

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission)	
Investigation into Telephone Numbering)	Case No. 10-884-TP-UNC
and Number Assignment Procedures)	

**REQUEST OF FRONTIER NORTH INC. TO REVIEW DECISION OF THE
NEUSTAR POOLING ADMINISTRATOR**

Frontier North Inc. (“Frontier”) requests that the Commission reverse a decision of the NeuStar Pooling Administrator (“NeuStar”) denying access to numbers for one of Frontier’s customers. Frontier seeks this relief because there is a verifiable customer need for the numbers. On October 28, 2011, Frontier requested that NeuStar assign 2000 sequential direct inward dial (“DID”) telephone numbers for CITI (“CITI”). The numbers are needed as part of CITI’s expansion of its current telecommunications system at its Data Center located in the Delaware rate center. This expansion will allow CITI to accommodate additional call center traffic through this Data Center.

Frontier submitted the numbering request to NeuStar because Frontier does not have the requested 2000 sequential DID numbers that CITI needs in the Delaware rate center. On October 28, 2011, NeuStar denied the request for the CITI numbers on the grounds that Frontier did not meet the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines.

The FCC’s rules set forth a procedure to bring the denial of a numbering resource by NeuStar to the appropriate state commission for review. 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 a carrier: "...should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." In addition, paragraph 64 says "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." *Id.*

The CITI request is consistent with paragraph 64 of the FCC order that empowers state commissions to grant customer requests seeking contiguous blocks of numbers. *Id.* Attached to this request are copies of Frontier's Thousand Block Application Forms (Attachment A), the Months-to-Exhaust Worksheet (Attachment B), a copy of the denial received from NeuStar (Attachment C) and a copy of the request from CITI (Attachment D).

In addition, Frontier has reacted in a timely manner to the customer's needs and believes the request for Commission intervention at this point is reasonable considering the customer's projected need.

For the reasons set forth herein, Frontier requests that the Commission expeditiously overturn the NeuStar decision to withhold the numbering resource that Frontier requested and grant the 2000 sequential DID numbers to meet its customer's needs.

Respectfully submitted

FRONTIER NORTH INC.

By: /s/ Carolyn S. Flahive

Carolyn S. Flahive
THOMPSON HINE LLP
41 South High Street, Suite 1700
Columbus, Ohio 43215-6101
(614) 469-3294

Attachment A

Application Form to NeuStar

**Thousands-Block Application Form
Part1A**

Type of Application (check one):

☒ New☐ Change☐ Delete**GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: FRONTIER NORTH, INC. - OH

Headquarters Address:

3 High Ridge Park City: Stamford State: Connecticut Zip: 06905Contact Name: JONNA IRESON

Contact Address:

2200 AIRFIELD DR FTD02A31 City: DFW AIRPORT State: TX Zip: 75261Phone: 972-456-2029Fax: 972-456-0152E-Mail: jonna.s.ireson@FTR.com**Pooling Administratorⁱⁱ:**Contact Name: Tara Farquhar

Contact Address:

1800 Sutter St. Suite 570 City: Concord State: CA Zip: 94520Phone: 925-363-7654Fax: 925-363-7695E-Mail: tara.farquhar@neustar.biz**1.2 General Information:**Check one: No LRN needed ☒ LRN neededⁱⁱⁱ ☐NPA: 740 Lata: 324 OCN^{iv}: 0615 Parent Company's OCNNumber of Thousand Blocks Requested: 2Switch Identification (Switching Entity/POI)^v: DLWROHXADS0 City or Wire Center Name: DELAWARERate Center^{vi}: DELAWARE Rate Center Sub Zone:**1.3 Dates**Date of Application^{vii}: 10/27/2011 Requested Block Effective Date^{viii}: 1/5/2012Request Expedited Treatment? (See Section 8.6) Yes ☐ No ☒**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: Wireline

c) Thousands-Block(s) (NXX-X) assignment preference (optional)

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any can not have 0,9 blocks

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)

Tracking Number : OHW0002088

TBPAG Attachment 1- March 19, 2007

ATIS-0300066.at1

**Thousands-Block Application Form
Part1A**

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 ☒ , If Yes, attach months to exhaust worksheet

Change block: Yes ☐ , If Yes, indicate NPA-NXX-X, type of and reason for change:

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

DOMA TRESOR
Signature of Block Applicant

Code Administrator
Title

10/27/2011
Date

**Thousands-Block Application Form
Part1A**

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™ LERG™ 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™ 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 CLLI™ tandem of the facilities based provider^{1A}. 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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Thousands-Block Application Form
Part1A**

Foot Notes:

ⁱ Identify type of and reason for 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 CLLI™ code of the switch /POL.

^{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 PSTN prior to the effective date of the block(s).

