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 Ravenna rate center. University Hospitals is acquiring Robinson Memorial Hospital 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 Ravenna rate center, in the 330 area code, began number pooling in January 2003 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 Ravenna 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 330-235-7 block. Therefore, Teleport needs to obtain the number blocks in order to satisfy the customer's request. The Ravenna number pool does not have any inventory so Teleport must request that a new code be opened. University Hospitals will activate 3000 numbers and the remaining 7 blocks will be put into 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 Ravenna rate center to Teleport for use by University Hospitals.

Respectfully submitted,

Teleport Communications America, LLC

By: <u>/s/ Jon F. Kelly</u>

Jon F. Kelly AT&T Services, Inc. 150 E. Gay St., Rm. 4-A Columbus, Ohio 43215

(614) 223-7928

Its Attorney



May 4, 2015

Mary Brown AT&T Client Account Manager 250 S Clinton St Syracuse, NY 13202 Joshua Petro Unified Communications Architect

Information Technology University Hospitals Case Medical Center 11100 Euclid Avenue, UCRCII, MS BIS5095 Cleveland, Ohio 44106 216.286.2230 Phone

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 Ravenna, 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 330, and continues to grow. University Hospitals is in the process of finalizing the acquisition of Robinson Memorial Hospital 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 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., $330\text{-Nx}\underline{X}\text{-xxxx}$, where \underline{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,

Jesnua Petro

Architect, Unified Commuications

Information Technology

https://www.nationalpooling.com/pas/print_form.jsp

Code Part1A

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

Tracking

330-RAVENNA-OH-830328

Number:

Full NXX: Pool Replenishment

Type of

8 New

□ Change □ Delete

Application:

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity TELEPORT COMMUNICATIONS AMERICA, LLC - OH

Name:

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

E-mail: <u>lloper@att.com</u>

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

Fax: <u>908-234-8044</u>

NXX: 3 1.2 NPA: 330

LATA: 325

OCN: 4 7532

Parent Company's OCN(s) 7125

Switching Identification (Switching Entity/POI) 5

AKRNOH25XWY

Locality/City/Wire Center:

Rate Center: 6

RAVENNA

Homing Tandem Operating Co.: 7

Tandem Homing

CLLI^{TM 8}

ATT

Code Part1A

:AKRNOH255GT

		Date of 05/08/2015	Requested Effective —	e Date: ^{9 10} 07/13/2015
possibl applies	e effector to a r	ctive date the Admir		
			(es NoX l if "Request Expedite"	
		ype of company/ent MRS, Other)	ity requesting the code:	CAP OR CLEC
	b) Ty	pes of service:	/ireline (e.g., Cellu	lar - Type 2)
			erence (Optional) 30-xxx-5, 330-xxx-6	The NXX can not end
		des that are undesira	able, if anyThe	NXX can not end in a 0.
	e) Ty	pe of change (Mark	all that apply)	
		OCN-Intra-compar	ny ¹¹ F Switching Id E	Rate Center
		OCN-Inter-compar servation	ny ¹² Effective Date	r LATA Extend
1.5 T	уре о	f Request (Initial, gr	owth, etc.)Growth	_
	ode ir		nce of certification and ays. If a growth code, a	(2) proof of ability to attach months to exhaust
Po	oling	Indicator: 13 [7] Yes	s ^{t, s} No	
1.6 N	VPA Je	opardy Criteria App	oly: 🗆 Yes 🗅 No	

Code Part1A https://www.nationalpooling.com/pas/print_form.jsp

1.7	Code request for new service (Explain):
_	
cut-	It is the code applicant's responsibility to arrange input of Part 2 rmation into BIRRDS. The 45-calendar day nationwide minimum interval over for BIRRDS will not begin until input into BIRRDS has been pleted.
Cor	nments:
	······································

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 LoperManager-Code Administration05/08/2015Signature of Code ApplicantTitleDate

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 <u>not</u> 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 330-RAVENNA-OH-830328 Number:

> Full NXX: Pool Replenishment

Type of □ New

Change i Disconnect Application:

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH

Headquarters

One AT&T Way

Address:

City, State, Zip: Bedminster, NJ, 07921

Contact Name: Lisa Loper

Contact

One AT&T Way

Address:

City, State, Zip: Bedminster, NJ, 07921

Phone:

E-mail: <u>lloper@att.com</u> Fax: 908-234-8044

908-234-7622

Pooling Administrator: ii

Contact Name: Agnes Rom

Contact

1800 Sutter St

Address:

