

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Consideration of Telephone Safety)	Case No. 10-884-TP-UNC
Valve Requests and Other Number)	
Resource Related Filings)	

**MOTION OF COX OHIO TELCOM, LLC
FOR REVIEW OF A DECISION OF
THE NORTH AMERICAN NUMBERING POOLING ADMINISTRATOR**

Cox Ohio Telcom, LLC d/b/a Cox Communications ("Cox Communications") is a certificated local exchange carrier providing service in Cuyahoga County, Ohio. One of its customers, Parma City School District, is located in the VICTORY rate center and is in need of additional telephone numbers. Specifically, the Parma City School District needs to use the West Interconnector with 911 service in each of its classrooms throughout the district. These additional telephone numbers would allow 911 dispatch to specifically locate which classroom a call comes from. The feature is not currently installed and it poses a safety and security risk to students and faculty.

There are only 1,011 available telephone numbers in the VICTORY rate center and the Parma City School District is requesting 1,317 telephone numbers.

In response to its customer's need, Cox Communications has recently made a Central Office Code (NXX) assignment request to the pooling administrator seeking a block of numbers for VICTORY rate center.

Attachment A is the TN Administration Block Request ID 1100 which contains the Type of Service Provider Requesting the Thousands-Block, the Months to Exhaust and Utilization

Certification Worksheet, the Growth History-Previous 6 Months, the Forecast-Next 12 Months, the Months to Exhaust and Utilization and Part 1B.

Attachment B is the TN Administration, TN Utilization Summary as of July 7, 2017 for OCN: 385D.

Cox Communications has submitted a request for the special block of numbers to the Pooling Administrator which was denied on July 17, 2017. The explanation for the denial given was as follows:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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.

See Attachment C.

Attachment D is a letter dated July 12, 2017 from the Parma City School District indicating its need of additional telephone numbers in each of its classrooms throughout the district.

The Commission has authority to review the PAS decision and issue a waiver to PAS authorizing assignment of the NPA-NXXs requested by Cox Communications.


Should the Commission Staff need additional information about this waiver request, please contact Rob Howley at 860-432-2873 or at robert.howley@cox.com or Evelyn Allen at 404-269-8562 or at evelyn.allen@cox.com.

WHEREFORE, for the reasons set forth above, Cox Ohio Telcom, LLC d/b/a Cox Communications respectfully request that the Commission or its Attorney Examiner act expeditiously and issue an Entry providing a waiver to the PAS and authorizing assignment of

the numbering resources that Cox Ohio Telcom, LLC d/b/a Cox Communications has requested on behalf of its customer.

Respectfully Submitted,

COX OHIO TELECOM, LLC D/B/A COX
COMMUNICATIONS



Stephen M. Howard (0022421)
Vorys, Sater, Seymour and Pease LLP
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P.O. Box 1008
Columbus, Ohio 43216-1008
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Attorney for Cox Ohio Telcom, LLC
d/b/a Cox Communications

cc: Rob Howley
Evelyn Allen

ATTACHMENT A

TN ADMINISTRATION

Block Request ID 1100

OCN	385D
NPA	440
NPA Relief	
LATA	320
Parent Company OCN	385D
Quantity of Blocks Requested	2
If requesting more than one block, Do you want multiple effective dates?	NO
If requesting more than one block, Do you want multiple switches?	NO
Rate Center	VICTORY
Rate Center Sub Zone	
Switch Identification	PARMOHGGGT0
City or Wire Center Name	
Date of Application	2017-07-17 16:09:43.0
Request Expedited Treatment	NO
Requested Effective Date	08-17-2017

Type of Service Provider Requesting the Thousands-Block	
Type of SP	CLEC
Primary type of Service Blocks to be used for	WIRELINE
Thousands-Block(s) (NPA-NXX-X) Assignment preference	4405585 4405586
Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any	
Type of Request	
Remarks	

Months to Exhaust and Utilization Certification Worksheet	
Codes List NPA(s)-NXX-X(s)	440.340.4, 440.345.5, 440.481.3, 440.558.4, 440.882.3, 440.882.6,
Available Numbers	1011
Assigned Numbers	4376
Total Numbering Resources	6000
Quantity Activated in last 90 days	0
List Excluded Code(s) or Block(s)	

Growth History - Previous 6 Months

Month 1 - 86	Month 2 - 54	Month 3 - 63
Month 4 - 88	Month 5 - 165	Month 6 - 31

Forecast - Next 12 Months			
Month 1 - 1398	Month 2 - 81	Month 3 - 81	Month 4 - 81
Month 5 - 81	Month 6 - 81	Month 7 - 81	Month 8 - 81
Month 9 - 81	Month 10 - 81	Month 11 - 81	Month 12 - 81

Months to Exhaust and Utilization	
Average Monthly Forecast	301
Months to Exhaust	3.36
Utilization Percentage	72.93 %

Part 1B	
Will Block be activated by NPAC ?	NO
Service Provider NPAC SOA SPID	7661
LRN	
Remarks	

