

FILE

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November 15, 2012

VIA FED EX OVERNIGHT DELIVERY

Public Utilities Commission of Ohio
ATTN: Docketing Department
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Case No. 10-0884-TP-UNC

Dear Sir/Madam:

Enclosed please find an original and one (1) copy of a Petition of Cleveland Unlimited, Inc. for Review of a Decision of the Pooling Administrator which we are filing in the above-referenced matter.

Please file the Petition and return to me a time-stamped copy in the self-addressed, stamped envelope that is also enclosed for your convenience.

I appreciate your assistance. If you need any additional information, please call me at 330-433-6700.

Very truly yours,

John J. Rambacher

JJR:lc
Enclosures
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Technician Date Processed NOV 16 2012

Before the
PUBLIC UTILITIES COMMISSION OF OHIO
Columbus, Ohio 43215

RECEIVED-DOCKETING D.
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In the Matter of the Commission's)	
Consideration of Telephone Safety Valve)	Case No. 10-0884-TP-UNC
Requests and Other Number Resource)	
Related Filings)	
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PETITION OF CLEVELAND UNLIMITED, INC.
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR

Cleveland Unlimited, Inc. d/b/a Revol Wireless ("Revol") hereby submits this Petition requesting that the Public Utilities Commission of Ohio (the "Commission") review the Pooling Administrator's (the "PA's" or "Neustar's") denial of Revol's request for numbering resources in the Columbia Station, Ohio rate center. As set forth in greater detail below, Revol respectfully requests that the Commission overturn the PA's decision and direct it to assign the requested number block to Revol.

On October 22, 2012, Revol filed a request with Neustar for a thousands-block of numbers within the Columbia Station rate center.¹ Specifically, Revol requested 1,000 numbers in order to obtain the dedicated number range necessary to install a new switch on its network. However, Neustar denied Revol's request on the grounds that Revol had not satisfied the months-to-exhaust and utilization criteria established in the Central Office Code Assignment Guidelines.² Under the Federal Communications Commission's ("FCC's") numbering rules, a state regulatory body, like the Commission, can overturn a PA's decision based on its

¹ To facilitate the Commission's review of its request, Revol has attached hereto as Exhibit A, a copy of its request to Neustar, which includes the MTE and Utilization Certification Worksheet.

² The denial notification from Neustar is attached hereto as Exhibit B.

determination that the petitioning carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.³ As demonstrated herein, the Commission is fully justified in overturning Neustar's decision and granting Revol's request for a new thousands-block.

As part of the process of upgrading its wireless network, Revol is installing faster and more efficient switches to support its network modernization efforts. As the Commission is aware, industry practices and Local Exchange Routing Guide standards require that each switch on a network have a dedicated number range, and Revol's request for a new thousands-block of numbers is intended to satisfy this requirement. The need for new blocks of numbers to satisfy industry requirements for the installation of new switches is well-documented. Indeed, the FCC has explicitly recognized the fact that "new numbering resources are used by carriers to activate new switches" and has installed a safety valve process in order to ensure that carriers have access to the numbers that they need to activate new switches.⁴ Specifically, the FCC permits states "to consider requests from carriers with multiple switches in a given rate center to determine whether relief is warranted" from a PA's decision not to provide numbering resources.⁵ In this instance, Revol's network modernization project requires a new switch, which will deliver faster, more efficient services to new and existing Revol customers in the Columbus Station rate center. As discussed above, installation of this new switch requires a new thousands-block of numbers, and, as such, the provision of this thousands-block of numbers is a necessary step in Revol's network modernization efforts.

³ See 47 C.F.R. § 52.15(g)(4).

⁴ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration, 17 FCC Rcd 252, ¶ 65 (CCB 2001).

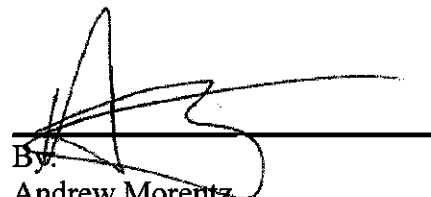
⁵ *Id.*

The PA is Revol's only source for this necessary new block of numbers, and Revol has thus exhausted any other alternative options for relief. Revol is, of course, mindful of the need to preserve scarce numbering resources. In order to use its assigned numbers in the most efficient manner, Revol is pursuing the use of a pooled block, and has requested the thousands-block from a pooled "A block" that Revol currently owns.

For the reasons set forth above, and for good cause shown, Revol respectfully requests that the Commission overturn Neustar's decision and direct Neustar to grant Revol's request for the thousands-block in order to allow Revol to proceed with its network modernization plans.

Respectfully submitted,

Cleveland Unlimited, Inc.



