



221 E. Fourth St.
P.O. Box 2301
Cincinnati, Ohio 45201-2301

February 20, 2018

Ms. Barcy McNeal
Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests and Other Number Resource Related Filings, PUCO Case No. 10-0884-TP-UNC

Dear Ms. McNeal:

Accompanying this letter is a Petition of Cincinnati Bell Extended Territories LLC for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachments are being filed electronically and are contained entirely within this PDF document. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-6671.

Sincerely,

A handwritten signature in black ink that reads "Patricia L. Rupich". The signature is written in a cursive style.

Patricia L. Rupich

cc: Cheryl Williams (via e-mail)
Dan Fullin (via e-mail)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)
Consideration of Telephone Safety Valve) **Case No. 10-0884-TP-UNC**
Requests and Other Number Resource)
Related Filings)

**PETITION OF CINCINNATI BELL EXTENDED TERRITORIES LLC
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

Cincinnati Bell Extended Territories LLC (“CBET”) hereby requests that the Commission review and overturn a decision of the number Pooling Administrator (“PA”) which denied a CBET request for numbering resources. On February 20, 2018, CBET filed a request with the PA seeking 3,000 contiguous numbers in the Mason rate center to meet a specific customer request that CBET was unable to satisfy with its existing numbering resources. The PA denied CBET’s request on the grounds that CBET does not meet the utilization and months-to-exhaust criteria established by the Federal Communications Commission (“FCC”). Under the federal numbering rules, a state commission may overturn the PA’s decision based on its determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹ For the reasons set forth below, CBET submits that the Commission is justified in overturning the PA’s decision and granting CBET’s request for three thousands blocks to meet this customer’s needs.

In its Third Report and Order in the Numbering Resource Optimization proceeding, the FCC found 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

¹ 47 CFR 52.15(g)(4).

customer request.”² It also clarified that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers.³ Therefore, this Commission has the authority to overturn the PA’s decisions under the appropriate circumstances.

Mercy Health’s Request

In the immediate case, CBET has a request from Mercy Health for 3,000 contiguous numbers in the Mason rate center to be used at its Mercy Mason Campus in Mason, Ohio. According to Mercy Health, there are currently over 1,200 employees working out of the Mason Campus and it has plans to add another 1,000 to 2,000 employees to handle call center and revenue cycle management functions. The additional numbers will be used for these employee lines as well as administrative functions. Mercy Health is specifically requesting numbers in the 513-466 NPA-NXX for business continuity purposes since the numbers they currently have at the Mason Campus are from that NPA-NXX (see customer letter provided in Attachment A). Securing numbers from that same NPA-NXX will enable Mercy Health to maintain a uniform numbering plan at its Mason Campus.

CBET has reviewed its number inventory and it does not have any unassigned numbers in the 513-466 NPA-NXX nor does it have 3,000 contiguous numbers available in the Mason rate center at all. However, as shown on the attached Pooling Administration System Worksheet, CBET’s request for three new thousands blocks to

² Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration*, CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362 (rel. Dec. 28, 2001) at ¶64.

³ *Id.*

serve this customer was rejected because it does not meet the Utilization and Months to Exhaust threshold (see Attachment B).

Conclusion

For the reasons set forth above, CBET requests that the Commission overturn the PA's decision and direct the PA to grant CBET's requests for three thousands blocks from the 513-466 NPA-NXX in the Mason rate center to satisfy the needs of its customer.

Respectfully submitted,

/s/ Patrick M. Crotty

Patrick M. Crotty, Esq. (OH0088733)
Corporate Counsel
Cincinnati Bell Extended
Territories LLC

ATTACHMENT A

Mercy Health

1701 Mercy Health Place
Cincinnati, Ohio 45237
(513) 952-5000

The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

January 24th, 2018

Dear Commissioner's,

Please accept this letter as a formal request for a block of 3,000 consecutive and sequential DID numbers in the 513-466 NPA-NXX that will be used for our expanding Mercy Health Call Center in Mason Ohio. We currently have 513-466-2000 through 513-466-3999. The need for this request is created by Mercy Health's continued growth and commitment to patients we serve. Mercy Health is the largest health system in Ohio with 30,000+ employees, and also the fourth largest employer in the state.

This location staffs approximately 1200 people consisting of call center agents, admin and other Mercy Teams that have a direct impact on patient access, scheduling, customer service and financial counseling. Numbers will also be used for fax lines, alarms and other patient support applications. Consecutive numbers are desired to facilitate a uniform numbering plan that is consistent with the Mercy Health Enterprise dialing plan. The reason for the additional numbers is due to the strategic plan to grow the Call Center and Revenue Cycle Management business requiring 1,000 – 2,000 agents and resources.

Please consider our request for 3,000 consecutive and sequential DID numbers in the 513-466 NPA-NXX to support our growing health care organization. If there are any questions or additional information required please feel free to contact me.

