

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC, FOR REVIEW OF
A DECISION OF SOMOS - POOLING ADMINISTRATOR**

Teleport Communications America, LLC, a subsidiary of AT&T Inc., (“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 "Somos") denial of AT&T's request for numbering resources, as more fully described herein.

An Ohio customer, Ohio Cat, has requested 30 consecutive numbers in the Grove City rate center.¹ Ohio Cat is adding a dealership and these numbers are for the sales, parts and service departments. AT&T has developed a communication plan that Ohio Cat will implement and will subsequently assign the 30 numbers within 180 days of the numbers being made available to the enterprise.

The Grove City rate center, in the 380 area code, began number pooling in April 2003 and therefore number acquisition by a Number Pooling carrier is gained through an interface with the PA.² On October 12, 2021 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 PA³ using the Pooling Administration System (“PAS”). AT&T requested 1 number block in the Grove City rate center and subsequently received an error message

¹ A copy of the letter from Ohio CAT One is attached as Exhibit A.

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

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

indicating the request would not process via the system without a state waiver.⁴ 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.

AT&T has adequate telephone numbers (~670 available numbers in 380-666-5), in this rate center. However, Ohio Cat declined the use of the available numbers in the 380-666 range due to their religious beliefs.⁵ To satisfy the customer's request, AT&T needs to obtain a new number block. After assigning 30 numbers from the new block to Ohio Cat, AT&T will donate the remainder of the block back to the pool.

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:

(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

⁴ A copy of the error message is attached as part of Exhibit B.

⁵ See Exhibit A.

customers seeking contiguous blocks of numbers." AT&T submits that Ohio Cat's request constitutes special circumstances and demonstrates a clear requirement that warrants the Ohio Commission's review and reversal of the PA's decision.

Attached to this request are copies of AT&T's Thousand Block Application Form, the Months-to-Exhaust Certification, a copy of the PA's denial, and a copy of Ohio Cat's Letter of Intent.

For the reasons set forth herein, AT&T respectfully requests that the Commission overturn the PA's denial and direct it to assign the requested numbers in the Grove City rate center to AT&T for use by Ohio Cat. We further request that the Commission expedite the request due to the customer needing these numbers.

October 19, 2021

Respectfully submitted,

Teleport Communications America, LLC.

/s/ Mark R. Ortlieb

Mark R. Ortlieb (0094118)

AT&T

225 West Randolph, Floor 25D

Chicago, IL 60606

(312) 727-6705

mo2753@att.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served this 19th day of October 2021 by U.S. Mail and/or electronic mail on the parties shown below.

/s/ Mark R. Ortlieb

Mark R. Ortlieb

Daniel Fullin
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
dan.fullin@puco.ohio.gov

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Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Jeffrey.Jones@puco.ohio.gov

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Case No. 10-0884-TP-UNC

**PETITION OF TELEPORT COMMUNICATIONS
AMERICA, LLC, FOR REVIEW OF A DECISION OF
SOMOS - POOLING ADMINISTRATOR**

Exhibit A

Ohio



Ohio CAT

3993 East Royaltan Road
Broadview Heights, OH 44147
800.837.6200 tel
440.526.9513 fax
www.OhioCat.com

Date: 11 October 2021

TNAC:

Please accept this Letter of Intent requesting additional numbering resources. Ohio CAT requests 30 consecutive DID numbers in the Grove City, Ohio rate center.

Ohio CAT is adding a new dealership on November 1, 2021 in Grove City and we need additional phone numbers to support customer calls for sales, parts and service. We are requesting only as many as we need and will not be returning any numbers. The current suggested numbers are in the 380-666 range and due to religious beliefs the NXX range is undesirable.

Pending AT&T's successful completion of testing, Ohio CAT understands these numbers will need to be activated within 180 days of the effective date.

Thank you,

A handwritten signature in cursive script that reads 'Trudy Schwartz'.

Trudy Schwartz

Telecommunications Sr. Analyst

tschwartz@ohiocat.com

440-838-7214

Case No. 10-0884-TP-UNC

**PETITION OF TELEPORT COMMUNICATIONS
AMERICA, LLC, FOR REVIEW OF A DECISION OF
SOMOS - POOLING ADMINISTRATOR**

Exhibit B

Tracking Number: **380-GROVE CITY-OH-1576295**

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: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**

Headquarters Address: **5001 EXECUTIVE PARKWAY 3W200L**

City: **San Ramon** State: **CA** ZIP: **94583**

Contact Name: **Rowena Brown**

Contact Address: **5001 EXECUTIVE PARKWAY 3W200L**

City: **San Ramon** State: **CA** ZIP: **94583**

Phone: **925-543-1526** Fax: **925-355-9268**

E-mail: **rb2548@att.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@nanpa.com**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 380 LATA: 324 OCN^{iv}: 7532 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

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

Rate Center^{vi}: GROVE CITY

1.3 Dates:

Date of Application^{vii}: 10/12/2021

Requested Effective Date^{viii}: 11/12/2021

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) 380-979-5,4,3,1
- 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.

Rowena Brown

Signature of Block Applicant

Senior Network Specialist

Title

10/12/2021

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 CLLI[™] 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.

x Select if you are not the current Thousands-Block Holder.

xi 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.

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

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **380-GROVE CITY-OH-1576295**

Date: **Tuesday, October 12, 2021** OCN: **7532** Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - OH**

Rate Center: **GROVE CITY**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **380-666-5, 614-782-9,**

Name of Block Applicant: **Rowena Brown** Signature: **Rowena Brown**

Title: **Senior Network Specialist**

Phone: **925-543-1526-**

Fax: **925-355-9268**

E-Mail: **rb2548@att.com**

A. Available Numbers³: **682**

B. Assigned Numbers: **1311**

C. Total Numbering Resources⁴: **2000**

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):

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
E. Growth History - Previous 6 months ⁶	<u>62</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>8</u>	<u>0</u>						
F. Forecast - Next 12 months ⁷	<u>1000</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: **175.0**

H. Months to Exhaust⁹ =
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	682	3.897

I. Utilization¹⁰ =
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \mathbf{65.55}$$

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)).

From: arom@nanpa.com
Sent: Tuesday, October 12, 2021 3:20 PM
To: CODE ADMIN ATT CLEC; BROWN, ROWENA R
Cc: pa_part3@nanpa.com
Subject: , 380-GROVE CITY-OH-1576295 DENIED PAS - Part 3A Confirmation

Pooling Administration System

Dated 12 October 2021

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 380-GROVE CITY-
OH-1576295

Date of Application: 10/12/2021 Effective Date: _____
Date of Receipt: 10/12/2021 Date of Response: 10/12/2021

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - OH
(LERG™ Routing Guide¹) 7532
OCN: _____
Parent Company OCN: 7125

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@nanpa.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:

WOTNOHEHAMD

Rate Center:

GROVE CITY

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™, CLLI™, 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 (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/19/2021 10:14:42 PM

in

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

Summary: Petition PETITION OF TELEPORT COMMUNICATIONS AMERICA, LLC, FOR REVIEW OF A DECISION OF SOMOS - POOLING ADMINISTRATOR electronically filed by Mr. Mark R Ortlieb on behalf of Teleport Communications America, LLC