



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

May 9, 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 May 1, 2013 CBT filed a request with the PA seeking an entire NXX in the Clermont 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 (“FCC”). 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.

In its Third Report and Order in the Numbering Resource Optimization proceeding, the FCC found 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

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

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.

### **Total Quality Logistics’ Request**

In the immediate case, CBT has a request from Total Quality Logistics (“TQL”) for 10,000 contiguous numbers in the Clermont rate center to be used for its current and future telecommunications needs. TQL currently has five offices in the greater Cincinnati area and 15 satellite offices around the country and anticipates opening four to six new satellite offices each year. As explained in TQL’s letter (see Attachment A), calls to all TQL employees/offices currently come in via a single 800 number or TQL’s main number and callers must enter the extension of the party they are trying to reach or enter “0” to reach an operator who redirects the call to the proper party. With almost 5,000 internal extensions, this “single number” system is no longer cost effective. Therefore, TQL is in the process of switching from this “single number” auto attendant process to a direct dial numbering plan for all current and future employees. The new NXX will enable TQL to assign all employees numbers from this new 513-NXX and have all incoming and outgoing calls automatically routed over TQL’s MPLS network to the appropriate party.

In order to ease the transition to the new dialing plan, TQL has requested a full NXX in which the third digit is “5” (“NX5”) so that it is consistent with TQL’s current

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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.*

internal five-digit extension system and will enable employees to keep the same five-digit extension numbers they are currently assigned. Maintaining the same extensions will ease the transition to the new Direct Inward Dial service for employees and customers and minimize implementation costs for TQL. TQL will use approximately 5,000 numbers as soon as its new telephone system is set up and will use the remainder of the numbers to support its growth over the next several years.

CBT has reviewed its number inventory and has no unopened NXXs in the Clermont 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 Months to Exhaust 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 Clermont 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**

Cincinnati Bell Telephone  
Stephanie Allen  
Manager, Major Markets  
Cincinnati, Ohio

April 25, 2013

Re: NXX DID request

Dear Stephanie,

As you know, TQL continues to experience exceptional growth and is now the 2<sup>nd</sup> largest freight brokerage company in the country. Since our founding in 1997, we have averaged 30% year over year growth and have been recognized both locally and nationally for our rapid company expansion and unique culture.

We currently have five (5) office locations in the greater Cincinnati area (Eastgate headquarters, Milford, Erlanger, Glenway Crossing, and West Chester) and (15) satellite offices located in major metropolitan areas across the country (Cleveland OH, Dayton OH, Columbus OH, Louisville KY, Lexington KY, Indianapolis IN, Charleston SC, Charlotte NC, Denver CO, Austin TX, Tampa FL, Orlando FL, Ft. Lauderdale, FL and (2) offices in Chicago IL). These facilities support over 2100+ employees and 4600+ telephones (each Broker has two phones). Our growth strategy entails opening four (4) to six (6) new satellite offices every year. This year, we are working on plans for new offices in Houston TX, Nashville TN, Jacksonville FL, Detroit MI and Pittsburgh PA.

In order to support our current and future telecom needs, a new state of the art telecommunications system was implemented that has increased our platform reliability, functionality and capacities. The system is centralized in design, meaning it physically resides at our corporate headquarters in Cincinnati OH, and provides telecommunication services to all company locations. The services include Dedicated PRI access for long distance/800 service and Dedicated PRI access for local calling and fax applications. In addition to the above, we have transitioned to a new 5-digit dialing plan.

INTEGRITY, DISCIPLINE, EXECUTION AND COMMUNICATION - OTHERS SAY IT; WE LIVE IT.

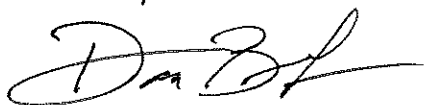


Our customers and carriers contact us via a single 800 number (800-580-3101) or by our main listed number (513-831-2600). The inbound calls are answered by an auto attendant system that prompts callers to manually input the 5-digit extension number of the party they are trying to reach. If the caller does not input a 5-digit extension, or hits "0", the call is routed to a central answering group which then redirects the call to the proper party. Based upon studies we have conducted, 48% of all callers are pressing "0" or failing to input an extension number. With the high volume of inbound calls that we generate on a daily basis, this type of call routing process is costly and inefficient.

