

WATERS LAW GROUP, PLLC

Robert R. Waters
KY, WV, USPTO
Brian W. Foxworthy
IN, USPTO
Jason A. Poling
WV
Cheryl R. Winn
KY
D. Matthew Kannady
KY, USPTO
Steven M. Wright
WV
James R. Mills
WV
John M. Bundy
KY, IN
Phoebe D. Riner
KY, USPTO

*Intellectual Property Law
Business and Personal Litigation*

www.waterslawgroup.com

Kentucky Office
12802 Townepark Way
Suite 200
Louisville, KY 40243
Tele: (502) 425-2424
Fax: (502) 425-9724

West Virginia Office
633 Seventh Street
Huntington, WV 25701
Tele: (304) 522-6658
Fax: (304) 522-7722

RECEIVED

MAR 7 2016

Public Service
Commission

March 4, 2016

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

Case No. 2016-00113

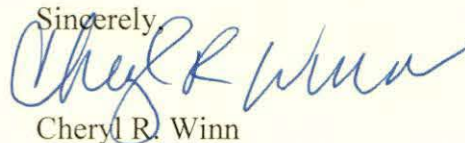
RE: BellSouth's Petition for Review of NXX Code Denial in the Georgetown Rate Center

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 Georgetown Rate Center.

I have included an extra copy along with a postage-prepaid envelope. Please file-stamp and return the extra copy to me. If you have any questions or need further information, please contact me at the Louisville office listed above. Thank you for your assistance and attention to this matter.

Sincerely,



Cheryl R. Winn

Enclosures

RECEIVED

MAR 7 2016

Public Service
Commission

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BellSouth Telecommunications, LLC)
d/b/a AT&T Kentucky's Petition Requesting) Case No. 2016-00113
the Commission's 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 GEORGETOWN 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 February 17, 2016, 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 two blocks of a thousand numbers needed to meet the numbering demand for 2,000 consecutive numbers for Toyota Motor in Georgetown, 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 Toyota Motor's request for sequential numbers. AT&T Kentucky, however, did not have the sufficient number of resources available within its inventory in the Georgetown 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 Georgetown rate center had a MTE of 29 (Block 1) and MTE of 31 (Block 2) and a utilization of 57.6%. AT&T Kentucky submitted this code request because the Georgetown switch that serves the customer does not have two blocks of sequential numbers large enough to meet the customer's needs. On February 17, 2016, 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 six pages of Attachment 1.

10. AT&T Kentucky's inability to provide this important customer – Toyota Motor - 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 Toyota'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 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").

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

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,

referred to above is the consequence of a high level of utilization, not any failure on AT&T Kentucky's part to

2. Direct NANPA to provide the requested two blocks of a thousand numbers for the switch identified herein, and
3. Grant the requested relief as soon as practicable.

Respectfully submitted this 4th day of March, 2016.

Respectfully submitted,



Cheryl R. Winn

Waters Law Group, PLLC

12802 Townepark Way, Suite 200

Louisville, KY 40243

Telephone: (502) 425-2424

Facsimile: (502) 425-9724

crwinn@waterslawgroup.com

conserve blocks of consecutive numbers.

ATTACHMENT 1

Pooling Administration System		• Sign Out
<input type="text" value="x"/> rw0052@att.com (SP)	Time : 02/17/2016 05:55:20 PM EST	
	<p>Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)¹</p> <p>Your Utilization calculates to 57.637%. The FCC requires a utilization of 75%. You have requested more blocks than you will exhaust in six months.</p> <p>Select One Option and Submit</p> <ul style="list-style-type: none"><input checked="" type="radio"/> Return to the Months To Exhaust Form<input type="radio"/> Need to request a State Waiver<input type="radio"/> Received a State Waiver<input type="radio"/> Over-Contaminated Block Exception <p style="text-align: center;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>	
<input type="text" value="x"/>	© 2014 NeuStar, Inc. Legal Notice	Last updated: February 17, 2016.

ATTACHMENT 1

Pooling Administration System		• Sign Out
x	rw0052@att.com (SP)	Time : 02/17/2016 05:55:20 PM EST
<p>Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)¹</p> <p>Your Utilization calculates to 57.637%. The FCC requires a utilization of 75%. You have requested more blocks than you will exhaust in six months.</p> <p>Select One Option and Submit</p> <ul style="list-style-type: none"><input checked="" type="radio"/> Return to the Months To Exhaust Form<input type="radio"/> Need to request a State Waiver<input type="radio"/> Received a State Waiver<input type="radio"/> Over-Contaminated Block Exception <p style="text-align: center;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>		
x	© 2014 NeuStar, Inc. Legal Notice	Last updated: February 17, 2016.

Pooling Administration System

• Sign Out

x rw0052@att.com (SP)

Time : 02/17/2016 05:56:30 PM EST

[Printable Version](#)

TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking Number: **502-GEORGETOWN-KY-900765**
Individual Block Request

Type of Application: New Change ⁱ 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 Buttica**

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: 466 OCN: ^{iv} 9419 Parent Company's OCN 9419

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI) : ^v GRTWKYMADS0

Rate Center: ^{vi} GEORGETOWN

1.3 Dates:

Date of Application: ^{vii} 02/17/2016 Requested Block Effective Date: ^{viii} 03/19/2016

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

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) _____

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 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 _____ or 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 _____ or No _____

d) Has this block been protected from further assignment: Yes _____ or 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 Buttica

Sr. Specialist

02/17/2016

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 iconectivTM 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 iconectiv Telecom 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 CLLITM 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.

Footnotes:

- 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 CLLITM 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 PSTN 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} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

.....

