

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Consideration)
Of Telephone Safety Valve Requests and Other) Case No. 10-884-TP-UNC
Number Resource Related Filings.)

PETITION OF MCIMETRO ACCESS TRANSMISSION SERVICES CORP.
D/B/A VERIZON ACCESS TRANSMISSION SERVICES
FOR REVIEW OF NUMBER POOLING ADMINISTRATOR'S
DENIAL OF APPLICATION FOR NUMBERING RESOURCES

2018 MAY 29 AM 10:12

MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services ("Verizon Business"), pursuant to 47 C.F.R. § 52.15(g)(3)(iv), respectfully petitions the Public Utilities Commission of Ohio ("Commission") to review the May 14, 2018 decision of the Number Pooling Administrator ("PA" or "NeuStar") denying Verizon Business's application for use of central office code resources in the Brunswick, Ohio rate center to meet a specific customer request that Verizon Business could not fulfill using its existing numbering resources. Verizon Business further requests that, based on such review, the Commission enter an order as soon as practicable granting Verizon Business a waiver from the PA's decision under the "safety valve" process established by the Federal Communications Commission ("FCC").¹ In support of its petition, Verizon Business states the following:

1. Verizon Business is a telecommunications company that provides, among other things, local exchange telecommunications services in the Brunswick, Ohio rate center.

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Technician WJ Date Processed MAY 29 2018

¹ *In the Matter of Numbering Resource Optimization et al.*, CC Docket Nos. 99-200, 96-98, 95-116. FCC 01-362, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket 99-200 (rel. December 28, 2001), at ¶61; 47 C.F.R. §52.15(g)(4).

1. Verizon Business is a telecommunications company that provides, among other things, local exchange telecommunications services in the Brunswick, Ohio rate center.

2. NeuStar, Inc. ("NeuStar"), the Number Pooling Administrator, is an independent, non-government entity that is responsible for administering and managing numbering resources in pooling areas.²

3. On May 14, 2018, Verizon Business submitted to NeuStar a Thousands-Block Application Form – Part 1A and Months To Exhaust ("MTE") Report requesting the 234-803-5 thousands-block in the Brunswick, Ohio rate center. Copies of the Application Form and MTE Report are attached as Exhibit A.³ This application was submitted to NeuStar as a result of a customer request for 20 contiguous telephone numbers that Verizon Business could not fulfill using its existing numbering resources

4. As explained in detail in the customer request, a copy of which is attached hereto as Exhibit B, the customer requires twenty (20) contiguous numbers in the Brunswick, Ohio rate center that do not start with the numbers 1, 8 or 9, as the customer's corporate policy will not allow phone extensions that start with any of these digits. Failure to secure these numbers will adversely impact the company due to the financial burden to change the existing system.

² See 47 C.F.R. § 52.13 (a) & (b).

³ The May 14, 2018 request to NeuStar was made in the name of MCI Worldcom Communications, Inc. - OH, the predecessor of Verizon Business. Verizon Business is now the provider of service to the customer in question.

5. At the time of the filing of the numbering resource request, the Brunswick, Ohio rate center had an MTE of 316.7 months for the relevant blocks and a utilization of 49.40%.

65. On May 14, 2018, NeuStar denied Verizon Business's request on the grounds that Verizon did not meet the MTE and utilization requirements. NeuStar's response is attached as Exhibit C.

7. Verizon Business cannot use its available inventory of numbering resources to meet this customer's request because its two existing thousands-blocks in the Brunswick, Ohio rate center both begin with the number 8, which the customer cannot use.

8. In FCC Order 01-362, released December 28, 2001 ("FCC Order"), the FCC clarified the authority delegated to state commissions and addressed the "safety valve" process that permits carriers that have not met the utilization criteria to obtain additional numbering resources. 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.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" and that state commissions are permitted to grant such requests provided they are for customers seeking contiguous blocks of numbers, rather than "vanity numbers."⁵

⁴ See 47 C.F.R. § 52.15(g)(4).

⁵ 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.

