



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

February 13, 2013

Ms. Betty McCauley
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. McCauley:

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 and attachments are being filed electronically and are contained entirely within this PDF document. 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: Melissa Scarberry (via e-mail)
Dan Fullin (via e-mail)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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)	

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

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 February 6, 2013 CBT filed a request with the PA seeking an entire NXX in the Cincinnati rate center to meet a specific customer request that CBT was unable to satisfy with its existing numbering resources. The PA denied CBT’s request on the grounds that CBT does not meet the months-to-exhaust and utilization criteria established by the Federal Communications Commission. 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.¹ 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 meet this customer’s needs.

The Federal Communications Commission (“FCC”), in its Third Report and Order in the Numbering Resource Optimization proceeding, found that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the

¹ 47 CFR 52.15(g)(4)

carrier's inability to satisfy a specific customer request.”² It also clarified that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers.³ Therefore, this Commission has the authority to overturn the PA's decisions under the appropriate circumstances.

Catholic Health Partners' Request

In the immediate case, CBT has a request from Catholic Health Partners (“CHP”) for 10,000 numbers to be used for a new hospital and medical offices currently under construction in Cincinnati, Ohio (see Attachment A). Construction of the new Mercy West Hospital is nearing completion and the hospital is scheduled to open in the fall of 2013. The medical office building being constructed next to the hospital is scheduled to open in 2014. CHP expects to use approximately 5,000 numbers at the hospital and another 2,000 – 3,000 numbers at the medical office building. The remaining numbers would be held by CHP and used for additional growth at its facilities in the Cincinnati region.

CHP has requested a full NXX, with the third digit of “5” (“NX5”) so that it can incorporate these new numbers into its corporate-wide 5-digit dialing plan. Securing this NXX may also enable CHP to convert some numbers at its other Cincinnati facilities to this NXX and retire the old numbers. Any existing numbers that are retired would be returned to CBT and any uncontaminated thousands-blocks would be donated by CBT to the number pool in the Cincinnati rate center.

² Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200*, FCC 01-362, (rel. Dec. 28, 2001) (Third Report and Order) at ¶64.

³ *Id.*

CBT has reviewed its number inventory and has no unopened NXXs in the Cincinnati rate center. However, as shown on the attached Pooling Administration System Worksheet, CBT's request for a new NXX for this customer was rejected because it does not meet the MTE and Utilization threshold (see Attachment B).

Conclusion

For the reasons set forth above, CBT requests that the Commission overturn the PA's decision and direct the PA to grant CBT's requests for a full NXX in the Cincinnati rate center to satisfy the needs of its customer.

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

Attorney for Cincinnati Bell Telephone
Company LLC

ATTACHMENT A

Catholic Health Partners
CHPIT Telecom
Suite 100
4600 McAuley Place
Cincinnati, Ohio 45242
(513) 981-6000

The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

Dear Commissioner's,

Please accept this letter as a formal request for a 10,000 consecutive DID block of numbers. If possible we would like the prefix to end in the number "5", and please use (513)xx5-xxxx as reference. This will enable us to create new internal extensions, and then look to retire existing numbers that we can return to Cincinnati Bell. The request for numbers is driven by Catholic Health Partners continued growth in Ohio, and commitment to patients we serve. The block of numbers will be used for Mercy Health's new Mercy West Hospital that is under construction in Cincinnati, Ohio, and for our corporate dialing plan. Mercy Health is the Cincinnati Division of Catholic Health Partners.

The new Mercy West Hospital located at 3300 Mercy West Boulevard in Green Township opens in 2013, and will be a 250-bed facility with the latest in advancements designed for patient care. The Hospital will have approximately 5,000 employees that will include staff, physicians, nurses, volunteers, etc...with an estimated 4,000 numbers required. The new Hospital will include:

- Inpatient and Outpatient care
- Heart care with open heart surgery
- Cancer center
- Orthopaedics center
- Women's health center
- OB/maternity care
- Family Birth Center
- Primary and Specialty care physician offices
- Community Center
- Education Center

Mercy West Hospital will serve as the center of our growing network of healthcare services throughout the West Side of Cincinnati to enhance access to quality medical care through a variety of services and locations – both inpatient and outpatient. We are committed to providing a network of care that makes it easier than ever for patients to receive the care needed, in a setting they prefer right in their community. In addition, the new Mercy West Hospital will retain and create quality Healthcare jobs in Ohio.

