

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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**tw telecom of ohio llc REQUEST FOR REVIEW OF A DECISION  
OF NEUSTAR – POOLING ADMINISTRATOR**

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**tw telecom of ohio llc** (“TWTC”) requests that the Public Utilities Commission of Ohio (“Commission”) reverse a decision of the NeuStar Pooling Administrator (“NeuStar”) denying access to numbers for a TWTC customer. TWTC seeks this relief because there is a verifiable customer need for the numbers. On November 22, 2011, TWTC requested that NeuStar assign 2000 sequential direct inward dial (“DID”) telephone numbers for Wright Patterson Air Force Base (“Wright Patterson”).

TWTC submitted the numbering request to NeuStar because TWTC does not have the requested 2000 sequential DID numbers that Wright Patterson requires in the Dayton rate center. On November 22, 2011, NeuStar denied TWTC’s request for the Wright Patterson numbers on the grounds that TWTC 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 Wright Patterson 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 TWTC’s Thousand Block Application Form (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 Wright Patterson (Attachment D).

In addition, TWTC 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.

Wright Patterson has three switches that serve two geographic areas, and its goal, as explained in Wright Patterson’s request (Attachment D), is to “migrate the current TDM voice architecture towards IP and reduce the legacy voice systems inventory by 2016.” To do so will require the migration of lines from one switch to another. Wright Patterson plans to turn in unused groups of 1000 numbers as it proceeds with the migration. Wright Patterson further explains that, “Due to the complexity of the numbering plan, the migration of lines from the Area B switch to the Area A switch will be extremely time consuming. Significant improvements could be made with new numbers being provided to allow the migration of the lines easier.” The numbers are needed as part of Wright Patterson’s expansion of its current telecommunications system at its Data Center located in the Dayton rate center. This expansion will allow Wright Patterson to accommodate additional call center traffic through this Data Center.

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

Respectfully submitted on behalf of,  
**tw telecom of ohio llc**



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BRICKER & ECKLER LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-2335  
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## TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

**Tracking  
Number:** 937-DAYTON-  
OH-499191  
Full NXX: Pool  
Replenishment

**Type of  
Application:** ☒ New ☐ Change ☐ Disconnect  
i

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

Company  
Name: TW TELECOM OF OHIO LLC - OH

Headquarters  
Address: 5700 S. Quebec St

City, State,  
Zip: Greenwood Village, CO, 80111

Contact  
Name: Maria Gonzales

Contact  
Address: 5700 S. Quebec St

City,State,Zip: Greenwood Village , CO , 80111

Phone: 303-  
542-4415 FAX:            E-mail: Maria.Gonzales@twtelecom.com

Pooling Administrator: ii

Contact  
Name: Zack Jones

Contact  
Address: 1800 Sutter St

City,State,Zip: Concord ,CA,94520

Phone: 925-363-7653 FAX: 925-363-7686

E-mail: zack.jones@neustar.biz

**1.2 General Information:**

**Check one : No LRN needed ☒ LRN needed ☐ iii**

NPA: 937 LATA: 328 OCN: <sup>iv</sup> 7460 Parent Company's OCN 7178

Number of Thousands-Blocks Requested : 2

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

DYTNOHKTDS1

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup> DAYTON

Rate Center Sub Zone: \_\_\_\_\_

### 1.3 Dates:

Date of Application: <sup>vii</sup> 11/22/2011 Requested Block Effective Date: <sup>viii</sup> 01/27/2012

☐ 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) tw  
would prefer a 1, 3 or 9 as the last digit of the NXX so NX1, NX3 or NX9. We  
would like either 937-701, 937-519 or 937-563. 937-xxx-7, 937-xxx-8
- 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) N/A

### 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: **Please provide us with 937-701, 937-563 or 937-519. This is for the customer who needs it for their dialing plan**

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.

**Maria Gonzales**

**Signature of Block Applicant**

**Network**

**Code**

**Administrator**

**Title**

**11/22/2011**

**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, homing tandem and CLLI<sup>TM</sup> tandem of the facilities based provider <sup>xi</sup>. 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 :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</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 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).

<sup>v</sup> 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<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLI are trademarks of Telcordia Technologies, Inc.

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: **937-DAYTON-OH-499191**Date: **11/22/2011**OCN: **7460**Company Name: **TW TELECOM OF OHIO  
LLC - OH**Rate Center: **DAYTON**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):**937 255 0000-9999 937 257 0000-9999 937 656 0000-9999 937 904 0000-9999 937 522 2000-4999,6000-9999 937 531 0000-7999 937 531 8000-9999 937 395 6000-6999 937 219 2000-2999 937 369 2000-2999 937 396 3000-3999 937 528 3000-5999 937 401 6000-7999 937 245 6000-8999 937 723 3000-5999 937 528 8000-8999 937 938 2000-4999 937 781 5000-5999 937 487 0000-9999 937 723 2000-2999 937 558 3000-4999**

Name of Block Applicant: **Maria Gonzales**Signature: **Maria Gonzales**Title: **Network Code Administrator**Telephone No.: **303-542-4415**

FAX

No.:

