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March 7, 2018

VIA Overnight Delivery

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

RE: Petition of MCImetro Access Transmission Services Corp. d/b/a Verizon
Access Transmission Services For Expedited Review of Neustar's Denial of
Application for Numbering Resources

Dear Ms. Stauffer:

Pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida
Administrative Code, MCImetro Access Transmission Services Corp. d/b/a Verizon
Access Transmission Services ("Verizon Business") hereby makes a claim of
confidentiality for information contained in Exhibits A and B attached to the above-
referenced Petition. Exhibit A concerns confidential information that reflects the
number of telephone numbers being assigned in the Sanford, Florida rate center,
and Exhibit 2 concerns a customer request for the assignment of telephone
numbers that Verizon Business regards as confidential.

One highlighted copy of the confidential information is enclosed in a sealed
envelope. Two redacted copies of the information are also included.

If you have any questions regarding this information, please contact Kathy Buckley
on 304-356-3194 or by email at Kathy.L.Buckley@verizon.com.

Sincerely,

Attachments

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM** 1
- CLK _____

RECEIVED-FPSC
2018 MAR -8 AM 11:04
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of

Petition of MCImetro Access Transmission) Docket No.
Services Corp. for Expedited Review of) Filed: March 7, 2018
Neustar's Denial Of Application for)
Numbering Resources)

**PETITION OF MCIMETRO ACCESS TRANSMISSION SERVICES CORP.
FOR EXPEDITED REVIEW OF NEUSTAR'S DENIAL OF APPLICATION
FOR NUMBERING RESOURCES**

MCImetro Access Transmission Services Corp. d/b/a Verizon Access

Transmission Services ("Verizon Business") respectfully petitions the Florida Public Service Commission ("Commission") to review the Number Pooling Administrator's denial of Verizon Business's application for use of central office code resources in the Sanford, Florida rate center and to enter an order as soon as practicable granting Verizon Business a waiver using the "safety valve" process set forth by the Federal Communications Commission ("FCC").¹ In support of its Petition, Verizon Business states the following:

1. Verizon Business is a telecommunications company that provides, among other things, local exchange telecommunications services in the Sanford, Florida rate center.
2. NeuStar, Inc. ("NeuStar") is an independent, non-government entity that is responsible for administering and managing numbering resources in pooling areas.²

¹ *In the Matter of Numbering Resource Optimization et al.*, CC Docket Nos. 99-200, 96-98, 95-116. FCC 01-362, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket 99-200 (rel. December 28, 2001), at ¶61; 47 C.F.R. §52.15(g)(4).

² See 47 C.F.R. § 52.13 (a) & (b).

3.

On January 26, 2018, Verizon Business³ submitted to NeuStar a Thousands-Block Application Form – Part 1A and Months To Exhaust (“MTE”) Report (both attached as Exhibit A), requesting the 407-807-3 Thousands-Block of telephone numbers in the Sanford, Florida rate center for the purpose of meeting the request of a business customer (attached as Exhibit B). The customer is requesting a contiguous range of 120 direct inward dial (“DID”) telephone numbers. Due to its company policy, it cannot accept non-contiguous DIDs, nor DIDs with NPA-NXX-8XXX or NPA-NXX-9XXX.

4.

At the time of the filing of the numbering resource request, the Sanford, Florida rate center had an MTE of 26.75 months for the relevant blocks and a utilization of 87.29%.

5.

On January 26, 2018, NeuStar denied Verizon Business’s request on the grounds that Verizon did not meet the MTE and utilization requirements. NeuStar’s response is attached as Exhibit C.

6.

Verizon Business cannot use its available inventory of numbering resources to meet this customer’s request because the existing inventory does not have 120 contiguous telephone numbers.

7.

In FCC Order 01-362, released December 28, 2001 (“FCC Order”), the FCC clarified the authority delegated to state commissions and addressed the “safety valve” process that permits carriers that have not met the utilization criteria to obtain additional numbering resources.

³ Although the January 26, 2018 request to NeuStar was made in the name of MCI WorldCom Communications, Inc. - FL, the service is being provided by Verizon Business.

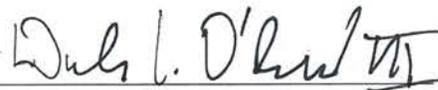
8. Verizon Business seeks the Commission's review of the NeuStar decision to withhold numbering resources from Verizon Business because it violates the intent and requirements of the FCC Order, which permits carriers to access numbering resources to meet customer demands upon a sufficient showing of need.

9. Verizon Business respectfully requests the Commission grant its application for relief and direct NeuStar to provide the requested numbers to Verizon Business so that it may be assigned the 407-807-3 block of consecutive numbers needed to meet its customer's service request.

