

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

The Chardon 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 August 20, 2015, Teleport submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and

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Utilization”) to the PA² using the Pooling Administration System (“PAS”). Teleport requested 3 number blocks in the Chardon 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 1000 numbers in the format 440-NX2 – 8. Teleport has only the 440-214-6 block with approximately 800 numbers available. Therefore, Teleport needs to obtain the number blocks in order to satisfy the customer’s request. The Chardon number pool has 2 blocks available but only 1 of the blocks conforms to the required 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:

(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.

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

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

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

Respectfully submitted,

Teleport Communications America, LLC

By: /s/ Douglas W. Trabaris
Douglas W. Trabaris
Teleport Communications America, LLC
225 West Randolph Street, Floor 25D
Chicago, IL 60606
312-727-4784
dt1329@att.com

Exhibit A

Part1A

TBPAAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking Number: **440-CHARDON-
OH-869492**
**Individual Block
Request**

Type of Application: ☒ New ☐ Change ⁱ ☐ 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:

Check one : No LRN needed _____ LRN needed ⁱⁱⁱ _____

Part1A

NPA: 440 LATA: 320 OCN: ^{iv} 7532 Parent Company's
OCN 7125
Number of Thousands-Blocks Requested : 1
Switch Identification (Switching Entity/POI) : ^v
CLEVOH02RMD
Rate Center: ^{vi} CHARDON

1.3 Dates:

Date of Application: ^{vii} 08/20/2015 Requested Block Effective
Date: ^{viii} 09/21/2015
-

☐ 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) ____
440-214-8
- 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

Part1A

☐ 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 08/20/2015

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™ 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^{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 /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 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-CHARDON-OH-869492Date: Thursday, August 20, 2015 OCN: 7532 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OHRate Center: CHARDONList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: NPA NXX BLOCK ID 440 214 6Name of Block Applicant: Lisa Loper Signature: Lisa LoperTitle: Manager-Code Administration
FAX No.: 908-234-8044Telephone No.: 908-234-7622-E-Mail: lloper@att.comA. Available Numbers: 873B. Assigned Numbers: 117C. 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 ³: 0List
Excluded
Code(s) or
Block(s):

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>-8</u>	<u>10</u>	<u>5</u>	<u>-5</u>	<u>0</u>	<u>0</u>						

F. Forecast - Next 12 months ⁵	<u>1018</u>	<u>9</u>	<u>10</u>	<u>12</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>4</u>	<u>6</u>	<u>6</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 176.0

H. Months to Exhaust⁶ =
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	873	4.96

I. Utilization⁷ =
$$\frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{11.7}$$

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 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-CHARDON-
OH-869492**

Date of Application: **08/20/2015** Effective Date: _____
Date of Receipt: **08/20/2015** Date of Response: **08/20/2015**

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

(iconectiv TM LERG TM 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 : _____

Part3

Switch Identification(Switch Entity/POI): ¹CLEVOH02RMD

Rate Center:

CHARDON☒ 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)

LOPER, LISA A

From: agnes.rom@neustar.biz
Sent: Thursday, August 20, 2015 2:32 PM
To: LOPER, LISA A
Cc: PA_Part3@neustar.biz
Subject: 440-CHARDON-OH-869492 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 20 August 2015

January 12, 2015

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 440-CHARDON-OH-869492

Date of Application: 08/20/2015 Effective Date: _____
Date of Receipt: 08/20/2015 Date of Response: 08/20/2015

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH
(iconectiv™ LERG™
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:

CHARDON

☒ Form Complete, request denied.Explanation: _____
_____☐ 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)

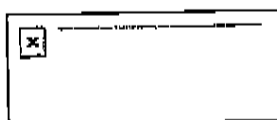


Exhibit B



August 12, 2015

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

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 Chardon 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 has existing operations throughout this rate center, and continues to expand in the geographic area covered by area code 440. As new services are established University 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 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., 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 cursive script, appearing to read 'Joshua L. Petro'.

Joshua Petro
Architect, Unified Communications
Information Technology

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

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in

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

Summary: Petition TCA Petition for Review electronically filed by Douglas W Trabaris on behalf of Teleport Communications America, LLC