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COMMISSION CLERK

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December 10, 2013

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

> Re: Docket No.: _____ Petition for Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Jacksonville exchange (San Marco)

Dear Ms. Cole:

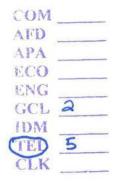
Enclosed is an original and seven copies of BellSouth Telecommunications LLC d/b/a AT&T Florida's Petition for Expedited Review of Growth Code Denial, which we ask that you file in the captioned *new* docket.

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



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the Number Pooling Administrator) for the Jacksonville exchange (San Marco)

Docket No.

Filed: December 10, 2013

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

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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's") 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 Beachwood (JCVLFLBWDS0), (MNDRFLAVDS0), 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), Wesconnett and (JCVLFLWCDS0).

5. On November 27, 2013, AT&T Florida requested additional numbering resources from NeuStar for the San Marco (JCVLFLSMDS0) switch. <u>See</u> Attachment 1. Specifically, AT&T Florida requested a full number block of 10,000 numbers to meet the request of a specific customer. Due to the customer's dialing patterns, the customer needs an NXX that doesn't end in a 0.

6. At the time of the code request, the Jacksonville exchange had a MTE of 171.60 and a utilization of 55.61%, while the MTE for the San Marco (JCVLFLSMDS0) switch was 307.73 with a utilization of 79.56%.

7. On November 27, 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. <u>See</u> Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached

2

to this Petition is the MTE and utilization rate for each switch in the Jacksonville exchange and the customers contact information and the customer's contact information. See Attachment 2.

8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. <u>See</u> 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, either 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 meet customer demand for telephone service. The new FCC rules for obtaining

3

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 as required under Florida law.

WHEREFORE, AT&T Florida requests:

1. The Commission review the decision of NeuStar to deny AT&T Florida's

request for additional numbering resources for the Jacksonville exchange; and

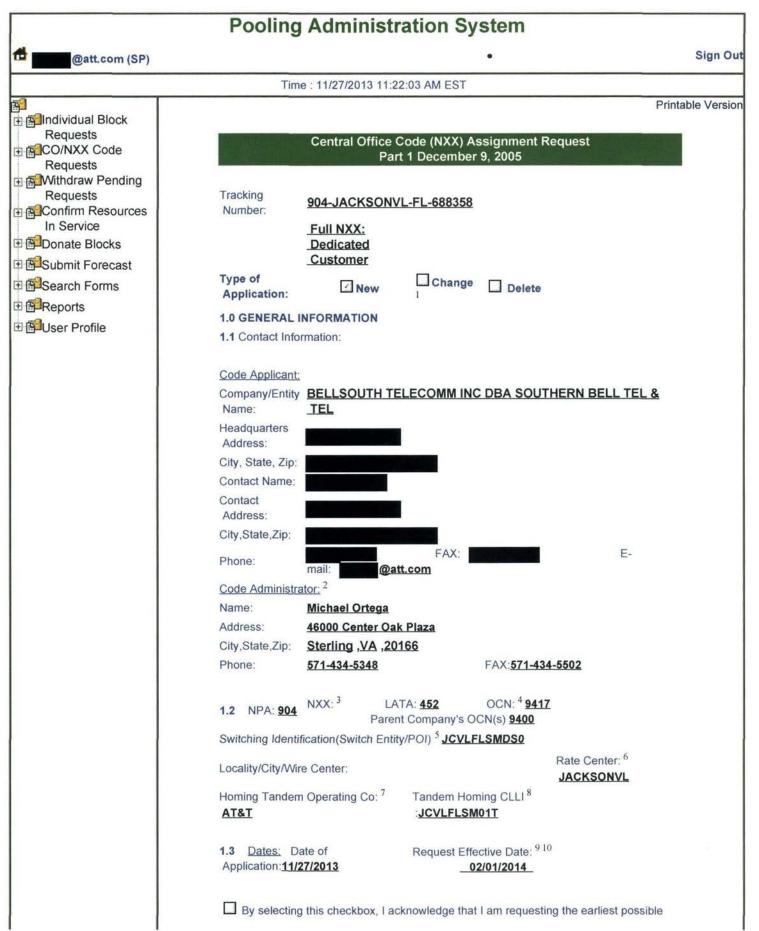
2. The Commission direct NeuStar to provide the requested numbering

resources for the Jacksonville exchange as discussed above.

Respectfully submitted this 10th day of December 2013.

