



DOCKET NO. 20190192-TX

FILED 10/14/2019

DOCUMENT NO. 09373-2019

FPSC - COMMISSION CLERK

October 11, 2019

VIA OVERNIGHT DELIVERY

Attn: Director Adam Teitzman
c/o Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard, Suite 152
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
2019 OCT 14 AM 10:31
COMMISSION CLERK

RE: Docket No. XXXXXXXX – Petition of Orlando Telephone Company, Inc. d/b/a Summit Broadband (hereinafter Orlando Telephone Company) for Expedited Review of SOMOS’ denial of Application for Numbering Resources

Dear Mr. Teitzman:

Orlando Telephone Company submits for filing its Petition requesting that the Commission review SOMOS’s denial of Orlando Telephone Company’s application for nine (9) Thousand Blocks of telephone numbers in the Orlando, Florida rate center.

Pursuant to Section 364.183(3) Florida Statutes and Rule 25-22.006, Florida Administrative Code, Orlando Telephone Company hereby makes a claim of confidentiality for information contained in Exhibits 1 and 3 attached to the Petition. Exhibit 1 concerns a customer request for the assignment of telephone numbers that Orlando Telephone Company regards as confidential. Exhibit 3 concerns confidential information that reflects the number of telephone numbers being assigned in the Orlando, Florida rate center. One highlighted copy of the confidential information is enclosed in a sealed envelope. Two (2) redacted copies of the information are also included.

Thank you for your attention to this matter.

Sincerely,

Petra R. O’Neill
Contract & Regulatory Administrator

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Orlando Telephone Company, Inc. d/b/a Summit Broadband for Expedited Review of SOMOS' Denial of Application for Numbering Resources)
Docket No.)
Filed: October 11, 2019)
)
)
_____)

**PETITION OF ORLANDO TELEPHONE COMPANY, INC. D/B/A
SUMMIT BROADBAND FOR EXPEDITED REVIEW OF SOMOS' DENIAL
OF APPLICATION FOR NUMBERING RESOURCES**

Orlando Telephone Company, Inc., d/b/a Summit Broadband (hereinafter Orlando Telephone Company) requests that the Commission review SOMOS' denial of Orlando Telephone Company's application for nine (9) Thousand Blocks of telephone numbers (the nine (9) Thousand Blocks) in the Orlando, Florida rate center, overturn the decision, and order that the Thousand Blocks be assigned to Orlando Telephone Company. In support of this petition, Orlando Telephone Company states:

PARTIES

1. Orlando Telephone Company is a competitive local exchange telecommunications company that provides local exchange service and exchange access service in Florida.

2. SOMOS is an independent non-governmental entity that is responsible for administering and managing the numbering resources in pooling areas. See C.F.R. §52.20(d).

JURISDICTION

3. The Commission has jurisdiction of this matter under Section 364.16(7) Florida Statutes.

BACKGROUND AND REQUEST FOR RELIEF

4. A large business customer that uses a direct inward dial (DID) arrangement has requested that Orlando Telephone Company provide the first 500 consecutive DID telephone numbers from each of the nine (9) Thousand Blocks in the 407 NPA in the Orlando, Florida rate center so the customer can meet its dial plan arrangements. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Orlando Telephone Company does not have the first 500 consecutive telephone numbers from each of nine (9) Thousand Blocks in its inventory, it applied on October 4, 2019 to the Pooling Administrator, SOMOS, for the Thousand Blocks in the Orlando, Florida rate center. Orlando Telephone Company's application is attached as Exhibit 2.

6. SOMOS denied Orlando Telephone Company, Inc.'s request on October 4, 2019. The request was denied because Orlando Telephone Company did not meet the FCC criteria that SOMOS applies, even though Orlando Telephone Company does not have the numbering resources needed to satisfy its customer's request. Orlando Telephone Company's utilization did not meet the FCC's 75% threshold, or the six months-to-exhaust calculation. The Months-To-Exhaust and Utilization Worksheet is attached as Confidential Exhibit 3. SOMOS' denial of Orlando Telephone Company's application is attached as Exhibit 4.

