DOCKET NO. 20210118-TA



TRACY W. HATCH Assistant Vice President – Senior Legal Counsel AT&T Florida AT&T Services, Inc. Legal Department 150 South Monroe St. Suite 400 T: 850-577-5505 F: 850-222-4401 Email: tracy.hatch@att.com

Tallahassee, FL 32301 FILED 6/23/2021 DOCUMENT NO. 06757-2021 FPSC - COMMISSION CLERK

T

June 23, 2021

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

Re: Docket No.:

REDACTEI

20210118

Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Coral Springs Rate Center

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 ____ GCD ___ IDM __G CLK ____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Expedited Review of Growth)) Code Denial by the Number Pooling Administrator) For the Coral Springs rate center. Docket No. Filed: June 22, 2021

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Telecommunications of 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 Coral Springs 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.
- 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 Coral Springs rate center is served by only 1 switch (ORLDFLMAGT1). TCAL owns 3 blocks: 754-240-6, 754-812-4 and 954-888-5 with 147, 810 and 17 available

numbers respectively. There are 53 aging numbers amongst the 3 blocks and 3 administrative numbers.

5. On June 16, 2021 TCAL requested 2400 consecutive numbers.

- 6. At the time of the request, the Coral Springs month-to-exhaust is 1.91 months and utilization is 65.67%
- On June 16, 2021, Somos 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 <u>Attachment 1</u>. Pursuant to Commission Order No. PSC-01-1973-PCO-TL the customer contact information is attached. See <u>Attachment 2</u>.
- 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. <u>See</u> 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'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.

WHEREFORE, TCAL requests:

1. The Commission review the decision of Somos to deny TCAL's request for additional numbering resources for the Coral Springs rate center; and

2

2. The Commission direct Somos to provide the requested numbering resources for the Coral Springs rate center as discussed above.

Respectfully submitted this 22th day of June, 2021.

· ·

Teleport Communications America LLC

TRACY HATCH⁷ 150 South Monroe St. Suite 400 Tallahassee, FL 32301 850-577-5505 Email: <u>th9467@att.com</u>

ATTACHMENT 1

Central Office Code (NPA-NXX) Application - Part I Revised: October 31, 2019

Tracking Number:	754-CORAL SPG-FL-1454145 Full NXX: Pool Replenishment					
Type of Application: New Change ¹ Delete						
1.0 GENERAL INFORMATION						
1.1 Contact Inform:	ation:					
<u>Code Applicant:</u> Company/Entity Name:						
Headquarters Address:						
City, State, Zip:						
Contact Name:						
Contact Address:						
City:		State:	ZIP:			
Phone:	and the second the	Fax :				
E-mail:						
Code Administrator. ²						
Name:	Patricia Soderland					
Address:	2411 Dulles Corner Park Suite 250					
City:	Herndon	State: VA	ZIP: 20171			
Phone:	571-363-3828	Fax : <u>571-363-</u> 3838				
		Sontoneronor				
1.2 NPA: 754	NXX: ³ LATA: <u>460</u> OCN: ⁴ Company's OCN(s)	Parent				
Switching Identification (Switching Entity/POI) ⁵ ORLDFLMAGT1						

Locality/City/Wire Center:

÷.

•

Rate Center:⁶CORAL SPG

Homing Tandem Operating Co.7:BELLSOUTH

Tandem Homing CLLI^{TM8}:MIAMFLGR05T

1.3 Dates

Date of Application:06/16/2021

Requested Effective Date:^{9,10} ____07/23/2021_

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 X No

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation: We are serving as our own AOCN, and will waive the entire 7 calendar day interval to update BIRRDS. We are requesting a code expedite on this request. We are the Homing Tandem Operating Company for MIAMFLGR05T, we agree to input the code into BIRRDS upon receipt of the Part 3.

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

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

c) Code Assignment Preference (Optional)

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

🗇 OCN-Intra-company¹¹ 🗇 Switching Id 🗇 Rate Center 🗇 Tandem Homing CLLI

 \square OCN-Inter-company¹² \square Effective Date \square LATA \square 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: ¹³ 🔄 Yes 🗍 No

1.6 NPA Jeopardy Criteria Apply: 👘 Yes 🗍 No

1.7 Code request for new service (Explain): Pool replenishment

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 BIRRDS has been completed.

Commentis:

I hereby certify that the above information requesting a CO Code 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) posted to the ATIS web site (http://www.atis.org/inc/incguides.asp) as of the date of this application.¹⁴

Rowena Brown

Signature of Code Applicant

Senior Network Specialist Title

06/16/2021 Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from the North American Numbering Plan Administrator (NANPA).

³The NXX field is required for any Central Office (CO) Code (NPA-NXX) request in which there is a change or the CO Code is being returned.

⁴Operating 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 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 Telecom Routing Administration (TRA) on 732-699-6700.

⁵This 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 eleven-character iconectiv[®] Common Language Location Identification (CLLITM) Code of the applicant's Switching Entity/POI. (iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.)

⁶Rate Center name shall be a tariffed Rate Center associated with toll billing.

⁷Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

⁹Central Office (CO) 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 CO Code. Such arrangements are outside the scope of these guidelines.

