



221 E. Fourth St.  
P.O. Box 2301  
Cincinnati, Ohio 45201-2301

December 18, 2014

Ms. Barcy McNeal  
Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, Ohio 43215

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests and Other Number Resource Related Filings, PUCO Case No. 10-0884-TP-UNC

Dear Ms. McNeal:

Accompanying this letter is a Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachment are being filed electronically and are contained entirely within this PDF document. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-6671.

Sincerely,

A handwritten signature in blue ink that reads "Patricia L. Rupich".

Patricia L. Rupich

cc: Melissa Scarberry (via e-mail)  
Dan Fullin (via e-mail)

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**PETITION OF CINCINNATI BELL TELEPHONE COMPANY LLC  
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

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Cincinnati Bell Telephone Company LLC (“CBT”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBT request for numbering resources. On December 17, 2014, CBT filed a request with the PA for an NXX in the Cincinnati rate center to establish a Location Routing Number (“LRN”) for a new switch that it is deploying. CBT’s request was denied on the grounds that CBT has not satisfied the utilization level and months-to-exhaust (“MTE”) criteria established by the Federal Communications Commission and outlined in the Central Office Code Assignment Guidelines (“COCAG”).<sup>1</sup> Under the federal numbering rules, a state commission may overturn the PA’s decision based on its determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.<sup>2</sup> For the reasons set forth below, CBT submits that the Commission is justified in overturning the PA’s decision and granting CBT’s request for a new NXX to establish an LRN for its new switch.

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<sup>1</sup> 47 CFR § 52.15(g)(3)(iii); 47 CFR § 52.15(h); *Central Office Code (NXX) Assignment Guidelines (COCAG)*, ATIS-0300051, Alliance for Telecommunications Industry Solutions (October 24, 2014), Section 4.3.1.

<sup>2</sup> 47 CFR § 52.15(g)(4). Also, see *COCAG*, Section 4.1.3.

The new switch will provide CBT the ability to offer innovative new services not possible with its existing circuit switches. Moreover, it will enable CBT to relieve overcrowding on existing switches and allow CBT to operate its network more efficiently. However, before CBT can begin using this new switch, it must have an LRN assigned to the switch. In order to accommodate number portability and number pooling a unique LRN must be assigned for each switch within a LATA.<sup>3</sup>

Due to the specific requirements for LRN assignment,<sup>4</sup> none of CBT's existing numbers can be used as an LRN. Upon receipt of the new NXX, CBT will keep the "0" thousand-block and return the remaining blocks to the number pool. CBT will be able to port numbers from its existing numbering resources to the new switch once an LRN is assigned for the switch, so it does not anticipate the need for additional numbering resources for this switch beyond this initial request.

When CBT filed an application with the PA for an NXX to establish an LRN for this switch, the application was denied because CBT does not satisfy the utilization and MTE criteria for receipt of growth numbering resources. To further assist the Commission's review, a copy of CBT's application submitted to the PA via the automated Pooling Administration System ("PAS") is attached. This documentation includes the Part 1A application, the Months to Exhaust and Utilization Certification Worksheet, and the Pooling Administration System response denying the request because the Utilization Threshold has not been met.

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<sup>3</sup> A Location Routing Number is the ten-digit (NPA-NXX-XXXX) number assigned to a switch and is used for routing in a local number portability environment. An LRN is required for each LATA served by the switch.

<sup>4</sup> See, *Location Routing Number (LRN) Assignment Practices*, ATIS-0300065, Alliance for Telecommunications Industry Solutions, (September 5, 2014).

For the reasons set forth above, CBT requests that the Commission overturn the PA's decision and direct the PA to grant CBT's request for a new NXX in the Cincinnati rate center to establish an LRN so that CBT can proceed with deployment of its new switch.

Respectfully submitted,

/s/ Douglas E. Hart

Douglas E. Hart (0005600)  
441 Vine Street, Suite 4192  
Cincinnati, Ohio 45202  
(513) 621-6709  
(513) 621-6981 fax  
[dhart@douglasshart.com](mailto:dhart@douglasshart.com)

