

FILE

BEFORE

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 )

PUCO

2021 APR -7 AM 11:34

RECEIVED-POCKETING DIV

---

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

---

MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services ("Verizon") respectfully requests pursuant to 47 C.F.R. § 52.15(g)(3)(iv) that the Public Utilities Commission of Ohio ("Commission") review the Pooling Administrator's ("PA") denial of Verizon's request for numbering resources to meet a specific customer request that Verizon could not fulfill using its existing numbering resources. For the reasons set forth more fully below, Verizon respectfully requests that the Commission overturn the PA's decision and direct it to assign the requested blocks to Verizon.

**Discussion**

On March 4, 2021, Verizon<sup>1</sup> filed a request with the PA seeking one full NXX Pool Replenishment Central Office Code of telephone numbers in the Twinsburg Ohio rate center in order to meet a customer request for a contiguous range of 8,000 direct inward dialing numbers ("DID"). See **Exhibit 1**, which is a true and correct copy of Verizon's Central Office Code (NPA-NXX) Application Form Part 1, Thousands Block Application Part1A, Months to Exhaust and Utilization Certification Work Sheet, and the PA's denial thereof. Verizon's

---

<sup>1</sup> The application was filed in the name of MCI Worldcom Communications Inc. – OH (OCN 7443)

**This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.**  
Technician 892 Date Processed 4-7-21

existing numbering inventory does not contain a contiguous range of numbers available to meet this customer need.

The PA denied Verizon's request on March 4, 2021 because the Federal Communications Commission ("FCC") requires a months-to-exhaust ("MTE") of six months or fewer, but Verizon's current MTE in the Blocks in the Twinsburg OH rate center is 5.769, 6.468, 7.167, 7.866, 8.565, 9.264, 9.963, 10.662 months. *Id.* In addition, Verizon's utilization level of 44.973% 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, Verizon Corporate Services Group Inc., requires 8,000 contiguous DID numbers in Twinsburg, Ohio rate center due to an expansion in its technology footprint in Twinsburg, OH. The project includes centralizing the call center platform at the Twinsburg Data Center located at 2000 Highland Road. The project consolidates telephony platforms enabling support of additional at home agents needed to assist our customers during the COVID 19 pandemic. *See* **Exhibit 2**, which is a true and correct copy of Verizon Corporate

Services Group Inc.s' letter explaining its business needs. The request includes a contiguous range of 8,000 DID numbers. The preferred DID range should be square blocks of numbers (X000-X999) in the 234 NPA. *Id.* Verizon Corporate Services Group Inc. will suffer significant harm if the PA's decision is not overturned, since it would impact our ability to implement our desired dial plan and adversely affect how we operate our business and deal with our customers. *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 full NXX Central Office Code of Telephone numbers, to obtain eight Thousand Blocks in the Twinsburg Ohio rate center to satisfy Verizon Corporate Services Group Inc.'s need for 8,000 contiguous DIDs.

April 6, 2021

Respectfully submitted,



Eric D. Weldele (0077276)  
The Weldele Law Group  
88 E. Broad Street Suite 1560  
Columbus, OH 43215  
(614) 783-4951  
[eweldele@wp-lawgroup.com](mailto:eweldele@wp-lawgroup.com)

Carey Gagnon  
Managing Associate General Counsel  
Verizon  
8350 East Crescent Parkway, Suite 200  
Greenwood Village, CO 80014  
(303) 913-9843  
[carey.gagnon@verizon.com](mailto:carey.gagnon@verizon.com)

*Attorneys for MCImetro Access  
Transmission Services Corp d/b/a Verizon*

*Access Transmission Services*

Central Office Code (NPA-NXX) Application - Part 1  
Revised: October 31, 2019

Tracking Number: 234-TWINSBURG-OH-1390702 1.0 GENERAL INFORMATION

Full NXX: Pool Replenishment 1.1 Contact Information:  
Type of Application:  New  Change<sup>1</sup>   
Delete Code Applicant:

Company/Enti MCI  
ty Name: WORLD  
Headquarters COM  
Address: 13865 Sunrise Valley Dr COMMUNICATIONS INC. -  
City, State, OH  
Zip: Herndon, VA, 20171

