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*Via Hand-Delivery*

Ms. Renee J. Jenkins  
Director of Administration  
Secretary of the Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

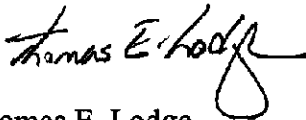
Re: In the Matter of the Commission Investigation into Telephone Numbering  
and Number Assignment Procedures, PUCO Case No. 97-884-TP-COI

Dear Ms. Jenkins:

Enclosed is an original and ten (10) copies of Request of Verizon North Inc. to Review Decision of the Neustar Pooling Administrator, to be filed in connection with the above-referenced matter.

Thank you for your assistance. If you have any question, please feel free to call.

Respectfully yours,



Thomas E. Lodge

cc: Amy Weinrich, Service Quality Analysis Division/Telephone  
Lori Sternisha, Analyst Coordinator Telecommunications Division  
Parties of Record  
A. Randall Vogelzang, Esq.

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Technician SM Date Processed 7/30/07

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission	)	
Investigation into Telephone Numbering	)	Case No. 97-884-TP-COI
and Number Assignment Procedures	)	

---

**REQUEST OF VERIZON NORTH INC. TO REVIEW DECISION OF THE  
NEUSTAR POOLING ADMINISTRATOR**

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Verizon North Inc. ("Verizon") requests that the Commission reverse a decision of the NeuStar Pooling Administrator ("NeuStar") denying access to numbers for one of Verizon's customers. Verizon seeks this relief because there is a verifiable customer need for the numbers. On July 10, 2007, Verizon requested NeuStar to assign 4000 sequential DID telephone numbers for American Honda Motor Co., Inc. ("Honda"). The numbers are needed to accommodate Honda's dialing plan used throughout its various locations.

Verizon submitted the numbering request to NeuStar because Verizon does not have in the Troy central office the requested 500 sequential DID numbers that Honda needs. On July 10, 2007, NeuStar denied the request for the Honda numbers on the grounds that Verizon did not meet the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines.

To temporarily accommodate Honda, Verizon provided 300 non-sequential numbers in the 937-440-1XXX number sequence. However, this arrangement does not

meet Honda's requirements for 500 sequential DID numbers. Therefore, Verizon urgently needs to provide the 500 sequential DID numbers to its customer.

The FCC's rules set forth a procedure to bring the denial of a numbering resource by NeuStar to the appropriate state commission for review. 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." In addition, paragraph 64 says "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." *Id.*

Clearly, Verizon has with Honda a valid requirement to meet the reasonable needs of the customer for a contiguous block of numbers. Therefore, the Ohio Commission has the authority to review NeuStar decision and reverse it where, as here, it is appropriate.

The Honda request is consistent with paragraph 64 of the FCC order that empowers state commissions to grant customer requests seeking contiguous blocks of numbers. *Id.* Attached to this request are copies of Verizon's Thousand Block Application Forms (Attachment A), the Months-to-Exhaust Worksheet (Attachment B), a copy of the denial received from NeuStar (Attachment C) and a copy of the request from Honda (Attachment D).

For the reasons set forth herein, Verizon requests that the Commission overturn the NeuStar decision to withhold the numbering resource that Verizon requested on behalf of Honda, overturn NeuStar's denial and grant Verizon the 500 sequential numbers that it requested.

Respectfully submitted

VERIZON NORTH INC.

By: Thomas E. Lodge

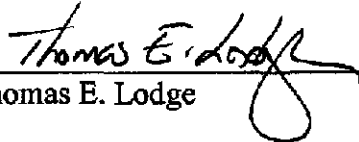
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General Counsel  
Verizon Services Group  
HQE02H37  
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Irving, TX 75038  
(972) 718-2170

Its Attorneys

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon all parties listed on the attached list, by ordinary U.S. Mail, postage prepaid, this 30<sup>th</sup> day of July , 2007.

  
\_\_\_\_\_  
Thomas E. Lodge

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CASE No. 97-884-TP-COI

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# **Attachment A**

## **Application Form to NeuStar**



**Thousands-Block Application Form  
Part1A**

Type of Application (check one):

☒ **New**☐ **Change**☐ **Delete****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: VERIZON NORTH INC.-OH

Headquarters Address:

1 E. PRATT ST. 3E City BALTIMORE State MD Zip 21202Contact Name: Donna Dodson

Contact Address:

1 E. Pratt St. 3E City Baltimore State MD Zip 21202Phone: 410-736-6037

Fax:

E-Mail: donna.m.dodson@core.verizon.com**Pooling Administrator<sup>ii</sup>:**Contact Name: Tara Farquhar

Contact Address:

