

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC FOR
REVIEW OF A DECISION OF NEUSTAR - POOLING ADMINISTRATOR

Teleport Communications America, LLC, a subsidiary of AT&T Inc., ("Teleport"), 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 Teleport's request for numbering resources, as more fully described herein.

An Ohio customer, MetroHealth System ("MetroHealth"), has requested 10,000 consecutive numbers in the Brecksville rate center. Metrohealth is the *Safety Net* hospital for Cuyahoga County and is only one of two Level 1 trauma centers serving all of northeastern Ohio. It has recently acquired several Mercy HealthSpan facilities in Cuyahoga County and throughout the state of Ohio. MetroHealth has also recently began a complete transformation of its Main Campus in Cleveland, Ohio to integrate these newly acquired facilities and update the entire Campus. In order to implement a dial plan into all facilities within its expanded campus and throughout the state, MetroHealth is requesting that the NXX not end in 0, 5, 7, 8 or 9. This request is reflected in the Customer's Letter of Intent.¹ Utilizing a communications plan developed by Teleport, MetroHealth will implement, and subsequently assign the 10,000 numbers within 180 days of the numbers being made available to them. MetroHealth currently

¹ A copy of the Customer's Letter of Intent is attached as Exhibit A.

has approximately 17,000 numbers and Mercy HealthSpan possesses over a 1,000. Once the dial plan is operational throughout the MetroHealth system and the numbers assigned, MetroHealth will return all of the current Mercy HealthSpan numbers as well as a large portion of the numbers currently used by MetroHealth that will no longer be needed. MetroHealth will not hold any unused numbers.

The Brecksville rate center, in the 440 area code, began number pooling in April 2002 and therefore, numbering resources are obtained by a Number Pooling carrier through an interface with the PA.² On March 6, 2017, Teleport submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and Utilization”) to the PA³ using the Pooling Administration System (“PAS”). Teleport requested a full code (10 blocks) in the Brecksville rate center and subsequently received an error message indicating the request would not process via the system without a state waiver.⁴ 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 Teleport has adequate telephone numbers in this rate center to satisfy incremental requests, without requesting additional numbers, the inventory cannot satisfy this customer’s specific need for 10,000 consecutive numbers. Teleport’s current inventory is limited to 440-262-1 and 440-

² The federal rules in 47 C.F.R. § 52.15 generalize responsibilities of NANPA and the PA under the heading “Central office code administration”.

³ A copy of the Part1A and MTE worksheet are attached as Exhibit B.

⁴ A copy of the error message is appended as the last page of Exhibit B.

262-2 block with approximately 600 numbers available across the 2 blocks. Therefore, Teleport needs a new code to be opened 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 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." Teleport submits that MetroHealth'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 Teleport's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of MetroHealth's letter of intent.

For the reasons set forth herein, Teleport respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Brecksville rate center to Teleport for use by MetroHealth.

Respectfully submitted,

By: /s/ Mark R. Ortlieb

Mark R. Ortlieb

Assistant Vice President—Senior Legal Counsel

AT&T Svc, Inc.

225 West Randolph Street, 25D

Chicago, IL 60606

312-727-6009

mo2753@att.com

Attorney for Teleport Communications

America, LLC

Exhibit A



February 28, 2017

The MetroHealth System
2500 MetroHealth Drive
Cleveland, OH 44109

AT&T TNAC,

This Letter of Intent represents a request by The MetroHealth System for 10,000 numbers for BVoIP Service. The MetroHealth System intends to order service, in the BRECKSVL rate center, on the BCVLOH5252A switch pending AT&T's successful completion of the required testing. The MetroHealth System intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

The MetroHealth System currently has an existing network configuration and therefore technical restrictions exist in the following blocks. To avoid conflicts with our existing 5 digit dial plan (7xxxx and 8xxxx) we would like a prefix that doesn't end with a 0, 5, 7, a 9.

Block 0 (0000-0999): 216-957-0000-0999 216-778-0000-0999
Block 1 (1000-1999): 216-957-1000-1999 216-778-1000-1999
Block 2 (2000-2999): 216-957-2000-2999 216-778-2000-2999
Block 3 (3000-3999): 216-957-3000-3999 216-778-3000-3999
Block 4 (4000-4999): 216-957-4000-4999 216-778-4000-4999
Block 5 (5000-5999): 216-957-5000-5999 216-778-5000-5999
Block 6 (6000-6999): 216-957-6000-6999 216-778-6000-6999
Block 7 (7000-7999): 216-957-7000-7999 216-778-7000-7999
Block 8 (8000-8999): 216-957-8000-8999 216-778-8000-8999
Block 9 (9000-9999): 216-957-9000-9999 216-778-9000-9999

The MetroHealth System is the safety net hospital for Cuyahoga County and is one of two level one trauma centers serving all of northeastern Ohio. It has recently acquired several HealthSpan locations in Cuyahoga County and is in the process of beginning a complete campus transformation of its Main Campus in Cleveland Ohio.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Paul J. Martucci', with a long, sweeping horizontal line extending to the right.

