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REDACTED ORIGINAL

070565-TL

August 15, 2007

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

RECEIVED-FPSC
07 AUG 15 PM 1:34
COMMISSION
CLERK

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Panama City Beach Exchange (Nautilus)

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Expedited Review of NXX-X Code Denial, which we ask that you file in the captioned *new* docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

- CMP** _____
- COM** _____
- CTR** cc: All Parties of Record
- ECR** _____ Jerry D. Hendrix
- ECR** _____ E. Earl Edenfield, Jr.
- GCL** _____ James Meza III
- OPC** _____
- RCA** _____
- SCR** _____
- SGA** _____
- SEC** _____
- OTH** _____

DOCUMENT NUMBER-DATE

07192 AUG 15 08

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code Denials
by the Number Pooling Administrator
for the Panama City Beach Exchange (Nautilus)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail this 15th day of August, 2007 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Thomas Foley
NPA Relief Planner
820 Riverbend Blvd.
Longwood, Florida 32779-2327
Tel. No.: (407) 389-8929
Fax. No.: (407) 682-1108
thomas.foley@neustar.com



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition for Expedited Review of Growth)
Code Denial by the North American Numbering)
Administrator for the Panama City Beach Exchange)
(Nautilus))
_____)

Docket No.

Filed: August 15, 2007

PETITION FOR EXPEDITED REVIEW OF NXX CODE DENIAL

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission (“FCC”) Order FCC 00-104, and Florida Public Service Commission (“Commission”) Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the North American Numbering Plan Administrator’s (“NANPA”) denial of AT&T Florida’s request for additional numbering resources in the Panama City Beach exchange. In support of this petition, AT&T Florida states:

PARTIES

1. AT&T Florida is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.

2. NANPA is an independent non-governmental entity, which is responsible for administering and managing numbering resources. See 47 C.F.R. § 52.13 (d).

JURISDICTION

3. The Commission has jurisdiction of this matter pursuant to Industry Numbering Committees (INC) NPA Code Relief Planning & Notification Guidelines Section 2.10 and Central Office Code (NXX) Assignment Guidelines Section 5.2. The

DOCUMENT NUMBER-DATE

07192 AUG 15 8

FPSC-COMMISSION CLERK

provisions provide that a carrier may challenge NANPA's decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. The Panama City Beach exchange consists of one (1) central office and one (1) switching entity that utilize numbering resources: Nautilus (PCBHFLNTDS0).

5. On July 25, 2007, AT&T Florida requested additional numbering resources from NANPA for the Panama City Beach (PCBHFLNTDS0) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to meet the request of a specific customer in a non-pooling exchange.

6. At the time of the code request, the Panama City Beach exchange had a MTE of 5.49 and a utilization of 65.7%.

7. On July 27, 2007, NANPA denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida is unable to provide the numbering resources requested by the specific customer. See Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the customer's contact information. See Attachment 2.

8. Both the FCC Order and the INC guidelines, referenced above, provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources.

9. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have a block of sequential numbers large enough to meet the

customer's specific request. Under existing procedures, NeuStar nor NANPA looks at the number of MTE and utilization for the entire rate center without exception. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

10. AT&T Florida requests that the Commission reverse NANPA's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NANPS's denial of numbering resources to AT&T Florida interferes with AT&T Florida's ability to serve its customers within the State of Florida.

(b) The MTE at the rate center level requirement is discriminatory against the incumbent LEC, since the ILEC is typically the only local service provider with multiple switches in a rate center. The ILEC deploys multiple switches in a rate center in order to meet customer demand for telephone service. The FCC's rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida believes that it is patently unfair to require that the ILEC only get six (6) MTE in all the switches it has deployed in a rate center, when the CLECs have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.

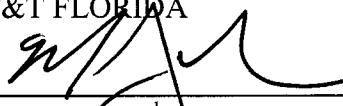
(c) As a result of NANPA's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers as required under Florida law.

WHEREFORE, AT&T Florida requests:

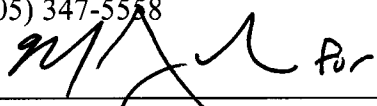
1. The Commission review the decision of NANPA to deny AT&T Florida's request for additional numbering resources for the Panama City Beach exchange; and
2. The Commission direct NANPA to provide the requested numbering resources for the Panama City Beach exchange as discussed above.

Respectfully submitted this 15th day of August, 2007.

