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FPSC - COMMISSION CLERK

January 29, 2019

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

**REDACTED**

**Re: Docket No.:** \_\_\_\_\_  
**Petition for Expedited Review of Growth Code Denials by the Number  
Pooling Administrator for the Tampa Central Rate Center**

Dear Ms. Teitzman:

Enclosed is an original and seven copies of Teleport Communications America, LLC-FL's ("TCAL's") Petition for Expedited Review of Growth Code Denial, which we ask that you file in the above 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 enclosed Certificate of Service.

Sincerely,

Tracy W. Hatch

TWH/ns  
Enclosures

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL 1
- IDM 6
- CLK \_\_\_\_\_

RECEIVED-FPSC  
2019 JAN 29 PM 4:20  
COMMISSION  
CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Re: Petition for Expedited Review of Growth ) Docket No.  
Code Denial by the Number Pooling Administrator ) Filed: January 29, 2019  
For the Tampa Central rate center )

**PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL**

Teleport Communications America, LLC - FL (TCAL) 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-01-1873-PCO-TL, petitions the Commission to review the Pooling Administrator's ("Somos") denial of TCAL's request for additional numbering resources in the Tampa Central rate center. In support of this petition, TCAL states:

**PARTIES**

1. TCAL is a corporation organized and formed under the laws of the State of New Jersey.
2. Somos 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 Somos's decision to deny numbering resources to the appropriate regulatory authority.

**BACKGROUND AND REQUEST FOR RELIEF**

4. The Tampa Central rate center is served by TAMPFLXAXJZ and TAMQFLRYDSO. While TCAL owns 11 blocks (813-981-6, 813-983-2, 4, 5, 6 and 813-990-1 thru 6) that meet the requested NPA-9XX format, there are only 78 numbers available 813-981-6.

5. On January 23, 2019, TCAL requested 1000 consecutive numbers, from Somos, for the Tampa Central rate center, to satisfy the customer's request.
6. At the time of the request, the Tampa Central rate center had a month-to-exhaust (MTE) of 38.7 months and utilization of ~ 85.6%.
7. January 23, 2019, Somos denied TCAL's request because TCAL had not meet the MTE criteria, notwithstanding the fact that TCAL 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 customer 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 Somos's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(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 the specific number format to meet the customer's specific request. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.
10. TCAL requests that the Commission's reverse Somos's decision to withhold numbering resources on the following grounds:
  - (a) Somos's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.
  - (b) As a result of Somos's denial of the request for additional numbering resources, TCAL is unable to provide telecommunications services to its customer as required under Florida law.



WHEREFORE, TCAL requests:

1. The Commission review the decision of Somos to deny TCAL's request for additional numbering resources for the Tampa Central rate center; and
2. The Commission direct Somos (Pooling Administrator effective 1/1/19) to provide the requested numbering resources for the Tampa Central rate center as discussed above. There are no NPA-9XX blocks in the Tampa Central inventory pool so a new code will need to be opened toN satisfy the customer's request.

Respectfully submitted

January 29, 2019.

Teleport Communications America, LLC

A handwritten signature in blue ink, appearing to read "Tracy Hatch", is written over a horizontal line.

TRACY HATCH  
675 West Peachtree Street, NW  
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Atlanta, Georgia 30308  
404-927-5291  
Email: [th9467@att.com](mailto:th9467@att.com)

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 813-TAMPACEN-FL-1138107

Date of Application: 01/23/2019 Effective Date: \_\_\_\_\_

Date of Receipt: 01/23/2019 Date of Response: 01/23/2019

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

(LERG™ Routing Guide¹) 8300

OCN: \_\_\_\_\_

Parent Company OCN: 7125

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Dara Flowers Phone: 925-420-0367

Signature of Pooling Administrator

Dara Flowers Fax: 925-420-0377

Name (print)

Email: dflowers@somos.com

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: TAMPFLXAXJZ

Rate Center: TAMPACEN

Form complete, request denied.

Explanation:

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

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**Request Withdrawn.**

**Explanation:**

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**Assignment Activity Suspended by Administrator.**

**Explanation:**

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**Remarks:**

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

<sup>2</sup> 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.

