

WATERS LAW GROUP, PLLC

Robert R. Waters
KY, WV, USPTO
Brian W. Foxworthy
IN, USPTO
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

May 19, 2017

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

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MAY 23 2017

Public Service
Commission

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

Case No. 2017-00216

**RE: BellSouth's Petition for Review of Numbering Resources Determination in the
Louisville Rate Center (NPA 502)**

Dear Ms. Mathews,

Enclosed, please find the original plus ten (10) copies of the following documents:

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky's Petition for Review of Numbering Resources Determination in the Louisville Rate Center (NPA 502).

I have also 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

COMMONWEALTH OF KENTUCKY

MAY 23 2017

BEFORE THE PUBLIC SERVICE COMMISSION

Public Service
Commission

In the Matter of:

Petition of BellSouth Telecommunications,)	
LLC d/b/a AT&T Kentucky)	Case No. <u>2017-00216</u>
Petition Requesting the Commission's)	
Intervention in Numbering Resources)	
Determinations (NPA 502))	

**PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE LOUISVILLE RATE CENTER (NPA 502)**

AT&T Kentucky,¹ pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Kentucky Public Service Commission (“Commission”) for review of a recent denial of AT&T Kentucky’s application for use of numbering resources in the Louisville Rate Center (NPA 502). Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”² and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.³ Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ BellSouth Telecommunications, LLC d/b/a AT&T Kentucky

² See, e.g., 47 C.F.R. §52.15.

³ See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T Kentucky's customer Norton Healthcare.

In support of this Petition, AT&T Kentucky states:

1. AT&T Kentucky is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of Kentucky, including the Louisville rate center.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").⁴

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁵

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁶ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two

⁴ See 47 C.F.R. § 52.13 (a), (b).

⁵ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

⁶ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

subsequent orders.⁷ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁸ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁹

7. On or about May 18, 2017, and in order to meet its customer's express request for consecutive numbers,¹⁰ AT&T Kentucky submitted a Pooling Administration System request for the assignment of one thousands-block of numbers in the Louisville rate center to go with its customer's existing dialing plan.¹¹

⁷ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁸ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁹ *Third NRO Order* at ¶¶50-52.

¹⁰ See Exhibit A to this Petition.

¹¹ See Exhibit B to this Petition. AT&T Kentucky does not have numbering resources to meet the customer's request.

8. AT&T Kentucky's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T Kentucky filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Louisville Rate Center had an MTE of 2139.713, and a utilization of 48.98%.¹²

10. Thereafter, also on May 18, 2017, AT&T Kentucky's request was denied because AT&T Kentucky had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines.¹³ AT&T Kentucky's numbering resource requests were denied despite the fact that AT&T Kentucky does not have adequate numbering resources needed to satisfy this customer's needs in the Louisville Rate Center.

11. AT&T Kentucky's inability to provide this important customer with the requested numbering resources prevents AT&T Kentucky from providing the quality of service this customer desires, needs, and expects. If AT&T Kentucky is not assigned the numbering resources needed to meet the customer's request, AT&T Kentucky will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer 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."¹⁴

¹² *See Id.*

¹³ *See Id.*

¹⁴ *Second NRO Order* at ¶ 61.

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁵

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures 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, numbering determinations are based on 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."¹⁶ In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."¹⁷

14. AT&T Kentucky requests that the Commission reverse the decision to withhold numbering resources from AT&T Kentucky because that decision interferes with AT&T Kentucky's ability to provide telecommunication services to its customers.

¹⁵ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("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").

¹⁶ *Third NRO Order* at ¶ 64.

¹⁷ *Id.*

15. This Commission has recognized its jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T Kentucky to meet customer needs.¹⁸

WHEREFORE, AT&T Kentucky requests that the Commission:

- A. Reverse the decision to deny AT&T Kentucky's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to assign AT&T Kentucky one thousands-block of numbers in the Louisville rate center; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 19th day of May, 2017.



