

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC FOR REVIEW OF A
DECISION OF NEUSTAR - POOLING ADMINISTRATOR

Teleport Communications America, LLC ("Teleport"), 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 Teleport's request for numbering resources, as more fully described herein.

An Ohio customer, University Hospitals, has requested 3000 numbers in the Elyria rate center. University Hospitals is acquiring Elyria Medical Center and is integrating this facility and the affiliated buildings and practices into the University Hospitals' enterprise system. In order to maintain the integrity of their existing internal dialing plan, University Hospitals is requesting that the NXX NOT be of the format NX0, NX1 or NX9. This request is reflected in the customer letter. Teleport has developed a communications plan that University Hospitals will implement, and will subsequently assign the 3000 numbers within 180 days of the numbers being made available to the enterprise.

The Elyria rate center, in the 440 area code, began number pooling in April 2002 and therefore number acquisition by a Number Pooling carrier is gained through an interface with the PA.¹ On May 8, 2015, Teleport submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and Utilization”) to the PA² using the Pooling Administration System (“PAS”). Teleport requested 3 number blocks in the Elyria rate center and subsequently received an error message indicating the request would not process via the system without a state waiver.³ The PA, applying FCC rules and INC Guidelines, requires a block holder requesting growth resources to demonstrate

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

² A copy of the Part1A and MTE worksheet are attached as Exhibit B.

³ A copy of the error message is appended as the last page of Exhibit B.

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 Teleport 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 3000 numbers in the format 330-NX2 – 8. Teleport has only the 440-406-8 block. Therefore, Teleport needs to obtain the number blocks in order to satisfy the customer's request. The Elyria number pool has only 1 block in inventory and so Teleport must request that a new code be opened. University Hospitals will activate 3000 numbers and the remaining 7 blocks will replenish the pool.

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." Teleport 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 Teleport's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of University Hospital's letter of intent.

For the reasons set forth herein, Teleport respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Elyria rate center to Teleport for use by University Hospitals.

Respectfully submitted,

Teleport Communications America, LLC

By: /s/ Jon F. Kelly

Jon F. Kelly
AT&T Services, Inc.
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Its Attorney



May 4, 2015

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AT&T TNAC,

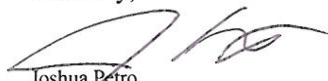
This letter of Intent represents a request by University Hospitals for 3000 TN's for SIP service. University Hospitals intends to order service in the Elyria, Ohio rate center, pending AT&T's successful completion of the required testing. University Hospitals intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

University Hospitals is expanding to multiple locations in the geographic area covered by area code 440, and continues to grow. University Hospitals has acquired Elyria Medical Center and its affiliated buildings and practices, and within the next 1 to 2 years will need integrate their phone systems into the enterprise system. In the past year, in addition to the medical center, we have added numerous physician practices in the same geographic area, and in the next 1 to 3 years we expect to affiliate with additional practices in the same geographic area that will also need to be integrated into the enterprise phone system. In order to provide to provide administrative, physician offices, research, administrative, lab space and other system services with phone we require a consecutive block of 3000 TN's.

To meet the needs of our dial plan we need a block of TN's where the prefix does not start with a 0, 1 or 9, i.e., 330-NxX-xxxx, where X cannot be 0, 1 or 9). The numbers will be installed as TN's on SIP trunking located at 11100 Euclid Ave., Cleveland, OH 44106, within 180 days from AT&T's receipt of numbers. We expect that this block will meet our requirements for at least the next three 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,



Joshua Petro
Architect, Unified Communications
Information Technology

Central Office Code (NXX) Assignment Request
Part 1 July 19, 2010

Tracking
Number: 440-ELYRIA-OH-830327

Full NXX: Pool
Replenishment

Type of
Application: ☒ New ☐ Change ☐ Delete
1

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH

Headquarters
Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07921

Contact Name: Lisa Loper

Contact
Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07921

Phone: 908-234-7622 Fax: 908-234-8044
E-mail: lloper@att.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 7532
Parent Company's OCN(s) 7125

Switching Identification (Switching Entity/POI) ⁵
CLEVOH02RMD

Locality/City/Wire Center:

