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July 10, 2007

Ms. Ann Cole
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Request for Waiver of Pooling Administrator's Denial of Verizon Wireless' Request for a Thousands-Block From a New NXX Code to Replenish the Bradenton, FL Pool

Dear Ms. Cole:

Please find enclosed the above-referenced filing on behalf of Verizon Wireless. Please note that Attachment 1 to the filing contains confidential and proprietary business information. Pursuant to rule 25-22.006(5), Florida Administrative Code, Verizon Wireless requests that the highlighted information contained in Attachment 1 be treated by the Commission as confidential and withheld from public inspection. In accordance with the rule, please find enclosed one copy of Attachment 1 with the confidential information highlighted, and two redacted copies.

Should you have any questions about this filing, please give me a call.

Sincerely,

Donna E. Blanton

SCR ____

RCA

CMP

COM

CTR

ECR

GCL _ OPC

SGA ____

SEC

OTH Crant

records

Dana Crandall Lolita Forbes

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DNOS 181 . The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

ORIGINAL



July 9, 2007



Verizon Wireless Numbering Policy & Standards 500 West Dove Road Southlake, TX 76092

Ms. Ann Cole Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> RE: Request for Waiver of Pooling Adminstrator's Denial of Verizon Wireless' Request for A Thousands-Block From a New NXX Code To Replenish the Bradenton, FL Pool

Dear Ms. Cole:

Verizon Wireless respectfully submits this request for application of a "safety valve waiver" for thousands-block acquisition in the state of Florida. By this letter, Verizon Wireless requests that the Florida Public Service Commission ("Commission"):

- 1) Overturn a denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of Verizon Wireless' application for a thousands-block of telephone numbers from a new NXX code;
- 2) Authorize the PA to assign the requested thousands-block from a new NXX code so that Verizon Wireless may utilize the thousands-block in the testing and commissioning of a new switch; and
- 3) Direct the PA to make the remaining nine thousands-blocks from the new NXX code unavailable for assignment until Verizon Wireless notifies the PA that such thousands-blocks are viable for assignment.

This request is based on the FCC Rules at 47 C.F.R. 52.15(g)(3)(iv)² and pursuant to the Thousands-Block (NXX-X) Number Pooling Administration Guidelines ("Pooling Guidelines") and the Central Office Code Assignment Guidelines ("CO Code Guidelines") published by the Alliance for Telecommunications Industry Solutions' Industry Numbering Committee ("ATIS INC")³. On July 2, 2007, Verizon Wireless submitted an application to the PA for a thousands-block from a new NXX code (via a request to the PA to "replenish the pool") in the Bradenton rate center. Verizon Wireless met the Pooling Guidelines requirements for a growth thousands-block⁴, but the PA immediately denied the request to replenish the pool because there was an adequate quantity of thousandsblocks in the Bradenton pool such that a new NXX code did not need to be opened.

Verizon Wireless will install a new mobile switch on November 9, 2007 in the Bradenton area to accommodate the tremendous customer growth Verizon Wireless has experienced in Florida. In installing a new switch, Verizon Wireless must engage in extensive testing with the equipment vendor

¹ Pursuant to Federal Communications Commission ("FCC") Order 01-362, released December 28, 2001, in which the FCC delegated authority to state commissions "to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denies a specific request for numbering resources". See 01-362, ¶ 61.

² The federal rules in 47 C.F.R. 52.15 generalize responsibilities of North American Numbering Plan Administration ("NANPA") and the PA under the heading "central office code administration".

These guidelines are located on the ATIS INC website: http://www.atis.org/inc/docs.asp.

