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Susan S. Masterton
Senior Counsel

COMMISSION
CLERK

October 21, 2011

110296-TX

VIA HAND DELIVERY

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

RE: Docket No _____
Petition for Expedited Review of Growth Code Denials by the North American
Numbering Plan Administration for the Orlando Exchange of Embarq Communications,
Inc. d/b/a CenturyLink Communications

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Communications, Inc. d/b/a CenturyLink
Communications (ECI) are the original and seven copies of ECI's Petition for expedited Review
of NXX-X Code Denial, which we ask that you file in the captioned new docket. Copies are
being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at
(850) 599-1560.

Sincerely,

Susan S. Masterton

Susan S. Masterton
Enclosure

- COM _____
- APA _____
- ECR _____
- GCL _____
- RAD** 6 _____
- SRC _____
- ADM _____
- OPC _____
- CLK _____

DOCUMENT NUMBER-DATE
07727 OCT 21 =
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the North American Numbering Plan Administration for the Orlando Exchange by Embarq Communications, Inc. d/b/a CenturyLink Communications

Docket No. 110296-TX

Date Filed: October 21, 2011

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Embarq Communications, Inc. d/b/a CenturyLink Communications (ECI), pursuant to 47 C.F.R § 52.15(g)(iv), Federal Communications Commission ("FCC") Order FCC 00-104, and Florida Public Service Commission ("Commission") Order No. PSC-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's ("NeuStar") denial of ECI's request for additional numbering resources in the Orlando Exchange. In support of this petition, ECI states:

PARTIES

1. ECI is a competitive local exchange company ("CLEC") regulated by the Commission and 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. The Commission has jurisdiction of this matter pursuant to the Industry Numbering Committee's (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.

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BACKGROUND AND REQUEST FOR RELIEF

4. ECI's Orlando Exchange consists of one (1) central office and one (1) switching entity that utilizes numbering resources.

5. On October 18, 2011, ECI requested additional numbering resources from NeuStar for the Orlando exchange. (See Attachment 1 which was filed under Claim of Confidentiality with the Commission Clerk's Office.) Specifically, in order to meet the telephone number needs of one of its customers, ECI requested ten thousand (10,000) consecutive numbers (i.e., an entire NXX) in the Orlando (ORLDFLERDSO) wire center. ECI cannot currently meet this request given the inventory of numbers available at this time in this switch. This customer currently has 8,000 consecutive numbers but the remaining 2,000 numbers in that NXX are assigned to other carriers. Upon implementation of this new NXX, the customer will relinquish the existing 8,000 numbers and ECI will return them to the pool. The customer prefers numbers in the 407 NPA to best fit their dialing plan but can accept numbers in the 321 NPA if a suitable NXX is not available in the 407 NPA. In either case, the numbers must be in the format NPA-NX1-XXXX.

6. At the time of the code request, the Orlando exchange had a Months-to-Exhaust (MTE) of much longer than six (6) months and a utilization of 59%. There are no number blocks available in this exchange to meet this request.

7. On October 18, 2011, NeuStar denied ECI's request for additional numbering resources because ECI had not met the MTE and utilization criteria, notwithstanding the fact that ECI's Orlando switch does not have the available block of numbers to meet the customer's requirements. (See Attachment 1 which was filed under Claim of Confidentiality with the Commission Clerk's Office.)

8. As discussed above, both the FCC Order and INC guidelines provided that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 11.1(c).

9. Under earlier 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.

10. Under existing procedures, NeuStar and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.

11. ECI requests that the Commission use its delegated authority to reverse NeuStar's decision to withhold numbering resources from ECI and waive the Months-to-Exhaust and Utilization requirements on the following grounds:

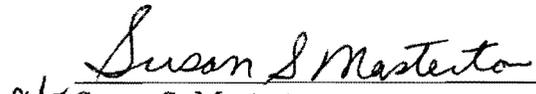
- (a.) NeuStar's denial of numbering resources to ECI interferes with ECI's ability to service its customers within the State of Florida.
- (b.) As a result of NeuStar's denial of ECI's request for additional numbering resources, ECI will be unable to provide telecommunications services to its customers.

WHEREFORE, ECI requests:

1. The Commission review the decision of NeuStar to deny ECI's request for additional numbering resources for the Orlando exchange, and

2. The Commission directs NeuStar to provide the requested numbering resources for the Orlando exchange as discussed above.

Respectfully submitted this 21st day of October, 2011.

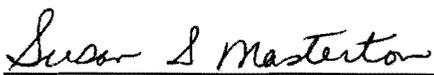

Susan S. Masterton
Attachments

DOCKET NO. _____
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
regular U.S. Mail on this 21st day of October, 2011 to the following:

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

NANPA
Tom Foley, Relief Planner Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779-2327



Susan S. Masterton

ATTACHMENT 1

**FILED UNDER CLAIM OF
CONFIDENTIALITY
PURSUANT TO SECTION
364.183(1), FLORIDA
STATUTES.**
