

**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-UNC
Number Assignment Procedures)

**CENTURYTEL OF OHIO INC. DBA CENTURYLINK
REQUEST FOR REVIEW OF A DECISION OF NEUSTAR - POOLING
ADMINISTRATOR**

CenturyTel of Ohio Inc. d/b/a CenturyLink ("CenturyLink") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") direct NeuStar, the Pooling Administrator ("PA"), to provide CenturyLink with an uncontaminated consecutive thousand number block in the Lorain wire center of the Lorain Ohio rate center to satisfy the request of CenturyLink customer, Mercy Regional Medical Center. Mercy Regional Medical Center has requested an additional 1000 sequential numbers due to office changes and a system upgrade.

BACKGROUND

On June 13, 2012 Mercy Regional Medical Center sent a letter to CenturyLink requesting a consecutive group of numbers due to numerous organization changes and the upgrading to Cisco systems. (Exhibit A). Due to these changes, now would be the time to combine DID numbers into one prefix and into a sequential numbering plan. Handling of incoming calls would be more efficient having numbers in one prefix.

CenturyLink reviewed the customer's request and determined that it did not have the requested consecutive number block available within the Lorain rate center.

The request of Mercy Regional Medical Center was for a 1000 block of DID numbers 440-222-4000 thru 440-222-4999 and on July 3, 2012 CenturyLink submitted a

Thousand Block Application Form – Part 1A to the PA for the assignment of a consecutive uncontaminated number block necessary to meet Mercy Regional Medical Centers needs. A copy of this application is attached. (Exhibit B). CenturyLink completed the application in accordance with the Thousands Block Number (NXX-X) Pooling Administration Guidelines and completed the necessary Months to Exhaust ("MTE") Certification, attached. (Exhibit C).

On July 3, 2012, the PA, via the Pooling Administration System ("PAS"), denied the request on the grounds that CenturyLink had not met the rate center-based MTE and/or utilization criteria set forth in the NXX Number (NXX) Pooling Administration Guidelines, notwithstanding the fact that CenturyLink does not have the numbering resources needed to satisfy its customer's request in the switch at issue. This denial of the application received by CenturyLink from the PAS system is attached. (Exhibit D).

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. Under existing procedures, the PA looks at the number of months-to-exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket 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 specific customer request." Also, paragraph 64 indicates that "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." Therefore, this Commission has the authority to review the PA's decision and reverse it when appropriate.

CenturyLink's request to obtain the required numbering resources from NeuStar was not processed because CenturyLink does not meet the two required FCC criteria to obtain numbering resources in the Lorain rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. CenturyLink is at a 422,395 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 CenturyLink is at 45.71%. 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:

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.

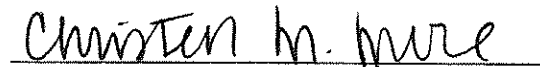
CenturyLink submits that Mercy regional Medical Center's request constitutes special circumstances and demonstrates a clear requirement that warrants the Commission's review and reversal of NeuStar's decision.

CONCLUSION

CenturyLink respectfully requests that the Commission review and reverse the PA's decision to withhold numbering resources because it violates the intent and

requirements of the FCC in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need. The PA's denial of numbering resources interferes with CenturyLink's ability to serve its customer, Mercy Regional Medical Center. CenturyLink requests expedited treatment of its request due to the urgent needs and the timeline of the customer and that the Commission overturn the PA's decision and instruct it to release the numbering resources necessary to meet the needs of Mercy Regional Medical Center.

Respectfully submitted,



Christen M. Moore (0086881)

Porter Wright Morris & Arthur, LLP
41 South High Street 30th Floor
Columbus, Ohio 43215
Telephone: (614) 227-2086
Facsimile: (614) 227-2100
Email: cmoore@porterwright.com

*Counsel for CenturyTel of Ohio Inc.
d/b/a CenturyLink*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing Request was served via email to the parties listed below on this 9th day of July, 2012.


