



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

February 11, 2014

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 Extended Territories LLC for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachment 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". The signature is fluid and cursive.

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)	Case No. 10-884-TP-UNC
Consideration of Telephone Safety Valve)	
Requests and Other Number Resource)	
Related Filings)	

**PETITION OF CINCINNATI BELL EXTENDED TERRITORIES LLC
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

Cincinnati Bell Extended Territories LLC (“CBET”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBET request for numbering resources. On February 3, 2014, CBET filed a request with the PA for an NXX in the Dayton rate center to establish a Location Routing Number (“LRN”) for a new soft switch that it is deploying. CBET’s request was denied on the grounds that CBET has not satisfied the utilization level and months-to-exhaust (“MTE”) criteria established by the Federal Communications Commission and outlined in the Central Office Code Assignment Guidelines (“COCAG”).¹ 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.² For the reasons set forth below, CBET submits that the Commission is justified in overturning the PA’s decision and granting CBET’s request for a new NXX to establish an LRN for its new switch.

¹ 47 CFR 52.15(g)(3)(iii); 47 CFR 52.15(h); *Central Office Code (NXX) Assignment Guidelines (COCAG)*, ATIS-0300051, Alliance for Telecommunications Industry Solutions (November 11, 2011), Section 4.3.1.

² 47 CFR 52.15(g)(4). Also, see *COCAG*, Section 4.1.3.

The new soft switch will replace an existing switch that is nearing capacity. Although CBET will eventually decommission its existing switch and transition its subscribers to this new switch, the move will not be a flash cut from one switch to the other. CBET will begin moving subscribers to the new switch during the second quarter of 2014 and expects the transition to be completed by year-end. Because the two switches will be deployed simultaneously for several months, CBET requires a unique LRN for the new switch.³

Due to the specific requirements for LRN assignment,⁴ none of CBET's existing numbers can be used as an LRN. Upon receipt of the new NXX, CBET will keep the "0" thousand-block and return the remaining blocks to the number pool. CBET will be able to port numbers from its existing numbering resources to the new switch once an LRN is assigned for the switch, so it does not anticipate the need for additional numbering resources for this switch beyond this initial request. All of the numbers assigned to the existing switch will be ported to the new switch when the old switch is retired.

As shown on the attached Pooling Administration System Worksheet (Attachment A), CBET's February 3, 2014 application was denied because CBET does not satisfy the utilization and MTE criteria for receipt of growth numbering resources.

CBET requests that the Commission overturn the PA's decision and direct the PA to grant CBET's request for a new NXX in the Dayton rate center to establish an LRN so that CBET can proceed with deployment of its new switch.

³ A Location Routing Number is the ten-digit (NPA-NXX-XXXX) number assigned to a switch and is used for routing in a local number portability environment. An LRN is required for each LATA served by the switch.

⁴ See, *Location Routing Number (LRN) Assignment Practices*, ATIS-0300065, Alliance for Telecommunications Industry Solutions, (September 30, 2011).

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 Extended
Territories LLC

February 11, 2014

ATTACHMENT A

Pooling Administration System	
 denise.cozad@cinbell.com (SP) • Sign Out	
Time : 02/03/2014 01:39:17 PM EST	
<div> Individual Block Requests</div> <div> CO/NXX Code Requests</div> <div><div> New Code Request</div><div> Code Modification</div><div> Code Disconnect</div><div> Copy Code Request</div></div> <div> Withdraw Pending Requests</div> <div> Confirm Resources In Service</div> <div> Donate Blocks</div> <div> Submit Forecast</div> <div> Search Forms</div> <div> Reports</div> <div> User Profile</div>	<p>Your request has been successfully submitted. The Tracking Number for this request is: 937-DAYTON-OH-699916</p> <div><div>Return to Inbox</div><div>View Forms</div></div>
<div> <div>Question? Email us © 1997-2012 Neustar, Inc. Legal Notice</div></div>	

