



**TRACY W. HATCH**  
Assistant Vice President – Senior Legal Counsel  
AT&T Florida

AT&T Services, Inc.  
Legal Department  
675 West Peachtree Street, NE  
Suite 4324  
Atlanta, GA 30308

T: 404-927-5291  
F: 404-927-3636  
tracy.hatch@att.com  
Website: www.att.com

FILED 1/16/2018  
DOCUMENT NO. 00346-2018  
FPSC - COMMISSION CLERK

January 16, 2018

Carlotta S. Stauffer, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**REDACTED**

RECEIVED-FPSC  
2018 JAN 16 PM 4:35  
COMMISSION  
CLERK

**Re: Docket No.:** \_\_\_\_\_  
**Petition for Expedited Review of Growth Code Denials by the Number  
Pooling Administrator for the Tampa South-FL Exchange**

Dear Ms. Stauffer:

Enclosed is an original and seven copies of Teleport Communications America, LLC-FL's ("TCAL's") Petition for Expedited Review of Growth Code Denial, which we ask that you file in the above 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 enclosed Certificate of Service.

Sincerely,

Tracy W. Hatch

TWH/mhs  
Enclosures

cc: Elise R. Banister

1180270

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO \_\_\_  
ENG \_\_\_  
GCL \_\_\_  
IDM 7  
CLK \_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Re: Petition for Expedited Review of Growth ) Docket No.  
Code Denial by the Number Pooling Administrator ) Filed: January 16, 2018  
For the Tampa South-FL Rate Center )

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

Teleport Communications America, LLC - FL (“TCAL”) 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 TCAL’s request for additional numbering resources in the Tampa South rate center. In support of this petition, TCAL states:

**PARTIES**

1. TCAL is a corporation organized and formed under the laws of the State of New Jersey.
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 Tampa South-FL rate center consists of 1 switching entity, TAMPFLXAXJZ, with approximately 740 available numbers in 813-922-7.

5. On December 13, 2017, TCAL requested 3000 consecutive numbers from NeuStar, for the Tampa South-FL rate center, to satisfy the customer’s request.

6. At the time of the request, the Tampa South-FL rate center had a MTE of 5.28 months and utilization of 25.1%.

7. On December 13, 2017, NeuStar denied TCAL's request because TCAL had not met the utilization criteria, notwithstanding the fact that TCAL 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 customer 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 the specific number format to meet the customer's specific request. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

10. TCAL requests that the Commission's reverse NeuStar's decision to withhold numbering resources on the following grounds:

(a) NeuStar's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.

(b) As a result of NeuStar's denial of the request for additional numbering resources, TCAL is unable to provide telecommunications services to its customer as required under Florida law.

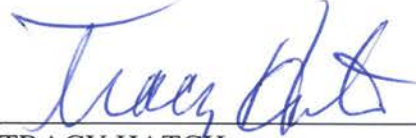
WHEREFORE, TCAL requests:

1. The Commission review the decision of NeuStar to deny TCAL's request for additional numbering resources for the Tampa South-FL rate center; and

2. The Commission direct NeuStar to provide the requested numbering resources for the Tampa South-FL rate center as discussed above.

Respectfully submitted this 16th day of January, 2018.

TELEPORT COMMUNICATIONS AMERICA, LLC



---

TRACY HATCH  
675 West Peachtree Street, NW  
Room 4324  
Atlanta, GA 30308  
(404) 927-5291

1180229

Tracking Number: 813-TAMPASTH-FL-1057893

Thousands-Block Application Form - Part 1A  
Revised: January 4, 2016

Individual Block Request

Type of Application:    New                    Change <sup>i</sup>                    Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Headquarters Address: [REDACTED]

City: [REDACTED]                    State: [REDACTED]                    ZIP: [REDACTED]

Contact Name: [REDACTED]

Contact Address: [REDACTED]

City: [REDACTED]                    State: [REDACTED]                    ZIP: [REDACTED]

Phone: [REDACTED]                    Fax: [REDACTED]

E-mail: [REDACTED]

