

FILE

**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	)	

**MOTION OF THE CHILLICOTHE TELEPHONE COMPANY  
FOR REVIEW OF DECISION OF  
THE NEUSTAR POOLING ADMINISTRATOR**

The Chillicothe Telephone Company requests that the Commission reverse a decision of the NeuStar Pooling Administrator (NeuStar) denying access to numbers for one of The Chillicothe Telephone Company's customers. Horizon seeks the relief because there is sufficient evidence to justify need for the numbers.

In cooperation with the Federal Communications Commission (FCC), a \$14 million grant has been awarded for the building of a fiber optic network to connect healthcare providers in a 15-county region of Southern Ohio. Adena Health System, one of the health care providers, was chosen to oversee the project on behalf of a consortium of health care providers, the Southern Ohio Health Care Network.

The Chillicothe Telephone Company (Chillicothe Tel) is pleased, and presumes that the State of Ohio similarly is pleased, that the FCC has chosen to fund this important project. The Southern Ohio Health Care Network (the project) will have a significant impact on the health and well-being of everyone in the region. The project will create a broadband network encompassing a service area of 15 rural counties that includes 9 of the

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10 most impoverished counties in Ohio and will serve 19 federally qualified health clinics, 8 critical access hospitals, 11 rural health clinics and a host of doctors' offices.

Adena Health System, as overseer of the project, requested Chillicothe Tel to provide it with a contiguous block of 10,000 numbers for the project. This block of numbers will be used by the project to provide health care services efficiently. Access to the contiguous block of numbers is critical to maximizing the efficient and beneficial provision of healthcare services to residents of the 15-county area that the Southern Ohio Healthcare Network will be serving.

Nevertheless, NeuStar inexplicably has denied Adena's request for the contiguous block of 10,000 numbers.

The FCC's rules set forth a procedure to bring the denial of a numbering resource by NeuStar to the 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."

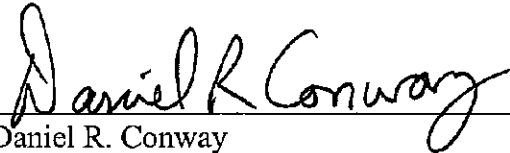
The Chillicothe Telephone Company has a legitimate obligation to meet the reasonable needs of its customer, Adena Health System, for a contiguous block of numbers. The Public Utility Commission of Ohio has the authority to review and reverse the NeuStar decision where appropriate, as it is here.

Adena's request for a contiguous block of 10,000 numbers is consistent with paragraph 64 of the FCC order which provides state commissions with the authority to grant such requests. Attached to this motion are copies of The Chillicothe Telephone

Company's Central Office Code (NXX) Assignment Request Form (Attachment A), the Months-to-Exhaust Worksheet (Attachment B), a copy of the denial received from NeuStar (Attachment C) and a copy of a letter from Adena documenting their requirement of additional numbering resources (Attachment D).

For the reasons set forth herein, The Chillicothe Telephone Company respectfully requests that the Commission act expeditiously and overturn the NeuStar decision to withhold the requested numbering resource and grant The Chillicothe Telephone Company, on behalf of Adena, the 10,000 block of numbers requested.

Respectfully Submitted,

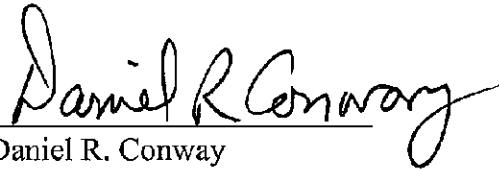
A handwritten signature in black ink that reads "Daniel R. Conway". The signature is written in a cursive style with a horizontal line underneath it.

Daniel R. Conway  
Porter Wright Morris & Arthur LLP  
41 South High Street  
Columbus, OH 43215-6194  
(614) 227-2270  
(614) 227-2100 (fax)

Attorneys for Movant  
THE CHILLICOTHE TELEPHONE CO.

### **Certificate of Service**

I hereby certify that the foregoing Motion was served by First-Class United States Mail, postage prepaid, upon the parties of record on the attached service list, this 1<sup>st</sup> day of May, 2008.

