at&t

Tracy W. Hatch
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AT&T Florida
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REDACTED

February 5, 2013

13 FEB -5 PM 4: 32
COMMISSION
CLERK
RECEIVED-FPSC

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

> Re: Docket No.: 130043-TP
> **Petition for Expedited Review of Growth Code Denial by the**
> **Number Pooling Administrator for the Jacksonville**
> **Exchange (Southpoint)**

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, LLC d/b/a AT&T Florida's Petition for Expedited Review of Growth Code Denial, which we ask that you file in the captioned *new* docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Tracy W. Hatch

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

COM _____
AFD _____
APA _____
ECO _____
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GCL __1___
IDM _____
TEL __6___
CLK _____

DOCUMENT NUMBER-DATE

0 0 7 2 I FEB -5 ≌

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)   Docket No. _130043-TP_
Code Denials by the Number Pooling Administrator)
for the Jacksonville exchange (Southpoint))   Filed: February 5, 2013
_____)

## PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

BellSouth Telecommunications, LLC. d/b/a AT&T Florida ("AT&T Florida"),

pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission ("FCC")

Order FCC 00-104, and Florida Public Service Commission ("Commission") Order No.

PSC-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's

("NeuStar") denial of AT&T Florida's requests for additional numbering resources in the

Jacksonville exchange. In support of this petition, AT&T Florida states:

PARTIES

1.   AT&T Florida is a corporation organized and formed under the laws of the

State of Georgia and an incumbent local exchange company ("ILEC") regulated by the

Commission and authorized to provide local exchange telecommunications and

intraLATA toll telecommunications in the State of Florida.

2.   NeuStar is an independent non-governmental entity, which is responsible

for administering and managing the numbering resources in pooling areas. See 47

C.F.R. § 52.20(d).

JURISDICTION

3.   The Commission has jurisdiction of this matter pursuant to Industry

Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This

provision provides that a carrier may challenge NeuStar's decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4.   The Jacksonville exchange consists of eighteen (18) switching entities that utilize numbering resources: Arlington (JCVLFLARDS0), Atlantic (JCBHFLABRS0), Avenues (MNDRFLAVDS0), Beachwood (JCVLFLBWDS0), Clay Street (JCVLFLCLDS0), Ft. Caroline (JCVLFLFCDS0), Ft. George (FTGRFLMARS0), International Airport (JCVLFLIARS0), Lake Forest (JCVLFLLFDS0), Loretto (MNDRFLLODS0), Normandy (JCVLFLNODS0), Oceanway (JCVLFLOWDS0), Riverside (JCVLFLRV38E), San Jose (JCVLFLSJ73E), San Marco (JCVLFLSMDS0), San Pablo (JCBHFLSPRS0), Southpoint (JCVLFLJTRSA), and Wesconnett (JCVLFLWCDS0).

5.   On January 29, 2013, AT&T Florida requested additional numbering resources from NeuStar for the Southpoint (JCVLFLJTRSA) switch. See Attachment 1. Specifically, AT&T Florida requested a single number block of 1,000 numbers to meet the request of a specific customer. Due to the customer's dialing patterns, the customer needs a specific block in the format of NPA NXX-6.

6.   At the time of the code request, the Jacksonville exchange had a MTE of 216.62 and a utilization of 58.94%, while the MTE for the Southpoint (JCVLFLJTRSA) switch was 61.39 with a utilization of 85.27%.

7.   On January 29, 2013, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida is

unable to provide the numbering resources requested by the specific customer. See Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Jacksonville exchange and the customers contact information. See Attachment 2.

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

9. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar or NANPA looks at the number of MTE and utilization for the entire rate center without exception. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

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

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

(b) The MTE at the rate center level requirement is discriminatory against the incumbent LEC, since the ILEC is typically the only local service provider with multiple switches in a rate center. The ILEC deploys multiple switches in a rate center in order to

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meet customer demand for telephone service. The new FCC rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida believes that it is patently unfair to require that the ILEC only get six (6) MTE in all the switches it has deployed in a rate center, when the CLECs, which have recently entered the local service market, have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

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

WHEREFORE, AT&T Florida requests:

1.   The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the Jacksonville exchange; and

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

Respectfully submitted this 5th day of February 2013.

