

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**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 ("INC").<sup>1</sup>

**DISCUSSION**

An Ohio customer, Fifth Third Processing Solutions ("Fifth Third"), has requested that AT&T provide 4000 numbers in the Little Miami rate center. The customer's letter is attached as Exhibit A. AT&T has developed a communications plan that Fifth Third will implement, and consequently, assign the 4000 numbers within 180 days of the numbers being made available to their enterprise.

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

The Little Miami rate center of the 513 area code began number pooling in March 2003. Consequently, number acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA.<sup>2</sup> On January 6, 2011, 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 PA<sup>3</sup> using the Pooling Administration System (“PAS”). AT&T requested 4 number blocks in the Little Miami rate center. AT&T received an error message, from PAS, to “Return to the Months-To-Exhaust Form”, indicating the request would not process via the system without a state waiver.<sup>4</sup> The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources in 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 in this rate center to satisfy incremental requests without receiving additional numbers, AT&T’s existing number resources cannot satisfy the customer’s need for 4000 numbers. AT&T owns 513-453-5 and 513-833-2 and 8 which are partially or totally activated. Therefore, AT&T is required to obtain the number block in order to satisfy the customer’s request. AT&T’s request is not unlike similar requests that have been previously approved by the Commission.

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

<sup>3</sup> A copy of the Part1A and MTE worksheet are attached as Exhibit B.

<sup>4</sup> A copy of the error message is appended as the last page of Exhibit B.

The number pool for the Little Miami rate center, as of January 7, 2011, holds 11 blocks of numbers<sup>5</sup>, all of which are contaminated. Given there are not 4 blocks in the same NPA-NXX, a new code should be opened. AT&T will use 4 of the blocks for Fifth Third and return the other 6 blocks to the pool; thus providing replenishment.

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 4000 numbers for the Little Miami rate center.

Respectfully submitted,

By: /s/ Mary Ryan Fenlon  
Mary Ryan Fenlon  
AT&T  
150 E. Gay Street, Suite 4C  
Columbus, OH 43215  
614-223-3302

Attorney for AT&T Communications of  
Ohio, Inc. and TCG Ohio

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



12/21/2010

**Fifth Third Processing Solutions**  
**8500 Governors Hill**  
**Cincinnati, OH**

AT&T Number Administration/Code Administration;

This Letter of Intent represents a request by Fifth Third Processing Solutions for 4000 numbers for **BVoIP**. **Fifth Third Processing Solutions** intends to order service, in the Little Miami rate center, on the CNCOOHFPDS1 switch pending AT&T's successful completion of the required testing. Fifth Third Processing Solutions intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

This is going to be Fifth Third Processing Solutions new head-quarters and they need this block of DID's for the new employee's moving into this building.

Sincerely,

A handwritten signature in black ink that reads 'Kelly Schauff'. The signature is written in a cursive style with a large, stylized 'K' and 'S'.

*Kelly Schauff*

Telecommunications Manager, AVP  
Fifth Third Processing Solutions, LLC  
Network Services  
5001 Kingsley Drive, 1MOB1W  
Cincinnati, Ohio 45227  
☎ 513.358.5588  
Fax: 513.358.3409

Code Part1A

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Central Office Code (NXX) Assignment Request  
Part 1 December 9, 2005Tracking  
Number: **513-LTL MIAMI-OH-408304****Full NXX: Pool  
Replenishment**Type of  
Application: ☒ New ☐ Change ☐ Delete**1.0 GENERAL INFORMATION****1.1 Contact Information:**Code Applicant:Company/Entity  
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**  
mail: **lloper@att.com**

E-

Code Administrator: <sup>2</sup>Name: **Michael Ortega**Address: **46000 Center Oak Plaza**City, State, Zip: **Sterling, VA, 20166**Phone: **571-434-5348** FAX: **571-434-5502**1.2 NPA: **513** NXX: <sup>3</sup> **7532** LATA: **922** OCN: <sup>4</sup>  
**7125** Parent Company's OCN(s)Switching Identification(Switch Entity/POI) <sup>5</sup>**CNCOOHFPDS1**

