

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Consideration)
of Telephone Safety Valve Requests and Other) Case No. 10-0884-TP-UNC
Number Resource Related Filings)

**MOTION OF DISH WIRELESS L.L.C. FOR AN EXTENSION OF THE
DEADLINE FOR PLACING NEW NUMBERS INTO SERVICE**

Pursuant to Section 4901:1-7-25(C) of the Ohio Administrative Code, DISH Wireless L.L.C. (“DISH”) petitions the Public Utilities Commission of Ohio to issue an extension of the six-month deadline for placing numbers into service within the following Rate Centers (Central Office Codes): MENTOR (440-890); MONTROSE (216-460); PIQUA (937-794); SPRINGFLD (937-717); TROY (937-761); CANTON (234-322); CRESTLINE (567-443); ORRVILLE (330-765); RICHFIELD (234-346); NORTHFIELD (234-808); NEWARK (740-899); and YOUNGSTOWN (234-338). For the reasons discussed in the Memorandum in Support, DISH requests a six-month extension to May and June, 2023, as indicated in DISH’s accompanying memorandum.

Respectfully submitted,

/s/ Dustin B. Rawlin

Dustin B. Rawlin (Ohio Bar 0072870)
NELSON MULLINS RILEY & SCARBOROUGH LLP
1111 Superior Ave, Suite 530
Cleveland, OH 44114
Telephone: 216.304.6104
Facsimile: 216.553.4275
Email: dustin.rawlin@nelsonmullins.com

Attorneys for DISH Wireless L.L.C.

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Consideration)
of Telephone Safety Valve Requests and Other) Case No. 10-0884-TP-UNC
Number Resource Related Filings)

**MEMORANDUM OF DISH WIRELESS L.L.C. IN SUPPORT OF ITS MOTION
FOR AN EXTENSION OF THE DEADLINE FOR PLACING NEW NUMBERS INTO
SERVICE**

DISH Wireless L.L.C. (“DISH”) qualified to receive numbering resources in the following Rate Centers (Central Office Codes): MENTOR (440-890); MONTROSE (216-460); PIQUA (937-794); SPRINGFLD (937-717); TROY (937-688); CANTON (234-322); CRESTLINE (567-443); ORRVILLE (330-765); RICHFIELD (234-346); NORTHFIELD (234-808); NEWARK (740-899); and YOUNGSTOWN (234-338). The North American Number Plan Administrator (“NANPA”) granted to DISH blocks of numbers as follows:

Block of numbers	LERG effective date	NANPA part 4 form due date	Requested extension date
440-890	May 17, 2022	November 17, 2022	May 17, 2023
216-460	May 17, 2022	November 17, 2022	May 17, 2023
937-794	May 21, 2022	November 21, 2022	May 21, 2023
937-717	May 21, 2022	November 21, 2022	May 21, 2023
937-761	May 21, 2022	November 21, 2022	May 21, 2023
234-322	May 26, 2022	November 26, 2022	May 26, 2023
567-443	May 30, 2022	November 30, 2022	May 30, 2023
330-765	May 30, 2022	November 30, 2022	May 30, 2023
234-346	May 31, 2022	November 20, 2022	May 30, 2023
234-808	June 1, 2022	December 1, 2022	June 1, 2023

740-899	June 1, 2022	December 1, 2022	June 1, 2023
234-338	June 6, 2022	December 6, 2022	June 6, 2023

Onboarding of DISH customers is taking longer than expected, but new customers are being added daily. In addition, DISH's work to build out a greenfield 5G network that can provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023 is extensive and DISH has encountered unanticipated delays. DISH respectfully requests a six-month extension of the part 4 submission date to May and June, 2023, as indicated above, to provide adequate time to activate service.

DISH's previous letter requests for extension are attached as Exhibits A, B, C, D, E, F, G, H, I, J, K, and L.

Respectfully submitted,

/s/ *Dustin B. Rawlin*

Dustin B. Rawlin (Ohio Bar 0072870)

NELSON MULLINS RILEY & SCARBOROUGH LLP

1111 Superior Ave, Suite 530

Cleveland, OH 44114

Telephone: 216.304.6104

Facsimile: 216.553.4275

Email: dustin.rawlin@nelsonmullins.com

Attorneys for DISH Wireless L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing has been served this 5th day of January 2023 by electronic mail on the parties shown below.

/s/ *Dustin B. Rawlin*

Dustin Rawlin

Attorneys for DISH Wireless L.L.C.