1800 Sutter St. Suite 570 City Concord State CA Zip 94520Phone: 925-363-7654

Fax:

925-363-7695E-Mail: tara.farquhar@neustar.biz**1.2 General Information:**Check one: No LRN needed X LRN needed<sup>iii</sup> \_\_\_\_\_NPA: 937 Lata: 328 OCN<sup>iv</sup>: 0615 Parent Company's OCN NONENumber of Thousand Blocks Requested: 1Switch Identification (Switching Entity/POI)<sup>v</sup>: TROYOHXADS0 City or Wire Center Name: TROYRate Center<sup>vi</sup>: TROY Rate Center Sub Zone:**1.3 Dates**Date of Application<sup>vii</sup>: 7/5/2007 Requested Block Effective Date<sup>viii</sup>: 8/2/2007Request Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No X**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: EOCc) Thousands-Block(s) (NXX-X) assignment preference (optional) NPA-NXX-0,1,2,8,9d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any NPA-NXX-3,4,5,6,7

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool)

**Thousands-Block Application Form**  
**Part1A**

**1.5 Type of Request**

Initial block for rate center: Yes ☐ , If Yes attach evidence of authorization and proof of capability to provide  
Service within 60 days

Growth block for rate center: Yes ☒ , If Yes, attach months to exhaust worksheet

Change block: Yes ☐ , If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect block: Yes ☐ , If Yes, list NPA-NXX-X

Remarks :

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this  
application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration  
Guidelines ATIS-0300066

*Donna Dodson*  
Signature of Block Applicant

Code Administrator  
Title

7/5/2007  
Date

## **Thousands-Block Application Form Part1A**

### **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 Telcordia™ LERG™ 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 Telcordia™ 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 CLLI™ tandem of the facilities based provider\*. 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. They 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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Thousands-Block Application Form**  
**Part1A**

**Foot Notes:**

<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> 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).

<sup>v</sup> 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 CLLI™ code of the switch /POL.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

**March 23, 2004**  
**Thousands-Block Application Form**  
**Part 1B**

**NPAC BLOCK HOLDER DATA**

*Submit one form per thousands-block request.*

**Request ID #:** OHW0001187

<b>Activation Request:</b>	<b>X</b>	<b>Intra SP Block Porting Request:</b>	_____
<b>Or</b>			
<b>Modification Request:</b>	_____	<b>For Information Only:</b>	_____

**Section A:**

(If request is for Activation, the thousands-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/donating switch information; the PA will fill in those three fields. For a Modification or Intra SP Block Porting Request, the requestor is to provide all information.)

**Pooling Administrator**

**Name** Tara Farquhar  
**Address** 1800 Sutter St. Suite 570  
**City, State, Zip** Concord, CA, 94520  
**Phone** 925-363-7654 **Fax** 925-363-7695  
**E-Mail** tara.farquhar@neustar.biz

**Block Applicant**

**Company Name** VERIZON NORTH INC.-OH  
**Contact Name:** Donna Dodson  
**Address:** 1 E. Pratt St. 3E  
**City, State, Zip** Baltimore  
**Phone** 410-736-6037 **Fax** \_\_\_\_\_  
**E-Mail** donna.m.dodson@core.verizon.com  
**Service Provider NPAC SOA SPID<sup>1</sup>** 0772  
**LRN<sup>2</sup>** 9373397504

**Block (1K) Range<sup>3</sup>**  
**Block Effective Date (MM/DD/YYYY)<sup>4</sup>**  
**Is Block being allocated back to the LERG Assignee on the donating switch? Yes \_\_\_ No \_\_\_**  
**If Yes, do not send Part 1B to the NPAC. If No, forward Part 1B to the NPAC.**

**NPAC Activate Block Range<sup>5</sup>** Yes X No \_\_\_\_\_

**Section B:**

(Block Applicant to provide this data **ONLY** if NPAC Activate Block Range is marked "YES") For Intra SP Block Porting the Block Holder should reflect the routing information of the switch the block is being transferred to<sup>6</sup>.

Class DPC <sup>7</sup>	<u>240-255-240</u>
Class SSN <sup>8</sup>	<u>0 0 0</u>
LIDB DPC <sup>9</sup>	<u>240-255-240</u>
LIDB SSN <sup>10</sup>	<u>0 0 0</u>
CNAM DPC <sup>11</sup>	<u>240-255-240</u>
CNAM SSN <sup>12</sup>	<u>0 0 0</u>
ISVM DPC <sup>13</sup>	<u>NotSuprtd</u>
ISVM SSN <sup>14</sup>	<u>NotSuprtd</u>
WSMSC DPC <sup>15</sup>	<u>N/A</u>
WSMSC SSN <sup>16</sup>	<u>N/A</u>

**March 23, 2004**  
**Thousands-Block Application Form**  
**Part 1B**

SOA Origination<sup>17</sup>N/A**Section C:**

(To be filled out by the SP for Intra SP Block Porting)

To be completed if using 3.0 or higher

New LRN:

Do you want the BCD record updated? Y \_\_\_\_ N \_\_\_\_

**Section D:**

(NPAC is to Activate/Modify/Port the Block (1K), as indicated on this form. When the Block (1K) Activation/Modification/Port is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.)

