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REDACTED

September 6, 2007

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

070 581-72

COMMISSION
CLERK

07 SEP - 6 PM 4: 25

RECEIVED-FPSC

Re: Petition for the Expedited Review of Growth Code Denials by the Number Pooling Administrator for the Daytona Beach Exchange (Main)

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 _____
- ECR _____
- GCL 2 _____
- OPC _____
- RGA _____
- SCR _____
- SGA _____
- SEC _____
- OTH Conf Records _____

cc: All Parties of Record
Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

DOCUMENT NUMBER-DATE

08103 SEP-6 6

FPSC-COMMISSION CLERK

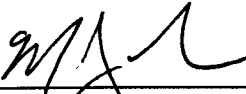
CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code Denials
by the Number Pooling Administrator
for the Daytona Beach Exchange (Main)

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

First Class U.S. Mail this 6th day of September, 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

In re: Petition for Expedited Review of Growth) Docket No.
Code Denials by the Number Pooling Administrator)
for the Daytona Beach exchange (Main)) Filed: September 6, 2007
_____)

PETITION FOR EXPEDITED REVIEW OF NXX-X 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 Pooling Administrator’s (“NeuStar”) denial of AT&T Florida’s request for additional numbering resources in the Daytona 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. NeuStar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources in pooling areas. See 47 C.F.R. § 52.20(d).

JURISDICTION

3. The Commission has jurisdiction of this matter pursuant to Industry Numbering Committees (INC) Number Pooling Guidelines Sections 3.7 and 12(c). This

provision provides that a carrier may challenge NeuStar's decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. The Daytona Beach exchange consists of five (5) central offices and five (5) switching entities that utilize numbering resources: Fentress (DYBHFLFNRS0), Main (DYBHFLMADS0), Ocean Shores (DYBHFLOSRS0), Ormand Beach (DYBHFLOBDS0) and Port Orange (DYBHFLPODS0).

5. On August 29, 2007, AT&T Florida requested additional numbering resources from NeuStar for the Daytona Beach Main (DYBHFLMADS0) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to meet the request of a specific customer.

6. At the time of the code request, the Daytona Beach exchange had a MTE of 20.36 and a utilization of 71.95%, while the Main (DYBHFLMADS0) switch had a MTE of 55.63.

7. On August 29, 2007, NeuStar's automated number request system 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 MTE and utilization rate for each switch in the Daytona Beach exchange and the customer's contact information. See Attachment 2.

8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar's

decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).

9. Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have 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 NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:

(a) NeuStar'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 NeuStar'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 NeuStar to deny AT&T Florida's request for additional numbering resources for the Daytona Beach exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Daytona Beach exchange as discussed above.

Respectfully submitted this 6th day of September, 2007.

AT&T FLORIDA



James Meza III¹
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AT&T Southeast
675 West Peachtree Street, Suite 4300
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(404) 335-0763

689764

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.

Pooling Administration System

Attachment 1

@bridge.bellsouth.com (SP)

Sign Out

REDACTED

Request Resources

State	FLORIDA
NPA	388
Rate Center	DAYTONABCH
OCN	9417-BELLSOUTH SO BELL
Type of Application	Application for a full NXX for a Dedicated Customer

Continue

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

@bridge.bellsouth.com (SP)

Sign Out

Request Full NXX (Dedicated Customer)

Do you already have a block/code in this rate center?
<input checked="" type="radio"/> Yes <input type="radio"/> No
Will all blocks be activated on the same switch?
<input type="radio"/> Yes <input checked="" type="radio"/> No
Will there be multiple block effective dates requested?
<input type="radio"/> Yes <input checked="" type="radio"/> No

Continue

Pooling Administration System

@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Wednesday, August 29, 2007

OCN 9417

Company Name **BELLSOUTH SO BELL**

Rate Center **DAYTONA BEACH**

REDACTED

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

386-226 0
386-226 1
386-226 2
386-226 3
386-226 4
386-226 5
386-226 6
386-226 7
386-226 8
386-226 9

Name of Block Applicant [REDACTED]
Title [REDACTED]
Telephone Number [REDACTED]
Fax Number [REDACTED]
E-Mail [REDACTED]@bellsouth.com

A. Available Numbers * [REDACTED]

B. Assigned Numbers * [REDACTED]

C. Total Numbering Resources * [REDACTED]

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * [REDACTED]

List excluded Code(s) or Block(s)

[REDACTED]

E. Growth History - Previous 6 months² *

Month 1	[REDACTED]	Month 2	[REDACTED]
Month 3	[REDACTED]	Month 4	[REDACTED]
Month 5	[REDACTED]	Month 6	[REDACTED]

F. Forecast - Next 12 months³ *

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

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

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1		20.359

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100

71.948

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.

²Net 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.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

Pooling Administration System

@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to 71.948 percent. The FCC requires a utilization of 75.000 percent.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Submit

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
December 9, 2005

REDACTED

Tracking Number: _____

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: BellSouth Telecommunications, Inc.
Headquarters Address: _____
City, State, Zip: _____
Contact Name: _____
Contact Address: _____
City, State, Zip: _____
Phone: _____ Fax: _____ E-Mail: _____@bellsouth.com

Code Administrator²:

Name: Michael Ortega
Address: 46000 Center Oak Plaza
City, State, Zip: Sterling, VA 20166
Phone: 571-434-5409 Fax: 571-434-6502

1.2 NPA: 386 NXX³: _____ LATA: 46601 OCN⁴: 9417 Parent Company's OCN(s): 9400
Switching Identification (Switching Entity/POI)⁵: DYBHFLMADS0
Locality/City/Wire Center: DAYTONA BEACH Rate Center⁶: DAYTONA BEACH
Homing Tandem Operating Co.⁷: BST Tandem Homing CLLI^{TM 8}: DYBHFLP001T

1.3 Dates: Date of Application: 08/14/2007 Requested Effective Date^{9 10}: ASAP

1.4 a). Type of company/entity requesting the code: LEC (LEC, IC, CMRS, Other)
b). Type of Service WIRELINE (e.g., Cellular – Type 2)
c). Code Assignment Preference (Optional) CUSTOMER REQUEST
d). Codes that are undesirable, if any _____
e). Type of Change (Mark all that apply):
 OCN: Intra-company¹¹ Switching Id Rate Center Tandem Homing CLLI
 OCN: Inter-company¹² Effective Date LATA Extend Reservation

1.5 Type of Request (Initial, Growth, etc.) GROWTH CODE

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.

Pool Indicator¹³: Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

REDACTED

**Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
December 9, 2005**

-
- ¹ Identify type and reason for change(s) in Section 1.4(e).
- ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- ³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
- ⁴ 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 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.
- ⁵ This 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 trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- TM Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.
- ⁸ This 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.
- ⁹ Code 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.
- ¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.
- ¹¹ Select if you are the current Code Holder
- ¹² Select if you are not the current Code Holder
- ¹³ The 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.
- ¹⁴ Applicant 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.
- ¹⁶ An incomplete form may result in delays in processing this request.

Daytona Beach
Utilization Summary
Report

Attachment 2

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Exchange	Central Office	Wire Center CLLI	Blocks	Avg Growth Per Month	Available TNs	MTE	Util
Daytona Beach	Fentress	DYBHFLFNRS0	9				
Daytona Beach	Main	DYBHFLMADS0	133				
Daytona Beach	Ocean Shores	DYBHFLOSRS0	11				
Daytona Beach	Ormond Beach	DYBHFLOBDS0	62				
Daytona Beach	Port Orange	DYBHFLPODS0	79				

Customer Contact Information

[REDACTED]