



221 E. Fourth St.
P.O. Box 2301
Cincinnati, Ohio 45201-2301

January 31, 2011

Ms. Renee Jenkins
Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests
and Other Number Resource Related Filings, PUCO Case No. 10-0884-TP-UNC

Dear Ms. Jenkins:

Accompanying this letter is a Petition of Cincinnati Bell Extended Territories LLC for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachments are being filed electronically and are contained entirely within this PDF file. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-6671.

Sincerely,

A handwritten signature in blue ink that reads "Patricia L. Rupich". The signature is fluid and cursive, with the first name "Patricia" being the most prominent.

Patricia L. Rupich

cc: Jay Agranoff (via e-mail)
Lori Sternisha (via e-mail)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Consideration of Telephone Safety Valve)	Case No. 10-0884-TP-UNC
Requests and Other Number Resource)	
Related Filings)	

**PETITION OF CINCINNATI BELL EXTENDED TERRITORIES LLC
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

Cincinnati Bell Extended Territories LLC (“CBET”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBET request for numbering resources. On January 25, 2011, CBET filed a request with the PA seeking an entire NXX in the Springfield rate center to meet a specific customer request that CBET was unable to satisfy with its existing numbering resources. The PA denied CBET’s request on the grounds that CBET does not meet the months-to-exhaust criterion established by the Federal Communications Commission. Under the federal numbering rules, a state commission may overturn the PA’s decision based on its determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹ For the reasons set forth below, CBET submits that the Commission is justified in overturning the PA’s decision and granting CBET’s request for a new NXX to meet this customer’s needs.

The Federal Communications Commission (“FCC”), in its Third Report and Order in the Numbering Resource Optimization proceeding, found that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the

¹ 47 CFR 52.15(g)(4)

carrier's inability to satisfy a specific customer request.”² It also clarified that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers.³ Therefore, this Commission has the authority to overturn the PA's decisions under the appropriate circumstances.

Community Mercy Health Partners' Request

In the immediate case, CBET has a request from Community Mercy Health Partners (“CMHP”) for 10,000 numbers to be used for a new hospital system it is establishing in Springfield, Ohio (see Attachment A). The new Springfield Regional Medical Center (“SRMC”), scheduled to open in November 2011, will replace two existing hospitals that currently serve the region. The 254 bed SRMC will provide a full range of inpatient and outpatient care. If needs warrant, the facility can be expanded by an additional 60 beds. As explained in the attached letter from CMHP, the new facility is designed to take full advantage of the latest technology to meet its communications needs (see Attachment A).

CMHP has requested a full NXX that will enable it to have a consistent 7-digit dialing plan for the new facility as well as a host of other related health care facilities and providers in its region. Currently, CMHP has approximately 3,500 numbers in use between the two existing hospitals, however, these numbers are scattered over four NXXs. CMHP wants to unify all of its Springfield area facilities under a single NXX in order to eliminate confusion to its patients, patients' families, doctors and staff. CMHP

² Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200*, FCC 01-362, (rel. Dec. 28, 2001) (Third Report and Order) at ¶64.

³ *Id.*

anticipates using 5,000 of the new numbers immediately for the new hospital and associated medical offices. The remaining 5,000 numbers would be set aside for future needs as CMHP grows to meet the health care needs of the community.

Once the new SRMC is open and existing services are transitioned to the new NXX, CMHP will return most of its existing numbers. However, since the majority of the existing numbers have been ported to CBET from CMHP's old service provider, CBET will not retain the numbers in its inventory. In accordance with the local number portability and telephone number administration guidelines, the ported numbers will "snap back" to the original service provider.⁴

CBET has no unopened NXXs in the Springfield rate center, nor does it have any unopened thousands-blocks within the rate center. The four thousands-blocks in CBET's Springfield rate center inventory have a utilization rate of over 79%. However, as shown on the attached Pooling Administration Worksheet, its projected months-to-exhaust is greater than the maximum six months required to support a request for additional numbering resources (see Attachment B). As a result, CBET's request for an NXX to meet CMHP's needs was rejected by the PA.

⁴ *North American Numbering Council Interservice Provider LNP Operations Flows*, April 15, 1997. *Guidelines for the Administration of Telephone Numbers*, ATIS-0300070, November 12, 2010., pp. 5-6, Section 2.6.

Conclusion

For the reasons set forth above, CBET requests that the Commission overturn the PA's decision and direct the PA to grant CBET's requests for a full NXX in the Springfield rate center to satisfy the needs of its customer.

Respectfully submitted,

/s/ Jouett K Brenzel

Jouett K. Brenzel (0073508)
221 East Fourth Street, Room 103-1280
Cincinnati, Ohio 45202
(513) 397-7260

Attorney for Cincinnati Bell Extended
Territories LLC

ATTACHMENT A



The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

November 29, 2010

Dear Commissioner's,

Please accept this letter as a formal request for a block of 5000 consecutive DID numbers that will be used for a new hospital system in Springfield, Ohio. We would also respectfully request to reserve the remaining 5000 of the exchange for a corporate dialing plan.

