

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Commission's Investigation</b>	)	
<b>Into Telephone Numbering and Numbering</b>	)	<b>Case No. 10-0884-TP-UNC</b>
<b>Assignment Procedures</b>	)	

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**PETITION OF AT&T OHIO FOR REVIEW OF A  
DECISION OF NEUSTAR - POOLING ADMINISTRATOR**

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AT&T Ohio ("AT&T"), 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 AT&T's request for numbering resources, as more fully described herein.

An Ohio customer, City of Columbus, Department of Technology on behalf of Columbus City Schools, ("Columbus Department of Technology"), has requested 8,000 numbers (380-XX1 through XX7-XXXX) in the Columbus rate center.<sup>1</sup> Columbus Department of Technology is in the process of converting the Columbus City School's current Centrex based telephone system to a centralized IP based phone system. Columbus Department of Technology will be converting 166 locations and over 8,000 employees to the new phone system. They would like to maintain the 5-digit dialing pattern and prefer that this block does not contain the current prefix of 365 or that the prefix does not end with 0, 8, or 9. This will allow them to more efficiently configure the new system for the organization. They plan to return the existing DID numbers once the migration is complete within six months of the new block being activated. This request is reflected in the customer letter. AT&T has developed a communications plan that Columbus

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<sup>1</sup> A copy of the letter from The City of Columbus is attached as Exhibit A.

Department of Technology, will implement, and will subsequently assign the 8,000 numbers within 180 days of the numbers being made available to the enterprise.

The Columbus rate center, in the 380 area code, began number pooling in April 2002 and therefore number acquisition by a Number Pooling carrier is gained through an interface with the PA.<sup>2</sup> On March 21, 2018, AT&T submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” (“MTE and Utilization”) to the PA<sup>3</sup> using the Pooling Administration System (“PAS”). AT&T requested 8 number blocks in the Columbus rate center and subsequently received an error message indicating the request would not process via the system without a state waiver.<sup>4</sup> 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 AT&T has adequate telephone numbers, in this rate center, to satisfy incremental requests, without receiving additional numbers, the inventory cannot satisfy the customer’s specific need for 8,000 numbers in the format 380-XX1through XX7-XXXX. Therefore, AT&T needs to obtain the number blocks 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:

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

<sup>3</sup> A copy of the Part1A and MTE worksheet is attached as part of Exhibit B.

<sup>4</sup> A copy of the error message is attached as part of Exhibit B.

(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." AT&T submits that Columbus Department of Technology'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 AT&T's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of NeuStar's denial, and a copy of Columbus Department of Technology's letter of intent.

For the reasons set forth herein, AT&T respectfully requests that the Commission overturn NeuStar's denial and direct NeuStar to assign the requested numbers in the Columbus rate center to AT&T for use by Columbus Department of Technology. We further request that the Commission expedite the request due to the customer needing these numbers.

March 23, 2018

Respectfully submitted,

AT&T Ohio

/s/ Mark R. Ortlieb

Mark R. Ortlieb (0094118)

AT&T Ohio

225 West Randolph, Floor 25D

Chicago, IL 60606

(312) 727-6705

[mo2753@att.com](mailto:mo2753@att.com)

## **Exhibit A**

Date: March 11<sup>th</sup>, 2018

To: Jason Ulbrich, AT&T Senior Account Manager, State of Ohio Account

Requestor: City of Columbus, Department of Technology on behalf of Columbus City Schools  
1111 E Broad Street, 3<sup>rd</sup> Floor, Columbus OH 43205

This letter documents our requirements in relation to additional numbering resources. It is understood that AT&T may take this request to the state commission, if needed, to fulfill our request.

Columbus City Schools is converting their current Centrex based phone system to a centralized IP based phone system. Columbus City Schools central office is located 1091 Kingswood Avenue in Columbus, Ohio. They will be converting 166 locations and over 8000 employees. Our goal is to maintain the current 5-digit dialing pattern, while adding additional DID numbers for every employee, class room, conference room, lunch room, security officer, receptionist desk and other miscellaneous area as needed.

Since the 614 area code cannot provide these consecutive numbers for this request we are requesting a block of 8000 consecutive DID numbers from the 380 area code. We prefer that this block does not contain their current prefix of 365 or that prefix does not end with 0, 8 or 9. This will allow us to more efficiently configure the new system for their organization. We need to activate this DID block in April of 2018 and have a plan to return the current 614-365-xxxx numbers within 12 to 18 months after the conversion of the system or as the DID numbers from the new block are assigned. AT&T is our chosen service provider and we understand that they might escalate this request to the state utility commission. It's important that we know as soon as possible whether or not this request will be granted.



