

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investi-	)	
gation into Telephone Numbering and	)	Case No. 10-884-TP-UNC
Number Assignment Procedures	)	

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PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC FOR REVIEW OF A  
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

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Teleport Communications America, LLC (“Teleport”), by its attorney and pursuant to 47 CFR § 52.15(g)(3)(iv), respectfully requests that the Public Utilities Commission of Ohio (“Commission”) review and overturn the Pooling Administrator's (“PA” or “NeuStar”) denial of Teleport's request for numbering resources, as more fully described herein.

Avnet, Inc. (“Avnet”) requested 600 consecutive telephone numbers to service its new facility. Avnet is a worldwide distributor of computer and embedded technology products and services. Avnet is consolidating three locations in Ohio along with two locations in Texas and California into one new location in Obetz, Ohio. The new 500,000+ sq. ft. facility is expected to immediately house 600 employees with plans to expand beyond that in the future. The numbering resources are needed to facilitate telephone service to this new facility and will be utilized in conjunction with Business – VoIP Service. Moreover, Avnet requested that the 600 consecutive numbers be assigned from a block where the first digit of the NXX is a 2, 3, 4, 5, 6, 7, or 8 for consistency with its existing network configuration and numbering plan.

The numbering resources in Teleport's numbering inventory are inadequate to meet Avnet's needs. As such, Teleport requested NeuStar to assign a block for use by Avnet in the Lockbourne rate center. That request was denied because Teleport only meets one of the two required FCC criteria to obtain numbering resources in the Lockbourne rate center. The FCC requires a months-to-exhaust ("MTE") of 6 months or fewer. While Teleport is at a 3.275 MTE, it does not meet the FCC required utilization factor of 75% or higher as Teleport's utilization is at 66.55%. Thus, only one of the FCC criteria is met in this case.

The FCC's rules identify a procedure whereby denial of a numbering resource request can be brought to the appropriate state commission for review. 47 CFR § 52.15(g)(3)(iv) provides as follows:

(iv) The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an Operating Company Number ("OCN"). The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state regulatory commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.

In addition, the FCC's December 12, 2001 Order in its Number Resource Optimization Report and Order, CC Docket No. 99-200, FCC No. 01-362, paragraph 64 states that, "States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." Teleport submits that Avnet's request

constitutes special circumstances and demonstrates a clear requirement that warrants the Ohio Commission's review and reversal of NeuStar's decision.

Attached to this request are copies of Teleport's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of Avnet's request.

For the reasons set forth herein, Teleport respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Lockbourne rate center to Teleport for use by Avnet.

Respectfully submitted,

Teleport Communications America, LLC

By:                     /s/ Jon F. Kelly                    

Jon F. Kelly  
AT&T Services, Inc.  
150 E. Gay St., Rm. 4-A  
Columbus, Ohio 43215

(614) 223-7928

Its Attorney

Part1A

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TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

Tracking  
Number: 614-  
LOCKBOURNE-  
OH-699514  
Individual Block  
Request

Type of  
Application: ☒ New ☐ Change ☐ Disconnect  
i

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

Company  
Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH

Headquarters  
Address: One AT&T Way

City, State,  
Zip: Bedminster, NJ, 07921

Contact  
Name: Lisa Loper

Contact  
Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07921

Phone: 908- FAX: 908-  
234-7622 234-8044 E-mail: lloper@att.com

Pooling Administrator: <sup>ii</sup>

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 <sup>iii</sup> \_\_\_\_\_

NPA: 614 LATA: 324 OCN: <sup>iv</sup> 7532 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entry/POI) : <sup>v</sup>  
WOTNOHEHAMD

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup>  
LOCKBOURNE

Rate Center Sub Zone: \_\_\_\_\_

### 1.3 Dates:

Date of Application: <sup>vii</sup> 01/31/2014 Requested Block Effective Date: <sup>viii</sup>  
03/03/2014

☐ 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) 614-669-6,5,7
- 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 <sup>ix</sup> ☐ Switching Id ☐ Part 1B

## Part1A

☐ OCN:Inter-company<sup>x</sup> ☐ 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](mailto:inc@atis.org) as of the date of this application.

