

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**MOTION OF BUCKEYE TELESYSTEM, INC.  
FOR REVIEW OF A DECISION OF  
THE NORTH AMERICAN NUMBERING POOLING ADMINISTRATOR**

Buckeye TeleSystem, Inc. ("Buckeye") is a certificated local exchange carrier providing service to primarily business customers in northwest Ohio. Buckeye has a customer, Mercy Health Partners ("Mercy Health"), a division of Catholic Health Partners that is opening up a new location in Perrysburg, Ohio that Buckeye plans to serve in the near future.

Mercy Health has requested that Buckeye provide it with a block of 4,000 numbers that will satisfy all of its needs. The new location in Perrysburg, Ohio is starting out as an Emergency Department and then will be evolving into a medical office building as well as a hospital. Mercy Health believes that the 4,000 block will be able to cover all its telecommunications needs.

Buckeye prepared its Months To Exhaust and Utilization Certification Work Sheet – TN level. See Attachment A.

Attachment B consists of the Thousands-Block Application Form – Part 1A for tracking number 567-Perrysburg-OH-599137 which was prepared by Buckeye.

Buckeye has submitted a request to the Pooling Administrator which was denied on January 7, 2013. The explanation for the denial given was as follows:

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.

See Attachment C.

Attachment D is a letter from Sally Makovic, Telecommunications, of the Catholic Health Partners.

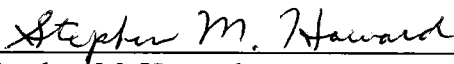
It is reasonable for Mercy Health to request a block of 4,000 numbers that will satisfy its need and the need for residents in the community to be able to reach the emergency department, a medical office building, and a hospital.

The Commission has authority to review the PAS decision and issue a waiver to PAS authorizing assignment of the NPA-NXXs requested by Buckeye.

WHEREFORE, for the reasons set forth above, Buckeye respectfully requests that the Commission or its Attorney Examiner act expeditiously and issue an Order providing a waiver to the PAS and authorizing assignment of the numbering resources that Buckeye has requested on behalf of the Mercy Health Partners, a division of Catholic Health Partners.

Respectfully submitted,

BUCKEYE TELESYSTEM, INC.

  
\_\_\_\_\_  
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Attorneys for Buckeye TeleSystem, Inc.

**ATTACHMENT A**

Appendix 3

May 16, 2008

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>**  
**(Thousands-Block Number Pooling Growth Block Request)**

Tracking Number: 567-PERRYSBURG-OH-599137Date: 01/07/2013OCN: 7608Company Name: BUCKEYE TELESYSTEM,  
INC. - OHRate Center: PERRYSBURGList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 419-931 419-873-5 419-873-6Name of Block Applicant: Teri CunninghamSignature: Teri CunninghamTitle: Carrier Relations Coord - TN AdminTelephone No.: 419-724-3891FAX No.: 419-724-1701E-mail: tcunningham@buckeye-telesystem.comA. Available Numbers: 1845B. Assigned Numbers: 9155C. Total Numbering Resources: 11000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: 671

List

Excluded

Code(s) or 419-931-6

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

<u>66</u>	<u>50</u>	<u>115</u>	<u>51</u>	<u>345</u>	<u>44</u>
-----------	-----------	------------	-----------	------------	-----------

months<sup>3</sup>

F. Forecast

- Next 12 months<sup>4</sup>      210    100    210    100    210    100    4300    100    210    100    210    100

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 155.0

H. Months  
to Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>1845</b>	<b>11.903</b>
<b>2</b>	<b>2845</b>	<b>18.355</b>
<b>3</b>	<b>3845</b>	<b>24.806</b>
<b>4</b>	<b>4845</b>	<b>31.258</b>

I.  
Utilization<sup>6</sup> =  $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$  88.634

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

Explanation: We have a specific customer who requires 4K numbers for installation date of 6/28/13.

<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, section 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))

**ATTACHMENT B**

TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

**Tracking Number:** 567-  
PERRYSBURG-  
OH-599137  
Individual Block  
Request

**Type of Application:** ☐ New ☐ Change ☐ Disconnect  
i

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

Company Name: BUCKEYE TELESYSTEM, INC. - OH

Headquarters Address: 5555 Airport Highway

City, State, Zip: Toledo, OH, 43615

Contact Name: Teri Cunningham

Contact Address: 4818 Angola Road

City, State, Zip: Toledo , OH , 43615

Phone: 419- 724-3891 FAX: 419- 724-1701 E-mail: tcunningham@buckeye-  
telesystem.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: 567 LATA: 326 OCN: <sup>iv</sup> 7608 Parent Company's OCN 7608

Number of Thousands-Blocks Requested : 4

Switching Identification(Switch Entity/POI) : <sup>v</sup>

TOLDOHPGPS0

City or Wire Center Name : \_\_\_\_\_

PERRYSBURG

Rate Center: <sup>vi</sup>

PERRYSBURG

Rate Center Sub Zone: \_\_\_\_\_

### 1.3 Dates:

Date of Application: <sup>vii</sup> 01/07/2013

Requested Block Effective Date:

<sup>viii</sup>

04/01/2013

☐ 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 : CAP OR CLEC (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) \_\_\_\_\_  
567-366-1 567-366-2 567-366-3 567-366-4

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) \_\_\_\_\_

### 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 <sup>ix</sup> ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company <sup>x</sup> ☐ 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: **Available blocks in pooling do not meet customer request for NXX to end in 6 in order to match current numbering in their system.**

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.

**Teri Cunningham**

Signature of Block Applicant

**Carrier  
Relations**

**Coord -** 01/07/2013

**TN  
Admin**

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 Telcordia<sup>TM</sup> LERG<sup>TM</sup> 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 Telcordia<sup>TM</sup> 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 CLLI<sup>TM</sup> tandem of the facilities based provider <sup>xi</sup>. 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. The 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 :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> 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).

<sup>v</sup> 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 CLLI<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

**ATTACHMENT C**

November 21, 2003  
 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
 TBPAG Part 3

**Tracking Number :** 567-  
PERRYSBURG-OH-  
599137

Date of Application: 01/07/2013 Effective Date: \_\_\_\_\_  
 Date of Receipt: 01/07/2013 Date of Response: 01/07/2013

Service Provider Name: BUCKEYE TELESYSTEM, INC. - OH  
 (Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 7608  
 Parent Company OCN: 7608

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): <sup>1</sup> TOLDOHPGPS0  
 Rate Center: PERRYSBURG  
 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 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.

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\_\_\_\_ Request withdrawn.

Explanation:

\_\_\_\_ Assignment activity suspended by the administrator.

Explanation:

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Remarks:

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)

## ATTACHMENT D



615 Elsinore Place  
Cincinnati, Ohio  
45202

P 513.639.2800  
F 513.639.2700

To Whom It May Concern:

Mercy Health Partners, a division of Catholic Health Partners, is opening a new location in Perrysburg, Ohio that will require a block of numbers for current and future use. We have asked for a block of 4000 numbers that will satisfy all of our needs. The building is starting out as an Emergency Department and then evolving into a medical office building as well as a hospital. We feel that the 4000 block will be able to cover all that is needed. If there are any questions please let me know.

Thanks,

Sally



Sally Makovic

Telecommunications

Sally\_Makovic@mhsnr.org

Office 419.696.7327

Cell 419.360.1889

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

**Commission of Ohio Docketing Information System on**

**1/10/2013 11:19:55 AM**

**in**

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

Summary: Motion Motion for Review of a Decision of the North American Numbering Pooling Administrator electronically filed by Mr. Stephen M Howard on behalf of Buckeye Telesystem, Inc.