

Manuel A. Gurdian General Attorney

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June 15, 2009

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

> Petition for the Expedited Review of Growth Code Re:

Denial by the Number Pooling Administrator for the

Homestead Exchange (Naranja)

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,

Gurdian

cc: All Parties of Record Jerry D. Hendrix Gregory R. Follensbee

COM _E. Earl Edenfield, Jr.

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FPSC-COMMISSION CLERK

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

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

First Class U.S. Mail this 15th day of June, 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

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 Homestead exchange (Naranja))	Filed: June 15, 2009
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<u>PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL</u>

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 Homestead 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

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 Homestead exchange consists of four (4) central offices and four (4) switching entities that utilize numbering resources: Air Force Base (HMSTFLAFRS0), East (HMSTFLEARS0), Main (HMSTFLHMDS0) and Naranja (HMSTFLNARS0).
- 5. On June 10, 2009, AT&T Florida requested additional numbering resources from NeuStar for the Naranja (HMSTFLNARS0) switch. See Attachment 1. Specifically, AT&T Florida requested 5 blocks to meet the request of a specific customer for 5,000 consecutive numbers in the format of 305 NXX-4XXX-8XXX¹.
- 6. At the time of the code request, the Homestead exchange had a MTE of 17.11 and a utilization of 63.79%, while the MTE for the Naranja (HMSTFLNARS0) switch was 77.43.
- 7. On June 10, 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 Homestead exchange and the customer's contact information. See Attachment 2.

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¹ The customer wants 305 NPA numbers. However, since the Commission required all 305 NPA NXXs to be held for the Keys, the customer can use 786 NPA numbers instead.

- 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'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 Homestead exchange; and
- 2. The Commission direct NeuStar to provide the requested numbering resources for the Homestead exchange as discussed above.

Respectfully submitted this 15th day of June, 2009.

