



Manuel A. Gurdian
General Attorney

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5561
F: (305) 577-4491
manuel.gurdian@att.com

RECEIVED-FPSC
09 JUL 15 PM 4:23
COMMISSION
CLERK

July 15, 2009

090370-TL

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

**Re: Petition for Expedited Review of Growth Code
Denial by the Number Pooling Administrator for the
Jacksonville Exchange (Loretto)**

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. 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,


Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

COM _____
ECR _____
GCL 2 _____
OPC _____
RCP _____
SSC _____
SGA _____
ADM _____
CLK 1 _____

DOCUMENT NUMBER-DATE
07163 JUL 15 09

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for Expedited Review of Growth Code
Denial by the Number Pooling Administrator for the
Jacksonville Exchange (Loretto)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail this 15th day of July, 2009 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Thomas Foley
NPA Relief Planner
820 Riverbend Blvd.
Longwood, Florida 32779-2327
Tel. No.: (407) 389-8929
Fax. No.: (407) 682-1108
thomas.foley@neustar.com



Manuel A. Gurdian

DOCUMENT NUMBER-DATE

07163 JUL 15 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator)
for the Jacksonville exchange (Loretto))
_____) Filed: July 15, 2009

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

BellSouth Telecommunications, Inc. 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-01-1873-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NeuStar”) 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

DOCUMENT NUMBER-DATE

07163 JUL 15 8

FPSC-COMMISSION CLERK

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 (MNDRFLAVDS0), Beachwood (JCVLFLBWDS0), 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), and Wesconnett (JCVLFLWCDS0).

5. On June 26, 2009, AT&T Florida requested additional numbering resources from NeuStar for the Loretto (MNDRFLLODS0) switch. See Attachment 1. Specifically, AT&T Florida requested one (1) block to meet the request of a specific customer for 300 consecutive numbers in the format of NPA NXX-6XX.

6. At the time of the code request, the Jacksonville exchange had a MTE of 83.22 and a utilization of 69.57%, while the Loretto (MNDRFLLODS0) switch had a MTE of 35.68.

7. On June 26, 2009, 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. See

Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Jacksonville exchange 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. 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 a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar nor 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 FCC rules for obtaining 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 CLECs only have to meet the MTE requirement in 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 15th day of July, 2009.

AT&T FLORIDA



E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

739186

Pooling Administration System

[REDACTED]@ATT.COM (SP) ● Sign Out

Time : 06/26/2009 04:02:22 PM EDT Printable Version
May 16, 2008

Appendix 3

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

Tracking Number: **904-JACKSONVL-FL-302146**

Date: **06/26/2009** OCN: **9417** Company Name: **BELLSOUTH SO BELL**

Rate Center: **JACKSONVL**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

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

Title: [REDACTED] Telephone No.: [REDACTED]

FAX No.: [REDACTED]

E-mail: [REDACTED]@ATT.COM

A. Available Number: [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 ²: [REDACTED]

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 ³											
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
F. Forecast - Next 12 months ⁴											
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **3217.667**

H. Months to Exhaust⁵
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested
1

Available Numbers
[REDACTED]

Months To Exhaust
[REDACTED]

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= [REDACTED]

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.

²Quantity 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).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

[Back](#)

Question? Email us
© 1997-2012 NeuStar, Inc.
Legal Notice

Pooling Administration System	
<div style="display: flex; justify-content: space-between;"> @ATT.COM (SP) • Sign Out </div>	
Time : 06/26/2009 04:03:08 PM EDT	
<ul style="list-style-type: none"> Individual Block Requests CO/NXX Code Requests Withdraw Pending Requests Confirm Resources In Service Donate Blocks Submit Forecast Search Forms Reports User Profile 	<div style="text-align: right;">Printable Version</div> <p>November 21, 2003 Attachment 3 ATIS-0300066.at3</p> <p style="text-align: center;">Pooling Administrator's Response/Confirmation TBPA G Part 3</p> <p>Tracking Number : <u>904-JACKSONVL-FL-302146</u></p> <p>Date of Application: <u>06/26/2009</u> Effective Date: _____ Date of Receipt: <u>06/26/2009</u> Date of Response: <u>06/26/2009</u></p> <p>Service Provider Name: <u>BELLSOUTH SO BELL</u> (Telcordia™ LERG™ Routing Guide) OCN: <u>9417</u></p> <p>NPAC SOA SPID : _____</p> <p>Pooling Administrator Contact Information:</p> <p>Dara Sodano Phone: <u>925-363-8730</u> Signature of Pooling Administrator</p> <p>Dara Sodano Fax: <u>925-363-7697</u> Name (print)</p> <p>Email: <u>dara.sodano@neustar.biz</u></p> <p>NPA-NXX or NPA-NXX-X : _____ Block Assigned: _____ Block Reserved : _____ Block Reservation Expiration Date : _____ Block/Code Modified : _____ Block/Code Disconnected : _____</p> <p>Block Contaminated(Yes or No) : _____ If Yes,enter the number of TNs contaminated : _____</p> <p>Switch Identification(Switch Entity/POI): ¹ <u>MDVRFLLDS0</u> Rate Center: <u>JACKSONVL</u> Rate Center Sub Zone: _____</p>

3

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 the administrator.**

— Explanation:

Remarks:

—
—
—
¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

Back

Question? Email us
© 1997-2012 NeuStar, Inc.
Legal Notice

4

Pooling Administration System	
[Home] [Redacted]@ATT.COM (SP) • Sign Out	
Time : 06/26/2009 03:59:04 PM EDT	
<ul style="list-style-type: none">[-] Individual Block Requests[-] CO/NXX Code Requests[-] Withdraw Pending Requests[-] Confirm Resources In Service[-] Donate Blocks[-] Submit Forecast[-] Search Forms[-] Reports[-] User Profile	<h3 style="text-align: center;">Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</h3> <p style="text-align: center;">Your Utilization calculates to 69.566%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</p> <p style="text-align: center;">Select One Option and Submit</p> <ul style="list-style-type: none"><input checked="" type="radio"/> Return to the Months To Exhaust Form<input type="radio"/> Need to request a State Waiver<input type="radio"/> Received a State Waiver <div style="text-align: center; margin-top: 20px;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></div>
<small>Question? Email us © 1997-2012 NeuStar, Inc. Legal Notice</small>	

5

Jacksonville
Utilization Summary
Report

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Jacksonville	Arlington	JCVLFLARDS0	102				
Jacksonville	Atlantic	JCBHFLABRS0	20				
Jacksonville	Avenues	MNDRFLAVDS0	50				
Jacksonville	Beachwood	JCVLFLBWDS0	146				
Jacksonville	Clay Street	JCVLFLCLDS0	293				
Jacksonville	Ft. Caroline	JCVLFLFCDS0	34				
Jacksonville	Ft. George	FTGRFLMARS0	5				
Jacksonville	Int. Airport	JCVLFLIARS0	11				
Jacksonville	Lake Forest	JCVLFLLFDS0	52				
Jacksonville	Loretto	MNDRFLLODS0	79				
Jacksonville	Normandy	JCVLFLNODS0	64				
Jacksonville	Oceanway	JCVLFLOWDS0	38				
Jacksonville	Riverside	JCVLFLRV38E	61				
Jacksonville	San Jose	JCVLFLSJ73E	131				
Jacksonville	San Marco	JCVLFLSMDS0	135				
Jacksonville	San Pablo	JCBHFLSPRS0	48				
Jacksonville	Southpoint	JCVLFLJTRSA	69				
Jacksonville	Wesconnett	JCVLFLWCDS0	101				

Customer Contact Information

