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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

2011 DEC 22 PM 12:15

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

PUCO

**REQUEST OF CHILlicothe TELEPHONE COMPANY TO REVIEW
DECISION OF THE NEUSTAR POOLING ADMINISTRATOR**

Chillicothe Telephone Company (CTC) requests that the Public Utilities Commission of Ohio (Commission) reverse a decision of the NeuStar Pooling Administrator (NeuStar) denying access to numbers for a CTC customer. CTC seeks this relief because there is a verifiable customer need for the numbers. On April 28, 2011, CTC requested that NeuStar assign 10,000 sequential direct inward dial (DID) telephone numbers for Adena Health System (AHS).

CTC submitted the number request to NeuStar because CTC does not have the requested 10,000 sequential DID numbers that AHS needs in the Chillicothe rate center. On April 28, 2011, NeuStar denied CTC's request for the AHS numbers on the grounds that CTC 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 CC Docket No. 99-200, FCC No. 01-362, at paragraph 64, states that a carrier "should be able to get additional numbering resources when there is verifiable need due to the carrier's inability to satisfy a specific customer request." In addition, "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." *Id.*

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The AHS request is consistent with paragraph 64 of the FCC order that empowers state commissions to grant customer requests seeking contiguous blocks of numbers. Attached to this request are copies of CTC'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 AHS (Attachment D).

In addition, CTC 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.

AHS is a rural healthcare system serving Ross County, and ten (10) surrounding counties. AHS is expanding its clinical services and locations in South Central Ohio and the long range plan for its current DID ranges are insufficient. AHS requested a block of 10,000 numbers in the 779 NNX/exchange for the Adena Regional Medical Center to ensure continuance of its current five-digit dialing to all of its locations.

For the reasons set forth herein, CTC requests that the Commission expeditiously overturn the NeuStar decision to withhold the numbering resource that CTC requested and grant the 10,000 sequential DID numbers to meet its customer's needs.

Respectfully submitted,


Andrew C. Emerson
PORTER WRIGHT MORRIS & ARTHUR LLP
41 South High Street
Columbus, Ohio 43215
Tel: (614) 227-2104
Email: aemerson@porterwright.com

Attorney for Chillicothe Telephone
Company

Attachment A

CTC's Thousand Block Application Form

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking
Number: 740-
CHILLICOTH-OH-
438378
Full NXX:
Dedicated
Customer

Type of
Application: ☒ New ☐ Change ☐
i Disconnect

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

Company
Name: CHILLICOTHE TELEPHONE CO.

Headquarters
Address: 68 E MAIN ST.

City, State,
Zip: CHILLICOTHE, OH, 45601

Contact
Name: JEFF BLEVINS

Contact
Address: 68 E MAIN ST.

City, State, Zip: CHILLICOTHE, OH, 45601

Phone: 740- FAX: - E-mail: jeff.blevins@horizontel.com
772-8327

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 X LRN needed ⁱⁱⁱ

NPA: 740 LATA: 324 OCN: ^{iv} 0597 Parent Company's OCN 0597

Number of Thousands-Blocks Requested : 10

Switching Identification(Switch Entity/POI) : ^v
 CHLCOHXA77G

City or Wire Center Name : Rate Center: ^{vi} CHILLICOTH

Rate Center Sub Zone:

1.3 Dates:

Date of Application: ^{vii} 04/28/2011 Requested Block Effective Date: ^{viii} 07/03/2011

☐ 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) Requesting 740-799
- 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 ^{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.

JEFF BLEVINS

Signature of Block Applicant

ACCESS/COMPENSATION **04/28/2011**
ANALYST

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 CLLITM 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 CLLITM 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.