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA

Suzanne Montgomery Authorized House Counsel No. 94116 Tracy Hatch Florida Bar No. 449441 c/o Gregory R. Follensbee 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5558

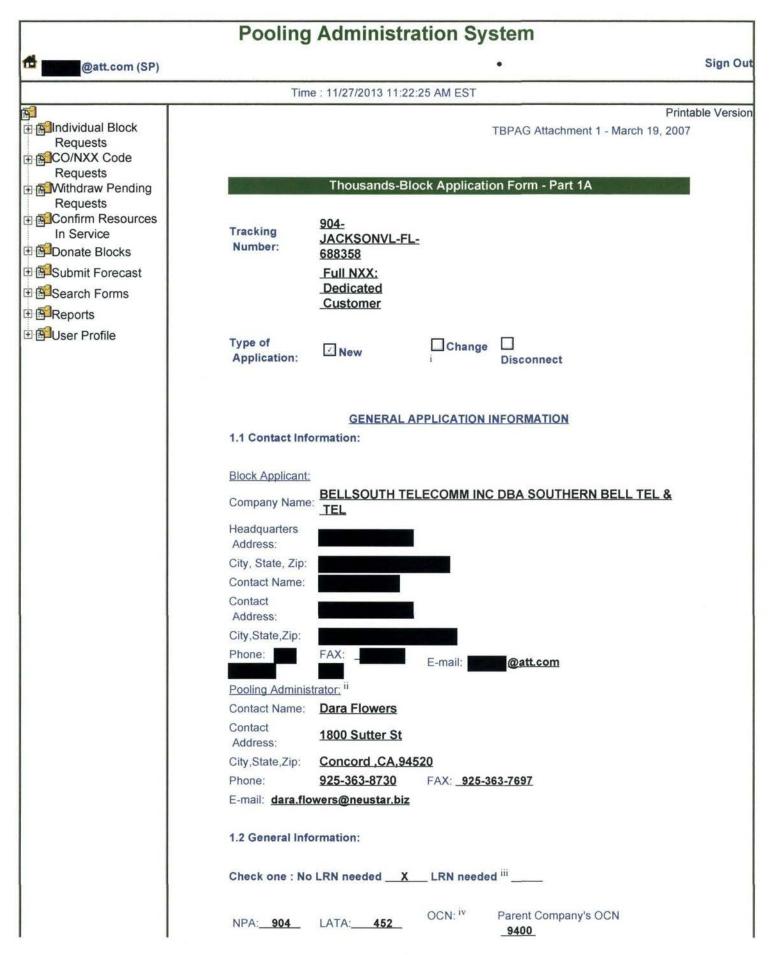


Request E	
	xpedited Treatment? YesNoX
1.4 a) Carrier (Type of company/entity requesting the code: <u>Incumbent Local Exchan</u> ILEC) (LEC, IC, CMRS, Other)
b)	Types of service: <u>Wireline</u> (e.g., Cellular - Type 2)
c)	Code Assignment Preference (Optional)
	Codes that are undesirable, if any
	Type of change(Mark all that apply)
	OCN-Intra-company ¹¹ Switching Id Rate Center Tandem Homing CLLI
	OCN-Inter-company ¹² Effective Date LATA Extend Reservation
1.5 Type	e of Request (Initial, growth, etc.) Growth
service w	code, attach(1) evidence of certification and (2) proof of ability to place code in ithin 60 days. If a growth code, attach months to exhaust worksheet.
1.6 NPA	Jeopardy Criteria Apply: 🛛 Yes 🗋 No
1.7 Cod	e request for new service (Explain):
BIRRDS.	s the code applicant's responsibility to arrange input of Part 2 information into The 45-calendar day nationwide minimum interval cut-over for BIRRDS will no il input into BIRRDS has been completed.
Comment	5.
	certify that the above information requesting an NXX code is true and to the best of my knowledge and that this application has been prepared
in accord	lance with Central Office Code (NXX) Assignment Guidelines posted to t b Site (http://www.atis.org/atis/clc/inc/incdocs.htm) as of the date of this on: ¹⁴

Signature of Code Applicant

Title Date

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	Question? Email us
	¹⁴ An incomplete form may result in delays in processing this request.
	block number pooling and will leave this field blank if it is not.
	¹² Select if you are <u>not</u> the current Code Holder ¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-
	¹¹ Select if you are the current Code Holder
	requested effective date.
	the scope of these guidelines. ¹⁰ Requests for code assignment shall not be made more than six months prior to the
	⁹ 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 access of these guidelines.
	⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
	⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
	⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
	purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM 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.)
	⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the
	⁴ 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 TM Routing Administration (TRA) on 732-699-6700.
	³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
	² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
	¹ Identify type and reason for change(s) in Section 1.4(e).



