

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth Code Denial by Pooling Administrator for the Coral Springs Rate Center, Coral Springs )

Docket No. 110261-TX  
Filed August 26, 2011

**PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL**

Sprint Communications Company, L.P. ("Sprint"), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission Order FCC 00-104 ("FCC Order 00-104"), and Florida Public Service Commission ("Commission") Order No. PSC-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's ("Neustar's") denial of Sprint's request for additional numbering resources in the Coral Springs Rate Center. In support of this petition, Sprint states:

**PARTIES**

- 1. Sprint is a competitive local exchange company authorized to provide local exchange telecommunications in the State of Florida.
- 2. Neustar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources in pooling areas. See 47 C.F.R § 52.20(d).

**JURISDICTION**

3. This Commission has jurisdiction over this matter pursuant to the Industry Numbering Committee's (INC) Number Pooling Guidelines Sections 3.7 and 12(c). These sections provide that a carrier may challenge Neustar's decision to deny numbering resources to the appropriate regulatory authority which is, in this case, the Commission.

COM \_\_\_\_\_  
APA \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
RAD 5  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK N.G.

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## **BACKGROUND AND REQUEST FOR RELIEF**

4. On August 17, 2011, Sprint requested additional numbering resources from Neustar. *See* Attachment 1. Specifically, Sprint requested one (1) thousand-block in the 954 NPA in the rate center of Coral Springs. At the time of the code request, Sprint had a utilization threshold of 64% and Months to Exhaust (“MTE”) of 13.8 in the Coral Springs Rate Center.

5. On August 17, 2011, Neustar’s automated number request system denied Sprint’s request for additional numbering resources because Sprint had not met the utilization based criteria, notwithstanding the fact that Sprint is unable to provide the numbering resources requested by the specific customer. *See Confidential Attachment 1*. Pursuant to the requirements of Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for Sprint’s switch in the Coral Springs Rate Center. *See Confidential Attachment 2*.

6. Also provided to meet the Commission’s requirements set forth in Commission Order No. PSC-01-1973-PCO-TL, please find in Confidential Attachment 3 the written request from Sprint’s customer for these numbering resources and, therein, the customer’s contact information.

7. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review Neustar’s decision to deny a request for numbering resources. *See* INC Number Pooling Guidelines Sections 3.7 and 12(c).

8. Under existing procedures for code requests, Neustar looks only at the number of MTE and utilization for the entire rate center without exception, no other factors, which is why Sprint’s request was denied. Neustar denied Sprint’s request on the grounds that Sprint did not meet the 75% utilization threshold and the six (6) Months To Exhaust criteria.

9. Sprint requests that the Commission's reverse Neustar's decision to withhold numbering resources from Sprint because Neustar's denial of numbering resources to Sprint interferes with Sprint's ability to serve its customers within the State of Florida. Sprint's customer has made a reasonable request for additional numbers that Sprint cannot meet without additional numbering resources.

WHEREFORE, Sprint requests that the Commission:

1. Review the decision of Neustar to deny Sprint's request for additional numbering resources for the Coral Springs Rate Center; and
2. Direct Neustar to provide the requested numbering resources to Sprint for the Coral Springs Rate Center as discussed above.

Respectfully submitted this 26<sup>th</sup> day of August 2011.

SPRINT COMMUNICATIONS COMPANY, L.P.



Susan J. Berlin  
Sprint Communications Company, L.P.  
3065 Akers Mill Rd, SE, 7<sup>th</sup> Floor  
Mailstop GAATLD0704  
Atlanta, Georgia 39339  
(404) 649-8983

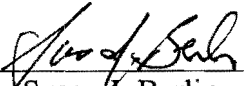
**CERTIFICATE OF SERVICE**  
**Petition for Expedited Review of Growth Code Denial by**  
**Pooling Administrator for the Coral Springs Rate Center, Coral Springs**

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

Class U.S. Mail this 26<sup>th</sup> of August 2011 to the following:

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

NANPA  
Thomas Foley  
NPA Relief Planner  
820 Riverbend Blvd.  
Longwood, Florida 32779-2327  
Telephone (407) 389-8929  
[Thomas.foley@neustar.com](mailto:Thomas.foley@neustar.com)

  
\_\_\_\_\_  
Susan J. Berlin

REDACTED

Pooling Administration System - Home

Pooling Administration System

Home | 08/27/2015 02:01:42 PM EDT

Months to Expires and Utilization for Station Worksheet - (1) (see Worksheet)

Your description identifies the [REDACTED] and FCC requires the explanation. You have requested some records that are not released per records.

