

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-COI
Number Assignment Procedures)	

AT&T OHIO'S REQUEST FOR REVIEW OF A
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

AT&T Ohio, by its attorneys and pursuant to 47 CFR § 52.15(g)(3)(iv), respectfully requests that the Public Utilities Commission of Ohio ("Commission") review and overturn the Pooling Administrator's ("PA" or "NeuStar") denial of AT&T Ohio's request for numbering resources, as more fully described herein.

OhioHealth requested a new NXX code in order to obtain 10,000 new telephone numbers in the Columbus rate center. Since the numbering resources in AT&T Ohio's numbering inventory are inadequate to meet OhioHealth's needs, AT&T Ohio requested NeuStar to assign a new NXX code for use by OhioHealth in the Columbus rate center. More specifically, OhioHealth requested the 614-788 code, which is available for assignment from NeuStar; however, that request was denied.

The need for the new numbering resources is prompted by the fact that OhioHealth is in the midst of dramatic expansion which is expected to continue over the next several years which has resulted in the growth of OhioHealth's telecommunications needs as well. As such, OhioHealth must augment its existing Direct Inward Dialing

(DID) system, which presently uses 30,000 telephone numbers assigned from three NPA-NXX codes fully dedicated to OhioHealth. Given the unique dialing arrangement OhioHealth currently utilizes, where all of its existing, assigned DID numbers begin with the number five, and a network design that allows all internal calls to be dialed using seven digits, regardless of which OhioHealth site in the Central Ohio area is being called, OhioHealth requested that the new NXX code begin with a five, and have repeating second and third digits, similar to the three NPA-NXX codes currently assigned to OhioHealth, 614-533, 614-544, and 614-566. OhioHealth would like to continue this pattern. After reviewing its needs and considering the available numbers, OhioHealth specifically requested the 614-788 code and all 10,000 numbers to use in facilitating OhioHealth's continued expansion. Assignment of this code is critical for meeting OhioHealth's numbering resource needs. Numbers conforming to the requested format will ensure compatibility with the current 7-digit dialing plan and a seamless expansion by allowing OhioHealth to continue utilizing its unique numbering pattern.

Over the past several years, the OhioHealth network has grown tremendously as the number of OhioHealth locations has increased from approximately 80 to 250. This includes the opening of the Westerville Health Center, Pickerington Rehab, Pickerington Primary Care, Bing Cancer, and Women's Health among others; the addition of over 100 new physician practices; the addition of five MaxSports centers; the expansion of several administrative offices; an increase in the amount of clinical space at various member hospitals including Grant, Riverside, and Doctors Hospitals; the relocation of associates to non-clinical off-campus space, and numerous other expansion projects.

Moreover, OhioHealth expects to continue to implement significant growth, acquisition and expansion plans for the foreseeable future. For example, Riverside Hospital is building a Neurological Center that will utilize at least 2,000 of the new numbers; two new health centers in Pickerington and Grove City will each require approximately 500 new numbers; roughly 48 new physician practices will be added annually for the next several years, each requiring between 10 to 50 new numbers. Further, it is expected that several large office buildings will be developed in order to accommodate the overall increase in personnel driven by this expansion. Besides these projects, many others are also under development. Given this tremendous growth, OhioHealth has all but exhausted its existing numbering resource inventory and the few remaining telephone numbers are woefully inadequate to meet its needs. Thus, it has an immediate need for new telephone numbering resources to accommodate its immediate and future telecommunications demands.

OhioHealth's request for numbers cannot be filled with AT&T Ohio's existing numbering resource inventory. Recent review of AT&T Ohio's inventory in the Columbus rate center demonstrates that numbering resources sufficient to meet OhioHealth's criteria are simply not available. However, AT&T Ohio's request to obtain the required numbering resources from NeuStar will not be processed because AT&T Ohio does not meet the two required FCC criteria to obtain numbering resources in the Columbus rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. AT&T Ohio is at a 168.42 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 AT&T Ohio is at 68.13%. 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 as follows:

(iv) 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.

In addition, 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, "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." AT&T Ohio submits that OhioHealth's request constitutes special circumstances and demonstrates a clear requirement that warrants the Ohio Commission's review and reversal of NeuStar's decision.

Attached to this request are copies of AT&T Ohio's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of OhioHealth's request.

For the reasons set forth herein, AT&T Ohio respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the 614-788 NPA-NXX in the Columbus rate center to AT&T Ohio for use by OhioHealth.