Cheryl R. Winn
Waters Law Group, PLLC
12802 Townepark Way, Suite 200
Louisville, KY 40243
Telephone: (502) 425-2424 Ext. 17
Facsimile: (502) 425-9724
Email: crwinn@waterslawgroup.com

¹⁸ See, e.g., Order, *In re Bellsouth Telecommunications, LLC d/b/a AT&T Kentucky Petition Requesting the Commission's Intervention in NANPA NXX Code Assignments (NPA 502)*, Case No. 2016-00113 (April 4, 2016); Order, *In re Application of Bellsouth Telecommunications, LLC d/b/a AT&T Kentucky Requesting the Commission's Intervention in NANPA NXX Code Assignments (NPA 502)*, Case No. 2013-00024 (Feb. 8, 2013).

Exhibit A



December 5, 2016

Patricia Ritacco
Service Consultant
AT&T Global Ordering
AT&T Services, Inc.
Email: PR6607@att.com

Dear Patti

Norton Healthcare would like to request an additional 1,000 DID telephone numbers for Norton Audubon Hospital (main number 502-636-7111). We are expanding the facility and do not have enough DID numbers to accommodate new offices, patient rooms and nurse stations.

We currently have the following number ranges:

502-636-7000 to 8399 and 8700-8999

502-635-3900 to 4199 and 4800-4999

And in house we use 2000-2999 and 6000-6999, **so numbers in ranges 1xxx, 4xxx (up to 4800) or 5xxx would be most useful/practical.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Spooner', written over a light blue horizontal line.

Thomas Spooner
Manager Voice and Mobile Communications
Information Systems

502-272-5927

Fax 502-272-5979

Norton Healthcare

1930 Bishops Lane, suite 1601

Louisville, KY 40218

tom.spooner@nortonhealthcare.org

Exhibit B

Pooling Administration System	
•	Sign Out
<input checked="" type="checkbox"/> rw0052@att.com (SP)	Time : 05/18/2017 02:23:26 PM EDT
	Printable Version
<p>Tracking Number: <u>502-LOUISVILLE-KY-1016489</u></p> <p style="text-align: center;">Thousands-Block Application Form - Part 1A Revised: January 4, 2016</p> <p style="text-align: center;"><u>Individual Block Request</u></p> <p>Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Changeⁱ <input type="checkbox"/> Disconnect</p> <p style="text-align: center;">General Application Information</p> <p>1.1 Contact Information:</p> <p>Block Applicant:</p> <p>Company Name: <u>BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL</u></p> <p>Headquarters Address: <u>500 Broad St SE</u></p> <p>City: <u>Gainesville</u> State: <u>GA</u> ZIP: <u>30501</u></p> <p>Contact Name: <u>Rena Buttica</u></p> <p>Contact Address: <u>500 Broad St SE</u></p> <p>City: <u>Gainesville</u> State: <u>GA</u> ZIP: <u>30501</u></p> <p>Phone: <u>770-945-9630</u> Fax: <u>770-945-9630</u></p> <p>E-mail: <u>rw0052@att.com</u></p> <p>Pooling Administrator:ⁱⁱ</p> <p>Contact Name: <u>Agnes Rom</u></p> <p>Contact Address: <u>1800 Sutter St</u></p>	

City: Concord State: CA ZIP: 94520
 Phone: 925-363-7650 Fax: 925-363-7681
 E-mail: agnes.rom@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 502 LATA: 462 OCN^{iv}: 9419 Parent Company's OCN
9400

Number of Thousands-Blocks Requested : 1

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

Rate Center^{vi}: LOUISVILLE

1.3 Dates:

Date of Application^{vii}: 05/18/2017 Requested Effective Date^{viii}:
06/18/2017

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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 : 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 _____ 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) or by contacting inc@atis.org as of the date of this application.

<u>Rena Buttica</u>	<u>Sr. Specialist</u>	<u>05/18/2017</u>
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^{xi}. 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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} Common Language[®] and Telcordia[®] are registered trademarks and CLLITM, LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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Pooling Administration System

[Sign Out](#)

rw0052@att.com (SP)

Time : 05/18/2017 02:24:09 PM EDT

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **502-LOUISVILLE-KY-1016489**