AT&T FLORIDA



James Meza III¹
Manuel A. Gurdian
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558



E. Earl Edenfield, Jr.
AT&T Southeast
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763

687659

¹ The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

REDACTED

Attachment 1

Central Office Code (NXX) Assignment Request - Part 1

December 9, 2005

Tracking Number: 850-301739

Type of Application: New Change ¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Headquarters Address: [REDACTED]

City, State, Zip: [REDACTED]

Contact Name: [REDACTED]

Contact Address: [REDACTED]

City, State, Zip: [REDACTED]

Phone: [REDACTED] FAX: [REDACTED] E-mail: [REDACTED]

Code Administrator:²

Name: Michael Ortega

Address: 46000 Center oak Plaza,

City, State, Zip: Sterling, VA, 20166

Phone: 571-434-5348 FAX: 571-434-5502

1.2 NPA: 850 NXX: ³ LATA: 45009 OCN: ⁴ 9417 Parent Company's OCN(s) 9400

Switching Identification (Switch Entity/POI) ⁵ PCBHFLNTDS0

Locality/City/Wire Center: PNAMACYBCH

Homing Tandem Operating Co: ⁷ BST

Rate Center: ⁶ PNAMACYBCH

Tandem Homing CLLI: ⁸ PNCYFLMA04T

1.3 Dates: Date of Application: 07/25/2007 Request Effective Date: ⁹ 09/29/2007

Expedite Reason:

1.4 Type of company/entity requesting the code:

- a) RBOC (LEC, IC, CMRS, Other)
- b) Types of service: Wireline (e.g., Cellular - Type 2)
- c) Code Assignment Preference (Optional)
- d) Codes that are undesirable, if any 666, 800, 888, 900, 999
- e) Type of change (Mark **all** that apply)

OCN-Intra-company ¹¹ Switching Id Rate Center Tandem Homing CLLI

REDACTED

OCN-Inter-company¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes
 No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached X for BIRRDs ^{14 15}
Additional Documentation is attached _____ Additional Documentation is not attached X

Comments:

BellSouth does not pool in the Panama City Beach Rate Center. This code is a request for a Non-Pooled Dedicated code.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁶


Signature of Code Applicant

Code Administrator
Title

07/25/2007
Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademark of Telcordia Technologies, Inc.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

REDACTED

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵**WARNING!** It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶An incomplete form may result in delays in processing this request.

REDACTED

Effective June 11, 2001

Appendix B

CO CODE ASSIGNMENT MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹ (Worksheet to be used for Request for Additional Codes for Growth)

Date: 07/25/2007 Company Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Rate Center: PNAMACYBCH

NPA(s)-NXXs included in growth calculation²: 6

Signature of Authorized Representative of Code Applicant: [REDACTED]

Title: Code Administrator Telephone No.: [REDACTED] FAX No.: [REDACTED]

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): [REDACTED]

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

B. Previous 6-month growth history⁴: [REDACTED]

C. Forecast - Next months 1-12⁵: [REDACTED]

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): [REDACTED]

E. Months to Exhaust⁶ = $\frac{\text{Telephone Numbers (TNs) Available for Assignment (A)}}{\text{Average Monthly Forecast (D)}}$ = 5.49

F. Utilization Level⁷ = $\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's Inventory}} \times 100$ = 65.7

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

²Report on all resources for the requested geographic area, including newly acquired codes.

³Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴Net 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.

REDACTED

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁷Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, section 52.15 (g) (3) (ii)).

REDACTED

[REDACTED]

From: michael.ortega@neustar.biz
Sent: Friday, July 27, 2007 2:48 PM
To: [REDACTED]
Cc: part3@neustar.biz; michael.ortega@neustar.biz
Subject: Part 3 for tracking id:850-301739



NANP Administration System

Dated 27 July 2007

**Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request - Part 3 - ATIS-0300050.p3
Revised: February 9, 2004**

Administrator's Response/Confirmation Tracking Number: 850-301739

Date of Application: 07/25/2007 Date of RECEIPT: 07/25/2007
Date of Response: 07/27/2007 Effective Date: _____
Company/Entity Name: BELLSOUTH TELECOMM INC Service Provider OCN: 9417
DBA SOUTHERN BELL TEL & TEL
Contact Name: [REDACTED] Phone: [REDACTED]
Email: [REDACTED]@BellSouth.com
Fax: [REDACTED]

Code Administrator Contact Information:

Michael Ortega _____ Phone: 571-434-5348
Signature of Code Administrator
Michael Ortega _____ Fax: 571-434-5502
Name (print) Email: michael.ortega@neustar.biz

NPA: 850 **Code Assigned:** _____ **Date of NXX Code Assignment:** _____
Switch Identification(Switch Entity/POI): _____ Rate Center: PNAMACYBCH

Code Reserved: _____ **Date of Reservation:** _____
Your code Reservation will be honored until:
Switch Identification (Switch Entity/POI): _____

Form incomplete
Additional information required in the following sections(s)

Form Complete, code request denied.

6

Explanation: _____

Assignment activity suspended by the administrator.

Explanation: _____

Further Action: _____

NPA in jeopardy: Yes: No:

If yes, refer to the Section 9 of the assignment guidelines

Remarks:

According to the FCC 2nd Report and Order (FCC 00-429) effective June 30, 2003, in order to receive additional numbering resources, the MTE form you submit must meet the 75% utilization level. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.

A copy of this Part 3 has been sent to the following users/email addresses.

██████████@bellsouth.com	BellSouth
██████████@BellSouth.com	BellSouth Telecommunications

7

REDACTED

Customer Information