City, State, Zip: Concord, CA, 94520

Fax: <u>925-363-7681</u> Phone: 925-363-7650

E-mail: agnes.rom@neustar.biz

1.2 General Information:

https://www.nationalpooling.com/pas/print_form.jsp

Check	one:No	LRN nee	eded <u>x</u> L	RN needed ⁱⁱ	i
NPA:	330	LATA:	325	OCN: ^{iv} 7532	Parent Company's OCN <u>7125</u>
Numb	er of Tho	ısands-B	locks Requeste	ed : <u>3</u>	
	h Identific (R <u>NOH25X</u>		witching Entity	/POI) : ^v	
Rate (Center: ^{vi} _	RAVE	<u>INNA</u>		
1.3 D	ates:				
				-	Hock Effective
Date of	of Applica	tion: VII _	05/08/2015	Date: viii –	<u>07/13/2015</u>
applie will si	es to a redu till be prod est Expedi	essed in	the Administra the order reces	ator's processived. ction 8.6) Yes	Please note that this only ing time, however the request seem. NoX and s-Block:
a) 7	Гуре of Se	rvice Pro	ovider : CAP	OR CLEC	(LEC, IXC, CMRS, Other)
•	2 2	-	vice Blocks to		
) (NXX-X) ass a 0, 1, 9 330-xx		erence (Optional)
d) 7	Thousands	-Block(s		at are undesira	able for this assignment , if
	_	_			which block(s) you will be to the pool)N/A
-	ype of Rec		tar • Vac	ĭf V Δα Δ**	ach evidence of authorization
			o provide servi		ach evidence of authorization days.

https://www.nationalpooling.com/pas/print_form.jsp

Part1A

Growth block for rate center: Yes	X If Yes, attach months to e	exhaust
By selecting this checkbox, I ack block in red and explicitly understand the be activated in the PSTN and loaded in	hat the underlying CO code may	y not yet
Type of change (Mark all that apply)		
© OCN: Intra-company ix 11 S	witching Id 🗀 Part 1B	
□ OCN: Inter-company × □ E	ffective Date	
Change block: YesIf 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 av	ailable for assignment :	
c) Have all new Intra SP ports been of	ompleted in the NPAC: Yes	or No
d) Has this block been protected from	n further assignment: Yes	or No
Disconnect block: YesIf Yes	, list NPA-NXX-X	_
Remarks:		
I hereby certify that the above informate and accurate to the best of my knowled prepared in accordance with the Thousa Administration Guidelines ATIS-03000 (http://www.atis.org/inc) or by contactinapplication.	ge and that this application has ands-Block (NXX-X) Pooling 166 available on the ATIS web s	been ite
Lisa <u>Loper</u>	Manager-Code Administration	<u>05/08/2015</u>
Signature of Block Applicant	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 iconectiv 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 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 CLLI tandem of the facilities based provider in 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 /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 Select if you are the current Block Holder.
- X Select if you are <u>not</u> the current Block Holder
- xi LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

Appendix 3

MTE Block

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level $^{\mathrm{I}}$

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 330-RAVENNA-OH-830328

Date: Friday, May 8, OCN:7532 Company Name: TELEPORT COMMUNICATIONS

AMERICA, LLC - OH <u>2015</u>

Rate Center: RAVENNA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:330-235-7

Name of Block Applicant: Lisa

Signature: Lisa <u>Loper</u>

<u>Loper</u>

Telephone No.: 908-234-7622-Title: Manager-Code Administration

FAX No.: 908-234-8044

E-Mail: <u>lloper@att.com</u>

- A. Available Numbers: 901
- B. Assigned Numbers: 46
- C. Total Numbering Resources: 1000
- D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation $3:\underline{0}$

List

Excluded

Code(s) or

Block(s):

MTE Block

	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12
E. Growth History - Previous 6 months ⁴	<u>0</u>	Õ	<u>o</u>	<u>o</u>	<u>o</u>	<u>53</u>						
F. Forecast - Next 12 months ⁵	<u>3000</u>	<u>1</u>	<u>o</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>o</u>	<u>1</u>	<u>o</u>	<u>1</u>

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):500.5

H. Months to Exhaust⁶

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	901	1.80
2	1901	3.798
3	2901	5.796

I. Utilization⁷

Assigned Numbers(B)

X 100 =

4.6

=

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

https://www.nationalpooling.com/pas/print_form.jsp

MTE Block

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))

Part3

January 12, 2015

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number:	330-RAVENNA- OH-830328	_	
Date of Application:	05/08/2015	Effective Date:	Market facilities
Date of Receipt:	05/08/2015	Date of Response:	05/08/2015
Service Provider Name:	TELEPORT COM	MUNICATIONS AMI	ERICA, LLC - OH
(iconectiv TM LERG TM Routing Guide) OCN:	7532		
Parent Company OCN:	7125	man Asimir s A =	
NPAC SOA SPID :			
Pooling Administrator C	ontact Informatio	n:	
Agnes Rom	Pho	ne:	925-363-7650
Signature of Pooling Add			
Agnes Rom	Fax:		925-363-7681
Name (p r int)			
Email:	agne	es.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	i(Yes or No):		

Part3

https://www.nationalpooling.com/pas/print_form.jsp

If Yes, enter the number of TNs contaminated: Switch Identification(Switch Entity/POI): 1 AKRNOH25XWY Rate Center: **RAVENNA** 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:

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 8:30:27 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