

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)	

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.

AT&T Ohio requested NeuStar to assign a new NXX for University Hospitals (“UH”) and 5,000 telephone numbers from this new NXX in order to facilitate UH’s dramatic growth and expansion plans. UH’s request requires a new NXX code be opened in order to obtain 5,000 consecutive new telephone numbers in the Terrace rate center since the numbering resources in both AT&T Ohio’s inventory as well as in the numbering pool are inadequate to meet its needs. More specifically, UH requested new numbers where neither the 4th nor the 6th digits of the NPA-NXX be 0, 1 or 9. The current five-digit dialing pattern and the technological configuration of the telecommunications system cannot accommodate a 0, 1 or 9 in these positions.

UH's request is driven by continued growth and expansion in northeast Ohio. Construction of UH's new Ahuja Medical Center in Beachwood, Ohio, the first Cuyahoga County hospital built from the ground up in 30 years, is nearing completion. The telephone system at this new location will be integrated with the telecommunications system at another nearby medical office building in the city of Orange. Therefore, the newly constructed facilities and the nearby existing facility will share the same dialing plan. As such, UH's goal is to maintain the current 5-digit dialing pattern currently in use at the existing office building. In order for UH to achieve this goal, 5,000 consecutive new numbers, conforming to the criteria previously noted, are required. That is, the newly requested telephone numbers must comport with the existing numbering criteria where neither the 4th nor the 6th digits of the new NPA-NXX are 0, 1 or 9.

Because the first patients will be seen at the new facility beginning in early 2011, three thousand telephone numbers are needed as soon as possible. The new numbers will be activated and programmed into the new telecommunications system as soon as the numbers are made available to UH. Another 1,000 telephone numbers will be activated there by mid-2011. The remaining 1,000 numbers are needed for expansion at the nearby medical facility and will also be activated by mid-2011. UH anticipates that assignment of the 5,000 new telephone numbers will sufficiently address its telephone number resource needs for the next three years. Finally, as UH's need for additional telephone numbering resources is due exclusively to growth and expansion, UH advises that none of the new numbers will be used to replace existing numbers and thus, no existing numbers will be freed up and returned to AT&T Ohio.

UH's request for numbers cannot be filled with AT&T Ohio's existing numbering resource inventory. Recent review of AT&T Ohio's inventory in the Terrace rate center demonstrates that the required number of consecutive telephone numbers meeting the required technical parameters is simply not available. Although AT&T Ohio has an adequate supply of usable telephone numbers in this rate center to satisfy incremental requests for numbers without receiving a new block of numbers, AT&T Ohio's existing telephone number resources cannot satisfy this customer's specific need. Nevertheless, AT&T Ohio's request to obtain the required numbering resources from NeuStar will not be processed because AT&T Ohio does not meet the two required FCC criteria to obtain numbering resources in the Terrace rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. AT&T Ohio is at a 41.59 MTE due to a negative growth history and a low growth forecast for this rate center as well as overly contaminated inventory that does not qualify for donation. In addition, the FCC requires utilization of 75% or higher and AT&T Ohio is at 60%. 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 UH'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 UH'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 Terrace rate center to AT&T Ohio for use by University Hospitals.

Respectfully submitted,

AT&T Ohio

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

(614) 223-3302

Its Attorneys

Appendix 3 - Modified August 6, 2001

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

Date: 11/10/10 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: TERRACE

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): THERE ARE 12 NPAS & 24 NXX(S)

Name of Block Applicant: ROWENA BROWN Signature: ON FILE

Title: CODE ADMINISTRATOR Telephone No.: 925-824-5633 FAX No.: 925-355-9268

E-Mail: rb2548@att.com

A. Available Numbers: 43464

B. Assigned Numbers: 86380

C. Total Numbering Resources: 143994

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	-201	-636	-155	1071	222	412						
	0	317	5349	337	0	267	285	253	243	167	170	-1317

F. Forecast – Next 12 months³

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 1045

H. Months to Exhaust⁴

Numbers Available for Assignment to Customers (A)
Average Monthly Forecast (G) = 41.59

I. Utilization⁵

Assigned Numbers (B) – Excluded Numbers (D)
Total Numbering Resources (C) – Excluded Numbers (D) * 100 = 59.99

Explanation: Actual forecast for Month 1 = -515, MONTH 5 = -230

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.

