



221 E. Fourth St.  
P.O. Box 2301  
Cincinnati, Ohio 45201-2301

January 6, 2012

Ms. Renee Jenkins  
Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, Ohio 43215

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests and Other Number Resource Related Filings, PUCO Case No. 10-0884-TP-UNC

Dear Ms. Jenkins:

Accompanying this letter is a Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition is being filed electronically in PDF format. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-6671.

Sincerely,

A handwritten signature in blue ink that reads "Patricia L. Rupich".

Patricia L. Rupich

cc: Dan Fullin (via e-mail)  
Lori Sternisha (via e-mail)

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Commission's</b>	)	<b>Case No. 10-884-TP-UNC</b>
<b>Consideration of Telephone Safety Valve</b>	)	
<b>Requests and Other Number Resource</b>	)	
<b>Related Filings</b>	)	

**PETITION OF CINCINNATI BELL TELEPHONE COMPANY LLC  
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

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Cincinnati Bell Telephone Company LLC (“CBT”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBT request for numbering resources. On January 5, 2012, CBT filed a request with the PA for an NXX in the Cincinnati rate center to establish a Location Routing Number (“LRN”) for a new soft switch that it is deploying. CBT’s request was denied on the grounds that CBT has not satisfied the utilization level and months-to-exhaust (“MTE”) criteria established by the Federal Communications Commission and outlined in the Central Office Code Assignment Guidelines (“COCAG”).<sup>1</sup> Under the federal numbering rules, a state commission may overturn the PA’s decision based on its determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.<sup>2</sup> For the reasons set forth below, CBT submits that the Commission is justified in overturning the PA’s decision and granting CBT’s request for a new NXX to establish an LRN for its new switch.

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<sup>1</sup> 47 CFR 52.15(g)(3)(iii); 47 CFR 52.15(h); *Central Office Code (NXX) Assignment Guidelines (COCAG)*, ATIS-0300051, Alliance for Telecommunications Industry Solutions (November 11, 2011), Section 4.3.1.

<sup>2</sup> 47 CFR 52.15(g)(4). Also, see *COCAG*, Section 4.1.3.

The new soft switch is being deployed to supplement and eventually replace an existing soft switch that is nearing capacity. The new switch will be used to provide state of the art voice telephony and broadband services. Although CBT will eventually decommission its existing soft switch and transition its subscribers to this new switch, the move will not be a flash cut from one switch to the other. Instead, CBT initially will place new subscribers on the new switch and anticipates transitioning subscribers from its existing soft switch over 12 months beginning July 2012. Because the two switches will be deployed simultaneously for at least 15 months, CBT requires a unique LRN for the new switch.<sup>3</sup>

Receipt of the new LRN in a timely manner is imperative since CBT forecasts that capacity on the existing soft switch will exhaust by April 2012. Because the COCAG require a 66-day interval before activation of a new NXX,<sup>4</sup> CBT requires the new code assignment by the end of January 2012 in order to have the new switch ready before capacity on the existing switch exhausts.

Due to the specific requirements for LRN assignment,<sup>5</sup> none of CBT's existing numbers can be used as an LRN. Upon receipt of the new NXX, CBT will keep the "0" thousand-block and return the remaining blocks to the number pool. CBT will be able to port numbers from its existing numbering resources to the new switch once an LRN is assigned for the switch, so it does not anticipate the need for additional numbering

---

<sup>3</sup> A Location Routing Number is the ten-digit (NPA-NXX-XXXX) number assigned to a switch and is used for routing in a local number portability environment. An LRN is required for each LATA served by the switch.

<sup>4</sup> COCAG, Section 6.1.2.

<sup>5</sup> See, *Location Routing Number (LRN) Assignment Practices*, ATIS-0300065, Alliance for Telecommunications Industry Solutions, (September 30, 2011).

resources for this switch beyond this initial request. All of the numbers assigned to the existing soft switch will be ported to the new switch when the old switch is retired.

As shown on the attached Pooling Administration System Worksheet (Attachment A), CBT's January 5, 2012 application was denied because CBT does not satisfy the utilization and MTE criteria for receipt of growth numbering resources.

