## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the matter of the Investigation into Telephone Numbering and Number

Assignment Procedure

Case No: 10-884-TP-UNC

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## <u>PETITION OF FRONTIER NORTH, INC. FOR REVIEW OF A DECISION OF</u> 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 requests to Neustar on November 3, 2016 (See Attachment A). Frontier is deploying Internet Protocol Television (IPTV) in Ohio along with Voice over Internet Protocol (VoiP). This deployment will allow Frontier to provide VoiP technology in the 320 LATA, 325 LATA and 923 LATA. In order to deploy these gateways, Frontier must establish a new Local Routing Number (LRN) in the 320 LATA, 325 LATA, and the 923 LATA and therefore is requesting new codes in which Frontier would prefer to only utilize the 9000 block of those given codes. Frontier intends to return the remaining blocks immediately. In some LATA's, Frontier will also be using the new gateways to interface with new remote equipment being deployed to support the CAF (Connect America Fund) project.

On November 3, 2016, Neustar rejected the requests (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 decisions to withhold the numbering resources that Frontier requested and grant the request to allow Frontier to establish the LRNs as needed.

Respectfully submitted,

FRONTIER NORTH, INC.

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