AT&T FLORIDA
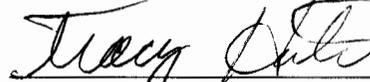
Suzanne L. Montgomery
Authorized House Counsel No. 94116
Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth
Code Denial by the Number Pooling Administrator
For the Jacksonville Exchange (Southpoint)

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

First Class U.S. Mail this 5th day of February, 2013 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
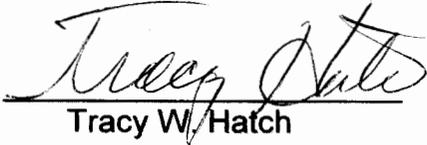
Tracy W. Hatch

Pooling Administration System

■ ████████@att.com (SP)   ● Sign Out

Time : 01/29/2013 04:37:52 PM EST

Printable Version

- Individual Block Requests
- CO/NXX Code Requests
- Withdraw Pending Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 904-JACKSONVL-FL-609576
Individual Block Request

Type of Application: ☑ New   ☐ Change   ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name:	**BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**
Headquarters Address:	████████
City, State, Zip:	████████
Contact Name:	████████
Contact Address:	████████
City,State,Zip:	████████
Phone:	████ FAX: ████ E-mail: ████@att.com

Pooling Administrator: ii

Contact Name:	**Dara Flowers**
Contact Address:	**1800 Sutter St**
City,State,Zip:	**Concord ,CA,94520**
Phone:	**925-363-8730** FAX: **925-363-7697**
E-mail:	**dara.flowers@neustar.biz**

1.2 General Information:

Check one : No LRN needed   __X__   LRN needed iii _____

NPA: __904__   LATA: __452__   OCN: iv __9417__   Parent Company's OCN __9400__

Number of Thousands-Blocks Requested :__1__

Switching Identification(Switch Entity/POI) : ^v
___JCVLFLJTRSA___

City or Wire Center Name :_____   Rate Center: ^{vi}
                                          __JACKSONVL__

Rate Center Sub Zone:_____

1.3 Dates:

Date of Application: ^{vii} _   Requested Block Effective Date: ^{viii}
01/29/2013   03/01/2013

☐ 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.

Request Expedited Treatment? (See Section 8.6) Yes _____No ___X___

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider :___**Incumbent Local Exchange Carrier (ILEC)**___(LEC, IXC, CMRS, Other)

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

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional)_____
_____

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

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____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

.☐ 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 ^{ix} ☐ Switching Id ☐ Part 1B

          ☐ OCN:Inter-company ^x ☐ Effective Date

Change block : Yes _____If Yes , list NPA-NXX-X _____

1.6 Block Return :

a) Is this block Contaminated Yes _____ 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 _____ No _____

2

d) Has this block been protected from further assignment Yes _____ No ___
—

Disconnect block : Yes _____ 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) available on the ATIS
web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the
date of this application.

███████████████   <u>Sr.</u>
                                         <u>Specialist</u> <u>01/29/2013</u>

Signature of Block Applicant   Title   Date

<u>Instructions for filling out each Section of the Part 1A form:</u>

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 [xi]. 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

3

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

Foot Notes :

[i] Identify the type of change(s) in Section 1.5.

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

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

[iv] Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

[v] This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI^{TM} code of the switch /POI.

[vi] Rate Center name must be a tariffed Rate Center.

[vii] Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

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

[ix] Select if you are the current Block Holder.

[x] 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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Pooling Administration System

🏠 ▮▮▮▮@att.com (SP)   ● Sign Out

Time : 01/29/2013 04:38:07 PM EST

Navigation menu:
- ⊞ Individual Block Requests
- ⊞ CO/NXX Code Requests
- ⊞ Withdraw Pending Requests
- ⊞ Confirm Resources in Service
- ⊞ Donate Blocks
- ⊞ Submit Forecast
- ⊞ Search Forms
- ⊞ Reports
- ⊞ User Profile

Printable Version

Appendix 3   May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level[1]
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **904-JACKSONVL-FL-609576**

Date: **01/29/2013**   OCN:**9417**   Company Name:**BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Rate Center: **JACKSONVL**

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

Name of Block Applicant: ▮▮▮▮▮▮   Signature: ▮▮▮▮▮▮

Title:**Sr. Specialist**   Telephone No.: ▮▮▮▮▮▮   FAX No.: ▮▮▮▮▮▮

E-mail ▮▮▮▮**att.com**

A. Available Numbers: ▮▮▮▮▮▮

B. Assigned Numbers: ▮▮▮▮▮▮

C. Total Numbering Resources: ▮▮▮▮▮▮

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ▮▮▮▮▮▮

List Excluded Code(s) or Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History - Previous 6 months[3]	▮▮	▮▮	▮▮	▮▮								
F. Forecast - Next 12 months[4]	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮	▮▮

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) ▮▮▮▮▮▮

5

H. Months to Exhaust[5] =

Numbers Available for Assignment to Customers(A)

$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

Block Requested	Available Numbers	Months To Exhaust
1	■■■■■■	216.616

I. Utilization[6] =

$$\frac{\text{Assigned Numbers(B) - Excluded Numbers(D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = 58.939$$

Explanation: _____

[1]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.

