

# THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE COMMISSION'S  
CONSIDERATION OF TELEPHONE SAFETY  
VALVE REQUESTS AND OTHER NUMBER  
RESOURCE RELATED FILINGS.

CASE NO. 10-884-TP-UNC

## ENTRY

Entered in the Journal on November 22, 2022

{¶ 1} On November 9, 2022, Teleport Communications America, LLC, a subsidiary of AT&T Inc. (AT&T), filed a petition seeking a review of the North American Numbering Pooling Administrator's ("the PA" or "Somos") denial of AT&T's request for numbering resources to meet a specific customer's request that AT&T cannot fulfill using its existing numbering resources. Specifically, AT&T requests that the Commission overturn Somos' decision and direct it to assign the requested number block.

{¶ 2} In its filing, AT&T represents that on November 3, 2022, it filed a request with Somos seeking a one thousand block of telephone numbers in the Berea rate center in order to meet a customer request for numbers that will be utilized by the customer as it expands its business into a facility being added within the Berea rate center. According to the attachments accompanying AT&T's petition for review, Somos refused to grant AT&T's request because AT&T does not meet the utilization criteria established by the Federal Communications Commission (FCC).

{¶ 3} AT&T submits that, although it has adequate telephone numbers in the involved rate center to satisfy incremental requests without receiving additional numbers, nevertheless, its existing numbering inventory cannot satisfy the customer's specific need for 600 consecutive numbers with a particular dialing format which the customer requires. Therefore, AT&T needs to obtain one number block to satisfy the customer's request.

{¶ 4} Consistent with 47 C.F.R. 52.15(g), a state commission may overturn the PA's decision based on a determination that the carrier has demonstrated a verifiable need for the requested numbering resources and has exhausted all other available remedies.

{¶ 5} By Entry issued on November 7, 2002, in Case No. 97-884-TP-COI, the Commission, on its own motion, delegated to its legal department the authority to rule, by examiner's entry, on carrier numbering requests, other than those seeking reclamation of entire NXX codes or of particular one-thousand-number blocks.

{¶ 6} After a review of AT&T's petition, the attorney examiner believes that AT&T has demonstrated a verifiable need for its request for a one thousand block of telephone numbers and that it has exhausted all other remedies. Granting the request will enable AT&T to meet the specific needs of its customer for telephone resources. For this reason, the attorney examiner finds that Somos' decision to deny AT&T's resources for additional numbering resources in the Berea rate center should be overturned and Somos should assign a one thousand number block that will allow AT&T to meet its customer's need for numbers that will be utilized by the customer in expanding its business into a facility being added within the Berea rate center.

{¶ 7} However, because the numbering resources being requested are in the 440 number plan area (NPA), the attorney examiner must address the fact that the 440 NPA is currently in a jeopardy situation. On March 30, 2022, the North American Numbering Plan Administrator (NANPA) declared a jeopardy situation for the 440 NPA. At that time, pursuant to §15.4 of the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administrative Guidelines, NANPA established interim jeopardy procedures. Subsequently, on April 13, 2022, NANPA established final jeopardy procedures. These procedures mandate the following:

1. Two requests per operating company number can be submitted per month. If two or fewer Part 1 requests are submitted within the submission timeframe of a particular month, then those requests receive central office (CO) codes. Any part of the base allocation of two

requests that are not assigned in a rationing month will NOT carryover for assignment in the following month.

2. If more than two Part 1 requests are submitted within the submission timeframe of a particular month, the codes will be assigned via a lottery to take place no later than the 10th business day of the month. Code requests that do not receive a code allocation in the current month allocation will be denied and the applicant must submit a new Part 1 request for a future month's allocation.

{¶ 8} Nothing in this Entry is intended to bypass or supersede full application of the jeopardy procedures currently in place, with regards to allocation, if any, of the number resources within the 440 NPA which are the subject matter of the request being addressed by this Entry. A review of AT&T's petition at issue in this case reveals that AT&T, to fulfill its need for a block of one thousand numbers, requested to have Somos open a new CO code to replenish the pool. As stated above, Somos refused to grant AT&T's request because it does not meet the utilization criteria established by the FCC. If, as of the date of this Entry, the two code per month allotment has been fulfilled, this Entry is not intended to alter full application of jeopardy rules currently in place as regards the allocation of the CO code assignments at issue here.

{¶ 9} It is, therefore,

{¶ 10} ORDERED, That AT&T's request to overturn Somos' decision to withhold the requested numbering resources is granted. It is, further,

{¶ 11} ORDERED, That nothing in this Entry is intended to bypass or supersede full application of the jeopardy procedures currently in place, with regards to allocation, if any, of the number resources within the 440 NPA which are the subject matter of the request addressed by this Entry. It is, further,

{¶ 12} ORDERED, That a copy of this Entry be served upon AT&T.

THE PUBLIC UTILITIES COMMISSION OF OHIO

/s/ Daniel E. Fullin

By: Daniel E. Fullin  
Attorney Examiner

GAP/dmh

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

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

Summary: Attorney Examiner Entry that AT&T's request to overturn Somos' decision to withhold the requested numbering resources is granted and that nothing in this Entry is intended to bypass or supersede full application of the jeopardy procedures currently in place, with regards to allocation, if any, of the number resources within the 440 NPA which are the subject matter of the request addressed by this Entry electronically filed by Ms. Donielle M. Hunter on behalf of Daniel E. Fullin, Attorney Examiner, Public Utilities Commission of Ohio