CBT requests that the Commission overturn the PA's decision and direct the PA to grant CBT's request for a new NXX in the Cincinnati rate center to establish an LRN so that CBT can proceed with deployment of its new switch. In addition, CBT asks that the Commission expedite its consideration of this request so that CBT can turn up service in the new switch by April 2012.

Respectfully submitted,

/s/ Douglas E. Hart

Douglas E. Hart (0005600)  
441 Vine Street, Suite 4192  
Cincinnati, Ohio 45202  
(513) 621-6709  
(513) 621-6981 fax  
[dhart@douglasshart.com](mailto:dhart@douglasshart.com)

Attorney for Cincinnati Bell Telephone  
Company LLC

January 6, 2012














# **ATTACHMENT A**

# Pooling Administration System

 denise.cozad@cinbell.com (SP)

[Sign Ou](#)

Time : 01/05/2012 02:52:58 PM EST

-  Individual Block Requests
-  CO/NXX Code Requests
  -  New Code Request
  -  Code Modification
  -  Code Disconnect
  -  Copy Code Request
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

## Request Resources

States \* OHIO

NPA \* 513

Rate Center \* CINCINNATI

OCN \* 9348-CINCINNATI BELL, INC.

Type of Application: Full NXX for LRN

Request Blocks to be Assigned

☒ 0 ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9

If requesting more than one blocks, do you want multiple effective dates? \* ☐ Yes ☒ No

If requesting more than one block, do you want multiple switches? \* ☐ Yes ☒ No

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## Pooling Administration System

denise.cozad@cinbell.com (SP)

Sign Out

Time : 01/05/2012 02:53:13 PM EST

Part1/1A

Type of  
Application: New Code

View Pool Replenishment Status

## 1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

## Code/Block Applicant:

Company/Entity Name CINCINNATI BELL, INC.  
Headquarters Address 201 E 4th Street  
City Cincinnati  
State OH  
Zip 45202

Contact Name Denise S Cozad  
Contact Address 209 E4th Street, 121-1075  
City Cincinnati  
State OH  
Zip 45202  
Contact Phone 513-566-4130  
Contact Fax 513-651-9089  
Email denise.cozad@cinbell.com

Pooling Administrator<sup>1</sup>:

Name Zack Jones  
Address 1800 Sutter St  
City Concord  
State CA  
Zip 94520  
Telephone 925-363-7653  
Fax 925-363-7686  
Email zack.jones@neustar.biz

Code Administrator<sup>2</sup>:

Name Michael Ortega  
Address 46000 Center Oak Plaza  
City Sterling  
State VA  
Zip 20166  
Phone 571-434-5348  
Fax 571-434-5502

## 1.2 General Information

LRN Needed<sup>3</sup> YES

NPA 513

NXX<sup>3</sup>LATA<sup>3</sup> 922OCN<sup>4</sup> 9348-CINCINNATI BELL, INC.Parent Company  
OCN<sup>4</sup> NONENumber of  
Thousands-Blocks 1  
RequestedLocality/City/Wire  
Center

Switch Identification  
(Switching Identity/POI) Code <sup>v,5\*</sup> EVDLOHEVPS0

Rate Center <sup>vi,8</sup> CINCINNATI

Rate Center Sub  
Zone

Homing Tandem  
Operating Company <sup>7</sup> CINCINNATI BELL TELEPHONE INC

Homing Tandem  
CLLI <sup>8</sup> CNCNOHWS20W

### 1.3 Dates

Date of  
Application <sup>vii</sup> 01/05/2012

Requested  
Effective date 03/11/2012 MM/DD/YYYY  
Code <sup>viii,9,10\*</sup>

☒ 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.

Requested  
Expedited ☒ Yes ☐ No Expedite Documentation must be provided if "Request Expedite" = Yes  
Treatment

Expedited Explanation DUE TO SHORTAGE OF FACILITIES IN EXISTING SWITCH. RUNNING OUT OF CAPACITY.

### 1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of  
Company\* CAP OR CLEC

b) Type of  
Service\* Wireline

c) Code  
Assignment  
Preference  
(Optional)

NOTE: For a list  
of available  
codes go to the  
NANPA website  
at  
www.nanpa.com;  
click on Reports  
then Central  
Office Codes.

d) Codes that  
are undesirable,  
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)

### 1.5 Type of Request\*

☐ Initial ☒ Growth

Pooling



Indicator<sup>13</sup> \* Yes No

## 1.6 NPA Jeopardy Criteria

1.7 Code  
Request for  
new service  
(Explain)

1.8

It is the code applicant's responsibility to arrange input of Part 2 information into BIRDS. The 45-calendar day nationwide minimum interval cut-over for BIRDS will not begin until input into BIRDS has been completed.

