



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

April 1, 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**

<b>In the Matter of the Commission's</b>	)	
<b>Consideration of Telephone Safety Valve</b>	)	<b>Case No. 10-0884-TP-UNC</b>
<b>Requests and Other Number Resource</b>	)	
<b>Related Filings</b>	)	

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

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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 March 15, 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.<sup>1</sup> 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

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<sup>1</sup> 47 CFR 52.15(g)(4)

carrier's inability to satisfy a specific customer request.”<sup>2</sup> 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.<sup>3</sup> Therefore, this Commission has the authority to overturn the PA's decisions under the appropriate circumstances.

### **Cincinnati Children's Hospital Medical Center Request**

In the immediate case, CBT has a request from Cincinnati Children's Hospital Medical Center (“CCHMC”) for 10,000 contiguous numbers to be used to fulfill its anticipated growth in the Cincinnati area over the next three to five years. As explained in its request (see Attachment A), CCHMC has nearly exhausted the two NXXs that are currently assigned to it in the Cincinnati rate center. In addition to normal growth that will rapidly deplete the remaining 1,500 numbers in its current inventory, CCHMC has several major expansions planned that it anticipates will use over 6,000 numbers within the next two years. In order to have numbers available for these new facilities and to manage its on-going telecommunications needs, CCHMC has requested a full NXX to be assigned from the Cincinnati rate center.

CCHMC has requested that the third digit of the new NXX be “7” or “8” so that it will be compatible with CCHMC's existing 5-digit dialing plan. CCHMC already utilizes the digits 2, 3, 4, and 6 for in-house and DID extensions, while the digits 1, 5, and 9 are used for feature codes. Securing an NXX with these parameters will enable CCHMC to maintain its existing dialing plan for at least five more years.

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<sup>2</sup> 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.

<sup>3</sup> *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**

March 12, 2013

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

Cincinnati Children's NXX Request

To Whom It May Concern

CCHMC operates 3 separate private branch exchange (“PBX”) systems to serve a main hospital, 9 outpatient clinics, 13 administrative office buildings and the Ronald McDonald house. These facilities combined use over 18,500 of a total of 20,000 DID numbers. Currently, CCHMC possesses the entire NXX ranges of 636-0000 thru 9999 and 803-0000 thru 9999.

Due to a series of new buildings and overall growth CCHMC has exhausted the overwhelming majority of its current DID numbers. With that being said, CCHMC is formally requesting a new full NXX from the Cincinnati Rate Center. In CCHMC’s current configuration, the dial plan will allow for the third number of the NXX to be 7 or 8 as we are currently 5 digit dial. The digits 2, 3, 4, and 6 are utilized for in house and DID extensions. The digits 1, 5, and 9 are used for feature codes. The CCHMC dial plan has been established for over 15 years. Reconfiguration of the CCHMC dial plan along with communication to our users would take an extended amount of time and require hundreds of man-hours to facilitate the change. At our current growth rate and expansion, CCHMC expects this new NXX to last from 3-5 years at which point CCHMC will most likely move to 7 or 10 digit dial.

In addition to normal growth that requires the use of new numbers, CCHMC has several major expansions planned for which it will need over 6,000 new numbers within the next two years. Specifically, currently planned expansions include:

- A new 15 story research facility on the CCHMC main campus in Cincinnati

- A new urgent care outpatient clinic in Green Township
  - Expansion of the Eastgate clinic
  - Construction of a new outpatient clinic in Clermont County
  - Occupy 2 additional floors in the 660 Lincoln building
  - Construction of the new Light Amplification by Stimulated Emission of Radiation building
  - Two new wireless phone initiatives. This project also has a high potential for adding significantly more phones in the future. To a point where every Doctor, Nurse or Clinical Manager would carry a wireless phone. Adding the need for thousands of more numbers
  - Several in-house construction projects
- Any remaining numbers from the new NXX would be retained in CCHMC's inventory to allow for the flexibility to manage its telecommunication needs and to quickly incorporate into its dial plan future expansions.

Sincerely,

Anthony Davis  
Sr. Systems Analyst  
Cincinnati Children's Hospital Medical Center

# **ATTACHMENT B**
















## Pooling Administration System





 doniso.cozad@cinbell.com (SP)

[Sign Out](#)

Time : 03/15/2013 08:29:07 PM EDT

-  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

### Request Resources

States \* OHIO   
NPA \* 513   
Rate Center \* CINCINNATI   
OCN \* 9348-CINCINNATI BELL, INC.  
Type of Application: Full NXX for Dedicated Customer 

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## Pooling Administration System

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- 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

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 denise.cozad@cinbell.com

#### Pooling Administrator<sup>1</sup>:

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 Administrator<sup>2</sup>:

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 Needed<sup>3</sup> NO

NPA 513

NXX<sup>3</sup>

LATA<sup>3</sup> 922

OCN<sup>4</sup> 9348-CINCINNATI BELL, INC.

Parent Company OCN<sup>5</sup> 9348

Number of

Thousands-Blocks Requested 10

Locality/City/Wire Center

Switch Identification CNCNOHAVDS1  
(Switching)

Identity/POI) Code <sup>v.5\*</sup>

Rate Center <sup>vi.8</sup> CINCINNATI

Rate Center Sub  
Zone

Homing Tandem  
Operating Company <sup>-7</sup> CINCINNATI BELL INC

Homing Tandem  
CLLI <sup>8\*</sup> CNCNOHWS20W

### 1.3 Dates

Date of  
Application <sup>vii</sup> 03/15/2013

Requested  
Effective date 05/20/2013 MM/DD/YYYY  
Code <sup>viii.9,10\*</sup>

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

Expedited  
Explanation

### 1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of  
Company\* Incumbent Local Exchange Carrier (ILEC)

b) Type of  
Service\* Wireline

c) Code  
Assignment  
Preference 513-495  
(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 N/A  
be keeping( the  
remainder of the  
blocks will be  
given to the pool)

### 1.5 Type of Request\*

☐ Initial ☒ Growth

Pooling  
Indicator <sup>13</sup> ☒ 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

Submit 14

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.<sup>14</sup>

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.

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# Pooling Administration System

donise.cozad@cinbell.com (SP)

Sign Out

Time : 03/15/2013 08:49:20 PM EDT

## Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>

Date: Friday, March 15, 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: denise.cozad@cinbell.com

A. Available Numbers:\* 566648

B. Assigned Numbers:\* 1174630

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 calculation<sup>2</sup>:\* 0

List excluded Code(s) or Block(s)

E. Growth History Previous 6-months<sup>3</sup>.\*

Month 1	659	Month 2	1454
Month 3	-3414	Month 4	-2620
Month 5	-2559	Month 6	-4080

F. Forecast Next 12 months<sup>4</sup>.\*

Month 1	-1760	Month 2	-1760
Month 3	-1760	Month 4	-1760
Month 5	-1760	Month 6	-1760
Month 7	-1760	Month 8	-1760
Month 9	-1760	Month 10	-1760
Month 11	-1760	Month 12	-1760

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) -1760.0

H. Months to Exhaust<sup>5</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested  
1

A. Available Numbers  
566648

H. Months to Exhaust  
-321.959

I. Utilization<sup>6</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
Explanation 67.458

Continue

Show Calculations

Cancel

- <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, § 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))

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


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## Pooling Administration System

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Time : 03/15/2013 08:49:56 PM EDT

-  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)<sup>1</sup>

Your Utilization calculates to 67.458%. 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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**Commission of Ohio Docketing Information System on**

**4/1/2013 3:58:10 PM**

**in**

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

Summary: Petition of Cincinnati Bell Telephone Company LLC 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