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### REDACTED

110249-TX

August 12, 2011

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

MECEIVED-FF3C

Re:

Petition for the Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Pierson Rate Center

(DYBHFLMAXHZ)

Dear Ms. Cole:

Enclosed is an original and seven copies of SBC Internet Services, Inc. d/b/a AT&T Internet Services' Petition for Expedited Review of Growth Code Denial, which we ask that you file in the captioned 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.

Sineerety,

Manuel A. Gurdian

cc: All Parties of Record Jerry D. Hendrix Gregory R. Follensbee Suzanne L. Montgomery

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**FPSC-COMMISSION CLERK** 

# CERTIFICATE OF SERVICE Petition for the Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Pierson Rate Center (DYBHFLMAXHZ)

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

First Class U.S. Mail this 12<sup>th</sup> day of August, 2011 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 Denial by the Number Pooling Administrator )

î,

For the Pierson Rate Center (DYBHFLMAXHZ)) Filed: August 12, 2011

### <u>PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL</u>

SBC Internet Services, Inc. d/b/a AT&T Internet Services<sup>1</sup> ("SBC"), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission ("FCC") Orders FCC 00-104 and 05-20, and Florida Public Service Commission ("Commission") Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the Number Pooling Administrator's ("NeuStar") denial of SBC's request for additional numbering resources in the Pierson rate center. In support of this petition, SBC states:

### **PARTIES**

- SBC is a foreign corporation authorized to do business 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.

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While SBC Internet Services is not a certificated LEC in the State of Florida, it is permitted to obtain numbering resources from the North American Numbering Plan Administrator and/or Pooling Administrator for use in deploying IP-enabled services, including Voice over Internet Protocol (VoIP) services, on a commercial basis to residential and business customers. See In the Matter of Administration of the North American Numbering Plan, Order, CC 99-200 (rel. Feb. 1, 2005).

### **BACKGROUND AND REQUEST FOR RELIEF**

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- 4. The Pierson rate center consists of two (2) switching entities that utilize numbering resources: Daytona Beach 1 (DYBHFLMAXHZ) and Daytona Beach 2 (DYBHFLMAX1Z).
- 5. On July 29, 2011, SBC requested numbering resources from NeuStar for the Pierson rate center. Specifically, SBC requested a full NXX to provide a Location Routing Number for a new VOIP switch (Daytona Beach 1 (DYBHFLMAXHZ)) in the Pierson rate center.
- 6. On April 19, 2011, SBC notified the Commission that it would be requesting numbers for this switch. See Attachment 1.
- 7. The company is requesting that the numbers be in the format of NPA-NXX-7. SBC will only use one block and return the other 9 blocks to the numbering pool.
- 8. On July 29, 2011, NeuStar denied SBC's request for additional numbering resources because SBC had not met the utilization based criteria. See Attachment 2.
- 9. At the time of the code request, the Pierson rate center had a MTE of 5.66 and a utilization of .1%. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the utilization information. See Attachment 3.
- 10. 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).

- 11. 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.
- 12. SBC requests that the Commission's reverse NeuStar's decision to withhold numbering resources from SBC on the following grounds:
- (a) NeuStar's denial of numbering resources to SBC interferes with SBC's ability to serve its customers within the State of Florida.
- (b) As a result of NeuStar's denial of SBC's request for additional numbering resources, SBC will be unable to implement IP-enabled services that interconnect to the PSTN.
- (c) Reversing the decision will enable SBC to deploy innovative new services and encourage the rapid deployment of new technologies and advanced services that benefit Florida consumers.

### WHEREFORE, SBC requests:

- 1. The Commission review the decision of NeuStar to deny SBC's request for additional numbering resources for the Pierson rate center; and
- The Commission direct NeuStar to provide the requested numbering resources for the Pierson rate center as discussed above.

### Respectfully submitted this 12th day of August, 2011.

SBC Internet Services d/b/a AT&T Internet Services

Tracy W. Hatch/ Manuel A. Gurdian

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

927877



Greg Follensbee Executive Director Regulatory Relations AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301 1561 T: 850.577.5555 F: 850.577-5537 greg.follensbee@att.com www.att.com

April 19, 2011

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

Re: SBC Internet Services, Inc. dba AT&T Internet Services request Numbering Resources Pursuant to Administration of the North American Numbering Plan, FCC Docket No. 99-200, Order, FCC 05-20 (released Feb. 1, 2005)

Dear Mrs. Cole:

Pursuant to the Federal Communications Commission's Docket No. 99-200, which is attached, SBC Internet Services, Inc. dba AT&T Internet Services (ATTIS) hereby notifies this Commission of its intent to request numbering resources for the rate centers listed in the attached Part 1 and/or Part 1A. Under that order, we are required to provide this Commission with this notice before obtaining numbering resources from the North American Numbering Plan Administrator and/or the Pooling Administrator. In addition to filing the attached information with this Commission, we are also submitting this information to the Federal Communications Commission.

If you have any questions please feel free to contact me.

Sincerely,

**Greg Follensbee** 

Executive Director, AT&T Florida

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cc:

Ms. Catherine Beard w/o attachments

Mr. Bob Casey w/o attachments

**Enclosure** 

DOCUMENT NUMBER-DATE

02655 APR 19 =

FPSC-COMMISSION CLERK

### Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	<b>)</b>	
Administration of the North American Numbering Plan	)	CC Docket 99-200
	,	

ORDER

Adopted: January 28, 2005

Released: February 1, 2005

By the Commission: Commissioners Abernathy, Copps, and Adelstein concurring and issuing separate statements.

#### I. INTRODUCTION

1. In this order, we grant SBC Internet Services, Inc. (SBCIS) a waiver of section 52.15(g)(2)(i) of the Commission's rules. Specifically, subject to the conditions set forth in this order, we grant SBCIS permission to obtain numbering resources directly from the North American Numbering Plan Administrator (NANPA) and/or the Pooling Administrator (PA) for use in deploying IP-enabled services, including Voice over Internet Protocol (VoIP) services, on a commercial basis to residential and business customers. We also request the North American Numbering Council (NANC) to review whether and how our numbering rules should be modified to allow IP-enabled service providers access to numbering resources in a manner consistent with our numbering optimization policies. The waiver will be in effect until the Commission adopts final numbering rules for IP-enabled services.

### 11. BACKGROUND

2. On May 28, 2004, SBCIS requested Special Temporary Authority (STA) to obtain numbering resources directly from the NANPA and/or the PA for a non-commercial trial of VoIP

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SBC IP Communications, Inc. (SBCIP) filed the petition in which it stated that it is an information service provider affiliate of SBC Communications, Inc. On January 27, 2005, SBC sent a letter to the Commission stating that SBCIP has been consolidated into another SBC affiliate, known as SBC Internet Services, Inc. (SBCIS), effective December 31, 2004. See Letter to Marlene H. Dortch, Secretary, Federal Communications Commission, from Jack Zinman, General Attorney. SBC Telecommunications, Inc. (January 25, 2005). Accordingly, in this Order we refer to SBCIS instead of SBCIP.

<sup>&</sup>lt;sup>2</sup> 47 C.F.R. § 52.15(g)(2)(i). Section 52.15(g)(2)(i) requires each applicant for North American Numbering Plan (NANP) resources to submit evidence that it is authorized to provide service in the area for which the numbering resources are being requested.

services.<sup>1</sup> On June 16, 2004, the Commission granted a STA to SBCIS to obtain up to ten 1,000 blocks directly from the PA for use in a limited, non-commercial trial of VoIP services.<sup>4</sup> On July 7, 2004, SBCIS requested a limited waiver of section 52.15(g)(2)(i) of our rules, which requires applicants for numbering resources to provide evidence that they are authorized to provide service in the area in which they are requesting numbering resources.<sup>5</sup> SBCIS's petition asserts that it intends to use the numbering resources to deploy IP-enabled services, including VoIP services, on a commercial basis to residential and susiness customers.<sup>6</sup> In addition, SBCIS limits its waiver request in duration until we adopt final numbering rules in the *IP-Enabled Services* proceeding.<sup>7</sup> SBCIS asserts that this limited waiver of our transportant rules will allow it to deploy innovative new services using a more efficient means of transportant to between IP networks and the Public Switched Telephone Network (PSTN).<sup>8</sup> Finally, SBCIS argues that granting the waiver will not prejudge the Commission's ability to craft rules in that proceeding.<sup>9</sup> The Commission released a Public Notice on July 16, 2004, seeking comment on this petition.<sup>10</sup> Several parties filed comments.<sup>11</sup>

3. The standard of review for waiver of the Commission's rules is well settled. The Commission may waive its rules when good cause is demonstrated. The Commission may exercise its Use relief to waive a rule where the particular facts make strict compliance inconsistent with the public of the object. In doing so, the Commission may take into account considerations of hardship, equity, or more

See Letter to William F. Maher, Jr., Chief, Wireline Competition Bureau, Federal Communications

\*\*Commission, from Gary Phillips, General Attorney & Assistant General Counsel, SBC Telecommunications, Inc.
(Nay 28, 2004) (Phillips Letter).

