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July 7, 2025

Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard, Suite 152
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2025 JUL -9 PM 3:07
COMMISSION CLERK

Re: Petition for Expedited Review

Dear Mr. Teitzman:

Enclosed for filing is the Petition for Expedited Review of the denial of an application for numbering resources for the Punta Gorda rate center by MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon).

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Verizon hereby makes a claim of confidentiality for information contained in Exhibit 1 to the Petition. Exhibit 1 concerns a customer request for the assignment of telephone numbers that Verizon regards as confidential. One copy of the confidential information is enclosed in a sealed envelope.

If there are any questions regarding this filing, please contact me at 404-291-6252.

Sincerely,

Dulaney L. O’Roark III

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon for Expedited) Docket No.
Expedited Review of the Denial of Its) Filed: July 7, 2025
Application for Numbering Resources)
_____)

**PETITION OF VERIZON FOR EXPEDITED REVIEW OF THE DENIAL
OF ITS APPLICATION FOR NUMBERING RESOURCES**

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon) requests that the Commission review the denial by the Number Pooling Administrator (“PA”) of Verizon’s application for a one thousand block (Thousand Block) of telephone numbers in the Punta Gorda, Florida rate center; overturn that decision; and order that a Thousand Block be assigned to Verizon. In support of this Petition Verizon states:

PARTIES

1. Verizon is a competitive local exchange telecommunications company that provides local exchange service and exchange access service in Florida.

2. The PA 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 under Section 364.16(7), Florida Statutes.

BACKGROUND AND REQUEST FOR RELIEF

4. A business customer has requested Verizon to provide 1,000 consecutive direct inward dial (DID) telephone numbers in the 941 NPA in the Punta Gorda, Florida rate center. The new telephone numbers were requested for additional locations and the expansion of a communications system within a hospital system. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Verizon does not have 1,000 consecutive DID telephone numbers that meet the customer's needs, it applied on June 6, 2025 to the PA for a Thousand Block in the Punta Gorda rate center.¹ Verizon's application is included in Exhibit 2.

6. The PA denied Verizon's request on June 6, 2025. The request was denied because Verizon did not meet the FCC's months-to-exhaust and utilization criteria, even though Verizon does not have the numbering resources needed to satisfy its customer's request. The months-to-exhaust and utilization worksheet is included in Exhibit 2 as is the PA's denial of Verizon's application.

7. The FCC has delegated authority to the Commission to address the PA's denial of a request for numbering resources, stating that "[w]e agree ... that

¹ Although the request to the PA was made in the name of MCI WorldCom Communications, Inc, - FL (OCN 7448), the service is being provided by Verizon.

a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources.”² Moreover, the FCC has determined that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request.” Specifically, states “may grant requests for customers seeking contiguous blocks of numbers.”³

8. Based on this authority, the Commission has issued a number of orders addressing denials by the PA that release numbering resources to meet specific customer needs. For example, the Commission ordered the PA to provide CenturyLink with numbering resources to meet the service requirements of a customer that requested 5,000 consecutive numbers, even though CenturyLink had been unable to satisfy the months-to-exhaust or utilization criteria.⁴

9. The PA’s denial of sufficient numbering resources to Verizon to meet its customer’s request is inconsistent with the FCC’s position that “[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”⁵ By refusing to grant numbering resources

² *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 95-116, ¶ 61(2001).

³ *Id.* ¶ 64.

⁴ *Petition for Expedited Review of NXX-X Code Denial*, Docket No. 120041-TL, Order No. PSC-12-0089-PAA-TL (March 1, 2012).

⁵ *Numbering Resource Optimization*, Second Report and Order and Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed

sufficient to meet the needs of Verizon's customer, the PA is preventing this customer from obtaining the service it wants from the carrier of its choice.

10. Verizon's request for a Thousand Block to meet its customer's request fits squarely within the framework established by the FCC for "safety valve" requests that the Commission is authorized to grant. Verizon respectfully requests that the Commission direct the PA to assign a Thousand Block for the Punta Gorda, Florida rate center so that Verizon can satisfy its customer's request.

