

# 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  
Phoebe D. Riner  
KY, USPTO

*Intellectual Property Law  
Business and Personal Litigation*

[www.waterslawgroup.com](http://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

October 21, 2016

OCT 21 2016

PUBLIC SERVICE  
COMMISSION

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

Case No. 2016-00369

**RE: Teleport's Petition for Review of NXX Code Denial in the Covington Rate Center**

Dear Ms. Mathews,

Enclosed please find the original plus ten (10) copies of Teleport Communications of America, LLC's (TCAL) Petition for Review of NXX Code Denial in the Covington Rate Center.

I have included an extra copy along with a postage-prepaid envelope. Please filed-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

OCT 21 2016

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Teleport Communications of America LLC )	
Petition Requesting the Commission's )	Case No. <u>Case No. 2016-00369</u>
Intervention in NANPA NXX Code )	
Assignments (NPA 859) )	

**TELEPORT COMMUNICATIONS of AMERICA, LLC PETITION FOR REVIEW  
OF NXX CODE DENIAL IN THE COVINGTON RATE CENTER**

Teleport Communications of America, LLC (TCAL), 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 TCAL's application for use of central office numbering resources in the 859 area code.

In support of its petition, TCAL states:

1. TCAL is a telecommunications utility subject to certain regulation 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 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 October 6, 2016 TCAL submitted a Central Office Code (NXX) Assignment Request and CO Code Assignment/MTE Certification Request Worksheet to NANPA

for the assignment of 4 blocks of a thousand numbers each needed to meet the numbering demand for 3500 consecutive numbers for the Internal Revenue Service (IRS) in Covington, Kentucky. The application is attached hereto as Attachment 1.

8. TCAL completed the application in accordance with the Industry Numbering Committee's Guidelines and filled out the necessary MTE Certification Worksheets as required.
9. The code assignment request was for an NXX in the 859 NPA to meet the IRS's request for sequential numbers. TCAL, however, did not have the sufficient number of resources available within its inventory in the Covington 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 Covington rate center had a MTE of 0.511 to 5.62 months for the blocks requested and a utilization of 69.7%. TCAL submitted this request because the Covington rate center inventory does not include 4 blocks of sequential numbers to meet its customer's needs. On October 6, 2016 NANPA's Central Office Code Administration denied TCAL's code request on the grounds that TCAL had not met the MTE and utilization criteria now set forth in the Central Office (NXX) Guidelines. NANPA denied TCAL's code requests despite the fact that TCAL does not have adequate numbering resources needed to satisfy its customer's demands in the above-referenced switch. NANPA's response is in Attachment 1.
10. TCAL's inability to provide the requested numbers prevents TCAL from providing the quality of service the customer desires, needs, and expects. If TCAL is not assigned the code needed to meet the customer's request, TCAL will be unable to

provide the telecommunications services requested by the customer.<sup>1</sup> NANPA's refusal to grant numbering resources sufficient to meet the IRS'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").
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

---

<sup>1</sup> TCAL 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

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. TCAL requests that the Commission reverse NANPA’s decision to withhold numbering resources from TCAL.
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 TCAL with the numbering resources, even though TCAL was unable to satisfy the requirements.

WHEREFORE, TCAL requests that the Commission:

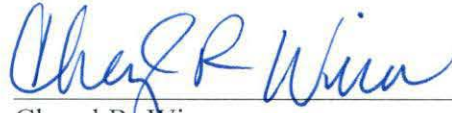
1. Reverse the decision of NANPA to deny TCAL’s requests for additional numbering resources,
2. Direct NANPA to provide the requested thousand blocks of numbers for the switch identified herein, and

---

above is the consequence of a high level of utilization, not any failure on TCAL’s part to conserve blocks of consecutive numbers.

3. Grant the requested relief as soon as practicable.

Respectfully submitted this 13th day of October, 2016.