Respectfully submitted,

AT&T Ohio

By: /s/ Jon F. Kelly
Jon F. Kelly (Counsel of Record)
Mary Ryan Fenlon
AT&T Services, Inc.
150 E. Gay St., Rm. 4-A
Columbus, Ohio 43215

(614) 223-7928

Its Attorneys

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
December 9, 2005

Tracking Number: _____

Type of Application: **xNew** ☐ **Change¹** ☐ **Delete**

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **AT&T Southwest**
Headquarters Address: **2600 Camino Ramon**
City, State, Zip: **San Ramon, CA 94583**
Contact Name: **Connie McNaughton**
Contact Address: **2600 Camino Ramon, 1S900V**
City, State, Zip: **San Ramon, CA 94583**
Phone: **925-824-5627** Fax: **925-355-9268** E-Mail: **Cm3123@att.com**

Code Administrator²:

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

1.2 NPA: **614** NXX³: _____ LATA: **324** OCN⁴: **9321** Parent Company's OCN(s): **9300**
Switching Identification (Switching Entity/POI)⁵: **CLMBOH1122E**
Locality/City/Wire Center: _____ Rate Center⁶: **COLUMBUS**
Homing Tandem Operating Co.⁷: **AT&T OHIO-9321** Tandem Homing CLLI^{TM 8}: **CLMBOH1156T**

1.3 Dates: Date of Application: **05/23/2012** Requested Effective Date^{9 10}: _____

1.4 a). Type of company/entity requesting the code: **ILEC**
 b). Type of Service **POTS** (e.g., Cellular – Type 2)
 c). Code Assignment Preference (Optional) _____
 d). Codes that are undesirable, if any _____
 e). Type of Change (Mark **all** that apply):
 ☐ OCN: Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem Homing CLLI
 ☐ OCN: Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend Reservation

1.5 Type of Request (Initial, Growth, etc.) **GROWTH**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days.
If a growth code, attach months to exhaust worksheet.

Pool Indicator¹³: Yes ☐ X No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes X No

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
December 9, 2005

1.7 Code request for new service (Explain): _____

1.8 ☐ Part 2 attached X Part 2 is not attached for BIRRDS^{14 15}
☐ Additional Documentation is attached ☐ Additional Documentation is not attached

Comments: **SAFETY VALVE WAIVER REQUEST – DEDICATED CUSTOMER – OHIO HEALTH**

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/docs.asp>) as of the date of this application.¹⁶

<u>ON FILE – CONNIE MCNAUGHTON</u>	<u>CODE ADMINISTRATOR</u>	<u>05/23/2012</u>
Signature of Code Applicant	Title	Date

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)
December 9, 2005

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ 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 may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

TM Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ **WARNING!** It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

Appendix 3 - Modified August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)

Date: 05/23/2012 OCN: 9321 Company Name: AT&T INDIANA

Rate Center: COLUMBUS

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX (85), NXX-X (304)

Name of Block Applicant: CONNIE MCNAUGHTON Signature SIGNATURE ON FILE

Title: CODE ADMINISTRATOR Telephone No.: 925-824-5627 FAX No.: 707-435-6386
E-Mail: cm3123@att.com

A. Available Numbers: 396536

B. Assigned Numbers: 705270

C. Total Numbering Resources: 1153571

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0

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

		Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E.	Growth History – Previous 6 months ²	-952	-2226	--1981	-1034	-5417	-3760						
F.	Forecast – Next 12 months ³	0	1602	11277	830	0	417	124	0	408	141	84	158
G.	Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): <u>2354.333</u>												
H.	Months to Exhaust ⁴	$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$							=	<u>168.428</u>			
I.	Utilization ⁵	$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$							* 100	=	<u>61.138%</u>		

Explanation: ACTL MO1 (-3701), ACTL MO5 (-777), ACTLMO 8 (-476) SAFETY VALVE WAIVER REQUEST FOR OHIO HEALTH

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 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.

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

4 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)).