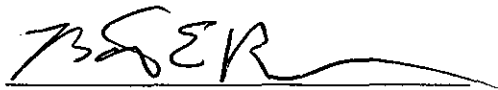
9. As demonstrated by Exhibit B, the customer has a legitimate and verifiable need for the requested numbering resources and has no other available remedies.

10. Accordingly, the Commission should overturn the NeuStar decision withholding numbering resources from Verizon Business and require the release of the requested numbering resources to Verizon Business so that it may assign the 20 contiguous telephone numbers needed to meet its customer's service request.

WHEREFORE, Verizon Business respectfully requests that the Commission:

1. Enter an Order granting Verizon Business relief for one new 1,000 number block assignment, in accordance with the FCC's safety valve process; and
2. Grant the requested relief as soon as possible to avoid any negative impact on the customer's business plans.

Respectfully submitted,



Barth E. Royer (0016999)
Barth E. Royer, LLC
2740 East Main Street
Bexley, Ohio 43209
(614) 817-1331 (telephone)
(614) 817-1341 (facsimile)
BarthRoyer@aol.com (email)

Attorney for
MCI metro Access Transmission Services Corp.
d/b/a Verizon Access Transmission Services

Tracking Number: 330-BRUNSWICK-OH-1093656**Thousands-Block Application Form - Part 1A**
Revised: January 4, 2016**Individual Block**
RequestType of Application: ☒ New ☐ Change ☐ Disconnect**General Application Information**

1.1 Contact Information:

Block Applicant:

Company Name: MCI WORLDCOM COMMUNICATIONS, INC. - OHHeadquarters Address: 13865 Sunrise Valley DrCity: Herndon State: VA ZIP: 20171Contact Name: ruben galvanContact Address: 2637 Summit AveCity: Plano State: TX ZIP: 75074Phone: 972-578-3728Fax: 214-237-1403E-mail: ruben.galvan@xo.comPooling Administrator:ⁱⁱContact Name: Agnes RomContact Address: 1800 Sutter StCity: Concord State: CA ZIP: 94520Phone: 925-363-7650Fax: 925-363-7681E-mail: agnes.rom@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____NPA: 330 LATA: 325 OCN^{iv}: 7443 Parent Company's OCN 7229Number of Thousands-Blocks Requested : 1Switch Identification (Switching Entity/POI^v): AKRNOH25OMDRate Center^{vi}: BRUNSWICK

1.3 Dates:

Date of Application^{vii}: 05/14/2018Requested Effective Date^{viii}: 06/14/2018Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

☐ 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.

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) 234-803-5
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
- 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^{ixl} ☐ Switching Id ☐ Part 1B
- ☐ OCN: Inter-company^{xi} ☐ Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ 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 _____ No _____
- d) Has this block been protected from further assignment: Yes _____ 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

ruben galvan

Signature of Block Applicant

Senior National Code Administrator

Title

05/14/2018

Date

Months To Exhaust Report 5/10/2018

ReportDate: 5/10/2018
 State: OH
 Rate Center: BRUNSWICK
 OCN: 7443
 File Downloaded Time: 5/11/2018 5:06:42 PM