---

Cheryl R. Winn  
Waters Law Group, PLLC  
12802 Townepark Way, Suite 200  
Louisville, KY 40243  
Telephone: (502) 425-2424  
Facsimile: (502) 425-9724  
Email: [crwinn@waterslawgroup.com](mailto:crwinn@waterslawgroup.com)

**ATTACHMENT 1**



Central Office Code Assignment Guidelines (COCAG)  
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking  
Number: **859-COVINGTON-KY-949746**

**Full NXX: Pool  
Replenishment**

Type of  
Application: ☐ New  
☒ Change<sup>1</sup>  
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity  
Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - KY**

Headquarters  
Address: **One AT&T Way**

City, State, Zip: **Bedminster, NJ, 07921**

Contact Name: **Lisa Loper**

Contact  
Address: **One AT&T Way**

City: **Bedminster** State: **NJ** ZIP: **07921**

Phone: **908-234-7622** Fax : **908-234-8044**

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

Code Administrator:<sup>2</sup>

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City: **Sterling** State: **VA** ZIP: **20166**

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

1.2 NPA: **859** NXX:<sup>3</sup> LATA: **922** OCN:<sup>4</sup>**8406**  
Parent Company's OCN(s) **7125**

Switching Identification (Switching Entity/POI)

<sup>5</sup>**CNCOOHFPDS1**

Locality/City/Wire Center:

Rate  
Center:<sup>6</sup>**COVINGTON**

Homing Tandem Operating Co.<sup>7</sup>: **ATT**

Tandem Homing

CLLI<sup>TM</sup><sup>8</sup>: **CNCNOHWS03T**1.3 DatesDate of Application: **10/06/2016**

Requested Effective

Date:<sup>9,10</sup>**12/12/2016**

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 Yes \_\_\_\_\_ No **X**

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

## 1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other):

**CAP OR CLEC**b) Type of service (e.g., Cellular - Type 2): **Wireline**c) Code Assignment Preference (Optional) **859-xxx-3, 859-xxx-4, 859-xxx-5, 859-xxx-6**

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company<sup>11</sup> ☐ Switching Id ☐ Rate Center Tandem Homing CLLI

☐ OCN-Inter-company<sup>12</sup> ☐ Effective Date ☐ LATA ☐ Extend Reservations
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: <sup>13</sup> ☐ 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/inc/incguides.asp>) as of the date of this application<sup>14</sup>.

**Lisa Loper**

Signature of Code Applicant

**Manager-Code Administration**

Title

**10/06/2016**

Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup>The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup>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 iconectiv Telcordia<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language<sup>®</sup> Location

Code (CLLI<sup>TM</sup> Code) of the applicant's switch or POI. Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>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.

<sup>10</sup>Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup>Select if you are the current Code Holder

<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>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.

<sup>14</sup>An incomplete form may result in delays in processing this request.

Tracking Number: **859-COVINGTON-KY-949746**

Thousands-Block Application Form - Part 1A  
Revised: January 4, 2016

**Full NXX: Pool  
Replenishment**

Type of Application: ☒ New ☐ Change ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - KY**  
Headquarters Address: **One AT&T Way**  
City: **Bedminster** State: **NJ** ZIP: **07921**  
Contact Name: **Lisa Loper**  
Contact Address: **One AT&T Way**  
City: **Bedminster** State: **NJ** ZIP: **07921**  
Phone: **908-234-7622** Fax: **908-234-8044**  
E-mail: **lloper@att.com**

Pooling Administrator:<sup>ii</sup>

Contact Name: **Genevieve Bettiga**  
Contact Address: **1800 Sutter St**  
City: **Concord** State: **CA** ZIP: **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<sup>iii</sup>: \_\_\_\_\_

NPA: 859 LATA: 922 OCN<sup>iv</sup>: 8406 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 4

Switch Identification (Switching Entity/POI<sup>v</sup>):  
CNCOOHFPDS1

Rate Center<sup>vi</sup>: COVINGTON

### 1.3 Dates:

Date of Application<sup>vii</sup>: 10/06/2016 Requested Effective Date<sup>viii</sup>: 12/12/2016

Requested Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No ☒

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.

### 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) \_\_\_\_\_  
859-xxx-3, 859-xxx-4, 859-xxx-5, 859-xxx-6
- 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 ☒ 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<sup>ix</sup> ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company<sup>x</sup> ☐ 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 ([www.atis.org/inc](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Lisa Loper**

**Manager-Code Administration**

**10/06/2016**

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 Telcordia Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide<sup>xi</sup>. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv™ Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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:

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup>A CO Code application will also need to be submitted to the PA.

<sup>iv</sup>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).