Respectfully,

Jeff McAfee
Mercy Health
Senior Telecom Engineer/Team Lead, Telecommunications
jmcafee@mercy.com



ATTACHMENT B

Pooling Administration System

kimberly.listo@cinbell.com (SP)

Time : 02/20/2018 02:05:57 PM EST

- [-] Individual Block Requests
 - [+] New Block Request
 - [+] New Block Reservation
 - [+] Assign/Cancel/Extend Reservation
 - [+] Block Effective Date Change
 - [+] Block Modification
 - [+] Block Disconnect
 - [+] Cancel Block Disconnect
 - [+] Saved Block Requests
 - [+] Modify Pending Request
 - [+] Copy Block Request
 - [+] Attach Documents
- [+] CO/NXX Code Requests
- [-] Withdraw Pending Requests
 - [+] Withdraw Pending Request
- [+] Intra SP Block Port Requests
- [+] PSTN Activation
- [+] Confirm Resources In Service
- [+] Submit Forecast
- [-] Search Forms
 - [+] View Form
 - [+] List Forms
- [-] Reports
 - [+] Forecast Report
 - [+] Disconnect And Donation Report
 - [+] Part 1/1A Report
 - [+] Part 1B Report
 - [+] Part 3 Report
 - [+] Part 4 Report

Thousands-Block Application Form - Part 1A Revised January 4, 2016

Type of Application: **New Block**

[View Pool Replenishment](#)

1.1 Contact Information :

Note: If any of the contact information is incorrect, edit your user profile.

Block Applicant:

Company Name: **CINCINNATI BELL EXTENDED TERRITORIES LLC - OH**

Headquarters Address: **229 West Seventh Street Room 121-1075**

City: **Cincinnati**

State: **OH**

ZIP: **45202**

Contact Name: **Kimberly D Listo**

Contact Address: **229 West Seventh Street Room 121-1075**

City: **Cincinnati**

State: **OH**

ZIP: **45202**

Phone: **513-565-5605**

Fax: **513-621-2660**

Email: **kimberly.listo@cinbell.com**

Pooling Administratorⁱⁱ:

Name: **Agnes Rom**

Address: **1800 Sutter St**

City: **Concord**

State: **CA**

ZIP: **94520**

Phone: **925-363-7650**

Fax: **925-363-7681**

Email: **agnes.rom@neustar.biz**

1.2 General Information

NPA: 513

-  Assignment Needing Part 4 Report
-  Total Numbering Resources Report
-  User Profile
-  Edit User Profile
-  Reset Password

OCN^{iv}: 309B-CINCINNATI BELL EXTENDED TERRITORIES LLC - OH

Parent Company OCN*:

Number of Thousands-Blocks Requested: 3

Switch Identification (Switching Entity/POI)*

Rate Center^{vi} MASON

1.3 Dates

Date of Application^{vii} Tuesday, February 20, 2018

Requested Expedited Treatment Yes No

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effect the Administrator can grant. Please note that this only applies to a reduction in the Administrator processing time, however the request will still be processed in the order received.

Requested Effective date^{viii} MM/DD/YYYY

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider*

b) Primary Type of Service Blocks to be used for*

c) Thousands-Block(s) (NXX-X) assignment preference
Click here to see the available blocks in the pool.

NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is

processed.
Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.

d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any

1.5 Type of Request*

Initial block for rate center Or Growth block for rate center

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and understand that the underlying CO code may not yet be activated in the PSTN and local NPAC on the block effective date.

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to my knowledge and that this application has been prepared in accordance with the Thousands (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.

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" company name, company headquarters address, a contact within the company, an address contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pool Administrator section also requires the Service Provider to fill in the Pooling Administrator's 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 also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (Local Access Transport Area (LATA), which is a three-digit number that can be found in the Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OC character alphanumeric NECA-assigned Company Code or a four-character alphanumeric code assigned by the iconectiv™ Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of the request 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 exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business for which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be used, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first application 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 PA.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated thousands-blocks on the block they are returning to the pool. Blocks with over 10% contamination (101 TRN) shall not be returned to the pool except when a service provider is exiting the market or is exiting a block that was identified as being over 10% contaminated. 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, 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:

ⁱ Identify type of 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. Related to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies without a 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 company, companies with prior assignments should direct questions regarding appropriate CO Code assignments to TRA (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the pool routing calls. This is the 11 character CLLI™ Code of the switch /POI.

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

^{vii} 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 processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be associated with a PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder.

^{xi} Common Language[®] and Telcordia[®] are registered trademarks and CLLI[™], LERG[™] Routing and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. iconectiv.



