

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

**REQUEST OF FRONTIER NORTH INC. TO REVIEW DECISION
OF THE NEUSTAR POOLING ADMINISTRATOR**

Frontier North Inc. (“Frontier”) requests that the Commission reverse a decision of the NeuStar Pooling Administrator (“NeuStar”) denying access to numbers for one of Frontier’s customers. Frontier seeks this relief because there is a verifiable customer need for the numbers. On March 13, 2014, Frontier requested that NeuStar assign 1000 sequential direct inward dial (“DID”) telephone numbers for the Cleveland Clinic. The numbers are needed as part of Cleveland Clinic’s installation of a new PRI system at its Brunswick, Ohio location in the Brunswick rate center. Cleveland Clinic currently uses 330-741-7000 through 7199 for their internal extension numbers. This will allow Cleveland Clinic to use their existing internal extension numbers as their PRI numbers to avoid having to renumber all of their internal extensions.

Frontier submitted the numbering request to NeuStar because Frontier does not have the requested sequential DID numbers that Cleveland Clinic needs in the Brunswick rate center. On March 13, 2014, NeuStar denied the request for the Cleveland Clinic numbers on the grounds that Frontier did not meet the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines.

The FCC's rules set forth a procedure to bring the denial of a numbering resource by NeuStar to the appropriate state commission for review. 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 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 customer request." In addition, paragraph 64 says "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." *Id.*

The Cleveland Clinic request is consistent with paragraph 64 of the FCC order that empowers state commissions to grant customer requests seeking contiguous blocks of numbers. *Id.* Attached to this request are copies of Frontier's Thousand Block Application Forms (Attachment A), the Months-to-Exhaust Worksheet (Attachment B), a copy of the denial received from NeuStar (Attachment C) and a copy of the request from Cleveland Clinic (Attachment D).

In addition, Frontier has reacted in a timely manner to the customer's needs and believes the request for Commission intervention at this point is reasonable considering the customer's projected need.

For the reasons set forth herein, Frontier requests that the Commission expeditiously overturn the NeuStar decision to withhold the numbering resource that Frontier requested and grant the 1 000 sequential DID numbers to meet its customer's needs.

Respectfully submitted,

Frontier North Inc.

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Summary: Request Request of Frontier North, Inc. to Review Decision of the Neustar Pooling Administrator electronically filed by Michele L Noble on behalf of Frontier North Inc.