Pooling Administrator:<sup>ii</sup>

Contact Name: Dara Flowers

Contact Address: 1800 Sutter St

City: Concord                    State: CA                    ZIP: 94520

Phone: 925-363-8730                    Fax: 925-363-7697

E-mail: dara.flowers@neustar.biz

1.2 General Information:

Check one : No LRN needed \_\_\_\_\_ LRN needed<sup>iii</sup>: \_\_\_\_\_

NPA: 813 LATA: 952 OCN<sup>iv</sup>: 8300 Parent Company's OCN 8300

Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI<sup>v</sup>):  
TAMPFLXAXJZ

Rate Center<sup>vi</sup>: TAMPASTH

1.3 Dates:

Date of Application<sup>vii</sup>:  
12/13/2017

Requested Effective Date<sup>viii</sup>:  
01/12/2018

Requested Expedited Treatment? (See Section 8.6) Yes  No \_\_\_\_\_

Expedited Explanation:

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) \_\_\_\_\_
- d) Thousands-Block(s) (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) \_\_\_\_\_

1.5 Type of Request:

Initial block for rate center : Yes \_\_\_\_\_ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes  If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

- OCN: Intra-company<sup>ix</sup>    Switching Id    Part 1B
- OCN: Inter-company<sup>x</sup>    Effective Date

Change block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

1.6 Block Return :

- a) Is this block Contaminated: Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_\_ No \_\_\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_\_ No \_\_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

[Redacted Signature]      [Redacted Title]      [Redacted Date]  
 Signature of Block Applicant    Title      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 Telcordia Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide<sup>xi</sup>. The Operating Company Number (OCN) assigned to the service provider 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). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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.

Footnotes:

- <sup>i</sup>Identify the type of change(s) in Section 1.5.
- <sup>ii</sup>The Pool Administrator is available to assist in completing these forms.
- <sup>iii</sup>A CO Code application will also need to be submitted to the PA.
- <sup>iv</sup>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).



<sup>v</sup>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 CLLI™ Code of the switch /POI.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

<sup>vii</sup>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.

<sup>viii</sup>Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>ix</sup>Select if you are the current Block Holder.

<sup>x</sup>Select if you are not the current Block Holder

<sup>xi</sup>Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 813-TAMPASTH-FL-1057893

Date: Wednesday,  
December 13, 2017

OCN: 8300

Company Name: TELEPORT COMMUNICATIONS  
AMERICA, LLC - FL

Rate Center: TAMPASTH

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 813 922 7 TAMPASTH 8300 1000

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: [REDACTED]

Phone: [REDACTED]

Fax:

E-Mail: [REDACTED]

A. Available Numbers: [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup> [REDACTED]

List  
Excluded  
Code(s) or  
Block(s):

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

E. Growth History - Previous 6 months<sup>4</sup>

F. Forecast - Next 12 months<sup>5</sup>

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

H. Months to Exhaust<sup>6</sup>

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

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>

I. Utilization<sup>7</sup>

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

Explanation: \_\_\_\_\_

<sup>1</sup>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.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>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).

<sup>4</sup>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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

**From:** dara.flowers@neustar.biz  
**Sent:** Wednesday, December 13, 2017 4:20 PM  
**To:** [REDACTED]  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** 813-TAMPASTH-FL-1057893 DENIED PAS - Part 3 Confirmation

**Pooling Administration System**

Dated 13 December 2017

Thousands-Block Number Pooling Administration Guidelines  
(TBPAG) - Part 3

Revised: January 4, 2016

**Pooling Administrator's Response/Confirmation**

Tracking Number : 813-TAMPASTH-FL-1057893

Date of Application: 12/13/2017 Effective Date: \_\_\_\_\_  
Date of Receipt: 12/13/2017 Date of Response: 12/13/2017

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL  
(LERG™ Routing Guide<sup>1</sup>) OCN: 8300  
Parent Company OCN: 8300

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Dara Flowers Phone: 925-363-8730  
Signature of Pooling Administrator  
Dara Flowers Fax: 925-363-7697  
Name (print)  
Email: dara.flowers@neustar.biz

NPA-NXX or  
NPA-NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_  
Block Reserved : \_\_\_\_\_  
Block Reservation  
Expiration Date : \_\_\_\_\_

Block/Code  
Modified : \_\_\_\_\_

Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated (Yes or No):

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

Switch Identification (Switching/POI)<sup>2</sup>: TAMPFLXAXJZ

Rate Center: TAMPASTH

Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver 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 Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

