



221 E. Fourth St.
P.O. Box 2301
Cincinnati, Ohio 45201-2301

September 9, 2015

Ms. Barcy McNeal
Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests and Other Number Resource Related Filings, PUCO Case No. 10-0884-TP-UNC

Dear Ms. McNeal:

Accompanying this letter is a Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachments are being filed electronically and are contained entirely within this PDF document. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-6671.

Sincerely,

A handwritten signature in blue ink that reads "Patricia L. Rupich".

Patricia L. Rupich

cc: Melissa Scarberry (via e-mail)
Dan Fullin (via e-mail)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Consideration of Telephone Safety Valve)	Case No. 10-0884-TP-UNC
Requests and Other Number Resource)	
Related Filings)	

**PETITION OF CINCINNATI BELL TELEPHONE COMPANY LLC
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

Cincinnati Bell Telephone Company LLC (“CBT”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBT request for numbering resources. On August 28, 2015, CBT filed a request with the PA seeking 3,000 contiguous numbers in the Cincinnati rate center to meet a specific customer request that CBT was unable to satisfy with its existing numbering resources. The PA denied CBT’s request on the grounds that CBT does not meet the months-to-exhaust and utilization criteria established by the Federal Communications Commission (“FCC”). Under the federal numbering rules, a state commission may overturn the PA’s decision based on its determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹ For the reasons set forth below, CBT submits that the Commission is justified in overturning the PA’s decision and granting CBT’s request for three thousands blocks to meet this customer’s needs.

In its Third Report and Order in the Numbering Resource Optimization proceeding, the FCC found that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific

¹ 47 CFR 52.15(g)(4).

customer request.”² It also clarified that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers.³ Therefore, this Commission has the authority to overturn the PA’s decisions under the appropriate circumstances.

Mercy Health’s Request

In the immediate case, CBT has a request from Mercy Health for 3,000 contiguous numbers in the Cincinnati rate center to be used for its new corporate headquarters facility that is scheduled to open in late 2015 in Cincinnati, Ohio. This new facility will house over 1,700 employees when it opens and will provide room for growth. As explained in Mercy Health’s letter (see Attachment A), these additional numbers will enable it to standardize its dialing plans and provide numbers for additional employees at its new headquarters, including new call center employees that may be added in the future. In order to integrate the new numbers with its existing dialing plan, Mercy Health has requested the 4000 through 6000 blocks, although the specific NXX does not matter. Although Mercy does not anticipate returning any full thousands-blocks, it will return to CBT any existing DID blocks that it frees up if it reassigns numbers to the new thousands block.

CBT has reviewed its number inventory and it does not have 3,000 contiguous numbers available in the Cincinnati rate center. However, as shown on the attached Pooling Administration System Worksheet, CBT’s request for three new thousands

² Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration*, CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362 (rel. Dec. 28, 2001) at ¶64.

³ *Id.*

blocks to serve this customer was rejected because it does not meet the Months to Exhaust and Utilization threshold (see Attachment B).

The customer anticipates that it will be ready to turn up some of the numbers for testing in November 2015. Therefore, CBT requests that this request be expedited to ensure that the numbers can be activated in early November. Given the 33-day period that is required from the date of application to the activation date, Commission action on this petition would be required by the end of September 2015 to ensure the numbers are available for the customer's use in early November.

Conclusion

For the reasons set forth above, CBT requests that the Commission overturn the PA's decision and direct the PA to grant CBT's requests for three thousands blocks in the Cincinnati rate center to satisfy the needs of its customer. Furthermore, CBT requests that the Commission act expeditiously on this request.

Respectfully submitted,

/s/ Douglas E. Hart
Douglas E. Hart (0005600)
441 Vine Street, Suite 4192
Cincinnati, Ohio 45202
(513) 621-6709
(513) 621-6981 fax
dhart@douglasshart.com

Attorney for Cincinnati Bell
Telephone Company LLC

ATTACHMENT A

Mercy Health IT
4600 McAuley Place
Suite 100
Cincinnati, Ohio 45242
(513) 981-6000

The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

September 8, 2015

Dear Commissioner's,

Please accept this letter as a formal request for a block of 3,000 consecutive/sequential DID numbers that will be used for our new Corporate Headquarters in Cincinnati, Ohio. We looking for (513)xxx-4000 through (513)xxx-6999.

The need for this request is created by Mercy Health's continued growth and commitment to patients we serve in Ohio and Kentucky. Mercy Health is the largest health system in Ohio with 30,000+ employees, and also the fourth largest employer in the state. The 3,000 DID's will enable Mercy Health to continue to standardize our dial plans, integrate with our corporate wide 7 digit dialing, and provide numbers to new employees joining our organization. In addition the numbers may be required in the event new call centers are deployed or if new facilities are built. When possible existing blocks of DID's will be given back after they are no longer required in the dialing plan.