Attorney for Cincinnati Bell Extended  
Territories LLC

December 18, 2014

# **ATTACHMENT A**

Pooling Administration System		
denise.cozad@cinbell.com (SP)		
Time: 12/17/2014 03:44 27 PM EST		• Sign Out
<div> <div>Individual Block Requests</div> <div>CO/NXX Code Requests</div> <div>New Code Request</div> <div>Code Modification</div> <div>Code Disconnect</div> <div>Copy Code Request</div> <div>Withdraw Pending Requests</div> <div>Confirm Resources In Service</div> <div>Donate Blocks</div> <div>Submit Forecast</div> <div>Search Forms</div> <div>Reports</div> <div>User Profile</div> </div>	<div> <div>Type of Application: New Code</div> <div>Part1/1A</div> <div>View Pool Replenishment Status</div> </div> <div>1.1 Contact Information :</div> <div> <div>Code/Block Applicant:</div> <div> <div>Company/Entity Name</div> <div>CINCINNATI BELL, INC.</div> </div> <div> <div>Headquarters Address</div> <div>201 E 4th Street</div> <div>City Cincinnati</div> <div>State OH</div> <div>Zip 45202</div> </div> <div> <div>Contact Name</div> <div>Denise S Cozad</div> <div>Contact Address</div> <div>209 E4th Street, 121-1075</div> <div>City Cincinnati</div> <div>State OH</div> <div>Zip 45202</div> <div>Contact Phone 513-566-4130</div> <div>Contact Fax 513-651-9089</div> <div>Email denise.cozad@cinbell.com</div> </div> <div> <div>Pooling Administrator<sup>1</sup>:</div> <div> <div>Name Agnes Rom</div> <div>Address 1800 Sutter St</div> <div>City Concord</div> <div>State CA</div> <div>Zip 94520</div> <div>Telephone 925-363-7650</div> <div>Fax 925-363-7681</div> <div>Email agnes.rom@neustar.biz</div> </div> </div> <div> <div>Code Administrator<sup>2</sup>:</div> <div> <div>Name Michael Ortega</div> <div>Address 46000 Center Oak Plaza</div> <div>City Sterling</div> <div>State VA</div> <div>Zip 20166</div> <div>Phone 571-434-5348</div> <div>Fax 571-434-5502</div> </div> </div> </div> <div>1.2 General Information</div> <div> <div>LRN Needed<sup>3</sup> YES</div> <div> <div>NPA 513</div> <div>NXX<sup>3</sup></div> <div>LATA<sup>3</sup> 922</div> </div> <div> <div>OCN<sup>4</sup> 9348-CINCINNATI BELL, INC.</div> <div>Parent Company OCN<sup>4</sup> 9348</div> </div> <div> <div>Number of Thousands-Blocks Requested 1</div> <div>Locality/City/Wire Center</div> </div> <div> <div>Switch Identification (Switching) EVDOHEVPS2</div> <div>Identity/POI Code<sup>5</sup></div> </div> <div> <div>Rate Center<sup>6</sup> CINCINNATI</div> <div>Rate Center Sub Zone</div> </div> <div> <div>Homing Tandem Operating Company<sup>7</sup> CINCINNATI BELL INC</div> <div>Homing Tandem CLLI<sup>8</sup> CNCNOHWS03T</div> </div> </div>	

### 1.3 Dates

Date of Application<sup>vii</sup> 12/17/2014  
 Requested Effective date 02/21/2015 MM/DD/YYYY  
 Code<sup>viii 9 10</sup>

☒ 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.

Requested Expedited Treatment ☐ Yes ☒ No Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation

### 1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Company\* Incumbent Local Exchange Carrier (ILEC)  
 b) Type of Service\* Wireline  
 c) Code Assignment Preference (Optional)

NOTE: For a list of available codes go to the NANPA website at [www.nanpa.com](http://www.nanpa.com), click on Reports then Central Office Codes.

d) Codes that are undesirable, 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 ☒ Growth  
 Pooling Indicator<sup>13</sup> ☐ Yes ☒ No

### 1.6 NPA Jeopardy Criteria

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.

Remarks

Submit <sup>14</sup>

Cancel

Part1A Foot Notes

Part1 Foot Notes

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 the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.<sup>14</sup>

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.

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Question? Email us

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denise.cozad@cinbell.com (SP)

## Pooling Administration System

Time 12/17/2014 03:48:41 PM EST

Sign Out

- ☐ Individual Block Requests
- ☐ CO/NXX Code Requests
- ☐ New Code Request
- ☐ Code Modification
- ☐ Code Disconnect
- ☐ Copy Code Request
- ☐ Withdraw Pending Requests
- ☐ Confirm Resources In Service
- ☐ Donate Blocks
- ☐ Submit Forecast
- ☐ Search Forms
- ☐ Reports
- ☐ User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>

Date Wednesday, December 17, 2014

OCN 9343

Company Name CINCINNATI BELL, INC.

