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REDACTED

May 15, 2012

COMMISSION CLERK 12 MAY 15 PM 4: 31

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

Re:

Docket No. 120156-TL

Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Miami Exchange

(Bayshore)

Dear Ms. Cole:

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

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

Sincerely,

Suzanne L. Montgomery

cc: All Parties of Record Joe S. York Gregory R. Follensbee

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CERTIFICATE OF SERVICE

Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Miami exchange (Bayshore)

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

First Class U.S. Mail this 15th day of May, 2012 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

Suzanne L. Montgomery

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator)	Docket No. 120156-TL
for the Miami exchange (Bayshore))	Filed: May 15, 2012

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida"), pursuant to 47 C.F.R. § 52.15(g)(iv), Federal Communications Commission ("FCC") Order FCC 00-104, and Florida Public Service Commission ("Commission") Order No. PSC-01-1873-PCO-TL, petitions the Commission to review the denial by NeuStar, Inc. acting as the Pooling Administrator ("NeuStar") of AT&T Florida's request for additional numbering resources in the Miami exchange. In support of this petition, AT&T Florida states:

PARTIES

- 1. AT&T Florida is a limited liability company organized and formed under the laws of the State of Georgia and an incumbent local exchange company ("ILEC") authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.
- 2. NeuStar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources in pooling areas. *See* 47 C.F.R. § 52.20(d).

JURISDICTION

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

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

BACKGROUND AND REQUEST FOR RELIEF

- 4. The Miami exchange consists of twenty four (24) central offices and twenty eight (28) switching entities that utilize numbering resources: Airport (MIAMFLAPDS0), Alhambra (MIAMFLAEDS0 and MIAMFLAERS0), Allapattah (MIAMFLALDS0), Bayshore (MIAMFLBA85E), Beach (MIAMFLBRDS0), Biscayne (MIAMFLBCDS0), Canal (MIAMFLCADS0), Dadeland (MIAMFLDBRS1), Flagler (MIAMFLFLDS0), Grande (MIAMFLGRDS0 and MIAMFLGRDS1), Hialeah (MIAMFLHLDS0), Indian Creek (MIAMFLICDS0), Key Biscayne (MIAMFLKEDS0), Metro (MIAMFLME32E and MIAMFLMERS0), Shores (MIAMFLSHDS0), North Miami (MIAMFLNMDS0), Northside (MIAMFLNSDS0), Opa Locka (MIAMIFLOLDSO), Palmetto (MIAMFLPLDSO and MIAMFLPLRSO), Poinciana (MIAMFLPBDS0), Red Road (MIAMFLRRDS0), Silver Oaks (MIAMFLSODS0), West Dade (MIAMFLWDDS0) and West Miami (MIAMFLWMDS0).
- 5. On May 8, 2012, AT&T Florida requested additional numbering resources from NeuStar for the Bayshore (MIAMFLBA85E) switch. See Attachment 1. Specifically, AT&T Florida requested a full NXX to establish a test code for its new remote switch that will be replacing the 1AESS in Bayshore. The code will be returned approximately 1 year after it is effective. AT&T Florida needs an unused NPA NXX and is unable to use a donated block from another switch because the new switch needs a home code assigned to the switch. Because the host switch is a tandem switch and there is no NPA/NXX assigned to it, AT&T Florida needs to get a new code for test purposes

to ensure that there is no impact on the service AT&T Florida provides to its customers when the new switch takes over the load of the 1AESS.

- 6. At the time of the code request, the Miami exchange had a MTE of 109.76 and a utilization of 60.66%, while the MTE for the Bayshore (MIAMFLBA85E) switch was 74.31.
- 7. On May 8, 2012, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida requires the full NXX to test the new remote switch to ensure that there are no service issues when the new switch replaces the IAESS. *See* Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Miami exchange. *See* Attachment 2.
- 8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. *See* INC Number Pooling Guidelines Sections 3.7 and 12(c).
- 9. Under its current procedures, NeuStar looks at the number of MTE and utilization for the entire rate center without exception, regardless of the reason for the request, customer impact or public interest impact. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

