

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

The Victory 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 June 11, 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 Victory 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 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 the utilization threshold was NOT 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 440-NX2 – 8. Teleport has only the 440-253-2 block with approximately 700 numbers available. Therefore, Teleport needs to obtain the number blocks in order to satisfy the customer’s request. The Victory number pool has 3 blocks available in the format 440-NX2-8.

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:

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.

(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 Victory rate center to Teleport for use by University Hospitals.

Respectfully submitted,

Teleport Communications America, LLC

By: /s/ Jon F. Kelly

Jon F. Kelly
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Its Attorney

10-884

Part1A

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

TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking
Number: **440-VICTORY-**
OH-850296
Individual Block
Request

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: ⁱⁱContact 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 _____ LRN needed ⁱⁱⁱ _____NPA: 440 LATA: 320 OCN: ^{iv} 7532 Parent Company's
OCN 7125Number of Thousands-Blocks Requested : 3Switch Identification (Switching Entity/POI) : ^v INDPOHDBDS0Rate Center: ^{vi} VICTORY

1.3 Dates:

Date of Application: ^{vii} 06/11/2015 Requested Block Effective
Date: ^{viii} 07/10/2015

☐ 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 X No _____

Expedited Explanation:

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) _____
440-502-2,3,4,5,6,7
- 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) _____

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 ☒ 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

Title

06/11/2015

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

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-VICTORY-OH-850296**Date: **Thursday, June 11, 2015** OCN: **7532** Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**Rate Center: **VICTORY**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **NPA NXX BLOCK ID 440 253 A 440 253 2**Name of Block Applicant: **Lisa Loper**Signature: **Lisa Loper**Title: **Manager-Code Administration**
FAX No.: **908-234-8044**Telephone No.: **908-234-7622-**E-Mail: **lloper@att.com**A. Available Numbers: **755**B. Assigned Numbers: **229**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: **0**List
Excluded
Code(s) or
Block(s):

MTE Block

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

	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

	<u>2</u>	<u>2</u>	<u>1</u>	<u>6</u>	<u>7</u>	<u>0</u>						
--	----------	----------	----------	----------	----------	----------	--	--	--	--	--	--

F. Forecast
- Next 12
months⁵

	<u>3000</u>	<u>-3</u>	<u>2</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
--	-------------	-----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 500.333

H. Months
to Exhaust⁶
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	755	1.509
2	1755	3.508
3	2755	5.506

I.
Utilization⁷
=

Assigned Numbers(B) X 100 = 22.9

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

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : **440-VICTORY-
OH-850296**

Date of Application: **06/11/2015** Effective Date: _____

Date of Receipt: **06/11/2015** Date of
Response: **06/11/2015**

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) : _____

Part3

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

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

INDPOHDBDS0

Rate Center:

VICTORY

☒ Form Complete, request denied.

Explanation:

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.

☐ 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)



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 Victory 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 Parma Medical Center, numerous physician practices and multiple affiliated buildings 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., 440-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,

A handwritten signature in black ink, appearing to read 'JPetro', written over a horizontal line.

Joshua Petro
Architect, Unified Communications
Information Technology

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/12/2015 11:28:02 AM

in

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

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