

**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)

**AMENDED 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): ASHTABULA (440-825-8); MARYSVILLE (937-819-5); MIDDLEFIELD (440-705-9); MILLERSPORT (220-500-4); OSTRANDER (740-766-8); SEDALIA (740-874-0); SIDNEY (326-206-1); SMITHVILLE (234-477-0); and URBANIA (937-772-0).¹ For the reasons discussed in the Memorandum in Support, DISH requests a four-month extension from today to November 8, 2023, as indicated in DISH's accompanying memorandum.

Dated: July 19, 2023

Respectfully submitted,

/s/ Dustin B. Rawlin

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¹ Since DISH's motion for an extension was filed on July 8, 2023, the CHESTERVILLE (567-378-9) and RICHFIELD (234-346-8) blocks have been activated and assignment of numbers has commenced. DISH's request for a third extension for these numbering resources is now moot.

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In the Matter of the Commission’s Consideration)
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**MEMORANDUM OF DISH WIRELESS L.L.C. IN SUPPORT OF ITS AMENDED
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): ASHTABULA (440-825-8); MARYSVILLE (937-819-5); MIDDLEFIELD (440-705-9); MILLERSPORT (220-500-4); OSTRANDER (740-766-8); SEDALIA (740-874-0); SIDNEY (326-206-1); SMITHVILLE (234-477-0); and URBANIA (937-772-0). The North American Number Plan Administrator (“NANPA”) granted to DISH blocks of numbers in the above-listed rate centers. DISH’s due dates for submitting its NANPA part 4 form are outlined below:²

Block of numbers	Rate Center	LERG effective date	NANPA part 4 form due date	Requested extension date
440-825-8	Ashtabula	09/01/2022	6/1/2023	11/8/2023
937-819-5	Marysville	09/17/2022	6/17/2023	11/8/2023
440-705-9	Middlefield	09/01/2022	6/1/2023	11/8/2023
220-500-4	Millersport	12/16/2022	6/14/2023	11/8/2023
740-766-8	Ostrander	12/16/2022	6/14/2023	11/8/2023

² DISH previously requested extensions of time to submit its NANPA part 4 form for the following rate centers: Ashtabula, Chesterville, Marysville, Middlefield, and Richfield. This is DISH’s first extension request for the following rate centers: Millersport, Ostrander, Sedalia, Sidney, Smithville, and Urbania. The Chesterville and Richfield blocks have been activated and assignment of numbers has commenced and DISH is no longer requesting a third extension for Chesterville and Richfield, as it is moot.

Block of numbers	Rate Center	LERG effective date	NANPA part 4 form due date	Requested extension date
740-874-0	Sedalia	12/16/2022	6/14/2023	11/8/2023
326-206-1	Sidney	12/20/2022	6/18/2023	11/8/2023
234-477-0	Smithville	12/20/2022	6/18/2023	11/8/2023
937-772-0	Urbana	12/15/2022	12/15/2022	11/8/2023

Onboarding of DISH customers is taking longer than expected, but new customers are being added daily. These rates centers are in DISH’s Cleveland market, which just launched on January 24, 2023, and DISH’s Columbus market, which just launched on March 29, 2023, under the Boost Infinite product; DISH could acquire a customer in these rate centers at any time. Since DISH’s last motion for an extension of time in April, DISH fulfilled one of its enforceable commitments to the Federal Communications Commission (“FCC”) by completing construction of a greenfield telecommunications infrastructure that provides 5G wireless coverage to 70% of the U.S. population. Although there were some unanticipated delays in achieving this monumental task—which prevented DISH from obtaining subscribers—DISH achieved this milestone on June 14, 2023. It also recently onboarded a third-party corporate vendor, Peerless Network³, who requires use of the blocks of numbers outlined above.

To provide DISH’s corporate vendor sufficient time to utilize the blocks of numbers and for DISH to activate service, DISH respectfully requests a four-month extension of the part 4 submission date to November 8, 2023, as indicated above. Additionally, the identified rate centers now have coverage, and requiring DISH to return these number blocks would preclude DISH from providing telephone numbers to customers for at least 33 days during the re-ordering interval. This would not only prejudice DISH, but also impact its customers.

³ See <https://www.peerlessnetwork.com/>

DISH further states that it is initiating the process to return several blocks of numbers. Although DISH has worked diligently to build out a greenfield 5G network and onboard corporate vendors to utilize its blocks of numbers, DISH understands the PUCO's deadlines and priorities, and so will return the following number blocks next week:

Rate Center Abbreviation	NPA/NXX(A)	1k Block(s)
AMANDA	220-213	6
ANDOVER	440-689	1
BIGPRAIRIE	234-413	8
BOWERSTON	740-316	8
BREMEN	740-640	8
BUCYRUS	567-409	6
CHRISTISBG	937-857	1
CRESTLINE	567-443	9
DALTON	234-683	0
DELLROY	330-681	9
FREDECKSBG	234-399	0
HAYESVILLE	419-922	3
HUDSON	234-344-A	8
LANCASTER	220-216	3
LEROY	440-254	8
LISBON	234-335	0
LOUDONVL	567-223	8
MARION	220-221	6
MINERAL CY	234-768	0
MT VERNON	740-627	8
NEWWATERFD	234-588	1
NORWALK	419-744	8
ORWELL	440-648	9
PLEASANTHL	326-205-A	0
ROOTSTOWN	234-326	1
SOMERSET	740-900	5
SUGARCREEK	234-701	9
WAKEMAN	440-215	9
WILLIAMSPT	220-677	0

Rate Center Abbreviation	NPA/NXX(A)	1k Block(s)
WINONA	234-688	0
WMANCHESTR	937-757	8

Given DISH's good faith and diligent actions to complete its greenfield 5G network and onboard a corporate vendor to expedite obtaining subscribers, and its stated intent to return various number blocks, DISH respectfully requests that the Commission grant its motion for extension.

Date: July 19, 2023

Respectfully submitted,

/s/ Dustin B. Rawlin

Dustin B. Rawlin (Ohio Bar 0072870)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing has been served this 19th day of July, 2023 by electronic mail on the parties shown below.

/s/ *Dustin B. Rawlin*

Dustin Rawlin

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Summary: Motion (Amended) of DISH Wireless L.L.C. for an Extension of the
Deadline for Placing New Numbers into Service electronically filed by Mr. Dustin B.
Rawlin on behalf of DISH Wireless L.L.C..