- 10. AT&T Florida requests that the Commission's reverse NeuStar's decision to withhold numbering resources from AT&T Florida on the following grounds:
- (a) NeuStar's denial of AT&T Florida's request for a full NXX for the Bayshore (MIAMFLBA85E) switch will prevent AT&T Florida from testing its new remote switch and from replacing the existing 1AESS in Bayshore.
- (b) NeuStar's denial of numbering resources to AT&T Florida interferes with AT&T Florida's ability to serve its customers within the State of Florida.
- (c) NeuStar's automated process of considering the MTE at the rate center level requirement is discriminatory against the ILEC, because the ILEC is typically the only local service provider with multiple switches in a rate center. The ILEC deploys multiple switches in a rate center in order to meet customer demand for telephone service. The FCC's rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches. AT&T Florida respectfully submits that it is patently unfair to require that the ILEC only get six (6) MTE in all the switches it has deployed in a rate center, when the CLECs have to meet the MTE requirement in only the single switch that they have deployed to serve their customers in a single rate center or even multiple rate centers.
- 11. The Commission has granted prior requests of AT&T Florida for full NXX's to establish a test code for new remote switches to replace IAESS switches. See, e.g., In re: Petition for expedited review of growth code denial by Number Pooling Administrator for West Palm Beach exchange (Riviera Beach), by BellSouth Telecommunications, Inc. d/b/a AT&T Florida, Docket No. 100310-TL, Order No. PSC-10-0386-PAA-TL (June 15, 2010).

WHEREFORE, AT&T Florida requests:

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

Respectfully submitted this 15th day of May, 2012.

AT&T FLORIDA

Suzanne L. Montgomery

Authorized House Counsel No. 94116

Tracy W. Hatch

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

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REDACTED ATTachment 1 Page 1 of 4

Pooling Administration System					
@att.com (Si	• Sign Out				
	Time : 05/08/2012 08:10:30 PM EDT				
顧 由翻ndividual Block Requests 由紹CO/NXX Code	Printable Version TBPAG Attachment 1 - March 19, 2007				
「Requests 由 毎日 Pending	Thousands-Block Application Form - Part 1A				
Requests 中国Confirm Resources In Service	Tracking <u>786-MIAMI-</u> Number: <u>FL-534386</u> <u>Full NXX:</u> Dedicated				
中語Donate Blocks 中語Submit Forecast	Customer Channe				
中國Search Forms 中國Reports 中國User Profile	Application: New Disconnect				
l .	GENERAL APPLICATION INFORMATION				
	1.1 Contact Information:				
	Block Applicant:				
	Company BELLSOUTH TELECOMM INC DBA SOUTHERN BELL Name: TEL & TEL				
	Headquarters Address:				
	City, State, Zip:				
	Contact Name:				
	Contact Address:				
	City,State,Zip: Phone: AX: F. mail: T. Matt. com				
	Pooling Administrator: ^{II}				
	Contact Dara Flowers				
	Contact Address: 1800 Sutter St				
	City,State,Zip: Concord ,CA,94520				
	Phone: <u>925-363-8730</u> FAX: <u>925-363-7697</u>				
	E-mail: dara.flowers@neustar.biz				
	1.2 General Information:				
	Check one : No LRN needed X LRN needed iii				
	NPA: 786 LATA: 460 OCN: fv Parent Company's OCN 9417 9400				
	Number of Thousands-Blocks Requested : 10				
•	1				

	ching Identification(Switch Entity/POI): V	
City	or Wire Center Name : Rate Center; vi MIAMI	
	e Center Sub Zone:	
1.3 [Dates:	
Date 05/0	e of Application: ^{vii} _ Requested Block Effective Date: ^{viii} 07/13/2012	
poss appli	By selecting this checkbox, I acknowledge that I am requesting the earliest sible effective date the Administrator can grant. Please note that this only lies to a reduction in the Administrator's processing time, however the lest will still be processed in the order received.	
Req	uest Expedited Treatment? (See Section 8.6) YesNoX	
1.4 1	Type of Service Provider Requesting the Thousands-Block :	
	(LEC, IXC, CMRS, Other)	
	Primary type of service Blocks to be used for : Wireline Thousands-Block(s) (NXX-X) assignment Preference (Optional)	
	Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if	
e)	If requesting a code for LRN purposes, indicate which block(s) you will be ping(the remainder of the blocks will be given to the pool)N/A	
1.5	Type of Request:	
Grov	al block for rate center: YesIf Yes , attach evidence of contraction and proof of capability to provide service within 60 days. with block for rate center: YesIf Yes , attach months to exhaust ksheet	
block be a	By selecting this checkbox, I acknowledge that I am willing to accept a ik in red and explicitly understand that the underlying CO code may not yet activated in the PSTN and loaded in the NPAC on the block effective date.	
Тур	e of change(Mark <u>ail</u> that apply)	
	☐ OCN:Intra-company ix ☐ Switching Id ☐ Part 1B	
	☐ OCN:Inter-company × ☐ Effective Date	
Cha	nge block : YesIf Yes , list NPA-NXX-X	
1.6	Block Return :	
a)	Is this block Contaminated Yes No	
b)	If Yes how many TNs are NOT available for assignment :	
c)	Have all new Intra SP ports been completed in the NPAC Yes No	
d)	Has this block been protected from further assignment Yes No	

Disconnect block : Yes _____If Yes , list NPA-NXX-X __

Remarks:	
I hereby certify that the above information requesting an NXX-X because the true and accurate to the best of my knowledge and that this application been prepared in accordance with the Thousands-Block (NXX Pooling Administration Guidelines(ATIS-0300066) available on the web site (http://www.atis.org/inc) or by contacting inc@atis.org as date of this application.	cation X-X) e ATIS



05/08/2012 Title Date

Signature of Block Applicant

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based provider xi. 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.

