

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

AT&T OHIO'S REQUEST FOR REVIEW OF A
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

AT&T Ohio, by its attorneys and pursuant to 47 CFR § 52.15(g)(3)(iv), respectfully requests that the Public Utilities Commission of Ohio ("Commission") review and overturn the Pooling Administrator's ("PA" or "NeuStar") denial of AT&T Ohio's request for numbering resources, as more fully described herein.

BP Toledo Refinery ("BP") requested additional telephone numbering resources in the Toledo rate center to meet its growth and reconfiguration needs. It is expanding and reorganizing its operations at its Toledo area facility and plans to use the numbering resources in conjunction with Direct Inward Dialing ("DID") service. BP is increasing headcount at the Refinery and at the same time, is moving all existing administrative personnel to a new administration building. In addition, BP is reorganizing and expanding headcount at the Pipeline Division as well. These two initiatives necessitate a need for a total of 2,800 telephone numbers, leaving approximately 200 for any moves, additions, or changes that might arise in the future. BP expects to begin implementing, assigning and activating the new numbers as soon as they are made available to them and expects to return its existing 900 numbers to AT&T Ohio within 90 days. After the returned numbers have gone through the appropriate aging cycle, AT&T Ohio

will evaluate whether any blocks qualify for donation to the pool and will take the appropriate action.

The numbering resources in AT&T Ohio's inventory as well as in the pool have been reviewed and are inadequate to meet the specific needs of this customer. However, at this time, the North American Numbering Plan Administrator ("NANPA") is showing 567 698 NPA NNX available for assignment. Given that inadequate resources were available in the 419 NPA, BP requested blocks 4 through 6 in the 567 689 NPA NXX code in order to be able to retain its existing station number configuration and to consolidate all telephone numbers at its Refinery and Pipeline facilities under one central office prefix. Such an arrangement will also ensure compatibility with BP's existing 4-digit dialing plan and equipment configuration. Constraints with its current telecommunications system include dialing plan requirements for local, local toll, long distance and international dialing that drastically restrict the numbers that BP can use on its phone equipment. Such constraints prevent it from utilizing blocks beginning with 0, 1, 2, 3, 7, 8, or 9, as numbers in these blocks would necessitate significant and costly modifications to BP's current telecommunications system and dialing plans.

AT&T Ohio's application to obtain the required numbering resources will not be processed because AT&T Ohio does not meet the two required FCC criteria for obtain numbering resources in the Toledo rate center, where the 419/567 NPA is not expected to exhaust until 3Q2022. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. AT&T Ohio is at a 412.85 MTE due to the low growth forecast and inventory that does not

qualify for donation. In addition, the FCC requires utilization of 75% or higher and AT&T Ohio is at 51.16%. Thus, neither FCC criteria is met in this case.

The FCC's rules identify a procedure whereby denial of a numbering resource request can be brought to the appropriate state commission for review. 47 CFR § 52.15(g)(3)(iv) provides as follows:

(iv) The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an Operating Company Number (OCN). The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state regulatory commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.

In addition, 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, "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." AT&T Ohio submits that BP's request constitutes special circumstances and demonstrates a clear requirement that warrants the Ohio Commission's review and reversal of NeuStar's decision.

Attached to this request are copies of AT&T Ohio's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of BP's request.

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 Toledo rate center to AT&T Ohio for use by BP Toledo Refinery.

Respectfully submitted,

AT&T Ohio

By:

Jon F. Kelly (Counsel of Record)
Mary Ryan Fenlon
AT&T Services, Inc.
150 E. Gay St., Rm. 4-A
Columbus, Ohio 43215

(614) 223-7928

Its Attorneys

**Thousands-Block Application Form
Part 1A****Type of Application (check one):** ☒ **New** ☐ **Changeⁱ** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: AMERITECH OHIOHeadquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Contact Name: CHEREE DUNLAPContact Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Phone: 925-824-5625 Fax: 925 355 9268E-Mail: cd1796@att.com**Pooling Administratorⁱⁱ:**Contact Name: DIANE MUELLERContact Address: 1800 SUTTER ST SUITE 780 City CONCORDState CA Zip 94520Phone: 925-363-7656 Fax: 925-363-7655E-Mail: dianemueller@neustar.biz**1.2 General Information****Check one:** No LRN needed ☒ **LRN neededⁱⁱⁱ** _____NPA: 419 LATA: 326 OCN^{iv}: 9321 Parent Company's OCN 9300Number of Thousands-Blocks Requested: 3Switch Identification (Switching Entity/POI)^v: ORGNOH69DS1 City or Wire Center Name OGRate Center^{vi}: TOLEDO Rate Center Sub Zone: _____**1.3 Dates**Date of Application^{vii}: 07/16/09 Requested Block Effective Date^{viii}: 08/16/09Request Expedited Treatment? (See Section 8.6) Yes ☒ No _____**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: POTS/CTX/DIDc) Thousands-Block(s) (NXX-X) assignment preference (optional) 419 OR 567-698-4-6d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any 0, 1 - 3, 7 - 9

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) _____.

