

**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)

**CENTURYTEL OF OHIO INC. DBA CENTURLINK
REQUEST FOR REVIEW OF A DECISION OF NEUSTAR - POOLING
ADMINISTRATOR**

CenturyTel of Ohio Inc. d/b/a CenturyLink ("CenturyLink") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") direct NeuStar, the Pooling Administrator ("PA"), to provide CenturyLink with an uncontaminated consecutive thousand number block in the Avon wire center of the Avon Ohio rate center to satisfy the request of CenturyLink customer, Cleveland Clinic located in Cleveland Ohio. Cleveland Clinic has begun construction for a new facility to be located in Avon Ohio and is requesting 700 consecutive numbers for the new facility.

BACKGROUND

Cleveland Clinic contacted CenturyLink requesting a consecutive group of numbers for a new facility under construction located at 33000 Just Imagine Drive, Avon Ohio 44011. They requested consecutive numbers in the 440-695-4XXX, 5XXX or 6XXX range. Any block that begins with 0XXX or 9XXX will not work with this customer's calling plan..

CenturyLink reviewed the customer's request and determined that it did not have the requested consecutive number block available within the Avon rate center.

The original request of Cleveland Clinic was for 500 consecutive numbers and on April 8, 2011 CenturyLink submitted a Thousand Block Application Form – Part 1A to

the PA for the assignment of a consecutive uncontaminated number block necessary to meet Cleveland Clinics needs. A copy of this application is attached. (Exhibit A).

CenturyLink completed the application in accordance with the Thousands Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust ("MTE") Certification, attached. (Exhibit B).

On April 8, 2011, the PA, via the Pooling Administration System ("PAS"), denied the request on the grounds that CenturyLink had not met the rate center-based MTE criteria set forth in the NXX Number (NXX) Pooling Administration Guidelines, notwithstanding the fact that CenturyLink does not have the numbering resources needed to satisfy its customer's request in the switch at issue. This denial of the application received by CenturyLink from the PAS system is attached. (Exhibit C).

On April 12th, 2011 Cleveland Clinic provided a subsequent official request for 700 consecutive numbers on its letterhead (Exhibit D). The original request was for 500 but after further study it was determined that 700 consecutive numbers are needed. There is no need to resubmit the 700 number request as the 500 request was already denied.

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, the PA looks at the number of months-to-exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket states that a carrier "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy specific customer request." Also, paragraph 64 indicates that "States may not accommodate requests for specific numbers (i.e. vanity

numbers), but may grant requests for customers seeking contiguous blocks of numbers." Therefore, this Commission has the authority to review the PA's decision and reverse it when appropriate.

CenturyLink's request to obtain the required numbering resources from NeuStar was not processed because CenturyLink does not meet the two required FCC criteria to obtain numbering resources in the Avon rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. CenturyLink is at a 37,892 MTE due to the low growth forecast and inventory that does not qualify for donation. In addition, the FCC requires utilization of 75% or higher and CenturyLink is at 68.36%. 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:

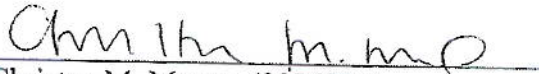
The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an Operating Company Number (OCN). The NANPA must notify 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.

CenturyLink submits that Cleveland Clinic's request constitutes special circumstances and demonstrates a clear requirement that warrants the Commission's review and reversal of NeuStar's decision.

CONCLUSION

CenturyLink respectfully requests that the Commission review and reverse the PA's decision to withhold numbering resources because it violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need. The PA's denial of numbering resources interferes with CenturyLink's ability to serve its customer, Cleveland Clinic. CenturyLink requests expedited treatment of its request due to the urgent needs and the timeline of the customer and that the Commission overturn the PA's decision and instruct it to release the numbering resources necessary to meet the needs of Cleveland Clinic.

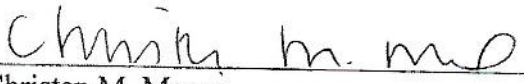
Respectfully submitted,


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*Counsel for CenturyTel of Ohio Inc.
d/b/a CenturyLink*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing Request was served via email to the parties listed below on this 29th day of April, 2011.


