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RECEIVED

JAN 17 2013

PUBLIC SERVICE
COMMISSION

January 14, 2013


Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Re: BellSouth Telecommunications, Inc.'s, d/b/a AT&T Kentucky,
Petition Requesting the Commission's Intervention in NANPA
NXX Code Assignments (Louisville Rate Center, Area Code 502)

Dear Mr. Derouen:

Enclosed are the original and ten (10) copies of BellSouth Telecommunications, LLC, d/b/a AT&T Kentucky's Petition for Review of NXX Code Denial in the Louisville Rate Center. Thank you for your consideration of this request.

Sincerely,



Mary K. Keyer

Enclosures

1053764

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JAN 16 2013

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION PUBLIC SERVICE
COMMISSION

In the Matter of:

BELLSOUTH TELECOMMUNICATIONS, LLC)
D/B/A AT&T KENTUCKY'S PETITION)
REQUESTING THE COMMISSION'S) CASE NO. _____
INTERVENTION IN NANPA NXX CODE)
ASSIGNMENTS (NPA 502))

BELLSOUTH TELECOMMUNICATIONS, LLC
d/b/a AT&T KENTUCKY'S PETITION FOR REVIEW
OF NXX CODE DENIAL IN THE LOUISVILLE RATE CENTER

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky ("AT&T Kentucky"), through its undersigned counsel, pursuant to the rules adopted by the Federal Communications Commission ("FCC") for challenging determinations of the North American Numbering Plan Administrator ("NANPA"), petitions the Kentucky Public Service Commission ("Commission") for review of NANPA's denial of AT&T Kentucky's application for use of central office numbering resources in the 502 area code. In support of its petition, AT&T Kentucky states:

1. AT&T Kentucky is a telecommunications utility regulated by the Commission. It provides, among other services, intraLATA local exchange telecommunications services in the Commonwealth of Kentucky.
2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See 47 C.F.R. Sec. 52.13 (a), (b).

3. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104"). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of telephone numbers and to avoid further exhaustion of numbers under the NANP.
4. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier's need for numbering resources by requiring carriers to report rate-center-based utilization data to NANPA, rather than switch-specific utilization data. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will exhaust within six (6) months of the application. The FCC reaffirmed this requirement in two subsequent orders. FCC 00-429 at para. 29 (rel. Dec. 29, 2000); FCC 01-362 at para. 48-49 (rel. Dec. 28, 2001).
5. The shift to a rate center basis for determining the need for new numbering resources was intended to "more accurately reflect how numbering resources are assigned" and to allow carriers "to obtain numbering resources in response to specific customer demands." FCC 00-104, para. 105.
6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also require carriers to meet a rate center utilization threshold of seventy-five percent (75%) in order to receive

additional numbering resources in a given rate center. FCC 00-429 at para. 22; FCC 01-362, para. 50-52. Based on the FCC's orders, carriers must meet both the MTE requirement and the utilization threshold requirement on a rate center basis in order to obtain additional numbering resources. Id.

7. On January 9, 2013, AT&T Kentucky submitted a Central Office Code (NXX) Assignment Request and CO Code Assignment/Months-to-Exhaust Certification Request Worksheet to NANPA for the assignment of one block of ten thousand numbers needed to meet the numbering demand for 10,000 consecutive numbers for the Baptist Hospital East in Louisville, Kentucky. The application is attached hereto as Attachment 1.
8. AT&T Kentucky completed the application in accordance with the Industry Numbering Committee's Guidelines and filled out the necessary Months-To-Exhaust Certification Worksheets as required.
9. The code assignment request was for an NXX in the 502 NPA to meet Baptist Hospital East's request for sequential numbers. AT&T Kentucky, however, did not have the sufficient number of resources available within its inventory in the Louisville rate center and was unable to meet the customer's specific request for numbering resources. At the time of the filing of the code request, the Louisville rate center had a MTE of 169 and a utilization of 60.92%. AT&T Kentucky submitted this code request because the Louisville switch that serves the customer does not have a block of sequential numbers large enough to meet the customer's needs.

On January 9, 2013, NANPA's Central Office Code Administration denied AT&T Kentucky's code request on the grounds that AT&T Kentucky had not met the rate-center-based months-to-exhaust and utilization criteria now set forth in the Central Office (NXX) Guidelines. NANPA denied AT&T Kentucky's code requests despite the fact that AT&T Kentucky does not have adequate numbering resources needed to satisfy its customer's demands in the above-referenced switch. NANPA's response is on the last two pages of Attachment 1.