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

Attachment B

Months-to-Exhaust Worksheet

☒ Frontier

Verizon Code Administration System

Time left before SSO Logout: 59:51

Welcome JONNA IRESON Logout Last Login: 10-28-2011 11:41:21 am

☒ Navigation ☒ NRUP ☒ Reports ☒ NPA/NXX Search ☒

Months To Exhaust (Block)

Request: Date: OCN: Company:

Rate Center:

Applicant: <input type="text" value="IRESON JONNA"/>	Title: <input type="text"/>
Address: <input type="text" value="2200 AIRFIELD DR FTD02A31"/>	
City: <input type="text" value="DFW AIRPORT"/>	State: <input type="text" value="TX"/> Zip: <input type="text" value="76281"/>
Phone: <input type="text" value="972-456-2029"/>	Fax: <input type="text" value="972-456-0162"/> Email: <input type="text" value="jonna.s.ireson@FTR.com"/>

A. Available Numbers:

B. Assigned Numbers:

C. Total Number Rsrcs:

D. Quantity activated in past 90 days excluded from utilization calculation:

List excluded Code(s) or Block (s):

E. Previous 6 months:

1 <input type="text" value="89"/>	2 <input type="text" value="47"/>	3 <input type="text" value="66"/>	4 <input type="text" value="74"/>	5 <input type="text" value="124"/>	6 <input type="text" value="109"/>
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F. Forecast Months:

1 <input type="text" value="317"/>	2 <input type="text" value="54"/>	3 <input type="text" value="86"/>	4 <input type="text" value="35"/>	5 <input type="text" value="44"/>	6 <input type="text" value="21"/>
7 <input type="text" value="33"/>	8 <input type="text" value="49"/>	9 <input type="text" value="5"/>	10 <input type="text" value="6"/>	11 <input type="text" value="22"/>	12 <input type="text" value="21"/>

G. Average Monthly Forecast:

H. Months to Exhaust:

I. Utilization Level:

Explanation:

NPA/NXXs Included in Growth:

740-363-8, 740-203-6, 740-362-1, 740-363-5, 740-369-1, 5, 740-834-2, 740-203-5, 740-362-0, 7, 740-363-0, 4, 7, 740-369-9, 740-834-7, 740-363-2, 740-368-1, 2, 3, 4, 740-369-2, 6, 8, 740-834-8, 740-203-4, 740-362-2, 5, 740-363-9, 740-368-9, 740-369-4, 740-833-8, 740-362-4, 8, 9, 740-363-6, 740-368-6, 7, 740-369-0, 7, 740-833-1, 740-834-1, 3, 5, 740-362-3, 740-

[Save](#) [Cancel](#) [Print](#) [Refresh](#) [Clear](#) [Part 1A](#) [Part 1B](#)

Attachment C

Denial for Block of Numbers by
NeuStar

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 740-DELAWARE-
OH-491880

Date of Application: 10/28/2011 Effective Date: _____
Date of Receipt: 10/28/2011 Date of Response: 10/28/2011

Service Provider Name: FRONTIER NORTH, INC. - OH
(Telcordia TM LERG TM
Routing Guide) OCN: 0615

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Zack Jones Phone: 925-363-7653
Signature of Pooling Administrator
Zack Jones Fax: 925-363-7686
Name (print)
Email: zack.jones@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 DLWROHXADS0
Rate Center: DELAWARE
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 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 CLLI TM 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.)

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 740-DELAWARE-
OH-491880

Date of Application: 10/28/2011 Effective Date: _____
Date of Receipt: 10/28/2011 Date of Response: 10/28/2011

Service Provider Name: FRONTIER NORTH, INC. - OH
(Telcordia TM LERG TM Routing Guide) OCN: 0615

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Zack Jones Phone: 925-363-7653
Signature of Pooling Administrator
Zack Jones Fax: 925-363-7686
Name (print)
Email: zack.jones@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 DLWROHXADS0
Rate Center: DELAWARE
Rate Center Sub Zone: _____

☒ **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 CLLI TM 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.)

Attachment D

Customer

Request Letter

11/8/11

3800 Citigroup Center
Tampa, FL 33610

Citi is in the process of making changes to expand its telecommunications system located in the Data Center in the Delaware OH rate center. Currently, the Data Center handles traffic from several call centers within the U.S. and in Europe and Citi is expanding the capacity of the Data Center to accommodate additional call center traffic. Citi has used all of its previously granted numbering resources. In order to accommodate expansion of the Data Center, Citi requires an additional 2000 sequential numbers from Frontier. Sequential numbers are needed to be compatible with the existing systems and for ease of provisioning and maintenance. The current request for 2000 numbers will accommodate an immediate request to Frontier to be provisioned as soon as possible.

Question #1.

What amount of numbering resources are needed by the customer in the next 12 months?

- a) How will the TNs be used? New Call Center inbound/outbound

Question #2.

Does the customer currently have numbering resources?

If so,

- a) What amount of numbering resources does it already have?

365-6000 thru 6999
740 834-5000 THRU 5999
740-657-8380 - 740 657-8399
740 834-4000 THRU 4999

- b) Are they in the same rate centers? NO, 740-657-8380 - 740 657-8399 are native to Cheshire and the other are native to Delaware. New numbers need to be native to the Delaware CO which is ACC B14.

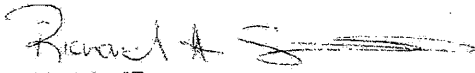
- c) Are they from the same service provider? Yes

- d) Will these resources be returned after receiving the new numbering resources? NO they are all needed

- e) If the customer will be returning the numbering resources, will they be returned within 6 months? N/A

Question #3.

What kind of dialing pattern does the customer currently have? Several PRI's with 2 way voice



Rich Stokes, VP
CTI NA Regional Delivery and Integration
813-604-0009 - Office
813-343-6251 - Fax

This foregoing document was electronically filed with the Public Utilities

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11/8/2011 3:14:55 PM

in

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

Summary: Request to Review Decision of the Neustar Pooling Administrator electronically filed by Carolyn S Flahive on behalf of Frontier North Inc.