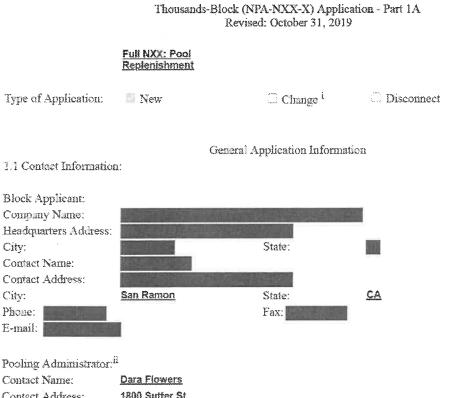
¹⁰Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

¹¹Select if you are the current Central Office (CO) Code Holder.

¹²Select if you are <u>not</u> the current Central Office (CO) Code Holder.

¹³The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling and shall leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.



ZIP:

ZIP:

754-CORAL SPG-FL-1454145

Phone: E-mail: Pooling Administrator:ⁱⁱ

Contact Name: 1800 Sutter St Contact Address: <u>CA</u> ZIP: 94520 City: Concord State: Phone: 925-420-0367 Fax: 925-420-0377 E-mail: dflowers@nanpa.com

1.2 General Information:

Tracking Number:

Check one : No LRN needed X LRN neededⁱⁱⁱ;

NPA: 754 LATA: 460 OCN^{iv}:_____ Parent Company's OCN Number of Thousands-Blocks Requested : 3 Switch Identification (Switching Entity/POI^V): ____ORLDFLMAGT1____ Rate Center^{vi}: CORAL SPG_ 1.3 Dates: Date of Application^{vii}: 06/16/2021 Requested Effective Datevili:

Requested Expedited Treatment? (See Section 8.6) Yes X_No_

Expedited Explanation: We are serving as our own AOCN, and will waive the entire 7 calendar day interval to update BIRRDS. We are requesting a code expedite on this request. We are the Homing Tandem Operating Company for MIAMFLGR05T, we agree to input the code into BIRRDS upon receipt of the Part 3.

07/23/2021

🗇 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 :

_(LEC, IXC, CMRS, Other) a) Type of Service Provider :____

b) Primary Type of Service Blocks to be used for :____

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) _____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 _____ 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 Containinated: 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

<u>06/16/2021</u> 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[®]) LERGTM 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 NECAassigned 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:

¹Identify the type of change(s) in Section 1.5.

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

ⁱⁱⁱA 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 CLLITM 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 <u>not</u> the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2 **Revised: October 31, 2019** (Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 754-CORAL SPG-FL-1454145 Date: Wednesday, June 16, 2021 OCN:8300 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Rate Center: CORAL SPG

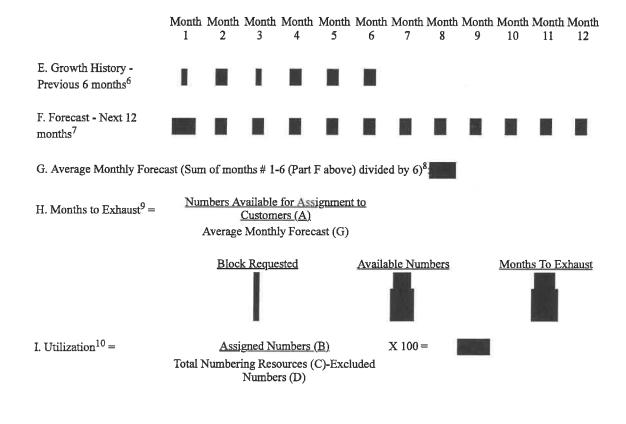
۰.

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:<u>754-240-6, 754-812-4, 954-688-5</u>,

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 10.0	00) and excluded	1 fron

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵

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



Explanation: _____

.

¹A 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.

²List 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.

³The 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).

⁴The 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).

⁵Quantity 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).

⁶Net 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.

⁷Forecast of Telephone Numbers (TN) 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 (NPA-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 (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)).

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

+

.

Tracking Number :	754-CORAL SPG-FL- 1454145		
Date of Application:	06/16/2021	Effective Date:	
Date of Receipt:	06/16/2021	Date of Response:	06/16/2021
Service Provider Name:			
(LERG TM Routing Guide ¹) OCN	J:		
Parent Company OCN:			- 11
NPAC SOA SPID :			
Pooling Administrator Contact In	formation:		
Dara Flowers		Phone:	925-420-0367
Signature of Pooling Administrat	or		
Dara Flowers		Fax:	925-420-0377
Name (print)			
Email:		dflowers@nanpa.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 contaminated (1-1000):	f TNs		

	Switch Identification (Switching/POI) ² :	ORLDFLMAGT1
	Rate Center:	CORAL SPG
х	Form complete, request denied.	
	Explanation:	
	You may proceed with requesting a State V denial. If you are in disagreement with the	ilization requirements, therefore this request for a new code is denied. Naiver from the appropriate state commission using this Part 3A disposition of this request, please refer to the Thousands-Block (NPA- administration Guidelines for the appeals process.
	Request Withdrawn.	
	Explanation:	
	Assignment Activity Suspended by Admir	nistrator.
	Explanation:	32
Rema	rks:	
1.		@

ł

¹ iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM 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.