10. AT&T Kentucky's inability to provide this important customer – Baptist Hospital East - with the requested numbers prevents AT&T Kentucky from providing the quality of service this customer desires, needs, and expects. If AT&T Kentucky is not assigned the code needed to meet the customer's request, AT&T Kentucky will be unable to provide the telecommunications services requested by the customer.¹ NANPA's refusal to grant numbering resources sufficient to meet Baptist Hospital East's need is inconsistent with the FCC's position that "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." FCC 00-429 at para.61.
11. Both the FCC's rules and the Central Office Code (NXX) Guidelines provide that state regulatory authorities have the power and authority to

¹ AT&T Kentucky employs a number administration technique called "sequential numbering" in order to preserve the largest blocks of consecutive numbers for as long as possible. The lack of consecutive numbers in the switches referred to above is the consequence of a high level of utilization, not any failure on AT&T Kentucky's part to conserve blocks of consecutive numbers.

review NANPA's decision to deny a request for numbering resources. See FCC 01-362, Appendix A, Final Rules, para. 52.15(g)(4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission.") FCC 01-362 at para. 61-66; Central Office Code (NXX) Guidelines para. 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

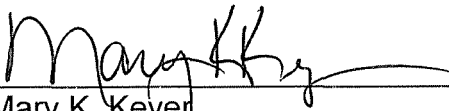
12. Prior to the FCC's orders and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, NANPA looks at the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." FCC 01-362, para. 64. In addition, the FCC has ruled that, "States . . . may grant requests for customers seeking contiguous blocks of numbers." Id.

13. AT&T Kentucky requests that the Commission reverse NANPA's decision to withhold numbering resources from AT&T Kentucky.
14. This Commission, as well as the Commissions in Alabama, Florida, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee, has previously addressed similar situations and ordered NANPA to provide AT&T Kentucky with the numbering resources, even though AT&T Kentucky was unable to satisfy the requirements.

WHEREFORE, AT&T Kentucky requests that the Commission:

1. Reverse the decision of NANPA to deny AT&T Kentucky's requests for additional numbering resources,
2. Direct NANPA to provide the requested ten thousand block of numbers for the switch identified herein, and
3. Grant the requested relief as soon as practicable.

Respectfully submitted this 14th day of January, 2013.




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(502) 582-8219
mary.keyer@att.com

COUNSEL FOR BELL SOUTH
TELECOMMUNICATIONS, LLC
d/b/a AT&T KENTUCKY



















ATTACHMENT 1

Pooling Administration System

 rw0052@att.com (SP)

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Time : 01/09/2013 12:34:11 PM EST

-   Individual Block Requests
-   CO/NXX Code Requests
-   Withdraw Pending Requests
-   Confirm Resources In Service
-   Donate Blocks
-   Submit Forecast
-   Search Forms
-   Reports
-   User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

Your Utilization calculates to 60.922%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver

neustar

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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.

Request Expedited Treatment? Yes _____ No X _____

1.4 a) Type of company/entity requesting the code: Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

e) Type of change (Mark all that apply)

OCN-Intra-company ¹¹ Switching Id Rate Center
Tandem Homing CLLI

OCN-Inter-company ¹² Effective Date LATA
Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

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 an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application. ¹⁴

Sr.

Rena Butticaz

Signature of Code Applicant

Specialist 01/09/2013

Title Date

- ¹ Identify type and reason for change(s) in Section 1.4(e).
- ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- ³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
- ⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code 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 Telcordia™ Routing Administration (TRA) on 732-699-6700.
- ⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹ 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 code. Such arrangements are outside the scope of these guidelines.
- ¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date
- ¹¹ Select if you are the current Code Holder
- ¹² Select if you are not the current Code Holder
- ¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- ¹⁴ An incomplete form may result in delays in processing this request.

