



PAETEC

January 5, 2011

Mr. Eric Bowman
Kentucky Public Service Commission
211 Sower Blvd., P.O. Box 615
Frankfort, KY 40602-0615

Re: LRN NPA-NXX for LSVNKYPIDSA Switch – ELIZABHTN Rate Center

Dear Mr. Bowman:

US LEC d/b/a PAETEC Communications Inc. (US LEC), seeks intervention of the Commission in securing an NPA-NXX assignment for LRN purposes. US LEC, on behalf of US LEC of Tennessee Inc., recently requested a new NPA-NXX for the LSVNKYPIDSA rate center from Neustar. The request was for an NPA-NXX to support an existing US LEC switch, LSVNKYPIDSA at 9780 Ormsby Station Road, Louisville. In the request, US LEC notified Neustar that US LEC would retain block 1 from the NXX to support the LRN needs and provide a small group of numbers for customers and return the remaining blocks to the pool for other local carriers to use.

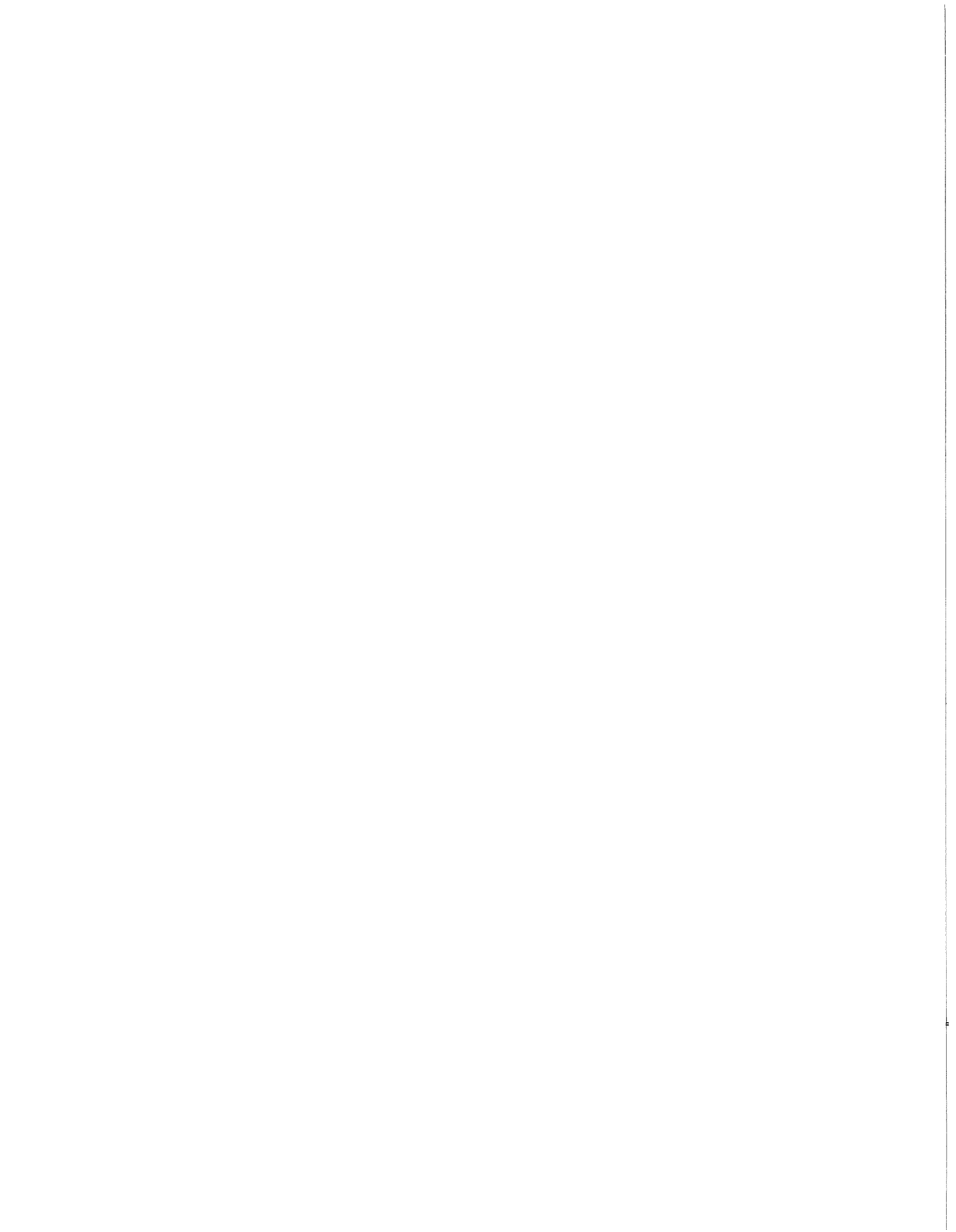
In its request, US LEC notified Neustar that the request was for an NXX to support an LRN (see explanation on page 2 of the Elizabhtn KY LRN Denial. In its response, Neustar stated "You do not meet MTE and/or Utilization requirements, therefore this request for a new code is denied."

US LEC requests the Commission intervene on its behalf to secure an NXX in the 270 NPA from Neustar. In accordance with ATIS Guidelines IN 980713-021, LRN Assignment Practice, a company can request the Commission to override the utilization requirement in instances of a need for an NXX for LRN purposes in an existing switch, but with need for connection to another providers' Tandem (EZTWKYXA05T), in order to provide specific services that are not available in our 5E switch, at this time. Enclosed are copies of the pages containing US LEC's request and Neustar's response.