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

From: agnes.rom@neustar.biz
Sent: Tuesday, May 22, 2012 10:33 AM
To: PANOPIO, LOURDES B; GESCAT, SUZANNE S;
MOSELEY, PATRICIA A; MC NAUGHTON, CONNIE S
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/
Confirmation for Tracking Number: 614-COLUMBUS-OH-538537

Pooling Administration System

Dated 22-May-2012

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 614-COLUMBUS-OH-538537

Date of Application:	<u>05/22/2012</u>	Effective Date:	<u> </u>
Date of Receipt:	<u>05/22/2012</u>	Date of Response:	<u>05/22/2012</u>

Service Provider Name:	AMERITECH OHIO
(Telcordia TM LERG TM Routing Guide) OCN:	9321

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Agnes Rom Phone: **925-363-7650**

Signature of Pooling Administrator

Agnes Rom Fax: **925-363-7681**

Name (print)

Email: rom@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: _____

CLMBOH1122E

COLUMBUS

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.)





April 17, 2012
OhioHealth
Information Services
755 Thomas Lane
Columbus OH 43214

ATT
Mary Revard
150 E. Gay Street
Columbus, OH 43215

RE: Block of DID numbers

Dear Mary:

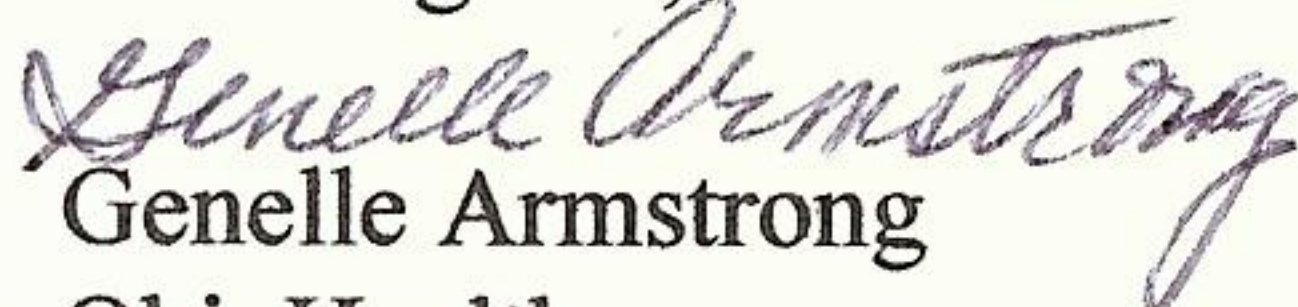
This letter documents our requirement in relation to additional numbering resources. It is understood that ATT may take this request to the state commission, if needed, to fulfill our request. ATT is and has been our primary provider of ISDN PRI t-1's since 1997.

OhioHealth the corporate offices for the hospitals of Riverside Methodist Hospital, Grant Medical Center, Doctors Hospital, Dublin Methodist Hospital. OhioHealth is continually expanding their clinical services and locations in Central Ohio. In the past several years we have built one hospital, added numerous administrative type office space and added clinical space at Grant, Riverside and Doctors Hospitals. In addition OhioHealth continues to add clinical and physician offices to the existing telephone systems. We continue to relocate associates to non-clinical off campus space to expand clinical initiatives. Our network has grown significantly in the past three years.

It is apparent that the long range plan for the current DID range is insufficient. OhioHealth currently has over 30 PBX's, numerous other smaller phones systems in more than 45 locations and over 27,000 phones, fax, and other miscellaneous DID numbers in use throughout the central Ohio area. We are adding numerous new locations, a new patient tower, two health centers in the summer of 2014, fax servers, over 40 physician practices and have numerous other initiatives. Our network is designed so that all internal calls can be dialed using seven digits to reach any other site. All existing DID numbers begin with the number five. Our current exchanges are 614-566-0000 through 566-9999 and 614-544-0000 through 544-9999, 614-533-000 through 614-533-9999. OhioHealth would want to continue that pattern. We cannot use number ranges that begin with 1, 2, 4, 6, 7, 8, 9. Because of our unique dialing pattern we would prefer the new block of number to begin with a five and have a 2nd and 3rd number repeating pattern. We are requesting a block of 10,000 numbers. The new DID range would be installed at the Riverside Methodist Hospitals location and disbursed when required.

Thank you for your attention to this matter.

Best Regards,


Genelle Armstrong

OhioHealth
Network and Telecom Expense Manager
755 Thomas Lane
Columbus Oh 43214

614-566-4635
garmstro@ohiohealth.com

This foregoing document was electronically filed with the Public Utilities

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in

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

Summary: Request for review of a decision of NeuStar - Pooling Administrator electronically filed by Jon F Kelly on behalf of AT&T Ohio