WHEREFORE, Verizon respectfully requests that the Commission review the PA's decision to deny Verizon's request for additional numbering resources, overturn that decision, and direct the PA to assign Verizon a Thousand Block in the Punta Gorda, Florida rate center.

Respectfully submitted on July 7, 2025.

By:


Dulaney L. O'Roark III
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Alpharetta, GA 30004
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de.oroark@verizon.com

Attorney for MCImetro Access Transmission
Services Corp. d/b/a Verizon Access
Transmission Services LLC

Exhibit 2

Tracking Number: 941-PUNTAGORDA-FL-3108874

Thousands-Block (NPA-NXX-X) and Central Office Code (NPA-NXX) Application - Part 1

Revised: October 28, 2024

Type of Application: New Modification¹ Disconnect

1.0 Applicant Contact Information

Service Provider OCN Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

Headquarters Address: One Verizon Way

City: Basking Ridge State: NJ ZIP: 07920

Contact Name: Kate Rafalski

Contact Address: 14 Chestnut Street

City: Worcester State: MA ZIP: 01608

Phone: 978-322-2153 E-Mail: katherine.rafalski@verizon.com

1.1 North American Numbering Plan Administrator²

Contact Phone: 866-623-2282 E-Mail: support@nanpa.com

1.2 General Information

NPA: 941 NXX³: X⁴:

LATA: 939 Service Provider OCN⁵: 7448

OCN Category⁶: CLEC Parent Company OCN: 7229

Number of Thousands-Blocks Requested: 1

Switching Identification (Switching Entity/POI) CO Code⁷:

Switching Identification (Switching Entity/POI) Thousands-Block⁸: FTMYFLXAXEY

Rate Center⁹: PUNTAGORDA

Homing Tandem Operating Company¹⁰:

Tandem Homing CLLI^{TM11}:

1.3 Dates

Date of Application: 06/06/2025

Requested Effective Date CO Code^{12,13}:

By selecting this checkbox, I acknowledge that I am requesting an effective date 52 calendar days from the date the Administrator processes the request.

Request Expedited Treatment CO Code: Yes No

Expedite documentation must be provided when is "Request Expedite" = Yes and your company is not its own AOCN.¹⁴

Expedite Explanation:

Requested Effective Date Thousands-Block¹⁵: 07/07/2025

By selecting this checkbox, I acknowledge that I am requesting an effective date 24 days from the date the Administrator processes the request.

Request Expedited Treatment Thousands-Block: Yes No

1.4 Thousands-Block/CO Code Information

CO Code Assignment Preference:

CO Codes that are Undesirable, if any:

Code Applicant Responsibility

It is the Code Applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum activation interval for BIRRDS will not begin until input into BIRRDS has been completed.

Thousands-Block(s) Assignment Preference: 941-559-3

Thousands-Block(s) that are Undesirable, if any:

By selecting this checkbox, I acknowledge that I am willing to accept a Thousands-Block where the underlying CO Code may not yet be activated in the PSTN and loaded in the NPAC on the Thousands-Block effective date.¹⁶

1.5 Type of Request (Initial or Growth)

Initial Thousands-Block and/or CO code for the rate center: Yes

If yes, attach evidence of authorization and proof of capability to provide Service within 60 days.

Growth Thousands-Block and/or CO Code for the rate center: Yes

If yes, attach months to exhaust worksheet.

Pool Indicator¹⁷: Yes No

Update BIRRDS/LEGR¹⁸: Yes No

1.6 Modification

- OCN: Intra-Company¹⁹ Switching Id Tandem Homing CLLI
 - OCN: Inter-Company²⁰ Part 1B Effective Date
 - Rate Center Add New ISP Thousands-Block Port
-

1.7 Disconnect

Is this Thousands-Block Contaminated: Yes No

If yes, are there over 100 ported TNs: Yes No

If yes, are you exiting the market: Yes No

I acknowledge I have completed all Intra SP ports in the NPAC and protected the Thousands-Block from further assignment.