Christen M. Moore

Kathy E. Hobbs Alltel Ohio, Inc. 21 E. State Street, Suite 1900 Columbus, OH 43215	Jon F. Kelly AT&T Ohio 150 E. Gay Street, Rm. 4-A Columbus, OH 43215
J. Drew McFarland Attorney at Law 230 East Broadway, Suite 200 Granville, OH 43023-1306	Sally Briar Tariff Mgr. Law & Govt. Affairs AT&T Comm. of Ohio, Inc. 222 W. Adams Street, Suite 1500 Chicago, IL 60606
Kimberly K. Stump General Manager Benton Ridge Telephone Co. P. O. Box 180 Benton Ridge, OH 45816	Nathaniel Hawthorne Attorney at Law 27600 Chagrin Blvd., Suite 260 Cleveland, OH 44122
Sally W. Bloomfield Bricker & Eckler 100 S. Third Street Columbus, OH 43215	Jean Houck Business Telecom, Inc. 4300 Six Forks Rd., Suite 500 Raleigh, NC 27609
Buckland Telephone Co. 105 S. Main Street Buckland, OH 45819	John Bentine, Esq. Chester, Willcox & Saxbe 65 E. State Street, Suite 1000 Columbus, OH 43215

Focal Comm. Corp. of Ohio 200 N. LaSalle St., Suite 1100 Chicago, IL 60601	
Nancy B. Rue, Esq. Frost & Jacobs 2500 NC Center 201 E. Fifth Street Cincinnati, OH 45202	Linda Claytor Tariff-Billing Mgr. Chillicothe Telephone Co. P. O. Box 480 Chillicothe, OH 45601
James P. Miggans Regulatory Manager GTE Service Corp. HQE02E94 600 Hidden Ridge Irving, TX 75038	Mark Romito Cincinnati Bell Telephone Co. P. O. Box 2301 201 E. Fourth Street Cincinnati, OH 45201
Chris J. Phillips Kalida Telephone Co., Inc. P. O. Box 267 121 E. Main Street Kalida, OH 45853	Stephen K. Vogelmeier COI Long Distance 921 Eastwind Drive, Suite 104 Westerville, OH 43081-5316
Preston Meyer New Knoxville Telephone Co. 301 West Street New Knoxville, OH 45871	Boyd B. Ferris Ferris & Ferris, LLP 2733 W. Dublin-Granville Road Columbus, OH 43235
Allen F. Gerth President Pageplus, Inc. 1211 W. Sharon Road Cincinnati, OH 45240	Fibernet of Ohio, LLC 211 Leon Sullivan Way Charleston, WV 25301
Carey A. Roesel Technologies Mgmt., Inc. P. O. Drawer 2 210 N. Park Avenue Winter Park, FL 32790-0200	Carolyn S. Flahive Thompson Hine, LLP 10 W. Broad Street, Suite 700 Columbus, OH 43215-3435
Pamela H. Sherwood Time Warner Telecom of Ohio, LP 4625 W. 86 th Street, Suite 500 Indianapolis, IN 46268	Evan Siegel WorldCom, Inc. 205 N. Michigan Ave, 11 th Floor Chicago, IL 60601

Douglas W. Kinkoph XO Ohio, Inc. Two Easton Oval, Suite 300 Columbus, OH 43219	Stephen M. Howard Jason J. Kelroy Vorys, Sater, Seymour & Pease P.O. Box 1008 Columbus, OH 43216-1008
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EXHIBIT A



Mercy Regional Medical Center

Mercy Allen Hospital

Request for 1,000 DID Numbers

June 13th 2012

To: Century link

As requested we submit the following information associated with our request for 1000 DID new numbers for Mercy Lorain Regional Medical Center

Mercy Regional Medical Center

Colette Matuschek Telecommunications Analyst

440-960-3210

Telecommunications Analyst Colette.Matuschek@health-partners.org

At the end of 2012 we will be going live with multiple office changes in our organization and we will be upgrading to Cisco platforms. At that time we will need to add a range of additional (new) DID numbers. Currently our DID numbers are divided between several prefixes and because we added more DID numbers as they were needed. Taking whatever was available. Since we are adding DID numbers and installing Cisco phone systems it would be the time to combine our DID numbers into one prefix and into a sequential numbering plan. Handling of our incoming calls would be clearer and quicker by having all of our DID numbers in one prefix. The new DID number could be any block of numbers from 440-222-4000 thru 440-222-4999.

The total number of telephone numbers currently in service and the date the new numbers will be activated if the number request is approved. We will be retaining our current blocks 440-960-3000, thru 440-960-4999 and 440-960-6000 thru 440-960-6500 will remain the same we do not want to change the above mentioned numbers. The new numbers will need to be in place for testing by July 30 2012. Denial of the numbering request is not acceptable for our best business practices.