<sup>&</sup>lt;sup>4</sup> It the Matter of Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, 19 FCC Red 10708 (2004)(SBCIS STA Order).

See SBC IP Communications, Inc. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Sales Regarding Access to Numbering Resources, filed July 7, 2004 (SBCIS Petition).

<sup>&</sup>lt;sup>5</sup> See SBCIS Pelition at 1.

<sup>&</sup>lt;sup>7</sup> IP-Enabled Services, WC Docket No. 04-36, Notice of Proposed Rulemaking, 19 FCC Rcd 4863 (2004) (IP-Totaled Services NPRM). In the IP-Enabled Services NPRM, the Commission sought comment on whether any stating to numbering resources is desirable to facilitate or at least not impede the growth of IP-enabled services, while at the same time continuing to maximize the use and life of numbering resources in the North American Numbering Plan. IP-Enabled Services NPRM, 19 FCC Rcd at 4914.

<sup>.</sup> Id.

See SBCIS Petition at 2.

<sup>\*\*</sup> Comment Sought on SBC IP Communications, Inc. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Communication's Rules Regarding Access to Numbering Resources, Public Notice, CC Docket No. 99-200, 19 FCC Red 13158 (2004).

<sup>11</sup> See Appendix.

<sup>&</sup>lt;sup>12</sup> 47 C.F.R. § 1.3; see also WAIT Radio v. FCC, 418 F.2d 1153, 1159 (D.C. Cir. 1969), cert denied, 409 U.S. 1327 (1972) (WAIT Radio).

<sup>13</sup> Northeast Cellular Telephone Co. v. FCC, 897 F.2d 1164, 1166 (Northeast Cellular).

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effective implementation of overall policy on an individual basis.<sup>14</sup> Commission rules are presumed valid, however, and an applicant for waiver bears a heavy burden.<sup>15</sup> Waiver of the Commission's rules is therefore appropriate only if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.<sup>16</sup>

### III. DISCUSSION

- We find that special circumstances exist such that granting SBCIS's petition for waiver is in the public interest. Thus, we find that good cause exists to grant SBCIS a waiver of section 17 Tig (2)(i) of the Commission's rules until the Commission adopts numbering rules regarding IPenabled services.<sup>17</sup> Absent this waiver, SBCIS would have to partner with a local exchange carrier (LEC) to obtain North American Numbering Plan (NANP) telephone numbers. 18 Allowing SBCIS to directly numbers from the NANPA and the PA, subject to the conditions imposed in this order, will help repedite the implementation of IP-enabled services that interconnect to the PSTN; and enable SBCIS to deploy innovative new services and encourage the rapid deployment of new technologies and advanced pervices that benefit American consumers. Both of these results are in the public interest. 19 To further which that the public interest is protected, the waiver is limited by certain conditions. Specifically, we reaching SBCIS to comply with the Commission's other numbering utilization and optimization requirements, numbering authority delegated to the states, and industry guidelines and practices, 20 including filing the Numbering Resource Utilization and Forecast Report (NRUF).21 We further require "BCIS to file any requests for numbers with the Commission and the relevant state commission at least thirty days prior to requesting numbers from the NANPA or the PA. To the extent other entities seek similar relief we would grant such relief to an extent comparable to what we set forth in this Order.
- 5. Currently, in order to obtain NANP telephone numbers for assignment to its customers, SBCIS would have to purchase a retail product (such as a Primary Rate Interface Integrated Services Digital Network (PRI ISDN) line) from a LEC, and then use this product to interconnect with the PSTN in order to send and receive certain types of traffic between its network and the carrier networks. BBCIS seeks to applied a means to interconnect with the PSTN in a manner similar to a carrier, but without being

WAIT Radio, 418 F.2d at 1159; Northeast Cellular, 897 F.2d at 1166.

<sup>13</sup> WAIT Radio, 418 F.2d at 1157.

<sup>15</sup> Id. at 1159.

<sup>&</sup>lt;sup>17</sup> The Commission emphasizes that it is not deciding in this Order whether VoIP is an information service or a talegorous nucleations service.

<sup>18</sup> See SBCIS Petition at 3-5.

See iP-Enabled Services NPRM, 19 FCC Red at 4865 (recognizing the paramount importance of encouraging deployment of broadband infrastructure to the American people).

<sup>29</sup> See 47 C.F.R. Part 52.

See 47 C.F.R. § 52.15(f)(6)(requiring carriers to file NRUF reports).

<sup>22</sup> See SBCIS Petition at 2-3, PointOne Comments at 2-3.

<sup>23</sup> See SBCIS Petition at 3-5.

to interconnect with the PSTN on a trunk-side basis at a centralized switching location, such as an incumbent LEC tandem switch. SBCIS believes this type of interconnection arrangement will allow it to use its softswitch and gateways more efficiently to develop services that overcome the availability and scalability limitations inherent in retail interconnections with the PSTN.<sup>24</sup> SBCIS states that the requested waiver is necessary for it to be able to obtain its preferred form of interconnection.

- 6. Granting SBCIS direct access to telephone numbers is in the public interest because it will facilitate SBCIS' ability to efficiently interconnect to the PSTN, and thereby help to achieve the Commission's goals of fostering innovation and speeding the delivery of advanced services to consumers. As SBCIS notes in its petition, if it were to pursue this method of interconnection to the PSTN, it would be in a similar situation as commercial wireless carriers were when they sought to interconnect to the PSTN. Many of these wireless carriers did not own their own switches, and they had to rely on incumbent LECs (ILECs) to perform switching functions. Wireless carriers, therefore, had to interconnect with ILEC end offices to route traffic, in what is known as "Type 1" interconnection. Many wireless carriers subsequently sought a more efficient means of interconnection with the PSTN by purchasing their own switches, in what is known as "Type 2" interconnection. In reviewing the question of whether ILECs had to provide Type 2 interconnection to wireless carriers, the Commission recognized that greater efficiencies can be achieved by Type 2 interconnection. Granting this waiver in order to facilitate new interconnection arrangements is consistent with Commission precedent.
- 7. Although we grant SBCIS's waiver request, we are mindful that concerns have been raised with respect to whether enabling SBCIS to connect to its affiliate, SBC, in the manner described above, will disadvantage unaffiliated providers of IP-enabled voice services. Specifically, SBC recently filed an interstate access tariff with the Commission that would make available precisely the type of interconnection that SBCIS is seeking. WilTel Communications submitted an informal complaint to the Enforcement Bureau alleging that the tariff imposes rates that are unjust, unreasonable, and unreasonably discriminatory in violation of sections 201, 202, 251 and 252 of the Communications Act of 1934 and the corresponding Commission rules. In addition, ALTS submitted a request to the Wireline Competition Bureau that the Commission initiate an investigation of the tariff under section 205 of the Act because ALTS contends that the tariff is part of a strategy by SBC to impose access charges unlawfully on

<sup>24</sup> See SBCIS Petition at 5. See also PointOne Comments at 3.

<sup>25</sup> See SBCIS STA Order, 19 FCC Red at 10709.

<sup>26</sup> See SBCIS Petition at 3-4.

<sup>&</sup>lt;sup>27</sup> In the Matter of The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Declaratory Ruling, Report No. CL-379, 2 FCC Rcd 2910, 2913-2914 (1987).

