

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 1,000 consecutive numbers for use in conjunction with Direct Inward Dialing (DID) service by DentalOne Partners (“DentalOne”) in the Montrose rate center. DentalOne is expecting significant growth over the next several years and this request for 1,000 consecutive numbers is the first part of a multi-phased approach to optimize and reconfigure their telecommunications platform. At this time, the number pooling inventory is showing several blocks available for assignment that could meet this request. More specifically, DentalOne requested 1,000 consecutive numbers because it is growing exponentially, it needs to deploy additional telephone numbers for new employees, and it intends to implement a 5-digit dialing plan in the near future. The 5-digit dialing plan will require that last three digits of the telephone number match the three-digit branch code each remote branch location will be designated. Such an arrangement meets the technological criteria of the new

telephone system and ensures that the management capabilities of the new system will be realized, providing DentalOne with a plethora of revenue and expense management capabilities essential for DentalOne to deploy in order to meet their enterprise-wide business objectives. DentalOne is anxious to deploy these capabilities in an expeditious manner.

Because plans are well underway to implement the new plan and investment in the new telecommunications system has already been made, it is imperative to secure the numbers for DentalOne as soon as possible. DentalOne will begin activating and programming the new numbers into the new telecommunications system as soon as the numbers are made available to them. DentalOne expects that the 1,000 numbers will sufficiently address their needs for the next three years. Approximately one-third of the numbers will be used within the first year, and one-third in each of years two and three. Further, since DentalOne's need for the 1,000 consecutive numbers is due primarily to growth, no existing numbers will be freed up and returned to AT&T Ohio.

DentalOne'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 Montrose 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. Review of the pooling inventory however, demonstrates that several blocks meeting DentalOne's requirements are available in the

pool. Nevertheless, AT&T Ohio's request to obtain the desired 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 Montrose rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. AT&T Ohio is at a 157.12 MTE due to a negative growth history and a negative 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 58.83 %. 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 DentalOne'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 DentalOne'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 Montrose rate center to AT&T Ohio for use by DentalOne Partners as soon as possible.

Respectfully submitted,

AT&T Ohio

By: /s/ Jon F. Kelly
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

10-884.DentalOne

**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: 1Switch Identification (Switching Entity/POI)^v: MPHGOH6658A City or Wire Center Name MOORate Center^{vi}: MONTRSE Rate Center Sub Zone: _____**1.3 Dates**Date of Application^{vii}: 11/19/10 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-XX1-XX7d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any 216-XX0,XX8,XX9

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

11/19/10

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.

Appendix 3 - Modified August 6, 2001

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

Date: 11/19/10 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: MONTRSE

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): THERE ARE 7 NXX & 6 NXX/X

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: 26868

B. Assigned Numbers: 44715

C. Total Numbering Resources: 76000

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	890	900	-59	-77	-1	-160						
F. Forecast – Next 12 months ³	0	17	1009	0	0	0	13	-11	-45	-62	-42	-248
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	171											
H. Months to Exhaust ⁴	$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$						=		157.12			
I. Utilization ⁵	$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} \times 100$						=		58.83			

Explanation: Actual forecast for Month 1 = -3097, MONTH 4 = -4 MONTH 5= -7 MONTH 6= -15

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))

From: diane.calhoun@neustar.biz
To: [CODE ADMINISTRATION CA; BROWN, ROWENA R \(ATTPB\);](#)
cc: PA_Part3@neustar.biz;
Subject: PAS - Pooling Administrator's Response/
Confirmation for Tracking Number: 216-MONTRSE-OH-399783
Date: Friday, November 19, 2010 12:08:18 PM

Pooling Administration System

Dated 19-November-2010

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

**Tracking
Number :** 216-
MONTRSE-
OH-399783

Date of
Application: 11/19/2010

Effective
Date:

Date of Receipt: 11/19/2010

Date of
Response: 11/19/2010

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

MPHGOH6658A

Rate Center:

MONTRSE

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.)





August 1, 2010

AT&T

Mark Drehs

2180 Lake Blvd NE

Atlanta, GA 30319

Dear Mark Drehs,

This letter documents our requirements in relation to additional numbering resources. It is understood that AT&T may take this request to the state commission, if needed, to fulfill our request. DentalOne Partners is in need of one thousand consecutive Direct Inward Dialing (DID) telephone numbers at one location. Our firm is expecting exponential growth over the coming years, and this is the first part of a multi-phased approach to optimize our telecommunications platform with AT&T, our chosen telecommunications business partner. Even given our expected growth, we expect that this DID block will meet our growth requirements for at least three years. We are looking to implement a 5 digit dialing plan at some point in the near future. Our DID numbers must be consecutive because the last three digits of each telephone number must match the three-digit branch code at each corresponding location so that we can effectively manage the expenses and revenues of our business. We do not plan on returning these numbers to AT&T. Existing number ranges cause too many numbering and dialing conflicts among branch offices. It is of strategic importance to our business to have a consecutive block of numbers to utilize to achieve our business objectives. DentalOne Partners recently invested \$60,000 in phone systems and software for use with these DID numbers, and this investment would be put at risk without the availability of one-thousand consecutive DID numbers. Moreover, AT&T is our preferred service provider and we rely on our strong partnership with AT&T for important business needs like this DID request. We need these numbers allocated by September 17, 2010. Let me know if you have any questions or require additional information. Our firm does hope that you look favorably upon our request. Thanking you in advance for your cooperation in this matter and looking forward to your favorable reply in the near future.

Regards,

A handwritten signature in black ink, appearing to read "Mark Skinner".

Mark Skinner

I.T. Operations Manger

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/24/2010 2:30:39 PM

in

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

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