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September 9, 2005

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
& Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 050600-TL

Dear Ms. Bayó:

Enclosed are the original and fifteen copies of Sprint's Petition for expedited Review of NXX-X Code Denial and the original and fifteen copies of Sprint's Request for Confidential Classification, which we ask that you file in the captioned new docket.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850-599-1560.

Sincerely,

Susan S. Masterton

Enclosure

DOCUMENT NUMBER-DATE

08616 SEP-9 13

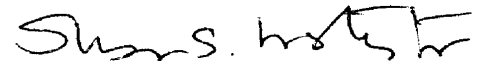
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**DOCKET NO. \_\_\_\_\_**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S.  
Mail this 9<sup>th</sup> day of September, 2005 to the following:

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

NANPA  
Tom Foley, Relief Planner  
Eastern Region  
820 Riverbend Blvd.  
Longwood, FL 32779-2327

  
\_\_\_\_\_  
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth )  
Code Denials by the North American Numbering )  
Administration for the Belleview Exchange )  
\_\_\_\_\_ )

Docket No. 050600 -7L

Filed: September 9, 2005

**PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL**

Sprint-Florida, Incorporated ("Sprint"), 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-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator's ("NewStar") denial of Sprint's requests for additional numbering resources in the Belleview Exchange. In support of this petition, Sprint states:

**PARTIES**

1. Sprint is 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 the Industry Numbering Committee's (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This 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. On March 31, 2000, the FCC issued Order No. 00-104 (“FCC 00-104” or the “Order”) in the Numbering Resource Optimization docket (Docket No. 99-200). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of telephone numbers and to avoid further exhaustion of telephone numbers under the NANP.
5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. FCC Order at § 105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing numbering inventory within the applicant’s rate center will be exhausted within six months of the application. Prior to the ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant’s existing number inventory within the applicant’s serving switch to exhaust within a specific months-to-exhaust (“MTE”) of the code application in order for a code to be assigned or for the carrier to prove that it was unable to meet a specific customer’s request with its current inventory of numbers. The FCC stated that the shift to a “rate center” basis for determining the need for new numbering resources was intended to “more accurately reflect how numbering

resources are assigned” and to allow “carriers to obtain numbering resources in response to specific customer demands.” FCC Order at ¶ 105.

6. On December 29, 2000, the FCC also released FCC 00-429, which reaffirmed FCC 00-104 and required carriers to also meet a 60 percent initial utilization threshold. FCC 00-429 at ¶ 26. Based on these two FCC orders, carriers are required to meet six MTE criteria as well as a utilization threshold on a rate center/exchange basis in order to be granted additional numbering resources. Id. At ¶ 29.
7. In FCC 00-104, the FCC directed the industry and the Pooling Administrator to comply with the INC Pooling Guidelines. FCC 11-104 ¶ 183. Pursuant to the INC Guidelines, in order to obtain thousand-block allocations, the carrier must demonstrate that its existing numbering resources for the rate center will exhaust within six (6) months and also have a utilization of 75 percent for the specific rate center. See INC Guidelines Section 4.3 (c) [THOUSANDS-BLOCK NUMBER (NXX-X) POOLING ADMINISTRATION GUIDELINES (TBPAG) dated May 20, 2005] and Appendix 3. These requirements are known as the six (6) months-to-exhaust (“MTE”) and utilization threshold.
8. Sprint has utilized mechanisms such as number pooling to manage its numbering resources in the most efficient manner. However, Sprint is required in this instance to petition the Commission for relief.
9. On May 25, 2001, BellSouth petitioned the Commission to develop an expedited process to review NANPA’s denial of a request for additional

numbering resources to minimize the delay carrier's experience in attempting to challenge a denial by NANPA. As a result of BellSouth's Petition and the Commission's efforts to make numbering resources available to carriers, the commission issued Order No. PSC-01-1973-PCO-TL setting forth an expedited code denial process. On March 15, 2002, the Commission issued Order No. PSC-02-0352-PAA-TL adopting the same expedited code denial process for pooling areas.

