

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	)	

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AT&T'S REQUEST FOR REVIEW OF A  
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

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AT&T Communications of Ohio, Inc. and TCG Ohio (collectively "AT&T") 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's request for numbering resources, as more fully described herein. 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.<sup>1</sup>

An Ohio customer, Battelle Memorial Institute ("Battelle"), has requested that AT&T provide 2000 numbers in the West Jefferson rate center, in an NPA-NXX of the format NPA-NX2, NPA-NX3 or NPA-NX7 such that the new numbers can be integrated into their existing 5-digit dial plan connecting several Ohio locations. The customer letter is attached as Exhibit A. AT&T has developed a communications plan that Battelle will implement, and subsequently,

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

assign the 2000 numbers within 180 days of the numbers being made available to their enterprise.

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.

The West Jefferson rate center, in the 614 area code, began number pooling in April 2003, therefore number acquisition by a Number Pooling carrier, such as AT&T, is gained through an interface with the PA.<sup>2</sup> On February 3, 2011, AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months-to-Exhaust and Utilization Certification Worksheet –

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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".

TN Level” (“MTE and Utilization”) to the PA<sup>3</sup> using the Pooling Administration System (“PAS”). AT&T requested 2 number blocks in the West Jefferson 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 6 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 Battelle’s need for 2000 numbers in a 2, 3 or 7 block. AT&T owns only 614-379-9 which already has over 300 numbers active. Therefore, AT&T needs to obtain the number block in order to satisfy the customer’s request.

The number pool for the West Jefferson rate center, as of February 4, 2011, holds 26 blocks of numbers<sup>5</sup>, of which 6 are contaminated. Of the 20 blocks remaining, there are 7 blocks in 614-642 which satisfy their specific requirement of being in the NPA-NX2 block.

AT&T respectfully requests that the Commission overturn the PA’s decision and issue the state waiver required to allow AT&T to obtain 2000 numbers for the West Jefferson rate center.

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<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.

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

AT&T submits that its 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's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of AT&T's request.

For the reasons set forth herein, AT&T respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the West Jefferson rate center to AT&T.

Respectfully submitted,

AT&T

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

(614) 223-3302

Its Attorneys

January 31, 2011

Tony Moog  
Sales Executive  
AT&T Premier Client Group  
150 E. Gay. St.  
8th Floor  
Columbus, OH 43215

#### AT&T Number Administration/Code Administration

Mr. Moog:

This Letter of Intent represents a request by Battelle Memorial Institute for 2000 phone numbers for LNS Prime services. Battelle Memorial Institute intends to order service, in the WJEFFERSON rate center, on the CLMBOHFQDS2 switch pending AT&T's successful completion of the required testing. Battelle Memorial Institute intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

Battelle's current network plan uses 614-424-NNNN numbers as shown in detail below to support all telephones on two campuses. One in Columbus at 505 King Avenue and another at 1425 Plain city Georgesville Road in West Jefferson OH. These numbers are split randomly between the two locations using a corporate PBX which serves both locations.

The West Jefferson location currently has over 950 telephone devices. Battelle is expanding this site and will open a new building in August 2011 which will require 400 additional numbers at the outset and is expected to grow to 800 numbers in 2-3 years time.

Battelle wants to change all the telephone numbers at West Jefferson from the 614-424-NNNN and assign new numbers for West Jefferson – thus the request for 2000 new DID's. The 614-424-NNNN numbers formerly used at West Jefferson will be reused for expanded services at the 505 King Avenue Columbus location only.

Our current existing network configuration uses 5 digit dialing with 0 used for operator, 1 is used for call park, 4-xxxx, 5-xxxx, 6-xxxx, and 8-xxxx used for extension dialing and 9 for outside access. The 4-xxxx extensions are associated with the DID numbers shown below. Battelle needs to maintain 5 digit dialing for an additional 2000 TNs at the site. Based on our existing dial plan, the new 5 digit extensions for West Jefferson would have to start with either 2,3, or 7. Battelle

requires a contiguous block of 2000 numbers which could be drawn from the following ranges: 614-xx2-0000 to 614-xx2-9999, or 614-xx3-0000 to 614-xx3-9999 or 614-xx7-0000 to 614-xx7-9999.