7. The FCC has delegated authority to the Commission to address SOMOS' denial of a request for numbering resources, stating that "[w]e agree...that a safety valve mechanism should be established, and we delegate authority to state commissions to

hear claims that a safety valve should be applied when the... Pooling Administrator denies a specific request for numbering resources.”¹ Moreover, the FCC has determined that, “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request.” Specifically, states “may grant requests for customers seeking contiguous blocks of numbers.”²

8. Based on this authority, the Commission has issued a number of orders addressing denials by SOMOS’ that release numbering resources to meet specific customer needs. For example, the Commission ordered Neustar to provide CenturyLink with numbering resources to meet the service requirements of a customer that requested 5,000 consecutive numbers, even though CenturyLink had been unable to satisfy the months-to-exhaust or utilization criteria.³

9. SOMOS’ denial of sufficient numbering resources to Orlando Telephone Company to meet its customer’s request is inconsistent with the FCC’s position that “[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”⁴ By refusing to grant numbering resources sufficient to meet the needs of Orlando Telephone Company’s customer, SOMOS is preventing this customer from obtaining the service it wants from the carrier of its choice.

¹ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 95-116 ¶ 61 (2001).

² *Id.* ¶ 64.

³ *Petition for Expedited Review of NXX-X Code Denial*, Docket No. 120041-TL, Order No. PSC-12-0089-PAA-TL (March 1, 2012).

⁴ *Numbering Resource Optimization*, Second Report and Order and Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, FCC 00-429, CC Docket No. 99-200, CC Docket No. 96-98, ¶ 61 (2000).

10. Orlando Telephone Company's request for the nine (9) Thousand Blocks to meet its customer's request fits squarely within the framework established by the FCC for "safety valve" requests that the Commission is authorized to grant. Orlando Telephone Company respectfully requests that the Commission direct SOMOS to assign nine (9) Thousand Blocks for the Orlando, Florida rate center so that Orlando Telephone Company can satisfy its customer's request.

WHEREFORE, Orlando Telephone Company respectfully requests that the Commission review SOMOS' decision to deny Orlando Telephone Company's request for additional numbering resources, overturn that decision, and direct SOMOS to assign Orlando Telephone Company nine (9) Thousand Blocks in the Orlando, Florida rate center.

Respectfully submitted on October 11, 2019.

By: 

Petra R. O'Neill
4558 35th Street
Orlando, FL 32811
Telephone: (407) 996-7166
petra.oneill@summit-broadband.com

Contract & Regulatory Administrator for
Orlando Telephone Company, Inc. d/b/a
Summit Broadband

REDACTED

Tracking Number: **407-ORLANDO-FL-1189972**

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

**Individual Block
Request**

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTMS**
Headquarters Address: **4558 35th Street**
City: **Orlando** State: **FL** ZIP: **32811**
Contact Name: **Timothy Brodie**
Contact Address: **4558 35th Street**
City: **Orlando** State: **FL** ZIP: **32811**
Phone: **407-996-1179** Fax: **407-996-8901**
E-mail: **tbrodie@summit-broadband.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Dara Flowers**
Contact Address: **1800 Sutter St**
City: **Concord** State: **CA** ZIP: **94520**
Phone: **925-420-0367** Fax: **925-420-0377**
E-mail: **dflowers@somos.com**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: **407** LATA: **458** OCN^{iv}: **7857** Parent Company's OCN **7857**

Number of Thousands-Blocks Requested : **9**

Switch Identification (Switching Entity/POI^v):

ORLDFLMADSH

Rate Center^{vi}: ORLANDO

1.3 Dates:

Date of Application^{vii}:
10/04/2019

Requested Effective Date^{viii}:
11/04/2019

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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) No Preference
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any No Preference
- 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 X 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^{ix} Switching Id Part 1B
- OCN: Inter-company^x 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.

<u>Timothy Brodie</u>	<u>Comercial Install</u>	<u>10/04/2019</u>
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 (iconectivTM) LERGTM Routing Guide^{xi}, 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 iconectivTM 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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.