E-mail: **Maria.Gonzales@twtelecom.com**A. Available Numbers: **4538**B. Assigned Numbers: **95462**C. Total Numbering Resources: **100000**

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>

<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>
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F. Forecast - Next 12 months<sup>4</sup>

<b><u>2000</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>	<b><u>500</u></b>
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):**750.0**

H. Months to Exhaust<sup>5</sup>

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

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>4538</b>	<b>6.051</b>
<b>2</b>	<b>5538</b>	<b>7.384</b>

I. Utilization<sup>6</sup>

$$= \frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \mathbf{95.462}$$

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))

**From:** zack.jones@neustar.biz [mailto:zack.jones@neustar.biz]

**Sent:** Tuesday, November 22, 2011 6:35 AM

**To:** Gonzales, Maria; Musquiz, Josefina; Pease, Tom

**Cc:** PA\_Part3@neustar.biz

**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 937-DAYTON-OH-499191

## Pooling Administration System

Dated 22-November-2011

November 21, 2003

Attachment 3

ATIS-0300066.at3

### Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 937-DAYTON-OH-499191

Date of Application: 11/22/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 11/22/2011 Date of Response: 11/22/2011

Service Provider Name: TW TELECOM OF OHIO LLC - OH  
(Telcordia™ LERG™  
Routing Guide ) OCN: 7460

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): <sup>1</sup>

**DYTNOHKTDS1**

Rate Center:

**DAYTON**

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.)



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**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 38TH CYBERSPACE ENGINEERING GROUP (AFSPC)  
TINKER AIR FORCE BASE OKLAHOMA**

MEMORANDUM FOR: MR. DON KENNEDY  
TW TELECOM HOLDINGS INC  
10475 PARK MEADOWS DR  
LITTLETON CO 80124-5433

FROM: 38 CEG/PKK  
4064 Hilltop Rd  
Tinker AFB OK 73145-2713

SUBJECT: Request for Assistance, Wright-Patterson AFB OH, CSA FA8773-08-C-0083

1. Wright-Patterson AFB is geographically separated in to 2 areas (Area A and Area B). Area B has one TDM (MSL-100) switch and one remote (from the Area B switch) TDM switch. Area A has one MSL-100/CS-2100 switch which employs both TDM and Voice over Internet Protocol (VOIP). Of which will be the primary telephone service technology at Wright-Patterson AFB.
2. There are approximately 24,000 wired and equipped lines on the Area A switch and 24,000 wired and equipped lines on the Area B switch.
3. The dial plan for Wright-Patterson is as follows:

Area A: 222-2000 to 2999 (Internal to W-P for Hot Lines)  
257-0000 to 9999  
333-0000 to 1999 (Internal to W-P for Direct Dial Lines)  
522-2000 to 4999 and 6000 to 6999  
528-8000 to 8999 (VoIP only)  
656-0000 to 3999  
656-8000 to 8999  
904-0000 to 3999  
Area B: 223-3000 to 3999 (Internal to W-P for Hot Lines)  
223-5000 to 5999 (Internal to W-P for Direct Dial Lines)  
255-0000 to 9999  
656-4000 to 7999 and 9000 to 9999  
904-4000 to 9999  
938-2000 to 4999 (VoIP only)

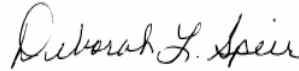
The Area B subscribers service will require cutover to the Area A switch.

4. Due to the complexity of the numbering plan, the migration of lines from the Area B switch to the Area A switch will be extremely time consuming. Significant improvements could be made with new numbers being provided to allow the migration of the lines easier. Part of our plan is to migrate the numbers over in a way that allows us to turn in unused groups of 1000.
5. The goal of the Air Force is to migrate the current TDM voice architecture towards IP and reduce the legacy voice systems inventory by 2016.
6. Wright-Patterson AFB will be requesting 2000 new numbers and are requesting that the numbers be in blocks of 1000 (consecutively). Any new NNX with the third digit ending with something we already

have would require us to use a 7 digit dial plan rather than the 5 digit plan we have today. As an example, we have all 10000 255 numbers. If we were to get 245 as a new prefix than we would have to reprogram the switch so that all employees would have to dial 7 digits rather than 5.

7. Request you advise the possibility of obtaining 2000 new numbers, with two blocks of 1000 consecutive numbers within our existing blocks of numbers. When it is determined that the numbers are/are not available, a modification will be issued to the existing CSA, FA8773-08-C-0083, and an actual work order will be issued authorizing your company to proceed. Please be advised that this letter does not constitute a work order to order the numbers at this time.

8. If you have any questions, please contact Debbie Speir, (405) 734-1402 or [Debbie.Speir@tinker.af.mil](mailto:Debbie.Speir@tinker.af.mil).

A handwritten signature in cursive script, reading "Deborah L. Speir".

DEBORAH L. SPEIR  
Contracting Officer

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**11/30/2011 2:39:01 PM**

**in**

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

Summary: Request for Review of a Decision of NeuStar Pooling Administrator electronically filed by Teresa Orahod on behalf of tw telecom of ohio llc