Date: **Thursday, May 18, 2017** 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)²:**502 540 A 502 540 0 502 540 1
502 540 2 502 540 3 502 540 4 502 540 5 502 540 6 502 540 7 502 243 0 502 243 1 502 243 2 502
243 3 502 243 4 502 243 6 502 243 8 502 243 9 502 244 A 502 245 A 502 247 A 502 253 A 502
254 A 502 394 A 502 259 A 502 259 1 502 259 2 502 259 3 502 259 4 502 259 5 502 259 6 502
259 7 502 259 9 502 261 A 502 263 A 502 263 0 502 263 1 502 263 2 502 263 4 502 263 5 502
263 6 502 263 7 502 407 3 502 559 A 502 560 A 502 560 0 502 560 1 502 560 2 502 560 3 502
560 4 502 560 5 502 560 6 502 560 7 502 560 8 502 561 A 502 562 A 502 566 A 502 266 A 502
267 A 502 271 A 502 271 1 502 271 3 502 412 A 502 413 4 502 568 A 502 568 0 502 568 1 502
568 2 502 568 3 502 568 4 502 568 5 502 568 6 502 568 8 502 568 9 502 569 A 502 571 A 502
572 A 502 572 1 502 572 2 502 572 3 502 574 A 502 581 A 502 582 A 502 583 A 502 584 A 502
585 A 502 587 A 502 271 6 502 272 A 502 272 5 502 272 7 502 272 8 502 420 A 502 420 0 502
420 1 502 420 2 502 420 3 502 420 4 502 420 5 502 420 6 502 420 7 502 420 9 502 423 A 502 425
A 502 426 A 502 588 A 502 588 0 502 588 1 502 588 2 502 588 3 502 588 4 502 588 6 502 588 7
502 588 8 502 588 9 502 589 A 502 595 A 502 595 0 502 595 1 502 595 2 502 595 3 502 595 4
502 595 5 502 595 6 502 595 9 502 596 A 502 287 4 502 287 5 502 287 6 502 292 A 502 292 0
502 292 1 502 292 2 502 292 3 502 429 A 502 297 A 502 297 0 502 297 5 502 297 6 502 297 8
502 297 9 502 438 A 502 438 2 502 446 A 502 447 A 502 448 A 502 449 A 502 451 A 502 452 A
502 454 A 502 456 A 502 458 A 502 459 A 502 625 A 502 625 0 502 625 1 502 625 2 502 625 3
502 625 4 502 625 7 502 625 9 502 627 A 502 627 1 502 627 2 502 627 3 502 627 4 502 627 5 502
627 6 502 627 7 502 627 8 502 629 A 502 629 0 502 629 1 502 629 2 502 629 3 502 629 4 502 629
5 502 629 6 502 629 7 502 629 8 502 326 A 502 327 A 502 329 A 502 473 A 502 473 0 502 473 1
502 473 2 502 473 3 502 473 4 502 473 5 502 473 7 502 473 8 502 479 A 502 485 A 502 333 A
502 333 1 502 333 3 502 333 6 502 333 7 502 339 A 502 489 A 502 489 3 502 489 5 502 489 6
502 489 8 502 489 9 502 491 A 502 493 A 502 493 0 502 493 1 502 493 2 502 493 3 502 493 4
502 493 5 502 493 7 502 493 8 502 493 9 502 495 A 502 495 0 502 495 1 502 495 2 502 495 5 502**

