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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Investigation into Telephone Numbering and) Case No. 10-884-TP-UNC
Number Assignment Procedures)

CENTURYTEL OF OHIO INC. DBA CENTURYLINK
REQUEST FOR REVIEW OF A DECISION OF NEUSTAR - POOLING
ADMINISTRATOR

CenturyTel of Ohio Inc. d/b/a CenturyLink ("CenturyLink") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") direct NeuStar, the Pooling Administrator ("PA"), to provide CenturyLink with an uncontaminated consecutive thousand number block in the Avon wire center of the Avon Ohio rate center to satisfy the request of a CenturyLink customer.

BACKGROUND

This customer is requesting 500 consecutive numbers for use within their large facility complex. They requested consecutive numbers in the 440-695-5XXX range. Any block that begins with 0XXX, 1XXX, or 9XXX will not work with this customer's calling plan.

CenturyLink reviewed the customer's request and determined that it did not have the requested consecutive number block available within the Avon rate center.

The original request for 500 consecutive numbers resulted in CenturyLink submitting on October 26, 2015 a Thousand Block Application Form – Part 1A to the PA for the assignment of a consecutive uncontaminated number block necessary to meet this customer's needs. A copy of this application is attached. (Exhibit A). CenturyLink completed the application in accordance with the Thousands Block Number (NXX-X)

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician DMS Date Processed NOV 12 2015

Pooling Administration Guidelines and completed the necessary Months to Exhaust (“MTE”) Certification, attached. (Exhibit B).

On October 26, 2015, the PA, via the Pooling Administration System (“PAS”), denied the request on the grounds that CenturyLink had not met the rate center-based MTE criteria set forth in the NXX Number (NXX) Pooling Administration Guidelines, notwithstanding the fact that CenturyLink does not have the numbering resources needed to satisfy its customer’s request in the switch at issue. This denial of the application received by CenturyLink from the PAS system is attached. (Exhibit C).

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or where the service provider’s inventory did not have a block of numbers large enough to meet a customer’s specific request. Under existing procedures, the PA looks at the number of months-to-exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC’s Third Report and Order in the Numbering Resource Optimization docket states 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 specific customer request.” Also, paragraph 64 indicates that “States may not accommodate requests for specific numbers (i.e. vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers.” Therefore, this Commission has the authority to review the PA’s decision and reverse it when appropriate.

CenturyLink’s request to obtain the required numbering resources from NeuStar was not processed because CenturyLink does not meet the two required FCC criteria to obtain numbering resources in the Avon rate center. The FCC requires a months-to-exhaust (MTE) of 6 months or fewer. CenturyLink is at a 35.022 MTE due to the low

growth forecast and inventory that does not qualify for donation. In addition, the FCC requires utilization of 75% or higher and CenturyLink is at 62.371%. Thus, neither FCC criteria is met in this case.

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:

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.

CenturyLink submits that this customer's request constitutes special circumstances and demonstrates a clear requirement that warrants the Commission's review and reversal of NeuStar's decision.

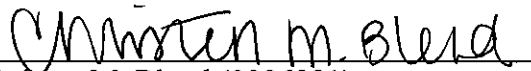
Copies of the thousand-block application, the MTE certification, NeuStar's denial, and a copy of the customer's request letter are attached and incorporated herein as Exhibits A, B, C, and a redacted version of Exhibit D, respectively. The confidential, unredacted Exhibit D is filed under seal subject to the accompanying Motion for Protective Order.

CONCLUSION

CenturyLink respectfully requests that the Commission review and reverse the PA's decision to withhold numbering resources because it violates the intent and requirements of the FCC in allowing carriers access to numbering resources to meet

specific customer demands upon a sufficient showing of need. The PA's denial of numbering resources interferes with CenturyLink's ability to serve its customer. CenturyLink requests expedited treatment of its request due to the urgent needs and the timeline of the customer and that the Commission overturn the PA's decision and instruct it to release the numbering resources necessary to meet the needs of this customer.

Respectfully submitted,

A handwritten signature in black ink that reads "Christen M. Blend". The signature is written in a cursive, flowing style.

Christen M. Blend (0086881)
Porter Wright Morris & Arthur, LLP
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Counsel for CenturyTel of Ohio, Inc. d/b/a
CenturyLink

EXHIBIT A

Thousands-Block Application Form - Part 1A to Neustar

Thousands-Block Application Form - Part 1A

Tracking Number: **440-AVON-OH-881909**
Individual Block Request

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **CENTURYTEL OF OHIO, INC. DBA CENTURYLINK**

Headquarters Address: **100 CenturyLink Dr**

City, State, Zip: **Monroe, LA, 71203**

Contact Name: **Rita Schmitz**

Contact Address: **333 N Front Street**

City, State, Zip: **La Crosse, WI, 54601**

Phone: **608-796-5600** Fax: E-mail: **Rita.Schmitz@CenturyLink.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 _____

NPA: 440 LATA: 320 OCN: ^{iv} 0630 Parent Company's OCN 0630

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI) : ^v
AVONOHXARS1

Rate Center: ^{vi} AVON

1.3 Dates:

Date of Application: ^{vii} 10/26/2015

Requested Block Effective Date:
^{viii} 11/26/2015

☒ 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 : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 440-695-5
- 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 ^{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.

Rita Schmitz

Process Analyst II

10/26/2015

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 iconectivTM LERGTM 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 CLLITM 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. They 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

EXHIBIT B

Months to Exhaust and Utilization Certification Worksheet

(Thousands-Block Number Pooling Growth Block Request)

Company Name: CENTURYTEL OF OHIO, INC.
DBA CENTURYLINK

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: ~~440-695-4,440-934,440-937~~

FAX No.:

E. Growth History - Previous 6 months ⁴	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
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F. Forecast

- Next 12 months⁵ 1000 0 0 0 0 0 0 0 0 0 0

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):166.667

H. Months
to Exhaust⁶
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested
1

Available Numbers
5837

Months To Exhaust
35.022

I.

Utilization⁷
=

Assigned Numbers(B)

X 100 =

62.371

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 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))

EXHIBIT C

Pooling Administrator's Response/Confirmation

TBPAG Part 3 - Block Application Denial from Neustar

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 440-AVON-OH-881909

Date of Application: 10/26/2015 Effective Date: _____
Date of Receipt: 10/26/2015 Date of Response: 10/26/2015

Service Provider Name: CENTURYTEL OF OHIO, INC. DBA CENTURYLINK

(iconectivTM LERGTM Routing Guide) OCN: 0630
Parent Company OCN: 0630

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

AVONOHXARS1

Rate Center:

AVON

X 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)

EXHIBIT D

Redacted in its Entirety

Complete Copy Filed Under Seal