As a result, we now have the challenge of transforming the existing company-wide "single number" auto attendant call process to a "direct dial" contact design. This will enable us to realize operational efficiencies, increase our customer's calling experience and reduce costs. In order to effectively manage this transition, we will need to convert to Direct Inward Dial service for all existing and future employees. We would like to formally request a NXX block of 10,000 contiguous DID numbers where the NXX 3<sup>rd</sup> digit is a "5" (xx5-xxxx). The full block of 10,000 DID numbers will be required due to the assignment of existing extension numbers ( approximately 5000 total) falling throughout the entire range of NXX numbers, as well as to accommodate future company growth. This will allow us to leverage our existing 5-digit dialing plan (extensions begin with "5" ex. 51578) and will enable us to deploy DID numbers without requiring a change to every employees' extension number, or complicate the digit translation processes in the Telco CO or TQL PBX.

Please review and submit this request to the Public Utilities Commission of Ohio to assist us with our telecommunications needs. If there are any questions, please feel free to contact me at 513-831-2600 ext. 51578.

Thank you.

A handwritten signature in black ink, appearing to read "Don Brubaker", with a stylized, cursive script.

Don Brubaker  
Telecommunications Manager  
Total Quality Logistics

# **ATTACHMENT B**

























## Pooling Administration System

 deniso.cozad@cinbell.com (SP)

[• Sign Out](#)

Time : 05/01/2013 07:28:37 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

Your request has been successfully submitted.  
The Tracking Number for this request is: 513-CLERMONT-OH-629972

[Return to Inbox](#)























[View Forms](#)

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Time : 05/01/2013 07:16:47 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 \* CLERMONT

OCN \* 9348-CINCINNATI BELL, INC.

Type of Application: Full NXX for Dedicated Customer

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## Pooling Administration System

denise.cozad@cinbell.com (SP)

Time : 05/01/2013 07:21:16 PM EDT

• Sign Out

- ☐ 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

Type of Application: New Code

Part1/1A

## 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>1</sup> NO

NPA 513

NXX<sup>3</sup>LATA<sup>4</sup> 922OCN<sup>4</sup> 9348-CINCINNATI BELL, INC.Parent Company OCN<sup>4</sup> 9348

Number of  
Thousands-Blocks 10  
Requested

Locality/City/Wire  
Center

Switch Identification TBSCOHTODS0  
(Switching)

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

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

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> 05/01/2013

Requested  
Effective date 07/06/2013 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 BIRADS. The 45-calendar day nationwide minimum interval cut-over for BIRADS will not begin until input into BIRADS 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

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Time : 05/01/2013 07:26:55 PM EDT

- ☒ Individual Block Requests
- ☒ CO/NXX Code Requests
  - ☒ New Code Request
  - ☒ Code Modification
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  - ☒ 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<sup>1</sup>

Date: Wednesday, May 1, 2013

OCN 9348

Company Name CINCINNATI BELL, INC.

Rate Center: CLERMONT

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

513-529-A, 513-553-A, 513-688-A, 513-732-A, 513-735-A, 513-752-A, 513-753-A, 513-797-A, 513-943-A, 513-947-A

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: 44751

B. Assigned Numbers: 52449

C. Total Numbering Resources: 97200

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	-339	Month 2	-107
Month 3	-155	Month 4	522
Month 5	-61	Month 6	-179

F. Forecast Next 12 months<sup>4</sup>:

Month 1	-53	Month 2	-53
Month 3	-53	Month 4	-53
Month 5	-53	Month 6	-53
Month 7	-53	Month 8	-53
Month 9	-53	Month 10	-53
Month 11	-53	Month 12	-53

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) -53.0

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

Block Requested  
1

A. Available Numbers  
44751

H. Months to Exhaust  
-844,358

I. Utilization<sup>6</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
Explanation 53.960

<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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-  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 53.960%. 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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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/8/2013 6:41:42 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