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DOCUMENT NO. 10963-2019
FPSC - COMMISSION CLERK

November 15, 2019

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

RECEIVED-FPSC
2019 NOV 15 PM 4:42
COMMISSION
CLERK

Re: Docket No.: 20190206
Petition for Expedited Review of Growth Code Denial by the Number
Pooling Administrator for the Inverness Rate Center

REDACTED

Dear Mr. 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 Hatch

TWH/ns
Attachments

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL 1
- IDM 6
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: November 15, 2019
For the Inverness 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 Inverness 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 Inverness rate center is served by the OCALFLZAX4Z switch where 352-382-9 has ~880 numbers available and 352-423-5 has ~550 numbers available.
5. On October 28, 2019, TCAL requested 3000 consecutive numbers from Somos, for the Inverness rate center, to satisfy the customer’s request.
6. At the time of the request, the Inverness rate center had a month-to-exhaust (MTE) of 6.9 months and utilization of 2.7%.
7. October 28, 2019, Somos denied TCAL’s request because TCAL had not met the utilization, 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.

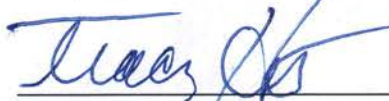
8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review Somos's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).
9. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have 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 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 Inverness rate center; and
2. The Commission direct Somos (Pooling Administrator effective 1/1/19) to provide the requested numbering resources for the Inverness rate center as discussed above. Given there are not 3000 consecutive numbers in the Industry pool, a new code will need to be opened.

Respectfully submitted this 15th Day of November, 2019.

Teleport Communications America, LLC



TRACY HATCH
150 South Monroe Street
Suite 400
Tallahassee, FL 32301
(850) 577-5505
email: th9467@att.com

ATT-1

From: dflowers@somos.com
Sent: Monday, October 28, 2019 1:53 PM
To:
Cc: PA_Part3@somos.com
Subject: , 352-INVERNESS-FL-1193828 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 28 October 2019

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 352-INVERNESS-FL-1193828

Date of Application: 10/28/2019 Effective Date: _____
Date of Receipt: 10/28/2019 Date of Response: 10/28/2019

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL
(LERG™ Routing Guide¹)
OCN: 8300

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: OCALFLXAX4Z
Rate Center: INVERNESS

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:

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

²This 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 (TBPA) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 352-INVERNESS-FL-1193828

Date: Monday, October 28, 2019 OCN: 8300 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Rate Center: INVERNESS

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 352-382-9, 352-423-5,

Name of Block Applicant: [Redacted]
Brown

Signature: [Redacted]

Title: [Redacted]
[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 ³: [Redacted]

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

Month	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 months⁴
[Redacted]

F. Forecast
- Next 12
months⁵



G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):501.0

H. Months
to Exhaust⁶
=
Numbers Available for Assignment to
Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
■	■	■
■	■	■
■	■	■

I.
Utilization⁷
=
Assigned Numbers (B) X 100 = ■

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

Explanation: _____

¹A 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.

²List all numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as

needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired 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).

⁶Net 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.

⁷Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g) (4)(ii)).

Tracking Number: **352-INVERNESS-FL-1193828**

Thousands-Block Application Form - Part 1A
Revised: January 4, 2016

Individual Block Request

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: [REDACTED]
Headquarters Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Contact Name: [REDACTED]
Contact Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
E-mail: rb2548@att.com

Pooling Administrator:ⁱⁱ

Contact Name: **Dara Flowers**
Contact Address: **1800 Sutter St**
City: **Concord** State: **CA** ZIP: **94520**
Phone: **925-420-0367** Fax: **925-420-0377**
E-mail: dflowers@somos.com

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 352 LATA: 454 OCN^{iv}: 8300 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI^v): OCALFLXAX4Z

Rate Center^{vi}: INVERNESS

1.3 Dates:

Date of Application^{vii}:
10/28/2019

Requested Effective Date^{viii}:
11/28/2019

Requested Expedited Treatment? (See Section 8.6) Yes ___ No X

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (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 _____
- 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.

[Redacted]	[Redacted]	[Redacted]
Signature of Block Applicant	Title	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 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 Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide^{xi}. 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 four-character alphanumeric identifier assigned by the iconectiv™ 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.
- ^{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.
- ^xSelect 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.