<sup>2</sup>k ld.

<sup>&</sup>lt;sup>29</sup> Id.

<sup>&</sup>lt;sup>30</sup> Id.

<sup>&</sup>lt;sup>31</sup> We note that the tariff was filed on one days' notice, and therefore it is not "deemed lawful" under section 204(a)(3), nor has the Commission found it to be lawful.

<sup>&</sup>lt;sup>32</sup> See Letter from Adam Kupetsky, Director of Regulatory and Regulatory Counsel, WilTel Communications, to Radhika Karmarkar, Markets Disputes Resolution Division, Enforcement Bureau (Dec. 6, 2004).

unaffiliated providers of IP-enabled voice services.<sup>33</sup> Although the concerns raised about the lawfulness of SBC's tariff are serious, they do not provide a reason to delay action on a waiver that we otherwise find to be in the public interest. Rather, the appropriate forum for addressing such concerns is in the context of a section 205 investigation or a section 208 complaint.

- 8. Additional public interest concerns are also served by granting this waiver. The Commission has recognized the importance of encouraging deployment of broadband infrastructure to the American people.<sup>34</sup> The Commission has stated that the changes wrought by the rise of IP-enabled communications promise to be revolutionary.<sup>35</sup> The Commission has further stated that IP-enabled approaches have increased economic productivity and growth, and it has recognized that VoIP, in particular, will encourage consumers to demand more broadband connections, which will foster the development of more IP-enabled services.<sup>36</sup> Granting this waiver will spur the implementation of IP-enabled services and facilitate increased choices of services for American consumers.
- 9. Various commenters assert that SBCIS's waiver should be denied unless SBCIS meets a variety of Commission and state rules (e.g., facilities readiness requirements, ten digit dialing rules, ten digit dialing rules, and state rules (e.g., facilities readiness requirements, ten digit dialing rules, ten digit dialing rules, and state rules (e.g., facilities readiness requirements, ten digit dialing rules, ten digit dialing rules, and state numbering applicable interstate access charges, non-discrimination requirements, and state numbering requirements). We agree that it is in the public's interest to impose certain conditions. Accordingly, we impose the following conditions to meet the concern of commenters: SBCIS must comply with the Commission's numbering utilization and optimization requirements and industry guidelines and practices, including numbering authority delegated to mate commissions; and SBCIS must submit any requests for numbering resources to the Commission and the relevant state commission at least 30 days prior to requesting resources from the NANPA or the PA. These requirements are in the public interest, because they will help further the Commission's goal of ensuring that the limited numbering resources of the NANP are used efficiently. We do not find it necessary, however,

<sup>&</sup>lt;sup>33</sup> See Letter from Jason D. Oxman, General Counsel, ALTS, to Jeffrey Carlisle, Chief, Wireline Competition Eureau (Nov. 19, 2004).

<sup>34</sup> See IP-Enabled Services NPRM, 19 FCC Red at 4865.

<sup>3</sup>r Id. at 4867.

<sup>34 1</sup>d

<sup>37</sup> See AT&T Comments in Opposition at 5-6.

<sup>38</sup> See Ohio PUC Comments at 4-5, Michigan PUC Reply Comments at 6-7.

<sup>33</sup> See BellSouth Comments at 8.

<sup>40</sup> Id. at 8-9.

See Ohio PUC Comments at 8; Vonage Comments at 9.

<sup>42</sup> See California PUC Reply Comments at 5-6; Missouri PSC Reply Comments at 2.

<sup>&</sup>lt;sup>43</sup> See supro at para. 4. In its pleadings, SBCIS noted its willingness to comply with all federal and state numbering requirements. See SBCIS Reply Comments at 8-10; see also SBCIS Comments at 9-10.

<sup>&</sup>lt;sup>44</sup> Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, CC Docket 99-200, 15 FCC Red 7574, 7577 (2000).

to condition SBCIS' waiver on compliance with requirements other than numbering requirements. AS Requiring SBCIS to comply with numbering requirements will help alleviate concerns with numbering schaust. For example, the NRUF reporting requirement will allow the Commission to better monitor SBCIS' number utilization. Most VoIP providers' utilization information is embedded in the NRUF data of the LEC from whom it purchases a Primary Rate Interface (PRI) line. Also, SBCIS will be able to obtain blocks of 1,000 numbers in areas where there is pooling, as opposed to obtaining a block of 10,000 numbers as a LEC customer. Moreover, SBCIS will be responsible for processing port requests directly rather than going through a LEC. SBCIS' other obligations are not relevant to this waiver and will be addressed in the proceedings, including the *IP-Enabled Services* proceeding.

- Among the numbering requirements that we impose on SBCIS is the "facilities readiness" requirement set forth in section 52.15(g)(2)(ii). A number of parties have raised concerns about how 3BCIS will demonstrate that it complies with this requirement.46 In general, SBCIS should be able to satisfy this requirement using the same type of information submitted by other carriers. As noted by SPCIS, however, one piece of evidence typically provided by carriers is an interconnection agreement with the incumbent LEC that serves the geographic area in which the carrier proposes to operate. 47 For strates of demonstrating compliance with section 52.15(g)(2)(ii), if SBCIS is unable to provide a copy that it reconnection agreement approved by a state commission, we require that it submit evidence that it has ordered an interconnection service pursuant to a tariff that is generally available to other providers of IP-enabled voice services. The tariff must be in effect, and the service ordered, before SBCIS submits an application for numbering resources. SBCIS, however, may not rely on the tariff to meet the facilities residness requirement if the Commission initiates a section 205 investigation of the tariff. These requirements represent a reasonable mechanism by which SBCIS can demonstrate how it will connect its facilities to, and exchange traffic with, the public switched telephone network. This requirement also helps to address the concerns raised by Vonage regarding the potential for SBCIS to obtain discriminatory access to the network of its incumbent LEC affiliate.48
- Finally, a few commenters urge the Commission to address SBCIS's petition in the current Finally Services proceeding. We decline to defer consideration of SBCIS's waiver until final numbering rules are adopted in the IP-Enabled Services proceeding. The Commission has previously

<sup>\*</sup> See 47 C.F.R. Part 52.

<sup>46</sup> See AT&T Comments at 5-6; Vonage Comments at 6-7.

<sup>\*7</sup> See SBCIS Reply Comments at 11.

<sup>&</sup>lt;sup>48</sup> See Vonage Comments at 4. SBC recently filed a new interstate access tariff offering the form of tandem harronmection described by SBCIS in its waiver petition. WilTel Communications has filed an informal complaint against the tariff and ALTS has requested that the Commission initiate an investigation of that tariff pursuant to section 205. See supra para. 7. As noted above, either a section 205 investigation or a section 208 complaint is a better mechanism than this waiver proceeding for addressing discrimination concerns raised by the tariff. *Id.* We note that interested parties also have the option to oppose tariff filings at the time they are made or to file complaints after a tariff takes effect.

<sup>&</sup>lt;sup>49</sup> See AT&T Comments in Opposition at 4-5, Verizon Reply Comments at 1-2, California PUC Reply Comments at 7-9.

...

granted waivers of Commission rules pending the outcome of rulemaking proceedings,<sup>50</sup> and for the reasons articulated above, it is in the public interest to do so here. We also request the NANC to review whether and how our numbering rules should be modified to allow IP-enabled service providers access to numbering resources in a manner consistent with our numbering optimization policies. We grant this waiver until the Commission adopts final numbering rules regarding IP-enabled services. To the extent other entities seek similar relief we would grant such relief to an extent comparable to what we set forth in this Order.

### IV. ORDERING CLAUSE

12. IT IS ORDERED that, pursuant to sections 1, 3, 4, 201-205, 251, 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 153, 154, 201-205, 251, and 303(r), the Federal Communications Commission GRANTS a waiver to SBCIS to the extent set forth herein, of section 52.15(g)(2)(i) of the Commission's rules, until the Commission adopts final numbering rules regarding IP-enabled services.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch Secretary

See e.g., Pacific Telesis Petition for Exemption from Customer Proprietary Network Information Notification Requirements, Order, DA 96-1878 (rel. Nov. 13, 1996) (waiving annual Customer Proprietary Network Information (CPNI) notification requirements, pending Commission action on a CPNI rulemaking).