  
Daniel R. Conway

SERVICE LIST  
Case No. 97-884-TP-COI

Network Facilities Manager Centennial Communications 6302 Constitution Drive Ft. Wayne, IN 46804	Carey A. Rosel Technologies Management, Inc. 210 N. Park Avenue P.O. Drawer 200 Winter Park, FL 32790-0200
Tammy Perry Chillicothe Telephone Co. 68 E. Main Street P.O. Box 480 Chillicothe, OH 45601	Kathy Hobbs Windstream Ohio 21 E. State St. Ste. 1900 Columbus, OH 43215
Jouett K. Brenzel Cincinnati Bell Telephone Co. 221 E. Fourth Street Room 103-1280 Cincinnati, OH 45202	Mary Kay Fenlon Legal Department SBC Ohio 150 E. Gay Street, Room 4-C Columbus, OH 43215
Pamela Sherwood Regulatory V.P. Midwest Region Time Warner Telecom 4625 W. 86 <sup>th</sup> St., Suite 500 Indianapolis, IN 46268	Joseph R. Stewart, Esq. Embarq 50 West Broad Street Suite 3600 Columbus, OH 43215
Thomas J. O'Brien, Esq. Bricker & Eckler 100 South Third Street Columbus, OH 43215	Monique Byrnes Technologies Management Inc. P.O. Drawer 200 Winter Park, FL 32790-0200
Sally W. Bloomfield Bricker & Eckler 100 South Third Street Columbus, OH 43215	Vickie Norris CenturyTel of Ohio 17 S. High, Ste. 1250 Columbus, OH 43215
Jeffrey Small Office of Consumers Counsel 10 W. Broad St., Ste 1800 Columbus, OH 43215-3485	John Bentine Chester Willcox & Saxbe 65 E. State, Ste. 1000 Columbus, OH 43215
Nathaniel Hawthorn, Esq. 27600 Chagrin Blvd., Suite 260 Cleveland, OH 44122	Thomas E. Lodge Carolyn Flahive Thompson Hine 10 W. Broad St., Ste 700 Columbus, OH 43215-3435

**Attachment A**

**Application form to NeuStar**

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

Tracking  
Number: **740-CHILICOTH-OH-201969**

Full NXX:  
Dedicated  
Customer

Type of  
Application: ☒ New ☐ Change ☐ Delete

**1.0 GENERAL INFORMATION**

**1.1 Contact Information:**

Code Applicant:

Company/Entity  
Name: **CHILICOTHE TEL CO**

Headquarters  
Address: **68 E MAIN ST.**

City, State, Zip: **CHILICOTHE ,OH ,45601**

Contact Name: **JEFF BLEVINS**

Contact  
Address: **68 E MAIN ST.**

City,State,Zip: **CHILICOTHE, OH, 45601**

Phone: **740-772-8327** FAX: **E-**  
mail: **jeff.blevins@horizontel.com**

Code Administrator: <sup>2</sup>

Name: **Joseph Rano**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5138** FAX: **517-434-5502**

**1.2** NPA: **740** NXX: <sup>3</sup> **0597** LATA: **324** OCN: <sup>4</sup>  
**0597** Parent Company's OCN(s)

Switching Identification(Switch Entity/POI) <sup>5</sup>

**CHLCOHXA77G**

Locality/City/Wire Center: **CHILICOTHE** Rate Center: <sup>6</sup> **CHILICOTH**

Homing Tandem

Operating Co: <sup>7</sup> **CHILICOTHE** Tandem Homing

**TELEPHONE** CLLI

**COMPANY** <sup>8</sup> : **CHLCOHXA51T**

1.3 Dates: Date of Request Effective Date: <sup>9 10</sup>  
Application: 03/28/2008 06/09/2008

Request Expedited Treatment? Yes X No \_\_\_\_\_

Expedited Explanation: THIS REQUEST IS FOR A LARGE MEDICAL FACILITY

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) \_\_\_\_\_

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of change (Mark all that apply)

☒ OCN-Intra-company <sup>11</sup> ☒ Switching Id ☒ Rate Center ☒ Tandem Homing  
CLLI

☒ OCN-Inter-company <sup>12</sup> ☒ 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: <sup>13</sup> ☒ Yes ☐  
No

1.6 NPA Jeopardy Criteria Apply: ☒ Yes ☐ No

1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.8 Part 2 is attached \_\_\_\_\_ Part 2 is not attached X for BIRDRS <sup>14 15</sup>

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: <sup>16</sup>

**JEFF BLEVINS**

Signature of Code Applicant

**ACCESS/COMPENSATION**  
**ANALYST**

Title

**03/28/2008**

Date

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

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

<sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</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 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<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup> 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<sup>TM</sup> COMMON LANGUAGE CLLI<sup>TM</sup> 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.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

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

<sup>9</sup> 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.

