



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

AT&T Services, Inc.  
Legal Department  
150 South Monroe St.  
Suite 400  
Tallahassee, FL 32301

T: 850-577-5505  
F: 850-222-4401  
Email: tracy.hatch@att.com

FILED 1/24/2020  
DOCUMENT NO. 00544-2020  
FPSC - COMMISSION CLERK

January 24, 2020

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

**REDACTED**

**Re: Docket No.: \_\_\_\_\_  
Petition for Expedited Review of Growth Code Denial by the Number  
Pooling Administrator for the Sebring Rate Center**

Dear Mr. Teitzman:

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 Hatch

TWH/ns  
Attachments

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL 1
- IDM 6
- 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 24, 2020  
For the Sebring 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 (“Somos”) denial of TCAL’s request for additional numbering resources in the Sebring 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. Somos 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 Somos’s decision to deny numbering resources to the appropriate regulatory authority.

**BACKGROUND AND REQUEST FOR RELIEF**

4. The Sebring rate center is served by the FTMYFLXAX1Z switch where 863-451-4 and 863-593-6 has 950 and 475 numbers available respectively.
5. On October 28, 2019 TCAL requested 2500 consecutive numbers from Somos, for the Sebring rate center, to satisfy the customer’s request.

6. At the time of the request, the Sebring rate center had a month-to-exhaust (MTE) of 5.27 months and utilization of 22.55%.
7. October 28, 2019, Somos denied TCAL's request because TCAL had not met the utilization threshold, 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 Somos'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 reverse Somos's decision to withhold numbering resources on the following grounds:
  - (a) Somos's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.
  - (b) As a result of Somos'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 Somos to deny TCAL's request for additional numbering resources for the Sebring rate center; and
2. The Commission direct Somos (Pooling Administrator effective 1/1/19) to provide the requested numbering resources for the Sebring rate center as discussed above.

Respectfully submitted this 24th day of January, 2020.

Teleport Communications America, LLC

A handwritten signature in blue ink, appearing to read "Tracy Hatch", is written over a horizontal line.

Tracy Hatch  
150 South Monroe St.  
Suite 400  
Tallahassee, FL 32301  
850-577-5505  
Email: [th9467@att.com](mailto:th9467@att.com)

Attorney for Teleport Communications, LLC

Tracking Number: **863-SEBRING-FL-1193912**

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: [REDACTED]  
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: **925-420-0367** Fax: **925-420-0377**  
E-mail: **dflowers@somos.com**

1.2 General Information:

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

NPA: **863** LATA: **939** OCN<sup>iv</sup>: **8300** Parent Company's OCN **7125**

Number of Thousands-Blocks Requested : **3**

Switch Identification (Switching Entity/POI<sup>v</sup>): **FTMYFLXAX1Z**

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

1.3 Dates:

Date of Application<sup>vii</sup>: 10/28/2019

Requested Effective Date<sup>viii</sup>: 11/28/2019

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) 4000  
CONSECUTIVE tns
- 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 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<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](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

\_\_\_\_\_  
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<sup>TM</sup> 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<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> 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: **863-SEBRING-FL-1193912**

Date: **Monday, October 28, 2019** OCN: **8300** Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - FL**

Rate Center: **SEBRING**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: **863-451-4, 863-593-6,**

Name of Block Applicant: [Redacted]

Signature: [Redacted]

Title: [Redacted]

Phone: [Redacted]

Fax: [Redacted]

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):

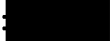
Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

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


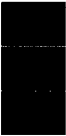

[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
------------	------------	------------	------------	------------	------------


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>List 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.

<sup>3</sup>The 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).

<sup>4</sup>The 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).

<sup>5</sup>Quantity 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).

<sup>6</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>7</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This 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)).

<sup>10</sup>This 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)).