Andrew Morentz

Michael Lazarus

TELECOMMUNICATIONS LAW
PROFESSIONALS PLLC

875 15th Street, NW, Suite 750

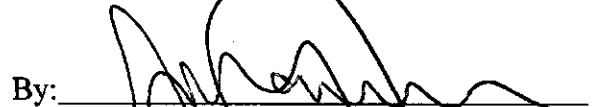
Washington, DC 20005

Telephone: (202) 789-3120

Facsimile: (202) 789-3112

Its Attorneys

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North Canton, Ohio 44720

Phone: (330) 433-6700

Facsimile: (330) 433-6701

Ohio Counsel for Revol Wireless

November 15, 2012

{00035546;v1}

JJR\2012 Misc\Cleveland Unlimited Petition 11.15.DOCX

EXHIBIT A

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 440-
COLUMBISTA-
OH-581061
Individual Block
Request

Type of Application: ☒ New ☐ Change ☐ Disconnect
i

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

Company Name: CLEVELAND UNLIMITED, INC.
Headquarters Address: 7165 East Pleasant Valley Rd
City, State, Zip: Independence, OH, 44131
Contact Name: Frank Vogel
Contact Address: 7165 East Pleasant Valley Rd
City, State, Zip: Independence, OH, 44131
Phone: 216- 573-7045 FAX: E-mail: frank.vogel@revol.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 X LRN needed ⁱⁱⁱ

NPA: 440 LATA: 320 OCN: ^{iv} 8711 Parent Company's OCN 8711

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
INDPOHBBCM2

City or Wire Center Name : _____ Rate Center: ^{vi}
COLUMBISTA
Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 10/22/2012 Requested Block Effective Date:
^{viii} 11/22/2012

☐ 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 : Wireless Telephony (Cellular, PCS, SMR)
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireless Type 1
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) 8,9
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any 5
- 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: **Please contact Frank Vogel at 216-573-7045 with any questions.**

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.

Frank Vogel

Signature of Block Applicant

Transport **10/22/2012**
Engineer

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.

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-COLUMBISTA-OH-581061Date: 10/22/2012OCN:8711Company Name:CLEVELAND UNLIMITED, INC.Rate Center: COLUMBISTA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):216-624 7 Cleveland 216-624 8 Cleveland 216-799 1 Cleveland 216-799 2 Cleveland 216-799 3 Cleveland 216-799 4 Cleveland 216-799 5 Cleveland 216-799 6 Cleveland 216-799 7 Cleveland 216-799 8 Cleveland 216-799 9 Cleveland 216-624 9 Cleveland 216-712 0 Cleveland 216-673 5 Cleveland 216-673 6 Cleveland 216-673 7 Cleveland 216-673 8 Cleveland 216-673 9 Cleveland 216-673 0 Cleveland 216-673 1 Cleveland 216-673 3 Cleveland 216-673 4 Cleveland 216-712 8 Cleveland 440-310 0 columbista 440-310 1 columbista 440-310 2 columbista 440-310 3 columbista 440-310 4 columbista 440-310 6 columbista 216-253 0 Indepndnce 216-253 1 Indepndnce 216-253 2 Indepndnce 216-253 3 Indepndnce 216-253 4 Indepndnce 216-253 5 Indepndnce 216-253 6 Indepndnce 216-253 7 Indepndnce 216-253 8 Indepndnce 216-253 9 Indepndnce 216-355 0 Indepndnce 216-355 1 Indepndnce 216-355 2 Indepndnce 216-355 3 Indepndnce 216-355 4 Indepndnce 216-355 5 Indepndnce 216-355 6 Indepndnce 216-355 7 Indepndnce 216-355 8 Indepndnce 216-355 9 Indepndnce 440-308 0 Lorain 440-308 1 Lorain 440-308 2 Lorain 440-308 3 Lorain 440-308 4 Lorain 440-989 0 Lorain 440-541 1 Lorain 440-541 2 Lorain 440-541 5 Lorain 440-714 6 Lorain 216-376 0 Terrace 216-376 1 Terrace 216-376 2 Terrace 216-376 3 Terrace 216-376 4 Terrace 216-376 5 Terrace 216-376 6 Terrace 216-376 7 Terrace 216-376 8 Terrace 216-376 9 Terrace 440-341 0 Willoughby 440-341 1 Willoughby 440-341 2 Willoughby 440-341 3 Willoughby 440-341 4 Willoughby 440-341 5 Willoughby 440-341 6 Willoughby 440-341 7 Willoughby 440-341 8 Willoughby 440-341 9 Willoughby 440-342 0 Willoughby 440-342 1 Willoughby 440-342 2 Willoughby 440-342 3 Willoughby 440-342 4 Willoughby 440-342 5 Willoughby 440-342 6 Willoughby 440-342 7 Willoughby 440-342 8 Willoughby 440-342 9 Willoughby 440-521 0 Willoughby 440-521 1 Willoughby 440-521 2 Willoughby 440-521 3 Willoughby 440-521 4 Willoughby 440-521 5 Willoughby 440-521 6 Willoughby 440-521 7 Willoughby 440-521 8 Willoughby 440-521 9 Willoughby 330-641 0 Wooster 330-641 1 Wooster 740-953 3 CHESHIRCTR 614-424 2 Columbus 614-483 0 Columbus 614-483 4 Columbus 614-483 7 Columbus 614-747 4 Columbus 614-747 9 Columbus 614-795 9 Columbus 614-607 8 Columbus 614-432 7 Columbus 614-429 9 Columbus 614-463 0 Columbus 614-622 0 Columbus 614-622 1 Columbus 614-622 2 Columbus 614-622 3 Columbus 614-622 4 Columbus 614-622 5 Columbus 614-622 6 Columbus 614-622 7 Columbus 614-622 8 Columbus 614-622 9 Columbus 614-424 0 Columbus 614-424 1 Columbus 740-777 3 Lancaster 614-516 7 WORTHINGTN 614-516 8 WORTHINGTN 614-516 9 WORTHINGTN 614-516 5 WORTHINGTN 614-516 6 WORTHINGTN 614-516 1 WORTHINGTN 614-516 3 WORTHINGTN 614-704 2 WORTHINGTN 614-704 3 WORTHINGTN 614-704 4 WORTHINGTN 614-704 5 WORTHINGTN 614-515 0 WORTHINGTN 614-515 1 WORTHINGTN 614-515 7 WORTHINGTN 614-515 8 WORTHINGTN 614-515 9 WORTHINGTN 614-515 3 WORTHINGTN 937-738 0 Marysville 740-641 0 Newark 740-641 1 Newark 419-806 0 BOWLNGGREN 419-806 3 BOWLNGGREN 419-559 0 Fremont 567-201