Select One Option and Submit

- Return to the Station To Contact From
- Fixed to request a Show Notice
- Release a Show Notice

Submit Cancel

neustar

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**CO CODE ASSIGNMENT  
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level1**  
(Worksheet to be used for Requests for Additional Codes for Growth)

Date: 08/16/2011 Company Name: **Sprint Communications, L.P.** [REDACTED]

Switching Entity: **ATLNGAUS1GT(ATLNGAUS1GT\_N**Point of Interconnection (CLLI): **PMBHFLMA** Rate Center: CORAL

NPA(s)-NXXs included in growth calculation<sub>2</sub> :

754-484-4,754-484-7

Signature of Authorized Representative of Code Applicant:

Title: Network Analyst Telephone No.: FAX No.: (913) 762 0121

Assigned Telephone Numbers for CORAL SPG-FL : [REDACTED]

A. Telephone Numbers (TNs) Available for Assignment (See Glossary<sub>3</sub>): [REDACTED]

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
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B. Previous 6-month growth history<sub>4</sub>: [REDACTED]

C. Forecast – Next months 1-12<sub>5</sub>: [REDACTED]

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): [REDACTED]

E. Months to Exhaust<sub>6</sub> = Telephone Numbers (TNs) Available for Assignment (A) = [REDACTED]

Average Monthly Forecast (D)

F. Utilization Level<sub>7</sub> = Telephone Numbers (TNs) Assigned X 100 = [REDACTED]

Total Numbering Resources in Applicant's Inventory

1. A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.  
 2. Report on all resources served by the switching entity/POI for the requested geographic area. For example, the geographic area could be the rate area, that portion of a rate area served by the switching entity/POI, or that portion of a rate area served by a particular NPA code.  
 3. Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.  
 4. 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. "NA" means data is "Not Available" in NASTI (most probably due to PAM/BAMBI failure on process date used to generate MTE report)  
 5. Forecast of TNs needed in each following month, starting with the most recent month as Month #1. In a jeopardy situation, only 6 months growth projection is required.  
 6. To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).  
 7. Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

Explanation:

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Telephone numbers that are available for assignment are listed as 'Available' in the NMS NL-Status to NASTI NRUF Matrix document:

[http://nasti.corp.sprint.com/reports/Data/NRUF\\_Matrix/NMS\\_NL\\_Status\\_to\\_NASTI\\_NRUF\\_Matrix.xls](http://nasti.corp.sprint.com/reports/Data/NRUF_Matrix/NMS_NL_Status_to_NASTI_NRUF_Matrix.xls)

In section 'F', 'Telephone Numbers Assigned' counts how many numbers are in any of the states listed in the matrix as 'Assigned' and the 'Total Number Resources in Applicant's Inventory' is calculated by multiplying the number of codes listed at the top of the document times 10,000 plus the number of blocks listed at the top of the document times 1,000.

Old NPA's involved in a split that are past permissive dialing date are not included. New NPA's that will be created by a split are not included until the permissive dialing date.

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August 18, 2011

[REDACTED]  
Sprint Nextel

[REDACTED]  
Overland Park, KS 66215

[REDACTED]  
The following request is being submitted for consideration on behalf of [REDACTED]

[REDACTED] is currently assigned native telephone numbers in the 754 NPA for its residential and business phone service being provided in Coral Springs, Florida. The residential phone service has been offered to residents in Coral Springs since September 2008. However, we have just begun offering the business phone service in this community within the past 60 days.

In the short time that we have been offering our business phone service, we have lost the opportunity to serve two new businesses moving into our service area because they would not accept a 754 area code with the native numbers we offered them. The prevailing area code for Broward County, Florida, including Coral Springs, is 954.

These two potential new customers were concerned that a 754 area code would possibly cause a negative impact to their businesses, because callers would assume that they were not in the Broward County/Coral Springs area and that a call to them would be long distance. As a result of our not being able to provide them with a 954 area code, these businesses contracted with another phone service provider.

[REDACTED] understands that we do not currently have 954 NPA native numbers allocated for use and have yet to meet the needed 75% utilization to allow ordering through your normal process. Thus, we are requesting that a "safety valve" be submitted so that we can accommodate future requests from potential new customers who will only accept a native telephone number with the 954 area code.

[REDACTED] Coral Springs, FL 33065 [REDACTED]



We request consideration and support for assigning us a block of 1,000 954 NPA native telephone numbers within the next three months.

Please provide a response to this request at your earliest convenience, such that we at [REDACTED] will be able to meet the needs of our customers.

Sincerely,

[REDACTED]