

**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. One of its customers, Bowling Green State University ("Bowling Green"), is in the midst of a project to replace a PBX system with a Voice Over IP system for the 6500 telephone lines on campus. As part of this project, Bowling Green is installing a system which will enable it to identify and configure a "911 location" for each individual space on campus. Each "911 location" will require a DID that is assigned to that space. In the event of a 911 call, this newly installed system will determine the specific location of the telephone on the data network, and set the ongoing caller ID to the DID of the "911 location".

The installation of this new system will require that Bowling Green assign a DID to each room on campus, but will provide its 911 PSAP with detailed information on the origination of 911 calls from campus telephones. With the mobility of IP phones within the campus, Bowling Green wants to ensure that it has a solution for 911 locations that does not require it to manually track the location of a telephone or make any manual location database updates.

Bowling Green State University has approximately 9,200 rooms that it would like to uniquely identify, so it has requested Buckeye to provide it with a block of 10,000 DIDs.

Buckeye has recently made a Central Office Code (NXX) assignment request to the Pooling Administrator seeking a block of numbers for Bowling Green because it needs numbers for dorm facilities for the purpose of E911 outbound calling. See Attachment A.

Attachment B consists of the Thousands-Block Application Form – Part 1A for tracking number 567-Bowling Green-OH-622355 which was prepared by Buckeye and submitted to the Pooling Administrator.

Buckeye prepared and submitted to the Pooling Administrator its Months To Exhaust and Utilization Certification Work Sheet – TN level. See Attachment C.

Buckeye has submitted a request for the block of 10,000 DIDs to the Pooling Administrator which was denied on March 28, 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 D.

Attachment E is a letter from Mr. Matt Haschak, director, security networking at Bowling Green State University explaining the need for a block of 10,000 DID numbers.

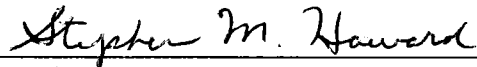
Given its concern for the public safety, it is reasonable for Bowling Green to request a block of 10,000 DID numbers that will enable it to have a solution for 911 locations that does not require it to manually track the location of a telephone number or make any manual location database updates.

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 Entry providing a waiver to the PAS and authorizing assignment of the numbering resources that Buckeye has requested on behalf of Bowling Green State University.

Respectfully submitted,

BUCKEYE TELESYSTEM, INC.



Stephen M. Howard

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

(614) 464-5401

(614) 719-4772 (fax)

smhoward@vorys.com

Attorneys for Buckeye TeleSystem, Inc.

Attachment A

Central Office Code (NXX) Assignment Request Part 1 December 9, 2005

Tracking
Number: 567-BOWLNGGREN-OH-622355

Full NXX: Dedicated
Customer

Type of
Application: ☐ New ☐ Change ¹ ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
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
mail: tcunningham@buckeye-telesystem.com

E-

Code Administrator: ²

Name: Michael Ortega

Address: 46000 Center Oak Plaza

City,State,Zip: Sterling ,VA ,20166

Phone: 571-434-5348 FAX: 571-434-5502

1.2 NPA: 567 NXX: ³ 326 LATA: 326 OCN: ⁴ 7608
Parent Company's OCN(s) 7608

Switching Identification(Switch Entity/POI) ⁵ TOLDOHPGDS0

Locality/City/Wire Center: BOWLING GREEN

Rate Center: ⁶
BOWLNGGREN

Homing Tandem Operating Co: ⁷ FRONTIER Tandem Homing CLLI
⁸ BWLGOHXA51T

1.3 Dates: Date of Request Effective Date: ⁹ ¹⁰
Application: 03/28/2013 06/02/2013

☐ 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? Yes _____ No X

1.4 a) Type of company/entity requesting the code: CAP OR CLEC (LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) 567-348

d) Codes that are undesirable, if any The 3rd digit in the NXX can not be a 2

e) Type of change (Mark **all** that apply)

☐ OCN-Intra-company ¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem Homing
CLLI

☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA ☐ Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☐ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): DEDICATED CUSTOMER - College needing numbers for dorm facilities for purpose of E911 outbound calling.