These guidelines are located on the ATIS INC website. Integrity in the ATIS INC website. In ⁵ A copy of the PA's Part 3 denial is appended. See Attachment 2.

and the interconnecting tandem owner before adding any customers to the switch. The testing and "turn-up" process requires Verizon Wireless to be the code holder of a new NXX code so that it can establish multiple test numbers in the new switch before the switch becomes "live". Being assigned a thousands-block from a new NXX code for which Verizon Wireless is the code holder, and having no customers in that new NXX code is essential for testing Emergency E9-1-1 capability, CALEA ("Communications Assistance for Law Enforcement Act") and wiretapping capabilities, as well as other homeland security and law enforcement requirements. In addition, being the code holder of a new NXX code will facilitate testing of routine but indispensable network functionalities for the provisioning of roaming, long distance, and virtually every conceivable mobile-to-land, mobile-to-mobile and land-to-mobile calling scenario. Once this extensive testing is complete and the switch is "live", Verizon Wireless will retain the designation of a single network test number for publication in the LERG Routing Guide, and will use the remaining 999 numbers for customer growth.

Verizon Wireless must be the code holder of a new NXX for testing purposes, but the Pooling Guidelines do not allow the PA to assign a thousands-block from a new NXX code for general testing purposes; the PA can only approve an application for a thousands-block from a new NXX code if the NXX code (assigned by the NANPA) is going to be used for location routing number (LRN) purposes, a dedicated customer, or if the pool needs to be replenished. Verizon Wireless does not meet these scenarios, but its need to be the code holder of a new NXX code is bona fide. Verizon Wireless will utilize a number from an existing NXX code in Bradenton to establish an LRN for the new switch once the switch is installed and that existing NXX code is migrated to it. Verizon Wireless cannot use numbers from that existing NXX code for testing the new switch because there are already live customers within the existing NXX code.

If this Commission grants Verizon Wireless' request that the Commission overturn the PA's decision to deny Verizon Wireless' request for a thousands-block from a new NXX code and the Commission authorizes the PA to assign to Verizon Wireless the requested thousands-block from a new NXX code, Verizon Wireless also requests that the Commission direct the PA to make the remaining nine thousands-blocks unavailable for assignment to other service providers until Verizon Wireless confirms to the PA that the switch installation is complete and the thousands-blocks are viable⁶. Such direction is necessary to prevent the PA from assigning one of those thousands-blocks to another service provider in the interim (prior to November 9, 2007), and Verizon Wireless wants to ensure that no service provider requests a thousands-block that won't be viable for several months during Verizon Wireless' new switch testing process, particularly when there are other viable thousands-blocks in the pool.

If this Commission grants Verizon Wireless' requests and Verizon Wireless is assigned the requested thousands-block from a new NXX code no later than July 25, 2007, the LERG effective date of the new NXX code and thousands-block should be near the end of September 2007. That will give Verizon Wireless only six weeks to complete testing before turn-up of the new switch on November 9, 2007. Verizon Wireless will notify the PA as soon as the switch installation is complete and the switch is "live" so that the PA can make the remaining nine thousands-blocks available for assignment. Verizon Wireless anticipates that it will be able to notify the PA no later than November 12, 2007 that such thousands-blocks can be made available for assignment.

Attachment 1 to this request contains confidential and proprietary business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, Verizon Wireless requests that the highlighted information contained in Attachment 1 is treated by the Commission as confidential and withheld from

Verizon Wireless waiver request for 1 block from new NXX code, 7.9.07

⁶ Per section 4.2.1 of the Pooling Guidelines, the code holder or "LERG Assignee" of an NXX code is responsible for default routing functions associated with a pooled NXX Code. Verizon Wireless cannot fulfill its LERG Assignee responsibilities for the remaining nine thousands-blocks until the switch is "live".

public inspection. In accordance with Rule 25-22.006, please find enclosed one copy of Attachment 1 with the confidential information highlighted, and two redacted copies.

For the above reasons, Verizon Wireless respectfully requests that the Commission:

- 1) Overturn the PA's denial of Verizon Wireless' application for a thousands-block from a new NXX code;
- 2) Authorize the PA to assign the requested thousands-block from a new NXX code so that Verizon Wireless may install of a new switch to meet growing customer demand; and
- 3) Direct the PA to make the remaining nine thousands-blocks from the new NXX code unavailable for assignment until Verizon Wireless notifies the PA that such thousands-blocks are viable.