ATTACHMENT B

TN ADMINISTRATION
TN Utilization Summary as of 2017-07-17
OCN: 385D

COC	LNP	Special Use	Ratocenter	NPA	NXX	X	InternalOffice	Test	Other	Administrative	Assigned	Residential	Business	Aging	Reserved	Unavailable	Available	Stnd
EOC	Y		BEREA	440	625	6	0	3	0	3	189	7	0	7	2	201	799	609
EOC	Y		BRECKSVL	440	627	6	0	2	0	2	759	12	0	12	0	773	227	609
EOC	Y		BRECKSVL	440	660	2	0	0	0	0	303	13	3	16	5	324	676	609
EOC	Y		CLEVELAND	216	712	4	11	18	0	29	865	83	20	103	2	999	1	609
EOC	Y		CLEVELAND	216	712	6	22	31	0	53	852	70	16	86	7	998	2	609
EOC	Y		CLEVELAND	216	712	7	32	30	0	62	833	70	12	82	6	983	17	609
EOC	Y		CLEVELAND	216	767	5	24	8	0	32	786	43	13	56	0	874	126	609
EOC	Y		CLEVELAND	216	801	4	1	13	0	14	903	69	11	80	3	1000	0	609
EOC	Y		CLEVELAND	216	954	4	0	4	0	4	406	43	6	49	50	509	491	609
EOC	Y		CLEVELAND	440	799	4	3	12	0	15	916	43	11	54	14	999	1	609
EOC	Y		CLEVELAND	440	799	8	4	2	0	6	812	64	11	75	11	904	96	609
EOC	Y		INDEPNCE	216	236	6	0	11	0	11	700	26	0	26	10	747	253	609
EOC	Y		NOROYALTON	440	457	2	1	2	0	3	437	22	1	23	2	465	535	609
EOC	Y		OLMSTEDFLS	440	427	5	0	0	0	0	919	71	0	71	7	997	3	609
EOC	Y		OLMSTEDFLS	440	793	6	1	9	0	10	469	20	0	20	6	505	495	609
EOC	Y		TRINITY	440	827	6	0	52	0	52	260	12	7	19	1	332	668	609
EOC	Y		VICTORY	440	340	4	1	1	0	2	904	92	1	93	0	999	1	609
EOC	Y		VICTORY	440	345	5	6	91	0	97	684	59	1	60	3	844	156	609
EOC	Y		VICTORY	440	481	3	2	4	0	6	891	91	4	95	7	999	1	609
EOC	Y		VICTORY	440	558	4	0	0	0	0	176	8	0	8	26	210	790	609
EOC	Y		VICTORY	440	882	3	0	15	0	15	863	99	1	100	1	979	21	609
EOC	Y		VICTORY	440	882	6	9	16	0	25	858	68	7	75	0	958	42	609

ATTACHMENT C

Gennaro, Ana (CCI-California)

From: agnes.rom@neustar.biz
Sent: Monday, July 17, 2017 1:16 PM
To: Gennaro, Ana (CCI-California); NOC TN Admin
Cc: PA_Part3@neustar.biz
Subject: 440-VICTORY-OH-1029413 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 17 July 2017

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 440-VICTORY-OH-1029413

Date of Application: 07/17/2017 Effective Date: _____
Date of Receipt: 07/17/2017 Date of Response: 07/17/2017

Service Provider Name: COX OHIO TELCOM, L.L.C.
(LERGTM Routing Guide¹) OCN: 385D
Parent Company OCN: 7987

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Agnes Rom Phone: 925-363-7650
Signature of Pooling Administrator
Agnes Rom Fax: 925-363-7681
Name (print)
Email: agnes.rom@neustar.biz

 NPA-NXX or
NPA-NXX-X : Block Assigned: _____
Block Reserved : _____

Block Reservation

Expiration Date : _____

Block/Code

Modified : _____

Block/Code

Disconnected : _____

Block Contaminated (Yes or No): _____

If yes, enter the number of TNs contaminated (1-1000): _____

Switch Identification (Switching/POI)²: _____

PARMOHGGGT0

Rate Center: _____

VICTORY

☒ Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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 Administrator.

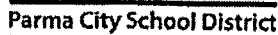
Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

ATTACHMENT D



5311 Longwood Avenue, Parma, Ohio 44134
Phone: 440.885.2324 Fax: 440.885-8492
www.parmacityschools.org/finance

To Whom It May Concern,

The Parma City School District is in need of additional TN's in each classroom throughout the district in order to use the West Interconnect with 911 service through Cox. These additional TN's will allow 911 dispatch to specifically locate which classroom a call comes from. This feature is not currently installed and it poses a safety and security risk to our stakeholders.

Acct# 259715-01
Parma City School District
5311 LONGWOOD AVE
PARMA, OH 44134-3800

Thank You,

Frank C. Kane

Business Manager, Parma City School District

kuser@parmacityschools.org

440-885-2328

Business Office Administration
Rusty Kuse | Business Manager
Jim Leigh | Supervisor Buildings and Grounds
Kathy James | Administrative Assistant

District Administration
Carl H. Hilling | Superintendent
David C. Crowley | Treasurer/CFO
Rusty Kuse | Business Manager

Board of Education
John M. Tenerowicz | President
Michael W. Johns | Vice-President
Karen S. Dendorfer
Kevin C. Kussmaul
Michael R. Lewis

An Equal Opportunity Employer

PCSD PCSD PCSD PCSD PCSD PCSD PCSD

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in

Case No(s). 10-0884-TP-UNC

Summary: Motion Motion of Cox Ohio Telcom, LLC for Review of a Decision of The North American Numbering Pooling Administrator electronically filed by Mr. Stephen M Howard on behalf of Cox Ohio Telcom, LLC d/b/a Cox Communications