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments:

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 Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site
(<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁴

Teri Cunningham

Signature of Code Applicant

Carrier
Relations
Coord -
TN
Admin

Title

03/28/2013

Date

- ¹ Identify type and reason for change(s) in Section 1.4(e).
- ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- ³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
- ⁴ 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia TM Routing Administration (TRA) on 732-699-6700.
- ⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸ 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, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
- ¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.
- ¹¹ Select if you are the current Code Holder
- ¹² Select if you are not the current Code Holder
- ¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- ¹⁴ An incomplete form may result in delays in processing this request.

Attachment B

TBPAG Attachment I - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 567-
BOWLNGGREN-
OH-622355
Full NXX: Dedicated
Customer

Type of Application: ☐ New ☐ Change i ☐ Disconnect

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: iv 7608 Parent Company's OCN 7608

Number of Thousands-Blocks Requested : 10

Switching Identification(Switch Entity/POI) : v TOLDOHPGDS0

City or Wire Center Name : BOWLING GREEN Rate Center: vi BOWLNGGREN

Rate Center Sub Zone:

1.3 Dates:

Date of Application: vii 03/28/2013

Requested Block Effective Date: viii
06/02/2013

☐ 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) 567-348
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any The 3rd digit in the NXX can not be a 2
- 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) N/A

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.

Teri Cunningham

Signature of Block Applicant

<u>Carrier</u>	
<u>Relations</u>	
<u>Coord -</u>	<u>03/28/2013</u>
<u>TN</u>	
<u>Admin</u>	
<u>Title</u>	<u>Date</u>

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: 567-BOWLNGGREN-OH-622355Date: 03/28/2013OCN: 7608Company Name: BUCKEYE TELESYSTEM, INC. - OHRate Center: BOWLNGGRENList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 419-315 419-728Name 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: 3019B. Assigned Numbers: 7981C. 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 419-315-0 419-315-2 419-315-3 419-315-4 419-315-5 419-315-6 419-315-7 419-315-8Code(s) or 419-315-9

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

<u>1</u>	<u>72</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>
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F. Forecast - Next 12 months⁴

<u>10</u>	<u>10010</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 1676.667

H. Months
to Exhaust⁵
= $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

3019

Months To Exhaust

1.801

I.
Utilization⁶
= $\frac{\text{Assigned Numbers(B) - Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$
72.555

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))

Attachment D

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 567-
BOWLNGGREN-
OH-622355

Date of Application: 03/28/2013 Effective Date: _____
Date of Receipt: 03/28/2013 Date of Response: 03/28/2013

Service Provider Name: BUCKEYE TELESYSTEM, INC. - OH
(Telcordia™ LERG™
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): ¹ TOLDOHPGDS0
Rate Center: BOWLNGGREN
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 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.)



BOWLING GREEN STATE UNIVERSITY

Office of the Chief Information Officer
209 Hayes Hall
Bowling Green State University
Bowling Green, Ohio 43403-0171
419.372.7712 (V)
419.372.7723 (T)

March 26, 2013

Matt Mishler
National Account Manager
Buckeye Telesystem

Re: Request for Additional DIDs

Matt,

Bowling Green State University is in the midst of a project to replace our Avaya PBX with a Cisco Voice over IP system for the 6500 telephone lines on campus. As part of the Cisco deployment, we are installing Cisco's Emergency Responder, which will enable us to identify and configure a "911 location" for each individual space on campus. Each "911 location" will require a DID that is assigned to that space. In the event of a 911 call, the Emergency Responder will determine the specific location of the telephone on the data network, and set the outgoing caller ID to the DID of the "911 location".

This will require us to assign a DID to each room on campus, but will provide our 911 PSAP with detailed information on the origination of 911 calls from campus telephones. With the ease of relocating IP phones within the campus, we want to ensure that we have a solution for 911 locations that does not require us to manually track the location of a telephone or make any manual location database updates.

BGSU has approximately 9,200 rooms that we would like to uniquely identify, so we are requesting a block of 10,000 DIDs.

Please let me know if you have any questions, or need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Haschak". The signature is stylized with a large "M" and a long, sweeping underline.

Matt Haschak
Director, Security & Networking

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/29/2013 9:00:06 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.