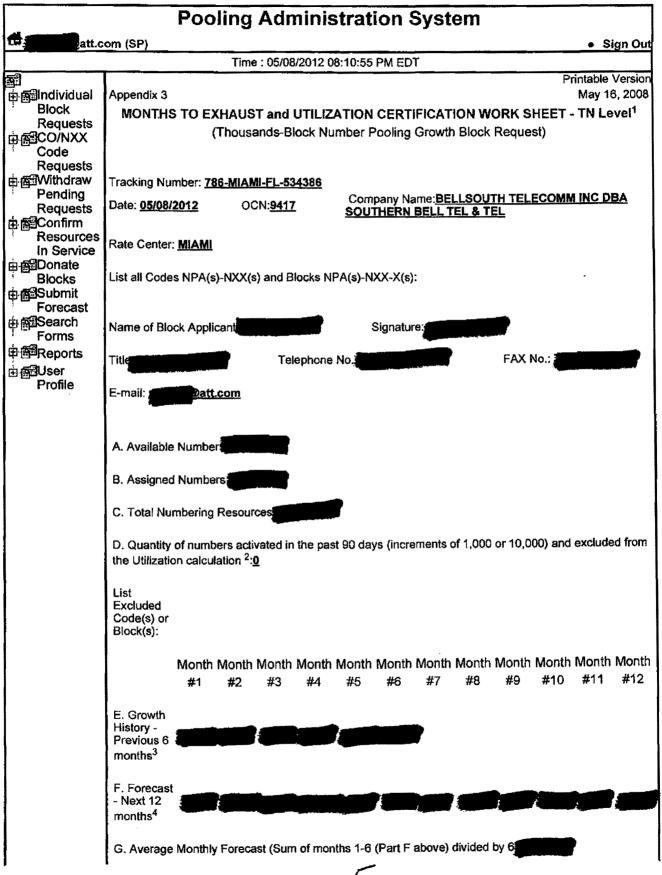
Foot Notes:

- Identify the type of change(s) in Section 1.5.
- ii The Pool Administrator is available to assist in completing these forms.
- ili 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).
- V 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.
- 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 network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- * Select if you are not the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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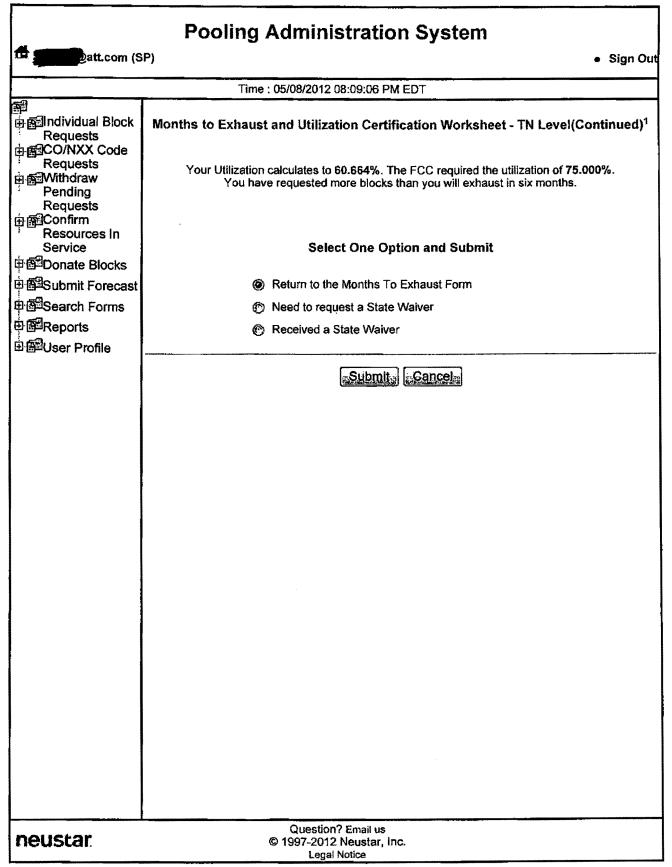
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	H. Months to Numbers Available for Assignment to Exhaust ⁵ Customers(A) =				
	Average Monthly Forecast(G)				
	Block Requested Available Numbers Months To Exhaust 1 109.759				
	Utilization ⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 = 60.664				
	Total Numbering Resources(C)-Excluded Numbers(D)				
	Explanation:				
	¹ 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.				
	² Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000). ³ 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.				
	⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.				
	⁵ 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, section 52.15 (g) (3) (iii)).				
	⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))				
	Back				
neustar	Question? Email us				
itustal.	© 1997-2012 Neustar, Inc. Legal Notice				