Paul J. Martucci

Director Supply Chain

Exhibit B

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking
Number: **440-BRECKSVL-OH-994139**

**Full NXX: Dedicated
Customer**

Type of
Application: ☒ New ☐
☒ Change¹ ☐
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**

Headquarters
Address: **One AT&T Way**

City, State, Zip: **Bedminster, NJ, 07921**

Contact Name: **Lisa Loper**

Contact
Address: **One AT&T Way**

City: **Bedminster** State: **NJ** ZIP: **07921**

Phone: **908-234-7622** Fax : **908-234-8044**

E-mail: **lloper@att.com**

Code Administrator:²

Name: **Michael Ortega**

Address: **46000 Center Oak Plaza**

City: **Sterling** State: **VA** ZIP: **20166**

Phone: **866-623-2282** Fax : **571-434-5502**

NXX:³ **440** LATA: **320**
1.2 NPA: **440** OCN:⁴ **7532** Parent Company's
OCN(s) **7125**

Switching Identification (Switching Entity/POI)

⁵**CLEVOH02RMD**

Locality/City/Wire Center:

Rate

Center:⁶**BRECKSVL**Homing Tandem Operating Co.⁷:**ATT**

Tandem Homing

CLLI^{TM8}:**CLEVOH620GT**1.3 DatesDate of Application:**03/06/2017**

Requested Effective

Date:^{9,10}**05/11/2017**

☐ 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 Yes _____ No **X**

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other):

CAP OR CLECb) Type of service (e.g., Cellular - Type 2): **Wireline**c) Code Assignment Preference (Optional) **cannot use a nxx that ends in 0,5,7,8, or 9 (ex xxx-xx0-xxxx cannot be used)**

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐

Tandem Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend

Reservations

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application¹⁴.

Lisa Loper

Signature of Code Applicant

Manager-Code Administration

Title

03/06/2017

Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a

given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language® Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 440-BRECKSVL-OH-994139Date: Monday, March 6, 2017 OCN: 7532 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OHRate Center: BRECKSVLList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 440-262-A, 1, 2Name of Block Applicant: Lisa LoperSignature: Lisa LoperTitle: Manager-Code Administration
908-234-8044Phone: 908-234-7622-

Fax:

E-Mail: lloper@att.comA. Available Numbers: 645B. Assigned Numbers: 1354C. Total Numbering Resources: 2000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³: 0

List

Excluded

Code(s) or

Block(s):

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
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E. Growth

History - Previous 6 months ⁴	<u>0</u>	<u>8</u>	<u>0</u>	<u>10</u>	<u>1</u>	<u>158</u>						
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F. Forecast

- Next 12 months ⁵	<u>10020</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 1686.667

H. Months to Exhaust⁶

Numbers Available for Assignment to Customers (A)

=

Average Monthly Forecast (G)

Block Requested

1

Available Numbers

645

Months To Exhaust

0.382

I.

Utilization⁷

Assigned Numbers (B)

X 100 =

67.7

=

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. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

LOPER, LISA A

From: agnes.rom@neustar.biz
Sent: Monday, March 06, 2017 12:21 PM
To: LOPER, LISA A
Cc: PA_Part3@neustar.biz
Subject: 440-BRECKSVL-OH-994139 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 06 March 2017

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016**Pooling Administrator's Response/Confirmation**

Tracking Number : 440-BRECKSVL-OH-994139

Date of Application: 03/06/2017 Effective Date: _____
Date of Receipt: 03/06/2017 Date of Response: 03/06/2017

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH
(LERGTM Routing
Guide¹) OCN: 7532
Parent Company OCN: 7125

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 (1-1000):

Switch Identification (Switching/POI)²:

CLEVOH02RMD

Rate Center:

BRECKSVL

☒ 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 Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.



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in

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

Summary: Petition PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC FOR REVIEW OF A DECISION OF NEUSTAR - POOLING ADMINISTRATOR electronically filed by Mr. Mark R Ortlieb on behalf of Teleport Communications America, LLC