Contact Name: ruben galvan Name: Patricia Soderland  
Address: 2411 Dulles Corner Park Suite 250  
Contact Address: 2637 Summit Ave City: Herndon  
City: Plano Phone: 571-363-3828

Phone: 469-497-4172

E-mail: ruben.galvan@verizon.com 1.2 NPA: 234 NXX:<sup>3</sup> 320 LATA: OCN:<sup>4</sup>7443  
Code Administrator:<sup>2</sup> : TX ZIP: 75074

: 214Fax  
237-  
1403

State VA ZIP: 20171  
OCN(s) 7229  
State :  
Fax : 571-  
363-  
3838



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 a CO Code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the ThousandsBlock and Central Office Code Administration Guidelines (TBCOCAG) posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.<sup>14</sup>

<u>ruben galvan</u>	<u>Senior National Code Administrator</u>	<u>03/04/2021</u>
Signature of Code Applicant	Title	Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from the North American Numbering Plan Administrator (NANPA).

<sup>3</sup>The NXX field is required for any Central Office (CO) Code (NPA-NXX) request in which there is a change or the CO Code is being returned.

<sup>4</sup>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 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 Telecom Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This 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 eleven-character iconectiv® Common Language Location Identification (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv®, Telcordia®, and Common Language® are registered

trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.)<sup>6</sup>Rate Center name shall be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

<sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Central Office (CO) Code 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 CO Code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup>Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

<sup>11</sup>Select if you are the current Central Office (CO) Code Holder.

<sup>12</sup>Select if you are not the current Central Office (CO) Code Holder.

<sup>13</sup>The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling and shall leave this field blank if it is not.

<sup>14</sup>An incomplete form may result in delays in processing this request.

Tracking Number: 234-TWINSBURG-OH-1390702

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

Full NXX: Pool  
Replenishment

                                             
Type of Application: New Change i                      Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company                      MCI WORLDCOM COMMUNICATIONS INC. - OH

Name:

Headquarters

Address:                      13865 Sunrise Valley Dr

City:                      Herndon                      State:                      VA                      ZIP: 20171

Contact

Name:                      ruben galvan

Contact

2637 Summit Ave

Address:

City:                      Plano                      State:                      TX                      ZIP: 75074

Phone: 469-497-4172                      Fax: 214-237-1403

E-mail: ruben.galvan@verizon.com

Pooling Administrator:<sup>ii</sup>

Contact                      Agnes Rom

Name:

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 needed<sup>iii</sup>:

NPA: 234 LATA: 320 OCN<sup>iv</sup>: 7443 Parent Company's OCN 7229

Number of Thousands-Blocks Requested : 8

Switch Identification (Switching  
Entity/POI<sup>v</sup>): CLEVOHIWDS0

Rate Center<sup>vi</sup>: TWINSBURG

1.3 Dates:

Date of Requested Effective  
Application<sup>vii</sup>: 03/04/2021 Date<sup>viii</sup>: 05/09/2021

Requested Expedited Treatment? (See Section 8.6) Yes  No

Expedited Explanation: I am my own AOCN

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) 234xxx-0, 234-xxx-1, 234-xxx-2, 234-xxx-3, 234-xxx-4, 234-xxx-5, 234-xxx-6, 234xxx-7
- 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) N/A

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<sup>ix</sup>  Switching Id  Part 1B

OCN: Inter-company<sup>x</sup>  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 \_\_\_\_\_  
: \_\_\_\_\_ No
- c) Have all new Intra SP ports been completed in the NPAC: \_\_\_\_\_ No  
Yes
- d) Has this block been protected from further assignment: Yes

Disconnect block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPANXX-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](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

<u>ruben galvan</u>	<u>Senior National Code Administrator</u>	<u>03/04/2021</u>
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<sup>xi</sup>. 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 ThousandsBlock.

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:

<sup>i</sup>Identify the type of change(s) in Section 1.5. <sup>ii</sup>The Pool Administrator (PA) is available to assist in completing these forms.

<sup>iii</sup>A Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

<sup>iv</sup>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).

<sup>v</sup>This 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 CLLI<sup>TM</sup> Code of the Switching Entity/POI. <sup>vi</sup>Rate Center name shall be a tariffed Rate Center.