Pooling Administration System	
denise.cozad@cinbell.com (SP) • Sign Out	
Time : 02/03/2014 01:16:43 PM EST	
<div><div>Individual Block Requests</div><div>CO/NXX Code Requests</div><div>New Code Request</div><div>Code Modification</div><div>Code Disconnect</div><div>Copy Code Request</div><div>Withdraw Pending Requests</div><div>Confirm Resources In Service</div><div>Donate Blocks</div><div>Submit Forecast</div><div>Search Forms</div><div>Reports</div><div>User Profile</div></div>	<div><div>Request Resources</div><div>States * OHIO</div><div>NPA * 937</div><div>Rate Center * DAYTON</div><div>OCN * 309B-CINCINNATI BELL EXTENDED TERRITORIES LLC - OH</div><div>Type of Application: Full NXX for LRN</div><div>Request Blocks to be Assigned</div><div><input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9</div><div>If requesting more than one blocks, do you want multiple effective dates? * <input type="radio"/> Yes <input checked="" type="radio"/> No</div><div>If requesting more than one block, do you want multiple switches? * <input type="radio"/> Yes <input checked="" type="radio"/> No</div><div><div>Continue</div><div>Cancel</div></div></div>
<div>neustar</div> <div>Question? Email us © 1997-2012 Neustar, Inc. Legal Notice</div>	

Pooling Administration System	
denise.cozad@cinbell.com (SP) • Sign Out	
Time : 02/03/2014 01:17:02 PM EST	
<div>Individual Block Requests</div> <div>CO/XXX Code Requests</div> <div>New Code Request</div> <div>Code Modification</div> <div>Code Disconnect</div> <div>Copy Code Request</div> <div>Withdraw Pending Requests</div> <div>Confirm Resources In Service</div> <div>Donate Blocks</div> <div>Submit Forecast</div> <div>Search Forms</div> <div>Reports</div> <div>User Profile</div>	<div>Type of Application: New Code Part1/1A</div> <div>View Pool Replenishment Status</div> <div>1.1 Contact Information :</div> <div>Code/Block Applicant:</div> <div>Company/Entity Name CINCINNATI BELL EXTENDED TERRITORIES LLC - OH</div> <div>Headquarters Address 201 E 4th Street</div> <div>City Cincinnati</div> <div>State OH</div> <div>Zip 45202</div> <div>Contact Name Denise S Cozad</div> <div>Contact Address 209 E4th Street, 121-1075</div> <div>City Cincinnati</div> <div>State OH</div> <div>Zip 45202</div> <div>Contact Phone 513-566-4130</div> <div>Contact Fax 513-651-9089</div> <div>Email denise.cozad@cinbell.com</div> <div>Pooling Administrator¹:</div> <div>Name Agnos Rom</div> <div>Address 1800 Sutter St</div> <div>City Concord</div> <div>State CA</div> <div>Zip 94520</div> <div>Telephone 925-363-7650</div> <div>Fax 925-363-7681</div> <div>Email agnos.rom@neustar.biz</div> <div>Code Administrator²:</div> <div>Name Michael Ortega</div> <div>Address 46000 Center Oak Plaza</div> <div>City Sterling</div> <div>State VA</div> <div>Zip 20166</div> <div>Phone 571-434-5348</div> <div>Fax 571-434-5502</div> <div>1.2 General Information</div> <div>LRN Needed³ YES</div> <div>NPA 937 NXX³ LATA* 328</div> <div>OCN⁴ 309B-CINCINNATI BELL EXTENDED TERRITORIES LLC - OH</div> <div>Parent Company OCN* 309B</div> <div>Number of Thousands-Blocks 1 Requested</div> <div>Locality/City/Wire Center</div> <div>Switch Identification (Switching Identity/POI) Code ⁵ DAYTON</div> <div>Rate Center⁶ DAYTON Rate Center Sub Zone</div> <div>Homing Tandem Operating Company ⁷ CINCINNATI BELL EXTENDED TERRITOF Homing Tandem CLLI⁸ CNCNOHWS20W</div>

1.3 Dates

Date of Application¹¹ 02/03/2014
Requested Effective date 04/10/2014 MM/DD/YYYY
Code^{11,9,10}

☒ 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 (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 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