Attachment B

Months-to-Exhaust Worksheet

Appendix 3

May 16, 2008

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

Tracking Number: **740-CHILLICOTH-OH-438378**Date: **04/28/2011**OCN: **0597**Company Name: **CHILLICOTHE TELEPHONE CO.**Rate Center: **CHILLICOTH**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **740-702 740-772 740-773 740-774**
740-775 740-779 740-542-3 740-542-4 740-542-5 740-542-6 740-542-7 740-542-8 740-637-6

Name of Block Applicant: **JEFF BLEVINS**Signature: **JEFF BLEVINS**Title: **ACCESS/COMPENSATION ANALYST**Telephone No.: **740-772-8327**

FAX No.:

E-mail: **jeff.blevins@horizontel.com**A. Available Numbers: **31475**B. Assigned Numbers: **35525**C. Total Numbering Resources: **67000**

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 **36553 36328 36136 35930 35743 35525**
History -

Previous 6
months³

F. Forecast
- Next 12
months⁴

0 4000 3000 3000 0 0 0 0 0 0 0 0

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 1666.667

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

Block Requested
1

Available Numbers
31475

Months To Exhaust
18.885

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

53.022

Explanation: _____

¹A 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.

²Quantity 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).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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)).

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

Attachment C

Denial for Blocks of Numbers by NeuStar

Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 740-CHILLICOTH-OH-438378

Date: Thursday, April 28, 2011 12:23 PM

From: diane.calhoun@neustar.biz <diane.calhoun@neustar.biz>

To: Blevins, Jeff Jeff.Blevins@Horizontel.com

Cc: 'PA_Part3@neustar.biz' PA_Part3@neustar.biz

Conversation: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 740-CHILLICOTH-OH-438378

Pooling Administration System

Dated 28-April-2011

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 740-CHILLICOTH-OH-438378

Date of Application: 04/28/2011 **Effective Date:** _____
Date of Receipt: 04/28/2011 **Date of Response:** 04/28/2011

Service Provider Name: CHILLICOTHE TELEPHONE CO.
(Telcordia TM LERG TM Routing Guide) **OCN:** 0597

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	CHLCOHXA77G
Rate Center:	CHILLICOTH
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:

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.)

neustar

Attachment D

Request Letter from AHS



Health System

Adena Health System
Information Technology
272 Hospital Road
Chillicothe Ohio 45601

Horizon Chillicothe Telephone
68 East Main Street
Chillicothe, Ohio 45601

To Horizon Communications,

This letter documents our requirement in relation to additional numbering resources. It is understood that Horizon may take this request to the state commission, if needed, to fulfill our request. Horizon Chillicothe Telephone is and has been our primary provider of our phone service for 70+ years.

Adena Health System, with Corporate Offices at Adena Regional Medical Center, is a rural Healthcare system that provides healthcare services to Ross County, and the ten (10) surrounding counties. Adena Health System is continually expanding their clinical services and locations in South Central Ohio. In the past several years we have added 2 Medical Office Buildings, Surgery Center, 2 Critical Access Hospitals and 3 Health Care centers. We have voice and data at all these locations. Our Network has grown significantly in the past six (6) years.

It is apparent that the long range plan for the current DID ranges are insufficient. Adena Health System has 20 locations with phone service. AHS is opening a new Cancer Center, two WalMart Locations, acquisition of Pike Community hospital, and five (5) floors for patient care. Our immediate plans call for numerous other projects through 2014, including 3 new building on the main campus, and a massive mobile deployment of voip and video with over 5000 handheld and video conference voip devices which will require did numbers. We are also planning a massive voip rollout to replace our existing pbx environment which will require us also to have migration numbers available to be successful and to allow for further growth beyond what is listed above.

Our network is designed so that all sites have internal 5 digit dialing to all locations. Currently we have the 779 - 4000's -7000's and 8000' numbers, and several separate blocks of 100 in the 5000's. We also have a 100 block in the 702 nxx/exchange. We are requesting a block of 10,000 numbers in the same nxx/exchange. This would allow us to keep our 5 digit dialing. The new exchange would be installed at the Adena Regional Medical Center and disbursed when required.

Thank you for your attention in this matter.

Brian Young
Manager Infrastructure
bryoung@adena.org
740-779-7107