10. The Belleview Exchange consists of one (1) central office and one (1) switching entity that utilizes numbering resources.
11. On September 2, 2005 Sprint requested additional numbering resources from NeuStar for the Belleview exchange. See Attachment 1. Specifically, in order to meet the telephone number needs of one of its customers, Sprint requested 20 consecutive numbers in the Belleview (BLVWFLXADS0) wire center. The customer has requested 20 consecutive numbers. Sprint cannot currently meet this request given the inventory of numbers available at this time in this switch.
12. At the time of the code request, the Belleview exchange had a MTE of 18.7 and a utilization of 92.6%. There are no blocks of un-assigned numbers large enough to meet the request of this customer in this switch.
13. On September 2<sup>nd</sup>, NeuStar denied Sprint's request for additional numbering resources because Sprint had not met the MTE criteria, notwithstanding the fact that Sprint's Belleview switch does not have an available block of 20 consecutive numbers to meet

customer's requirements and the fact that the Belleview switch utilization is at 92.6%. See Attachment 1.

14. Sprint's request for additional numbering resources to meet this customer's requirement in the Belleview Exchange would not materially impact exhaustion of available numbers in the 352 area code.
15. As discussed above, both the FCC Order and INC guidelines provided 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 11.1(c).
16. Under earlier 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 and NANPA look at the MTE criteria and utilization threshold for the rate center and allow exceptions. The current process is arbitrary and may result 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.
17. Sprint's inability to provide this customer with the requested numbers prevents Sprint from providing the quality of service this customer desires and expects.
18. This Commission has previously received similar requests from numerous carriers, both ILECs and CLECS in which the carriers have asked the PSC to

overrule a decision of NANPA and NeuStar. The Commission has granted these requests.

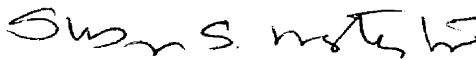
19. Sprint requests that the Commission reverse NeuStar's decision to withhold numbering resources from Sprint on the following grounds:

- (a.) NeuStar's denial of numbering resources to Sprint interferes with Sprint's ability to service its customers within the State of Florida.
- (b.) As a result of NeuStar's denial of Sprint's request for additional numbering resources, Sprint will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, Sprint requests:


- 1. The Commission review the decision of NeuStar to deny Sprint's request for additional numbering resources for the Belleview exchange, and
- 2. The Commission direct NeuStar to provide the requested numbering resources for the Belleview exchange as discussed above.

Respectfully submitted this 9<sup>th</sup> day of September, 2005



Susan S. Masterton  
Attorney for Sprint  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
850-599-1560








**Pooling Administration System** jeannie.johnson@mail.sprint.com (SP)

Sign Out

**Request Resources**

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State	FLORIDA	
NPA	352	
Rate Center	BELLEVIEW	
OCN	0341-SPRINT UNITED TEL FL	
Type of Application	Application for Individual Blocks 	
Quantity of Blocks Requested	1	