Block (1K) Request Complete	Yes ____ No ____
Complete Date (MM/DD/YYYY)	__/__/__
Complete Time (HH/MM)	__/__
NPAC Personnel performing change _____	

**Block Holder sent Completed Form:**

Yes \_\_\_\_ No \_\_\_\_

Mailed Date (MM/DD/YYYY)

\_\_/\_\_/\_\_

Mailed Time (HH/MM)

\_\_/\_\_

Contact Name \_\_\_\_\_

**Pooling Administrator sent Completed Form:**

Yes \_\_\_\_ No \_\_\_\_

Mailed Date (MM/DD/YYYY)

\_\_/\_\_/\_\_

Mailed Time (HH/MM)

\_\_/\_\_

Contact Name \_\_\_\_\_

Remarks: \_\_\_\_\_

**Notes:**

- 1) The requesting Block Applicant shall complete this form except for Block Range and Block Effective Date, when submitting PART 1 of the INC Thousands-Block Applicant form to the Pooling Administrator. A separate Part 1B form is to be completed for each 1K Block Range requested.
- 2) The Pooling Administrator will insert Block Range and Block Effective Date information, then submit this form to the regional NPAC at the same time PART 3 of the INC Thousands-Block Applicant form is returned to the requesting Block Applicant.
- 3) Pre-Block Activation:  
a) If the Block Holder is requesting a modification, the Block Holder needs to complete Sections A and any applicable data in Section B of this form and send it to the Pooling Administrator (PA). The PA will forward the form to the NPAC for processing.

**March 23,2004**  
**Thousands-Block Application Form**  
**Part 1B**

4) **Post- Block Activation:** If Block Holder requests NPAC to perform the Block Modification, then Sections A & B of this form should be completed and send to the Pooling Administrator. The Pooling Administrator will send the information on to the NPAC. Upon completion of this request, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.

---

**Foot Notes:**

<sup>1</sup> The Service Provider ID of the block holder. The SPID must be a valid SPID in the NPAC system. If your company does not have a SPID, please call the NPAC at 1-888-NPAC-HEL(P) for assistance.

<sup>2</sup> A Location Routing Number is a 10-digit number, in the format NPA-NXX-XXXX, that uniquely identifies a switch or point of interconnection (POI). The NPA-NXX portion of the LRN is used to route calls to numbers that have been ported.

<sup>3</sup> The Pooling Administrator will insert Block information. The Block will consist of NPA-NXX and the first digit of the 1K block.

<sup>4</sup> The Pooling Administrator will insert Block Effective Date. See section 9.2.4 of the Thousands-Block (NXX-X) Number Pooling Administration Guidelines for specifics on effective date. This is the earliest date that the NPAC will broadcast the Block information to all Local SMS's.

<sup>5</sup> If "YES" is marked the NPAC will activate the block range. If "NO" is marked it will be the responsibility of the SP to activate the block range.

**<sup>6</sup> NANC 191**

Whenever a DPC value is specified, an SSN value likewise must be provided (and vice versa).

The three-digit values used for the first three-digit portion of the DPC must be between 001 and 255 and the three-digit values used for the next two three-digit portions of the DPC must be between 000 and 255.

**NANC 291**

<sup>7</sup> Customer Local Area Signaling Services Destination Point Code for 10-digit GTT for CLASS features for the 1K block.

<sup>8</sup> Customer Local Area Signaling Services Subsystem Number for the 1K block.

<sup>9</sup> Line Information Database Destination Point Code for 10-digit GTT for LIDB features for the 1K block.

<sup>10</sup> Line information Database Subsystem Number for the 1K block.

<sup>11</sup> Calling Name Delivery Destination Point Code for 10-digit GTT for CNAM features for the 1K block.

<sup>12</sup> Calling Name Delivery Subsystem Number for the 1K block.

<sup>13</sup> Inter-Switch Voice Mail Destination Point Code for 10-digit GTT for ISVM features for the 1K Block

<sup>14</sup> Inter-Switch Voice Mail Services Subsystem Number for the 1K block.

<sup>15</sup> Wireless Short Message Service Center Destination Point Code for 10-digit GTT for WSMSC features. This field is only required if the service provider supports WSMSC data.