AT&T FLORIDA

E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

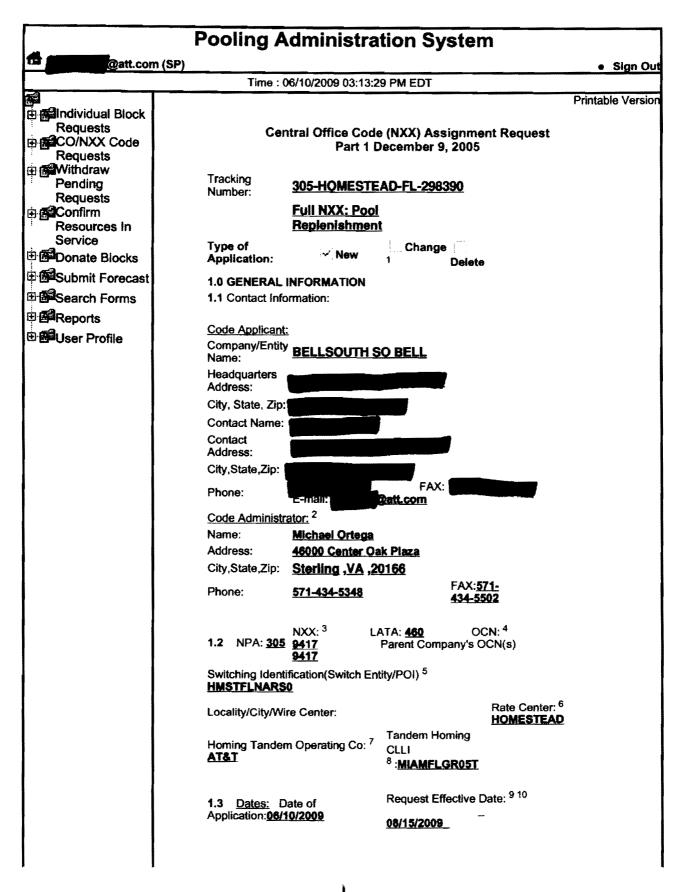
150 South Monroe Street

Suite 400

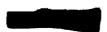
Tallahassee, Florida 32301

(305) 347-5558

737337



appli	By selecting this checkbox, I acknowledge that I am requesting the earliest sible effective date the Administrator can grant. Please note that this only ies to a reduction in the Administrator's processing time, however the est will still be processed in the order received.
Requ	uest Expedited Treatment? YesNoX
1.4 Loc	a) Type of company/entity requesting the code:
	b) Types of service: <u>Wireline</u> (e.g., Cellular - Type 2)
	c) Code Assignment Preference (Optional) 305-xxx-4, 305- xxx-5, 305-xxx-6, 305-xxx-7, 305-xxx-8
	d) Codes that are undesirable, if any666,999,888
	e) Type of change(Mark <u>all</u> that apply)
	OCN-Intra-company 11 Switching Id Rate Center Tandem Homing CLLI
	OCN-Inter-company 12 Effective Date LATA Extend Reservation
1.5	Type of Request (Initial, growth, etc.)Growth
olace exha	initial code, attach(1) evidence of certification and (2) proof of ability to e code in service within 60 days. If a growth code, attach months to just worksheet. Pooling Indicator: 13 Yes No
İ	Pooling Indicator: 19 17 198 1. No
1.6	NPA Jeopardy Criteria Apply: Yes No
1.7 CUS	Code request for new service (Explain): REQUEST CODE TO MEET TOMER NEEDS
Addi	Part 2 is attachedPart 2 is not attachedX for BIRRDS ^{14 15} tional Documentation is attached Additional Documentation is not chedX
Com	ments:
true has	reby certify that the above information requesting an NXX code is and accurate to the best of my knowledge and that this application been prepared in accordance with Central Office Code (NXX) gnment Guidelines posted to the ATIS Web Site
(http	o://www.atis.org/atis/clc/inc/incdocs.htm) as of the date of this lication: 16



Signature of Code Applicant

Technical Support Analyst

06/10/2009

Title

Date

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

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

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) 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 Telcordia TM Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

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

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ 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 code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

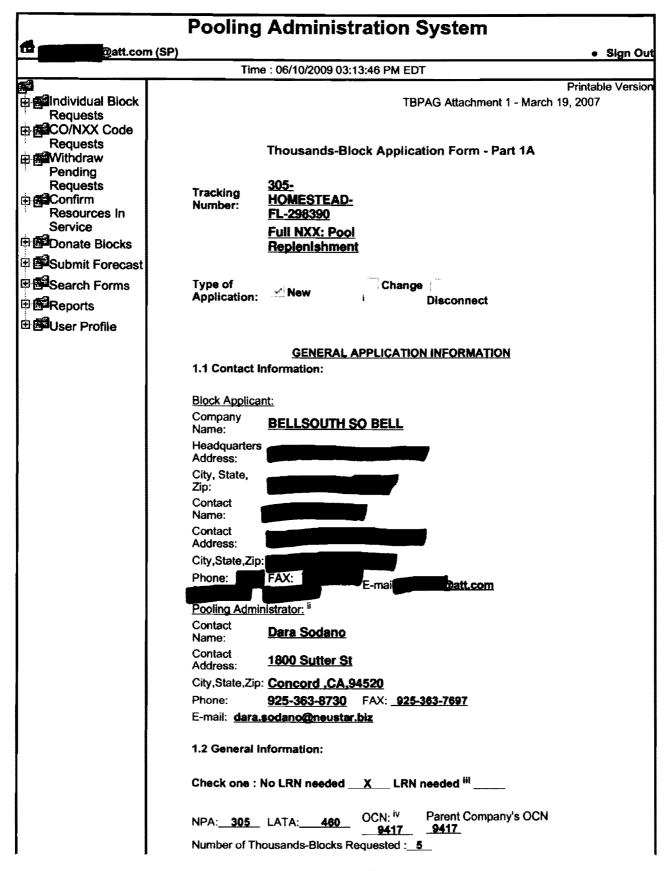
¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia TM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! 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.

¹⁶ An incomplete form may result in delays in processing this request.