Nur	9417 nber of Thousands-Blocks Requested : <u>10</u>
	tching Identification(Switch Entity/POI): V JCVLFLSMDS0
City	Rate Center: Vi
City	or Wire Center Name : JACKSONVL
Rat	e Center Sub Zone:
1.3	Dates:
Dat	e of Application: vii <u>11/27/2013</u> Requested Block Effective Date: viii <u>02/01/2014</u>
effe in t	By selecting this checkbox, I acknowledge that I am requesting the earliest possible active date the Administrator can grant. Please note that this only applies to a reduction the Administrator's processing time, however the request will still be processed in the er received.
Req	uest Expedited Treatment? (See Section 8.6) YesNoX
1.4	Type of Service Provider Requesting the Thousands-Block :
a) IX(Type of Service Provider : Incumbent Local Exchange Carrier (ILEC) (LEC, C, 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
	If requesting a code for LRN purposes, indicate which block(s) you will be eping(the remainder of the blocks will be given to the pool)N/A
1.5	Type of Request:
	al block for rate center : YesIf Yes , attach evidence of authorization and of of capability to provide service within 60 days.
Gro	wth block for rate center : YesIf Yes , attach months to exhaust workshee
	By selecting this checkbox, I acknowledge that I am willing to accept a block in red I explicitly understand that the underlying CO code may not yet be activated in the TN and loaded in the NPAC on the block effective date.
Ту	pe of change(Mark <u>all</u> that apply)
	OCN:Intra-company ^{ix} Switching Id Part
	OCN:Inter-company ^x Effective Date
Cha	nge block : YesIf 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 :

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.





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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM 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.

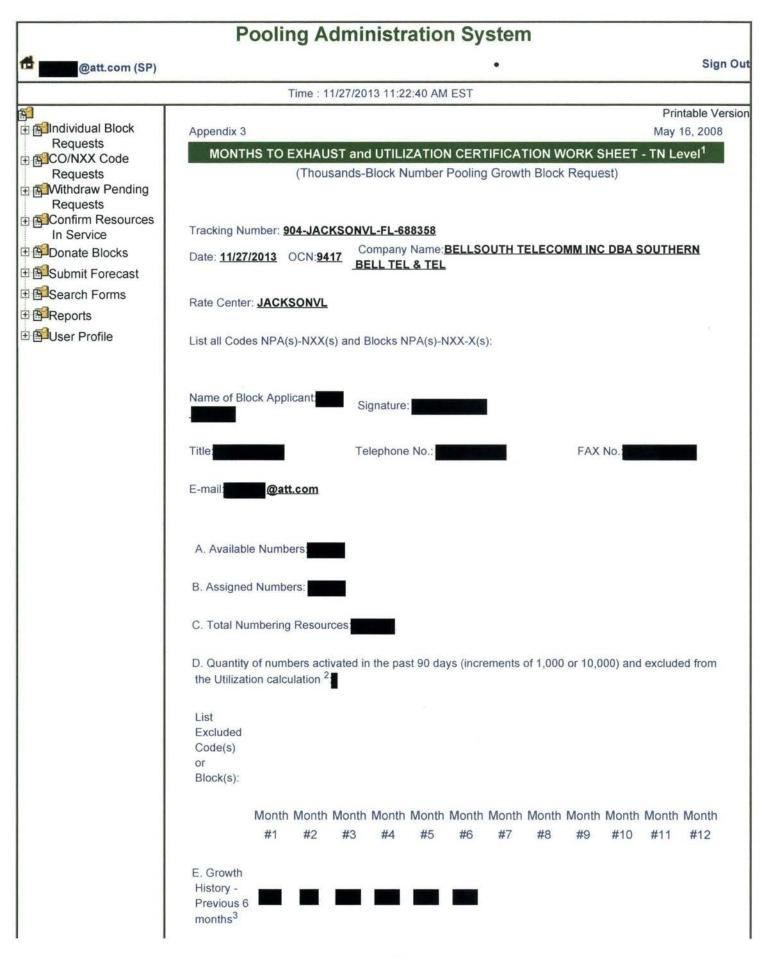
Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for 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.