<sup>16</sup> Wireless Short Message Service Center Subsystem Number for the 1K block. This field is only required if the service provider supports WSMSC data.

<sup>17</sup> The SOA Origination Field must be populated with "No" if the NPAC Activate Block Range is marked "Yes" which specifies that the block applicant will not activate their own block range.

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## **Attachment B**

### **Months-to-Exhaust Worksheet**



**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level<sup>1</sup>**  
**(Thousand-Block Number Pooling Growth Block Request)**

Date: 7/5/2007 OCN: 0615 Company Name: VERIZON NORTH INC.-OH  
 Rate Center: TROY  
 List all codes NPA(s)-NXXs and Block NPA(s)-NXX-X(s): See attached list  
 Name of Block Applicant: Robert Janke Signature: Robert Janke  
 Title: Manager Telephone No: 972-318-5300 FAX No: 972-317-2161  
 E-Mail: robert.janke@verizon.com

A. Available Numbers: 5956

B. Assigned Numbers:

C. Total Numbering Resources:

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:

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 month <sup>2</sup>	<u>-38</u>	<u>-195</u>	<u>-79</u>	<u>143</u>	<u>-29</u>	<u>60</u>						
F. Forecast - Next 12 months <sup>3</sup>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 47

H. Months to Exhaust<sup>4</sup>

Number Available for Assignment to Customers (A)	=	<u>126.7</u>
Average Monthly Forecast (G)		

I. Utilization<sup>5</sup>

Assigned Numbers (B) – Excluded Numbers (D)	* 100 =	
Total Numbering Resources		

Explanation: Total installed = 40000. Total assigned = 30250

<sup>1</sup> A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For audit purposes, the applicant must retain a copy of this document.

<sup>2</sup> 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.

<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup> 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, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

### Appendix 3 Modified August 6,2001

NPA(s)-NXX-Xs included in growth calculation:

937-332-0,1,2,3,4,5,6,7,8,9, 937-335-0,1,2,3,4,5,6,7,8,9, 937-339-0,1,2,3,4,5,6,7,8,9, 937-440-0,1,2,3,4,5,6,7,8,9

## Attachment C

Denial for Block of Numbers by  
NeuStar

Honda

Pooling Administration System - Microsoft Internet Explorer provided by Verizon

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites Media Print

Address <https://www.nationalpooling.com/pas/frames-index.jsp> Go Links

- Request For Reserves
  - Modify
  - Disconnect
  - Block Transfer
- Confirm Block(s) in Service (Part 4)
- Search Forms
- Subnet Forecast
- Create Monthly Forecast
- User Profile
- Create Blocks
- Reports

U.S. 305527 © 1998-2008 NEUSTAR, Inc.  
Legal Notices | Privacy Agreement

## Pooling Administration System

donnam.dodson@verizon.com (SP) [Sign Out](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months

**Select One Option and Submit**

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option

Start | Donna M. Dod... | TELCORDIA - ... | Months To Ex... | Pooling Adm... | 11:15 AM

## **Attachment D**

**American Honda Motor Co., Inc.**

**Request Letter**

# **HONDA**

The Power of Dreams

**1919 Torrance Blvd., Torrance, CA 90501  
(310) 783-2000**

April 10, 2007

Verizon Business

Re: Account number 937-440-5001 (DID stations 4405001-5099,5499)

Verizon Sr. Account Manager, Andrew J. Sarkisian (213) 237-2305

## **Verizon Number Administration:**

On 3/1/07, American Honda Motor Company sent a request for 500 DID stations to be added to an existing group of 100 DID numbers (937-440-5001-5099,5499).

Honda has a dial plan that we use throughout our locations in the United States. We included some restrictions which apply to the last 4 digits only, since any prefix will work with our dial plan. The last 4 digits we cannot use in this Troy location are:

35xx, 44xx, 5499, 59xx, 61xx, 62xx, 64xx, 76xx, 77xx or 78xx.

On April 2<sup>nd</sup> our Verizon representative, Paula Williams, advised us that there were no sequential number banks available. To minimize the impact on our users, we decided to reduce the number requested to 300, and to accept the non sequential numbers in the 937-440-1xxx number range. We hope to use these as temporary numbers until we can acquire sequential DID numbers to swap them with; since we know that non sequential DID numbers are much more difficult to manage on an ongoing basis. Plus, they create a great deal of confusion among users, causing misdials and other problems.

Please let us know when you expect to open up a new prefix, and when we will be able to secure the sequential DID number banks that we need for our Troy, Ohio location.

Sincerely,

Marilyn Nishimura  
American Honda Motor Co., Inc.  
Network Operations  
Ofc. 310-783-2684  
Fax 310-781-5007