Battelle's existing DIDs are shown next:

Block 0 (0000-0999):

Block 1 (1000-1999):

Block 2 (2000-2999):

Block 3 (3000-3999): 614-424-3000 to 3999

Block 4 (4000-4999): 614-424-4000 to 4999

Block 5 (5000-5999): 614-424-5000 to 5999

Block 6 (6000-6999): 614-424-6100 to 6100

614-424-6102 to 6116

614-424-6118 to 6120

614-424-6122 to 6122

614-424-6124 to 6138

614-424-6140 to 6199

614-424-6300 to 6599

Block 7 (7000-7999): 614-424-7000 to 7999

Block 8 (8000-8999):

Block 9 (9000-9999):

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa R Wellman", with a long horizontal flourish extending to the right.

**Lisa Wellman**

**Battelle Commodity Manager**

Part I A

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TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

Tracking  
Number: 614-  
WJEFFERSON-  
OH-413373  
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- FAX: 908- E-mail: lloper@att.com  
234-7622 234-8044

Pooling Administrator: <sup>ii</sup>

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 <sup>iii</sup> ☐

NPA: 614 LATA: 324 OCN: <sup>iv</sup>  
7532 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 2

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
CLMBOHFQDS2

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup>  
WJEFFERSON  
Rate Center Sub Zone: \_\_\_\_\_

### 1.3 Dates:

Date of Application: <sup>vii</sup> 02/03/2011 Requested Block Effective Date: <sup>viii</sup>  
03/06/2011

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? (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) 614-642-5, 6
- 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<sup>ix</sup> | Switching Id | | Part 1B

OCN:Inter-company<sup>x</sup> | 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](mailto:inc@atis.org) as of the date of this application.

Lisa Loper

Signature of Block Applicant

Manager-Code 02/03/2011  
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 Telcordia<sup>TM</sup> LERG<sup>TM</sup> 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<sup>TM</sup> 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,

MTE Block

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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: 614-WJEFFERSON-OH-413373Date: 02/03/2011OCN: 7532Company Name: TELEPORT COM OHRate Center: WJEFFERSONList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 614-379-9Name of Block Applicant: Lisa LoperSignature: Lisa LoperTitle: Manager-Code AdministrationTelephone No.: 908-234-7622FAX No.: 908-234-8044E-mail: lloper@att.comA. Available Numbers: 689B. Assigned Numbers: 306C. 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 <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>

<u>0</u>	<u>-1</u>	<u>0</u>	<u>-1</u>	<u>0</u>	<u>0</u>
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MTE Block

Page 2 of 2

F. Forecast

- Next 12 months<sup>4</sup>    **1500**    **1**    **0**    **0**    **0**    **1**    **0**    **-1**    **0**    **0**    **0**    **0**

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **250.333**

H. Months

to Exhaust<sup>5</sup>

Numbers Available for Assignment to  
Customers(A)

=

Average Monthly Forecast(G)

Block RequestedAvailable NumbersMonths To Exhaust**1****689****2.752****2****1689****6.747**

I.

Utilization<sup>6</sup>  $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \mathbf{30.6}$

=

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, February 03, 2011 7:50 AM  
**To:** LOPER, LISA A (ATTSI)  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 614-WJEFFERSON-OH-413373

**Pooling Administration System**

Dated 03-February-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 614-WJEFFERSON-  
OH-413373

**Date of Application:** 02/03/2011 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 02/03/2011 **Date of Response:** 02/03/2011

**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

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:

CLMBOHFQDS2

WJEFFERSON

**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.**

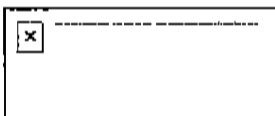
Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<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**

**2/9/2011 2:40:54 PM**

**in**

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

Summary: Request for the Commission to overturn a Neustar Numbering Decision electronically filed by Ms. Mary K. Fenlon on behalf of AT&T Communications of Ohio