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October 25, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

021091-TL

Re: [REDACTED] REQUEST FOR NUMBERS

Dear Ms. Bayo:

In accordance with the expedited process established in order PSC-01-1973-PCO-TL (Docket No. 010782-TL), Verizon Florida Inc. (Verizon) requests the Florida Public Service Commission to direct the North American Numbering Plan Administrator (NANPA) to provide Verizon with [REDACTED] numbers in a [REDACTED] number block for St. Petersburg, Florida.

Verizon considers the highlighted information in this letter and attachments to be confidential because it contains the customer's name and the customer's planned use of the requested numbers. Verizon is obligated to protect the identity of the customer and competitors could use this information to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the highlighted information must be kept confidential until returned to Verizon. To assist the Commission in processing this request, the name of the customer who initiated the request is Mr. [REDACTED]. Mr. [REDACTED] may be reached at [REDACTED].

[REDACTED], a Verizon customer, has requested a consecutive range of numbers from [REDACTED] to standardize and reduce confusion with their existing dialing plan, and to support the occupancy of a recently acquired office building in January. The [REDACTED] has informed Verizon these numbers will be used for direct dialing from various departments such as the [REDACTED], and others. Upon receipt of a new NXX and satisfying the customer's request, Verizon will donate any unused thousands blocks to the Pooling Administrator in support of number pooling currently being implemented in the 727 NPA.

On or about August 29, 2002, Verizon submitted a Central Office Code (NXX) Assignment Request to NANPA for the assignment of an NXX resource necessary to meet the customer's request. A copy of this application is attached as Attachment A. Verizon completed the application in accordance with NANPA's Central Office Code (NXX) Assignment Guidelines and filled out the necessary Months to Exhaust Certification, which is attached as Attachment B.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 11748-02. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

REDACTED

DOCUMENT NUMBER-DATE

11747 OCT 25 02

FPSC-COMMISSION CLERK

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Verizon submitted the request for a new central office (NXX) code because Verizon does not have _____ sequential numbers available within the St. Petersburg central office to meet the customer's needs. Although the St. Petersburg office is in the multi-switch rate center of St. Petersburg, Verizon is unable to use numbers from another switch within the rate center to satisfy the request.

On or about September 6, 2002, the NANPA Central Office Code Administrator denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that Verizon does not have the numbering resources needed to satisfy its customer's demand in the switch at issue. This decision is attached as Attachment C.

Under earlier months-to-exhaust procedures used by NANPA, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, NANPA looks at the number of months to exhaust for the entire rate center without any exceptions. However, the FCC's December 12, 2001 Order in its Number Resource Optimization Report and Order, CC Docket No. 99-200, FCC No. 01-362, paragraph 64 states that a carrier "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Also, paragraph 64 states "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." The Florida Commission thus has the authority to review NANPA's decisions and reverse them when appropriate.

Verizon seeks the Commission's review of NANPA's decision to withhold numbering resources. The CO Code Administration decision violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need, and NANPA's denial of numbering resources interferes with Verizon's ability to serve its customers.

Verizon requests that the Commission instruct NANPA to release the numbering resources necessary to meet the needs of _____. Please do not hesitate to call me if you have any questions.

Sincerely,



Michelle A. Robinson
Assistant Vice President
Regulatory Affairs Florida

MAR:lh
Attachments

REDACTED

Central Office Code (NXX) Assignment Request – Part 1
Revised September 11, 2000

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: VERIZON

Headquarters Address: 600 HIDDEN RIDGE DR

City, State, Zip: IRVING, TX 75038

Contact Name: MARGE THOMPSON

Contact Address: 2094 MCGEE LANE

City, State, Zip: LEWISVILLE, TX 75077

Phone: 972-318-5335 FAX: 972-317-2161 E-Mail: MARGE.THOMPSON@VERIZON.COM

Code Administrator:²

Name: TERAH ADGER

Address: 1800 SUTTER STREET SUITE 570

City, State, Zip: CONCORD, CA 94520

Phone: 925-363-8705 FAX: 925-363-8714

1.2 NPA: 727 LATA: 952 OCN:³ 0328 Parent Company's OCN(s) -NONE
Switching Identification (Switching Entity/POI)⁴ SPBGFLXA89H
Locality/City/Wire Center: STPETERSBG Rate Center:⁵ STPETERSBG
Homing Tandem Operating Co.: VERIZON FLORIDA INC Tandem Homing CLLI™:⁷ TAMPFLXA01T