---

 **NOTE:**

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

<b>Pooling Administration System</b>	
jeannie.johnson@mail.sprint.com (SP)	Sign Out
<b>Part 1A</b>	
<b>Type of Application : New</b>	
<b>1.1 Contact Information :</b>	
<i>Note: If any of the contact info is incorrect, edit your user profile.</i>	
<b>Block Applicant :</b>	
Company Name <b>SPRINT UNITED TEL FL</b>	
Headquarters Address: <b>555 Lake Border Drive</b>	
City: <b>Apopka</b>	
State: <b>FL</b>	
Zip: <b>32703</b>	
Contact Name <b>Ms Gloria J Johnson</b>	
Contact Address <b>555 Lake Border Drive</b>	
City <b>Apopka</b> State <b>FL</b>	
Zip <b>32703</b>	
Telephone <b>(407) 889-6159</b> Fax <b>(407) 884-1955</b>	
E-mail <b>jeannie.johnson@mail.sprint.com</b>	
<b>Pooling Administrator :</b>	
Contact Name <b>Mr Gary Zahn</b>	
Contact Address <b>1800 Sutter St. Ste. 780</b>	
City <b>Concord</b> State <b>CA</b>	
Zip <b>94520</b>	
Telephone <b>(925) 363-8753</b> Fax <b>(925) 363-7688</b>	
E-mail <b>gary.zahn@neustar.biz</b>	
<b>1.2 General Information</b>	
LRN Needed <b>No</b>	
NPA <b>352</b> LATA * <b>454</b>	
OCN <b>0341-SPRINT UNITED TEL FL</b>	
Parent Company OCN * <b>2000</b>	
Number of Thousands-Blocks Requested <b>1</b>	
Switch Identification (Switching Identity/POI) * <b>BLVWFLXADS0</b>	
City or Wire Center Name <b>BELLEVUE</b>	
Rate Center <b>BELLEVUE</b> Rate Center Sub Zone <b>03</b>	
<b>1.3 Dates</b>	

Date of Application <b>Friday, September 2, 2005</b>			
Requested Block Effective Date <b>3 Oct 2005</b>			
Request Expedited Treatment <input type="radio"/> Yes <input checked="" type="radio"/> No			
<b>1.4 Type of Service Provider Requesting the Thousands-Block</b>			
a) Type of Service Provider * <b>Incumbent Local Exchange Carrier (ILEC)</b>			
b) Primary type of service Blocks to be used for * <b>Wireline</b>			
c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.	<input type="text"/>	<input type="checkbox"/>	<div>352-653-0</div> <div>Delete</div>
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any	<input type="text"/>	<input type="checkbox"/>	<div></div> <div>Delete</div>
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) <b>N/A</b>			
<b>1.5 Type of Request</b>			
Initial block for rate center <input type="radio"/> Yes			
Growth block for rate center <input checked="" type="radio"/> Yes			
Change block <b>N/A</b>			
Disconnect block <b>N/A</b>			
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 INC 99-0127-023			

Screen One - PAS

# Pooling Administration System

jeannie.johnson@mail.sprint.com (SP)

Sign Out

## Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Friday, September 2, 2005

OCN 0341

Company Name SPRINT UNITED TEL FL

Rate Center BELLEVIEW

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

352 - 245; 307; 347

Name of Block Applicant Ms Gloria J Johnson

Title Switch Design Analyst

Telephone Number (407) 889-6159

Fax Number (407) 884-1955

E-Mail jeannie.johnson@mail.sprint.com

A. Available Numbers \* B. Assigned Numbers \* C. Total Numbering Resources \* D. Quantity of numbers activated in the past 90  
days and excluded from the Utilization calculation 

List excluded Code(s) or Block(s)

### E. Growth History - Previous 6 months<sup>2</sup> \*

Month 1	<input type="text"/>	Month 2	<input type="text"/>
Month 3	<input type="text"/>	Month 4	<input type="text"/>
Month 5	<input type="text"/>	Month 6	<input type="text"/>

F. Forecast - Next 12 months<sup>3</sup> \*

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

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

H. Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

## Explanation

needs consecutive DID numbers and  
we cannot locate 20 consecutive numbers.

1. A 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.
2. Net 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.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To 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, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Show Calculations Continue Cancel

## Pooling Administration System

 jeannie.johnson@mail.sprint.com (SP)

[Sign Out](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

#### Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1  
(Thousands-Block Number Pooling Growth Block Request)

4 Date: 09/02/05 OCN: Company Name: SPRINT

5 Rate Center: Bellview, FL

6 Name of Block Applicant: SPRINT Signature:

7 List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): 352-245, 307, 347

8 Title: Telephone No.: FAX No.:

9 E-Mail:

10 A. Available Numbers:

11 B. Assigned Numbers:

12 C. Total Numbering Resources:

13 D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:

14 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
--	----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

