BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investi- )

gation into Telephone Numbering and ) Case No. 10-884-TP-UNC

Number Assignment Procedures )

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AT&T OHIO'S REVISED REQUEST FOR REVIEW OF A

DECISION OF NEUSTAR - POOLING ADMINISTRATOR

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AT&T Ohio, by its attorneys and pursuant to 47 CFR § 52.15(g)(3)(iv), submits this revised request for Commission review of a decision of NeuStar – Pooling Administrator ("NeuStar") where AT&T Ohio requested numbering resources in the Cleveland rate center. This revised request is submitted following questions raised by the Commission Staff concerning the original request filed on November 10, 2010 and provides more details and additional clarification as to the customer's specific requirements.

AT&T Ohio requested NeuStar to assign to assign a new NXX for the Cleveland Clinic (“the Clinic”) in order to facilitate the Clinic’s dramatic growth, expansion and reconfiguration plans. The Clinic requested a new NXX code in order to obtain 10,000 consecutive new telephone numbers in the Cleveland rate center since the numbering resources in AT&T Ohio’s inventory are inadequate to meet its needs. More specifically, the Clinic requested the 216-442 code.

The Clinic currently has an enterprise-wide telecommunications system that serves a variety of locations via the SL100 and the OC48 located on the main campus. The enterprise-wide system employs a 5-digit dialing capability and so, requires new numbers that comport with the existing numbering criteria. Thus, the request for the 216-442 NPA-NXX aligns with the existing 216-444,445,636 and 448 numbers. The current telecommunications system will not accommodate use of the XXO, XX1, XX3, XX7 or XX9 as they conflict with other internal extensions.

The Clinic’s request is driven by continued growth, expansion and reconfiguration of its numerous facilities throughout northeast Ohio. First and foremost, a number of new buildings at the Clinic’s main campus are either, currently under construction or will begin being constructed within the next two to four years. The Clinic anticipates that 300 new numbers will be activated in 2011 to service one building currently under construction and another 3,600 new numbers will be utilized in other, soon-to-be constructed buildings, upon their completion.

Expansion of the Independence location, which will require 1,200 new numbers, is also underway, and activation of the numbers needed here is expected to begin by 4Q11. Moreover, personnel from the existing Clinic data center, located several miles east of the main campus, and not currently part of the Clinic’s main telecommunications system, will be moving to two other existing Clinic locations which are currently part of the Clinic’s main telecommunications system sometime during 4Q11. As such, approximately 1,600 new numbers will be required for this initiative. In this case however, the 1,600 telephone numbers which currently serve the existing data center will no longer be needed and so, will be returned to AT&T Ohio once the move is completed.

Additionally, the Clinic will begin to utilize several buildings near the main campus, which it currently leases to other entities, for its own purposes. A small percentage of the workforce that will ultimately occupy these buildings will be individuals relocating from numerous remote locations throughout the area, while the majority is expected to reflect growth in the Clinic’s workforce. Therefore, roughly 2,000 new numbers will be required for this endeavor. While the implementation timeframe is still fluid, it is possible that these buildings could house Clinic personnel as soon as late 2011, thereby requiring number activation during 4Q11. Work is currently underway to firm up this timeframe.

Finally, at some point before the end of the next five year planning cycle, the Clinic expects to deploy an Internet Protocol (IP) based telecommunications system. Such a system will facilitate consolidation of remote locations into one comprehensive, enterprise-wide telecommunications system and unlike today, will enable the Clinic to utilize telephone numbers from the new NPA-NXX at these remote locations. The Clinic expects to use the 1,300 remaining telephone numbers in the new NPA-NXX code for this purpose as well as for as yet unanticipated growth, expansion and reconfiguration needs, and anticipates that assignment of the 216-442 code will sufficiently address its telephone number resource needs for the next five years.

In support of this request it is also important to note that it is common for large business customers to request a full NXX code with number activation plans that span several years. The FCC has recognized this unique need of large business customers through its definition of Assigned numbers. The FCC has defined assigned numbers as numbers working in the Public Switched Telephone Network (PSTN) under an agreement such as a contract or tariff at the request of specific end users or customers for their use, or numbers not yet working but having a customer service order pending. Numbers that are not yet working and have a service order pending for more than five calendar days shall not be classified as assigned numbers. (FCC 00-104, 47 CFR §52.15 (f)(1)(iii)). Inasmuch as the entire NXX code would be “purchased” by the Clinic under terms in the AT&T Ohio PUCO Tariff No. 20 and/or AT&T Ohio Guidebook, and “working” in the PSTN, all of the numbers requested by the Clinic would be recognized by the FCC as assigned numbers under the first classification in the FCC definition of assigned numbers, whether or not they will be utilized immediately – *Assigned numbers are defined as* *numbers working in the PSTN under an agreement such as a contract or tariff at the request of specific end users or customers for their use.*

For the reasons set forth herein, AT&T Ohio respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Cleveland rate center to AT&T Ohio for use by the Cleveland Clinic.

Respectfully submitted,

AT&T Ohio

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