1.5 Type of Request

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

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

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

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

Disconnect block: No____, 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.

CHEREE DUNLAP (SIGNATURE ON FILE)

Signature of Block Applicant

DATA ADMINISTRATOR

Title

07/16/09

Date

Thousands-Block Application Form Part 1A

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^{ix}. 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 Part 1A

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA

^{iv} 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).

^v 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 /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} 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).

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3 - Modified August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)

Date: 07/16/09 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: TOLEDO

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): THERE ARE 45 NPAS & 154 NXX(S)

Name of Block Applicant: CHEREE DUNLAP Signature: CHEREE DUNLAP

Title: CODE ADMINISTRATOR Telephone No.: 925-824-5625 FAX No.: 925-355-9268

E-Mail: cd1796@att.com

A. Available Numbers: 225284

B. Assigned Numbers: 308008

C. Total Numbering Resources: 601996

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 #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 ²	-8445	-2232	-2972	-1071	-833	-602						
	0	0	3274	0	0	0	-306	-13	118	152	97	103
F. Forecast – Next 12 months ³												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): <u>545..67</u>												
H. Months to Exhaust ⁴												
I. Utilization ⁵												

Explanation: Actual forecast for Month 1 is -3000, MONTH 2 = -668, MONTH 4 = -117, MONTH 5 = -108, MONTH 6 = -282

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 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.

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

⁴ 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)).

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

From: diane.calhoun@neustar.biz
Sent: Thursday, July 16, 2009 1:27 PM
To: CODE ADMINISTRATION CA; DUNLAP, CHEREE (ATTOPS)
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/
Confirmation for Tracking Number: 419-TOLEDO-OH-305578



Pooling Administration System

Dated 16 July 2009

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

**Tracking Number : 419-TOLEDO-
OH-305578**

Date of Application: 07/16/2009 Effective Date: _____

Date of Receipt: 07/16/2009 Date of Response: 07/16/2009

Service Provider Name:	AMERITECH OHIO
(Telcordia TM LERG TM Routing Guide) OCN:	9321

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Diane Calhoun Phone: **925-363-7656**

Signature of Pooling Administrator

Diane Calhoun Fax: **925-363-7655**

Name (print)

Email: [diane.
calhoun@neustar.
biz](mailto:diane.calhoun@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): ¹

ORGNOH69DS1

Rate Center:

TOLEDO

Rate Center Sub Zone: _____

X 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 the administrator.

Explanation:

Remarks:

¹ 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 shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

July 7, 2009



Mr. Gregg Dickson,

Because AT&T had been unable to provide (300) additional consecutive DID's in the same Area Code & NXX's (419) (697 & 698) as the Toledo (Husky) Refinery presently has for their DID's, we are requesting the following:

Requesting **"New" Area Code**

Requesting **"NXX" "698" & (3000) new "DID Nbrs.": 4000 through 6999 inclusive**

NOTE: BP Husky Refinery at 4001 Cedar Pointe Rd., Oregon, Ohio 43616 is planning an expansion this year that will require approximately 2,100 additional DID lines. Our switch has a four digit dial pattern that will accept blocks beginning with 4, 5, or 6. Our switch has code conflicts with 0, 1, 2, 3, 7, 8, and 9.

Our numbers, on existing account (419) R94-6036 644, are all now in the 419 area code, start with 697 and 698. We have recently learned that the area code does not have enough numbers to comply with our request. Based on the fact that AT&T was unable to provide the 300 additional consecutive DID numbers that we requested in January 2009.

BP has now decided to change all of the DID stations at the Refinery, if we can utilize the same area code and central office exchange. In order to do this, we would need 3,000 DID lines and return the existing 900 DID lines to the 419 area code. We are asking for a new area code to be opened and for BP to be able to use 698-4000 through and including 6999. This change would enable us to keep existing station numbers and have one central office prefix code.

Thank You in advance, for your prompt attention to this matter

A handwritten signature in black ink that reads "Troy Easterling". The signature is written in a cursive, flowing style.

Thanks,

Troy Easterling

Information Technology and Services (IT&S)

Site Business Information Manager (BIM)

BP Husky Toledo Refinery

(419) 698-6556 Office

(815) 514-5715 Cell

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first class mail, postage prepaid, on the parties listed below on this 22nd day of July, 2009.

/s/ Jon F. Kelly

Jon F. Kelly

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Case No(s). 97-0884-TP-COI

Summary: Request for review of a decision of NeuStar - Pooling Administrator electronically filed by Jon F Kelly on behalf of AT&T Ohio