

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 AT&T OHIO FOR REVIEW OF A DECISION OF NEUSTAR - POOLING  
ADMINISTRATOR

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AT&T Ohio, 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 AT&T Ohio's request for numbering resources, as more fully described herein.

An Ohio customer, the United States General Services Administration ("GSA") on behalf of the Department of Transportation, Federal Aviation Administration ("FAA") has requested 400 consecutive numbers in the Cleveland rate center. The FAA is expanding its telecommunication infrastructure at the Cleveland Hopkins International Airport at 5800 Postal Road, Cleveland, Ohio. The installation will include three (3) ISDN-PRI circuits with 400 contiguous DID numbers. The block of 400 consecutive DID telephone numbers will meet the 12 month needs of the FAA and the long term plan will be to add additional numbers as the site grows. In order to have a 5 digit dialing plan, the FAA requested the numbers not start with a "9" or "0". The FAA is planning to install service and activate the numbers by May 20, 2014. This is reflected in the customer letter.

The Cleveland rate center, in the 216 area code, began number pooling in March 2003 and therefore number acquisition by a Number Pooling carrier is gained through an interface with the PA.<sup>1</sup> On April 15, 2014, AT&T Ohio submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and Utilization”) to the PA<sup>2</sup> using the Pooling Administration System (“PAS”). AT&T Ohio requested 1 number block in the Cleveland rate center and subsequently received an error message indicating the request would not process via the system without a state waiver.<sup>3</sup> The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate that existing resources in the rate center will both exhaust within 6 months and meet the 75% utilization level. The error message included calculations indicating that neither threshold was met.

Although AT&T Ohio has adequate telephone numbers in this rate center to satisfy incremental requests, without receiving additional numbers, the inventory cannot satisfy the customer’s specific need for 400 consecutive numbers. AT&T Ohio has no blocks available for assignment and is requesting a full code be opened from NANPA and assign one block to AT&T for use by this customer.

The FCC's rules identify a procedure whereby a 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:

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<sup>1</sup> The federal rules in 47 C.F.R. § 52.15 generalize responsibilities of NANPA and the PA under the heading “Central office code administration”.

<sup>2</sup> A copy of the Part1A and MTE worksheet are attached as Exhibit B.

<sup>3</sup> A copy of the error message is appended as the last page of Exhibit B.

(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." AT&T Ohio's submits that the FAA'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 AT&T Ohio's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of the GSA's letter of intent.

For the reasons set forth herein, AT&T Ohio respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Cleveland rate center to AT&T Ohio for use by the FAA.

Respectfully submitted,

AT&T Ohio

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

10-884.faa safety valve waiver request.4-21-14.docx

**Thousands-Block Application Form  
Part 1A****Type of Application (check one):**      ☒ **New**      ☐ **Change**<sup>i</sup>      ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**

Company Name: AT&T CORPORATION  
Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583  
Contact Name: PRISCILLA  
Contact Address: 2600 CAMINO RAMON, 2S850I City SAN RAMON State CA Zip 94583  
Phone: 925-824-5625 Fax: 925-355-9268  
E-Mail: pt3145@att.com

**Pooling Administrator<sup>ii</sup>:**

Contact

Name: Kevin Gatchell

Contact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520  
Phone: 925-363-8742 Fax: 925-363-7686  
E-Mail: kevin.gatchell@neustar.biz

**1.2 General Information****Check one:** No LRN needed ☒ **LRN needed**<sup>iii</sup> \_\_\_\_\_

NPA: 216 LATA: 320 OCN<sup>iv</sup>: 9321 Parent Company's OCN 9300  
Number of Thousands-Blocks Requested: 1

Switch Identification (Switching Entity/POI)<sup>v</sup>: BKPKOH26DH0 City or Wire Center Name \_\_\_\_\_  
Rate Center<sup>vi</sup>: CLEVELAND Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates**

Date of Application<sup>vii</sup>: 4/15/14 Requested Block Effective Date<sup>viii</sup>: \_\_\_\_\_  
Request Expedited Treatment? (See Section 8.6) Yes ☒ No \_\_\_\_\_

**1.4 Type of Service Provider Requesting the Thousands-Block:**

- a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: WIRELINE
- c) Thousands-Block(s) (NXX\_X) preference \_\_\_\_\_
- 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) \_\_\_\_\_.

**Thousands-Block Application Form**  
**Part 1A****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

Change block: Yes\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:

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Disconnect block: Yes\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

**1.6 Block Return**

- 
- a) Is this block Contaminated: Yes\_\_\_\_ or 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\_\_\_\_ or No\_\_\_\_
  - d) Has this block been protected from further assignment: Yes\_\_\_\_ or No\_\_\_\_
- 

Remarks: \_\_\_\_**SAFETY VALVE WAIVER REQUEST – General Services Administration**\_\_\_\_

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 ([www.atis.org/inc](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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<u>PRISCILLA TAYLOR</u>	<u>CODE ADMINISTRATOR</u>	<u>04/15/14</u>
Signature of Block Applicant	Title	Date

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## Thousands-Block Application Form Part 1A

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

**Section 1.3** The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

**Section 1.4** Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, inter-exchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

**Section 1.5** Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

**Section 1.6** Service Providers shall indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA must seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Thousands-Block Application Form  
Part 1A**

Foot Notes:

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<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>ix</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.