Pooling Administration System

kimberly.listo@cinbell.com (SP)

Time

- [-] Individual Block Requests
 - [+] New Block Request
 - [+] New Block Reservation
 - [+] Assign/Cancel/Extend Reservation
 - [+] Block Effective Date Change
 - [+] Block Modification
 - [+] Block Disconnect
 - [+] Cancel Block Disconnect
 - [+] Saved Block Requests
 - [+] Modify Pending Request
 - [+] Copy Block Request
 - [+] Attach Documents
- [+] CO/NXX Code Requests
- [-] Withdraw Pending Requests
 - [+] Withdraw Pending Request
- [+] Intra SP Block Port Requests
- [+] PSTN Activation
- [+] Confirm Resources In Service
- [+] Submit Forecast
- [-] Search Forms
 - [+] View Form
 - [+] List Forms
- [-] Reports
 - [+] Forecast Report
 - [+] Disconnect And Donation Report
 - [+] Part 1/1A Report
 - [+] Part 1B Report
 - [+] Part 3 Report
 - [+] Part 4 Report

Thousands-Block Number Pooling Administration GUI

Revised: January 4, 2016

Months to Exhaust and Utilization Certification

Date: Tuesday, February 14, 2018

OCN 309B

Company Name CINCINNATI BELL

Rate Center: MASON

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)^{2,*}

513-204-0, 1
 229-0, 1, 2, 3
 513-282-6, 7
 486-9 513-6
 770-0, 2, 3,

Name of Block Applicant: Kimberly D Listo

Title: Technical Clerk

Phone: 513-565-5605

Fax: 513-621-2660

E-Mail: kimberly.listo@cinbell.com

A. Available Numbers:*

B. Assigned Numbers:*

C. Total Numbering Resources:*

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation^{3,*}

List excluded Code(s) or Block(s)

E. Growth History -- Previous 6 months^{4,*}

Month 1	<input type="text" value="0"/>	Month 2	<input type="text"/>
Month 3	<input type="text" value="0"/>	Month 4	<input type="text"/>
Month 5	<input type="text" value="0"/>	Month 6	<input type="text"/>

-  Assignment Needing Part 4 Report
-  Total Numbering Resources Report
-  User Profile
-  Edit User Profile
-  Reset Password

F. Forecast – Next 12 months^{5,*}

Month 1	3000	Month 2
Month 3	0	Month 4
Month 5	0	Month 6
Month 7	0	Month 8
Month 9	0	Month 10
Month 11	0	Month 12

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6) 500.0

H. Months to Exhaust⁶ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months
1	1828	3.7
2	2828	5.7
3	3828	7.7

I. Utilization⁶(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Number)
Explanation

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when required for auditing purposes, the applicant must retain a copy of this document.
² Report on all resources for the requested geographic area, including newly acquired blocks.
³ Quantity of numbers activated in the past 90 days is based on blocks and/or codes received 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).
⁴ Net change in TNs no longer available for assignment in each previous month, starting with current month.
⁵ Forecast of TNs needed in each following month, starting with the most recent month as Month 1.
⁶ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be calculated (see (iii)).
⁷ Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15)

Pooling Administration System

[Sign Out](#)

kimberly.listo@cinbell.com (SP)

Time : 02/20/2018 02:09:28 PM EST

- [-] Individual Block Requests
 - [+] New Block Request
 - [+] New Block Reservation
 - [+] Assign/Cancel/Extend Reservation
 - [+] Block Effective Date Change
 - [+] Block Modification
 - [+] Block Disconnect
 - [+] Cancel Block Disconnect
 - [+] Saved Block Requests
 - [+] Modify Pending Request
 - [+] Copy Block Request
 - [+] Attach Documents
- [+] CO/NXX Code Requests
- [-] Withdraw Pending Requests
 - [+] Withdraw Pending Request
- [+] Intra SP Block Port Requests
- [+] PSTN Activation
- [+] Confirm Resources In Service
- [+] Submit Forecast
- [-] Search Forms
 - [+] View Form
 - [+] List Forms
- [-] Reports
 - [+] Forecast Report
 - [+] Disconnect And Donation Report
 - [+] Part 1/1A Report
 - [+] Part 1B Report
 - [+] Part 3 Report
 - [+] Part 4 Report

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

Revised: January 4, 2016

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)¹

Your Utilization calculates to 54.311%. The FCC requires a utilization of 75%. You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver
- Over-Contaminated Block Exception

Submit	Cancel
--------	--------

<ul style="list-style-type: none"> Assignment Needing Part 4 Report Total Numbering Resources Report User Profile Edit User Profile Reset Password	
<p>neustar © 2017 NeuStar, Inc. Legal Notice Last updated: February 20, 2018.</p>	

Listo, Kimberly

From: agnes.rom@neustar.biz
Sent: Tuesday, February 20, 2018 2:10 PM
To: Setser, Cathy; Listo, Kimberly
Cc: PA_Part3@neustar.biz
Subject: , 513-MASON-OH-1076055 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 20 February 2018

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 513-MASON-OH-1076055

Date of Application: 02/20/2018 Effective Date: _____
Date of Receipt: 02/20/2018 Date of Response: 02/20/2018

Service Provider Name: CINCINNATI BELL EXTENDED TERRITORIES LLC - OH
(LERG™ Routing Guide¹) OCN: 309B
Parent Company OCN: 9348

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: **RSMYOHRODS0**
Rate Center: **MASON**

X 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 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.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/20/2018 5:23:04 PM

in

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

Summary: Petition Petition of Cincinnati Bell Extended Territories LLC for Review of a Decision of the Number Pooling Administrator electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Extended Territories LLC