0 Fremont 567-201 1 Fremont 419-921 1 Norwalk 419-960 1 PT CLINTON 419-975 0
Sandusky 419-975 2 Sandusky 419-975 4 Sandusky 419-514 0 Toledo 419-514 1 Toledo 419-
514 2 Toledo 419-514 3 Toledo 419-514 4 Toledo 419-514 5 Toledo 419-514 6 Toledo 419-514 7
Toledo 419-514 8 Toledo 419-514 9 Toledo 419-810 0 Toledo 419-810 1 Toledo 419-810 2
Toledo 419-810 3 Toledo 419-810 4 Toledo 419-810 5 Toledo 419-810 6 Toledo 419-810 7
Toledo 419-810 8 Toledo 419-810 9 Toledo 419-870 0 Toledo 419-870 1 Toledo 419-870 2
Toledo 419-870 3 Toledo 419-870 4 Toledo 419-870 5 Toledo 419-870 6 Toledo 419-870 7
Toledo 419-870 8 Toledo 419-870 9 Toledo 419-917 0 Toledo 419-917 1 Toledo 419-917 2
Toledo 419-917 3 Toledo 419-917 4 Toledo 419-917 5 Toledo 419-917 6 Toledo 419-917 7
Toledo 419-917 8 Toledo 419-917 9 Toledo 419-932 0 Toledo 419-407 0 Toledo 419-932 4
Toledo 419-932 5 Toledo 330-330 0 Youngstown 330-330 1 Youngstown 330-330 2 Youngstown
330-330 3 Youngstown 330-330 4 Youngstown 330-330 5 Youngstown 330-330 6 Youngstown
330-330 7 Youngstown 330-330 8 Youngstown 330-330 9 Youngstown 330-431 0 Akron 330-
431 1 Akron 330-431 2 Akron 330-431 3 Akron 330-431 4 Akron 330-431 5 Akron 330-431 6
Akron 330-431 7 Akron 330-431 8 Akron 330-431 9 Akron 330-459 0 Akron 330-459 1 Akron
330-459 2 Akron 330-459 3 Akron 330-459 4 Akron 330-459 5 Akron 330-459 6 Akron 330-459
7 Akron 330-459 8 Akron 330-459 9 Akron 216-342 2 Terrace

Name of Block Applicant: Frank Vegel

Signature: Frank Vegel

Title: Transport Engineer

Telephone No.: 216-573-7045

FAX No.:

E-mail: frank.vegel@revol.com

A. Available Numbers: 39535

B. Assigned Numbers: 275465

C. Total Numbering Resources: 315000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: 5000

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 -

EXHIBIT B

Frank Vogel

From: agnes.rom@neustar.biz
Sent: Monday, October 22, 2012 10:54 AM
To: Frank Vogel
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 440-COLUMBISTA-OH-581061

Pooling Administration System

Dated 22-October-2012

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 440-COLUMBISTA-OH-581061

Date of Application: 10/22/2012 Effective Date: _____
Date of Receipt: 10/22/2012 Date of Response: 10/22/2012

Service Provider Name: CLEVELAND UNLIMITED, INC.
(Telcordia TM LERG TM Routing Guide) OCN: 8711

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

Rate Center:

Rate Center Sub Zone:

INDPOHBBCM2

COLUMBISTA

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 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.)

x