General Attorney

AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301

T: (850) 577-5508 th9467@att.com

REDACTED

December 10, 2012

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

> Docket No. 120310-TL Re:

Petition for Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Orange Park exchange (Ridgewood)

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, LLC 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.

cc: All Parties of Record Gregory R. Follensbee Suzanne L. Montgomery

COM	
AFD	
APA	
ECO	
ENG	
GCL	2
IDM	
TEL	5
CLK	

MODERATE ROMES OF DETE

98062 DEC 10 º

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Orange Park exchange (Ridgewood)

Docket No.: 120310 - 72

Filed: December 10, 2012

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

BellSouth Telecommunications, LLC 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-01-1973-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 Orange Park exchange. In support of this petition, AT&T Florida states:

PARTIES

- 1. AT&T Florida is a limited liability company 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

TO MENTS OF MICHIGAN PATE

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 Orange Park exchange consists of two (2) switching entities that utilize numbering resources: Main (ORPKFLMADS0) and Ridgewood (ORPKFLRWDS0).
- 5. On November 28, 2012, AT&T Florida requested additional numbering resources from NeuStar for the Ridgewood (ORPKFLRWDS0) switch. See Attachments 1. Specifically, AT&T Florida requested a single number block of 5,000 numbers to meet the request of a specific customer. Due to the customer's dialing patterns, the customer needs a specific block in the format of NPA NXX-0, 1, 2, 3, 4. Since this combination is not available in the numbering pool, AT&T will need to request a full NXX code be opened to meet this request. The remaining 5 blocks will be used for the Orange Park pool.
- 6. At the time of the code request, the Orange Park exchange had a MTE of 14.11 and a utilization of 59.88%, while the MTE for the Ridgewood (ORPKFLRWDS0) switch was 676.81 with a utilization of 79.57%.
- 7. On November 28, 2012, 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 customers 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'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 new FCC 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, which have recently entered the local service market, 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 Orange Park exchange; and
- 2. The Commission direct NeuStar to provide the requested numbering resources for the Orange Park exchange as discussed above.

Respectfully submitted this 10th day of December 2012.

AT&T FLORIDA

Suzanne . Montgomery

Authorized House Counsel No. 94116

Tracy W. Hatch

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

1051767

Pooling Administration System	
-	Sign Out
Time: 11/28/2012 03:08:58 PM EST	
Time: 11/28/2012 03:08:59 PM EST	Sign Out
1.3 <u>Dates</u> : Date of Request Effective Date: 9 10 Application: 11/28/2012 02/02/2013	
	Time: 11/28/2012 03:08:58 PM EST Printable Central Office Code (NXX) Assignment Request Part 1 December 9, 2005 Tracking Number: 904-ORANGEPARK-FL-593207 Full NXX: Pool Replantament Type of Application: New Change Delete 1.0 GENERAL INFORMATION 1.1 Contact Information: Code Applicant; Company/Entity BELLSOUTH TELECOMM INC DBA SOUTHERN Name: BELL TEL 5 TEL Headquarters Address: City, State, Zip: Contact Name: FAX: Phone: F-mail: Patt.com Code Administrator: Name: Code Address: 48000 Center Oak Plaza City, State Zip: Sterling VA 20185 Phone: 571-434-5348 FAX: 571-334-5502 NXX: 3 LATA: 452 OCN: 4 Parent Company's OCN(s) 1.2 NPA: 904 9417 Parent Company's OCN(s) 4417 Switching Identification(Switch Entity/POI) 5 ORPKET RWD80 Locality/City/Wire Center: Rate Center: 6 ORANGEPARK Tandem Homing CLLI 6: JCVLFLCL05T Request Effective Data: 9 10 Application: 11/28/2012

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? YesNoX
1.4 a) Type of company/entity requesting the code: <u>incumbent</u> <u>Local Exchange Carrier (ILEC)</u> (LEC, IC, CMRS, Other)
b) Types of service: Wireline (e.g., Cellular - Type 2)
c) Code Assignment Preference (Optional) 904-xxx-0, 904- xxx-1, 904-xxx-2, 904-xxx-4
d) Codes that are undesirable, if any
e) Type of change(Mark <u>all</u> that apply)
☐ OCN-Intra-company 11 ☐ Switching Id ☐ Rate Center ☐ Tandem Horning CLLI
☐ OCN-Inter-company 12 ☐ Effective Date ☐ LATA ☐ Extend Reservation
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):
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.
Comments:
I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (http://www.atis.org/atis/cic/inc/incdocs.htm) as of the date of this application: 14
Sc.

Signature of Code Applicant

Specialist 11/28/2012 Title Date

Back

neustar.

Question? Email us © 1997-2012 Neuster, Inc. Legal Notice

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 (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 Telcordia TM Routing Administration (TRA) on 732-899-6700.

