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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

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MCIMETRO ACCESS TRANSMISSION SERVICES LLC  
D/B/A VERIZON ACCESS TRANSMISSION SERVICES'  
REQUEST FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR

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MCImetro Access Transmission Services d/b/a Verizon Access Transmission Services ("Verizon") respectfully requests pursuant to 47 C.F.R. § 52.15(g)(3)(iv) that the Public Utilities Commission of Ohio ("Commission") review and overturn a decision of the number Pooling Administrator ("PA") that denied Verizon's request for numbering resources to meet a specific customer request that Verizon could not fulfill using its existing numbering resources.

On April 14, 2016, Verizon<sup>1</sup> filed a request with the PA seeking two Thousand Blocks of telephone numbers in the Reynoldsburg rate center in order to meet a customer request for a contiguous range of 1,500 direct inward dialing numbers ("DID"). See Exhibit 1, which is a true and correct copy of Verizon's Thousands-Block Application Form, Months to Exhaust and Utilization Certification Work Sheet, and the PA's denial thereof. Verizon's existing numbering inventory does not contain a contiguous range of numbers available to meet this customer need.

The PA denied Verizon's request on April 14, 2016 because the Federal Communications Commission ("FCC") requires a months-to-exhaust ("MTE") of six months or fewer, but Verizon's current MTE in one of the two Thousand Blocks in the Reynoldsburg rate center is

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<sup>1</sup> The application was filed in the name of Verizon's predecessor, Intermedia Communications Inc.

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Technician fe Date Processed APR 18 2016

6.868 months (Verizon's MTE in the remaining Thousand Block is under six months). *Id.* In addition, Verizon's utilization level of 65.3% fell short of the FCC's required 75% threshold. *Id.*

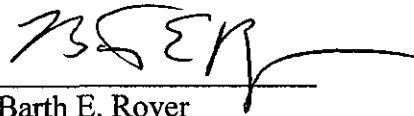
A state commission may overturn the PA's decision based on the state commission's determination that the carrier has demonstrated a verifiable need for the requested numbering resources and has exhausted all other available remedies. *See* 47 C.F.R. § 52.15(g)(4). Similarly, the FCC has held that "a 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 customer request." *See* Third Report and Order and Second Order on Reconsideration, *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, 17 FCC Rcd 252 (rel. Dec. 28, 2001) at ¶ 64. State commissions are permitted to grant such requests provided they are for customers seeking contiguous blocks of numbers, rather than "vanity numbers" *id.*, and this Commission has routinely granted such requests upon a showing that the customer has a legitimate need for the requested contiguous numbers. *See, e.g., In the Matter of the Commission's Consideration of Telephone Safety Valve Requests and Other Number Resource Related Filings*, Case No. 10-884-TP-UNC (Entry dated February 26, 2013, granting Verizon's request to overturn the PA's decision denying the assignment of a single thousands-block of telephone numbers in the Akron rate center.)

In this case, Verizon's customer, McGraw Hill Education ("McGraw Hill"), requires 1,500 contiguous DID numbers in Reynoldsburg, Ohio because it is deploying a new enterprise PBX solution. *See* **Exhibit 2**, which is a true and correct copy of McGraw Hill's letter explaining its business needs. McGraw Hill requires a new range of numbers because the DID

numbers for its current site overlap with its enterprise dialing plan. *Id.* Moreover, once the company transitions to Verizon's call center solution, its agents using the new solution, who do not have DID numbers today, will require them. *Id.* McGraw Hill will suffer significant harm if the PA's decision is not overturned, because its service agents will not be able receive calls. *Id.*

For the foregoing reasons, Verizon respectfully requests that the Commission overturn the PA's decision and direct the PA to grant Verizon's request for two Thousand Blocks in the Reynoldsburg rate center to satisfy McGraw Hill's need for 1,500 contiguous DIDs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. Royer', with a long horizontal flourish extending to the right.

Barth E. Royer  
Barth E. Royer, LLC  
2740 East Main Street  
Bexley, Ohio 43209  
614) 385-1937 - Telephone  
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Attorney for  
*MCImetro Access Transmission Services*  
*d/b/a Verizon Access Transmission Services*

**Exhibit 1**

## TBPAG Attachment 1 - January 12, 2015

## Thousands-Block Application Form - Part 1A

Tracking  
Number: **614-  
REYNOLDSBG-  
OH-915304**  
**Individual Block  
Request**

Type of  
Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION

## 1.1 Contact Information:

Block Applicant:

Company  
Name: **INTERMEDIA COMMUNICATIONS INC. - OH**

Headquarters  
Address: **22001 Loudoun County Parkway**

City, State,  
Zip: **Ashburn, VA, 20147**

Contact  
Name: **Godfrey Chisanga**

Contact  
Address: **2400 N Glenville Dr**

City, State,  
Zip: **Richardson, TX, 75082**

Phone: **972-729-5103** Fax: **972-729-5156** E-mail: **godfrey.chisanga@verizonbusiness.com**