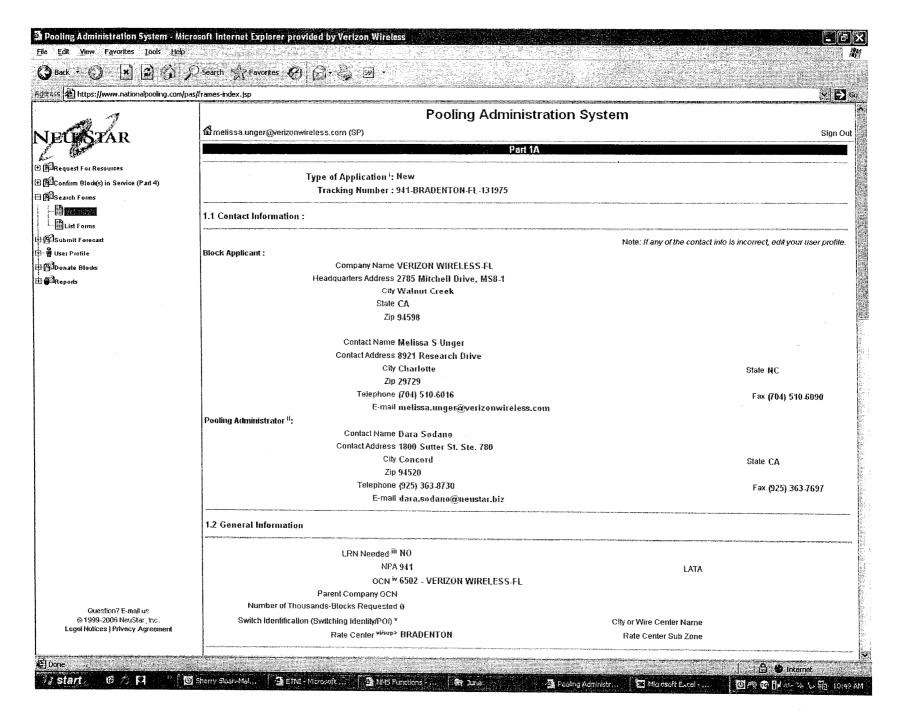
Should Verizon Wireless encounter any issues with its switch installation and turn-up that might delay the viability of the remaining thousands-blocks by November 12, Verizon Wireless will notify the PA immediately and provide a new expected viability date. In no instance though shall a revised date be pushed out beyond March 2008 when the NXX code and Verizon Wireless' thousands-block must be in service.

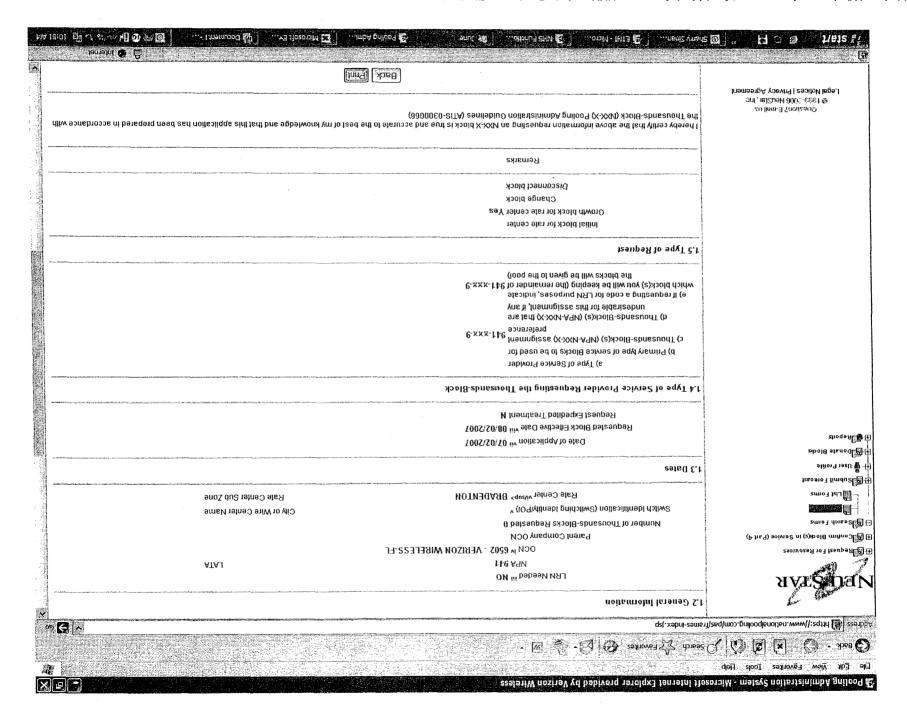
Thank you for you assistance in this matter. If you have any questions, please feel free to contact me at 682-831-3364.