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 toil 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 shall 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 An incomplete form may result in delays in processing this request.

	Pooling Administration System	
datt.com (SP)	◆ Sign	Out
	Time: 11/28/2012 03:09:28 PM EST	
最近 由度型individual Block Requests 由超2CO/NXX Code	Printable Vers TBPAG Attachment 1 - March 19, 2007	sion
Requests Baswithdraw Pending	Thousands-Block Application Form - Part 1A	
Requests 由蛋Confirm Resources in Service 即置Donate Blocks 即置Submit Forecast	Tracking ORANGEPARK- Number: FL-593207 Full NXX: Pool Replenishment	
Baserch Forms Bareports Baser Profile	Type of Change C	
	GENERAL APPLICATION INFORMATION	I
	1.1 Contact Information:	
	Block Applicant: Company BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL	İ
	Company <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL</u> Name: <u>& TEL</u>	
	Headquarters	
	City, State, Zip:	
	Contact Name:	
	Contact Address:	
	City, State, Zip:	1
	Phone: FAX:E-mail:	ı
	Pooling Administrator: #	
	Contact Dara Flowers Name:	
	Contact 1800 Sutter St	
	City,State,Zip: Concord .CA.94520	
	Phone: <u>925-363-8730</u> FAX: <u>925-363-7697</u>	
	E-mail: dara.flowers@neustar.biz	
	1.2 General Information:	
	Check one: No LRN needed X LRN needed III	
	NPA: 904 LATA: 452 OCN: Number of Thousands-Blocks Requested : 5	

REDACTED Page 2 of 4

Sw —	vitching Identification(Switch Entity/POI): V ORPKFLRWDS0
Cir	ty or Wire Center Name : Rate Center; vi
Ra	ate Center Sub Zone:
1.3	3 Dates:
	ate of Application: Vii Requested Block Effective Date: Viii //28/2012 02/02/2013
po ap	By selecting this checkbox, I acknowledge that I am requesting the earliest assiste effective date the Administrator can grant. Please note that this only oblies to a reduction in the Administrator's processing time, however the request it still be processed in the order received.
Re	equest Expedited Treatment? (See Section 8.6) YesNoX
1.4	4 Type of Service Provider Requesting the Thousands-Block :
a) (L	Type of Service Provider : <u>Incumbent Local Exchange Carrier (RLEC)</u> EC, IXC, CMRS, Other)
b)	Primary type of service Blocks to be used for : Wireline
	Thousands-Block(s) (NXX-X) assignment Preference (Optional)
ď)	Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any
	If requesting a code for LRN purposes, indicate which block(s) you will be seping(the remainder of the blocks will be given to the pool)
1.6	5 Type of Request:
	itial block for rate center: YesIf Yes, attach evidence of authorization deproof of capability to provide service within 60 days.
	rowth block for rate center: Yes X If Yes, attach months to exhaust orksheet
in ac	By selecting this checkbox, I acknowledge that I am willing to accept a block red and explicitly understand that the underlying CO code may not yet be tivated in the PSTN and loaded in the NPAC on the block effective date.
T ₃	ype of change(Mark <u>all</u> that apply)
	☐ OCN:Intra-company ^{tx} ☐ Switching Id ☐ Part 1B
	☐ OCN:Inter-company × ☐ Effective Date
Ch	nange block : Yesif Yes , list NPA-NXX-X
1.0	6 Block Return :
a)	ls this block Contaminated Yes No
	If Yes how many TNs are NOT available for assignment :
c)	
d)	Has this block been protected from further assignment Yes No

Disconnect block : YesIf Yes , II	st NPA-NXX-X
Remarks:	
I hereby certify that the above informat true and accurate to the best of my kno	owledge and that this application has
been prepared in accordance with the Administration Guidelines (ATIS-03000 (http://www.atis.org/inc) or by contactinapplication.	66) available on the ATIS web site
Administration Guidelines(ATIS-03000 (http://www.atis.org/inc) or by contacting	66) available on the ATIS web site

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 Telcordia TM 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 alphanumeric assigned by Telcordia TM 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 xl. 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-block

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 stready has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.8 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.