The need for this request is created by Catholic Health Partners continued growth and commitment to Ohio and the patients we serve. The enhancement to our facility will increase CHP's presence by adding 254 acute care beds and further CHP's commitment to provide quality Healthcare jobs in Ohio. Furthermore, CHP is in the process of deploying Cisco IP Telephony at our inpatient facilities allowing us to eliminate high maintenance PBX equipment. These savings will be used to further our commitment to our patients by improving our advanced clinical software with the implementation of EPIC.

Community Mercy Health Partners is a comprehensive, integrated regional healthcare system, renowned for our quality, innovation, compassionate service, and culture. It was established in 2004 when The Community Hospital of Springfield and Clark County joined the larger Catholic Health Partners system which covers 5 states and is the largest not-for-profit healthcare system in Ohio.

Community Mercy Health Partners commits to carry out the Catholic Healthcare Partners mission within our community by providing safe, effective, patient/resident centered, timely and cost efficient care and education to meet the health needs of all people, especially the poor and underserved. Our commitment to this healing ministry will be evidenced by exceptional care, compassion and respect for the diverse religious beliefs and faith traditions of those we serve.

Springfield Regional Medical Center represents the culmination of this merger as we build a new state-of-the-art facility to replace the two existing hospitals. The Medical Center will provide a full range of inpatient and outpatient care. It is opening with 254 beds but has the capability to add another floor to the

patient towers and expand by an additional 60 beds if warranted. The history of the service that this combined healthcare organization has provided to the local community goes back well over 100 years. The construction of the new hospital is a pledge to the community to continue that commitment and to strengthen it.

The Medical Center is designed to take full advantage of technology in the service and support of patients, families, care providers and staff including the following:

- Electronic medical record with physician order entry
- Wireless cell phones allowing staff to receive alerts from the patients to whom they are assigned including monitor alarms, nurse call requests, phone calls from families and physicians
- Patient location system to promote secure communication regarding the special needs of patients, communication when patients are taken out of their rooms for treatment and rapid turnaround of beds to prepare for new admissions
- Distributed antenna system providing seamless cell phone coverage within the facility for major cell carriers
- Interactive television system via flat-screen TVs providing information, education and entertainment to patients and families
- Complete wireless coverage for telemetry signals allowing monitored patients to move at will within the facility
- Complete wireless coverage for the network across all areas of the property, with guest wireless access available for patients and, families
- Secure remote communication to the facility so care providers who are offsite can access systems and diagnostic information on their patients
- Radiology and cardiology PACS (picture archiving and communication systems) either onsite or accessed via network connectivity, to provide the highest quality diagnostic information available. Access to PACS images on high resolution monitors positioned throughout the facility including trauma rooms
- Bar coded medication administration to enhance patient safety
- Voice-over-IP telephone technology
- Fully redundant fiber network throughout the facility and connecting the facility to the organization's offsite data center
- A women's health services Pavilion being constructed on the same campus and sharing the same network and telephone system, operated by the Community Hospital Foundation
- An attached medical office building to be constructed in a later phase.

Springfield Regional Medical Center joins a host of healthcare facilities and providers in its region, including:

- Mercy Memorial Hospital, a critical access hospital in a rural community north of Springfield
- Long-term care facilities: Oakwood Village, St. John's Center, Siena Woods and McAuley Center
- Outpatient surgery center
- Wound care center
- Sports medicine/physical rehabilitation center
- Sleep Center
- Regional Cancer Center
- Regional Imaging Center
- 7 outpatient laboratory centers
- Occupational Health center
- Pediatric Rehabilitation
- Home Medical Equipment
- Medical offices for hospital-owned physician practices – approximately 5 at this time with a plan for an additional 28 offices by the end of 2011 and steady growth thereafter.

Catholic Health Partners, Community Health Partners is requesting 10,000 consecutive numbers for this complex which will allow us to open the new facility, plan for growth in staff and patient care as well as implement a corporate wide 7 digit dialing plan. It is one of our challenges to reduce the confusion to our patients, patient's families, doctors and staff acceptance of this request will help to accomplish this transition by allowing one single prefix.

Commissioners' please consider our request for 5,000 active and 5,000 reserved numbers for our enterprise to meet our current and future needs. Should you need any additional information please do not hesitate to contact me with any questions you may have regarding this request.

Thank you in advance for accepting this request!

