CERTIFICATE OF SERVICE
Petition for the Expedited Review of Growth Code
Denials by the Number Pooling Administrator for the
Miami Exchange (West Dade)

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

First Class U.S. Mail this 23rd day of April, 2009 to the following:

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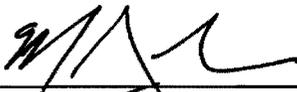
_____
Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth)   Docket No. 090229
Code Denials by the Number Pooling Administrator)
for the Miami exchange (West Dade))   Filed: April 23, 2009
)
_____)

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

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

PARTIES

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

2. NeuStar is an independent non-governmental entity, which is responsible for administering and managing the numbering resources in pooling areas. See 47 C.F.R. § 52.20(d).

JURISDICTION

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

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

BACKGROUND AND REQUEST FOR RELIEF

4.   The 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 (MIAMIFLOLDS0), Palmetto (MIAMFLPLDS0 and MIAMFLPLRS0), Poinciana (MIAMFLPBDS0), Red Road (MIAMFLRRDS0), Silver Oaks (MIAMFLSODS0), West Dade (MIAMFLWDDS0) and West Miami (MIAMFLWMDS0).

5.   On April 17, 2009, AT&T Florida requested additional numbering resources from NeuStar for the West Dade (MIAMFLWDDS0) switch. See Attachment 1. Specifically, AT&T Florida requested 4 blocks to meet the request of a specific customer for 4,000 consecutive numbers in the format of NPA NX7.

6.   At the time of the code request, the Miami exchange had an MTE of 80.62 and a utilization of 64.38%, while the West Dade (MIAMFLWDDS0) switch had an MTE of 75.49.

7.   On April 17, 2009, NeuStar's automated number request system denied AT&T Florida's request for additional numbering resources because AT&T Florida had not met the utilization based criteria, notwithstanding the fact that AT&T Florida is unable to provide the numbering resources requested by the specific customer. See Attachment 1. Pursuant to Commission Order No. PSC-01-1973-PCO-TL, attached to this Petition is the MTE and utilization rate for each switch in the Miami exchange and the customer's contact information. See Attachment 2.

8.   As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. See INC Number Pooling Guidelines Sections 3.7 and 12(c).

9.   Under earlier MTE procedures used by NANPA, waivers or exceptions were granted when customer hardships could be demonstrated or when the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar nor NANPA looks at the number of MTE and utilization for the entire rate center without exception. The current process is arbitrary and results in (1) decisions contrary to the public interest and welfare of consumers in the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

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

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

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

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

WHEREFORE, AT&T Florida requests:

1.   The Commission review the decision of NeuStar to deny AT&T Florida's request for additional numbering resources for the Miami exchange; and

2.   The Commission direct NeuStar to provide the requested numbering resources for the Miami exchange as discussed above.

Respectfully submitted this 23rd day of April, 2009.

AT&T FLORIDA

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Tracy W. Hatch
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REDACTED ATTACHMENT 1

Pooling Administration System

▣ ████████att.com (SP)   ● **Sign Out**

Time : 04/17/2009 01:57:38 PM EDT

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Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking Number: **786-MIAMI-FL-285233**

Full NXX: Pool Replenishment

Type of Application: ☑ New   ☐ Change   ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name:	**BELLSOUTH SO BELL**
Headquarters Address:	████████████
City, State, Zip:	████████
Contact Name:	████████
Contact Address:	████████
City,State,Zip:	████████
Phone:	████ FAX: ████████
E-mail:	████@att.com

Code Administrator: [2]

Name:	**Michael Ortega**
Address:	**46000 Center Oak Plaza**
City,State,Zip:	**Sterling ,VA ,20166**
Phone:	**571-434-5348** FAX: **571-434-5502**

**1.2   NPA: 786   NXX: [3] 9417 9400   LATA: 460   OCN: [4]
Parent Company's OCN(s)**

Switching Identification(Switch Entity/POI) [5]
MIAMFLWDDS0

Locality/City/Wire Center: Rate Center: [6] **MIAMI**

Homing Tandem Operating Co: [7]   Tandem Homing CLLI
AT&T   [8] :**MIAMFLGR05T**

1.3   Dates: Date of Application:04/17/2009

Request Effective Date: [9] [10]

06/22/2009   —

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.