### APPENDIX

### Commenters

ATAT Corporation
BellSouth Corporation
Lowa Utilities Board
Mey York State Department of Public Service
Foregovania Public Utility Commission
Foregovania Public Utilities Commission of Ohio
Foregovania Corporation
Line Warner Telecom, Inc.
Vonage Holdings Corporation

### Resty Commenters

AT&T Corporation
California Public Utilities Commission
Includes Utility Regulatory Commission
John Staurulakis, Inc.
Maine Public Utilities Commission
Michigan Public Service Commission
Mational Association of Regulatory Utility Commissions
Fublic Service Commission of the State of Missouri
SBC IP Communications, Inc.
Seriet Corporation
Lange Holdings, Corporation

### CONCURRING STATEMENT OF COMMISSIONER KATHLEEN Q. ABERNATHY

Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

I support the Commission's decision to grant SBC IP Communications direct access to numbering resources, subject to the conditions set forth in this Order. I would have preferred, however, to grant such access by adopting a rule of general applicability, rather than by waiver. All of the arguments that justify allowing SBCIP to obtain numbers directly appear to apply with equal force to many other IP providers, suggesting that this decision will trigger a series of "me too" waiver petitions. Moreover, proceeding by rulemaking would have better enabled the Commission to address potential concerns associated with the direct allocation of numbers to IP providers. Particularly where, as here, the Commission already has sought public comment in a Notice of Proposed Rulemaking, I support adhering to the notice-and-comment rulemaking process established by the APA, rather than developing important policies through an ad hoc waiver process.

### CONCURRING STATEMENT OF COMMISSIONER MICHAEL J. COPPS

Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

Congress charged the Commission with the responsibility to make numbering resources available "on an equitable basis." Because numbers are a scarce public good, it is imperative that the Commission develop policies that ensure their efficient and fair distribution. I support today's decision because it is conditioned on SBC Internet Services complying with the Commission's numbering utilization and optimization requirements, numbering authority delegated to the states and industry guidelines and practices, including filing the Numbering Resource and Utilization Forecast Report. In addition, SBC Internet Services is required to file any requests for numbers with the Commission and relevant state commission in advance of requesting them from the North American Numbering Plan Administrator and/or Pooling Administrator.

I limit my support to concurring, however, because I think the approach the Commission takes here is less than optimal. Undoubtedly, SBC Internet Services is not the only provider of IP services interested in direct access to numbering resources. But our approach today neglects the need for broader reform that could accommodate other IP service providers. It puts this off for another day, preferring instead to address what may soon be a stream of wavier petitions on this subject.

While I am encouraged that the offices have agreed to refer these broader issues to the experts on the North American Numbering Council, I am disappointed that this did not occur well before today's item. Like so many other areas involving IP technology, this Commission is moving bit by bit through petitions without a comprehensive focus that will offer clarity for consumers, carriers and investors alike.

Finally, I think it is important to acknowledge that numbering conservation is not an issue that the federal government can undertake by itself. States have an integral role to play. This is why Congress specifically provided the Commission with authority to delegate jurisdiction over numbering administration to our state counterparts. Consumers everywhere are growing frustrated with the proliferation of new numbers and area codes. As IP services grow and multiply, state and federal authorities will have to redouble our efforts to work together. After all, we share the same goals—ensuring that consumers get the new services they desire and ensuring that numbering resources are distributed in the most efficient and equitable manner possible.

### CONCURRING STATEMENT OF COMMISSIONER JONATHAN S. ADELSTEIN

Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20

I support this decision to permit SBC to pursue innovative network interconnection arrangements through a limited and conditional waiver that grants SBC access to numbering resources for their IP-enabled services. In granting this relief, I note SBC's commitment to comply with Federal and State numbering utilization and optimization requirements. I am also pleased that this Order includes a referral to the North American Numbering Council for recommendations on whether and how the Commission should revise its rules more comprehensively in this area. While I support this conditional waiver, these issues would be more appropriately addressed in the context of the Commission's IP-Enabled Services rulemaking. Addressing this petition through the IP-Enabled Services rulemaking would allow the Commission to consider more comprehensively the number conservation, intercarrier compensation, universal service, and other issues raised by commenters in this waiver proceeding. It would also help address commenters' concerns that we are setting IP policy on a business plan-by-business plan basis rather than in a more holistic fashion.

Traci	king Number:				
Туре	of Application:	⊠New	☐Change <sup>1</sup>	☐ Delete	
1.0 G	ENERAL INFORM	RATION			
1.1 C	ontact Information:	:			
Code	Applicant:				
Com	pany/Entity Name:	SBC INTERNET	SERVICES, INC. d/b	a AT&T INTERNET	SERVICES
Head	quarters Address:	202 S. AKARD	STREET		
City,	State, Zip:	DALLAS, TEXA	S 75202		
Conta	act Name:	PATTY BERRIS			
Conta	act Address:	2600 CAMINO	RAMON, ROOM 2875	OMM	
City,	State, Zip:	SAN RAMON, O	A 94583		
Phon	e:	925-901-1934	Fax: 925-355-926	8 E-Mail: <u>pb</u>	1986@att.com
<u>Code</u>	Administrator <sup>2</sup> :				
Name	Ð:				
Addn	ess:				
City,	State, Zip:				
Phon	e:		_ Fax:		
1.2		NXX <sup>3</sup> :		*****	arent Company's OCN(s): 0555
	_		ntity/POI)5: ORLD		
	Locality/City/Wire		4.707		ORLANDO
	Homing Tandem	Operating Co.:	T&TA	Tandem Homing	CLLI <sup>TM 8</sup> : ORLDFLMA04T
1.3	<u>Dates:</u> Date of	Application:		Requested Effect	tive Date <sup>9 10</sup> :
	can grant. P request will Request Expedi	lease note that thi still be processed ted Treatment xpedite" = Yes	s only applies to a red in the order received.	uction in the Administ	st possible effective date the Administrator trator's processing time, however the on must be provided if
	Exherite Exhiai:	lauoii			
1.4	b). Type of Serv c). Code Assign	ment Preference (	Optional)	e (e.g., Cellular – T	(LEC, IC, CMRS, Other) Type 2)
		re undesirable, if a	·		
		nge (Mark <u>all</u> that a			_
		ra-company <sup>11</sup>   or-company <sup>12</sup>	Switching Id Effective Date	☐ Rate Center	<ul><li>☐ Tandem Homing CLLI</li><li>☐ Extend Reservation</li></ul>
					Page 1 of 27

Signa	ture of Code Applicant Title		Date	
PA	TTY BERRIS DAT	A ADMINISTRATOR	APRIL 18, 2011	
	pplication has been prepared in accordar web site (http://www.atis.org/inc/docs.as		e (NXX) Assignment Guidelines posted to the lon. <sup>14</sup>	
			d accurate to the best of my knowledge and the	at
Com	ments: Retain the "7" block out of the	ne code and donate remaining	"9" blocks to the NeuStar Number Pool.	
1.8		9	nation into BIRRDS. The 45-calendar day nput into BIRRDS has been completed.	
10	П			
1.7	Code request for new service (Explain)	: INITIAL LRN		
1.6	NPA Jeopardy Criteria Apply: 🗌 Yes	⊠ No		
	Pool Indicator <sup>13</sup> : ⊠ Yes			
	If an initial code, attach (1) evidence of growth code, attach months to exhaust	certification and (2) proof of ab worksheet.	ility to place code in service within 60 days. If	ia
1.5	Type of Request (Initial, Growth, etc.)	INITIAL	_	

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

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

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

different carrier.

The 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 CLLITM 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.

<sup>10</sup> 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.

<sup>14</sup> An incomplete form may result in delays in processing this request.

<sup>&</sup>lt;sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>&</sup>lt;sup>4</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 may contact NECA (800-228-8597) 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 M Routing Administration (TRA) on 732-699-

<sup>&</sup>lt;sup>5</sup> 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.)