Robbin Russell
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
robbin.russell@puco.ohio.gov

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

Marianne Townsend
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
marianne.townsend@puco.ohio.gov

John Jones
Office of the Ohio Attorney General
30 East Broad Street, 16th Floor
Columbus, OH 43215
john.jones@OhioAGO.gov



EXHIBIT A

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 440-890
Block(s): 1xxx
Effective Date: 5/17/2022
Expiration Date: 11/17/2022
Extension Request: 6 months

Reason for Extension:

____ Construction / Permitting Delays
____ Software Issues
____ Supplier shortages
____x____ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

____ PUC notified NANPA of approved extension
____ Written approval from PUC received by DISH Network
____ Written confirmation from NANPA received by DISH



EXHIBIT B

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 216-460
Block(s): 5xxx
Effective Date: 5/17/2022
Expiration Date: 11/17/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT C

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 937-794
Block(s): 1xxx
Effective Date: 5/21/2022
Expiration Date: 11/21/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT D

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 937-717
Block(s): 7xxx
Effective Date: 5/21/2022
Expiration Date: 11/21/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT E

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 937-761
Block(s): 0xxx
Effective Date: 7/31/2022
Expiration Date: 1/31/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT F

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 234-322
Block(s): 9xxx
Effective Date: 5/26/2022
Expiration Date: 11/26/2022
Extension Request: 6 months

Reason for Extension:

____ Construction / Permitting Delays
____ Software Issues
____ Supplier shortages
___x___ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

___ PUC notified NANPA of approved extension
___ Written approval from PUC received by DISH Network
___ Written confirmation from NANPA received by DISH



EXHIBIT G

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 567-443
Block(s): 9xxx
Effective Date: 5/30/2022
Expiration Date: 11/30/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT H

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 330-765
Block(s): 8xxx
Effective Date: 5/30/2022
Expiration Date: 11/30/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT I

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 234-346
Block(s): 8xxx
Effective Date: 5/31/2022
Expiration Date: 11/30/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT J

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 234-808
Block(s): 1xxx
Effective Date: 6/1/2022
Expiration Date: 12/1/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH



EXHIBIT K

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 740-899
Block(s): 1xxx
Effective Date: 6/1/2022
Expiration Date: 12/1/2022
Extension Request: 6 months

Reason for Extension:

____ Construction / Permitting Delays
____ Software Issues
____ Supplier shortages
____x____ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

____ PUC notified NANPA of approved extension
____ Written approval from PUC received by DISH Network
____ Written confirmation from NANPA received by DISH



EXHIBIT L

To: Robbin Russell Robbin.Russell@puco.ohio.gov
Public Utilities Commission of Ohio
CC: Kevin Gatchell kgatchell@nanpa.com
NANPA Pooling Administration

Re: Part 4 Extension Request for DISH Wireless L.L.C. (CMRS No. 202)

Date: 12/29/2022

Dear Ms. Russell,

As a new Mobile Network Operator, DISH Wireless L.L.C. ("DISH") has committed to provide 5G wireless coverage to 20% of the U.S. population by June 14, 2022 and to 70% of the U.S. population by June 14, 2023. The work to build out a greenfield 5G network is extensive and will require activation of telephone numbers in a large number of rate centers. Due to unanticipated delays, DISH is unable to meet the NANPA Part 4 requirement to confirm Code in Service within six months of the original effective date. We are requesting the following extension per Section 11.1.4 and 11.2.3 of the TBCOCAG.

OCN: 490J – DISH Wireless L.L.C.
Code: 234-338
Block(s): 8xxx
Effective Date: 6/6/2022
Expiration Date: 12/6/2022
Extension Request: 6 months

Reason for Extension:

☐ Construction / Permitting Delays
☐ Software Issues
☐ Supplier shortages
☒ Other (explain) Onboarding customers is taking longer than expected but new customers are being added daily.

Please confirm in writing if this extension is approved and provide confirmation of the approval to NANPA.

For DISH use only

☐ PUC notified NANPA of approved extension
☐ Written approval from PUC received by DISH Network
☐ Written confirmation from NANPA received by DISH

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

1/5/2023 10:52:16 PM

in

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

Summary: Motion Motion for Extension of the Deadline for Placing New Numbers into Service and Memorandum in Support and Exhibits electronically filed by Mr. Dustin B Rawlin on behalf of DISH Wireless L.L.C.