Catholic Health Partners is also building a new Medical Office Building next to the Mercy West Hospital. The Medical Office Building is scheduled to open sometime in 2014. The block of numbers requested in this document will also be used at this new facility. We estimate that 2,000 – 3,000 numbers will be required for the additional Physician offices, conference rooms, doctors, staff, etc... The Medical Office Building will also provide space for outpatient Physical Therapy as well as Outpatient services for women and Children, Conference rooms and physician

Catholic Health Partners telephony strategy is to deploy Cisco IP telephony equipment for new facilities, and when legacy end of life phone systems need to be replaced. The block of numbers will allow us to implement a corporate wide 5 digit dialing plan, account for growth in staff or new physician offices and patient care support. One of our goals is to reduce the confusion to our patients, their families, doctors and staff. The approval of this request will help accomplish this goal by allowing for a single prefix. As

departments are relocated to the Mercy West facility any existing DID blocks that are not required will be returned to Cincinnati Bell.

About Mercy Health

Mercy Health is a comprehensive, integrated regional healthcare system, renowned for our quality, innovation, compassionate service, and culture. It was established in 1996 when The Mercy Hospital of Anderson, Clermont, Fairfield and Hamilton joined the larger Catholic Health Partners system which covers 5 states and is the largest not-for-profit healthcare system in Ohio.

Mercy Health Partners commits to carry out the Catholic Healthcare Partners mission within our community by providing safe, effective, patient/resident centered, timely and cost efficient care and education to meet the health needs of all people, especially the poor and underserved. Our commitment

To this healing ministry will be evidenced by exceptional care, compassion and respect for the diverse religious beliefs and faith traditions of those we serve.

Mercy West Hospital joins a host of healthcare facilities and providers in its region, including:

- Mercy Hospital Fairfield, a critical access hospital north of Cincinnati.
- Mercy Hospitals Anderson and Mercy Clermont east of Cincinnati.
- Long-term care facilities: St. Theresa Village, St. John's Center, Mercy Westpark and Mercy Franciscans Schroder.
- Outpatient surgery center
- Wound care center
- Sports medicine/physical rehabilitation center
- Sleep Center
- Regional Cancer Center
- Regional Imaging Center
- 7 outpatient laboratory centers
- Occupational Health center
- Medical offices for hospital-owned physician practices – approximately 23 at this time with a plan for an additional 28 offices by the end of 2013 and steady growth thereafter.

Should you need any additional information please do not hesitate to contact me with any questions you may have regarding this request.

Thank you in advance for accepting this request!

Respectfully,
Nick Neysari
Catholic Health Partners Information Technology (CHPIT)
Senior Telecom Engineer/ Team Lead, Telecommunications
nneysari@Health-Partners.org























ATTACHMENT B

Pooling Administration System

 deniso.cozad@cinbell.com (SP)

[Sign Out](#)

Time : 02/06/2013 07:53:58 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

Your request has been successfully submitted.
The Tracking Number for this request is: 513-CINCINNATI-OH-611146

[Return to Inbox](#)

[View Forms](#)

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Pooling Administration System

 deniso.cozad@cinbell.com (SP)

• Sign Out

Time : 02/06/2013 07:21:53 PM EST

Request Resources














States * OHIO

NPA * 513

Rate Center * CINCINNATI

OCN * 9348-CINCINNATI BELL, INC.

Type of Application: Full NXX for Dedicated Customer

-  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

Pooling Administration System

donise.cozad@cinbell.com (SP)

• Sign Out

Time : 02/06/2013 07:30:00 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

Validation Error

You must correct the following error(s) before proceeding:

- Please enter a valid Tandem Homing CLLI.