WHEREFORE, Verizon Business respectfully requests that the Commission:

1. Enter an Order granting Verizon Business relief for a new 1,000 number block assignment, in accordance with the FCC's safety valve process; and
2. Grant the requested relief as soon as possible to avoid any negative impact on the customer's network upgrades.

Respectfully submitted, this the 7th day of March, 2018.



Dulaney L. O'Roark III
One Verizon Place
Alpharetta, GA 30004
Telephone: 678-339-5081
de.oroark@verizon.com

Attorney for Verizon Business

Tracking Number: 321-SANFORD-FL-1073377Thousands-Block Application Form - Part 1A
Revised: January 4, 2016Individual Block
RequestType of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company

Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

Headquarters

Address: 741 zeckendorf blvdCity: Garden City State: NY ZIP: 11530

Contact

Name: Cassandra HENDERSON

Contact

Address: 9201 north central expwyCity: dallas State: TX ZIP: 75236Phone: 214-261-6935 Fax:E-mail: cassandra.l.henderson@verizon.comPooling Administrator:ⁱⁱ

Contact

Name: Dara Flowers

Contact

Address: 1800 Sutter StCity: Concord State: CA ZIP: 94520Phone: 925-363-8730 Fax: 925-363-7697E-mail: dara.flowers@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

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 _____
- 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

cassandra HENDERSON
Signature of Block Applicant

specialist
Title

01/26/2018
Date

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 email.

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 Technologies, Inc. dba iconectiv (iconectivTM) LERGTM Routing Guidexi. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a fourcharacter alphanumeric identifier assigned by the iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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.

Footnotes:

iIdentify the type of change(s) in Section 1.5.

iiThe Pool Administrator is available to assist in completing these forms.

iiiA CO Code application will also need to be submitted to the PA.

ivOperating 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).

vThis 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.

viRate Center name must be a tariffed Rate Center.

viiAcknowledgment 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).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Common Language® and Telcordia® are registered trademarks and CLLITM, LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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.

^{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 PSTN 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 Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Months To Exhaust Report 1/25/2018

ReportDate: 1/25/2018
 State: FL
 Rate Center: SANFORD
 OCN: 7448
 File Downloaded Time: 1/26/2018 5:24:58 PM

MTE	BLOCK_1	BLOCK_2	BLOCK_3	BLOCK_4	BLOCK_5	BLOCK_6	BLOCK_7	BLOCK_8	BLOCK_9	BLOCK_10
Date:	Jan 25 2018 12:00AM									
OCN:		7448								
Company Name:										
State	FL									
Rate Center:	SANFORD									
List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s):	[321-233]-7,8,[407-547]-2,3,A,[407-548]- 0,2,5,8,9,A,[407-549]-3,4,5,7,A,[407-710]- 3,4,[407-732]-2,A									
Name Of Authorized Representative of Company Applicant:										
Title:										
Telephone No.:										
FAX No.:										
E-Mail:										
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):										
E. Growth History - Previous 6 months [2] :										
Month#01										
Month#02										
Month#03										
Month#04										
Month#05										
Month#06										
F. Forecast - Next months1-12 [3]:										
Month #01										
Month #02										
Month #03										
Month #04										
Month #05										
Month #06										
Month #07										
Month #08										
Month #09										
Month #10										
Month #11										
Month #12										
G. Average Monthly Forecast - (Sum of months #1-6 (Item F above) divided by 6):										
H. Months to Exhaust [4] (Avail #s[A] / Avg mthly Forecast[G])									26.75	
I. Utilization [5] - (Assigned#s[B]- / (Total #s[C] -Excluded #s[D])									87.29%	
Explanation:										

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Proprietary Disclaimer

The 'TNRV Reporting Engine' system is provided for the use of employees and other authorized users to assist them in carrying out Company business, and is to be solely used for company business. It is a proprietary system and is subject to monitoring at the Company's discretion. Your use of this system implies consent. The Company treats all information and messages transmitted over these systems as business messages, which may be monitored by the Company. Any downloaded information must only be used to carry out Company business. Any other use of the system or data violates the Code of Business Conduct.

REDACTED

From: dara.flowers@neustar.biz [mailto:dara.flowers@neustar.biz]
Sent: Friday, January 26, 2018 4:30 PM
To: Code Administrators; Henderson, Cassandra L
Cc: PA_Part3@neustar.biz
Subject: [E] , 321-SANFORD-FL-1073377 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 26 January 2018

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 321-SANFORD-FL-1073377

Date of Application: 01/26/2018 Effective Date: _____

Date of Receipt: 01/26/2018 Date of Response: 01/26/2018

Service Provider Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

(LERG™ Routing Guide¹) OCN: 7448

Parent Company OCN: 7229

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 (1-1000): _____

Switch Identification (Switching/POI)²: ORLEFLIQDS0

Rate Center: SANFORD

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 Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