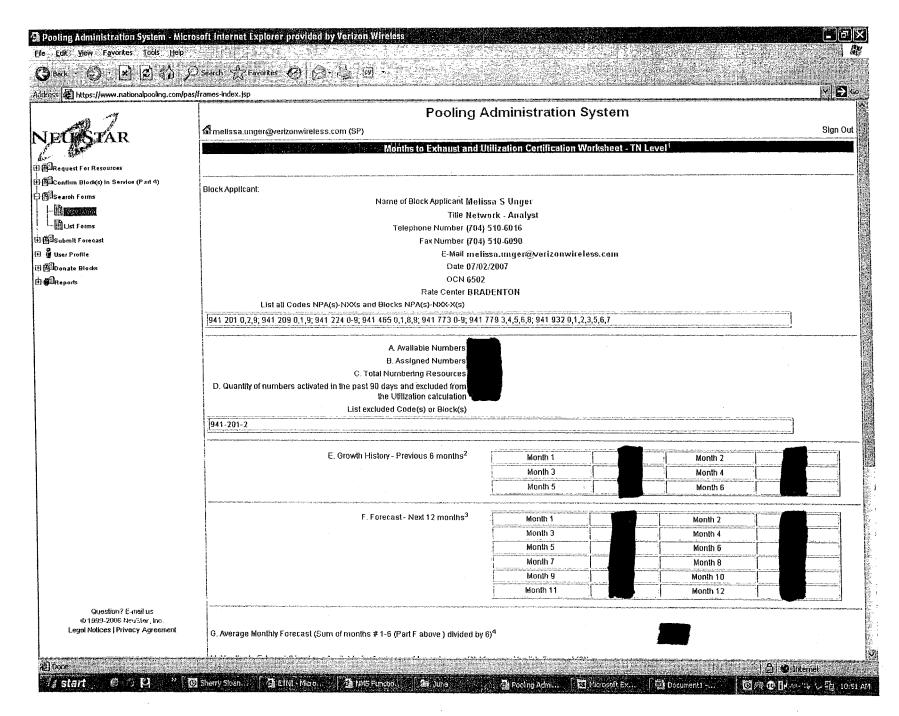
Sincerely,

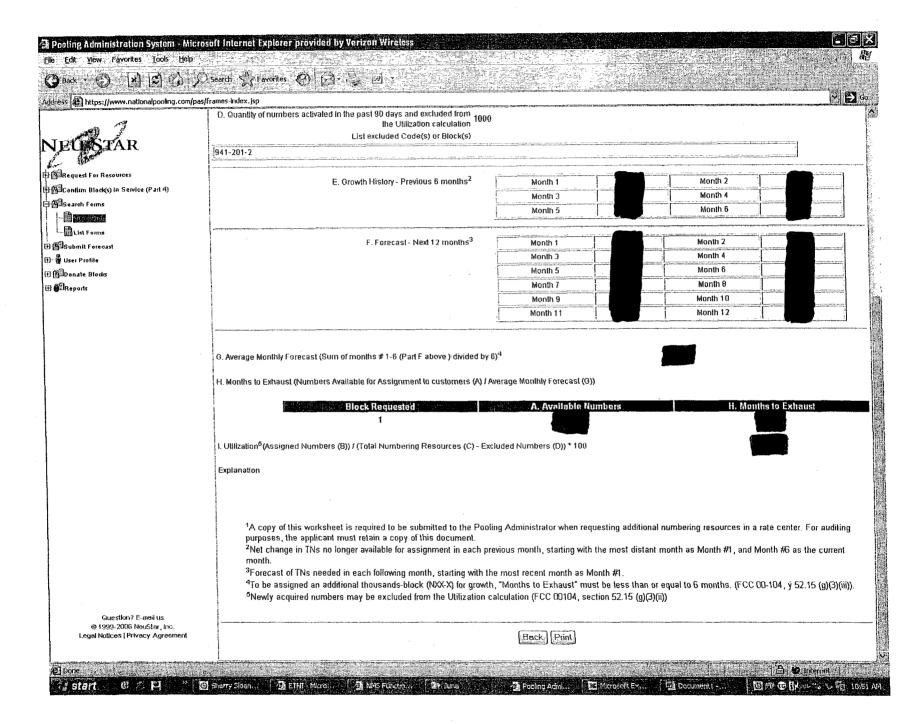
Dana Crandall Member of Technical Staff Numbering Policy & Standards