<sup>&</sup>lt;sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a

Track	ing Number:				
Туре	of Application:	⊠New	☐Change <sup>1</sup>	Delete	
	ENERAL INFORM ontact Information:	ATION			
Code	Applicant:				
	any/Entity Name:	SBC INTERNET	SERVICES, INC. d/b/	a AT&T INTERNET	T SERVICES
•	quarters Address:	202 S. AKARD			
	State, Zip:	DALLAS, TEXA	S 75202		
•	ct Name:	PATTY BERRIS		<u> </u>	
Conta	ct Address:	2600 CAMINO F	RAMON, ROOM 28750	MM	
City, 5	State, Zip:	SAN RAMON, C			
Phone	<b>3</b> :	925-901-1934	Fax: 925-355-926	B E-Mail: pt	b1986@att.com
Code.	Administrator <sup>2</sup> :				
Name	:				
Addre	es:				
City, S	State, Zip:				
Phone	9:		Fax:		
1.2	Switching Identific	cation(Switching E		LMAXHZ	Parent Company's OCN(s): 0555
	Locality/City/Wire		ATOT	Rate Center <sup>6</sup> : Tandem Homing	
	Homing Tandem	Operating Co. :	AT&T		CLLI . DIBHPLFOOTI
1.3	Dates: Date of	Application:	<u>.</u>	Requested Effect	ctive Date <sup>9 10</sup> :
	can grant. Pl	ease note that this	cknowledge that I am r sonly applies to a redu in the order received.	equesting the earlie ction in the Adminis	est possible effective date the Administrator strator's processing time, however the
	Request Expedit "Request Ex	ed Treatment pedite" = Yes	Yes No Ex	pedite Documentati	ion must be provided if
	Expedite Explana	ation			
1.4	b). Type of Servi	any/entity requesti ce VOIP nent Preference (0		(e.g., Cellular – 1	(LEC, IC, CMRS, Other) Type 2)
	d). Codes that ar	e undesirable, if a	ny		
	e). Type of Chan	ge (Mark <u>all</u> that a	pply):		
	OCN: Intra		Switching Id Effective Date	☐ Rate Center ☐ LATA	☐ Tandem Horning CLLI ☐ Extend Reservation

Page 4 of 27

DOCUMENT NUMBER-DATE

02655 APR 19 =

FPSC-COMMISSION CLERK

Signature of Code Applicant		Title	Date
PA	ATTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011
this a	pplication has been prepared in a		and accurate to the best of my knowledge and that code (NXX) Assignment Guidelines posted to the cation. <sup>14</sup>
Com	ments: Retain the "7" block	out of the code and donate remain	ing "9" blocks to the NeuStar Number Pool.
1.8	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •	ormation into BIRRDS. The 45-calendar day il input into BIRRDS has been completed.
1.7	Code request for new service (	Explain): INITIAL LRN	
1.6	NPA Jeopardy Criteria Apply: [	]Yes ⊠ No	
	Pool Indicator <sup>13</sup> : ⊠ Yes	0	
	If an initial code, attach (1) evid growth code, attach months to		ability to place code in service within 60 days. If a
1.5	Type of Request (Initial, Growt	h, etc.) INITIAL	

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

The NXX field is required for any code request in which there is a change or the NXX is being returned. <sup>4</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 may contact NECA (800-228-8597) 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.

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a

different carrier.

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Track	dng Number:		<del></del>			
Туре	of Application:	⊠New	☐Change <sup>1</sup>	<b>□</b> Delete		
	ENERAL INFORM	ATION				
1.1 C	ontact Information:					
Code	Applicant:					
Comp	any/Entity Name:	SBC INTERNE	T SERVICES, INC. d/b	a AT&T INTERNET	SERVICES	
Head	quarters Address:	202 S. AKARD	STREET			
City, S	State, Zip:	DALLAS, TEX	AS 75202			
	ct Name:	PATTY BERRE	3			
Conta	ct Address:	2600 CAMINO	RAMON, ROOM 2875	DMM		
City, S	State, Zip:	SAN RAMON,	CA 94583			
Phone	<b>9</b> :	925-901-1934	Fax: 925-355-926	8 E-Mail: pb	1986@att.com	
Code	Administrator <sup>2</sup> :					
Name	<b>):</b>					
Addre	ess:				-	
City, S	State, Zip:					
Phone	<del>9</del> :		Fax:		·	
				4		
1.2	· · · · · · · · · · · · · · · · · · ·	NXX³:			arent Company's OCN(s):	
	Switching Identific	, ,	Entity/POI)*: MIAME	LACOMD	10111000	
	Locality/City/Wire		AYAT		HOLLYWOOD	
	Homing Tandem	Operating Co. :	AT&T	Tandem Homing	CLLI <sup>TM 5</sup> : NDADFLGG64T	
1.3	Dates: Date of A	Application:		Requested Effect	tive Date <sup>9 10</sup> :	
	can grant. Pl	ease note that th			st possible effective date the Administra trator's processing time, however the	itor
	Request Expeditus "Request Explana" Expedite Explana	pedite" = Yes	Yes No Ex	pedite Documentation	on must be provided if	
1.4	a). Type of compa b). Type of Servic c). Code Assignn	ce <u>VOIP</u> nent Preference (	Optional)	e (e.g., Celiular – T	(LEC, IC, CMRS, Other) Type 2)	
	d). Codes that an	-	·			
	e). Type of Chang	_				
	OCN: Intra		Switching Id Effective Date	Rate Center LATA	☐ Tandern Homing CLLI ☐ Extend Reservation	
				<del></del>		

Signature of Code Applicant		Title	Date	
PA	TTY BERRIS	DATA ADMINISTRATOR	APRIL 18, 2011	
this a	pplication has been prepared in		and accurate to the best of my knowledge and that ode (NXX) Assignment Guidelines posted to the cation. <sup>14</sup>	
Comr	ments: Retain the "7" block	out of the code and donate remain	ing "9" blocks to the NeuStar Number Pool.	
1.8			ermation into BIRRDS. The 45-calendar day il input into BIRRDS has been completed.	
1.7	Code request for new service	(Explain): INITIAL LRN REQUES	зт	
1.6	NPA Jeopardy Criteria Apply:	☐ Yes ⊠ No		
	Pool Indicator <sup>13</sup> :  Yes  I	ło		
	If an initial code, attach (1) ev growth code, attach months to	idence of certification and (2) proof of exhaust worksheet.	ability to place code in service within 60 days. If a	
1.5	Type of Request (Initial, Grow	th, etc.) [NITIAL	<del></del>	

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

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

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<sup>&</sup>lt;sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

Trac	king Number:				
Туре	of Application:	⊠New	☐Change <sup>1</sup>	☐ Delete	
1.0 G	ENERAL INFORM	ATION			
1. <b>1</b> C	contact Information:				
Code	Applicant:				
Com	pany/Entity Name:	SBC INTERN	ET SERVICES, INC. d/b	a AT&T INTERNET	SERVICES
Head	quarters Address:	202 S. AKARI	DSTREET		
City,	State, Zip:	DALLAS, TEX	(AS 75202	· ·	
Conta	act Name:	PATTY BERR	IIS		
Conta	act Address:	2600 CAMINO	RAMON, ROOM 2875	MM	
City,	State, Zip:	SAN RAMON	, CA 94583		
Phon	<del>18</del> :	925-901-1934	Fax: 925-355-926	B E-Mail: pb	1986@att.com
Code Name	Administrator <sup>2</sup> :				
Addre	BSS:				
City,	State, Zip:				
Phon	e:		Fax:		
1.2	NPA: 904 1 Switching Identific Locality/City/Wire		<u> </u>	LCL43Z	arent Company's OCN(s): 0555
	Homing Tandem		AT&T	Tandem Homing	
	, tolling Talluolli	opoleting co			
1.3	Dates: Date of	Application:		_ Requested Effect	tive Date <sup>8 10</sup> :
	can grant. Pl	ease note that t	acknowledge that I am r his only applies to a redu d in the order received.	equesting the earlies ection in the Administ	st possible effective date the Administrator trator's processing time, however the
	Request Expedite "Request Exp Expedite Explana	pedite" = Yes	Yes No Ex	pedite Documentatio	on must be provided if
1.4	a). Type of compa		sting the code: VOIF	<u> </u>	(LEC, IC, CMRS, Other)
b). Type of Servi			(Ontinnel)	(e.g., Celfular – T	ype 2)
	<ul><li>c). Code Assignn</li><li>d). Codes that an</li></ul>				
	e). Type of Chang				
	OCN: Intra		t apply): ☐ Switching Id	☐ Rate Center	Tandom Marias Old
	OCN: Inter		☐ Effective Date	LATA	☐ Tandem Homing CLLI ☐ Extend Reservation