Lisa Loper

Manager-Code 01/31/2014  
Administration

Signature of Block Applicant

Title

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 Telcordia<sup>TM</sup> LERG<sup>TM</sup> 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 Telcordia<sup>TM</sup> 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 CLLI<sup>TM</sup> tandem of the facilities based provider<sup>x1</sup>. Explanations of these terms may be found in the footnotes.

MTE Block

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Appendix 3

May 16, 2008

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>**  
**(Thousands-Block Number Pooling Growth Block Request)**

Tracking Number: **614-LOCKBOURNE-OH-699514**Date: **01/31/2014**OCN: **7532**Company Name: **TELEPORT COMMUNICATIONS  
AMERICA, LLC - OH**Rate Center: **LOCKBOURNE**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **NPA NXX BLOCK ID 614 662 A  
614 662 7 614 662 9**Name of Block Applicant: **Lisa Loper**Signature: **Lisa Loper**Title: **Manager-Code Administration**Telephone No.: **908-234-7622**FAX No.: **908-234-8044**E-mail: **lloper@att.com**A. Available Numbers: **489**B. Assigned Numbers: **1331**C. Total Numbering Resources: **2000**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):

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	<b><u>111</u></b>	<b><u>160</u></b>	<b><u>101</u></b>	<b><u>3</u></b>	<b><u>4</u></b>	<b><u>-109</u></b>
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MTE Block

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months<sup>3</sup>

F. Forecast

- Next 12 628 47 51 53 59 58 47 42 32 29 30 33months<sup>4</sup>G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 149.333H. Months  
to Exhaust<sup>5</sup>Numbers Available for Assignment to  
Customers(A)

=

Average Monthly Forecast(G)

Block Requested**1**Available Numbers**489**Months To Exhaust**3.275**

I.

Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers X 100 =  
= (D) 66.55Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation: \_\_\_\_\_

<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, section 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))



Part3

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November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAAG Part 3

Tracking Number : 614-  
LOCKBOURNE-OH-  
699514

Date of Application: 01/31/2014 Effective Date: \_\_\_\_\_  
Date of Receipt: 01/31/2014 Date of Response: 01/31/2014

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 7532  
Parent Company OCN: 7125

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): <sup>1</sup>

WOTNOHEHAMD

Rate Center:

LOCKBOURNE

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.**

## Part3

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\_\_\_\_ **Request withdrawn.**

Explanation:

\_\_\_\_ **Assignment activity suspended by the administrator.**

Explanation:

\_\_\_\_  
\_\_\_\_  
**Remarks:**  
\_\_\_\_  
\_\_\_\_  
\_\_\_\_

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



February 4, 2014

RE:

Avnet, Inc.  
5330 Centerpoint Pkwy  
Obetz, OH 43125

AT&T TNAC,

This Letter of Intent represents a request by Avnet, Inc. (Avnet) for 600 consecutive numbers for *BVOIP*. Avnet intends to order service, in the LOCKBOURNE rate center, on the LNS **KSCYMO09GT1(P)** / LEC **CLMBOHFQDS2** switch, pending AT&T's successful completion of the required testing. Avnet intends to activate these numbers within 180 days from AT&T's receipt of the numbers. Avnet is consolidating 3 locations in Ohio, as well as locations in California and Texas, into a new facility in Obetz, OH. The 500,000+ square foot facility will house 600 full time employees, with plans to expand beyond that.

Avnet currently has an existing network configuration and therefore **NXX-YYYY, N cannot start with 0,1 or 9.**

No restrictions on YYYY

Block 0 (0000-0999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 1 (1000-1999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 2 (2000-2999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 3 (3000-3999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 4 (4000-4999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 5 (5000-5999): \_\_\_\_\_ No restrictions \_\_\_\_\_


Block 6 (6000-6999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 7 (7000-7999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 8 (8000-8999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Block 9 (9000-9999): \_\_\_\_\_ No restrictions \_\_\_\_\_

Sincerely,

  
Brad Kenney  
Vice President  
Avnet, Inc.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/18/2014 4:55:50 PM**

**in**

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

Summary: Request for review of a decision of NeuStar - Pooling Administrator electronically filed by Jon F Kelly on behalf of Teleport Communications America, LLC