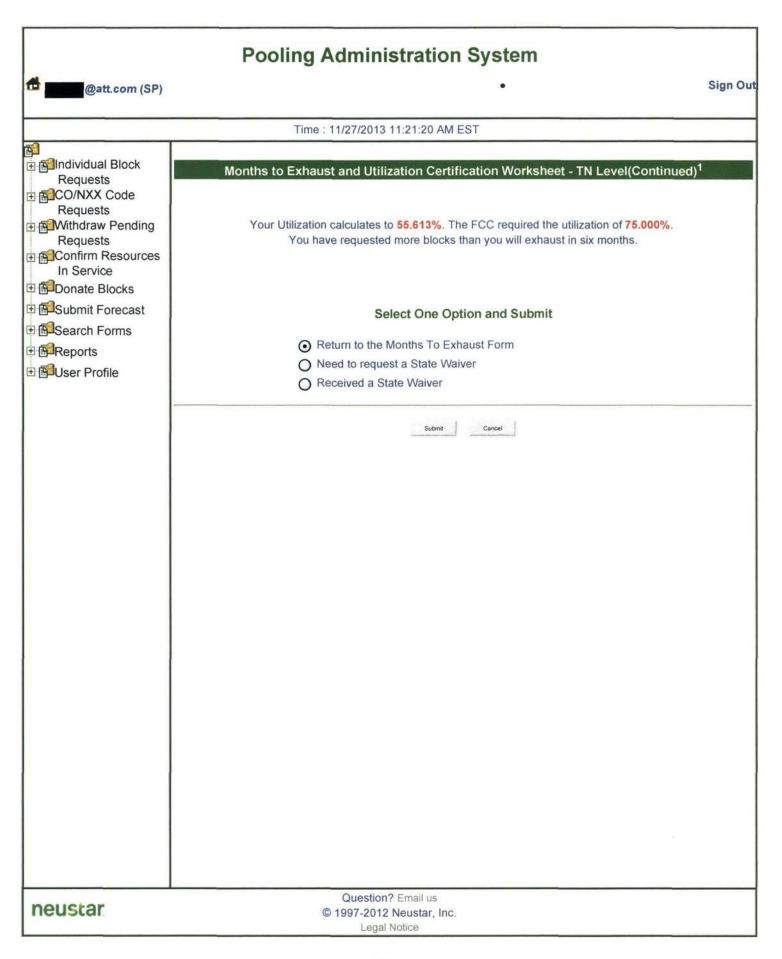
Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. 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 be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

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	Inc.
	xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies,
	* Select if you are <u>not</u> the current Block Holder
	^{ix} Select if you are the current Block Holder.
	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).
	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.
	^{vi} Rate Center name must be a tariffed Rate Center.
	^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.
	^{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).
	iii A CO Code application will also need to be submitted to the PA.
	ii The Pool Administrator is available to assist in completing these forms.
	¹ Identify the type of change(s) in Section 1.5.



	F. Forecast - Next 12 months ⁴ G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): H. Months to <u>Numbers Available for Assignment to</u> Exhaust ⁵ <u>Customers(A)</u> = Average Monthly Forecast(G) <u>Block Requested</u> <u>Available Numbers</u> <u>Months To Exhaust</u> 1 <u>11111111111111111111111111111111111</u>						
4	Utilization ⁶ Assigned Numbers(D) = Excluded X 100 = = Total Numbering Resources(C)-Excluded Numbers(D) 55.613 = Total Numbering Resources(C)-Excluded Numbers(D) Numbers(D) Explanation:						
	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))						
	Back						
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Jacksonville Utilization Summary Report

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Jacksonville	Arlington	JCVLFLARDS0	101				
Jacksonville	Atlantic	JCBHFLABRS0	20				and they
Jacksonville	Avenues	MNDRFLAVDS0	50				
Jacksonville	Beachwood	JCVLFLBWDS0	145				in the second
Jacksonville	Clay Street	JCVLFLCLDS0	293	1000 ACC - 500			
Jacksonville	Ft. Caroline	JCVLFLFCDS0	36	网络相同的			
Jacksonville	Ft. George	FTGRFLMARS0	5		Sand Indiana		
Jacksonville	Int. Airport	JCVLFLIARS0	11				
Jacksonville	Lake Forest	JCVLFLLFDS0	52				
Jacksonville	Loretto	MNDRFLLODS0	83				
Jacksonville	Normandy	JCVLFLNODS0	63			Share and	
Jacksonville	Oceanway	JCVLFLOWDS0	38		al Scannardis		
Jacksonville	Riverside	JCVLFLRV38E	61				
Jacksonville	San Jose	JCVLFLSJ73E	128				
Jacksonville	San Marco	JCVLFLSMDS0	143				
Jacksonville	San Pablo	JCBHFLSPRS0	48		nd a desaut		
Jacksonville	Southpoint	JCVLFLJTRSA	70	Sale of the			
Jacksonville	Wesconnett	JCVLFLWCDS0	107				

Customer Contact Information