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 813-TAMPACEN-FL-1138107

Date: Wednesday,  
January 23, 2019

OCN:8300

Company Name:TELEPORT COMMUNICATIONS  
AMERICA, LLC - FL

Rate Center: TAMPACEN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>:NPA NXX BLOCK ID 813 207 1  
813 227 4 813 241 3 813 269 6 813 302 2 813 302 3 813 302 4 813 302 5 813 302 6 813 313 4 813  
337 4 813 337 5 813 375 5 813 375 6 813 375 7 813 375 8 813 375 4 813 392 A 813 392 4 813 392  
5 813 393 4 813 393 5 813 393 2 813 393 A 813 393 3 813 402 5 813 402 7 813 424 3 813 424 4  
813 424 5 813 425 A 813 425 8 813 439 5 813 439 6 813 439 A 813 462 4 813 462 7 813 465 6 813  
465 5 813 465 7 813 466 6 813 496 2 813 496 3 813 496 5 813 496 6 813 497 A 813 497 6 813 497  
7 813 519 A 813 519 1 813 519 2 813 559 A 813 559 4 813 559 5 813 559 6 813 574 5 813 577 8  
813 577 7 813 577 5 813 577 4 813 577 6 813 741 4 813 741 5 813 741 6 813 741 7 813 741 8 813  
804 5 813 804 6 813 868 8 813 981 6 813 983 4 813 983 5 813 983 6 813 983 2 813 990 6 813 990  
1 813 990 2 813 990 3 813 990 4 813 990 5

Name of Block Applicant: [REDACTED] Signature: [REDACTED]

Title: [REDACTED] Phone: [REDACTED] Fax: [REDACTED]

E-Mail [REDACTED]

A. Available Numbers [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: 0

List  
Excluded



Code(s) or  
Block(s):

Month Month Month Month Month Month Month Month Month Month Month Month  
1 2 3 4 5 6 7 8 9 10 11 12

E. Growth  
History -  
Previous 6  
months<sup>4</sup>

[REDACTED]

F. Forecast  
- Next 12  
months<sup>5</sup>

[REDACTED]

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

[REDACTED]

H. Months  
to Exhaust<sup>6</sup>  
=

Numbers Available for Assignment to  
Customers (A)

Average Monthly Forecast (G)

Block Requested

[REDACTED]

Available Numbers

[REDACTED]

Months To Exhaust

[REDACTED]

I.  
Utilization<sup>7</sup>  
=

Assigned Numbers (B)

X 100 =

[REDACTED]

Total Numbering Resources (C)-Excluded  
Numbers (D)

Explanation: \_\_\_\_\_

<sup>1</sup>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.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>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).



<sup>4</sup>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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

Central Office Code Assignment Guidelines (COCAG)  
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking Number: 813-TAMPACEN-FL-1136107

Full NXX: Pool Replenishment

Type of Application:  New  Change<sup>1</sup>  
 Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Headquarters Address: [REDACTED]

City, State, Zip: [REDACTED]

Contact Name: [REDACTED]

Contact Address: [REDACTED]

City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]

Phone: [REDACTED] Fax: [REDACTED]

E-mail: [REDACTED]

Code Administrator:<sup>2</sup>

Name: Patricia Soderland

Address: 2411 Dulles Corner Park Suite 250

City: Herndon State: VA ZIP: 20171

Phone: 571-363-3828 Fax: 571-363-3838

1.2 NPA: 813 NXX:<sup>3</sup> LATA: 952 OCN:<sup>4</sup>8300  
Parent Company's OCN(s) 7125

Switching Identification (Switching Entity/POI) <sup>5</sup>TAMPFLXAXJZ

Locality/City/Wire Center: Rate Center:<sup>6</sup>TAMPACEN

Homing Tandem Operating Co.<sup>7</sup>: BELL SOUTH Tandem Homing  
CLLI<sup>TM8</sup>: TAMPFLXA03T

1.3 Dates

Date of Application: 01/23/2019

Requested Effective Date: 9,10  
03/30/2019

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 Yes  No

Expedite Documentation must be provided if "Request Expedite" = Yes  
Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): CAP  
OR CLEC

b) Type of service (e.g., Cellular - Type 2): Wireline

c) Code Assignment Preference (Optional) [REDACTED]

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)  
 OCN-Intra-company<sup>11</sup>  Switching Id  Rate Center  Tandem Homing  
CLLI  
 OCN-Inter-company<sup>12</sup>  Effective Date  LATA  Extend Reservations

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: <sup>13</sup>  Yes  No

1.6 NPA Jeopardy Criteria Apply:  Yes  No

1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_


1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not

begin until input into BIRADS has been completed.

Comments:

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I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application<sup>14</sup>.

  
Signature of Code Applicant

  
Title

  
Date

- <sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).
- <sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- <sup>3</sup>The NXX field is required for any code request in which there is a change or the NXX is being returned.
- <sup>4</sup>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 iconectiv Telcordia<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.
- <sup>5</sup>This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language<sup>®</sup> Location Code (CLLI<sup>TM</sup> Code) of the applicant's switch or POI. Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.
- <sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.
- <sup>7</sup>Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- <sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
- <sup>9</sup>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 scope of these guidelines.
- <sup>10</sup>Requests for code assignment shall not be made more than six months prior to the requested effective date.
- <sup>11</sup>Select if you are the current Code Holder



<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup>An incomplete form may result in delays in processing this request.