Candace Jones  
Telecommunications Specialist I  
Department of Technology  
1111 E Broad Street,  
Columbus, OH 43205



## **Exhibit B**

**Thousands-Block Application Form  
Part 1A****Type of Application (check one):** ☒ **New** ☐ **Change<sup>i</sup>** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: AMERITECHHeadquarters Address: 5001 EXECUTIVE PKWY City SAN RAMON State CA Zip 94583Contact Name: ROWENA BROWNContact Address: 5001 EXECUTIVE PKWY City SAN RAMON State CA Zip 94583Phone: 925-543-1526 Fax: 925 355 9268E-Mail: rb2548@att.com**Pooling Administrator<sup>ii</sup>:**Contact Name: AGNES ROMContact Address: 1800 SUTTER ST SUITE 780 City CONCORDState CA Zip 94520Phone: 925-363-7650 Fax: 925-363-7681E-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>: 9321 Parent Company's OCN 9300Number of Thousands-Blocks Requested: 8Switch Identification (Switching Entity/POI)<sup>v</sup>: CLMBOH1164A City or Wire Center Name CAORate Center<sup>vi</sup>: COLUMBUS Rate Center Sub Zone: \_\_\_\_\_**1.3 Dates**Date of Application<sup>vii</sup>: 03/21/18 Requested Block Effective Date<sup>viii</sup>: ASAPRequest Expedited Treatment? (See Section 8.6) Yes ☒ X No \_\_\_\_\_**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: POTS/CTX/DIDc) Thousands-Block(s) (NXX-X) assignment preference (optional) 380-XX1-XX7-XXXXd) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any 380-XX0, XX8, XX9 380-365

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) \_\_\_\_\_.



Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

### 1.5 Type of Request

Initial block for rate center: No\_\_\_\_, 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

Change block: No\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:

\_\_\_\_\_

Disconnect block: No\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks: Columbus City Schools

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.

ROWENA BROWN (SIGNATURE ON FILE)

Signature of Block Applicant

CODE ADMINISTRATOR

Title

March 21, 2018

Date

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## **Thousands-Block Application Form**

### **Part 1A**

**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 Telcordia™ LERG™ 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 Telcordia™ 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™ tandem of the facilities based provider<sup>ix</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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

## **Thousands-Block Application Form Part 1A**

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- <sup>i</sup> Identify type of and reason for 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™ code of the switch /POI.
  - <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> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

### Appendix 3 - Modified August 6, 2001

#### MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level <sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Date: 03/21/8 OCN: 9321 Company Name: AMERITECH OHIO

Rate Center: COLUMBUS

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): THERE ARE 84 NXX & 319 NXX-X

Name of Block Applicant: ROWENA BROWN Signature: ON FILE

Title: CODE ADMINISTRATOR Telephone No.: 925-543-1526 FAX No.: 925-355-9268

E-Mail: rb2548@att.com

A. Available Numbers: 433,733

B. Assigned Numbers: 678,037

C. Total Numbering Resources: 1,158,644

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 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
	3163	-4443	-486	-1326	-540	-2474						
E. Growth History – Previous 6 months <sup>2</sup>	0	3842	11777	3980	3679	3515	3632	4268	3297	2657	2957	2656
F. Forecast – Next 12 months <sup>3</sup>												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): <u>4465</u>												
H. Months to Exhaust <sup>4</sup>												
I. Utilization <sup>5</sup>												

Explanation: Actual forecast for Month 1 is -8202

#### COLUMBUS CITY SCHOOLS

<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> 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>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</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, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

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**From:** agnes.rom@neustar.biz  
**Sent:** Wednesday, March 21, 2018 12:38 PM  
**To:** CODE ADMINISTRATION CA; BROWN, ROWENA R  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** , 614-COLUMBUS-OH-1080765 - DENIED PAS - Part 3 Confirmation

Pooling Administration System  
Dated 21 March 2018

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

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

Tracking Number : 614-COLUMBUS-OH-1080765

Date of Application: 03/21/2018  
Effective Date:

Date of Receipt: 03/21/2018  
Date of Response:  
03/21/2018

Service Provider Name: AMERITECH OHIO  
(LERGTM Routing Guide1) OCN: 9321  
Parent Company OCN: 9300

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: CLMBOH1164A

Rate Center: COLUMBUS

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 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 (CLLITM 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.

<[http://web.neustar.biz/html\\_emails/images/barcelona\\_10\\_ns\\_logo2.gif](http://web.neustar.biz/html_emails/images/barcelona_10_ns_logo2.gif)>

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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

Summary: Petition PETITION OF AT&T OHIO FOR REVIEW OF A DECISION OF NEUSTAR  
- POOLING ADMINISTRATOR electronically filed by Mr. Mark R Ortlieb on behalf of AT&T  
Ohio and Ohio Bell Telephone Company