1.3 Dates: Date of Application: 08/29/2002 Requested Effective Date:^{8,9} 11/03/2002

1.4 Type of company/entity requesting the code:
a). LEC (LEC, IC, CMRS, Other)
b). Type of service EOC / POTS (e.g., Cellular - Type 2)
c). Code Assignment Preference (Optional) - _____
d). Codes that are undesirable, if any _____
e). Type of change _____

1.5 Type of Request (Initial, growth, etc.): GROWTH CODE – CUSTOMER REQUESTING ENTIRE NXX
If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pool Indicator _____ (YES)¹⁰

1.6 NPA Jeopardy Criteria Apply: Yes ___ No .X

1.7 Code request for new service(Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached .X for RDBS & BRIDS^{11 12}

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application¹³.

Marge Thompson
Signature of Code Applicant¹⁴

SPECIALIST - SERV INV
Title

08/29/2002
Date

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

Date 08/29/02 Company Name: VERIZON

Rate Center: STPETERSBG

NPA(s)-NXXs included in growth calculation². 727-217 227 299 302 319 320 321 322 323 327 328 341 343 344 345 346 347 360 363 367 368 381 384 391 392
393 394 395 397 398 399 502 520 521 522 525 526 527 528 537 540 541 544 545 546 547 548 549 550 551 552 553 556 557 561 563 564 566 567 568 570 571
572 573 574 575 576 577 578 579 592 768 820 821 822 823 824 825 826 827 864 865 866 867 872 892 893 894 895 896 897 898 906

Signature of Authorized Representative of Code Applicant: Marge Thompson

Title: SPECIALIST - SERV INV Telephone No.: 972-318-5335 FAX No.: 972-317-2161

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 251675

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	
B. Previous 6-month growth history ⁴	<u>605</u>	<u>-7597</u>	<u>-151</u>	<u>-4257</u>	<u>9</u>	<u>3143</u>							
C Forecast – Next months 1-12 ⁵	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	<u>3023</u>	
D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6):	<u>3023</u>												
E. Months to Exhaust ⁶ =	<u>Telephone Numbers (TNs) Available for Assignment (A)</u>						=	<u>83</u>					
								<u>Average Monthly Forecast (D)</u>					
F. Utilization Level ⁷ =	<u>Telephone Numbers (TNs) Assigned</u>						X	100	=	<u>65%</u>			
	<u>Total Numbering Resources in Applicant's Inventory</u>												

Explanation:

~~1 A copy of this worksheet is required to be submitted to the Code Administrator, for audit purposes, it must be in the applicant's files~~
 2 Report on all resources for the requested geographic area, including newly acquired codes.
 3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.
 4 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.
 5 Forecast of TNs needed in each following month, starting with the most recent month as Month #1. In a jeopardy situation, only 6 months growth projection is required.
 6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months (FCC 00-104, § 52.15(g)(3)(iii))
 7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15(g)(3)(ii))

Please discard the Part 3 response

o. 2002. A code was assigned in

Central Office Assignment Request - Part3
Effective May 18, 1998

Code Request Tracking Number: 727-164253

Administrator's Response/Confirmation

Date of Application: August 29, 2002

Date of Receipt: August 30, 2002

Date of Response: September 6, 2002

Effective Date: November 3, 2002

Company/Entity Name: VERIZON FLORIDA INC.

Code Administrator Contact Information:

Terah Adger
Signature of Code Administrator

Phone: 9253638705

Terah Adger
Name (print)

Fax: 9253638714

- NPA: 727 Code Assigned: Date of NXX Code Assignment:
- a. Switch Identification (Switching Entity/POI): SPBGFLXA89H Rate Center: STPETERSBG
- b. The Code Administrator is is responsible for inputting Part 2 information into RDBS and BRIDS.
- c. Routing and Rating information complete: Yes No
Additional RDBS and BRIDS information necessary as follows:
 No
- d. To be published in the LERG and TAMP by
Additional RDBS and BRIDS information needs to be received by the code administrator no later than
Code Reserved: Date of Reservation:
Your code will be honored until
Switch Identification (Switching Entity / POI):
Form incomplete
Additional information required in the following section(s):
- Form complete, code request denied
Explanation:
See Remarks below.
Assignment activity suspended by the administrator
Explanation:
Further Action:
- NPA in jeopardy: Yes No
If yes, refer to Section 7 of the assignment guidelines.

Change/Disconnect List:

Remarks:
OCN # 0328 - DR:11 According to the Central Office Code Assignment Guidelines, Section 4.2.1, code holders requesting growth codes must demonstrate that existing codes within the rate center will exhaust within 6.0 months.