53, MONTH 6 = -436

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))

**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: ROWENA BROWNContact Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Phone: 925-824-5633 Fax: 925 355 9268E-Mail: rb2548@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: 216 LATA: 320 OCN^{iv}: 9321 Parent Company's OCN 9300Number of Thousands-Blocks Requested: 5Switch Identification (Switching Entity/POI)^v: BCWDOH46DS0 City or Wire Center Name GRORate Center^{vi}: TERRACE Rate Center Sub Zone: _____**1.3 Dates**Date of Application^{vii}: 11/10/10 Requested Block Effective Date^{viii}: ASAPRequest 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) 216-2XX,4-8XX,XX2,XX4-9d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any 216-0XX,1XX,3XX,9XX, XX0,XX1,XX3,XX9 NEITHER THE 4TH OR 6TH NUMBERS CAN BE A 0,1,3,9

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) _____.

Tracking Number: _____

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

Thousands-Block Application Form Part 1A

1.5 Type of Request

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.

ROWENA BROWN (SIGNATURE ON FILE)
Signature of Block Applicant

DATA ADMINISTRATOR
Title

11/10/10
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.

ENGRAM, VERNEDA J (Legal)

From: diane.calhoun@neustar.biz
Sent: Wednesday, November 10, 2010 4:02 PM
To: CODE ADMINISTRATION CA; BROWN, ROWENA R (ATTPB)
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 216-TERRACE-OH-397989

Pooling Administration System

Dated 10-November-2010

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 216-TERRACE-OH-397989

Date of Application: 11/10/2010 Effective Date: _____
Date of Receipt: 11/10/2010 Date of Response: 11/10/2010

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

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:

BCWDOH46DS0

TERRACE

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.)





Nathan Taylor
Manager, Unified Communications

October 29, 2010

Bruce Schwarz
AT&T
45 Erieview Plaza
Cleveland, OH 44114

**Information Technology &
Solutions**
University Hospitals Case Medical
Center
11100 Euclid Avenue, UCRCII, MS
BIS5095
Cleveland, Ohio 44106
216.286-7373 Phone

Dear Mr. Schwarz,

This letter documents our requirements in relation to additional numbering resources. It is understood AT&T may take this request to the state commission, if needed, to fulfill our request.

University Hospitals is building a new medical center and medical office building at 3999 Richmond Rd., Beachwood, OH, 44122, and changing the dialing plan at a nearby medical office building located at 3909 Orange Place, Orange, OH 44122. We require that the new construction and the nearby existing office building share the same dialing plan. Our goal is to maintain the current 5-digit dialing pattern and we are therefore requesting five thousand consecutive numbers. Neither the 4th or 6th digits (nnn-xnn) can be a 1 or a 9. The phone system will not accept blocks beginning with 0, 1 or 9. Four thousand numbers will be installed as DID's at 3999 Richmond (216 R01-8767) and one thousand will be installed as DID's at 3909 Orange (216 R11-2777). We expect that this block will meet our requirements for at least the next three years. We do not anticipate returning any numbers to AT&T.

This request impacts new construction representing an investment of \$33,000,000 to date, with 2 additional phases projected for completion in the next 3 years.

We need these activated as quickly as possible, as the new medical center and office building during the first quarter of 2011. AT&T is our chosen service provider and we understand that they might escalate this request to the state utility commission.

Sincerely,


Nathan Taylor
Manager, Unified Communications

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/16/2010 11:12:04 AM

in

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

Summary: Request to review decision of NeuStar electronically filed by Mrs. Verneda J. Engram on behalf of AT&T Ohio