

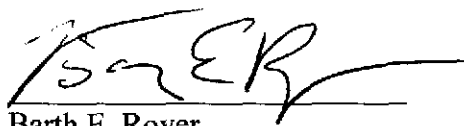
approximately 75 months. *Id.* In addition, Verizon's utilization level of 47% fell short of the FCC's required 75% threshold. *Id.*

A state commission may overturn the PA's decision based on the state commission's determination that the carrier has demonstrated a verifiable need for the requested numbering resources and has exhausted all other available remedies. *See* 47 C.F.R. § 52.15(g)(4). Similarly, the FCC has held 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 a specific customer request." *See* Third Report and Order and Second Order on Reconsideration, *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, 17 FCC Rcd 252 (rel. Dec. 28, 2001) at ¶ 64. State commissions are permitted to grant such requests provided they are for customers seeking contiguous blocks of numbers, rather than "vanity numbers." *Id.*

In this case, Verizon's customer, Progressive Casualty Insurance Co Inc. ("Progressive"), requires 160 consecutive DID numbers for its Akron, Ohio claims center in order to meet its need for numbers that will allow for current dial plan integration and national implementation of Progressive's upgraded VoIP phone systems. *See* **Exhibit 2**, which is a true and correct copy of Progressive's February 4, 2013 letter to the Commission, explaining its business needs. Progressive will suffer significant financial detriment if the PA's decision is not overturned. *Id.*

For the foregoing reasons, Verizon respectfully requests that the Commission overturn the PA's decision and direct the PA to grant Verizon's request for a single thousands-block of numbers in the Akron rate center to satisfy Progressive's need for 160 contiguous DIDs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Barth E. Royer', with a long horizontal flourish extending to the right.

February 19, 2013

Barth E. Royer
Bell & Royer Co., LPA
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Columbus, Ohio 43215-3927
(614) 228-0704
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*Attorney for MCI metro Access
Transmission Services LLC d/b/a Verizon
Access Transmission Services*

EXHIBIT 1

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 330-AKRON-OH-612719
Individual Block Request

Type of Application: New i Change Disconnect

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

Company Name: MCI WORLDCOM COMMUNICATIONS, INC. - OH

Headquarters Address: 22001 Loudoun County Parkway

City, State, Zip: Ashburn, VA, 20147

Contact Name: Godfrey Chisanga

Contact Address: 2400 N Glenville Dr

City, State, Zip: Richardson, TX, 75082

Phone: 972-729-5103 FAX: - E-mail: godfrey.chisanga@verizonbusiness.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: 330 LATA: 325 OCN: ^{iv} 7443 Parent Company's OCN 7229

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
AKRNOH25OMD

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

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 02/13/2013 Requested Block Effective Date: ^{viii} 03/08/2013

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 X No _____

Expedited Explanation:

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) _____
- 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^{ix} Switching Id Part 1BOCN: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.

Godfrey Chisanga**Signature of Block Applicant****Manager****Title****02/13/2013****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.

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: 330-AKRON-OH-612719Date: 02/13/2013OCN: 7443Company Name: MCI WORLDCOM
COMMUNICATIONS, INC. - OHRate Center: AKRON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: Godfrey
ChisangaSignature: Godfrey ChisangaTitle: ManagerTelephone No.: 972-729-5103

FAX No.:

E-mail: godfrey.chisanga@verizonbusiness.comA. Available Numbers: 5428B. Assigned Numbers: 5176C. 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 ²: 0

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 - Previous 6	<u>-17</u>	<u>-11</u>	<u>-24</u>	<u>110</u>	<u>2</u>	<u>39</u>
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November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 330-AKRON-OH-612719

Date of Application: 02/13/2013 **Effective Date:** _____
Date of Receipt: 02/13/2013 **Date of Response:** 02/13/2013

Service Provider Name: MCI WORLDCOM COMMUNICATIONS, INC. - OH
(Telcordia TM LERG TM Routing Guide) OCN: 7443
Parent Company OCN: 7229

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 AKRNOH25OMD
Rate Center: AKRON
Rate Center Sub Zone: _____

☒ **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.)

EXHIBIT 2

PROGRESSIVE

Amanda Ufholz
440-395-1875

amanda.1ufholz@progressive.com

Site Address:
Progressive Casualty Insurance Co
46 West Waterloo Rd
Akron, OH 44319
Mitchel Zegarac
www.progressive.com

2/4/2013

Ohio PUC / PSC,

Dear Sir or Madam:

Progressive Casualty Insurance Co currently has a major claims center located at 46 West Waterloo Rd, Akron OH 44319. Due to years of poor service from the existing carriers, the customer /users agreed to change all of their DID numbers to new DID numbers. Progressive Casualty Insurance Co placed an order for a block of 160 DID numbers with Verizon Business on 1/7/2013 to ride over existing circuit, BCBJPG1R0001 with a desired completion date of no later than March 10, 2013.

Verizon Business provided 160 DID numbers from Seven (7) different ranges. Aside from being an administrative nightmare these disparate numbers will not allow dial plan integration that is currently in place today. As a national company our overall strategy is to utilize VOIP phone systems which we have upgraded to the latest technology to function directly with SIP.

If our request for consecutive DID numbers or much larger blocks of numbers are not provided we will realize a severe financial impact associated with our 2013 budget as well as future Telco projects for Progressive Casualty Insurance Co.

Should there be any question please do not hesitate to contact me directly.

Cordially,



Amanda Ufholz
IT Provisioner Senior
Progressive Casualty Insurance Co Inc.