Page 10 of 27

Signa	ture of C	code Applicant	Title	Date
PA	TTY BE	RRIS	DATA ADMINISTRATOR	APRIL 18, 2011
this a	pplicatio	n has been prepared in ac		and accurate to the best of my knowledge and that Code (NXX) Assignment Guidelines posted to the lication. <sup>14</sup>
Com	ments:	Retain the "7" block ou	t of the code and donate remai	ning "9" blocks to the NeuStar Number Pool.
1.8		• • • • • • • • • • • • • • • • • • • •	, , ,	formation into BIRRDS. The 45-calendar day til input into BIRRDS has been completed.
1.7	Code r	request for new service (E)	kplain): INITIAL LRN REQUE	ST
1.6	NPA J	eopardy Criteria Apply: 🔲	Yes 🖾 No	
	Pool in	dicator¹³: ⊠ Yes □ No		
		itial code, attach (1) evide code, attach months to ex		f ability to place code in service within 60 days. If a
1.5	Type o	of Request (Initial, Growth,	etc.) INITIAL	<u></u>

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

request from NANPA.

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<sup>&</sup>lt;sup>4</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 may contact NECA (800-228-8597) 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 TelcordiaTM Routing Administration (TRA) on 732-699-6700.

<sup>&</sup>lt;sup>5</sup> 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 To COMMON LANGUAGE CLLITM 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.)

Tracking Number: \_\_\_\_\_TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

Thous	sands-Block A <sub>l</sub> Part 1	oplication Form A	
Ivpe of Application (check one):	x New	Change	<u>Disconnect</u>
GENE	RAL APPLICATIO	N INFORMATION	
1.1 Contact Information:			
Block Applicant: Company Name: SBC INTERNET SE Headquarters Address: 208 S. AKAR Contact Name: PATTY BERRIS Contact Address 2600 CAMINO RAM Phone: 925-901-1934 Fax: 925-355-9 E-Mail: pb1986@att.com	DST. City DALLA  ION City SAN RA	<b>S</b> State <b>TX</b> Zip <b>75202</b>	
Pooling Administrator <sup>ii</sup> : Contact Name:			
Contact Address:	City	State	Zip
Phone: E-Mail:	Fax:		
NPA: 321 LATA 458 OCN <sup>N</sup> : 5166 Number of Thousands-Blocks Reques Switch Identification (Switching Entity/ Rate Center <sup>M</sup> : ORLANDO Rate Center  1.3 Dates	sted: <u>1</u> /POI) <sup>v</sup> : <b>ORLDFLM</b> /	478Z City or Wire Cent	er Name
Date of Application**:	Requested Blod Section 8.6) Yes	ck Effective Date <sup>viii</sup> :	<u>.</u>
By selecting this checkbox, I ackn Administrator can grant. Please no time, however the request will still	ote that this only ap	oplies to a reduction in th	
1.4 Type of Service Provider Reque	esting the Thousa	nds-Block:	
a) Type of Service Provider: <u>VOI</u> b) Primary type of service Blocks c) Thousands-Block(s) (NXX-X) d) Thousands-Block(s) (NXX-X) e) If requesting a code for LRN poleocks will be given to the poor	s to be used for: <u>VC</u> assignment prefer that are undesirab ourposes, indicate	<u>NP</u> rence (optional) le for this assignment, if	any e keeping (the remainder of the

Tracking Number: \_\_\_\_\_TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

1.5 Typ	pe of Request				
	Initial block for rate center: Yes X If Yes attach evidence of authorization and proof of capability to provide Service within 60 days				
Growth	n block for rate center: Yes _ 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	f Change (Mark <u>all</u> that apply):				
	OCN: Intra-company <sup>x</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					
b) c)	Is this block Contaminated: Yes or No If Yes how many TNs are NOT available for assignment: Have all new Intra SP ports been completed in the NPAC: Yes or No_ Has this block been protected from further assignment: Yes or No	<u></u>			
Disco	connect block: Yes, If Yes, list NPA-NXX-X				
Remarks: BLOCK for LRN.  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.					
	BERRIS DATA ADMINISTRATOR	APRIL 18, 2011			
Signatu	ture of Block Applicant Title	Date			

Tracking Number: \_\_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

#### 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandern and CLLI™ tandem of the facilities based provider. 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. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 unless they meet criteria outlined in section 9.1.2 of these Guidelines. 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.

Tracking Number: \_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

Thousands-Block Application Form Part 1A Change<sup>xii</sup> Type of Application (check one): Disconnect x New **GENERAL APPLICATION INFORMATION** 1.1 Contact Information: **Block Applicant:** Company Name: SBC INTERNET SERVICES, INC. d/b/a AT&T INTERNET SERVICES Headquarters Address: 208 S. AKARD ST. City DALLAS State TX Zip75202
Contact Name: PATTY BERRIS Contact Address 2600 CAMINO RAMON City SAN RAMON State CA Zip<u>94583</u> Phone: 925-901-1934 Fax: 925-355-9268 E-Mail: pb1986@att.com Pooling Administrator \*\*\*: Contact Name: Contact Address: State City Phone: Fax: E-Mail: 1.2 General Information Check one: No LRN needed \_\_ \_\_ LRN needed<sup>xiv</sup> X NPA: 386 LATA 456 OCN\*\*: 516C Parent Company's OCN 0555 Number of Thousands-Blocks Requested: 1 Switch Identification (Switching Entity/POI)\*\*: DYBHFLMAXHZ\_City or Wire Center Name\_ Rate Center wil: PIERSON Rate Center Sub Zone: 1.3 Dates Requested Block Effective Datexix: Request Expedited Treatment? (See Section 8.6) Yes\_ 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: VOIP (LEC, IXC, CMRS, Other) b) Primary type of service Blocks to be used for: VOIP c) Thousands-Block(s) (NXX-X) assignment preference (optional) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any

a) 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) 7

Tracking Number: \_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

1.5 Type of Request	
Initial block for rate center: Yes X If Yes attach evidence of authorization and proof of capability to provid Service within 60 days	le
Growth block for rate center: Yes _ 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 on the block effective date.	NPAC
Type of Change (Mark <u>all</u> that apply):	
☐ OCN: Intra-company <sup>xx</sup> ☐ Switching Id ☐ Part 1B ☐ OCN: Inter-company <sup>xx</sup> ☐ Effective Date	
Change block: Yes, If Yes, list NPA-NXX-X  1.6 Block Return	
a) Is this block Contaminated: Yes or 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 or No d) Has this block been protected from further assignment: Yes or No	
Disconnect block: Yes, If Yes, list NPA-NXX-X	
Remarks: BLOCK for LRN.  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.	
PATTY BERRIS DATA ADMINISTRATOR APRIL 18, 2011 Signature of Block Applicant Title Date	

Tracking Number: \_\_\_\_\_ TBPAG Attachment 1 ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

#### 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider. 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. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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.
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- 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 unless they meet criteria outlined in section 9.1.2 of these Guidelines. 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.

November 17, 2008

## Thousands-Block Application Form Part 1A

#### Footnotes:

'Identify the type of change(s) in Section 1.5.

<sup>&</sup>quot; The Pool Administrator is available to assist in completing these forms.

A CO Code application will also need to be submitted to the PA

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).

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 /PO1.

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)

prior to the effective date of the block(s).

Ex Select if you are the current Block Holder

<sup>\*</sup> Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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

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

xiv A CO Code application will also need to be submitted to the PA

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).

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 CLLT code of the switch /POI.

