

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)	
Investigation into Telephone Numbering)	Case No. 10-884-TP-UNC
And Number Assignment Procedures)	

**MOTION OF AT&T COMMUNICATIONS OF OHIO, INC. AND TCG OHIO
TO REVIEW DECISION OF THE NEUSTAR POOLING ADMINISTRATOR**

AT&T Communications of Ohio, Inc. and TCG Ohio (collectively "AT&T") request that the Public Utilities Commission of Ohio ("Commission") review and overturn the NeuStar, Inc. ("NeuStar") Pooling Administrator ("PA") denial of AT&T's request for numbering resources. This request is based on the Federal Communications Commission ("FCC") rules found at 47 C.F.R. 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee.¹

DISCUSSION

An Ohio customer, Kramer Graphics, has requested that AT&T provide 20 numbers in the Dayton rate center. The customer's letter is attached as Exhibit A. Kramer specially requests the NXX "296" such that it is consistent with their existing dial plan or an NXX which does not have a "69" or "96" thus eliminating confusion or misdialing. AT&T has developed a communications plan that Kramer will implement,

¹ These guidelines may be found on the INC web site: <http://www.atis.org/inc/docs.asp>

and consequently, assign the 20 numbers within 180 days of the numbers being made available to their enterprise.

The Dayton rate center of the 937 area code began number pooling in October, 2002. Consequently, numbering resource acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA.² On August 20, 2010, AT&T submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and Utilization”) to the PA³ using the Pooling Administration System (“PAS”). AT&T requested one thousand block in the Dayton rate center. AT&T received an error message, from PAS, to “Return to the Months-To-Exhaust Form”, indicating the request would not process through the system without a state waiver.⁴ The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources within the rate center will both exhaust within six months, and meet the 75% utilization level. The error message included calculations indicating that neither threshold level was met.

Although AT&T has an adequate supply of telephone numbers usable in this rate center to satisfy incremental requests for numbers without receiving a new block of numbers, AT&T’s existing telephone number resources cannot satisfy this customer’s specific need for a block that does not have a “69” or “96” in the NXX. AT&T holds only 937-269 in this rate center. Therefore, AT&T is required to obtain a thousand number block in order to satisfy the customer’s specific request.

² The federal rules in 47 C.F.R. 52.15 generalize responsibilities of NANPA and the PA under the heading “Central office code administration”.

³ A copy of the Part1A and MTE worksheet are attached as Exhibit B.

⁴ A copy of the error message is appended as the last page of Exhibit B.

The number pool for the Dayton rate center, as of August 27, 2010, holds 55 blocks of numbers.⁵ The customer's request is for an NXX that does not contain a "69" or "96". There are 52 blocks satisfying this requirement. Assignment of one block for this safety valve request will have minimal impact on the rate center pool and on the NPA as a whole.

AT&T respectfully requests that the Commission overturn the PA's decision and/or to issue the state waiver required to allow AT&T to obtain a thousands block of numbers for the Dayton rate center.

Respectfully submitted,

By: /s/ Mary Ryan Fenlon
Mary Ryan Fenlon (Counsel of Record)
Jon F. Kelly
AT&T
150 E. Gay Street
Columbus, OH 43215
614-223-3302
Attorneys for AT&T Communications of
Ohio, Inc. and TCG Ohio

⁵ See PAS Block Report: <http://nationalpooling.org/reports/index.htm>

KRAMER
G R A P H I C S

2408 West Dorothy Lane

Dayton, Ohio 45439-1828

Phone 937.296.9600

Fax 937.296.7496

08/19/2010

**Kramer Graphics
2408 West Dorothy Lane
Dayton, Ohio 45439**

AT&T Number Administration/Code Administration;

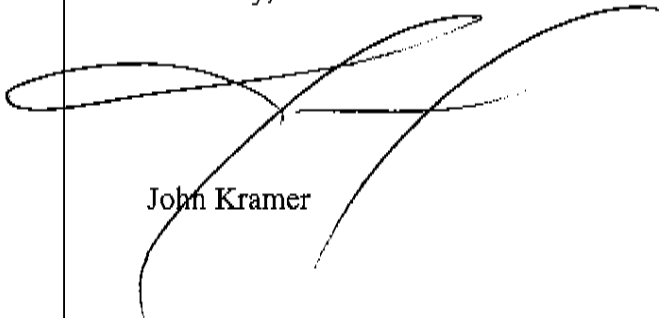
This Letter of Intent represents a request by Kramer Graphics for 20 numbers for prime service. Kramer Graphics intends to order service, in the DAYTON rate center, on the DYTNOH15TMD switch pending AT&T's successful completion of the required testing. Kramer Graphics intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

Kramer Graphics currently has an existing network configuration and therefore technical restrictions exist in the following block:

937-269-0261 thru 0280

These numbers are similar to our 937-296-xxxx numbers. The 9 and 6 are transposed. We feel that this will cause confusion with our staff and customers because numbers may be dialed in the wrong order. We would like any range of 20 numbers that are either in the 296 range or any other range that does not have '96' or '69' as the 5th and 6th digits.