[2]Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

[3]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.

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

[5]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, section 52.15 (g) (3) (iii)).

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

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Pooling Administration System

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Time : 01/29/2013 04:38:21 PM EST

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- ⊞ Individual Block Requests
- ⊞ CO/NXX Code Requests
- ⊞ Withdraw Pending Requests
- ⊞ Confirm Resources In Service
- ⊞ Donate Blocks
- ⊞ Submit Forecast
- ⊞ Search Forms
- ⊞ Reports
- ⊞ User Profile

November 21, 2003   Attachment 3
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number :	**904-JACKSONVL-FL-609576**

Date of Application:	**01/29/2013**	Effective Date:	
Date of Receipt:	**01/29/2013**	Date of Response:	**01/29/2013**

Service Provider Name:	**BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**
(Telcordia ™ LERG ™ Routing Guide) OCN:	**9417**
Parent Company OCN:	**9400**

NPAC SOA SPID :

Pooling Administrator Contact Information:

Dara Flowers	Phone:	**925-363-8730**
Signature of Pooling Administrator		
Dara Flowers	Fax:	**925-363-7697**
Name (print)		
Email:	**dara.flowers@neustar.biz**	

NPA-NXX or NPA-NXX-X :	Block Assigned:	
	Block Reserved :	
	Block Reservation Expiration Date :	
	Block/Code Modified :	
	Block/Code Disconnected :	
Block Contaminated(Yes or No) :		
If Yes,enter the number of TNs contaminated :		
Switch Identification(Switch Entity/POI): [1]	**JCVLFLJTRSA**	
Rate Center:	**JACKSONVL**	
Rate Center Sub Zone:		

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X   Form Complete, request denied.

___

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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:

___

[1] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls.This must be the CLLI ™ 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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Pooling Administration System

⌂ ▮▮▮▮att.com (SP)   • Sign Out

Time : 01/29/2013 04:37:24 PM EST

⊞ 🗐Individual Block
    Requests
⊞ 🗐CO/NXX Code
    Requests
⊞ 🗐Withdraw
    Pending
    Requests
⊞ 🗐Confirm
    Resources In
    Service
⊞ 🗐Donate Blocks
⊞ 🗐Submit Forecast
⊞ 🗐Search Forms
⊞ 🗐Reports
⊞ 🗐User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)[1]

Your Utilization calculates to **58.939%**. The FCC required the utilization of **75.000%**.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

◉ Return to the Months To Exhaust Form

◉ Need to request a State Waiver

◉ Received a State Waiver

[Submit] [Cancel]

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REDACTED

Jacksonville
Utilization Summary
Report

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Jacksonville	Arlington	JCVLFLARDS0	████████████████████████				
Jacksonville	Atlantic	JCBHFLABRS0	████████████████████████				
Jacksonville	Avenues	MNDRFLAVDS0	████████████████████████				
Jacksonville	Beachwood	JCVLFLBWDS0	████████████████████████				
Jacksonville	Clay Street	JCVLFLCLDS0	████████████████████████				
Jacksonville	Ft. Caroline	JCVLFLFCDS0	████████████████████████				
Jacksonville	Ft. George	FTGRFLMARS0	████████████████████████				
Jacksonville	Int. Airport	JCVLFLIARS0	████████████████████████				
Jacksonville	Lake Forest	JCVLFLLFDS0	████████████████████████				
Jacksonville	Loretto	MNDRFLLODS0	████████████████████████				
Jacksonville	Normandy	JCVLFLNODS0	████████████████████████				
Jacksonville	Oceanway	JCVLFLOWDS0	████████████████████████				
Jacksonville	Riverside	JCVLFLRV38E	████████████████████████				
Jacksonville	San Jose	JCVLFLSJ73E	████████████████████████				
Jacksonville	San Marco	JCVLFLSMDS0	████████████████████████				
Jacksonville	San Pablo	JCBHFLSPRS0	████████████████████████				
Jacksonville	Southpoint	JCVLFLJTRSA	████████████████████████				
Jacksonville	Wesconnett	JCVLFLWCDS0	████████████████████████				

Customer Contact Information

████████████████████████████

1