^{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 PSTN prior to the effective date of the block(s).

^{ix}Select if you are the current Block Holder.

^xSelect if you are not the current Block Holder

^{xi}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 Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 407-ORLANDO-FL-1189972

Date: Friday, October 4, 2019 OCN: 7857 Company Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS

Rate Center: ORLANDO

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 407-675-2, 407-815-1, 407-815-9, 407-313, 407-996.

Name of Block Applicant: Timothy Brodie Signature: Timothy Brodie

Title: Comercial Install

Phone: 407-996-1179-

Fax: 407-996-8901

E-Mail: tbrodie@summit-broadband.com

A. Available Numbers:

B. Assigned Numbers:

C. Total Numbering Resources:

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³:

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
months⁴

F. Forecast
- Next 12
months⁵

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

H. Months
to Exhaust⁶
=
Numbers Available for Assignment to
Customers (A)
Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1		8.735
2		9.401
3		10.068
4		10.735
5		11.401
6		12.068
7		12.735
8		13.401
9		14.068

I.
Utilization⁷
=
Assigned Numbers (B) X 100 = 43.035
Total Numbering Resources (C)-Excluded
Numbers (D)

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.

²List all numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as

needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired 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)

⁶Net 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.

⁷Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g) (4)(ii)).

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administrator Guidelines
(TBPAG) - Part 3
Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number :	<u>407-ORLANDO-FL-1189972</u>		
Date of Application:	<u>10/04/2019</u>	Effective Date:	_____
Date of Receipt:	<u>10/04/2019</u>	Date of Response:	<u>10/04/2019</u>
Service Provider Name:	<u>ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS</u>		
(LENS™ Routing Guide) OCN:	<u>7857</u>		
Parent Company OCN:	<u>7857</u>		
NPAC SOA SPID :	_____		
Pooling Administrator Contact Information:			
Dara Flowers	Phone:	<u>325-420-0367</u>	
Signature of Pooling Administrator			
Dara Flowers	Fax:	<u>325-420-0377</u>	
Name (print)			
Email:	<u>dflowers@somos.com</u>		
_____ 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): _____			
Rate Center: _____			
<u>X</u> Form complete, request denied.			

ORLDFLMADSH

ORLANDO

Explanation:

DR-57: You do not meet the NTE 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:

¹ 'Telcordia' is a registered trademark and LERGSM Routing Guide and iconectivSM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language¹ Location Code (CLLSM Code) of the switching entity/POI shown on the Part 1A form. Common Language¹ is a registered trademark and CLLSM is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines

(TBPA) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number: 407-ORLANDO-FL-1189972

Date of Application: 10/04/2019 Effective Date: _____

Date of Receipt: 10/04/2019 Date of Response: 10/04/2019

Service Provider Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS

(LERCSM Routing Guide) OCN: 7857

Parent Company OCN: 7857

NPAC SCA SPID: _____

Pooling Administrator Contact Information:

Dara Flowers _____ Phone: 925-420-0367

Signature of Pooling Administrator

Dara Flowers _____ Fax: 925-420-0377

Name (print)

Email: dflowers@somos.com

NP4-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 PO): ORLDPLMADSH

Rate Center: ORLANDO

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:

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

² 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 (CLL[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLL is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines

(TBPA) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number: 407-ORLANDO-FL-1189972

Date of Application: 10/04/2019 Effective Date: _____
Date of Receipt: 10/04/2019 Date of Response: 10/04/2019

Service Provider Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS
(LERGSM Routing Guide) OCN: 7857
Parent Company OCN: 7857

NPAC SDA SPID: _____

Pooling Administrator Contact Information:
Dara Flowers Phone: 925-420-0367
Signature of Pooling Administrator
Dara Flowers Fax: 925-420-0377
Name (print)
Email: dflowers@scoms.com

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 PO): ORLDFLMADSH
Rate Center: ORLANDO

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 (XXX-X) Pooling Administration Guidelines for the appeals process.