GREER, STAN L From: dara.flowers@neustar.biz Sent: Tuesday, May 08, 2012 8:10 PM To: Cc: PA_Part3@neustar.biz Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 786-MIAMI-FL-534386 Pooling Administration System Dated 08-May-2012 November 21, 2003 Attachment 3 ATIS-0300066.at3 Pooling Administrator's Response/Confirmation **TBPAG Part 3** 786-MIAMI-FL-**Tracking Number:** 534386 Date of Application: 05/08/2012 Effective Date: Date of Receipt: 05/08/2012 05/08/2012 Date of Response: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL Service Provider Name: & TEL (Telcordia ™LERG ™ 9417 Routing Guide) OCN: NPAC SOA SPID: **Pooling Administrator Contact Information: Dara Flowers** Phone: 925-363-8730 Signature of Pooling Administrator **Dara Flowers** Fax: 925-363-7697 Name (print) Email: dara.flowers@neustar.biz NPA-NXX or NPA-**Block Assigned:** NXX-X: Block Reserved: **Block Reservation Expiration Date:** Block/Code Modified: Block/Code

	Disconnected :
Block Contaminated(Yes or No):	Water water and a second a second and a second a second and a second a second and a second and a second and a
If Yes, enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1	MIAMFLBARP0
Rate Center:	MIAMI
Rate Center Sub Zone:	
X Form Complete, request denied.	
Explanation:	
DR-57: You do not meet the MTE and/or Utilization request for a new code is denied. You may proceed from the appropriate state commission using this disagreement with the disposition of this request, Thousands'Block Number (NXX-X) Pooling Adminiprocess.	d with requesting a State Waiver Part 3 denial. If you are in please refer to the
Request withdrawn.	
Explanation:	
Assignment activity suspended by the administrat Explanation:	or.
Remarks:	
	TANKA CININ NICIPAL AND
¹ This is an eleven-character descriptor provided by the or calls. This must be the CLLI TM Location Identification code the Part 1A form (Telcordia, LERG ROUTING Guide and Technologies, Inc.)	of the switching entity/POI shown on



Miami Utilization Summary Report (Silver Oaks)

Exchange	Central Office	Wire Center CLLI	Blocks	Available TNs	Average Growth	MTE	Util
Miami	Airport	MIAMFLAPDS0	354				
Miami	Alhambra	MIAMFLAEDS0	170				
Miami	Alhambra	MIAMFLAERS0	6	·			
Miami	Allapattah	MIAMFLALDS0	70				
Miami	Bayshore	MIAMFLBA85E	91				
Miami	Beach	MIAMFLBRDS0	114				
Miami	Biscayne	MIAMFLBCDS0	41				
Miami	Canal	MIAMFLCADS0	185				
Miami	Dadeland	MIAMFLDBRS1	18			_	
Miami	Flagier	MIAMFLFLDS0	62				
Miami	Grande	MIAMFLGRDS0	36				
Miami	Grande	MIAMFLGRDS1	187				
Miami	Hialeah	MIAMFLHLDS0	190				
Miami	Indian Creek	MIAMFLICDS0	67				
Miami	Key Biscayne	MIAMFLKEDS0	21				
Miami	Metro	MIAMFLMRP0	110				
Miami	Metro	MIAMFLMERS0	7				
Miami	Shores	MIAMFLSHDS0	78				
Miami	North Miami	MIAMFLNMDS0	89				
Miami	Northside	MIAMFLNSDS0	66				
Miami	Opa Locka	MIAMFLOLDS0	61				
Miami	Palmetto	MIAMFLPLDS0	117				
Miami	Palmetto	MIAMFLPLRS0	10				
Miami	Poinciana	MIAMFLPBDS0	133				
Miami	Red Road	MIAMFLRRDS0	119				
Miami	Silver Oaks	MIAMFLSODS0	1322				
Miami	West Dade	MIAMFLWDDS0	86				
Miami	West Miami	MIAMFLWMDS0	126				