City or Wire Center Name :	
on or vino oonar vario	Rate Center: ^{vi} — HOMESTEAD
Rate Center Sub Zone:	-
1.3 Dates:	
Date of Application: ^{vii} _ 06/10/2009	Requested Block Effective Date: viii 08/15/2009
possible effective date the Adm	, I acknowledge that I am requesting the earliest ninistrator can grant. Please note that this only ministrator's processing time, however the request ler received.
Request Expedited Treatment?	? (See Section 8.6) YesNoX
1.4 Type of Service Provider	Requesting the Thousands-Block :
a) Type of Service Provider :(LEC, IXC, CMRS, Other)	Incumbent Local Exchange Carrier (ILEC)
	ocks to be used for : Wireline
c) Thousands-Block(s) (NXX 305-xxx-4, 305-xxx-5, 305-xx	-X) assignment Preference (Optional) x-6, 305-xxx-7, 305-xxx-8
	(-X) that are undesirable for this assignment, if any
e) If requesting a code for LF keeping(the remainder of the b	RN purposes, indicate which block(s) you will be blocks will be given to the pool)
1.5 Type of Request:	
Initial block for rate center : Yes and proof of capability to provice	· · · · · · · · · · · · · · · · · · ·
Initial block for rate center : Yes and proof of capability to provic Growth block for rate center : Y	sif Yes , attach evidence of authorization de service within 60 days. 'es X if Yes , attach months to exhaust
Initial block for rate center: Yes and proof of capability to provid Growth block for rate center: Yes worksheet By selecting this checkb block in red and explicitly unde	de service within 60 days.
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Initial block for rate center: Yearnd proof of capability to provid Growth block for rate center: Yearnd block for rate center: Yearnd selecting this checkb block in red and explicitly unde activated in the PSTN and load. Type of change(Mark <u>ali</u> that a OCN:Intra-company	de service within 60 days. YesXIf Yes , attach months to exhaust Nox, I acknowledge that I am willing to accept a restand that the underlying CO code may not yet be led in the NPAC on the block effective date. Apply) y ix Switching Id Part 1B y x Effective Date
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Initial block for rate center: Yearnd proof of capability to provid Growth block for rate center: Yearnd proof of capability to provid Growth block for rate center: Yearnd services and services are services and services are services and services and services and services are services and services are services and se	de service within 60 days. YesX If Yes , attach months to exhaust Nox, I acknowledge that I am willing to accept a restand that the underlying CO code may not yet be led in the NPAC on the block effective date. Apply) y ix Switching Id Part 1B y x Effective Date If Yes , list NPA-NXX-X
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Disconnect block : Yesif Yes , list NPA-NXX-X	
Remarks:	

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) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.



Technical 06/10/2009 Support <u>Anaiyst</u> Title

<u>Associate</u>

Signature of Block Applicant

Date

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.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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 TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumenc assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider xi. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth 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 must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new 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,





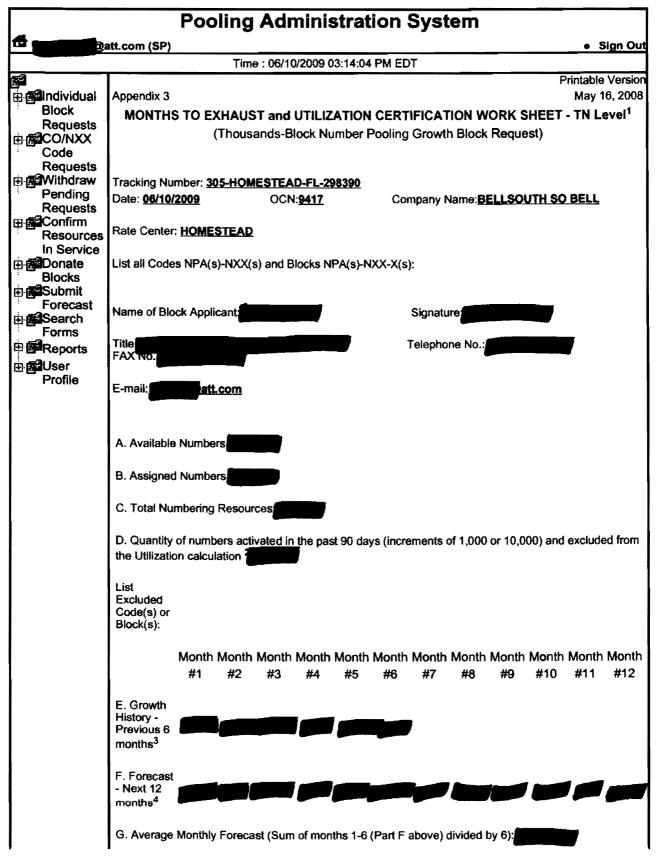
and providing their title and date.

