AT&T

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January 29, 2024

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

REDACTED

RECEIVED-FPSC
2024 JAN 29 PM 2:17
COMMISSION CLERK

Re: Docket No.: 20240024
Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Puntagorda Rate Center

Dear Mr. Teitzman:

Enclosed is an original and seven copies of Teleport Communications America, LLC ("TCAL-FL'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 attached Certificate of Service.

Sincerely,

Tracy Hatch

TWH/mw
Attachments

COM ___
AFD ___
APA ___
ECO ___
ENG ___
GCL 1
IDM 6
CLK ___

Re: Petition for Expedited Review of Growth	)	Docket No.
Code Denial by the Number Pooling Administrator	)	Filed: January 29, 2024
For the Punta Gorda rate center	)	

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Teleport Communications America, LLC (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 ("NANPA") denial of TCAL's request for additional numbering resources in the Punta Gorda 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. NANPA 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 NANPA's decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. The Punta Gorda rate center is served by only 1 switch (FTMYFLXAX1Z). TCAL owns 1 block: 941-676-6; and 490 available numbers respectively.

5. On January 2, 2024, , TCAL requested 15 consecutive numbers in NPA 941 that the last 4 digits start with a 5. See Attachment 1.

6. At the time of the request, the Punta Gorda rate center month-to-exhaust is 2.80 months and utilization is 51.0%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for the Punta Gorda exchange is attached. See Attachment 2. Pursuant to Commission Order No PSC-01-1973-PCO-TL the customer contact information is attached. See Attachment 3.

7. On January 2, 2024, NANPA denied TCAL's request because TCAL had not met the utilization threshold, notwithstanding the fact that TCAL is unable to provide the numbering resources requested by the specific customer. See Attachment 1.

8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NANPA'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 NANPA's decision to withhold numbering resources on the following grounds:

    (a) NANPA's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.

    (b) As a result of NANPA's denial of the request for additional numbering resources, TCAL is unable to provide telecommunications services to its customer as required under Florida law.
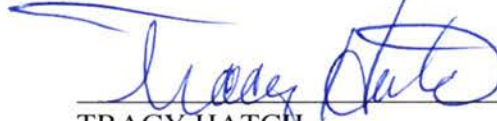
WHEREFORE, TCAL requests:

1. The Commission review the decision of NANPA to deny TCAL's request for additional numbering resources for the Punta Gorda rate center; and

2. The Commission direct NANPA to provide the requested numbering resources for the Punta Gorda rate center as discussed above.

Respectfully submitted January 29, 2024.

Teleport Communications America, LLC

TRACY HATCH
150 South Monroe St.
Suite 400
Tallahassee, FL 32301
850-577-5505
Email: th9467@att.com

Tracking Number: **941-PUNTAGORDA-FL-1916719**

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

**Full NXX: Pool
Replenishment**

Type of Application: ☑ New   ☐ Change [i]   ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name:	██████████████████
Headquarters Address:	██████████████
City:	██████ State: ██ ZIP: ██
Contact Name:	██████
Contact Address:	██████████████
City:	██████ State: ██ ZIP: ██
Phone:	██████ Fax: ██████
E-mail:	██████

Pooling Administrator:[ii]

Contact Name:	**David Morgan**
Contact Address:	**Two Tower Center Boulevard, 20th Floor**
City:	**East Brunswick** State: **NJ** ZIP: **08816**
Phone:	**571-363-3823** Fax: **571-363-3838**
E-mail:	**dmorgan@nanpa.com**

1.2 General Information:

Check one : No LRN needed __X__ LRN needed[iii]:_____

NPA:__941__   LATA:___939___   OCN[iv]:__█__   Parent Company's OCN _█_
Number of Thousands-Blocks Requested :_█_
Switch Identification (Switching Entity/POI[v]): ___FTMYFLXAX1Z___
Rate Center[vi]:____PUNTAGORDA__

1.3 Dates:

Date of Application[vii]:__01/02/2024__   Requested Effective Date[viii]:   __03/08/2024__

Requested Expedited Treatment? (See Section 8.6) Yes __X__No _____
Expedited Explanation: **NO weekend date please. We are serving as our own AOCN, and will waive the entire 7 calendar day interval to update BIRRDS.**

☑ 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 :__█__(LEC, IXC, CMRS, Other)
b) Primary Type of Service Blocks to be used for :__█__
c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____941-xxx-5_____
d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____666_____
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) _____N/A_____

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 a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

███████████   ████████████████   ██████████

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 (SP) 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 (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2   Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP 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^{TM} Routing Guide[xi]. The Operating Company Number (OCN) assigned to the SP 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 (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3   The date the Service Provider (SP) 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 (SP) 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. SPs 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 (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are 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 (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-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:

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

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

[iii]A Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

[iv]Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) 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 Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI^{TM} Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall 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 Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI^{TM}, CLLI^{TM}, LERG^{TM} Routing Guide and TPM^{TM} Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Pooling Administrator's Response/Confirmation - Part 3A
Revised: October 31, 2019

Tracking Number :   **941-PUNTAGORDA-FL-**
                                 1916719

Date of Application: **01/02/2024**   Effective Date:
Date of Receipt: **01/02/2024**   Date of Response: **01/02/2024**

Service Provider Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - FL**
(LERG^{TM} Routing Guide[1]) OCN: **8300**
Parent Company OCN: **7125**

NPAC SOA SPID :

Pooling Administrator Contact Information:
David Morgan   Phone: **571-363-3823**
Signature of Pooling Administrator
David Morgan   Fax: **571-363-3838**
Name (print)
Email: **dmorgan@nanpa.com**

      NPA-NXX or NPA-   Block Assigned:
____ NXX-X :   _____
                                                     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]: **FTMYFLXAX1Z**

Rate Center: **PUNTAGORDA**

X   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 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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[1] iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

[2] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level[1] - Appendix 2
Revised: October 31, 2019
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **941-PUNTAGORDA-FL-1916719**

Date: **Tuesday, January 2, 2024**   OCN:**8300**   Company Name:**TELEPORT COMMUNICATIONS AMERICA, LLC - FL**

Rate Center: **PUNTAGORDA**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)[2]:**941-676-6,**

Name of Block Applicant: ███████   Signature: ███████

Title: ███████   Phone: ███████   Fax: ███████

E-Mail: ███████

A. Available Numbers[3]: ███

B. Assigned Numbers: ███

C. Total Numbering Resources[4]: ███

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation[5]: ███

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[6]	■	■	■	■	■	■						
F. Forecast - Next 12 months[7]	■	■	■	■	■	■	■	■	■	■	■	■

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)[8]: ■

$$H.\ \text{Months to Exhaust}^9 = \frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

Block Requested	Available Numbers	Months To Exhaust
■	■	■

$$I.\ \text{Utilization}^{10} = \frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \blacksquare$$

Explanation: _____

[1]A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

[2]List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources 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.

[3]The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-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).

[4]The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-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).

[5]Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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).

[6]Net change in Telephone Numbers (TN) 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.

[7]Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

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

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

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