<sup>v</sup>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<sup>TM</sup> Code of the switch /POI.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

<sup>vii</sup>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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

## Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 859-COVINGTON-KY-949746Date: Thursday,  
October 6, 2016OCN: 8406Company Name: TELEPORT COMMUNICATIONS  
AMERICA, LLC - KYRate Center: COVINGTONList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: NPA NXX BLOCK ID 859 486 A  
859 486 2Name of Block Applicant: Lisa  
LoperSignature: Lisa LoperTitle: Manager-Code Administration  
908-234-8044Phone: 908-234-7622-

Fax:

E-Mail: lloper@att.comA. Available Numbers: 300B. Assigned Numbers: 697C. Total Numbering Resources: 1000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: 0List  
Excluded  
Code(s) or

Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth  
History -  
Previous 6  
months<sup>4</sup>

<u>0</u>	<u>27</u>	<u>4</u>	<u>2</u>	<u>7</u>	<u>6</u>
----------	-----------	----------	----------	----------	----------

F. Forecast  
- Next 12  
months<sup>5</sup>

<u>3500</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
-------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 587.5

H. Months  
to Exhaust<sup>6</sup>  
=

Numbers Available for Assignment to  
Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>300</b>	<b>0.511</b>
<b>2</b>	<b>1300</b>	<b>2.213</b>
<b>3</b>	<b>2300</b>	<b>3.915</b>
<b>4</b>	<b>3300</b>	<b>5.617</b>

I.  
Utilization<sup>7</sup>  
=

Assigned Numbers (B) X 100 = 69.7

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

Explanation: \_\_\_\_\_

<sup>1</sup>A 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.

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

<sup>3</sup>Quantity 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).

<sup>4</sup>Net 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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

**LOPER, LISA A**

---

**From:** genevieve.bettiga@neustar.biz  
**Sent:** Thursday, October 06, 2016 1:25 PM  
**To:** LOPER, LISA A  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** 859-COVINGTON-KY-949746 DENIED PAS - Part 3 Confirmation

## Pooling Administration System

Dated 06 October 2016

Thousands-Block Number Pooling Administration Guidelines  
(TBPAG) - Part 3

**Revised: January 4, 2016**

### **Pooling Administrator's Response/Confirmation**

Tracking Number : 859-COVINGTON-KY-949746

Date of Application: 10/06/2016 Effective Date: \_\_\_\_\_  
Date of Receipt: 10/06/2016 Date of Response: 10/06/2016

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - KY  
(LERG<sup>TM</sup> Routing Guide<sup>1</sup>) OCN: 8406  
Parent Company OCN: 7125

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 (1-1000): \_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>: \_\_\_\_\_

CNCOOHFPDS1

Rate Center: \_\_\_\_\_

COVINGTON

☒ 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 Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language<sup>®</sup> Location Code (CLLI<sup>™</sup> Code) of the switching entity/POI shown on the Part 1A form. Common Language<sup>®</sup> is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<input type="checkbox"/>	
--------------------------	--



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

October 6, 2016

Internal Revenue Service  
201 West Rivercenter Boulevard  
Covington, KY 41011-1430

AT&T TNAC,

This Letter of Intent represents a request by the Internal Revenue Service for a consecutive group of 3,500 telephone numbers for BVoIP Service. The Internal Revenue Service intends to order service in the Covington, KY rate center, pending AT&T's successful completion of the required testing. The Internal Revenue Service intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

The Internal Revenue Service is changing its current existing network configuration. We are requesting 3,500 numbers in sequential range, or as close of a range available to keep the numbers consistent with one another.

The Internal Revenue Service currently has 6,000 TNs and requires the additional 3,500 telephone numbers at 201 Rivercenter Boulevard, Covington KY. We (the Internal Revenue Service) will need all of the 3,500 telephone numbers that we are requesting. The switch CLLI code is CNCQOH220MD. The Internal Revenue Service is transitioning all telephone service to BVoIP provided by AT&T. We (the Internal Revenue Service) plan to return 6000 telephone numbers to CincinnatiBell for future re-distribution after the transition is complete.

This existing IRS location is key to the IRS, as it is a tax return processing center and call center supporting the following public facing services and functions: tax return processing, Taxpayer Assistance Center Call Center.

Sincerely,

A handwritten signature in cursive script, reading "Lynne M. Bethke".

Lynne Bethke  
Information Technology Specialist  
651-312-7602 (Desk)  
901-505-6738 (Softphone)  
651-312-7601 (fax)  
[lynne.m.bethke@irs.gov](mailto:lynne.m.bethke@irs.gov)