17 E. Growth History – Previous 6 months<sup>2</sup>

19 F. Forecast – Next 12 months<sup>3</sup>

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

21 H. Months to Exhaust<sup>4</sup>  $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$  = 18.7

23 I. Utilization<sup>5</sup>  $\frac{\text{Assigned Numbers (B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources (C)} - \text{Excluded Numbers (D)}} \times 100$  = 92.6%

25 Explanation: needs consecutive DID numbers and we cannot locate 20 consecutive numbers. Please proceed with the waiver/appeal process:  
26 this request is denied. The contact name for:

27 1 A 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.

29 2 Net 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.

30 3 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

31 4 To 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, § 52.15 (g) (3) (iii)).

32 5 Newly-acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))



1     **Customer Contact Information:**  
2     [REDACTED]  
3     [REDACTED]  
4     [REDACTED]

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of	)	DOCKET NO.
Growth Code Denials by the North American	)	
Numbering Administration for the Belview	)	FILED: September 9, 2005
Exchanges.	)	
_____	)	

**Sprint-Florida, Incorporated's Request for Confidential Classification**  
**Pursuant to Section 364.183(1), Florida Statutes**

Sprint-Florida, Incorporated (hereinafter, "Sprint") hereby requests that the Florida Public Service Commission ("Commission") classify certain documents and/or records identified herein as confidential, exempt from public disclosure under Chapter 119, Florida Statutes and issue any appropriate protective order reflecting such a decision.

1. The information that is the subject of this request is proprietary customer information or information that is confidential and proprietary to Sprint, the release of which would impair the competitive business of Sprint. Sprint is filing this request pursuant to Rule 25-22-2006, F.A.C. The following documents or excerpts from documents are the subject of this request:

**Highlighted information in Attachment 1 to Sprint's Petition for Expedited Review of NXX-X Code Denial**

2. Two redacted copies of the information are attached to this request. One unredacted copy of the confidential information was filed under seal with the Division of Records and Reporting on under separate cover on this same date. Confidential information is highlighted in yellow.

3. The information for which the Request is submitted is customer information that Sprint is required by law to keep confidential or information the release of which would

impair Sprint's competitive business interests and is confidential and proprietary to Sprint. Specific justification for confidential treatment is set forth in Attachment A.

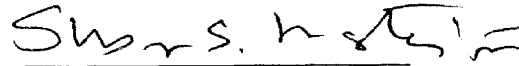
4. Section 364.183(3), F.S., provides:

- (3) The term "proprietary confidential business information" means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. The term includes, but is not limited to:
  - (a) Trade Secrets.
  - (b) Internal auditing controls and reports of internal auditors.
  - (c) Security measures, systems, or procedures.
  - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.
  - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
  - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

5. The subject information has not been publicly released by Sprint.

Based on the foregoing, Sprint respectfully requests that the Commission grant the Request for Confidential Classification, exempt the information from disclosure under Chapter 119, Florida Statutes and issue any appropriate protective order, protecting the information from disclosure while it is maintained at the Commission.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of September 2005.

A handwritten signature in black ink, appearing to read "Susan S. Masterton", with a horizontal line drawn underneath it.

Susan S. Masterton  
Post Office Box 2214  
Tallahassee, Florida 32316-2214  
850/599-1560

ATTORNEY FOR SPRINT

## ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Highlighted information contained in Attachment 1 to Sprint's Petition, P. 5, lines 17-19, 21, and 24-26. P. 6, lines 3-8, and 12. P. 8, lines 10-12, 17, 19, 20, 25, and 26. and P. 9, lines 2-4.	Contains information concerning Sprint's projected growth and telephone number resources which is proprietary to Sprint and which is information the release of which would impair Sprint's competitive business interests and is confidential and proprietary to Sprint. S.364.183(3)(e), F.S. Also may Contain proprietary customer information which Sprint is prohibited by law from releasing. s. 364.24, F.S.