Remarks

Submit <sup>14</sup>

Cancel

Part1A Foot Notes

Part1 Foot Notes

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/incguides.asp>) as of the date of this application.<sup>14</sup>

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.

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## Pooling Administration System

deniso.cozad@cinbell.com (SP)

• Sign Out

Time: 01/05/2012 03:14:33 PM EST

Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>

Date: Thursday, January 5, 2012

OCN 9348

Company Name CINCINNATI BELL, INC.

Rate Center: CINCINNATI

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

513-206-1 513-221-0,1,2,3,4,5,6,7,8 513-230 513-231 513-232 513-233-0,2,3,4,6,9 513-241 513-242  
 513-243 513-244 513-245-0,1,2,3,5,6,7,9 513-246 513-247 513-251 513-263-1,2,3,4,5,6,7,8,9 513-271  
 513-272 513-277-2,3,5,6,7,8 513-281 513-287-1,2,3,4,5,6,7,8 513-303 513-321 513-326 513-333  
 513-345-1,2,3,4,5,6,7,8,9 513-346-1,2,3,4,5,6,7 513-347 513-351 513-352 513-353-0,1,2,3-4-5-9 5  
 13-357 513-358 513-361 513-362-1,2,3,4,5,6,7,8 513-363 513-366 513-369 513-372-3 513-381 513-385  
 513-386-1,2,3 513-387-0,1,2,3,4,5,6,7,8 513-388-0,2,3,4,5,9 513-389-0,1,2,3,4,5,7,9 513-395 513-396  
 513-397 513-412 513-418-0,2,4,5,6,9 513-419-0,1,2,3,4,5,6,7,8 513-421 513-451 513-455-  
 1,2,3,4,5,6,7,8,9 513-458-0,1,2,3,4,5,6,7,8 513-467-0,1,2,3,4,5,6,7,9 513-469 513-471 513-474  
 513-475-0,1,2,4,5,6,7,8,9 513-481 513-482-2,3,4,5,6,7,8 513-483 513-487-1,2,3,4,5,6,7 513-489  
 513-521 513-522 513-527 513-530 513-531 513-533 513-534 513-541 513-542 513-551-1,2,4,5 513-552

Code/Block Applicant: Denise S Cozad

Title: Technical Clerk 3

Phone: 513-566-4130

Fax: 513-651-9089

E-Mail: deniso.cozad@cinbell.com

A. Available Numbers:\* 547709

B. Assigned Numbers:\* 1192607

C. Total Numbering Resources:\* 1740316

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation2:\* 0

List excluded Code(s) or Block(s)

E. Growth History Previous 6-months3:\*

Month 1	-2568	Month 2	-978
Month 3	-1858	Month 4	-1291
Month 5	-1811	Month 6	96

F. Forecast Next 12 months4:\*

Month 1	1000	Month 2	-1402
Month 3	-1402	Month 4	-1402
Month 5	-1402	Month 6	-1402
Month 7	-1402	Month 8	-1402
Month 9	-1402	Month 10	-1402
Month 11	-1402	Month 12	-1402

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) -1001.667

H. Months to Exhaust<sup>5</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested  
1A. Available Numbers  
547709H. Months to Exhaust  
-546.797

I. Utilization<sup>6</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
Explanation 68.528

Continue

Show Calculations

Cancel

<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, § 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)).

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






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# Pooling Administration System

 donise.cozad@cinbell.com (SP)

• Sign Ou

Time : 01/05/2012 03:15:54 PM EST

-  Individual Block Requests
-  CO/NXX Code Requests
  -  New Code Request
  -  Code Modification
  -  Code Disconnect
  -  Copy Code Request
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

## Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup>

Your Utilization calculates to 68.528%. The FCC required the utilization of 75.000%.

### Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Need to request a State Waiver
- ☐ Received a State Waiver

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

**Commission of Ohio Docketing Information System on**

**1/6/2012 10:15:01 AM**

**in**

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

Summary: Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Number Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Telephone Company LLC