If you have additional questions, please contact me at (704) 319-6093 or sumer.smith@paetec.com.

Sincerely,

Sumer Smith
Regulatory Coordinator
Enclosure



McKoy, Beatrice

From: genevieve.bettiga@neustar.biz
Sent: Saturday, December 11, 2010 5:10 PM
To: McKoy, Beatrice
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 270-ELIZABHTN-KY-404409

Pooling Administration System

Dated 11-December-2010

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 270-ELIZABHTN-KY-404409

Date of Application: 12/11/2010 Effective Date: _____
Date of Receipt: 12/11/2010 Date of Response: 12/11/2010

Service Provider Name: US LEC OF TN - KY
(Telcordia™ LERG™
Routing Guide) OCN: 3495

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 LSVNKYPIDSA

Rate Center: ELIZABHTN

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.)



<h1>Pooling Administration System</h1>	
beatrice.mckoy@paetec.com (SP) • Sign Out	
Time : 12/11/2010 05:08:54 PM EST	
<ul style="list-style-type: none">Individual Block RequestsCO/NXX Code Requests<ul style="list-style-type: none">New Code RequestCode ModificationCode DisconnectCopy Code RequestWithdraw Pending RequestsConfirm Resources In ServiceDonate BlocksSubmit Forecast<ul style="list-style-type: none">Create/Modify ForecastSearch Forms<ul style="list-style-type: none">View FormList FormsReportsUser Profile	<h2>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</h2> <p>Your Utilization calculates to 63.150%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</p> <p style="text-align: center;">Select One Option and Submit</p> <p style="text-align: center;"><input type="radio"/> Return to the Months To Exhaust Form <input checked="" type="radio"/> Need to request a State Waiver <input type="radio"/> Received a State Waiver</p> <hr/> <p style="text-align: center;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>
<p>neustar Question? Email us © 1997-2012 Neustar, Inc. Legal Notice</p>	

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking Number: **270-ELIZABHTN-KY-404409**

Full NXX: LRN

Type of Application: New Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **US LEC OF TN - KY**

Headquarters Address: **600 Willowbrook Office Park**

City, State, Zip: **Fairport ,NY ,14450**

Contact Name: **Beatrice McKoy**

Contact Address: **6801 Morrison Boulevard**

City,State,Zip: **Charlotte, NC, 28211**

Phone: **704-319-1351** FAX: **E-mail: beatrice.mckoy@paetec.com**

Code Administrator: ²

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5381** FAX: **571-434-5502**

1.2 NPA: **270** NXX: ³ **3495** LATA: **462** OCN: ⁴ **8354**
Parent Company's OCN(s)

Switching Identification(Switch Entity/POI) ⁵
LSVNKYPIDSA

Locality/City/Wire Center: Rate Center: ⁶
ELIZABHTN

Homing Tandem Operating Co: Tandem Homing
⁷ **WINDSTREAM** CLLI
KENTUCKY EAST ⁸ **:EZTWKYXA05T**

1.3 Dates: Date of Request Effective Date: ^{9 10}
Application: 12/11/2010 02/15/2011

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: CAP OR CLEC
(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:

LRN needed for G9 switch to Windstream tandem

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

<u>Beatrice McKoy</u>	<u>Code Administrator</u>	<u>12/11/2010</u>
Signature of Code Applicant	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 TM 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 TM COMMON LANGUAGE CLLI TM 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 TM 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.

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 270-ELIZABHTN-KY-404409
Full NXX: LRN

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: US LEC OF TN - KY
Headquarters Address: 600 Willowbrook Office Park
City, State, Zip: Fairport, NY, 14450
Contact Name: Beatrice McKoy
Contact Address: 6801 Morrison Boulevard
City,State,Zip: Charlotte , NC , 28211
Phone: 704-319-1351 FAX: E-mail: beatrice.mckoy@paetec.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 X

NPA: 270 LATA: 462 OCN: ^{iv}3495 Parent Company's OCN 8354

Number of Thousands-Blocks Requested : 1

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

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

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 12/11/2010 Requested Block Effective Date: ^{viii} 02/15/2011

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 : 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) _____
- 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) 270-xxx-1,

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: LRN needed for G9 switch to Windstream tandem

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.

Beatrice McKoy

Signature of Block Applicant

Code

Administrator

12/11/2010

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 TelcordiaTM LERGTM 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 TelcordiaTM 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. They 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.

Appendix 3

May 16, 2008

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

Tracking Number: 270-ELIZABHTN-KY-404409

Date: 12/11/2010

OCN:3495

Company Name:US LEC OF TN - KY

Rate Center: ELIZABHTN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):270-505-1 & 270-506-1

Name of Block Applicant:Beatrice McKoy

Signature: Beatrice McKoy

Title:Code Administrator

Telephone No.: 704-319-1351

FAX No.:

E-mail: beatrice.mckoy@paetec.com

A. Available Numbers:527

B. Assigned Numbers: 1263

C. Total Numbering Resources:2000

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
months³

<u>0</u>	<u>0</u>	<u>4</u>	<u>0</u>	<u>0</u>	<u>0</u>
----------	----------	----------	----------	----------	----------

F. Forecast
 - Next 12 months⁴ 50 0 0 0 0 0 20 0 0 20 0 10

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 8.333

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	527	63.243

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 =$
63.15

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))