Comments:

1.8 Certification Statement

I hereby certify that the information on this application 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>) as of the date of this application.²¹

Signature of Applicant: Kate Rafalski

Date: 06/06/2025

Instructions for filling out each Section of the Part 1 form:

Section 1.0: Contact information requires that Service Providers (SP) supply under "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 phone and e-mail address.

Section 1.2: The SP shall supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the iconectiv®, LLC LERG™ Routing Guide²². 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). The Switch Identification (Switching Entity/POI) and for Central Office (CO) Code requests the **Tandem Homing CLLI™²³** shall also be entered. Explanations of these terms may be found in the footnotes. In addition, when requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center the number of Thousands-Blocks requested shall be supplied.

Section 1.3: The date the Service Provider (SP) completes the application shall be entered in this section. For Central Office (CO) Code requests the Effective Date of the requested CO Code shall be entered. For Thousands-Block requests and CO Code requests for LRN or Pool Replenishment a Pooling Rate Center the Effective Date of the requested Thousands-Block shall be entered.

Section 1.4: For Central Office (CO) Code request, the Service Provider (SP) may indicate their preference for a particular CO Code, e.g., 321-6XX, or indicate any CO Code that may be undesirable, e.g., 321-6XX. When requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center, SPs may indicate their preference for a particular Thousands-Block, e.g., NPA- 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., NPA-321-6XXX.

Section 1.5: Service Providers (SP) indicate the type of request. Initial requests are for first applications for a Thousands-Block and/or Central Office (CO) Code in a Rate Center, Growth applications are for additional Thousands-Blocks and/or CO Codes 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) indicate when the request is for a modification and the type of change. Rate Center and Tandem Homing CLLI changes only apply to Central Office (CO) Codes. Part 1B changes only apply to Thousands-Blocks.

Section 1.7: Service Providers (SP) indicate when the request is for a disconnect. When the request is to disconnect a Thousands-Block, SPs shall also 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 North American Numbering Plan Administrator (NANPA) shall seek a new Thousands-Block Holder.

-
- ¹ Identify type and reason for change(s) in Section 1.6.
 - ² The contact information for the North American Numbering Plan Administrator (NANPA) may be located at <https://www.nanpa.com>.
 - ³ The NXX field is required for any Thousands-Block or Central Office (CO) Code modification or disconnect.
 - ⁴ The X field is required for any Thousands-Block modification or disconnect.
 - ⁵ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments and Thousands-Block (NPA-NXX-X) 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.
 - ⁶ Each OCN is categorized to identify the type of company associated with a Company Code / OCN. Such information for a particular OCN is available in the LERG™ Routing Guide (LERG 1 table).
 - ⁷ This 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 (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.)
 - ⁸ This 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 (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.)
 - ⁹ Rate Center name shall be a tariffed Rate Center associated with toll billing and in the LERG™ Routing Guide.
 - ¹⁰ Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).
 - ¹¹ This 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.

12 Central Office (CO) Code Applicants should request an effective date that is at least 59 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.

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

14 When your company is its own AOCN please provide the following in the remarks field: I act as my own AOCN and agree to reduce the input timeframe to [enter days]. When your company is not its own AOCN please provide the AOCN's acknowledgement and agree to reduce the input timeframe to [enter days] and expedite letter from your homing tandem operating company when requesting a new CO Code.

15 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).

16 In NAS, Thousands-Blocks from CO Codes not activated in the PSTN are identified as Available Pending (AP) on reports.

17 The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling or indicate "No" if the CO Code being requested shall be used for a non-pooled CO Code or a dedicated customer where the Thousands-Block will not be built in BIRRDS.