Rate Center CINCINNATI

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

513-206-1 513-215 513-221-0,1,2,3,4,5,6,7,8 513-230 513-231 513-232 513-233-0,2,3,4,5,6,9 513-241  
 513-242 513-243 513-244 513-245-0,1,2,3,4,5,6,7,9 513-246 513-247 513-251 513-263-1,2,3,4,5,6,7,8,9  
 513-271 513-272 513-277-2,3,4,5,6,7,8 513-281 513-287-1,2,3,4,5,6,7,8 513-303 513-321 513-326  
 513-333 513-345-1,2,3,4,5,6,7,8,9 513-346-1,2,3,4,5,6,7 513-347 513-351 513-352 513-353-  
 0,1,2,3,4,5,9  
 513-357 513-358 513-361 513-362-1,2,3,4,5,6,7,8 513-363 513-366 513-369 513-373-3 513-381 513-385  
 513-386-1,2,3 513-387-0,1,2,3,4,5,6,7,8 513-388-0,2,3,4,5,9 513-389-0,1,2,3,4,5,7,9 513-395 513-396  
 513-397 513-412 513-418-0,2,4,5,6,9 513-419-0,1,2,3,4,5,6,7,8 513-421 513-451  
 513-455-1,2,3,4,5,6,7,8,9 513-458-0,1,2,3,4,5,6,7,8 513-467-0,1,2,3,4,5,6,7,9 513-469 513-471  
 513-474 513-475-0,1,2,4,5,6,7,8,9 513-481 513-482-2,3,4,5,6,7,8 513-483 513-487-1,2,3,4,5,6,7

Code/Block Applicant: Denise S Cozad

Title: Technical Clerk 3

Phone: 513-566-4130

Fax: 513-651-9089

E-Mail: denise.cozad@cinbell.com

A. Available Numbers \* 612313

B. Assigned Numbers \* 1149855

C. Total Numbering Resources \* 1762168

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)

E. Growth History Previous 6-months<sup>3</sup>:

Month 1	-1775	Month 2	-1027
Month 3	-573	Month 4	-2389
Month 5	-1196	Month 6	-745

F. Forecast Next 12 months<sup>4</sup>:

Month 1	-1118	Month 2	-1118
Month 3	-1118	Month 4	-1118
Month 5	-1118	Month 6	-1118
Month 7	-1118	Month 8	-1118
Month 9	-1118	Month 10	-1118
Month 11	-1118	Month 12	-1118

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) -1118.0

H. Months to Exhaust<sup>5</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested

A. Available Numbers

H. Months to Exhaust

1

612313

-547.686

I. Utilization<sup>6</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100  
Explanation


65.252

- <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, § 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)).

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Question? Errors  
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# Pooling Administration System


 denise.cozad@cinbell.com (SP)


• Sign Out


Time : 12/17/2014 03:49:33 PM EST


 Individual Block Requests


 CO/NXX Code Requests


 New Code Request


 Code Modification


 Code Disconnect


 Copy Code Request


 Withdraw Pending Requests


 Confirm Resources In Service

 Donate Blocks

 Submit Forecast

 Search Forms

 Reports

 User Profile

## Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup>

Your Utilization calculates to 65.252%. The FCC required the utilization of 75.000%.

Select One Option and Submit

☐ Return to the Months To Exhaust Form

☒ Need to request a State Waiver

☐ Received a State Waiver

Submit

Cancel

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Question? Email us

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## Pooling Administration System



denise.cozad@cinbell.com (SP)

• Sign Out

Time : 12/17/2014 03:50:59 PM EST

- + Individual Block Requests
- CO/NXX Code Requests
  - New Code Request
  - Code Modification
  - Code Disconnect
  - Copy Code Request
- + Withdraw Pending Requests
- + Confirm Resources In Service
- + Donate Blocks
- + Submit Forecast
- + Search Forms
- + Reports
- + User Profile

Your request has been successfully submitted.  
The Tracking Number for this request is: **513-CINCINNATI-OH-791813**

[Return to Inbox](#)[View Forms](#)

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**PAS - Pooling Administrator's Response/Confirmation for Tracking  
Number: 513-CINCINNATI-OH-791813**

agnes.rom@neustar.biz

Sent: Wednesday, December 17, 2014 3:51 PM

To: Setser, Cathy; Cozad, Denise

Cc: PA\_Part3@neustar.biz

**Pooling Administration System**

Dated 17-December-2014

November 21, 2003

ATIS-0300066.at3

Attachment 3

**Pooling Administrator's Response/Confirmation  
TBPAG Part 3**

**Tracking Number :** 513-  
CINCINNATI-OH-  
791813

Date of Application:	12/17/2014	Effective Date:	
Date of Receipt:	12/17/2014	Date of Response:	12/17/2014

Service Provider Name: CINCINNATI BELL, INC.

(Telcordia <sup>TM</sup> LERG  
<sup>TM</sup> Routing Guide ) 9348

OCN:

Parent Company OCN: 9348

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> EVDLOHEVPS2  
Rate Center: CINCINNATI  
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.**

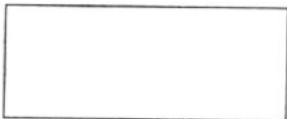
Explanation:

**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.)



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

**Commission of Ohio Docketing Information System on**

**12/17/2014 7:01:56 PM**

**in**

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

Summary: Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Telephone Company LLC