		
		Pooling Administrator's I TBPAG				
	Tracking Number :	904-MIDDLEBURG FL-461795	3-			
	Date of Application:	07/27/2011	Effective Date:			
	Date of Receipt:	07/27/2011	Date of Response:	07/27/2011	-	
			SBC INTERNET SERVICES, INC.			
	Service Provider Name: (Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN:		ERVICES, INC.		 -	
	(Telcordia TM LERG TM		ERVICES, INC		 -	
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN:	516C	ERVICES, INC.	925-363-8730	 -	
	(Telcordia <sup>™</sup> LERG <sup>™</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co	516C		925-363-8730	 -	
	(Telcordia <sup>™</sup> LERG <sup>™</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co Dara Flowers	516C Intact Information: Pistrator		<u>925-363-8730</u> 925-363-7697	 -	
·	(Telcordia <sup>™</sup> LERG <sup>™</sup> Routing Guide ) OCN: NPAC SOA SPID : <b>Pooling Administrator Co</b> Dara Flowers Signature of Pooling Admin	516C Intact Information: Pistrator	hone:		 	
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : <b>Pooling Administrator Co</b> Dara Flowers Signature of Pooling Admin Dara Flowers	516C Intact Information: P istrator F	hone:	925-363-7697	 	
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : <b>Pooling Administrator Co</b> <u>Dara Flowers</u> Signature of Pooling Admin <u>Dara Flowers</u> Name (print)	516C Intact Information: P istrator F	hone:	925-363-7697	 	
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : <b>Pooling Administrator Co</b> <u>Dara Flowers</u> Signature of Pooling Admin <u>Dara Flowers</u> Name (print)	516C Intact Information: P istrator F	hone:	925-363-7697 Z	  	
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co Dara Flowers Signature of Pooling Admin Dara Flowers Name (print) Email:	516C Intact Information: P istrator F	'hone: 'ax: <u>ara.flowers@neustar.bi</u>	925-363-7697 2		
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co Dara Flowers Signature of Pooling Admin Dara Flowers Name (print) Email:	516C Intact Information: P istrator F	hone: ax: <u>ara.flowers@neustar.bi</u> Block Assigne Block Reserve Block Reserve Block Reserve	925-363-7697		
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co Dara Flowers Signature of Pooling Admin Dara Flowers Name (print) Email:	516C Intact Information: P istrator F	hone: ax: <u>ara.flowers@neustar.bi</u> Block Assigne Block Reserve Block Reserve Block Reserve Expiration Date	925-363-7697		
	(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: NPAC SOA SPID : Pooling Administrator Co Dara Flowers Signature of Pooling Admin Dara Flowers Name (print) Email:	516C Intact Information: P istrator F	hone: ax: <u>ara.flowers@neustar.bi</u> Block Assigne Block Reserve Block Reserve Block Reserve	925-363-7697		

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Page 2 of 2

Block Contaminated(Yes or No) :

If Yes, enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): 1

Rate Center:

Part3

Rate Center Sub Zone:

X Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

\_\_\_ Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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