<sup>vii</sup>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.

<sup>viii</sup>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). <sup>ix</sup>Select if you are the current Thousands-Block Holder. <sup>x</sup>Select if you are not the current Thousands-Block Holder.

<sup>xi</sup>iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>TM</sup>, CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and TPM<sup>TM</sup> Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 2

**Revised: October 31, 2019**

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **234-TWINSBURG-OH-1390702**

Date: **Thursday, March 4, OCN:7443**  
**2021**

Company Name: **MCI WORLDCOM**  
**COMMUNICATIONS INC. - OH**

Rate Center: **TWINSBURG**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: **234-212-5, 234-259-2, 234-259-7, 330-293-2, 330-293-3, 330-293-4, 330-293-5, 330-293-6, 330-293-7, 330-293-8, 330-293-9, 330-840-2, 330-840-3, 330-840-6, 330-888-7,**

Name of Block Applicant: **ruben galvan**

Signature: **ruben galvan**

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

Phone: **469-497-**

Fax: **214-237-1403**

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

A. Available Numbers<sup>3</sup>: **8254**

B. Assigned Numbers: **6746**

C. Total Numbering Resources<sup>4</sup>: **15000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>5</sup>: **0**

List

Excluded

Code(s) or Block(s):

E. Growth    Mont Mont Mont Mont Mont    Mont Mont Mont    Mont Mont    Mont Mont

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

History Previous 6 months<sup>6</sup> **11** **3829** **-3256** **2** **1** **0**

F. Forecast - Next 12 months<sup>7</sup> **8299** **57** **57** **57** **57** **57** **57** **57** **57** **57** **57** **57**

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: **1430.667**

H. Months

Numbers Available for Assignment to

to <sup>9</sup> = Customers (A)

Exhaust

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	8254	5.769
2	9254	6.468
3	10254	7.167
4	11254	7.866
5	12254	8.565
6	13254	9.264
7	14254	9.963
8	15254	10.662

I. Utilization <sup>10</sup> = Assigned Numbers (B) X 100 = **44.97**  
3

Total Numbering Resources (C) Excluded Numbers (D)

Explanation: \_\_\_\_\_

<sup>1</sup>A 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.

<sup>2</sup>List 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-NXXX). 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.

<sup>3</sup>The 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 (NPANXXs) 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).

<sup>4</sup>The 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-NXXXs). 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).

<sup>5</sup>Quantity 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).

<sup>6</sup>Net 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.

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

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This 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)).

<sup>10</sup>This 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)).



If yes, enter the number of TNs contaminated (11000):

Switch Identification (Switching/POI)<sup>2</sup>: CLEVOHIWDS0  
Rate Center: TWINSBURG

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 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:

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

<sup>2</sup> 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 (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

Verizon  
5000 Britton Parkway  
Hilliard, OH 43026

Stephen Reinhard  
MTS IV Consultant Network Services

March 4<sup>th</sup>, 2021 Verizon

Business

Dear Sirs:

Verizon in Twinsburg, OH continues to expand its technology footprint in Twinsburg, OH. We are centralizing our call center platform at our Twinsburg data center located at 2000 Highland Rd in order to consolidate telephony platforms to reduce our expenditures. This will also allow for us to support more work at home agents that we have determined are needed to support our customers during the COVID19 pandemic.

To accomplish this project, Verizon has placed an order with Verizon Business for local telecommunications services for these 8,000 contiguous numbers to be put in service by as soon as possible so we can start assigning numbers from this range to our remote call center agents. This effort will also allow for our agents to determine if a call is a co-worker, or outside customer.

If Verizon Business is not able to acquire these 8,000 contiguous numbers for Verizon, it will impact our ability to implement our desired dial plan and adversely affect how we operate our business and deal with our customers.

The addition of 8,000 contiguous DID numbers will contribute to the simplicity of administrative support, ease of use for our users and cost savings to the corporation.

The point of contact for this request is:  
Stephen Reinhard 614-560-8423  
stephen.reinhard@verizonwireless.com

Sincerely,

Stephen Reinhard  
MTS IV Consultant Network Services

*Stephen E Reinhard.*