Foot Notes:

- Identify the type of change(s) in Section 1.5.
- * The Pool Administrator is available to assist in completing these forms.
- iii A CO Code application will also need to be submitted to the PA.
- iv Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code 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).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.
- vi Rate Center name must be a tariffed Rate Center.
- vii Acknowledgment and indication of disposition of this application will 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 NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- X Select if you are not the current Block Holder
- Xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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H. Months to Numbers Available for Assignment to Exhaust ⁵ Customers(A)
Average Monthly Forecast(G)
Block Requested Available Numbers Months To Exhaust 17.113 17.954 3 18.795 4 19.635 5 20.476
I. Utilization ⁶ Assigned Numbers(B) - Excluded Numbers(D)
Total Numbering Resources(C)-Excluded Numbers(D)
<i>}</i>
Explanation:
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 Quantity 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).
³ 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.
⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
⁵ 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, section 52.15 (g) (3) (iii)).
⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))
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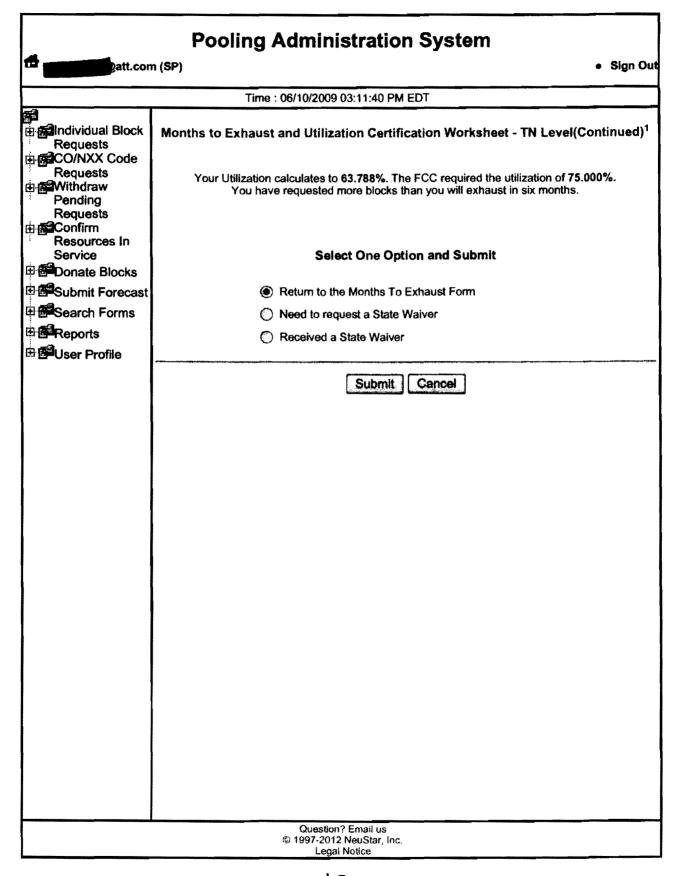
Greer, Stan L REDACTED From: dara.sodano@neustar.biz Sent: Wednesday, June 10, 2009 3:13 PM To: Cc: PA Part3@neustar.biz Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 305-HOMESTEAD-FL-298390 Trusted to bring networks together Pooling Administration System **Dated 10 June 2009** November 21, 2003 Attachment 3 ATIS-0300066.at3 Pooling Administrator's Response/Confirmation **TBPAG Part 3** 305-HOMESTEAD-Tracking Number: FL-298390 Date of Application: 06/10/2009 Effective Date: Date of Receipt: Date of Response: 06/10/2009 06/10/2009 Service Provider Name: **BELLSOUTH SO BELL** (Telcordia TM LERG TM 9417 Routing Guide) OCN: NPAC SOA SPID: **Pooling Administrator Contact Information: Dara Sodano** Phone: 925-363-8730 Signature of Pooling Administrator Dara Sodano 925-363-7697 Fax: Name (print) Email: dara.sodano@neustar.blz NPA-NXX or NPA-Block Assigned: NXX-X: Block Reserved: **Block Reservation Expiration Date:** Block/Code Modified:

Block/Code

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 305-HOME... Page 2 of 2

REDAC	TED	Disconnected :			
	Block Contaminated(Yes or No): If Yes,enter the number of TNs contaminated: Switch Identification(Switch Entity/POI): 1	HMSTFLNARS0			
	Rate Center: Rate Center Sub Zone:	HOMESTEAD			
<u>x</u>	Form Complete, request denied. Explanation: DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Walver 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 admir	nistrator.			
Rer	marks:				

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM 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.)



Homestead Utilization Summary Report (Naranja)

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Available TNs	Average Growth	MTE	Util
Homestead	Air Force Base	HMSTFLAFRS0	4				
Homestead	East	HMSTFLEARS0	7				
Homestead	Main	HMSTFLHMDS0	63				
Homestead	Naranja	HMSTFLNARS0	24				

Customer Information