495 6 502 495 7 502 495 9 502 499 A 502 210 4 502 210 5 502 359 A 502 361 A 502 363 A 502 364 A 502 217 A 502 217 0 502 217 1 502 217 2 502 217 3 502 217 4 502 217 5 502 217 6 502 217 7 502 217 8 502 217 9 502 366 A 502 367 A 502 368 A 502 374 A 502 375 A 502 522 A 502 522 0 502 522 1 502 522 2 502 522 3 502 380 A 502 380 0 502 380 1 502 380 2 502 380 3 502 380 4 502 380 5 502 380 8 502 380 9 502 522 4 502 522 5 502 522 6 502 522 7 502 522 8 502 522 9 502 228 A 502 231 A 502 238 A 502 238 3 502 238 4 502 238 5 502 238 6 502 239 A 502 240 A 502 240 0 502 240 1 502 240 3 502 240 4 502 240 5 502 240 6 502 241 A 502 243 A 502 721 A 502 961 A 502 962 A 502 963 A 502 963 9 502 964 A 502 966 A 502 966 0 502 966 1 502 966 2 502 966 3 502 966 4 502 966 5 502 966 6 502 966 8 502 966 9 502 968 A 502 969 A 502 993 A 502 995 A 502 762 A 502 762 0 502 762 1 502 762 9 502 772 A 502 774 A 502 774 1 502 774 2 502 774 3 502 774 4 502 774 5 502 774 6 502 774 7 502 774 8 502 774 9 502 775 A 502 775 0 502 775 1 502 775 2 502 775 3 502 775 4 502 775 5 502 775 6 502 775 7 502 775 8 502 776 A 502 778 A 502 779 A 502 779 2 502 779 3 502 779 4 502 779 5 502 779 6 502 779 7 502 779 8 502 779 9 502 809 A 502 810 A 502 810 0 502 810 1 502 810 2 502 810 3 502 810 5 502 810 6 502 810 9 502 632 A 502 632 8 502 634 A 502 635 A 502 636 A 502 637 A 502 638 A 502 638 0 502 638 1 502 638 3 502 638 6 502 638 7 502 638 8 502 638 9 502 852 A 502 854 A 502 873 A 502 666 A 502 666 0 502 666 1 502 874 A 502 666 2 502 666 3 502 666 4 502 666 5 502 666 6 502 666 7 502 666 8 502 666 9 502 671 A 502 671 0 502 671 1 502 671 2 502 671 5 502 671 6 502 671 7 502 671 8 502 891 A 502 893 A 502 894 A 502 895 A 502 896 A 502 897 A 502 681 A 502 681 0 502 681 1 502 899 A 502 710 2 502 710 3 502 710 4 502 710 5 502 710 6 502 710 7 502 710 8 502 928 A 502 933 A 502 935 A 502 937 A

Name of Block Applicant: Rena Butticaz

Signature: Rena Butticaz

Title: Sr. Specialist

Phone: 770-945-9630-

Fax: 770-945-9630

E-Mail: rw0052@att.com

A. Available Numbers: 472164

B. Assigned Numbers: 453288

C. Total Numbering Resources: 925452

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 months ⁴	<u>-18</u>	<u>1837</u>	<u>-14</u>	<u>642</u>	<u>-1733</u>	<u>-392</u>						
F. Forecast - Next 12 months ⁵	<u>54</u>	<u>1054</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>	<u>54</u>
G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):	<u>220.667</u>											
H. Months to Exhaust ⁶	$= \frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$											
	<u>Block Requested</u>	<u>Available Numbers</u>					<u>Months To Exhaust</u>					
	1	472164					2139.713					
I. Utilization ⁷	<u>Assigned Numbers (B)</u>					X 100 =		<u>48.98</u>				
	$= \frac{\text{Total Numbering Resources (C)-Excluded Numbers (D)}}{\text{Average Monthly Forecast (G)}}$											
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).

⁴Net 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.

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. (47 CFR § 52.15 (g) (4) (iii)).

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

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Pooling Administration System	
•	Sign Out
<input checked="" type="checkbox"/> rw0052@att.com (SP)	Time : 05/18/2017 02:24:33 PM EDT
	Printable Version
<p>Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3</p> <p>Revised: January 4, 2016</p> <p>Pooling Administrator's Response/Confirmation</p>	
Tracking Number :	<u>502-LOUISVILLE-KY-1016489</u>
Date of Application:	<u>05/18/2017</u> Effective Date: _____
Date of Receipt:	<u>05/18/2017</u> Date of Response: <u>05/18/2017</u>
Service Provider Name:	<u>BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL</u>
(LERG TM Routing Guide ¹) OCN:	<u>9419</u>
Parent Company OCN:	<u>9400</u>
NPAC SOA SPID :	_____
Pooling Administrator Contact Information:	
<u>Agnes Rom</u>	Phone: <u>925-363-7650</u>
Signature of Pooling Administrator	
<u>Agnes Rom</u>	Fax: <u>925-363-7681</u>
Name (print)	
Email:	<u>agnes.rom@neustar.biz</u>

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)²: LSVLKYTSDSO

Rate Center: LOUISVILLE

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 Administrator.
Explanation:

Remarks:

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

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

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Last updated: May 18, 2017.