

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 INTERNET SERVICES'S REQUEST FOR REVIEW OF A  
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

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SBC Internet Services, Inc. d/b/a AT&T Internet Services ("SBCIS/ATTIS") 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 ATTIS' request for numbering resources, as more fully described herein. This request replaces the request filed in this docket by SBCIS/ATTIS on January 31, 2011.

SBCIS/ATTIS requested NeuStar to assign a new block of numbers for the Cleveland rate center, OCN 516C, for the purpose of establishing a new switch (CLEVOH 02UMD) for its Module 3 project for CVoIP/UVERSE, which will roll out in April 2011. ATTIS is requesting one block of new numbers, preferably NPA/NXX-7.

SBCIS/ATTIS's existing telephone number resources cannot satisfy the needs for future IS customers. Nevertheless, SBCIS/ATTIS's request to obtain the required numbering resources from NeuStar will not be processed because SBCIS/ATTIS does not meet the two required FCC criteria to obtain numbering resources in the Cleveland rate center. The FCC

requires a months-to-exhaust (MTE) of 6 months or fewer. SBCIS/ATTIS is at a 8.10 MTE. In addition, the FCC requires utilization of 75% or higher and AT&T Ohio is at 56.83%. 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." SBCIS/ATTIS 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 SBCIS/ATTIS's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of SBCIS/ATTIS's request.

For the reasons set forth herein, SBCIS/ATTIS respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Cleveland rate center to SBCIS/ATTIS.

Respectfully submitted,

AT&T Internet Services, Inc.

By: /s/ Mary Ryan Fenlon  
Jon F. Kelly (Counsel of Record)  
Mary Ryan Fenlon  
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Room 525  
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501-373-0047  
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February 11, 2011

Re: LRN request for CLEVELAND Rate Center OCN 516C

To Whom It May Concern:

This letter documents our requirements in relation to additional numbering resources for SBC Internet Services, Inc. d/b/a AT&T Internet Services (SBCIS/ATTIS). It is understood that SBCIS/ATTIS may take this request to the State Commission, if needed, to fulfill our request for one block in the Cleveland rate center for a LRN use.

SBCIS/ATTIS is establishing a new switch (CLEVOH02UMD) for our Module 3 project for CVoIP/UVERSE which will roll out in April 2011. We are requesting for one block and we would prefer NPA/NXX-7.

At this time, the Rate Center does not meet the two required FCC criteria to obtain growth resources.

It is imperative that we have these additional numbers to prevent our organization from incurring damages as it relates to customer satisfaction. If more information is needed, please advise.

Thank you in advance,

Teresa Jernigan  
Manager Network Service – Code Administration

### Appendix 3 - Modified August 6, 2001

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

Date: 02/11/11 OCN: 516C Company Name: SBCIS/ATTIS

Rate Center: CLEVELAND

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX (0), NXX-X(3)

Name of Block Applicant: Teresa Jernigan Signature: ON FILE

Title: CODE ADMINISTRATOR Telephone No.: 501-373-0047 FAX No.: 501-373-3716

E-Mail: tj2738@att.com

A. Available Numbers: 1163

B. Assigned Numbers: 1705

C. Total Numbering Resources: 3000

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 <sup>2</sup>	98	12	167	-187	165	51						
F. Forecast – Next 12 months <sup>3</sup>	0	148	148	183	187	195	199	206	216	217	183	165
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): <u>143.5</u>												
H. Months to Exhaust <sup>4</sup>	$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$							=	<u>8.10</u>			
I. Utilization <sup>5</sup>	$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$							* 100	=	<u>56.83</u>		

Explanation: Actual forecast for Month 1 = -111

<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> 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

<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</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, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**December 9, 2005**

**Tracking Number:** 216-CLEVELAND-OH-416699

Type of Application: ☒ New ☐ Change<sup>1</sup> ☐ Delete

## 1.0 GENERAL INFORMATION

### 1.1 Contact Information:

Code Applicant:

Company/Entity Name: SBCIS/ATTIS

Headquarters Address: **2600 CAMINO RAMON**

City, State, Zip: **SAN RAMON, CA 94583**

Contact Name: Teresa Jernigan

Contact Address: 1111 W Capitol Ave, Rm 525

City, State, Zip: , Little Rock, AR 72201

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Phone: **501-373-0047**    Fax: **(501-373-3716**    E-Mail: **Tj2738@att.com**

### Code Administrator<sup>2</sup>:

Name: DIANE CALHOUN

Address: **1800 SUTTER ST., STE 780**

City, State, Zip: **CONCORD, CA 94520**

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Phone: **925-363-7656**      Fax: **925-363-7655**

1.2 NPA: **216** NXX<sup>3</sup>: LATA: **320** OCN<sup>4</sup>: **516C** Parent Company's OCN(s): **0555**

Switching Identification (Switching Entity/POI)<sup>5</sup>: CLEVOH02UMD

Locality/City/Wire Center: Rate Center<sup>6</sup>: **CLEVELAND**

Homing Tandem Operating Co.<sup>7</sup>: **SBCIS/ATTIS**      Tandem Homing CLI<sup>TM 8</sup>: **CLEVOH620GT**

1.3 Dates: Date of Application: **02/11/11** Requested Effective Date<sup>9 10</sup>: **EXPEDITE**

1.4 a). Type of company/entity requesting the code: **CVOIP** (LEC, IC, CMRS, Other)

b). Type of Service **OTHER** \_\_\_\_\_ (e.g., Cellular – Type 2)

c). Code Assignment Preference (Optional)	<b>NPA-NXX-7</b>
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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 Reservation

1.5	Type of Request (Initial, Growth, etc.)	<b>GROWTH</b>
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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.

Pool Indicator<sup>13</sup>: ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☒ Yes ☐ No

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**December 9, 2005**

1.7 Code request for new service (Explain): **NXX REQUEST FOR AN LRN**

- 1.8 ☐ Part 2 attached ☐ Part 2 is not attached for BIRADS<sup>14 15</sup>  
☒ Additional Documentation is attached ☐ Additional Documentation is not attached

Comments: **30 DAY EXPEDITE LETTER ATTACHED**

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 the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/docs.asp>) as of the date of this application.<sup>16</sup>

<u><b>TERESA JERNIGAN</b></u>	<u><b>CODE ADMINISTRATOR</b></u>	<u><b>02/10/2011</b></u>
Signature of Code Applicant	Title	Date

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**December 9, 2005**

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<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 (973-884-8355) 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™ 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™ COMMON LANGUAGE CLLI™ 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>TM</sup> Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

<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™ 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 should not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

<sup>15</sup> WARNING! 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.

<sup>16</sup> An incomplete form may result in delays in processing this request.



**From:** diane.calhoun@neustar.biz  
**Sent:** Friday, February 11, 2011 11:22 AM  
**To:** TOLENTINO, LEILA M (ATTSI)  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 216-CLEVELAND-OH-416699

## Pooling Administration System

Dated 11-February-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 216-CLEVELAND-OH-416699

Date of Application: 02/11/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 02/11/2011 Date of Response: 02/11/2011

Service Provider Name: SBC INTERNET SVCS.  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 516C

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>

**CLEVOH02UMD**

Rate Center:

**CLEVELAND**

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 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**

**2/17/2011 3:29:32 PM**

**in**

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

Summary: Request to Review Decision of Nuestar Numbering Administrator electronically filed by Ms. Mary K. Fenlon on behalf of AT&T Internet Services