

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   | ) |                        |

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

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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 1000 numbers in the Sandusky rate center. University Hospitals is acquiring multiple physicians' practices and is integrating these locations 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 1000 numbers within 180 days of the numbers being made available to the enterprise.

The Sandusky rate center, in the 419 area code, began number pooling in February 2003 and therefore number acquisition by a Number Pooling carrier is gained through an interface

with the PA.<sup>1</sup> 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 PA<sup>2</sup> using the Pooling Administration System (“PAS”). Teleport requested 3 number blocks in the Sandusky rate center and subsequently received an error message indicating the request would not process via the system without a state waiver.<sup>3</sup> 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 1000 numbers in the format 419-NX2 – 8. Teleport has only the 567-998-7 block, in the Sandusky rate center, with approximately 700 numbers available. Therefore, Teleport needs to obtain the number blocks in order to satisfy the customer’s request. The Sandusky number pool has 29 blocks in the pool, 8 are contaminated and of the 21 remaining only 1 satisfies the requested format of 419-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:

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

<sup>2</sup> A copy of the Part1A and MTE worksheet are attached as Exhibit A.

<sup>3</sup> A copy of the error message is appended as the last page of Exhibit A.

(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 (Exhibit A), and a copy of University Hospital's letter of intent (Exhibit B).

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 Sandusky 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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614-223-7928  
jk2961@att.com

Its Attorney

10-884

## TBPAG Attachment 1 - January 12, 2015

## Thousands-Block Application Form - Part 1A

Tracking  
Number: **419-SANDUSKY-**  
**OH-850806**  
**Individual Block**  
**Request**

Type of  
Application: ☒ New ☐ Change <sup>i</sup> ☐ 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: <sup>ii</sup>

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.jsp](https://www.nationalpooling.com/pas/print_form.jsp)Check one : No LRN needed \_\_\_\_\_ LRN needed <sup>iii</sup> \_\_\_\_\_NPA: 419 LATA: 326 OCN: <sup>iv</sup> 7532 Parent Company's  
OCN 7125Number of Thousands-Blocks Requested : 1Switch Identification (Switching Entity/POI) : <sup>v</sup> TOLDOH21XYYRate Center: <sup>vi</sup> SANDUSKY

## 1.3 Dates:

Date of Application: <sup>vii</sup> 06/12/2015 Requested Block Effective  
Date: <sup>viii</sup> 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) \_\_\_\_\_  
567-283-6, 4, 3  
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 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 <sup>ix</sup> ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company <sup>x</sup> ☐ 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](mailto:inc@atis.org) as of the date of this application.

Lisa Loper

Signature of Block Applicant

Manager-Code Administration 06/12/2015

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 iconectiv<sup>TM</sup> LERG<sup>TM</sup> 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<sup>TM</sup> tandem of the facilities based provider<sup>xi</sup>. 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:

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> 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).

<sup>v</sup> 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 CLLI<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> 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 Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 419-SANDUSKY-OH-850806Date: Friday, June  
12, 2015OCN: 7532Company Name: TELEPORT COMMUNICATIONS  
AMERICA, LLC - OHRate Center: SANDUSKYList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: NPA NXX BLOCK ID 567 998 7Name 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: 778B. Assigned Numbers: 204C. 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 calculation<sup>3</sup>: 0List  
Excluded  
Code(s) or  
Block(s):

MTE Block

[https://www.nationalpooling.com/pas/print\\_form.jsp](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

months<sup>4</sup>

|   |   |   |   |    |    |
|---|---|---|---|----|----|
| 7 | 2 | 4 | 6 | -3 | 12 |
|---|---|---|---|----|----|

## F. Forecast

- Next 12

months<sup>5</sup>

|      |   |   |   |   |   |   |   |   |   |   |   |
|------|---|---|---|---|---|---|---|---|---|---|---|
| 1000 | 1 | 1 | 1 | 2 | 2 | 2 | 2 | 2 | 2 | 1 | 2 |
|------|---|---|---|---|---|---|---|---|---|---|---|

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 167.833

## H. Months

to Exhaust<sup>6</sup>

=

$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$
Block Requested

1

Available Numbers

778

Months To Exhaust

4.636

## I.

Utilization<sup>7</sup>

=

Assigned Numbers(B)

X 100 =

20.4

$$\frac{\text{Total Numbering Resources(C)-Excluded Numbers(D)}}{\text{Assigned Numbers(B)}}$$

Explanation: \_\_\_\_\_

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

<sup>3</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>4</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>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>6</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, section 52.15 (g) (3) (iii)).

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

January 12, 2015

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3Tracking Number : **419-SANDUSKY-  
OH-850806**Date of Application: **06/12/2015** Effective Date: \_\_\_\_\_Date of Receipt: **06/12/2015** Date of Response: **06/12/2015**Service Provider Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**(iconectiv<sup>TM</sup> LERG<sup>TM</sup> **7532**

Routing Guide ) OCN: \_\_\_\_\_

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](https://www.nationalpooling.com/pas/print_form.jsp)

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): <sup>1</sup>

Ratc Center:

TOLDOH21XYY

SANDUSKY

☒ 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:

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



**Jodi Molner**  
Operations Coordinator

June 5, 2015

Mary Brown  
AT&T  
Client Account Manager  
250 S Clinton St  
Syracuse, NY 13202

**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 1000 TN's for SIP service. University Hospitals intends to order service in the Sandusky, 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 419, and continues to grow. University Hospitals has acquired multiple physician practices and physical locations, and continues to add to that number, 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 1000 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., 419-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 'Jodi P. Molner', written over a horizontal line.

Jodi Molner  
Operations Coordinator  
Information Technology

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

**Commission of Ohio Docketing Information System on**

**6/15/2015 10:15:42 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