For assistance, please contact the Help Desk at 866-NeuPool (866-638-7665).

Part1/1A

Type of Application: New Code

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 doniso.cozad@cinbell.com

Pooling Administrator¹:

Name Agnes Rom
Address 1800 Sutter St
City Concord
State CA
Zip 94520
Telephone 925-363-7650
Fax 925-363-7681
Email agnes.rom@neustar.biz

Code Administrator²:

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 Neededⁱⁱⁱ NO

NPA 513 NXX³ LATA* 922
 OCN^{iv,4} 9348-CINCINNATI BELL, INC.
 Parent Company OCN* 9348
 Number of Thousands-Blocks Requested 10 Locality/City/Wire Center
 Switch Identification (Switching Identity/POI) Code v.5* CNCNOHWDDS0
 Rate Center^{vi,6} CINCINNATI Rate Center Sub Zone
 Homing Tandem Operating Company *7 CINCINNATI BELL INC Homing Tandem CLLI^{8*} CNCNOHWS20W

1.3 Dates

Date of Application^{vii} 02/06/2013
 Requested Effective date 04/13/2013 MM/DD/YYYY
 Code viii,9,10*

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

Expedited Explanation

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 513-814 (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 N/A

given to the pool)

1.5 Type of Request*

☐ Initial ☒ Growth

Pooling
Indicator¹³ ☒ 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

Submit¹⁴

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.¹⁴

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.

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Pooling Administration System

doniso.cozad@cinbell.com (SP)

Sign Out

Time: 02/06/2013 07:52:40 PM EST

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date: Wednesday, February 6, 2013

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
513-357 513-358 513-361 513-362-1,2,3,4,5,6,7,8 513-363 513-366 513-369 513-372-3 513-381 513-385
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

Code/Block Applicant: Denise S Cozad

Title: Technical Clerk 3

Phone: 513-566-4130

Fax: 513-651-9089

E-Mail: doniso.cozad@cinbell.com

A. Available Numbers:* 567307

B. Assigned Numbers:* 1173971

C. Total Numbering Resources:* 1741278

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	1454	Month 2	-3414
Month 3	-2620	Month 4	-2559
Month 5	-4080	Month 6	811

F. Forecast Next 12 months⁴.*

Month 1	-1735	Month 2	-1735
Month 3	-1735	Month 4	-1735
Month 5	-1735	Month 6	-1735
Month 7	-1735	Month 8	-1735
Month 9	-1735	Month 10	-1735
Month 11	-1735	Month 12	-1735

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) -1735.0

H. Months to Exhaust⁵ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested

1

A. Available Numbers

567307

H. Months to Exhaust

-326.978

I. Utilization⁶ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100
Explanation

67.420

Continue

Show Calculations

Cancel

- 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 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).
- ³ 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.
- ⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
- ⁵ 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)).
- ⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii)).

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Pooling Administration System

 deniso.cozad@cinbell.com (SP)

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Time : 02/08/2013 07:53:07 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)¹

Your Utilization calculates to 67.420%. 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

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PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 513-CINCINNATI-OH-611146

agnes.rom@neustar.biz

Sent: Wednesday, February 06, 2013 7:54 PM

To: Setser, Cathy; Cozad, Denise

Cc: PA_Part3@neustar.biz

Pooling Administration System

Dated 06-February-2013

November 21, 2003

ATIS-0300066.at3

Attachment 3

**Pooling Administrator's Response/Confirmation
TBPAG Part 3**

Tracking Number : 513-CINCINNATI-OH-611146

Date of Application: 02/06/2013 Effective Date:
Date of Receipt: 02/06/2013 Date of Response: 02/06/2013

Service Provider Name: CINCINNATI BELL, INC.
(Telcordia™ LERG™
Routing Guide) OCN: 9348
Parent Company OCN: 9348

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 CNCNOHWDDS0

Rate Center: CINCINNATI

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 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.)



This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/13/2013 4:59:20 PM

in

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

Summary: Petition Petition of Cincinnati Bell Telephone Company 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