

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investigation into)
Telephone Numbering and Numbering Assignment) Case No. 10-0884-TP-UNC
Procedures)

PETITION OF THE OHIO BELL TELEPHONE COMPANY
D/B/A AT&T OHIO AND/OR AMERITECH OHIO
FOR REVIEW OF A DECISION OF NEUSTAR - POOLING ADMINISTRATOR

The Ohio Bell Telephone Company d/b/a AT&T Ohio and/or Ameritech Ohio ("AT&T"), 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 AT&T's request for numbering resources, as more fully described herein.

An Ohio customer, Premier Health, Atrium Medical Center ("Premier Health"), has requested 10,000 numbers (513-XXX-0000 through 513-XXX-9999) in the Middletown rate center. Premier Health is in the process of streamlining their IT/Telecom platform and has requested these numbers for use at their One Medical Center Drive, Franklin, Ohio center. This request is reflected in the customer letter. AT&T has developed a communications plan that Premier Health, will implement, and will subsequently assign the 10,000 numbers within 180 days of the numbers being made available to the enterprise.

The Middletown rate center, in the 513 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 February 17, 2016, AT&T 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”). AT&T requested 10 number blocks in the Middletown 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 AT&T 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 10,000 numbers in the format 513-XXX-0000 through 513-XXX-9999. Therefore, AT&T needs to obtain the number blocks in order to satisfy the customer’s request.

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

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.

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." AT&T submits that Premier Health's 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 AT&T's Thousand Block Application Form, the Months-to-Exhaust Certification Worksheet, a copy of NeuStar's denial, (attached collectively as Exhibit A) and a copy of Premier Health's letter of intent (Exhibit B).

For the reasons set forth herein, AT&T respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Middletown rate center to AT&T for use by Premier Health.

Respectfully submitted,

By: /s/ Douglas W. Trabaris
Douglas W. Trabaris
AT&T Services, Inc.
225 W. Randolph Street, Floor 25D
Chicago, Illinois 60606
312-727-6705
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Attorney for The Ohio Bell Telephone Company
d/b/a AT&T Ohio and/or Ameritech Ohio

EXHIBIT A

**Thousands-Block Application Form
Part 1A****Type of Application (check one):** ☒ **New** ☐ **Changeⁱ** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: AT&T CORPORATIONHeadquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Contact Name: PRISCILLA TAYLORContact Address: 5001 EXECUTIVE PARKWAY, 3W200V City SAN RAMON State CA Zip 94583Phone: 925-543-1524 Fax: 925-355-9268E-Mail: pt3145@att.com**Pooling Administratorⁱⁱ:**

Contact

Name: Kevin GatchellContact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520Phone: 925 363 7653 Fax: 925-363-7686E-Mail: kevin.gatchell@neustar.biz**1.2 General Information`****Check one: No LRN needed** ☒ **LRN neededⁱⁱⁱ** _____NPA: 513 LATA: 328 OCN^{iv}: 9321 Parent Company's OCN 9300Number of Thousands-Blocks Requested: 10Switch Identification (Switching Entity/POI)^v: MDTWOH42DS1 City or Wire Center Name _____Rate Center^{vi}: MIDDLETOWN Rate Center Sub Zone: _____**1.3 Dates**Date of 02/17/2016 Requested Block Effective Date^{vii}: _____Request Expedited Treatment? (See Section 8.6) Yes ☒ No**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: WIRELIN

c) Thousands-Block(s) (NXX_X) preference _____

d) Thousands-Block(s) (NXX-X) that is undesirable for this assignment, if _____

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) _____.

**Thousands-Block Application Form
Part 1A****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

Change block: Yes____, If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect 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____
-

Remarks: **SAFETY VALVE WAIVER REQUEST – PREMIER HEALTH/ ATRIUM MEDICAL CENTER**

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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>PRISCILLA TAYLOR</u>	<u>CODE ADMINISTRATOR</u>	<u>02/17/2016</u>
Signature of Block Applicant	Title	Date

Thousands-Block Application Form Part 1A

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 Telcordia™ 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 Telcordia™ 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^{viii}. 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, inter-exchange 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 shall 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 must 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.

Thousands-Block Application Form Part 1A

Foot Notes:

ⁱ Identify type of and reason for 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 CLLI™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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).

^{viii} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

MISSING PART 1A FORM

To: CODE ADMINISTRATION AIT
CC: Cheree Dunlap
Subject: New Tracking Number __ _OH00000844

Was created in PROD _2_ on __February 16, 2016____ to request _10_ K-Block in Rate Center _MIDDLETOWN **(IL only)** Rate District

Sales Contact Name and Telephone Number: Erick Stricker, es7636; 513-448-7436

MISSING PART 1A DATA:

LATA: ____**328**____

MISSING APPENDIX (3) DATA:

SECTION B - ASSIGNED NUMBERS = ____34,564_____

SECTION C - TOTAL NUMBERING RESOURCES = ____69,998_____

(Explanation of any available blocks on Regulatory Questionnaire)

Appendix 3 - Modified August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)

Date 02/17/2016

OCN: 9321 Company Name: AT&T – Ameritech Ohio

Rate Center: Middletown

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (5) ; NPA/NXX-X (17)