We currently have almost 3500 numbers in use between our various locations.

A handwritten signature in black ink, appearing to read "Colette Matuschek", with a long horizontal flourish extending to the right.

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 440-LORAIN-OH-
548262
Individual Block
Request

Type of Application: ☒ New ☐ Change ☐ Disconnect

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

Company Name: CENTURYTEL OF OHIO, INC. DBA CENTURYLINK
Headquarters Address: 100 CenturyLink Dr
City, State, Zip: Monroe, LA, 71203
Contact Name: Rita Schmitz
Contact Address: 333 N Front Street
City, State, Zip: La Crosse, WI, 54601
Phone: 608-796-5600 FAX: E-mail: Rita.Schmitz@CenturyLink.com

Pooling Administrator: ⁱⁱ

Contact Name: Agnes Rom
Contact Address: 1800 Sutter St
City, State, Zip: Concord, CA, 94520
Phone: 925-363-7650 FAX: 925-363-7681
E-mail: agnes.rom@neustar.biz

1.2 General Information:

Check one : No LRN needed ☒ LRN needed ⁱⁱⁱ ☐

NPA: 440 LATA: 320 OCN: ^{iv} 0630 Parent Company's OCN G026

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
LORNOHXADS0

City or Wire Center Name : _____ Rate Center: ^{vi} LORAIN

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 07/03/2012 Requested Block Effective Date: ^{viii} 07/25/2012

☐ 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 X No _____

Expedited Explanation:

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) 440-222-4
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
Customer has advised that due to internal dialing plan, they are not able to use an NXX that end in "XX4"
- 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 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.

Rita Schmitz

Signature of Block Applicant

Process

Analyst II

Title

07/03/2012

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.

Appendix 3

May 16, 2008

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

Tracking Number: 440-LORAIN-OH-548262Date: 07/03/2012OCN: 0630Company Name: CENTURYTEL OF OHIO, INC.
DBA CENTURLINKRate Center: LORAIN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):440-204-0,1,2,3,4,5,6,7,440-233-0,1,2,3,4,5,6,7,8,9,440-240-0,1,2,5,6,7,9,440-242-2,3,4,6,440-244-0,1,2,3,4,5,6,7,8,9,440-245-0,1,2,3,4,5,6,7,8,9,440-246-0,1,2,3,4,5,6,7,8,9,440-277-0,1,2,3,4,5,6,7,8,9,440-282-0,1,2,3,4,5,6,7,8,9,440-288-0,1,2,3,4,5,6,7,8,9,440-949-1,2,3,4,5,6,7,8,440-960-0,1,2,3,4,5,6,7,8,9,440-989-0,1,2,3,4,5,8,9

Name of Block Applicant: Rita SchmitzSignature: Rita SchmitzTitle: Process Analyst IITelephone No.: 608-796-5600

FAX No.:

E-mail: Rita.Schmitz@CenturyLink.comA. Available Numbers: 70540B. Assigned Numbers: 43460C. Total Numbering Resources: 114000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: 18000

List

Excluded

Code(s) or 440-204-0,1,2,3,4,5,6,7,440-244-0,1,2,3,4,5,6,7,8,9

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
months³

0 0 0 0 0 0

F. Forecast
- Next 12
months⁴

1 0 0 0 0 0 0 0 0 0 0

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 0.167

H. Months
to Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

70540

Months To Exhaust

422395.21

I.

Utilization⁶
=

Assigned Numbers(B) - Excluded Numbers X 100 =
(D) **45.271**

Total Numbering Resources(C)-Excluded
Numbers(D)

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))

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 440-LORAIN-OH-548262

Date of Application: 07/03/2012 Effective Date: _____
Date of Receipt: 07/03/2012 Date of Response: 07/03/2012

Service Provider Name: CENTURYTEL OF OHIO, INC. DBA CENTURYLINK
(Telcordia TM LERG TM Routing Guide) OCN: 0630

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: agnes.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

LORNOHXADS0

Rate Center:

LORAIN

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 Walver 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™ 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.)

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/9/2012 3:47:40 PM

in

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

Summary: Request CenturyLink of Ohio Inc. dba CenturyLink Request for Review of a Decision of NeuStar - Pooling Administrator electronically filed by Ms. Christen M Moore on behalf of CenturyTel of Ohio Inc. dba CenturyLink