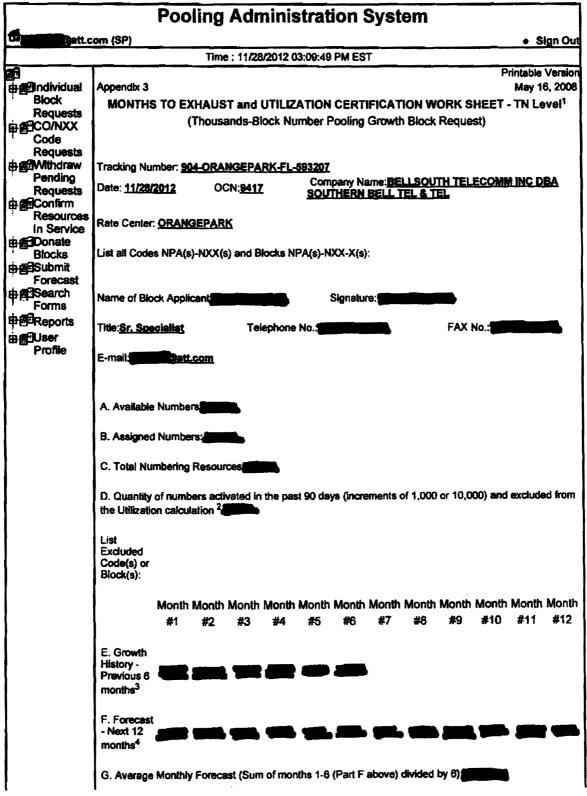
Foot Notes:

- ¹ Identify the type of change(s) in Section 1.5.
- ⁸ 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.
- 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.
- wiii 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 <u>not</u> the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Back

neustar.

Question? Email us • 1997-2012 Neustar, Inc. Legal Notice



H. Months	Numbers Available for Assignm	nant ta		
Exhaust ⁵	Customers(A)	nent to		
=			,	
	Average Monthly Forecast	(G)		
	Block Requested	Available Normbons	Marsha Ta Fulanca	
	biock requested	Available Numbers	Months To Exhaust	
	. 2		14.676	
	3		15,239	
	4	=	15.802	
	5		16.365	
1.	ssigned Numbers(B) - Excluded N	b		
	SMITEU NUTIDETS(D) - EXCILORU N	59.882		
	Total Numbering Resources(C)-E	Excluded		
	Numbers(D)			
1		•		
	•	•		
Explanation:				
_				
¹ A copy of this	worksheet is required to be subr	nitted to the Pooling Administra	ator when requesting	
of this docume	bering resources in a rate center	. For auditing purposes, the ap	plicant must retain a copy	
² Quantity of nu	umbers activated in the past 90 d	avs is hased on blocks and/or	codes received from the	
administrator s	and shall be reported in increment beived =10,000).	ts of 1,000 or 10,000 TNs (e. g	.: 2 blocks received=2,000	
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))				
		Back		
<u> </u>	Question? Em	au šer		
	© 1997-2012 Neu			

neustar.

Legal Notice

	Pooling Admi	nistration (System	
(Si	P)			Sign Out
	Time : 11/28/20	12 03:10:59 PM ES	T	
最適ndividual Block Requests 由調量CO/NXX Code Requests 設備記Withdraw	November 21, 2003 ATIS-0300066.at3 Pooling Ac	Iministrator's Re TBPAG Pa		Printable Version Attachment 3 ation
Pending Requests Base Confirm Resources in Service	Tracking Number :	904- ORANGEPARK- FL-693207		
Donate Blocks	Date of Application:	11/28/2012	Effective Date:	
## Submit Forecast	Date of Receipt:	11/28/2012	Date of Response:	11/28/2012
中 個 Reports 由個User Profile	Service Provider Name:	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
	(Telcordia TM LERG TM Routing Guide) OCN:	9417		
	Parent Company OCN:	9417		
	NPAC SOA SPID :			
	Pooling Administrator	r Contact informati	on:	925-363-
	Dara Flowers	Phone:		8730
	Signature of Pooling Administrator			
	Dara Flowers	Fax:		925-363- 7697
	Name (print)			
	Email:	dara.flo	wers@neustar.b	<u>iz</u>
	NPA-NXX or NPA-NXX-X :		Block Assigned	l:
			Block Reserved	*
			Block Reservati Expiration Date:	on
			Biock/Code Modified : Biock/Code	
		.m.s. 3	Disconnected:	
	Block Contaminate If Yes,enter the nur contaminated:	•		
		Switch Identification(Switch Entity/POI):		DS0
	Rate Center:		ORANGEPA	RK

	Rate Center Sub Zone:
	X Form Complete, request denied.
	Explanation: DR-67: 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 administrator. Explanation:
	Remarks:
	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.) Back:
neustar.	Question? Email us © 1997-2012 Neustar, Inc. Legal Notice

Pooling Administration System @att.com (SP) Sign Out Time: 11/28/2012 03:08:19 PM EST Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹ Your Utilization calculates to 59.882%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months. Select One Option and Submit C Return to the Months To Exhaust Form Need to request a State Waiver C Received a State Waiver Cancel Submit Question? Email us neustar. © 1997-2012 Neustar, Inc. Lega! Notice

Orange Park Utilization Summary Report

REDACTED

Exchange	Central Office	Wire Center CLLI	Blocks	Average Growth	Available TNs	MTE	Util
Orange Park	Main	ORPKFLMADS0	49				
Orange Park	Ridgewood	ORPKFLRWDS0	53				

Customer Contact Information