Name of Block Applicant: PRISCILLA TAYLOR Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-543-1524 FAX No.: 925-355-9268

E-Mail: PT3145@att.com

A. Available numbers: 31810

B. Assigned numbers: 34564

C. Total Numbering Resources: 66998

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0

List excluded Code(s) or Block(s):

	Month #1 <u>-23</u>	Month #2 <u>-156</u>	Month #3 <u>-24</u>	Month #4 <u>-6</u>	Month #5 <u>-50</u>	Month #6 <u>-15</u>	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months ²	<u>0</u>	<u>0</u>	<u>10009</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>-15</u>	<u>-17</u>	<u>-32</u>	<u>-47</u>	<u>-31</u>	<u>-26</u>
F. Forecast – Next 12 months ³												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>1668.167</u>									<u>19.069</u>		
H. Months to Exhaust ⁴	<u>Numbers Available for Assignment to Customers (A)</u>									=		
	<u>Average Monthly Forecast (G)</u>											
I. Utilization ⁵	<u>Assigned Numbers (B)</u>											
	<u>Total Numbering Resources (C) – Excluded Numbers</u>											
	<u>(D)</u>											
							<u>* 100</u>			=	<u>51.59%</u>	

¹ 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.

² 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.

³ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴ 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, § 52.15 (g) (3) (iii)).

⁵ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

From: agnes.rom@neustar.biz
To: [BERRIS, PATTY](#); [CODE ADMIN SBC INTERNET SVCS](#); mc0200@att.com
Cc: PA_Part3@neustar.biz
Subject: 513-MIDDLETOWN-OH-900755 DENIED PAS - Part 3 Confirmation
Date: Wednesday, February 17, 2016 4:04:48 PM

Pooling Administration System

Dated 17 February 2016

January 12, 2015

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : **513-
MIDDLETOWN-
OH-900755**

Date of Application:	02/17/2016	Effective Date:	
Date of Receipt:	02/17/2016	Date of Response:	02/17/2016

Service Provider Name:	AMERITECH OHIO
(iconectiv TM LERG TM Routing Guide)	9321
OCN:	
Parent Company OCN:	9300

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:	<u>agnes.rom@neustar.biz</u>	

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 **MDTWOH42DS1**
Rate Center: **MIDDLETOWN**

X Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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 B



Premier Health
110 N. Main Street
Dayton, Ohio 45402

January 19, 2016

Eric Stricker, Account Manager
AT&T HealthCare Client Group | Sr. Client Solutions Executive
525 Vine Street 4th Floor
Cincinnati, OH 45202

Dear Mr. Stricker,

This letter documents our requirements in relation to additional numbering resources. It is understood that AT&T may take this request to the state commission, if needed, to fulfill our request. Premier Health, Atrium Medical Center located at One Medical Center Drive, Franklin, Ohio 45005 is in serious need of expanding our DID range for the purpose of supporting existing new technologies and communication.

Atrium Medical Center is committed to purchasing an entire NXX to utilize 10,000 numbers (513-XXX-0000 through 513-XXX-9999). This will allow us to be 100% DID for patient care access; to include physician office and wireless phones, patient room phones, and nursing stations. Currently the physicians are unable to use our PerfectServe Physicians' answering system call back feature for communication as it cannot accept internal extension numbers.

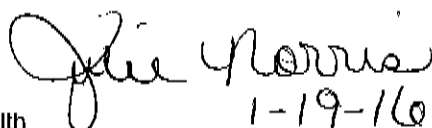
Atrium Medical is in the process of streamlining the IT/Telecom platform in relation to the other Premier hospitals, Miami Valley and Good Samaritan. These sites have AT&T provided DID# number ranges to support 100% direct dialing for patients, physicians and the local communities.

Approval of this request will provide improved patient care and the support of new technology. We plan to keep this entire range as long as the Atrium Medical site exist. This hospital was formerly Middletown Regional and acquired the new name Atrium Medical Center upon moving to the new location in 2007. The location between Dayton and Cincinnati along I-75 is situated for continued growth on our 200 acre campus. The new number range will provide for accelerated marketing in the community and should meet the required needs for the next ten years.

Atrium Medical will keep the existing sporadic DID range in the 513-420-XXXX and 513-705-XXXX for the time being in order to accommodate a migration. Once the migration is complete we will release the current DID#'s back after six months. Once approved our anticipated project date is completion by June 30, 2016.

AT&T is our chosen service provider and we support escalation of this request to the state utility commission. If additional information is required, please let us know.

Sincerely,


Julie Norris
Premier Health
IT Telecom Administrator
One Medical Center Drive, Franklin, Ohio 45005
(513) 705-4797

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/23/2016 4:57:39 PM

in

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

Summary: Petition PETITION OF THE OHIO BELL TELEPHONE COMPANY D/B/A AT&T OHIO AND/OR AMERITECH OHIO FOR REVIEW OF A DECISION OF NEUSTAR - POOLING ADMINISTRATOR electronically filed by Douglas W Trabaris on behalf of AT&T and AT&T Ohio and Ohio Bell Telephone Company and AT&T Entities