<sup>10</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> 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.

<sup>14</sup> Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia <sup>TM</sup> 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.

<sup>15</sup> **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.

<sup>16</sup> An incomplete form may result in delays in processing this request.

**Attachment B**

**Months-to-Exhaust Worksheet**

Appendix 3

August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>  
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 740-CHILICOTH-OH-201969Date: 03/28/2008OCN: 0597Company Name: CHILICOTHE TEL CORate Center: CHILICOTH

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 740-702 740-772 740-773 740-774  
740-775 740-779

Name of Block Applicant: JEFF BLEVINSSignature: JEFF BLEVINSTitle: ACCESS/COMPENSATION ANALYSTTelephone No.: 740-772-8327

FAX No.:

E-mail: jeff.blevins@horizontel.comA. Available Numbers: 23097B. Assigned Numbers: 36903C. Total Numbering Resources: 60000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization  
calculation: 0

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

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth  
History -  
Previous 6

<u>35158</u>	<u>35516</u>	<u>35875</u>	<u>36165</u>	<u>36534</u>	<u>36903</u>
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4/21/2008

**Attachment C**

**Denial of Request by NeuStar**

November 21, 2003  
ATIS-0300086.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 740-CHILICOTH-  
OH-201969

Date of Application: 03/28/2008 Effective Date: \_\_\_\_\_  
Date of Receipt: 03/28/2008 Date of Response: 03/28/2008

Service Provider Name: CHILICOTHE TEL CO  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN: 0597

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Diane Mueller Phone: 925-363-7656  
Signature of Pooling Administrator:  
Diane Mueller Fax: 925-363-7655  
Name (print)  
Email: diane.mueller@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 : \_\_\_\_\_

Switch Identification(Switch Entity/POI): <sup>1</sup> \_\_\_\_\_

CHLCOHXA77G

Rate Center: \_\_\_\_\_

CHILICOTH

Rate Center Sub Zone: \_\_\_\_\_

☒ **Form Complete, request denied.**

Explanation:

**DR-00: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Walver 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 the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)



**Attachment D**

**Adena Health System**

**Request Letter**



Adena Health System  
Information Technology  
272 Hospital Road  
Chillicothe Ohio 45601

Horizon Chillicothe Telephone  
Joe Corbin  
68 East Main Street  
Chillicothe, Ohio 45601

Dear Joe Corbin,

This letter documents our requirement in relation to additional numbering resources. It is understood that Horizon may take this request to the state commission, if needed, to fulfill our request. Horizon Chillicothe Telephone is and has been our primary provider of our phone service for 70+ years.

Adena Health System, with Corporate Offices at Adena Regional Medical Center, is a rural Healthcare system that provides healthcare services to Ross County, and the ten (10) surrounding counties. Adena Health System is continually expanding their clinical services and locations in South Central Ohio. In the past several years we have added 2 Medical Office Buildings, Surgery Center, Critical Access Hospital and 3 Health Care centers. We have voice and data at all these locations. Our Network has grown significantly in the past three (3) years.

It is apparent that the long range plan for the current DID ranges are insufficient. Adena Health System has 14 locations with phone service. AHS is opening a Medical Education Center, Observation unit, five (5) floors for patient care from now until 2009. Our immediate plans call for numerous other projects through 2012, including 3 new building on the main campus. Our network is designed so that all sites have internal 4 digit dialing to all locations. Currently we have the 779 - 4000's -7000's and 8000' numbers, and several separate blocks of 100 in the 5000's. We also have a 100 block in the 702 nxx/exchange. We are requesting a block of 10,000 numbers in the same nxx/exchange. This would allow us to keep our 4 digit dialing, change to 5 digit if needed and expand as we grow. The new exchange would be installed at the Adena Regional Medical Center and disbursed when required.

Thank you for your attention in this matter.

Roganne West  
Manager Technical Operations  
Adena Health System  
272 Hospital Road  
Chillicothe, Ohio 45601  
740.779.7384  
rwest@adena.org