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.

and 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

xxi Select if you are not the current Block Holder

Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

November 17, 2008

		Inousan	Part 1A	oncation Form	1	
Type of	Application (check	one):		Change <sup>1</sup>	Disconne	<u>ct</u>
		GENERAL	APPLICATION	INFORMATION		
1.1 Con	tact information:					
Block A						
Company	Name: SBC INTER	<u>NET SERVI</u>	CES. INC. d/b/a	AT&T INTERNE	T SERVICES	
	rters Address: 208 8		City DALLAS	State <u>TX</u> Zip <u>7</u>	<u>5202</u>	
	Name: PATTY BERF					
Contact /	ddress 2600 CAMII	NO RAMON	City SAN RAM	ON State CA	Zip <u>94583</u>	
	25-901-1934 Fax: 92	<u>(3-333-9268</u>				
E-Man. P	b1986@att.com					
Pooling	Administrator <sup>ii</sup> :					
	Name:					
Contact /	Address:					
			City	State	Zip_	
Phone: _			Fax:			
E-Mail: _						
Number o	4_LATA_460_OC of Thousands-Blocks entification (Switchin iter <sup>4</sup> : HOLLYWOOD	Requested: g Entity/POI	1 ) <sup>Y</sup> : <u>MIAMFLACQ</u>	MD City or Wire	Center Name	
Date of A Request	pplication <sup>vil</sup> : Expedited Treatment	? (See Sect	Requested Block ion 8.6) Yes _	Effective Date <sup>viii</sup> :		_
Admi	electing this checkboomistrator can grant. F however the request	Please note t	hat this only app	lies to a reduction		
1.4 Type	of Service Provide	r Requestin	g the Thousand	ls-Block:		
b) F c) T d) T e) H	ype of Service Provi Primary type of servic Primary type of servic Primary type of service Proussing a code for Procks will be given to	e Blocks to I (NXX-X) ass (NXX-X) that or LRN purpo	be used for: <u>VOII</u> ignment preferent tare undesirable oses, indicate wh	ece (optional) for this assignment		remainder of the

November 17, 2008

## Thousands-Block Application Form Part 1A

1.5 Type of Request
Initial block for rate center: Yes $\underline{\mathbf{X}}$ If Yes attach evidence of authorization and proof of capability to provide Service within 60 days
Growth block for rate center: Yes _ 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 <u>all</u> that apply):
☐ OCN: Intra-company <sup>x</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 or 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 or No d) Has this block been protected from further assignment: Yes or No
Disconnect block: Yes, If Yes, list NPA-NXX-X
Remarks: BLOCK for LRN.  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) Poolin 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.
PATTY BERRIS DATA ADMINISTRATOR APRIL 18, 2011 Signature of Block Applicant Title Date

November 17, 2008

### Thousands-Block Application Form Part 1A

### 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.
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The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

November 17, 2008

### **Thousands-Block Application Form** Part 1A

### Footnotes:

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

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

iii A 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).

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™ code of the switch /POI.

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).

\*\* Select if you are the current Block Holder

<sup>\*</sup> Select if you are <u>not</u> the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

November 17, 2008

Thousar	nds-Block Appi Part 1A	ication Form	
Type of Application (check one):		Change <sup>l</sup>	Disconnect
GENERA	L APPLICATION I	NFORMATION	
1.1 Contact Information:			
Block Applicant: Company Name: SBC INTERNET SERV Headquarters Address: 208 S. AKARD S Contact Name: PATTY BERRIS Contact Address 2600 CAMINO RAMON Phone: 925-901-1934 Fax: 925-355-926 E-Mail: pb1986@att.com	ST. City DALLAS S City SAN RAMO	State TX Zip75202	RVICES 94583
Pooling Administrator <sup>II</sup> : Contact Name:			
Contact Address:		Ctata	
Phone:	_City _Fax:	State	ZIP
E-Mail:			
1.2 General Information			
Check one: No LRN needed LR	RN needed <sup>ili</sup> X		
NPA: <u>904</u> LATA <u>45204</u> OCN <sup>N</sup> : <u>516C</u> Number of Thousands-Blocks Requested	Parent Company	's OCN <u>0555</u>	
Switch Identification (Switching Entity/PC Rate Center*: MIDDLEBURG_Rate Center*	DI) <sup>v</sup> : <u>JCVLFLCL432</u> ter Sub Zone:	City or Wire Center	Name
1.3 Dates			
Date of Application <sup>vil</sup> :	Requested Block I	Effective Date <sup>viii</sup> :	
By selecting this checkbox, I acknow Administrator can grant. Please note time, however the request will still be	ledge that I am req that this only appli	uesting the earliest pes to a reduction in the	
1.4 Type of Service Provider Requesti	ng the Thousand:	s-Block:	
<ul> <li>a) Type of Service Provider: <u>VOIP</u> (</li> <li>b) Primary type of service Blocks to</li> <li>c) Thousands-Block(s) (NXX-X) as</li> <li>d) Thousands-Block(s) (NXX-X) the</li> <li>e) If requesting a code for LRN purpolocks will be given to the pool)</li> </ul>	be used for: <u>VOIP</u> signment preferent at are undestrable boses, indicate whi	ce (optional) for this assignment, It	fany

November 17, 2008

## Thousands-Block Application Form Part 1A

5 Type of Request
itial block for rate center: Yes $\underline{X}$ If Yes attach evidence of authorization and proof of capability to provide ervice within 60 days
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By selecting this checkbox, I ecknowledge 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.
ype of Change (Mark <u>all</u> that apply):
☐ OCN: Intra-company <sup>lx</sup> ☐ Switching Id ☐ Part 1B ☐ OCN: Inter-company <sup>x</sup> ☐ Effective Date
hange block: Yes, If Yes, list NPA-NXX-X
a) Is this block Contaminated: Yes or 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 or No d) Has this block been protected from further assignment: Yes or No
Disconnect block: Yes, If Yes, list NPA-NXX-X
emarks: <u>BLOCK for LRN.</u> nereby certify that the above information requesting an NXX-X block is true and accurate to the best of my nowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling dministration Guidelines ATIS-0300066 available on the ATIS web site (www.atis.org/inc) or by contacting c@atis.org as of the date of this application.
ATTY BERRIS DATA ADMINISTRATOR APRIL 18, 2011
lignature of Block Applicant Title Date

November 17, 2008

## Thousands-Block Application Form Part 1A

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The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

November 17, 2008

## Thousands-Block Application Form Part 1A

### Footnotes:

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

<sup>&</sup>quot;The Pool Administrator is available to assist in completing these forms.

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Nate 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.

wii 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).

prior to the effective date of the block(s).

ix Select if you are the current Block Holder

<sup>\*</sup> Select if you are <u>not</u> the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

...

# Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

Traci	king Number:	386-PIERSON-F	L-462531		REDACTED
Туре	of Application:	⊠New	☐Change <sup>1</sup>	Delete	
	ENERAL INFORM ontact Information:				
Code	Applicant:				•
Comp	pany/Entity Name:	SBC INTERNE	T SERVICES, INC.		
Head	quarters Address:			· .	
City,	State, Zip:				
Conta	act Name:				
Conta	act Address:				
City,	State, Zip:			·	
Phon	e:		Fax:	B E-Mail:	@att.com
Code	Administrator2:				
Name	e:	MICHAEL OR	TEGA		·
Addre	ess:	46000 CENTE	R OAK PLAZA		
City,	State, Zip:	STERLING, V	20166		
Phon	e:	925-901-1934	Fax: 925-355-926	8	•
1.2	NPA: 386 Switching Identifi Locality/City/Wire Homing Tandem	Center:		LMAXHZ	PIERSON  CLLI <sup>TM 8</sup> : DYBHFLPO01T
1.3	_		7/29/2011	Requested Effect	
	can grant. P	lease note that th			est possible effective date the Administrator's processing time, however the
	Request Expedit "Request Ex	ted Treatment pedite" = Yes	Yes No Ex	cpedite Documentati	on must be provided if
	Expedite Explan	ation REC	UIRE EXPEDITE TO I	MEET PROJECT TA	ARGETED DATE.
1.4	a). Type of comp b). Type of Servi c). Code Assignr	ice Other ment Preference	(Optional)	e over Internet Proto (e.g., Cellular –	
	d). Codes that a		·		
	e). Type of Char	· · -	apply):  Switching Id  Effective Date	☐ Rate Center	☐ Tandem Homing CLLI ☐ Extend Reservation

## Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1) July 19, 2010

REDACTLL

1.5	Type of	Request (Initial, Growth, etc.)	Growth	•
		tial code, attach (1) evidence owth code, attach months to ex	of certification and (2) proof of ability to place con haust worksheet.	de in service within 60 days.
	Pool In	dicator¹³: ⊠ Yes ☐ No		
1.6	NPA Je	opardy Criteria Apply: 🗌 Yes	□No	
1.7	Code re	equest for new service (Explai	n): REQUIRE LRN TO SUPPORT NETWO	RK PLANS
1.8				
			y to arrange input of Part 2 information into BIRF for BIRRDS will not begin until input into BIRRE	
Comm	ents:	RETAIN ONLY THE '7' BLO NUMBER POOL.	CK OUT OF CODE AND DONATE REMAINING	BLOCKS TO THE
that thi	is applic	ation has been prepared in ac	questing an NXX code is true and accurate to the cordance with the Central Office Code (NXX) As incquides.asp) as of the date of this application.	signment Guidelines posted
		SR.	. SPECIALIST- NETWORK PLANNING ENGR	07/29/2011
Signat	ure of C	ode Applicant Titl	9	Date

### Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request - Part 1 (ATIS-0300050.p1) July 19, 2010

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<sup>&</sup>lt;sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>&</sup>lt;sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>&</sup>lt;sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>&</sup>lt;sup>4</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 may contact NECA(800-228-8597) 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<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>&</sup>lt;sup>5</sup> 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.)

<sup>&</sup>lt;sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>&</sup>lt;sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI'M Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2. <sup>9</sup> 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.

<sup>10</sup> Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> 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 An incomplete form may result in delays in processing this request.

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<b>Tracking</b>	Number:	

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

	Fallin	•	
Type of Application (check one):	√ New	□ Change <sup>i</sup>	□ Disconnect
GENER	RAL APPLICATION	NINFORMATION	
1.1 Contact Information:			
Block Applicant:		,	
Company Name: SBCIS/ATTIS			
Headquarters Address:	City:	_StateCA_	Zip94583
Contact Name:			
Contact Address:	City:	StateCA	Zip94583
Phone:	Fax:_		
E-Mail @att.com			
Pooling Administrator <sup>ii</sup> :			
Contact Name: DARA SODANO			
Contact Address: 1800 SUTTER ST SUIT	TE 780, CONCORD,	CA 94520	
Phone: 925-363-8730	Fax:	925-363-7692	
E-Mail: <u>dara,sodano@neustar.biz</u>			
Check one: No LRN needed  NPA: 386 LATA: 45601  Number of Thousands-Blocks Requested:  Switch Identification (Switching Entity/PCRate Center*: PIERSON Rate Center S	_OCN <sup>iv</sup> : _516C 1 OI) <sup>v</sup> : DYBHFLMAX	Parent Company's C	
1.3 Dates			
Date of Application vii: 07/29/2011	Remester	l Block Effective Date <sup>vii</sup>	i. 10/14/11
Request Expedited Treatment? (See Section	on 8.6) Yes X	No.	
a) Type of Service Provider Requestin  a) Type of Service Provider: _VoIP_ b) Primary type of service Blocks to b c) Thousands-Block(s) (NXX-X) assi d) Thousands-Block(s) (NXX-X) that e) If requesting a code for LRN purpo	be used for: Other ignment preference (of the tare undesirable for the	cr(LEC optional)this assignment, if any _	
be given to the pool)		Mook(a) you will be keel	THE CHIC LOTHERINGS OF THE DIOCKS WITH

## **REDACTED**

Tm	akina	Numbe	>r'
ıra	ckına	Numbe	3r:

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

Thousands-Block Application Form Part 1A
1.5 Type of Request
Initial block for rate center: No_X, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days
Growth block for rate center: YesX, If Yes, attach months to exhaust worksheet
Change block: No, If Yes, indicate NPA-NXX-X, type of and reason for change:
Disconnect block: No, 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 Guideline ATIS-0300066.
SIGNATURE ON FILE) SR. SPECIALIST- NETWORK PLANNING ENGR 07/29/2011 Signature of Block Applicant Title

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BPAG Attachment 1 – March 19, 2007

ATIS-0300066.at1

Tracking Number:

### Thousands-Block Application Form Part 1A

### Instructions for filling out each Section of the Part 1A form:

- 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a fourcharacter alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI<sup>™</sup> tandem of the facilities based provider ix. 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.
- Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousandsblock, 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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

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	NIII IMM MAP	
Tracking	MUMBEL.	

TBPAG Attachment 1 - March 19, 2007 ATIS-0300066.at1

### **Thousands-Block Application Form** Part 1A

Foot Notes:

i Identify type of and reason for change(s) in Section 1.5.

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

iii A CO Code application will also need to be submitted to the PA

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).

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 CLLITM code of the switch /POI.

Rate Center name must be a tariffed Rate Center.

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).

\*\* Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

### Appendix 3 - Modified August 6, 2001

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level <sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

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	Dat	e <u>: 07/29/11 OCN: 516C Company Name: SBCIS/ATTIS</u>	, ,
	Rat	e Center: PIERSON	
	List	all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX (0), NXX-X(1)	
	Nar	ne of Block Applicant: Signature: ON FILE	
	Title E-M	e: DATA ADMINISTRATOR Telephone No.: FAX No.:	
	Α.	Available Numbers: 944	
	В. /	Assigned Numbers: 1	
	C.	Total Numbering Resources: 1000	
	D.	Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0List excluded Code(s) or Block(s):	
∞	E.	Growth History - Previous 6 Month Mo	
	G.	Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6)	
	Н.	Months to Exhaust <sup>4</sup> Numbers Available for Assignment to Customers (A)  Average Monthly Forecast (G)	
	l.	Utilization 5  Assigned Numbers (B) - Excluded Numbers (D)  Total Numbering Resources (C) - Excluded Numbers (D)  * 100 =  Total Numbering Resources (C) - Excluded Numbers (D)	
	Ехр	lanation:	.,
	_		
	_		

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

<sup>4</sup> To 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)).

<sup>&</sup>lt;sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

From: Sent: To: Cc: Subject:	Friday, July 2 PA_Part3@n	g Administrator's I		(ATTSI);	Tracking Number: 38	(ATTSI); 86-PIERSON-
Pool	ing Administration	n System				
Dated 29-	July-2011					
	November 21, 2003 ATIS-0300066.at3				Attachment	3
	•	Pooling Administrate TBF	or's Respon PAG Part 3			
	Tracking Number:	386-PIERSON- 462531	FL-			
	Date of Application:	07/29/2011	E	ffective Date:	•	
	Date of Receipt:	07/29/2011	D	ate of Response:	07/29/2011	•
	Service Provider Name:	SBC INTERNE	T SERVIC	ES. INC.		
	(Telcordia TM LERG TM Routing Guide ) OCN:	516C				•
	NPAC SOA SPID :				<del></del>	
	Pooling Administrator Contact Information:  Dara Flowers		_ Phone:		925-363-8730	
	Signature of Pooling Admini	strator		•	<del></del>	
	Dara Flowers		_ Fax:	•	925-363-7697	_
	Name (print) Email:		dara fio	wers@neustar.biz		
			Gargano			
	NPA-NXX or NPA- NXX-X :			Block Assigned		_
			Block Reserved:  Block Reservation Expiration Date:			

Block/Code Disconnected:

	Block Contaminated(Yes or No):  If Yes,enter the number of TNs contaminated:						
	Switch Identification(Switch Entity/POI): 1	DYBHFLMAXHZ					
	Rate Center:	PIERSON					
	Rate Center Sub Zone:	<u> </u>					
<u>x</u>	Form Complete, request denied.						
	Explanation:	•					
	DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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 the administration:	itor.					
Rem	arks:						

### neustar.

<sup>&</sup>lt;sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)

Pierson (ATIS) Utilization Summary Report

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Exchange	Central Office	Wire Center CLLI	Blocks	Avg Growth Per Month	Available TNs	MTE	Utilization
PIERSON	Daytona Beach 2	DYBHFLMAXIZ	1				