

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Consideration of Telephone Safety Valve)	Case No. 10-884-TP-UNC
Requests and Other Number Resource)	
Related Filings)	

**MOTION OF COX OHIO TELCOM, LLC
FOR REVIEW OF A DECISION OF
THE NORTH AMERICAN NUMBERING POOLING ADMINISTRATOR**

Cox Ohio Telcom, LLC ("Cox") is a certificated local exchange carrier providing service to primarily customers in the vicinity of Cleveland, Ohio. One of its customers, HMT Associates Inc. of Broadview Heights, Ohio is located in the BRECKSVL rate center and is in need of additional telephone numbers.

In response to its customer's need, Cox has recently made a Central Office Code (NXX) assignment request to the Pooling Administrator seeking a block of numbers for BRECKSVL rate center. Cox is near exhaustion of numbers due to the customer needing one hundred forty DID numbers. Because it must order a code, it is requesting 440-XXX-2. Cox does not meet the utilization criterion because the BRECKSVL rate center is a relatively slow growth rate center until now. See Attachment A.

Attachment B consists of the Thousands-Block Application Form – Part 1A for tracking number 440-BRECKSVL-OH-787005 which was prepared by Cox and submitted to the Pooling Administrator.

Cox prepared and submitted to the Pooling Administrator its Months To Exhaust and Utilization Certification Work Sheet – TN level. See Attachment C.

Cox has submitted a request for the block of 1000 numbers to the Pooling Administrator which was denied on December 1, 2004. The explanation for the denial given was as follows:

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.

See Attachment D.

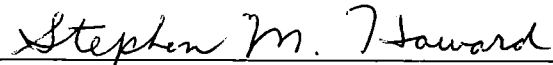
Attachment E is a letter from HMT Associates, Inc. requesting 140 new DID numbers.

The Commission has authority to review the PAS decision and issue a waiver to PAS authorizing assignment of the NPA-NXXs requested by Cox.

WHEREFORE, for the reasons set forth above, Cox respectfully requests that the Commission or its Attorney Examiner act expeditiously and issue an Entry providing a waiver to the PAS and authorizing assignment of the numbering resources that Cox has requested on behalf of its customer.

Respectfully submitted,

COX OHIO TELCOM, LLC



Stephen M. Howard

VORYS, SATER, SEYMOUR AND PEASE LLP

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Attorneys for Cox Ohio Telcom, LLC

Attachment A

Central Office Code (NXX) Assignment Request Part 1 December 9, 2005

Tracking Number: 440-BRECKSVL-OH-787005

Full NXX: Pool
Replenishment

Type of Application: ☒ New ☐ Change ¹ ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: COX OHIO TELCOM, L.L.C.

Headquarters Address: 1400 Lake Hearn Dr

City, State, Zip: Atlanta, GA, 30342

Contact Name: Sandra Jones

Contact Address: 1400 Lake Hearn Dr

City, State, Zip: Atlanta, GA, 30342

Phone: 404-269-7722

FAX: 404-269-1270

E-mail: NOC.TN@cox.com

Code Administrator: ²

Name: Michael Ortega

Address: 46000 Center Oak Plaza

City, State, Zip: Sterling, VA, 20166

Phone: 571-434-5348

FAX: 571-434-5502

1.2 NPA: 440 NXX: ³ LATA: 320 OCN: ⁴ 385D Parent

Company's OCN(s) 7987

Switching Identification(Switch Entity/POI) ⁵ PARMOHGGGT0

Locality/City/Wire Center:

Rate Center: ⁶ BRECKSVL

Homing Tandem Operating Co: ⁷ AMERITECH Tandem Homing CLLI ⁸ :CLEVOH620GT
OHIO

1.3 Dates: Date of Application: 12/01/2014 Request Effective Date: ⁹ 02/05/2015
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.

Request Expedited Treatment? Yes ☐ No ☒ X

- 1.4 a) Type of company/entity requesting the code: CAP OR CLEC (LEC, IC, CMRS, Other)
b) Types of service: Wireline (e.g., Cellular - Type 2)
c) Code Assignment Preference (Optional) 440-xxx-2
d) Codes that are undesirable, if any

e) Type of change (Mark all that apply)

☐ OCN-Intra-company ¹¹ ☐ Switching Id. ☐ Rate Center ☐ Tandem Home CLLI
☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA ☐ Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an Initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

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 BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

We are serving as our own AOCN, and will waive [1-7] days to update BIRRDS"

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 Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/coc/inc/incdocs.htm>) as of the date of this application: ¹⁴

Sandra Jones

Signature of Code Applicant

Numbering
Solutions Spec 12/01/20
IV 14
Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of

Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ An incomplete form may result in delays in processing this request.

Attachment B

Thousands-Block Application Form - Part 1A

Tracking Number: 440-
BRECKSVL-
OH-787005
Full NXX: Pool
Replenishment

Type of Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: COX OHIO TELCOM, L.L.C.
Headquarters Address: 1400 Lake Hearn Dr
City, State, Zip: Atlanta, GA, 30342
Contact Name: Sandra Jones
Contact Address: 1400 Lake Hearn Dr
City, State, Zip: Atlanta, GA, 30342
Phone: 404-269-7722 FAX: 404- E-mail: NOG.TN@cox.com
269-1270

Pooling Administrator:

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 ☒ LRN needed ☐

NPA: 440 LATA: 320 OCN: 385D Parent Company's OCN 7987

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) :

PARMOHGGGT0

City or Wire Center Name : _____

Rate Center:
BRECKSVL

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 12/01/2014

Requested Block Effective Date: ^{viii} 02/05/2015

☒ 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) 440-xxx-
2
- 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) N/A

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 ^x ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company ^x ☐ 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: We are serving as our own AOCN, and will waive [1-7] days to update BIRDS"

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.