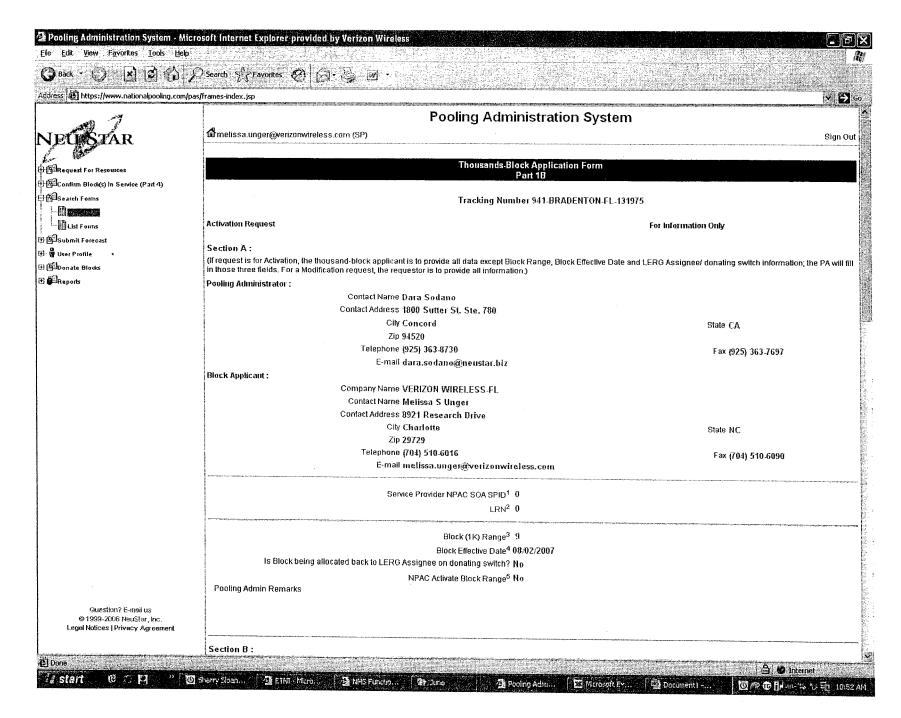
Attachments: 1 and 2

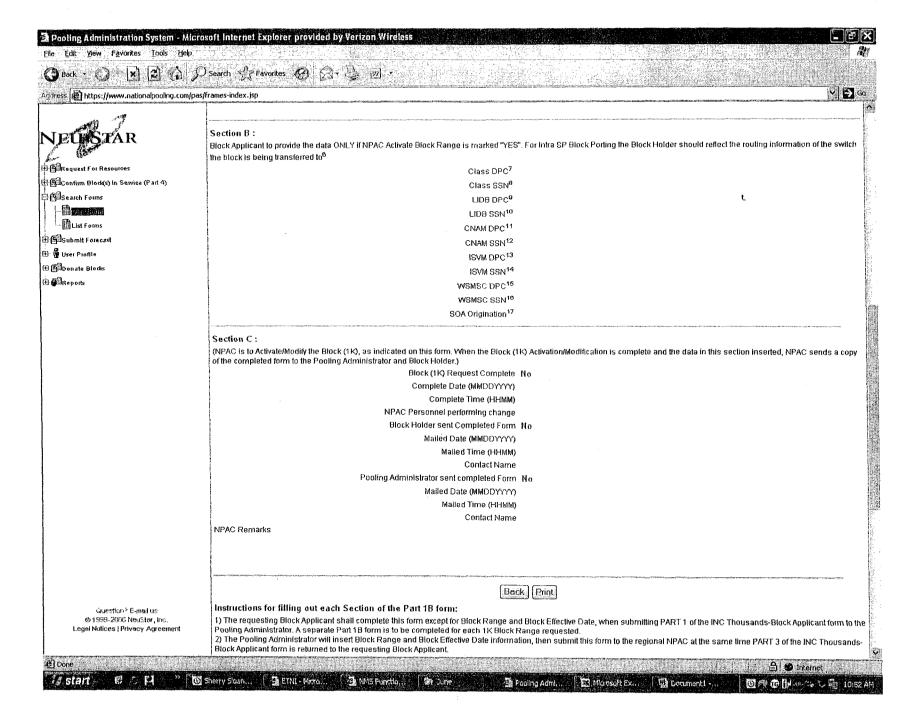












From: dara.sodano@neustar.biz [mailto:dara.sodano@neustar.biz]

Sent: Monday, July 02, 2007 2:32 PM **To:** Unger, Melissa; Unger, Melissa

Cc: PA_Part3@neustar.biz

Subject: Pooling Administrator's Response/Confirmation Part 3, 941-BRADENTON-FL-131975

NEUSTAR Pooling Administration System

Dated 02 July 2007

Pooling Administrator's Response/Confirmation Part 3

Tracking Number 941-BRADENTON-FL-131975

Date of Application 07/02/2007

Date of Receipt 07/02/2007

Block Effective Date
Date of Response 07/02/2007

Service Provider Name Verizon Wireless

(Telcordia $^{\text{TM}}$ LERG $^{\text{TM}}$ Routing Guide) OCN 6502-VERIZON WIRELESS-FL

NPAC SOA SPID 0

Pooling Administrator Contact Information:

Name Dara Sodano

Phone (925) 363-8730

E-Mail dara.sodano@neustar.biz

Fax (925) 363-7697

Response

NPA-NXX-X 0-0-0

Block Assigned
Block Disconnected

Block Contaminated (Yes or

No)

Block Allocation Date

Switch Identification

(Switching Entity / POI)¹

Rate Center BRADENTON

Rate Center Sub Zone

X Form Complete, block requested denied

Explanation:

DR-33: We are unable to process your application to replenish the pool. Records indicate there are enough resources in the current inventory to fulfill your need. 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.

Assignment activity suspended by the administrator

Explanation:

Further Action:

Remarks:

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

Pooling Administrator Dara Sodano 1800 Sutter St. Ste. 780 Concord, CA 94520 Phone: (925) 363-8730

Fax: (925) 363-7697

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: TO: FROM:	D. Blanton Radey Law tirm Ruth Nettles, Division of the Commission Clerk & Administrative Services
RE:	Acknowledgment of Receipt of Confidential Filing
No. 6	s will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket 70406 or (if filed in an undocketed matter) concerning Fachment 1 to Fling - Request for Waivern, and Denial. The will be maintained in locked storage.
Any 413-6770.	y questions regarding this matter should be directed to Marguerite Lockard at (850)

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CONFIDENTIAL

PSC/CCA019-C(Rev 12/06)

DOCUMENT NUMBER-DATE

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