Rate Center: ⁶
ELYRIA

Homing Tandem Operating Co.: ⁷
ATT

Tandem Homing
CLLITM ⁸

CLEVOH620GT1.3 Dates: Date of
Application: 05/08/2015Requested Effective Date: ^{9 10}
07/13/2015

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

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) The NXX can not end
in a 0, 1, 9 440-xxx-4, 440-xxx-5, 440-xxx-6d) Codes that are undesirable, if any The NXX can not end in a 0,
1, 9e) Type of change (Mark all that apply)☐ OCN-Intra-company ¹¹ ☐ Switching Id ☐ Rate Center ☐
Tandem Homing CLLI☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservation1.5 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 ☐ No1.6 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: _____

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/inc/incguides.asp>) as of the date of this application.¹⁴

Lisa Loper

Manager-Code Administration

05/08/2015

Signature of Code Applicant

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 iconectiv 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 iconectiv

COMMON LANGUAGE CLLI TM 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. dba iconectiv)

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 CLLI TM 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.

TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking
Number: 440-ELYRIA-
OH-830327
Full NXX: Pool
Replenishment

Type of
Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH

Headquarters
Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07921

Contact Name: Lisa Loper

Contact
Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07921

Phone: 908-234-7622 Fax: 908-234-8044 E-mail: lloper@att.com

Pooling Administrator: ⁱⁱ

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:

Part1A

https://www.nationalpooling.com/pas/print_form.jspCheck one : No LRN needed X LRN needed ⁱⁱⁱ NPA: 440 LATA: 320 OCN: ^{iv} 7532 Parent Company's
OCN 7125 Number of Thousands-Blocks Requested : 3 Switch Identification (Switching Entity/POI) : ^v
 CLEVOH02RMD Rate Center: ^{vi} ELYRIA

1.3 Dates:

Date of Application: ^{vii} 05/08/2015 Requested Block Effective
Date: ^{viii} 07/13/2015

☐ 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)
 The NXX can not end in a 0, 1, 9 440-xxx-4, 440-xxx-5, 440-xxx-6
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
 The NXX can not end in a 0, 1, 9
- 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^{ix} ☐ 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 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

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

Remarks:

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.

Lisa Loper

Signature of Block Applicant

Manager-Code Administration 05/08/2015

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 iconectivTM 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 iconectiv Telecom 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^{xi}. 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. The 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.

Footnotes:

ⁱ Identify the type of 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 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 PSTN 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} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 440-ELYRIA-OH-830327Date: Friday, May 8, 2015 OCN: 7532 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OHRate Center: ELYRIAList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: NPA NXX BLOCK ID 440 406 5Name of Block Applicant: Lisa LoperSignature: Lisa LoperTitle: Manager-Code Administration
FAX No.: 908-234-8044Telephone No.: 908-234-7622-E-Mail: lloper@att.comA. Available Numbers: 928B. Assigned Numbers: 68C. Total Numbering Resources: 1000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation³: 0List
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
--	----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth

History -

Previous 6

months⁴

-3	0	-2	0	21	3
----	---	----	---	----	---

F. Forecast

- Next 12

months⁵

3011	5	5	5	2	3	4	4	5	5	6	4
------	---	---	---	---	---	---	---	---	---	---	---

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 505.167

H. Months

to Exhaust⁶

Numbers Available for Assignment to
Customers(A)

=

Average Monthly Forecast(G)

Block RequestedAvailable NumbersMonths To Exhaust

1

928

1.837

2

1928

3.817

3

2928

5.796

I.

Utilization⁷Assigned Numbers(B)X 100 = 6.8

=

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

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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : **440-ELYRIA-
OH-830327**

Date of Application: **05/08/2015** Effective Date: _____

Date of Receipt: **05/08/2015** Date of Response: **05/08/2015**

Service Provider Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**

(iconectivTM LERGTM Routing Guide) OCN: **7532**

Parent Company OCN: **7125**

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

CLEVOH02RMD

Rate Center:

ELYRIA

☒ 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/14/2015 8:29:02 AM

in

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

Summary: Petition for review of a decision of NeuStar - Pooling Administrator electronically filed by Maryann Mackey on behalf of Teleport Communications America, LLC