### Appendix 3 - Modified August 6, 2001

#### MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level <sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Date: 4/15/14 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: CLEVELAND NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (120 ); NPA/NXX-X (439 )

Name of Block Applicant: PRISCILLA TAYLOR Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-824-5625 FAX No.: 925-355-9268

E-Mail: [PT3145@att.com](mailto:PT3145@att.com)

A. Available numbers: 24953

B. Assigned numbers: 850652

C. Total Numbering Resources: 1638920

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None

List excluded Code(s) or Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
	<u>-193</u>	<u>-30</u>	<u>-3</u>	<u>-75</u>	<u>-77</u>	<u>-3</u>						
E. Growth History – Previous 6 months <sup>2</sup>												
	<u>0</u>	<u>22</u>	<u>1000</u>	<u>48</u>	<u>0</u>	<u>49</u>	<u>-22</u>	<u>-147</u>	<u>-13</u>	<u>-23</u>	<u>-6</u>	<u>-9</u>
F. Forecast – Next 12 months <sup>3</sup>												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>186.5</u>											
H. Months to Exhaust <sup>4</sup>	<u>Numbers Available for Assignment to Customers (A)</u>								=	<u>133.796</u>		
	<u>Average Monthly Forecast (G)</u>											
I. Utilization <sup>5</sup>	<u>Assigned Numbers (B)</u>								* 100	=	<u>51.903</u>	
	<u>Total Numbering Resources (C) – Excluded Numbers (D)</u>											

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> 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>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</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>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

From: [agnes.rom@neustar.biz](mailto:agnes.rom@neustar.biz)  
To: [TAYLOR, PRISCILLA](#); [BLAKELY, SHANNON M](#)  
Cc: [PA\\_Part3@neustar.biz](mailto:PA_Part3@neustar.biz)  
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 216-CLEVELAND-OH-717839  
Date: Tuesday, April 15, 2014 12:45:43 PM

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## Pooling Administration System

Dated 15-April-2014

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 216-  
CLEVELAND-OH-  
717839

Date of Application:	<u>04/15/2014</u>	Effective Date:	<u>                    </u>
Date of Receipt:	<u>04/15/2014</u>	Date of Response:	<u>04/15/2014</u>

Service Provider Name: AMERITECH OHIO

(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN: 9321

Parent Company OCN: 9300

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

Block Contaminated(Yes or No) :	Disconnected :
If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): <sup>1</sup>	<b>bkpcoh26ds0</b>
Rate Center:	<b>CLEVELAND</b>
Rate Center Sub Zone:	

**X Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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.**

**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.)





28 March 2014

Patia Ellis  
AT&T Federal Government Program Manager

Dear Mrs. Patia Ellis,

This letter documents our requirements in relation to additional numbering resources. It is understood that AT&T may take this request to the state commission, if needed, to fulfill our request.

The General Services Administration, a Federal Government agency, on behalf of Department of Transportation, Federal Aviation Administration is expanding telecommunication infrastructure at the Cleveland Hopkins International Airport at 5800 Postal Road, Cleveland, Ohio. The installation will include three (3) ISDN-PRI circuits with 400 contiguous DID numbers. The block of 400 consecutive DID telephone numbers will meet the 12 month needs of the Department of Transportation and the long term plan will be to add additional numbers as the site grows.

The beginning numbers of the 5 digit extension will not start with "9" or "0", block all 900 and 976 type calling capabilities, all collect calling, and 3<sup>rd</sup> party billing capabilities. Domestic long distance (Interlata), Local Toll (Intralata), and International calling capabilities should be provided by Verizon Business using GSA's Network contract.

The three (3) PRIs are to have the following attributes:

1. Protocol – NI-2 (National)
2. Configuration Per PRI (See Below)
  - a. PRI A 23 B Channels and 1 D Channel
  - b. PRI B 23 B Channels and 1 D Channel (Backup D Channel)
  - c. PRI C 24 B Channels
3. Channel sequence is to be sequential
4. In-pulse digits should be 10 and out-pulse should be 10
5. Signaling Type – NFAS
6. Hunting is to be ascending on incoming and descending on outgoing
7. Terminate PRI T1 on a RJ-48 in FAA Telco Room
8. GFE provided CSU/DSU equipment
9. Glare Resolution Method – CPE Yields
10. Caller ID should be at the station number
11. Full Duplex with 1.544 MBs per PRI
12. Type of interface is Voice/Data
13. Full Period service availability
14. ESF/B8ZS & Outflow Calls
15. Outbound Caller Name: US GOVT FAA

We need to activate these three ISDN-PRI Circuits with 400 contiguous DID numbers on 20 May 2014. AT&T is our chosen service provider and we understand that they might escalate this request to the state utility commission. It's important that we know before the required service date whether or not this request will be granted.

  
Chris Olry  
Information Technology Representative  
317-226-5700 Office  
317-226-6735 Fax  
Christopher.Olry@GSA.gov

03/28/2014  
Date Signed

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

**Commission of Ohio Docketing Information System on**

**4/21/2014 10:42:46 AM**

**in**

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

Summary: Petition for review of a decision of NeuStar - Pooling Administrator electronically filed by Jon F Kelly on behalf of AT&T Ohio