The New Mercy Health Corporate office will be a state-of-the-art facility designed to take full advantage of technology in the service and support of patients, families, care providers and staff including the following:

- Provide technical support for electronic medical records with physician order entry
- Provide central Wireless support for cell phones allowing staff to receive alerts from the patients to whom they are assigned including monitor alarms, nurse call requests, phone calls from families and physicians
- Provide technical support to hospitals allowing patient location system to promote secure communication regarding the special needs of patients, communication when patients are taken out of their rooms for treatment and rapid turnaround of beds to prepare for new admissions

- Distributed antenna system providing seamless cell phone coverage within the facility for major cell carriers
- Provide support to hospitals to allow Interactive television system via flat-screen TVs providing information, education and entertainment to patients and families
- Provide support for Hospitals to allow wireless coverage for telemetry signals allowing monitored patients to move at will within the facility
- Provide support to hospitals to allow wireless coverage for the network across all areas of the property, with guest wireless access available for patients and, families
- Secure remote communication to the all Mercy Hospitals and care providers who are offsite can access systems and diagnostic information on their patients
- Provide technical support for Radiology and cardiology PACS (picture archiving and communication systems) either onsite or accessed via network connectivity, to provide the highest quality diagnostic information available. Access to PACS images on high resolution monitors positioned throughout the facility including trauma rooms
- Bar coded medication administration to enhance patient safety
- Voice-over-IP telephone technology
- Fully redundant fiber network throughout the facility and connecting the facility to the organization's data center and acute care locations.

Please consider our request for 3,000 DID numbers to support our growing health care organization. In the event there are any questions or additional information required please feel free to contact me.

Respectfully,

Nick Neysari

Mercy Health – Information Technology

Senior Telecom Engineer/Team Lead, Telecommunications

nneysari@mercy.com



ATTACHMENT B

Cozad, Denise

From: agnes.rom@neustar.biz
Sent: Friday, August 28, 2015 1:49 PM
To: Setser, Cathy; Cozad, Denise
Cc: PA_Part3@neustar.biz
Subject: 513-CINCINNATI-OH-870648 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 28 August 2015

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 513-CINCINNATI-OH-870648

Date of Application: 08/28/2015 Effective Date: _____
Date of Receipt: 08/28/2015 Date of Response: 08/28/2015

Service Provider Name: CINCINNATI BELL, INC.
(iconectiv™ LERG™
Routing Guide) OCN: 9348
Parent Company OCN: 9348

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

NRWDOHNWDS0

Rate Center:

CINCINNATI

☒ 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)



Pooling Administration System

Sign Out

denise.cozad@cinbell.com (SP)

Time : 08/28/2015 01:32:44 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Effective Date Change
 - Block Modification
 - Block Disconnect
 - Cancel Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
 - Copy Block Request
 - Attach Documents
- CO/NXX Code Requests
- Withdraw Pending Requests
- Intra SP Block Port Requests
- PSTN Activation
- Confirm Resources In Service
- Submit Forecast
- Search Forms
- Reports
- User Profile

Part1A

Type of Application: Now Block

Validation Error

You must correct the following error(s) before proceeding:

- Type of Request (Initial/Growth) is required.

For assistance, please contact the Help Desk at 866-NeuPool (866-638-7665).

[View Pool Replenishment Status](#)

1.1 Contact Information :

Note: If any of the contact information is incorrect, edit your user profile.

Block Applicant:

Company Name: CINCINNATI BELL, INC.

Headquarters Address: 201 E 4th Street
City: Cincinnati
State: OH
Zip: 45202

Contact Name: Denise S Cozad

Contact Address: 209 E4th Street, 121-1075
City: Cincinnati
State: OH
Zip: 45202
Phone: 513-566-4130
Fax: 513-651-9089
Email: denise.cozad@cinbell.com

Pooling Administrator¹:

Name: Agnes Rom
Address: 1800 Sutter St
City: Concord
State: CA
Zip: 94520
Phone: 925-363-7650
Fax: 925-363-7681
Email: agnes.rom@neustar.biz

1.2 General Information

NPA: 513

922

LATA:

OCN:^{iv} 9348-CINCINNATI BELL, INC.