Sandra Jones

Signature of Block Applicant

Numbering
Solutions 12/01/2014
Spec IV

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based provider^x. 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, interexchange 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 must 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 shall 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.

Foot Notes :

^x Identify the type of change(s) in Section 1.5.

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

^z A CO Code application will also need to be submitted to the PA.

^{aa} 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 CLLITM code of the switch /POL.

^{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 network prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

[illegible]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 92.0

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

45

Months To Exhaust

0.489

I.
Utilization⁶
=

Assigned Numbers(B) - Excluded
Numbers(D)

X 100 = 70.1

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

¹A 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.

²Quantity 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).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #8 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

TN ADMINISTRATION

TN Utilization Summary as of 2014-11-26

OCN: 385D

COC	INP	Special Use	Ratepayer	NPA	XXX	X	Internal Office	Test	Other	Administrative	Assigned	Residential	Business	Aging	Reserved	Unavailable	Available	Shall
EOC	Y		BEREA	440	625	6	0	3	0	3	153	8	0	8	1	165	835	609
EOC	Y		BRECKSVL	440	627	6	0	2	0	2	701	30	7	37	215	955	45	609
EOC	Y		CLEVELAND	216	712	4	2	19	0	21	877	91	7	98	2	998	2	609
EOC	Y		CLEVELAND	216	712	6	0	47	1	48	863	53	4	57	27	995	5	609
EOC	Y		CLEVELAND	216	712	7	0	59	0	59	851	59	11	70	14	994	6	609
EOC	Y		CLEVELAND	216	767	5	0	30	0	30	752	67	11	78	1	861	139	609
EOC	Y		CLEVELAND	216	801	4	0	0	0	0	248	9	0	9	0	257	743	609
EOC	Y		CLEVELAND	440	799	4	1	11	0	12	910	46	16	62	15	999	1	609
EOC	Y		CLEVELAND	440	799	8	0	2	0	2	725	57	3	60	23	810	190	609
EOC	Y		INDEPENDENCE	216	236	6	0	3	0	3	536	21	3	24	3	566	434	609
EOC	Y		NOROVINGTON	440	457	2	0	3	0	3	363	26	0	26	1	393	607	609
EOC	Y		OLMSTEDTFLS	440	427	5	0	0	0	0	223	20	0	20	8	251	749	609
EOC	Y		OLMSTEDTFLS	440	793	6	0	7	0	7	811	57	2	59	1	878	122	609
EOC	Y		TRINITY	440	827	6	0	52	0	52	227	10	24	34	2	315	685	609
EOC	Y		VICTORY	440	340	4	0	1	0	1	89	10	4	14	0	104	896	609
EOC	Y		VICTORY	440	345	5	0	99	0	99	721	48	21	69	5	894	106	609
EOC	Y		VICTORY	440	481	3	0	2	0	2	882	101	6	107	7	998	2	609
EOC	Y		VICTORY	440	882	3	0	11	0	11	865	81	26	107	13	996	4	609
EOC	Y		VICTORY	440	882	6	0	26	0	26	888	74	4	78	6	998	2	609

Attachment D

Sandra Jones

From: NOC TN Admin <NOC.TN@cox.com>
Sent: Monday, December 01, 2014 2:28 PM
To: urntrdy@comcast.net
Subject: FW: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 440-BRECKSVL-OH-787005

From: agnes.rom@neustar.biz [mailto:agnes.rom@neustar.biz]
Sent: Monday, December 01, 2014 2:18 PM
To: NOC TN Admin
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 440-BRECKSVL-OH-787005

Pooling Administration System

Dated 01-December-2014

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 440-BRECKSVL-
OH-787005

Date of Application: 12/01/2014 **Effective Date:** _____
Date of Receipt: 12/01/2014 **Date of Response:** 12/01/2014

Service Provider Name: COX OHIO TELCOM, L.L.C.
(Telcordia TM LERG TM Routing Guide) OCN: 385D
Parent Company OCN: 7987

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): ¹

Rate Center: _____

Rate Center Sub Zone: _____

PARMOHGGGT0

BRECKSVL

☒ **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.)

neustar

Attachment E



December 4, 2014

Jerry Jannazo
Cox Business
12221 Plaza Dr.
Parma, OH 44130

Dear Mr. Jannazo,

Please reserve 140 new DID numbers for HMT Associates, Inc., 335 Treeworth Blvd., Broadview Hts., OH 44147. Please reserve and secure 140 DID numbers that do not conflict with the last four digits of existing DID numbers which range from 4430 through 5295, and 6370 through 6930. This will allow for seamless integration of new and existing numbers.

Sincerely,

A handwritten signature in dark ink that reads "Jenny Williams". The signature is fluid and cursive, with the first name "Jenny" and last name "Williams" clearly distinguishable.

Jenny Williams
Controller

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/10/2014 4:23:41 PM

in

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

Summary: Motion Motion for Review of a Decision of The North American Numbering Pooling Administrator electronically filed by Mr. Stephen M Howard on behalf of Cox Ohio Telcom, LLC