Sincerely,



John Kramer

Part1A

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TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: **937-DAYTON-
OH-382551**
**Individual Block
Request**

Type of Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION**1.1 Contact Information:****Block Applicant:**

Company Name: **TELEPORT COM OH**

Headquarters Address: **One AT&T Way**

City, State, Zip: **Bedminster, NJ, 07921**

Contact Name: **Lisa Loper**

Contact Address: **One AT&T Way**

City, State, Zip: **Bedminster, NJ, 07921**

Phone: **908-234-7622** FAX: **908-234-8044** E-mail: **lloper@att.com**

Pooling Administrator: ⁱⁱ

Contact Name: **Diane Calhoun**

Contact Address: **1800 Sutter St**

City, State, Zip: **Concord, CA, 94520**

Phone: **925-363-7656** FAX: **925-363-7655**

E-mail: **diane.calhoun@neustar.biz**

1.2 General Information:

Check one : No LRN needed ☒ LRN needed ⁱⁱⁱ ☐

Part1A

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NPA: 937 LATA: 328 OCN: ^{iv} 7532 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v

DYTOOHBFCMD

City or Wire Center Name : _____

Rate Center: ^{vi} DAYTON

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 08/20/2010

Requested Block Effective Date: ^{viii} 09/20/2010

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) 937-356-6, 937-716-3, 7
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
- 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:

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 X If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

OCN:Intra-company ^{ix} Switching Id Part 1B

OCN:Inter-company * | Effective Date

Change block : Yes ... If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

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) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Lisa Loper

Signature of Block Applicant

Manager-Code 08/20/2010
Administration

Title Date

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

MTE Block

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Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
 (Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **937-DAYTON-OH-382551**Date: **08/20/2010**OCN: **7532**Company Name: **TELEPORT COM OH**Rate Center: **DAYTON**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **937-269-0**Name of Block Applicant: **Lisa Loper**Signature: **Lisa Loper**Title: **Manager-Code Administration**Telephone No.: **908-234-7622**FAX No.: **908-234-8044**E-mail: **lloper@att.com**A. Available Numbers: **497**B. Assigned Numbers: **440**C. Total Numbering Resources: **1000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: **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
months³

<u>-3</u>	<u>2</u>	<u>-4</u>	<u>-2</u>	<u>33</u>	<u>20</u>
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MTE Block

Page 2 of 2

F. Forecast

- Next 12 months⁴ -5 8 9 10 8 7 7 8 8 9 10 8

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 6.167

H. Months

to Exhaust⁵

=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

497

Months To Exhaust

80.59

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers X 100 = 44.0
(D)

=

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

¹A 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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

LOPER, LISA A (ATTOPS)

From: diane.calhoun@neustar.biz
Sent: Friday, August 20, 2010 11:05 AM
To: LOPER, LISA A (ATTOPS)
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 937-DAYTON-OH-382551

Pooling Administration System

Dated 20 August 2010

November 21, 2003

Attachment 3

ATIS-0300066.at3

**Pooling Administrator's Response/Confirmation
TBPAAG Part 3**

Tracking Number : 937-DAYTON-OH-382551

Date of Application: 08/20/2010 Effective Date: _____
Date of Receipt: 08/20/2010 Date of Response: 08/20/2010

Service Provider Name: TELEPORT COM OH
(Telcordia TM LERG TM Routing Guide) OCN: 7532

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

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

Rate Center:

Rate Center Sub Zone:

DYTOOHBFCMD

DAYTON

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.

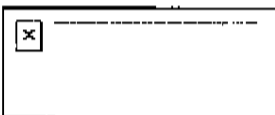
Explanation:

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.)



This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/8/2010 3:36:02 PM

in

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

Summary: Request to review decision of the Neustar Pooling Administrator electronically filed by Ms. Mary K. Fenlon on behalf of AT&T Communications of Ohio and TCG Ohio