<div>Submit 14 Cancel</div>	
<div>Part1A.Foot Notes Part1.Foot Notes</div>	
<p>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</p> <p>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.</p>	
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Pooling Administration System																																										
<div style="font-size: 0.8em;"> deniso.cozad@cinbell.com (SP) • Sign Out </div> <div style="font-size: 0.7em; margin-top: 5px;"> Time : 02/03/2014 01:27:12 PM EST </div> <div style="font-size: 0.7em; margin-top: 5px;"> <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Individual Block Requests <input checked="" type="checkbox"/> CO/NXX Code Requests <input checked="" type="checkbox"/> New Code Request <input checked="" type="checkbox"/> Code Modification <input checked="" type="checkbox"/> Code Disconnect <input checked="" type="checkbox"/> Copy Code Request <input checked="" type="checkbox"/> Withdraw Pending Requests <input checked="" type="checkbox"/> Confirm Resources In Service <input checked="" type="checkbox"/> Donate Blocks <input checked="" type="checkbox"/> Submit Forecast <input checked="" type="checkbox"/> Search Forms <input checked="" type="checkbox"/> Reports <input checked="" type="checkbox"/> User Profile </div> <div> Months to Exhaust and Utilization Certification Worksheet - TN Level¹ Date: Monday, February 3, 2014 OCN 309B Company Name CINCINNATI BELL EXTENDED TERRITORIES LLC - OH Rate Center: DAYTON List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s) 937-260-4 937-262-7 937-281-A 937-396-2 937-401-1 937-449-0 937-528-6, 7 937-535-A 937-567-7, 8 937-610-A, 0, 1, 2, 3, 4, 5, 7, 9 937-734-A, 0 </div> </div> </div> <div style="margin-top: 10px;"> Code/Block Applicant: Doniso S Cozad Title: Technical Clerk 3 Phone: 513-566-4130 Fax: 513-651-9089 E-Mail: deniso.cozad@cinbell.com </div> <div style="margin-top: 10px;"> A. Available Numbers:* 17315 B. Assigned Numbers:* 19674 C. Total Numbering Resources:* 36989 D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation²:* 1000 List excluded Code(s) or Block(s) </div> <div style="margin-top: 20px;"> E. Growth History Previous 6-months³:* <table border="1" style="width: 100%; border-collapse: collapse; font-size: 0.8em;"> <tr> <td>Month 1</td><td>-19</td><td>Month 2</td><td>51</td></tr> <tr> <td>Month 3</td><td>89</td><td>Month 4</td><td>73</td></tr> <tr> <td>Month 5</td><td>-43</td><td>Month 6</td><td>141</td></tr> </table> </div> <div style="margin-top: 10px;"> F. Forecast Next 12 months⁴:* <table border="1" style="width: 100%; border-collapse: collapse; font-size: 0.8em;"> <tr> <td>Month 1</td><td>49</td><td>Month 2</td><td>49</td></tr> <tr> <td>Month 3</td><td>49</td><td>Month 4</td><td>49</td></tr> <tr> <td>Month 5</td><td>49</td><td>Month 6</td><td>49</td></tr> <tr> <td>Month 7</td><td>49</td><td>Month 8</td><td>49</td></tr> <tr> <td>Month 9</td><td>49</td><td>Month 10</td><td>49</td></tr> <tr> <td>Month 11</td><td>49</td><td>Month 12</td><td>49</td></tr> </table> </div> <div style="margin-top: 10px;"> G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 49.0 </div> <div style="margin-top: 10px;"> H. Months to Exhaust⁵ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G)) <table style="width: 100%; font-size: 0.8em;"> <tr> <td style="text-align: center;">Block Requested</td> <td style="text-align: center;">A. Available Numbers</td> <td style="text-align: center;">H. Months to Exhaust</td> </tr> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">17315</td> <td style="text-align: center;">353.367</td> </tr> </table> </div> <div style="margin-top: 10px;"> I. Utilization⁶ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 54.667 Explanation </div>	Month 1	-19	Month 2	51	Month 3	89	Month 4	73	Month 5	-43	Month 6	141	Month 1	49	Month 2	49	Month 3	49	Month 4	49	Month 5	49	Month 6	49	Month 7	49	Month 8	49	Month 9	49	Month 10	49	Month 11	49	Month 12	49	Block Requested	A. Available Numbers	H. Months to Exhaust	1	17315	353.367
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Block Requested	A. Available Numbers	H. Months to Exhaust																																								
1	17315	353.367																																								

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- 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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donise.cozad@cinbell.com (SP) • Sign Out	
Time : 02/03/2014 01:23:46 PM EST	
<div><div>Individual Block Requests</div><div>CO/NXX Code Requests</div><div> New Code Request</div><div> Code Modification</div><div> Code Disconnect</div><div> Copy Code Request</div><div>Withdraw Pending Requests</div><div>Confirm Resources In Service</div><div>Donate Blocks</div><div>Submit Forecast</div><div>Search Forms</div><div>Reports</div><div>User Profile</div></div>	<div>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</div> <div>Your Utilization calculates to 54.667%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</div> <div>Select One Option and Submit</div> <div><div><input checked="" type="radio"/> Return to the Months To Exhaust Form</div><div><input type="radio"/> Need to request a State Waiver</div><div><input type="radio"/> Received a State Waiver</div></div> <div><div>Submit</div><div>Cancel</div></div>
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2/11/2014 4:46:07 PM

in

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

Summary: Petition Petition of Cincinnati Bell Extended Territories LLC for Review of a Decision of the Number Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Extended Territories LLC