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Pooling Administration System










 rw0052@att.com (SP)

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TBPAG Attachment 1 - March 19, 2007

-  Individual Block Requests
-  CO/NXX Code Requests
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

Thousands-Block Application Form - Part 1A

Tracking Number: **502-LOUISVILLE-KY-606084**
Full NXX: Dedicated Customer

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**
 Headquarters Address: **500 Broad St SE**
 City, State, Zip: **Gainesville, GA, 30501**
 Contact Name: **Rena Butticaz**
 Contact Address: **500 Broad St SE**
 City, State, Zip: **Gainesville , GA , 30501**
 Phone: **770-945-9630** FAX: **770-945-9630** E-mail: **rw0052@att.com**

Pooling Administrator: ⁱⁱ

Contact Name: **Genevieve Bettiga**
 Contact Address: **1800 Sutter St**
 City, State, Zip: **Concord , CA, 94520**
 Phone: **925-363-7652** FAX: **925-363-7683**
 E-mail: **genevieve.bettiga@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: 502 LATA: 462 OCN: ^{iv} 9419 Parent Company's OCN 9419

Number of Thousands-Blocks Requested : 10

Switching Identification(Switch Entity/POI) : ^v
LSVLKYSMDS0

City or Wire Center Name : _____ Rate Center: ^{vi}
LOUISVILLE

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 01/09/2013 Requested Block Effective Date: ^{viii}
03/16/2013

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.

Request Expedited Treatment? (See Section 8 6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
_____(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____
- 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 ^{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 an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Rena Butticz

Sr. Specialist 01/09/2013

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 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 section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider 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 should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth 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 must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new 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.

Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code 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).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will 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 NPA-NXX of the LRN to be associated with this block (s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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




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May 16, 2008

-  Individual Block Requests
-  CO/NXX Code Requests
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

Appendix 3
MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **502-LOUISVILLE-KY-606084**
Date: **01/09/2013** OCN: **9419** Company Name: **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**

Rate Center: **LOUISVILLE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: **Rena Buttica** Signature: **Rena Buttica**

Title **Sr. Specialist** Telephone No.: **770-945-9630** FAX No.: **770-945-9630**

E-mail: **rw0052@att.com**

A. Available Numbers: **291653**

B. Assigned Numbers: **559178**

C. Total Numbering Resources **917857**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ² **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 ³	<u>83</u>	<u>21</u>	<u>41</u>	<u>47</u>	<u>87</u>	<u>41</u>						
--	------------------	------------------	------------------	------------------	------------------	------------------	--	--	--	--	--	--

F. Forecast - Next 12 months ⁴	<u>53</u>	<u>10053</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>	<u>53</u>
---	------------------	---------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) **1719.667**

H. Months to Exhaust⁵ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	291653	169.599

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = 60.922$

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes 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).

³Net change in TNs 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

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii))

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System

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Attachment 3

- Individual Block Requests
- CO/NXX Code Requests
- Withdraw Pending Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

November 21, 2003
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 502-LOUISVILLE-KY-606084

Date of Application: 01/09/2013 Effective Date: _____
Date of Receipt: 01/09/2013 Date of Response: 01/09/2013

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL
(Telcordia TM LERG TM Routing Guide) OCN: 9419
Parent Company OCN: 9419

NPAC SOA SPID: _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-7652

Signature of Pooling Administrator

Genevieve Bettiga Fax: 925-363-7683

Name (print)

Email: genevieve.bettiga@neustar.biz

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 : _____

Switch Identification(Switch Entity/POI): 1 LSVLKYSMDS0
Rate Center: LOUISVILLE
Rate Center Sub Zone: _____

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 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

— Request withdrawn.

— Explanation:

— Assignment activity suspended by the administrator.

— Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc)

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BAPTIST HEALTHCARE SYSTEM

4007 Kresge Way
Louisville, KY 40207

502-896-5000
502-896-5020 fax


To Whom It May Concern,

Baptist Hospital East is rapidly expanding, adding new facilities, acquisitions and services, requiring expansion of our DID phone number pool. Our current DID number pool has been exhausted of all spare numbers, and we constantly encounter issues of misdialed numbers due to confusion of having three different exchanges in our DID number pool. The greatest percentage of complaints involves fax calls to residential and business voice lines.

We are requesting to add 10,000 new sequential numbers in a common exchange to be served out of the 502/896 Central Office in Louisville, KY. This will allow us to convert our existing DID numbers to a uniform exchange, and provide sufficient spare numbers for future expansions while maintaining a common exchange across all our DID numbers.

This will satisfy our needs for new numbers and allow us to convert all our existing DID numbers to a common exchange to eliminate confusion. We would eventually release our current DID numbers, except for the main listed number and any critical services numbers such as crisis lines, emergency department, etc.

Thank you in advance for considering our request.



Rick Becker – Corporate Telecom Manager