18 The Applicant shall indicate "Yes" if the Dedicated Customer Central Office (CO) Code being requested, or the Thousands-Block being ISP Thousands-Block Ported, shall be identified as Thousands-Block Number Pooled in BIRRDS/LEGGTM and have all 10 Thousands-Block records built. The Applicant shall indicate "No" if the CO Code being requested shall be used as a non-pooled CO Code for a Dedicated Customer or the Thousands-Blocks being ISP Thousands-Block Ported shall not be identified as Thousands-Block Number Pooled in BIRRDS/LEGGTM and have all 10 Thousands-Blocks built.

19 Select if you are the current Thousands-Block or Central Office (CO) Code Holder

20 Select if you are not the current Thousands-Block or CO Code Holder

21 The Thousands-Block/Central Office (CO) Code applicant certifies veracity of this form by signing their name, and providing their title and date.

22 iconectiv[®], LLC and Common Language[®] are registered trademarks and CLCITM, CLLITM, LEGERTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of iconectiv[®], LLC.

23 This 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.

Tracking Number: 941-PUNTAGORDA-FL-3108874

Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 1

Revised: October 28, 2024

(worksheet to be used for Requests for Additional Thousands-Blocks and CO Codes for Growth)

Date: 06/06/2025

Service Provider OCN: 7448

Service Provider OCN Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

Rate Center: PUNTAGORDA

List all CO Codes NPA(s)-NXXs and Thousands-Blocks NPA(s)-NXX-X(s)²: 941-347-5, 941-676-3

Name of Applicant: Kate Rafalski

Phone: 978-322-2153-null

E-Mail: katherine.rafalski@verizon.com

A. Available Numbers³: 1123

B. Assigned Numbers: 739

C. Total Numbering Resources⁴: 2000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: 0

List excluded CO Code(s) or Thousands-Block(s):

E. Previous 6-month growth history⁶:

Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
1	0	0	0	10	-1						

F. Forecast - Next 12 months⁷:

Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
1007	4	4	4	4	4	4	4	4	4	4	4

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6)⁸: 171.167

H. Months to Exhaust⁹:

$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{6.561}$$

Block Requested	Available Numbers	Months to Exhaust
1	1123	6.561

I. Utilization¹⁰:

$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) - Excluded Numbers (D)}} \times 100 = \underline{36.950}$$

Explanation:

¹ A copy of this worksheet is required to be submitted to the North American Numbering Plan Administrator (NANPA) 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 Service Provider 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 Report in NAS and shall automatically populate on this form in NAS. 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 Service Provider 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 NAS and shall automatically populate on this form in NAS. 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 Thousands-Blocks received = 2,000 and 1 CO 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 NAS.

⁹ This field is automatically calculated and populated on this form in NAS. To be assigned an additional Thousands- Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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 NAS. To be assigned an additional Thousands- Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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)).

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Tracking Number: 941-PUNTAGORDA-FL-3108874

Administrator's Response/Confirmation - Part 3

Revised: October 28, 2024

Date of Application: 06/06/2025

Effective Date:

Date of Response: 06/06/2025

Request Approved

Request Suspended

Request Withdrawn

Request Denied

Administrator Comments:

The Months to Exhaust (MTE) and/or Utilization requirements were not met. This Part 3 denial may be used to request a state waiver from the appropriate state commission.

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.

NPA, NPA-NXX, NPA-NXX-X: 941

Rate Center: PUNTAGORDA

State: FL

Assigned

Modified

Disconnected

Thousands-Block Contaminated: Yes No

If yes, the number of TNs contaminated (1-1000):

Reserved

Reservation Expiration Date:

Service Provider OCN Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

Service Provider OCN: 7448

OCN Category: CLEC

Parent Company OCN: 7229

NPAC SPID:

Switching Identification (Switching Entity/POI): FTMYFLXAXEY

Tandem Homing CLLI™:

Applicant Contact Name: Kate Rafalski

Phone: 978-322-2153

Email: katherine.rafalski@verizon.com

Administrator Contact Name: Patricia Soderland

Phone: 571-363-3828

Email: psoderland@nanpa.com



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