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REDACTED

September 21, 2007

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

070613-TL

RECEIVED-FRSC
07 SEP 21 PM 4:15
COMMISSION CLERK
cm

Re: Petition for the Expedited Review of Growth Code Denials 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 NXX-X 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
E. Earl Edenfield, Jr.
James Meza III

- CMP
 - COM
 - CTR
 - ECR
 - GCL
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08679 SEP 21 5

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CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code Denials
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 21st day of September, 2007 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)
Code Denials by the Number Pooling Administrator)
for the Jacksonville exchange (Loretto))
_____)

Docket No. 0706/3-72

Filed: September 21, 2007

PETITION FOR EXPEDITED REVIEW OF NXX-X 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 request 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

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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 September 12, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Jacksonville Loretto (MNDRFLLODS0) switch. See Attachment 1. Specifically, AT&T Florida requested a block to meet the request of a specific customer for 300 consecutive telephone numbers. The code should be in the format of NPA NX2-8.

6. At the time of the code request, the Jacksonville exchange had a MTE of 29.15 and a utilization of 74.04%, while the Loretto (MNDRFLLODS0) switch had a MTE of 26.47.

7. On September 12, 2007, 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 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's 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 the CLECs have to meet the MTE requirement in only 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 21st day of September, 2007.

AT&T FLORIDA



James Meza III¹
Tracy W. Hatch
Manuel A. Gurdian
c/o Gregory R. Follensbee
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Suite 400
Tallahassee, Florida 32301
(305) 347-5518



E. Earl Edenfield, Jr.
AT&T Southeast
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763

691363

¹ The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

Pooling Administration System **REDACTED**

[Redacted]@bridge.bellsouth.com (SP)

Sign Out

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **BELLSOUTH SO BELL**

Headquarters Address [Redacted]
City: [Redacted]
State: [Redacted]
Zip: [Redacted]

Contact Name [Redacted]
Contact Address [Redacted]
City [Redacted]
Zip [Redacted]

State [Redacted]

Telephone [Redacted]

Fax [Redacted]

E-mail [Redacted]@bellsouth.com

Pooling Administrator ⁱⁱ:

Contact Name **Ms Dara Sodano**
Contact Address **1800 Sutter St. Ste. 780**
City **Concord**
Zip **94520**

State **CA**

Telephone **(925) 363-8730**

Fax **(925) 363-7697**

E-mail **dara.sodano@neustar.biz**

1.2 General Information

LRN Needed ⁱⁱⁱ No

NPA **904**

LATA * **452**

OCN ^{iv*} **9417-BELLSOUTH SO BELL**

Parent Company OCN * **9417**

Number of Thousands-Blocks Requested **1**

Switch Identification (Switching Identity/POI) ^{v*} **MNDRFLLODSO**

City or Wire Center Name

Rate Center ^{vi} JACKSONVILLE	Rate Center Sub Zone
1.3 Dates	
Date of Application ^{vii} Wednesday, September 12, 2007	
Requested Block Effective Date ^{viii} 13 Oct 2007	
Request Expedited Treatment <input type="radio"/> Yes <input checked="" type="radio"/> No	
1.4 Type of Service Provider Requesting the Thousands-Block	
a) Type of Service Provider <input type="text" value="Incumbent Local Exchange Carrier (LEC)"/>	
b) Primary type of service Blocks to be used for <input type="text" value="Wireline"/>	
c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool. NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.	
d) Thousands-Block(s) (NPA-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 <input type="radio"/> Yes	
Growth block for rate center <input checked="" type="radio"/> Yes	
Change block N/A	

REDACTED

Disconnect block *N/A*

Remarks BLOCK NEEDED FOR SPECIFIC CUSTOMER REQUES

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 (ATIS-0300066)

Continue

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

Section 1.1 Contact information requires that Service Providers 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 section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Pooling Administration System

[REDACTED]@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Wednesday, September 12, 2007**

OCN **9417**

Company Name **BELLSOUTH SO BELL**

Rate Center **JACKSONVILLE**

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

[Empty table for listing codes and blocks]

Name of Block Applicant [REDACTED]

Title [REDACTED]
Telephone Number [REDACTED]
Fax Number [REDACTED]
E-Mail [REDACTED]@bellsouth.com

A. Available Numbers * [REDACTED]
B. Assigned Numbers * [REDACTED]
C. Total Numbering Resources * [REDACTED]
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * [REDACTED]
List excluded Code(s) or Block(s)
[REDACTED]

E. Growth History - Previous 6 months² *

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

F. Forecast - Next 12 months³ *

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

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

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

REDACTED

Block Requested	A. Available Numbers	H. Months to Exhaust
1	[REDACTED]	29.152

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **74.039**

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.

²Net 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.

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

⁴To 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)).

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

Continue

Pooling Administration System

[REDACTED]@bridge.bellsouth.com (SP)

Sign Out

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

Your utilization calculates to **74.039 percent**. The FCC requires a utilization of **75.000 percent**.

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

Submit

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	292				
Jacksonville	Ft. Caroline	JCVLFLFCDS0	34				
Jacksonville	Ft. George	FTGRFLMARS0	5				
Jacksonville	Int. Airport	JCVLFLIARS0	11				
Jacksonville	Lake Forest	JCVLFLLFDS0	52				
Jacksonville	Loretto	MNDRFLLODS0	80				
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

[REDACTED]