

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)	

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

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, University Hospitals, has requested a block of 2,000 consecutive numbers in the Terrace rate center. University Hospitals is expanding to multiple locations in the geographic area covered by the 216 area code. More specifically, University Hospitals has purchased another building located at 20800 Harvard Road, Beachwood, Ohio, adding to numerous other sites it already operates in the that same geographic area, and will likely expand further in that same area. In order to provide telecommunications services at the 20800 Harvard Road and surrounding locations, and to streamline its dialing plan in preparation for conversion to centralized trunking, University Hospitals requires a block of 2,000 consecutive Direct Inward Dialing ("DID") numbers and anticipates that the new numbers will be put into operation within the next two years. Moreover, so that the new numbers are compatible with the existing dialing plan, University Hospitals is requesting that the prefix of the

newly assigned numbers end with the digit 8 (i.e., (216) NX8-XXXX). (The existing telecommunications system will not accept a block of DID's with a prefix starting with a 0, 1, or 9).

The numbering resources in AT&T Ohio's numbering inventory are inadequate to meet University Hospitals' needs. Neither are two consecutive, uncontaminated blocks available for assignment from the Number Pooling Inventory. As such, AT&T Ohio requested NeuStar to assign a new NXX code and allocate two blocks for use by University Hospitals in the Terrace rate center. That request was denied because AT&T Ohio does not meet the two required FCC criteria to obtain numbering resources in the Terrace rate center. The FCC requires a months-to-exhaust ("MTE") of 6 months or fewer. AT&T Ohio is at a 138.93 MTE due to the low growth forecast and inventory that does not qualify for donation. In addition, the FCC requires utilization of 75% or higher and AT&T Ohio is at 66.89%. Thus, neither 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." AT&T submits that University Hospitals' 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 University Hospitals' request.

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 Terrace rate center to AT&T Ohio for use by University Hospitals.

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

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Type of Application (check one): ☒ **New** ☐ **Change**ⁱ ☐ **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 TAYLOR
Contact Address: 2600 CAMINO RAMON, 3E700M City SAN RAMON State CA Zip 94583
Phone: 925-824-5625 Fax: 925-355-9268
E-Mail: pt3145@att.com

Pooling Administratorⁱⁱ:

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**ⁱⁱⁱ _____

NPA: 216 LATA: 320 OCN^{iv}: 9321 Parent Company's OCN 9300
Number of Thousands-Blocks Requested: 2

Switch Identification (Switching Entity/POI)^v: BCWDOH46DS0 City or Wire Center Name _____
Rate Center^{vi}: TERRACE Rate Center Sub Zone: _____

1.3 Dates

Date of Application^{vii}: 10/24/14 Requested Block Effective Date^{viii}: ASAP
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 NPA-NX8-0,1,2,3,4,5,6,7,8,9
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any NPA-NX1, NPA -NX2, NPA-NX3, NPA-NX4, NPA-NX5, NPA-NX6, NPA-NX7, NPA-NX9, NPA-NX0
- 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:

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 – UNIVERSITY HOSPITALS.**

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) or by contacting inc@atis.org as of the date of this application.

<u>PRISCILLA TAYLOR</u>	<u>CODE ADMINISTRATOR</u>	<u>10/27/14</u>
Signature of Block Applicant	Title	Date

Thousands-Block Application Form

Part 1A

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^{ix}. 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:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA

^{iv} 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).

^v 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.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} 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).

^{ix} 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 ¹ (Thousands-Block Number Pooling Growth Block Request)

Date: 10/28/14 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: TERRACE NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (12); NPA/NXX-X (26)

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

A. Available numbers: 46,542

B. Assigned numbers: 97,655

C. Total Numbering Resources: 145,994

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>108</u>	<u>58</u>	<u>-80</u>	<u>-22</u>	<u>35</u>	<u>-91</u>						
E. Growth History – Previous 6 months ²												
	<u>0</u>	<u>0</u>	<u>1953</u>	<u>29</u>	<u>-20</u>	<u>30</u>	<u>5</u>	<u>10</u>	<u>-94</u>	<u>-8</u>	<u>-63</u>	<u>-74</u>
F. Forecast – Next 12 months ³												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>332</u>											
H. Months to Exhaust ⁴	<u>Numbers Available for Assignment to Customers (A)</u>								=	<u>138.93</u>		
	<u>Average Monthly Forecast (G)</u>											
I. Utilization ⁵	<u>Assigned Numbers (B)</u>						* 100	=	<u>66.89</u>			
	<u>Total Numbering Resources (C) – Excluded Numbers (D)</u>											

Explanation:

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 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.

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

4 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)).

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

Pooling Administration System

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): ¹

BCWDOH46DS0

Rate Center:

TERRACE

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 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:

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





Jodi Molner
Operations Analyst

October 14, 2014

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Mary Brown
Client Account Manager
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Syracuse, NY 13202

Information Technology
University Hospitals Case Medical
Center
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BIS5095
Cleveland, Ohio 44106
216.286.7373 Phone

Dear Mary,

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

University Hospitals is expanding to multiple locations in the geographic area covered by area code 216. University Hospitals' has purchased another building located at 20800 Harvard, Beachwood, OH, already has multiple other sites in the same geographic area, and will likely continue to expand in that area. In order to provide to provide administrative, physician offices, research, administrative, lab space and other system services with phone services at the 20800 Harvard and surrounding locations, and to streamline our dial plan in preparation for conversion to central trunking, we require a consecutive block of 2000 DID's. Conversion to central trunking will result in a significant positive financial impact to the hospital system.

To meet the needs of our dial plan we are requesting that the prefix end in the digit 8. (The phone system will not accept a block of DIDs with a prefix starting with a 0, 1 or 9, i.e., 216-Nx8-xxxx). The numbers will be installed as DID's on new PRI's to be installed at 20800 Harvard Rd. This is an urgent request, as we need to install that PRI during the 2nd week of December 2014 to meet occupancy deadlines. Installation of these PRIs along with provision of 2000 DID numbers was originally requested on September 23, 2014. We expect that this block will meet our requirements for at least the next two years. We do not anticipate returning any numbers to AT&T.

AT&T is our service provider and we understand that they might escalate this request to the state utility commission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jodi Molner'.

Jodi Molner
Information Technology

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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