Locality/City/Wire Center:

Rate Center: <sup>6</sup> **LTL  
MIAMI**Homing Tandem Operating Co: Tandem Homing  
CLLI  
<sup>7</sup> **Ameritech** <sup>8</sup> **CNCNOHWS03T**1.3 Dates: Date of Request Effective Date: <sup>9</sup> <sup>10</sup>

Code Part1A

Page 2 of 4

Application: 01/06/201103/13/2011

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? Yes \_\_\_\_ No X1.4 a) Type of company/entity requesting the code: CAP OR CLEC  
(LEC, IC, CMRS, Other)b) Types of service: Wireline (e.g., Cellular - Type 2)c) Code Assignment Preference (Optional) 513-xxx-3, 513-xxx-4, 513-xxx-5, 513-xxx-6

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  
Reservation1.5 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 ☐ No1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.8 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.

Comments:

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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>14</sup>

**Lisa Loper**

Signature of Code Applicant

**Manager-Code**  
**Administration** **01/06/2011**

Title 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 (800-228-8597) 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 shall not be made more than six months prior to the requested effective date.

MTE Block

Page 1 of 2

Appendix 3

May 16, 2008

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

Tracking Number: **513-LTL MIAMI-OH-408304**Date: **01/06/2011**OCN: **7532**Company Name: **TELEPORT COM OH**Rate Center: **LTL MIAMI**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **513-453-5, 513-833-2&8**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: **642**B. Assigned Numbers: **1953**C. Total Numbering Resources: **3000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: **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  
months<sup>3</sup>

<b><u>0</u></b>	<b><u>-30</u></b>	<b><u>0</u></b>	<b><u>0</u></b>	<b><u>400</u></b>	<b><u>-2</u></b>
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MTE Block

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F. Forecast

- Next 12 months<sup>4</sup>    **4319**    **9**    **5**    **6**    **5**    **6**    **7**    **7**    **10**    **12**    **12**    **-21**

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **725.0**

H. Months  
to Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>642</b>	<b>0.886</b>
<b>2</b>	<b>1642</b>	<b>2.265</b>
<b>3</b>	<b>2642</b>	<b>3.644</b>
<b>4</b>	<b>3642</b>	<b>5.023</b>

I.  
Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers X 100 = **65.1**  
= (D)

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

Explanation: \_\_\_\_\_

<sup>1</sup>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.

<sup>2</sup>Quantity 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).

<sup>3</sup>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.

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

<sup>5</sup>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, section 52.15 (g) (3) (iii)).

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

**LOPER, LISA A (ATTSI)**

**From:** diane.calhoun@neustar.biz  
**Sent:** Thursday, January 06, 2011 1:05 PM  
**To:** LOPER, LISA A (ATTSI)  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 513-LTL MIAMI-OH-408304

## Pooling Administration System

Dated 06-January-2011

November 21, 2003

Attachment 3

ATIS-0300066.at3

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

**Tracking Number :** 513-LTL MIAMI-OH-408304

Date of Application: 01/06/2011      Effective Date: \_\_\_\_\_  
 Date of Receipt: 01/06/2011      Date of Response: 01/06/2011

Service Provider Name: TELEPORT COM OH  
 (Telcordia <sup>TM</sup> LERG <sup>TM</sup> 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](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): <sup>1</sup>

Rate Center:

Rate Center Sub Zone:

CNCOOHFPDS1

LTL MIAMI

**X Form Complete, request denied.**

Explanation:

**DR-57: 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 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.**

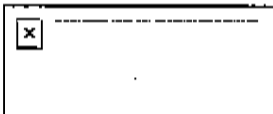
Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<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.)



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/12/2011 3:59:14 PM**

**in**

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

Summary: Motion to modify number ruling by Neustar electronically filed by Ms. Mary K. Fenlon on behalf of AT&T Communications of Ohio and TCG Ohio