Field	Block 1	Block 2	Block 3	Block 4	Block 5	Block 6	Block 7	Block 8	Block 9	Block 10
Date:	May 10 2018 12:00AM									
OCN:	7443									
Company Name:										
State:	OH									
Rate Center:	BRUNSWICK									
List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s):	(330-558)-8,(330-741)-8									
Name Of Authorized Representative of Company Applicant:										
Title:										
Telephone No.:										
FAX No.:										
E-Mail:										
A. Available Numbers:	950	1950	2950	3950	4950	5950	6950	7950	8950	9950
B. Assigned Numbers:	988	988	988	988	988	988	988	988	988	988
C. Total Numbering Resources:	2000	3000	4000	5000	6000	7000	8000	9000	10000	11000
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:										
List excluded Code(s) or Block(s):										
E. Growth History - Previous 6 months [2] :										
Month#01	1	1	1	1	1	1	1	1	1	1
Month#02	2	2	2	2	2	2	2	2	2	2
Month#03	2	2	2	2	2	2	2	2	2	2
Month#04	0	0	0	0	0	0	0	0	0	0
Month#05	0	0	0	0	0	0	0	0	0	0
Month#06	-7	-7	-7	-7	-7	-7	-7	-7	-7	-7
F. Forecast - Next months1-12 [3]:										
Month #01	3	3	3	3	3	3	3	3	3	3
Month #02	3	3	3	3	3	3	3	3	3	3
Month #03	3	3	3	3	3	3	3	3	3	3
Month #04	3	3	3	3	3	3	3	3	3	3
Month #05	3	3	3	3	3	3	3	3	3	3
Month #06	3	3	3	3	3	3	3	3	3	3
Month #07	3	3	3	3	3	3	3	3	3	3
Month #08	3	3	3	3	3	3	3	3	3	3
Month #09	3	3	3	3	3	3	3	3	3	3
Month #10	3	3	3	3	3	3	3	3	3	3
Month #11	3	3	3	3	3	3	3	3	3	3
Month #12	3	3	3	3	3	3	3	3	3	3
G. Average Monthly Forecast - (Sum of months #1-6 (Item F above) divided by 6):	3	3	3	3	3	3	3	3	3	3
H. Months to Exhaust [4] (Avail #s[A] / Avg mthly Forecast[G])	316.67	650	983.33	1316.67	1650	1983.33	2316.67	2650	2983.33	3316.67
I. Utilization [5] - (Assigned#s[B] - / (Total #s[C] -Excluded #s[D])	49.40%	32.93%	24.70%	19.76%	16.47%	14.11%	12.35%	10.98%	9.88%	8.98%
Explanation:										

Proprietary Disclaimer

The 'TNRV Reporting Engine' system is provided for the use of employees and other authorized users to assist them in carrying out Company business, and is to be solely used for company business. It is a proprietary system and is subject to monitoring at the Company's discretion. Your use of this system implies consent. The Company treats all information and messages transmitted over these systems as business messages, which may be monitored by the Company. Any downloaded information must only be used to carry out Company business. Any other use of the system or data violates the Code of Business Conduct.

The logo for Atlas Copco, featuring the company name in a stylized font with horizontal bars above and below it.

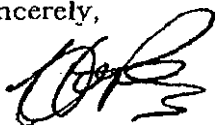
5-2-2018
Landon Swanson
Verizon Business Markets

Landon,
Atlas Copco Rental in Brunswick Ohio has had its business diminished due to the DID numbering issue. We are not allowed to use 9 nine 1 One or 8 Eight as the first number on our phone extensions. The corporate policy is initiated regionally and can not be changed due to the financial burden.

Our request is to receive DID numbers that do not start with 9 nine 1 One or 8 Eight. This is critical to our business and we need this escalated to the highest level. Please reply in with in 48 hours of this request.

The point of contact for this request is:
Eddie Abundiz
281-542-2547
Eddie.Abundiz@us.atlascopco.com

Sincerely,

A handwritten signature in black ink, appearing to read 'Hiram Perez'.

Hiram Perez
Vice President Business Controller
Ph#281-542-2583
Email: Hiram.Perez@us.atlascopco.com

20 DID (Telephone numbers
RATE CENTER (BRUNSWICK)
WIRE CENTER (BRWL0HXA)



Atlas Copco Rental

Atlas Copco Rental LLC
2306 South Battleground Road
La Porte, Texas 77571

Phone: 281.542.2500
Fax: 281.542.2520
Toll Free: 1.800.736.8267
www.AtlasCopcoRental.com



Pooling Administration System

Dated 14 May 2018

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 330-BRUNSWICK-
OH-1093656

Date of Application: 05/14/2018 Effective Date: _____

Date of Receipt: 05/14/2018 Date of Response: 05/14/2018

Service Provider Name: MCI WORLDCOM COMMUNICATIONS, INC. - OH

(LERGTM Routing
Guide¹) OCN: 7443

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 (1-1000): _____

Switch Identification (Switching/POI)²: AKRNOH25OMD

Rate Center:

BRUNSWICK

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.