Pooling Administration System

• Sign Out



rw0052@att.com (SP)

Time : 02/17/2016 05:56:50 PM EST

[Printable Version](#)

Appendix 3

January 12, 2015

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

Tracking Number: **502-GEORGETOWN-KY-900765**

Date: **Wednesday,
February 17, 2016**

OCN: **9419**

Company Name: **BELLSOUTH TELECOMM INC
DBA SOUTH CENTRAL BELL TEL**

Rate Center: **GEORGETOWN**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **502 570 A 502 863 A 502 867 A
502 868 A**

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

Title: **Sr. Specialist**

Telephone No.: **770-945-9630-**

FAX No.: **770-945-**

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

A. Available Numbers: **13599**

B. Assigned Numbers: **18502**

C. Total Numbering Resources: **32101**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³: **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 months⁴

<u>1023</u>	<u>-21</u>	<u>-28</u>	<u>-22</u>	<u>-12</u>	<u>-95</u>							
--------------------	-------------------	-------------------	-------------------	-------------------	-------------------	--	--	--	--	--	--	--

F. Forecast - Next 12 months⁵

<u>141</u>	<u>2141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>	<u>141</u>
-------------------	--------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------	-------------------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):**474.333**

H. Months to Exhaust⁶
=

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	13599	28.67
2	14599	30.778

I. Utilization⁷
=

Assigned Numbers(B) X 100 = **57.637**

Total Numbering Resources(C)-Excluded Numbers(D)

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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

most distant month as Month #1, and Month #6 as the current month.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

[Back](#)



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 GRTWKYMADS0

Rate Center: GEORGETOWN

Form Complete, request denied.

Explanation:
DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies,Inc. dba iconectiv)

Back

© 2014 NeuStar, Inc. [Legal Notice](#)

Last updated: February 17,
2016.

Pooling Administration System

• Sign Out

x rw0052@att.com (SP)

Time : 02/17/2016 05:57:21 PM EST

Printable Version

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 502-GEORGETOWN-KY-900765

Date of Application: 02/17/2016 Effective Date: _____

Date of Receipt: 02/17/2016 Date of Response: 02/17/2016

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL

(iconectivTM LERGTM 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 **GRTWKYMADS0**
 Rate Center: **GEORGETOWN**

X Form Complete, request denied.

Explanation:
DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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.

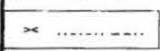
Request withdrawn.
 Explanation:

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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies,Inc. dba iconectiv)

Back



© 2014 NeuStar, Inc. [Legal Notice](#)

Last updated: February 17,
2016.



Toyota Motor Manufacturing, Kentucky, Inc.
1001 Cherry Blossom Way
Georgetown, KY 40324
502-868-2000

December 18, 2015

Toyota Motor North America will be relocating and expanding its Production Engineering Facilities from Erlanger, KY to Georgetown, KY. Toyota is in the process of building a new state of the art Production Engineering Facility on the Toyota Motor Manufacturing Kentucky (TMMK) property in Georgetown, KY. This new Facility will accommodate approximately 800 associates and will open in early 2017. There will be future expansion of this new Production Engineering Facility as well as expansion of the existing TMMK Plant.

As part of the Production Engineering expansion, Toyota is opening up a Temporary Office in Lexington, KY on March 1, 2016. This is prior to the permanent Georgetown, KY facility to allow associates go ahead and relocate and new hires to start working in the Georgetown/Lexington, KY area. When the Production Engineering Facility opens in 2017 these associates will relocate from the Temporary Office (which will be closed) and from the Erlanger, KY location.

This Lexington, KY Temporary Office will be serviced off the TMMK Georgetown phone system. The TMMK plant phone system has used up all of the AT&T DID numbers that are currently assigned. Therefore, Toyota has an immediate need for additional DID numbers.

To accommodate the immediate requirement of the Temporary Office as well as the new Production Engineering Facility and future expansion of both this new Facility and TMMK Plant – Toyota is requesting a contiguous block of 2,000 DID's to meet the immediate and long term requirements for DID phone numbers for associates and other DID number needs.

ATT currently provides TMMK with DID's 502-868-2000 thru 4999 and 502-570-6000 thru 7999. This new DID request does not have to be in those 868 & 570 NXX's (we are assuming that a contiguous block of 2,000 DID's does not exist in these NXX's).

In summary, Toyota is requesting the DID's be:

- A contiguous/consecutive block of 2,000 DID numbers in the 502 NPA (area code): 502-NXX-YYYY
- The last 4 digits of the DID's (YYYY) can start with: 1, 2, 3, 4, 5, 6, 7 (1000, 2000 ... 7000).
- The 2,000 number contiguous DID range can be anywhere from 1000 to 7999 (but start with Y000).
- These DID's are requested to be put into service by 3/1/2016 for the Temporary Office.
- These DID's are to be installed on the existing AT&T Local PRI's (with our existing DID's) at our TMMK Georgetown, KY Plant:

- 50.IPZX.507117.001
- 50.IPZX.507118.001
- 50.IPZX.507196.001
- 50.IPZX.507197.001
- 50.IPZX.507198.001

Thank you for your support in this request.

Regards,

John R. Sylvester
JOHN R. SYLVESTER
 IT SPECIALIST



JOHN SYLVESTER

SPECIALIST

INFORMATION SYSTEMS - TECHNOLOGY PLANNING, DEVELOPMENT, SUPPORT #1
TOYOTA PLANNING CENTER

Toyota Motor Engineering & Manufacturing North America, Inc.
1001 Cherry Blossom Way
Georgetown, KY 40324

Phone: 502-868-2094
Fax: 502-868-2298
Cell: 859-576-8300

john.sylvester@tma.toyota.com



jsylvest

Friday, December 18, 2015