Christen M. Moore

Kathy E. Hobbs Alltel Ohio, Inc. 21 E. State Street, Suite 1900 Columbus, OH 43215	Jon F. Kelly AT&T Ohio 150 E. Gay Street, Rm. 4-A Columbus, OH 43215
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James P. Miggins Regulatory Manager GTE Service Corp. HQE02E94 600 Hidden Ridge Irving, TX 75038	Mark Romito Cincinnati Bell Telephone Co. P. O. Box 2301 201 E. Fourth Street Cincinnati, OH 45201
Chris J. Phillips Kalida Telephone Co., Inc. P. O. Box 267 121 E. Main Street Kalida, OH 45853	Stephen K. Vogelmeier COI Long Distance 921 Eastwind Drive, Suite 104 Westerville, OH 43081-5316
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TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 440-AVON-OH-432537
Individual Block Request

Type of Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION**1.1 Contact Information:**Block Applicant:

Company Name: CENTURYTEL OF OHIO, INC. DBA CENTURYLINK
Headquarters Address: 100 CenturyLink Dr
City, State, Zip: Monroe, LA, 71203
Contact Name: Rita Schmitz
Contact Address: 333 N Front Street
City, State, Zip: La Crosse, WI, 54601
Phone: 608-796-5600 FAX: E-mail: Rita.Schmitz@CenturyLink.com

Pooling Administrator: ii

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 iii ☐

NPA: 440 LATA: 320 OCN: ^{iv} 0630 Parent Company's OCN 5775

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v

AVONOHXARS1

City or Wire Center Name : Avon Rate Center: ^{vi} AVON

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 04/08/2011

Requested Block Effective Date: ^{viii} 05/09/2011

☐ 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 : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) 440-695-4, 440-695-5 or 440-695-6

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any 440-695-9 OR ANY BLOCK THAT BEGINS WITH 0XXX OR 9XXX - WILL NOT WORK WITH CUSTOMER'S CALLING PLAN.

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 ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company ^x ☐ 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 as of the date of this application.

Rita Schmitz

Signature of Block Applicant

Coordinator

Plant **04/08/2011**

Operations

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLITM tandem of the facilities based provider^{xi}. 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

- ⁱ Identify the type of 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 CLITM 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 network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 440-AVON-OH-432537

Date: 04/08/2011

OCN:0630

Company Name: CENTURYTEL OF OHIO, INC.
DBA CENTURYLINK

Rate Center: AVON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 440-934-0,1,2,3,4,5,6,7,8,9,440-937-0,1,2,3,4,5,6,7,8,9

Name of Block Applicant: Rita Schmitz

Signature: Rita Schmitz

Title: Coordinator Plant Operations
No.:

No.:

Telephone No.: 608-796-5600

FAX

E-mail: Rita.Schmitz@CenturyLink.com

A. Available Numbers: 6328

B. Assigned Numbers: 13672

C. Total Numbering Resources: 20000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation 2;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 - 0 0 0 0 0 0

Previous 6
months³

F. Forecast
- Next 12
months⁴

1 0 0 0 0 0 0 0 0 0 0 0

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 0.167

H. Months
to Exhaust⁵ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

6328

Months To Exhaust

37892.216

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$

68.36

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

Explanation: Customer needs 500 consecutive numbers for new facility that is opening - we do not have consecutive numbers available.

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 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).

³ 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.

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 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

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

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPA Part 3

Tracking Number : 440-AVON-OH-432537

Date of Application: 04/08/2011 Effective Date: _____
Date of Receipt: 04/08/2011 Date of Response: 04/08/2011

Service Provider Name: CENTURYTEL OF OHIO, INC. DBA CENTURYLINK
(Telcordia™ LERG™
Routing Guide) OCN: 0630

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

Rate Center:

Rate Center Sub Zone:

AVONOHXARS1

AVON

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 CLLITM 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.)



April 12, 2011

Ms. Jan Woch
CenturyLink
203 West 9th Street
Lorain, OH, 44052

Dear Jan,

It is my understanding from your email dated 3/17/2011 that you do not have consecutive blocks of numbers for my request of 700 DID numbers for our new facility located at 33000 Just Imagine Drive, Avon, OH 44011.

It is imperative that we have consecutive numbers in order to incorporate this new site into our Cleveland Clinic numbering plan. We cannot have 9XXX or 0XXX numbers as part of the DID block as this conflicts with dialing "9" for outbound calls and with dialing "0" to reach the operator.

I am being pressured for the new phone numbers for this site. We will be opening this new facility in November/December of this year, but our marketing department needs to begin sending out correspondence to patients informing them of the new telephone numbers.

I would appreciate anything that you can do to expedite this request.

Please let me know if you need any additional information from me to expedite this request.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Larry Klinec'.

Larry Klinec
Telecom Systems Engineer
Cleveland Clinic
18101 Lorain Road
Cleveland, OH 44111
Tel: 216-476-7415
lakin@ccf.org

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/29/2011 10:28:33 AM

in

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

Summary: Request for review of decision of Nuestar - Pooling Administrator electronically filed by Gary Baki on behalf of CenturyTel of Ohio dba CenturyLink