

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Investigation Into Telephone Numbering) Case No. 10-0884-TP-UNC
And Number Assignment Procedures)

MCIMETRO ACCESS TRANSMISSION SERVICES LLC
D/B/A VERIZON ACCESS TRANSMISSION SERVICES'
REQUEST FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR

Discussion

On March 25, 2020, Verizon¹ filed a request with the PA seeking one Thousand Block of telephone numbers in the Dayton rate center in order to meet a customer request for a contiguous range of 200 direct inward dialing numbers (“DID”). See **Exhibit 1**, which is a true and correct copy of Verizon’s Thousands-Block Application Form, Months to Exhaust and Utilization Certification Work Sheet, and the PA’s denial thereof. Verizon’s existing numbering inventory does not contain a contiguous range of numbers available to meet this customer need.

¹ The application was filed in the name of Verizon's predecessor, Intermedia Communications Inc.-OH

The PA denied Verizon's request on March 25, 2020 because the Federal Communications Commission ("FCC") requires a months-to-exhaust ("MTE") of six months or fewer, but Verizon's current MTE in the Thousand Blocks in the Dayton rate center is 248.62 months. *Id.* In addition, Verizon's utilization level of 48.2% fell short of the FCC's required 75% threshold. *Id.*

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. *See* 47 C.F.R. § 52.15(g)(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." *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. State commissions are permitted to grant such requests provided they are for customers seeking contiguous blocks of numbers, rather than "vanity numbers." *Id.*

In this case, Verizon's customer, Encompass Health Corporation (Encompass), requires 200 contiguous DID numbers in Dayton, Ohio rate center because it is relocating to a larger facility and expanding its DID service to the patient rooms at its new location at 32 Catharine Street, Dayton, OH. In addition, this move is timely as the new facility will be able to support community needs in relation to COVID-19. *See* **Exhibit 2**, which is a true and correct copy of Encompass' letter explaining its business needs. Encompass requires a contiguous range of 200 numbers, where the first digit of the last four digits does not start with a "0" or "9." The preferred DID range should be a square block of numbers (XX00-XX99) in the Thousands-

Block NXX-X assignment of 937-519-8XXX thru 937-519-8XXX to prevent overlap with their existing DID enterprise dialing plan. *Id.* The customer refused the ranges of TNs we offered from our existing inventory because they are not contiguous. Encompass will suffer significant harm if the PA's decision is not overturned, since it would be unable to provide its patients necessary telephone services. *Id.*

Conclusion

Wherefore, for the foregoing reasons, Verizon respectfully requests that the Commission overturn the PA's decision and direct the PA to grant Verizon's request for one Thousand Block in the Dayton rate center to satisfy Encompass' need for 200 contiguous DIDs.

Respectfully submitted,

April 23, 2020

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Tracking Number: 937-DAYTON-OH-1224589

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

Individual Block
Request

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: INTERMEDIA COMMUNICATIONS INC. - OH
Headquarters Address: 13865 Sunrise Valley Dr
City: Herndon State: VA ZIP: 20171
Contact Name: ruben galvan
Contact Address: 2637 Summit Ave
City: Plano State: TX ZIP: 75074
Phone: 469-497-4172 Fax: 214-237-1403
E-mail: ruben.galvan@verizon.com

Pooling Administrator:ⁱⁱ

Contact Name: Agnes Rom
Contact Address: 1800 Sutter St
City: Concord State: CA ZIP: 94520
Phone: 925-420-0129 Fax: 925-420-0377
E-mail: arom@somos.com

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 937 LATA: 328 OCN^{iv}: 7836 Parent Company's
OCN 7229

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching
Entity/POI^v): DYTNOH22XXX

Rate Center^{vi}: DAYTON

1.3 Dates:

Date of Requested Effective
Application^{vii}: 03/25/2020 Date^{viii}: 04/25/2020

Requested 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) 937-519-8
- 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^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ 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 a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) 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

Senior National Code Administrator

03/25/2020

Signature of Block Applicant Title

Date

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

Section 1.1 Contact information requires that Service Providers (SP) 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 (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP 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 Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) 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 (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs 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 (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are 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.

Section 1.6 Service Providers (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) 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).