Pooling Administrator: "

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 <sup>iii</sup> \_\_\_\_\_NPA: 614 LATA: 324 OCN: <sup>iv</sup> 7836 Parent Company's OCN 7229Number of Thousands-Blocks Requested : 2Switch Identification (Switching Entity/POI) : <sup>v</sup> CLMBOH11X6ZRate Center: <sup>vi</sup> REYNOLDSBG

## 1.3 Dates:

Date of Application: <sup>vii</sup> 04/14/2016Requested Block Effective Date: <sup>viii</sup> 05/04/2016

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 : 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) non-contaminated contiguous blocks
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any non contiguous blocks are not desirable
- 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 <sup>ix</sup>      Switching Id      Part 1B

OCN: Inter-company <sup>x</sup>      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](mailto:inc@atis.org) as of the date of this application.

**Godfrey Chisanga**

**Snr Network Engineer**

**04/14/2016**

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 iconectiv<sup>TM</sup>

LERG<sup>TM</sup> 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<sup>TM</sup> tandem of the facilities based provider<sup>xi</sup>. 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:

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> 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).

<sup>v</sup> 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<sup>TM</sup> code of the switch /POL.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.



<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> 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 Level<sup>1</sup>**  
**(Thousands-Block Number Pooling Growth Block Request)**

Tracking Number: **614-REYNOLDSBG-OH-915304**Date: **Thursday, April 14, 2016**OCN: **7836**Company Name: **INTERMEDIA COMMUNICATIONS INC. - OH**Rate Center: **REYNOLDSBG**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: **[614-328]-4,[614-490]-3,A,[614-986]-3**Name of Block Applicant: **Godfrey Chisanga**Signature: **Godfrey Chisanga**Title: **Snr Network Engineer 972-729-5156**Telephone No.: **972-729-5103-**

FAX No.:

E-Mail: **godfrey.chisanga@verizonbusiness.com**A. Available Numbers: **923**B. Assigned Numbers: **1959**C. Total Numbering Resources: **3000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: **0**

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

Month	Month	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<sup>4</sup>

<u>4</u>	<u>4</u>	<u>4</u>	<u>3</u>	<u>5</u>	<u>150</u>
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F. Forecast - Next 12 months<sup>5</sup>

<u>1500</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>	<u>36</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):280.0

H. Months to Exhaust<sup>6</sup>

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

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	923	3.296
2	1923	6.868

I. Utilization<sup>7</sup>

$$= \frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{65.3}$$

Explanation: \_\_\_\_\_

<sup>1</sup>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.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>Quantity 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).

<sup>4</sup>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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>6</sup>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, section 52.15 (g) (3) (iii)).

<sup>7</sup>Newly 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 : **614-  
REYNOLDSBG-OH-  
915304**

Date of Application: **04/14/2016** Effective Date: \_\_\_\_\_  
Date of Receipt: **04/14/2016** Date of Response: **04/14/2016**

Service Provider Name: **INTERMEDIA COMMUNICATIONS INC. - OH**

(iconectiv™ LERG™  
Routing Guide ) OCN: **7836**

Parent Company OCN: **7229**

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 : \_\_\_\_\_

**CLMBOH11X6Z**

Switch Identification(Switch  
Entity/POI): <sup>1</sup>

Rate Center:

REYNOLDSBG

☒ 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:

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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 2**



David Mann  
Director Global Network Services


To Whom It May Concern,

We are in dire need of a continuous block of 1,500 DID numbers to support our Customer Service business located at:

MHE Education  
860 Taylor Station Rd.  
Blacklick, OH 43004

- ✓ We require a new block of 1500 DID numbers due to a new enterprise PBX solution being deployed at the site. The current site's DID numbers overlap within the enterprise dialing plan. Due to this overlap, we require a new DID range. We will disconnect the existing DID's and PRI's from ATT once the migration is complete. The additional DID requirement and low % utilization are due to a customer service call center. The agents are currently on our Avaya PBX and these agents do not currently have DID numbers. We're in the process of migrating our call center solution to Verizon OVC and this new cloud solution requires each agent to have a DID number in order to receive incoming customer calls.
- ✓ Quantity and any specific number restrictions with justifications? We require 1500 continuous DID telephone numbers
- ✓ Any supporting negative impacts to the business if the petition for numbers is not approved? All of our customer service agents will be unable to receive calls that generate revenue to our business via the new Verizon OVC Call Center solution.
- ✓ *Digit requirements: NPA-NXX-xxx- the two digits represented by XX cannot be 01, 04, 05, 07, 08, 10, 13, 15, 16, 18, 21, 26, 29, 30, 35, 36, 42, 50, 55, 58, 57, 59, 60, 62, 64, 66, 68, 69, 74, 82, 84, 85, 86, 89 or 93 because they are in use already.*

Thank you for your consideration



David Mann  
Director Global Network Services