Respectfully,

Robert Gumino

Catholic Health Partners Information Technology (CHPIT)

Corporate Manager, Telecommunications














RDGumino@Health-Partners.org

ATTACHMENT B

Pooling Administration System

 denise.cozad@cinbell.com (SP)[• Sign Out](#)

Time : 01/25/2011 05:32:24 PM EST

-  Individual Block Requests
-  CO/NXX Code Requests
 -  New Code Request
 -  Code Modification
 -  Code Disconnect
 -  Copy Code Request
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Need to request a State Waiver
- ☐ Received a State Waiver














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Pooling Administration System

 donise.cozad@cinbell.com (SP)[• Sign Out](#)

Time : 01/25/2011 05:19:44 PM EST

-  Individual Block Requests
-  CO/NXX Code Requests
 -  New Code Request
 -  Code Modification
 -  Code Disconnect
 -  Copy Code Request
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

Request Resources

States * OHIO

NPA * 937

Rate Center * SPRINGFLD


OCN * 309B-CINCINNATI BELL EXT

Type of Application: Full NXX for Dedicated Customer














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Pooling Administration System

 denise.cozad@cinbell.com (SP)

Time : 01/25/2011 05:20:43 PM EST

-  Individual Block Requests
-  CO/NXX Code Requests
-  New Code Request
-  Code Modification
-  Code Disconnect
-  Copy Code Request
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

Type of Application: New Code

Part1/1A

1.1 Contact Information :

Note: If any of the contact info is incorrect,

Code/Block Applicant:

Company/Entity Name CINCINNATI BELL EXT
Headquarters Address 201 E 4th Street
City Cincinnati
State OH
Zip 45202

Contact Name Denise S Cozad

Contact Address 209 E4th Street, 121-1075
City Cincinnati
State OH
Zip 45202

Contact Phone 513-566-4130

Contact Fax 513-651-9089

Email denise.cozad@cinbell.com

Pooling Administrator¹:

Name Diane Calhoun
Address 1800 Sutter St
City Concord
State CA
Zip 94520
Telephone 925-363-7656
Fax 925-363-7655
Email diane.calhoun@neustar.biz

Code Administrator²:

Name Michael Ortega
Address 46000 Center Oak Plaza
City Sterling
State VA
Zip 20166
Phone 571-434-5348
Fax 571-434-5502

1.2 General Information

LRN Needed³ NO

NPA 937

NXX³LATA³ 328

OCN^{iv,4} 309B-CINCINNATI BELL EXT
Parent Company
OCN^{*} NONE
Number of
Thousands-Blocks 10
Requested
Locality/City/Wire
Center
Switch Identification
(Switching HMTNOHHMDS3
Identity/POI) Code ^{v,5-}
Rate Center^{vi,6} SPRINGFLD
Rate Center Sub
Zone
Homing Tandem
Operating Company ^{*7} CINCINNATI BELL EXTENDED TERRITOF Homing Tandem
CLLI⁸⁻ CNCNOHWS20W

1.3 Dates

Date of
Application^{vii} 01/25/2011
Requested
Effective date 04/01/2011 MM/DD/YYYY
Code ^{viii,9,10-}

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

Requested
Expedited ☐ Yes ☒ No Expedite Documentation must be provided if "Request Expedite" = Yes
Treatment

Expedited
Explanation

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of
Company^{*} CAP OR CLEC
b) Type of
Service^{*} Wireline
c) Code
Assignment
Preference
(Optional)

NOTE: For a list
of available
codes go to the
NANPA website
at
www.nanpa.com;
click on Reports
then Central
Office Codes.

d) Codes that
are undesirable,
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 ☒ Growth

Pooling
Indicator¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria

1.7 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 cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Remarks

Submit ¹⁴

Cancel

Part1A Foot Notes

Part1 Foot Notes

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.¹⁴

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration (0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date

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Pooling Administration System

denise.cozad@cinbell.com (SP)

Time : 01/25/2011 05:30:28 PM EST

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

- ☐ Individual Block Requests
- ☐ CO/NXX Code Requests
- ☐ New Code Request
- ☐ Code Modification
- ☐ Code Disconnect
- ☐ Copy Code Request
- ☐ Withdraw Pending Requests
- ☐ Confirm Resources In Service
- ☐ Donate Blocks
- ☐ Submit Forecast
- ☐ Search Forms
- ☐ Reports
- ☐ User Profile

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

937-521-1, 2, 3, 4

Date: Tuesday, January 25, 2011

OCN 309B

Company Name CINCINNATI BELL EXT

Rate Center: SPRINGFLD

Code/Block Applicant: Denise S Cozad

Title: Technical Clerk 3

Phone: 513-566-4130

Fax: 513-651-9089

E-Mail: denise.cozad@cinbell.com

A. Available Numbers:* 820

B. Assigned Numbers:* 3180

C. Total Numbering Resources:* 4000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation2:* 0

List excluded Code(s) or Block(s)

E. Growth History Previous 6-months³:-

Month 1	195	Month 2	9
Month 3	14	Month 4	30
Month 5	27	Month 6	-7

F. Forecast Next 12 months⁴:-

Month 1	45	Month 2	45
Month 3	45	Month 4	45
Month 5	45	Month 6	45
Month 7	45	Month 8	45
Month 9	45	Month 10	45
Month 11	45	Month 12	45

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **45.0**

H. Months to Exhaust ⁵ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	820	18.222

I. Utilization⁶(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **79.500**

Explanation

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering auditing purposes, the applicant must retain a copy of this document.

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

³ Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as A current month.

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

⁵ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 (3)(iii)).

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

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Commission of Ohio Docketing Information System on

1/31/2011 1:30:04 PM

in

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

Summary: Petition Petition for Review of a Decision of the Number Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Extended Territories LLC