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Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines
(TBPA) - Part 3
Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number: 407-ORLANDO-FL-1189972

Date of Application: 10/04/2019 Effective Date: _____
Date of Receipt: 10/04/2019 Date of Response: 10/04/2019

Service Provider Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTMS
(LERG™ Routing Guide) OCN: 7857
Parent Company OCN: 7857

NPAC SQA SPID: _____

Pooling Administrator Contact Information:

Data Flowers: _____ Phone: 925-420-0367
Signature of Pooling Administrator
Data Flowers: _____ Fax: 925-420-0377
Name (print): _____
Email: dflowers@sosmos.com

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): ORLDFLMA0SH
Rate Center: ORLANDO

Form complete, request denied.

Explanation:

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Request Withdrawn.

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Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administrator Guidelines
(TSPAG) - Part 3
Revised: January 4, 2015
Pooling Administrator's Response/Confirmation

Tracking Number:	<u>407-ORLANDO-FL-1189972</u>		
Date of Application:	<u>10/04/2019</u>	Effective Date:	_____
Date of Receipt:	<u>10/04/2019</u>	Date of Response:	<u>10/04/2019</u>
Service Provider Name:	<u>ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS</u>		
(LERG™ Routing Guide) OCN:	<u>7957</u>		
Parent Company OCN:	<u>7957</u>		
NPAC SCA SPD:	_____		
Pooling Administrator Contact Information:			
Dara Flowers	Phone:	<u>925-420-0367</u>	
Signature of Pooling Administrator	_____		
Dara Flowers	Fax:	<u>925-420-0377</u>	
Name (print)	_____		
Email:	<u>dflowers@isomes.com</u>		
NPA-NXX or NPA-NXX-Y:	_____	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 TNo contaminated (1-1000):			_____
Switch Identification (Switching POI):			<u>ORLDLMDASH</u>
Rate Center:			<u>ORLANDO</u>
<input checked="" type="checkbox"/> 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:

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

² 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 (CLL[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLL is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number: 407-ORLANDO-FL-1189972

Date of Application: 10/04/2019 Effective Date: _____
 Date of Receipt: 10/04/2019 Date of Response: 10/04/2019

Service Provider Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS
 (LERGSM Routing Guide) OCN: 7867
 Parent Company OCN: 7867

NPA/ SQA SPD: _____

Pooling Administrator Contact Information:

Data Flowers Phone: 925-426-0367
 Signature of Pooling Administrator
Data Flowers Fax: 925-426-0377
 Name (print)
 Email: dflowers@somos.com

NPA-XXX or NPA-XXXX: _____ 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 TMs contaminated (1-1000): _____

Switch Identification (Switching PO): ORLDLMAQSH
 Rate Center: ORLANDO

Form complete, request denied.

Exhibit 4
Part 3 Denial

Tracking No. 1189972
Page 12 of 18

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:

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

² 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 (CLL[™] Code) of the switching entity/PCN shown on the Part 1A form. Common Language[®] is a registered trademark and CLL[™] is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines
(TBPAI) - Part 3
Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number: 407-ORLANDO-FL-1189972

Date of Application: 10/04/2019 Effective Date: _____
Date of Receipt: 10/04/2019 Date of Response: 10/04/2019

Service Provider Name: ORLANDO TEL CO AFFIL WITH ORLANDO BUS SYSTMS
(LERCSM Routing Guide) DCK: 7857
Parent Company DCK: 7857

NPAC SOA SPID: _____

Pooling Administrator Contact Information:
Dara Flowers Phone: 925-420-0367
Signature of Pooling Administrator
Dara Flowers Fax: 925-420-0377
Name (print)
Email: dflowers@somes.com

NPA-NXX or NFA-NXX-XX: _____

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 TMs contaminated (1-1000): _____

Switch Identification (Switching/PCI): ORLDFLMADSH
Rate Center: ORLANDO

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:

¹ 'Telcordia' is a registered trademark and LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language¹ Location Code (CLLTM Code) of the switching entity/POI shown on the Part 1A form. Common Language¹ is a registered trademark and CLL is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines

(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number:	<u>407-ORLANDO-FL-1189972</u>		
Date of Application:	<u>10/04/2019</u>	Effective Date:	_____
Date of Receipt:	<u>10/04/2019</u>	Date of Response:	<u>10/04/2019</u>
Service Provider Name:	<u>ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS</u>		
(LERG™ Routing Guide) OCN:	<u>7857</u>		
Parent Company OCN:	<u>7857</u>		
NPAC SDA SPD:	_____		
Pooling Administrator Contact Information:			
Dara Flowers	Phone:	<u>925-426-0087</u>	
Signature of Pooling Administrator			
Dara Flowers	Fax:	<u>925-426-0077</u>	
Name (print)			
Email: <u>dflowers@somos.com</u>			
NP4-NX2 or NP4-NX3-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 TIs contaminated (1-1000):			_____
Switch Identification (Switching/POI):			<u>ORLDFLMADSH</u>
Rate Center:			<u>ORLANDO</u>
<input checked="" type="checkbox"/> Form complete, request denied.			

Exhibit 4
Part 3 Denial

Tracking No. 1189972
Page 16 of 18

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:

¹ Telcordia¹ is a registered trademark and LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language¹ Location Code (CLLTM Code) of the switching entity/POI shown on the Part 1A form. Common Language¹ is a registered trademark and CLL is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3
Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number:	<u>407-ORLANDO-FL-1189972</u>		
Date of Application:	<u>10/04/2019</u>	Effective Date:	_____
Date of Receipt:	<u>10/04/2019</u>	Date of Response:	<u>10/04/2019</u>
Service Provider Name:	<u>ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS</u>		
(LERG™ Routing Guide) DCN:	<u>7857</u>		
Parent Company DCN:	<u>7857</u>		
NPAC SDA SPD:	_____		
Pooling Administrator Contact Information:			
Dara Flowers	Phone:	<u>925-420-0367</u>	
Signature of Pooling Administrator			
Dara Flowers	Fax:	<u>925-420-0377</u>	
Name (print)			
Email: <u>dflowers@somos.com</u>			
_____ 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 TIs contaminated (1-1000):			_____
Switch Identification (Switching POI):			<u>ORLDFLMADSH</u>
Rate Center:			<u>ORLANDO</u>
<input checked="" type="checkbox"/> Form complete, request denied.			

Explanation:

DR-67: 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:

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

² 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 (CLL[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLL[™] is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Exhibit 4
Part 3 Denial

Tracking No. 1189972
Page 16 of 18

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:

¹ Telcordia¹ is a registered trademark and LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language¹ Location Code (CLLTM Code) of the switching entity/POI shown on the Part 1A form. Common Language¹ is a registered trademark and CLL is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Pooling Administration System

Dated 04 October 2019

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3
Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number:	<u>407-ORLANDO-FL-1189972</u>		
Date of Application:	<u>10/04/2019</u>	Effective Date:	_____
Date of Receipt:	<u>10/04/2019</u>	Date of Response:	<u>10/04/2019</u>
Service Provider Name:	<u>ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTEMS</u>		
(LERG™ Routing Guide) DCN:	<u>7857</u>		
Parent Company DCN:	<u>7857</u>		
NPAC SDA SPD:	_____		
Pooling Administrator Contact Information:			
Dara Flowers	Phone:	<u>925-420-0367</u>	
Signature of Pooling Administrator			
Dara Flowers	Fax:	<u>925-420-0377</u>	
Name (print)			
Email: <u>dflowers@somos.com</u>			
_____ 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 TIs contaminated (1-1000):		_____	
Switch Identification (Switching POI):		<u>ORLDFLMADSH</u>	
Rate Center:		<u>ORLANDO</u>	
<input checked="" type="checkbox"/> Form complete, request denied.			

Explanation:

DR-67: 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-N) Pooling Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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

² 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 (CLL[™] Code) of the switching entity/PON shown on the Part 1A form. Common Language[®] is a registered trademark and CLL[™] is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.