

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Investigation into
Telephone Numbering and Number
Assignment Procedure

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Case No. 10-884-TP-UNC

**REQUEST OF FRONTIER NORTH INC. TO
REVIEW DECISION OF NEUSTAR POOLING
ADMINISTRATOR**

Frontier North Inc. ("Frontier") requests that the Commission reverse a decision of the Neustar Pooling Administrator ("Neustar") denying access to numbering resources for Frontier. Frontier seeks this relief because there is a viable need for the numbers.

Frontier submitted the numbering request to Neustar on February 12, 2016 (See Attachment A). Frontier is deploying a new Metaswitch gateway in Wilmington, Ohio to interface with its existing Metaswitch in Fort Wayne, IN. This deployment will allow Frontier to provide VoiP technology in the 328 LATA. In order to deploy this gateway, Frontier must establish a new Local Routing Number (LRN) in the 328 LATA and therefore is requesting a new code in which Frontier would prefer to only utilize the 4 block of that given code. Frontier intends to return the remaining blocks immediately.

On February 12, 2016, Neustar rejected the request (See Attachment B) on the grounds that Frontier does not meet the rate center-based months-to-exhaust criteria as set forth in the Central Office Code (NXX) Guidelines.

The FCC's rules set forth a procedure to bring the denial of a numbering resource by Neustar to the appropriate state commission for review. 47 CFR § 52.15(g)(3){iv}. The FCC's rules allow a state commission to "...overturn the NANPA's decision to withhold numbering

resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for the numbering resource and has exhausted all other available remedies." 47 CFR § 52.15(g)(4).

For the reasons set forth herein, Frontier respectfully requests that the Commission expeditiously overturn the Neustar decision to withhold the numbering resources that Frontier requested and grant the request to allow Frontier to establish the LRN as needed.

Respectfully submitted,

FRONTIER NORTH, INC.

A handwritten signature in cursive script, reading "Michele L. Noble".

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Attachment A

Neustar Application and Denial

____ NPA-NXX-X : _____

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 _____

WLMGOHXBPS0

Rate Center: _____

WILMINGTON

 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)

Attachment B

Months to Exhaust Worksheet

- [Requests](#)
- [Withdraw](#)
- [Pending](#)
- [Requests](#)
- [Intra SP Block](#)
- [Port Requests](#)
- [PSTM](#)
- [Activation](#)
- [Confirm](#)
- [Resources In Service](#)
- [Submit Forecast](#)
- [Search Forms](#)
- [Reports](#)
- [User Profile](#)
- [Individual Block](#)
- [Requests](#)
- [NXX Code](#)
- [Requests](#)
- [New Code](#)

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Forecast Report Date 17 February 2016

NPA 937

Rate Center * Feb2016 Mar2016 Apr2016 May2016 Jun2016 Jul2016 Aug2016 Sep2016 Oct2016 Nov2016 Dec2016 Jan2017

Please Select 0 0 0 0 0 0 0 0 0 0 0 0

Populate

Rate Center * Feb2016 Mar2016 Apr2016 May2016 Jun2016 Jul2016 Aug2016 Sep2016 Oct2016 Nov2016 Dec2016 Jan2017

WILMINGTON 1 0 0 0 0 0 0 0 0 0 0 0

Directions:

Please provide the forecasted number of blocks in each Rate Center that your company expects to take from the pool each month for the next 12 months. Only the total quantity of thousands blocks that are forecasted should be entered. Do not include in the forecast the thousands blocks for full NXX that are already in your inventory. If full NXX(s) is/are forecasted, please reflect this in the thousands blocks, e.g. a full NXX=10 thousands blocks. If any of the forecasted demand above includes the need for a new NXX due to a LPH, please indicate in the space provided below, e.g. a new

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Summary: Request of Frontier North Inc to Review Decision of Neustar Pooling Administrator electronically filed by Michele L Noble on behalf of Frontier North Inc.