^vThis is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the Switching Entity/POI.

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

^{vii}Acknowledgment and indication of disposition of this application shall 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.

^{viii}Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

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

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **937-DAYTON-OH-1224589**

Date: **Wednesday, March
25, 2020**

OCN: **7836**

Company Name: **INTERMEDIA
COMMUNICATIONS INC. - OH**

Rate Center: **DAYTON**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **937-234-4, 937-396-6, 937-396-7, 937-401-3, 937-401-4, 937-401-5, 937-401-9, 937-648-0, 937-648-1, 937-648-2, 937-648-3, 937-648-4, 937-648-5, 937-648-6, 937-648-7, 937-648-9,**

Name of Block Applicant: **ruben galvan**

Signature: **ruben galvan**

Title: **Senior National Code Administrator**
4172-

Fax: **214-237-1403**

Phone: **469-497-**

E-Mail: **ruben.galvan@verizon.com**

A. Available Numbers³: **8288**

B. Assigned Numbers: **7712**

C. Total Numbering Resources⁴: **16000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: **0**

List
Excluded
Code(s) or
Block(s):

Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h	Mont h
1	2	3	4	5	6	7	8	9	10	11	12

E. Growth

History -
Previous 6
months⁶

<u>-10</u>	<u>41</u>	<u>-20</u>	<u>-50</u>	<u>-5</u>	<u>-7</u>
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F. Forecast

- Next 12
months⁷

<u>200</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸:33.333

H. Months
to
Exhaust⁹ =

Numbers Available for Assignment to
Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	8288	248.642

I.

Utilization
¹⁰ =

<u>Assigned Numbers (B)</u>	X 100 =	<u>48.2</u>
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Total Numbering Resources (C)-
Excluded Numbers (D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

²List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-

X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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).

⁶Net change in Telephone Numbers (TN) 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.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 937-DAYTON-
OH-1224589

Date of Application: 03/25/2020 Effective Date:
Date of Receipt: 03/25/2020 Date of
Response: 03/25/2020

Service Provider
Name: INTERMEDIA COMMUNICATIONS INC. - OH
(LERGTM Routing
Guide¹) OCN: 7836
Parent Company
OCN: 7229

NPAC SOA SPID :

Pooling Administrator Contact Information:

Agnes Rom Phone: 925-420-0129
Signature of Pooling Administrator
Agnes Rom Fax: 925-420-0377
Name (print)
Email: arom@somos.com

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: DYTNOH22XXX
Rate Center: DAYTON

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 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI™, CLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1 A.



Encompass Health Corporation

2020-03-20

Christopher Vaughan
Systems Engineer III
9001 Liberty Parkway
Birmingham, AL 35232
(800)981-2503

To whom it may concern:

Encompass Health Hospital, Facility ID 03020800 in Dayton OH is in need of 200 contiguous numbers. The hospital is relocating to a larger facility in May and expanding DID phone service to the patient rooms. In order to successfully implement this project, we require a contiguous range of 200 numbers where the first digit of the last four does not start with a "0" or a "9". The range must be a square block of numbers, example (937)396-1000/1199. Existing DID range is (937)424-8200/8399. We would prefer numbers in the (937)XXX-8500/8999 so there would not be number conflict. The Verizon SIP service location for the new hospital is 167622734. The phone number (937)396-6322 is assigned to the sip location 167622734.

The new Hospital Address is:

32 Catharine Street.
Dayton, OH. 45402

Encompass Health Corporation has placed an order with Verizon Business for services requiring 200 contiguous numbers to be put in service by 5/1/2020.

The point of contact for this request is:

Christopher Vaughan, (800) 981-2053
Christopher.Vaughan@EncompassHealth.Com

Sincerely,

Christopher Vaughan
Systems Engineer III
9001 Liberty Parkway
Birmingham, AL 35232
(800) 981-2503

This foregoing document was electronically filed with the Public Utilities

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in

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

Summary: Motion MCIMETRO ACCESS TRANSMISSION SERVICES LLC
D/B/A VERIZON ACCESS TRANSMISSION SERVICES'
REQUEST FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR
electronically filed by Eric Weldele on behalf of Verizon