Parent Company OCN:^{*} 9348

Number of Thousands-Blocks
Requested: 3

Switch Identification (Switching
Identity/POI) ^v * NRWDOHNWDS0

Rate Center^{vi} CINCINNATI

1.3 Dates

Date of
Application^{vii} Friday, August 28, 2015

Requested
Expedited
Treatment ☐ Yes ☒ No

☒ 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.

Requested
Effective
date^{viii} 09/28/2015 MM/DD/YYYY

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of
Service
Provider^{*} Incumbent Local Exchange Carrier (ILEC)

b) Primary
Type of Service
Blocks to be
used for^{*} Wireline

c) Thousands-
Block(s)
(NXX-X)
assignment
preference
Click here to
see the
available blocks
in the pool.
513-XXX-4000 Through 513-XXX-6999
Consecutive/sequential numbers. To work with
their current phone system. Thank you

NOTE: The
blocks
available list
shows blocks
that are
available at
the time a
request is
submitted.
These same
blocks may
not be
available at
the time the
request is
processed.
Therefore, it is
recommended
that you
provide

additional
block
preferences in
the event
those blocks
are not
available.

d) Thousands-
Block(s) (NPA-
NXX-X) that are
undesirable for
this
assignment, if
any

1.5 Type of Request*

☐ Initial block for rate center Or ☒ Growth block for rate center

☐ 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.

Remarks:

Customer is Building a New Location for a Hospital

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.

Continue

Cancel

Save

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

Pooling Administration System

Sign Out

deniso.cozad@cinbell.com (SP)

Time: 08/28/2015 01:42:15 PM EDT

Individual Block Requests

- New Block Request
- New Block Reservation
- Assign/Cancel/Extend Reservation
- Block Effective Date Change
- Block Modification
- Block Disconnect
- Cancel Block Disconnect
- Saved Block Requests
- Modify Pending Request
- Copy Block Request
- Attach Documents

CO/NXX Code Requests

- Withdraw Pending Requests
- Intra SP Block Port Requests
- PSTN Activation
- Confirm Resources In Service
- Submit Forecast
- Search Forms
- Reports
- User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date: Friday, August 28, 2015

OCN 9348

Company Name CINCINNATI BELL, INC.

Rate Center: CINCINNATI

List all Codos NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)²:-

513-206-1 513-215 513-221-0,1,2,3,4,5,6,7,8 513-230 513-231 513-232 513-233-0,2,3,4,6,9 513-241 513-242 513-243 513-244 513-245-0,1,2,3,5,6,7,9 513-246 513-247 513-251 513-263-1,2,3,4,5,6,7,8,9 513-271 513-272 513-277-2,3,5,6,7,8 513-281 513-

Name of Block Applicant: Denise S Cozad

Title: Technical Clerk 3

Phone: 513-566-4130

Fax: 513-651-0089

E-Mail: deniso.cozad@cinbell.com

A. Available Numbers: 604688

B. Assigned Numbers: 1157354

C. Total Numbering Resources: 1762042

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation³:- 0

List excluded Code(s) or Block(s)

E. Growth History Previous 6-months⁴:-

Month 1	10412	Month 2	1282
Month 3	2393	Month 4	1878
Month 5	1754	Month 6	139

F. Forecast Next 12 months⁵:-

Month 1	1625	Month 2	1625
Month 3	1625	Month 4	1625
Month 5	1625	Month 6	1625
Month 7	1625	Month 8	1625
Month 9	1625	Month 10	1625
Month 11	1625	Month 12	1625

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

1625.0

H. Months to Exhaust⁶ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	604688	372.116
2	605688	372.731
3	606688	373.346

I. Utilization⁶(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 65.693

Explanation

Continue Show Calculations Save Cancel

Pooling Administration System

Sign Out

denise.cozad@cinbell.com (SP)

Time : 08/28/2015 01:46:22 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel/Extend Reservation
 - Block Effective Date Change
 - Block Modification
 - Block Disconnect
 - Cancel Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
 - Copy Block Request
 - Attach Documents

- CO/NXX Code Requests
- Withdraw Pending Requests
- Intra SP Block Port Requests
- PSTN Activation
- Confirm Resources In Service
- Submit Forecast
- Search Forms
- Reports
- User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level
(Continued)¹

Your Utilization calculates to 65.683%. The FCC requires a utilization of 75%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- ☐ Return to the Months To Exhaust Form
- ☒ Need to request a State Waiver
- ☐ Received a State Waiver
- ☐ Over-Contaminated Block Exception

Submit

Cancel

neustar

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Last updated: August 28, 2015

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/9/2015 11:47:56 AM

in

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

Summary: Petition of Cincinnati Bell Telephone Company LLC for Review of a Decision of the Number Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Telephone Company LLC