Request Expedited Treatment? Yes _____ No ___ **X** ___

1.4   a)   Type of company/entity requesting the code: ___ **Incumbent Local Exchange Carrier (ILEC)** ___ (LEC, IC, CMRS, Other)

   b)   Types of service: ___ **Wireline** ___ (e.g., Cellular - Type 2)

   c)   Code Assignment Preference (Optional) ___ **CUSTOMER REQUEST CODE TO END IN** ████████████████

   d)   Codes that are undesirable, if any _____ **ALL EXCEPT ABOVE** ___

   e)   Type of change(Mark **all** that apply)

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

   ___ OCN-Inter-company [12]   ___ Effective Date   ___ LATA ___ Extend Reservation

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

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

   Pooling Indicator: [13] ✓ Yes   ___ No

1.6   NPA Jeopardy Criteria Apply: ___ Yes   ___ No

1.7   Code request for new service (Explain): **REQUEST TO MEET CUSTOMER NEEDS AND FOR POOL REPLENISHMENT**

_____

_____

1.8   Part 2 is attached _____ Part 2 is not attached ___ **X** ___ for BIRRDS [14] [15]
Additional Documentation is attached _____ Additional Documentation is not attached ___ **X** ___

Comments:
_____

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

                                                              Associate Technical
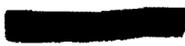
████████████   ████ 04/17/2009

Signature of Code Applicant   Title   Date

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

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

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

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

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

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

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

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

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

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

[11] Select if you are the current Code Holder

[12] Select if you are not the current Code Holder

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

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

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

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

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Pooling Administration System

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Appendix 3   May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level[1]

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **786-MIAMI-FL-285233**

Date: **04/17/2009**   OCN:**9417**   Company Name:**BELLSOUTH SO BELL**

Rate Center: **MIAMI**

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

Name of Block Applicant ▓▓▓▓▓▓   Signature: ▓▓▓▓▓▓

Title: ▓▓▓▓▓▓

FAX No.: ▓▓▓▓▓▓   Telephone No.: ▓▓▓▓▓▓

E-mail ▓▓▓▓▓@att.com

A. Available Numbers: ▓▓▓▓▓

B. Assigned Numbers: ▓▓▓▓▓

C. Total Numbering Resources: ▓▓▓▓▓

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation [2] ▓▓▓▓▓

List Excluded Code(s) or Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History - Previous 6 months[3]	▓	▓	▓	▓	▓	▓						
F. Forecast - Next 12 months[4]	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓

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

H. Months to Exhaust[5] =

$$\text{Months to Exhaust} = \frac{\underline{\text{Numbers Available for Assignment to Customers(A)}}}{\text{Average Monthly Forecast(G)}}$$

Block Requested	Available Numbers	Months To Exhaust
1	███	80.618
2	███	80.758
3	███	80.898
4	███	81.037

I.
Utilization[6] =

$$\frac{\text{Assigned Numbers(B) - Excluded Numbers(D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = 64.367$$

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))

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Pooling Administration System

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Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)[1]

Your Utilization calculates to **64.367%**. The FCC required the utilization of **75.000%**.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

◉ Return to the Months To Exhaust Form

○ Need to request a State Waiver

○ Received a State Waiver

[Submit] [Cancel]

Miami
Utilization Summary
Report
(Silver Oaks)

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Attachment 2

Exchange	Central Office	Wire Center CLLI	Blocks	Available TNs	Average Growth	MTE	Util
Miami	Airport	MIAMFLAPDS0	75				
Miami	Alhambra	MIAMFLAEDS0	175				
Miami	Alhambra	MIAMFLAERS0	5				
Miami	Allapattah	MIAMFLALDS0	60				
Miami	Bayshore	MIAMFLBA85E	82				
Miami	Beach	MIAMFLBRDS0	118				
Miami	Biscayne	MIAMFLBCDS0	45				
Miami	Canal	MIAMFLCADS0	192				
Miami	Dadeland	MIAMFLDBRS1	20				
Miami	Flagler	MIAMFLFLDS0	78				
Miami	Grande	MIAMFLGRDS0	39				
Miami	Grande	MIAMFLGRDS1	426				
Miami	Hialeah	MIAMFLHLDS0	229				
Miami	Indian Creek	MIAMFLICDS0	71				
Miami	Key Biscayne	MIAMFLKEDS0	21				
Miami	Metro	MIAMFLME32E	91				
Miami	Metro	MIAMFLMERS0	10				
Miami	Shores	MIAMFLSHDS0	79				
Miami	North Miami	MIAMFLNMDS0	59				
Miami	Northside	MIAMFLNSDS0	67				
Miami	Opa Locka	MIAMFLOLDS0	61				
Miami	Palmetto	MIAMFLPLDS0	314				
Miami	Palmetto	MIAMFLPLRS0	12				
Miami	Poinciana	MIAMFLPBDS0	96				
Miami	Red Road	MIAMFLRRDS0	133				
Miami	Silver Oaks	MIAMFLSODS0	129				
Miami	West Dade	MIAMFLWDDS0	91				
Miami	West Miami	MIAMFLWMDS0	104				

Miami
Utilization Summary
Report
(Silver Oaks)

REDACTED

Attachment 2

Customer Information