

421 West Main Street
Post Office Box 634
Frankfort, KY 40602-063
(502) 223-3477
(502) 223-4124 Fax

January 19, 2018

HAND DELIVERY

Gwen R. Pinson
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Mark R. Overstreet
(502) 209-1219
(502) 223-4387 FAX
moverstreet@stites.com

RECEIVED

JAN 19 2018

PUBLIC SERVICE
COMMISSION

Case No. 2018-00033

RE: **Windstream Kentucky East, LLC Petition For Review (Uniontown,
Kentucky Rate Center)**

Dear Ms. Pinson:

Please find enclosed and accept for filing the original and ten copies of Windstream Kentucky East, LLC's Petition For Review of the decision of the Pooling Administrator denying Windstream's application for additional numbering resources for its Uniontown, Kentucky rate center.

Please contact me if you have any questions or require additional information.

Very truly yours,

Mark R. Overstreet



MRO

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

JAN 19 2018

PUBLIC SERVICE
COMMISSION

In the Matter of:

Windstream Kentucky East, LLC's Petition For)
Commission Review And Reversal Of A Decision) Case No. 2018- 00 033
Of The North American Number Pooling)
Administration)

PETITION FOR REVIEW, APPLICATION FOR GRANT OF NUMBERING RESOURCES,
AND REQUEST FOR EXPEDITED TREATMENT

Windstream Kentucky East, LLC, ("Windstream") petitions the Public Service Commission of Kentucky ("Commission") pursuant to 47 C.F.R. § 52.15(g)(4) to review and overturn a recent decision by the Pooling Administrator ("PA") to withhold certain numbering resources from Windstream needed by the company to continue to provide reliable and adequate service to customers. In support of its Petition Windstream states:

Windstream's Application And PA's Denial

1. On January 12, 2018, Windstream filed a request with the PA for a single "thousands" block of numbers for an LRN to serve customers in the Uniontown, Kentucky rate center. A copy of the Application is attached as EXHIBIT 1.

2. The additional numbering resources are required to permit Windstream to provide service via a new packet switch that is being deployed to support a Connect America Fund Phase 2 project in this location. According to the applicable industry *Location Routing Number (LRN) Assignment Practices document (ATIS-0300065)* Windstream must establish a unique LRN to identify the recipient switch or POI and must establish one LRN per LATA per switch from an

assigned NXX for the recipient switch in the number portability capable network. Thus, Windstream must obtain an LRN for the new packet switches located in the Uniontown rate center. Also pursuant to industry guidelines, only an NXX code holder can obtain an LRN, thus necessitating Windstream's request for an NXX code for this rate center. It should be noted, however, that Windstream would retain only a single thousand-number-block from the new NXX code.

3. On January 12, 2018, the PA denied Windstream's requests on the grounds that Windstream had not satisfied the months-to-exhaust ("MTE") criteria established in the Central Office Code Assignment Guidelines. A copy of the PA's denial is attached as **EXHIBIT 2**.

4. Windstream has demonstrated a verifiable need due to its needs in connection with a Connect America Fund Phase 2 project upgrade to this rural exchange.

5. Windstream cannot satisfy the need for numbering resources from its current inventory or in any other manner and has exhausted all other available remedies.

Basis For Commission Review And Action

6. Under federal numbering rules, a state commission may overturn the PA's decision based on the determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹

7. In its Third Report and Order in the Number Resource Optimization proceeding, the Federal Communications Commission ("FCC") found that "a carrier should be able to get additional number resources when there is verifiable need due to the carrier's inability to satisfy a

¹ 47 C.F.R. § 52.15(g)(4)

specific customer request.”² Thus, the Commission has the authority to overturn the PA’s decision in this matter.

8. As set forth above, Windstream has demonstrated a verifiable need due to deployment of a new switch and corresponding new service in connection with a Connect America Fund Phase 2 project upgrade to this rural exchange. In other cases, the Commission has granted the requested numbering relief despite the PA’s determination that the carrier did not meet the MTE or utilization thresholds.³

9. Granting Windstream’s Petition will not adversely affect the numbering resources available for use by carriers throughout the state in providing telecommunications services to their customers. Granting Windstream’s request is in the public interest and consistent with the FCC’s rules and decisions.

Request For Expedited Treatment

10. Windstream respectfully requests that the Commission act upon this Petition within ten (10) business days. Expedited treatment is required to meet the needs of the persons to be served through the switch and Windstream’s internal business plans and the Connect America Fund Phase 2 schedule.

11. The FCC also has recognized the importance of timely action:

[W]e recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier’s ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish a specific time limit for

² *Number Resource Optimization*, Third Report and Order and Second Order on Reconsideration, FCC 01-362, 17 FCC Rcd 252, ¶ 64 (2001) (“*Third Report and Order*”).

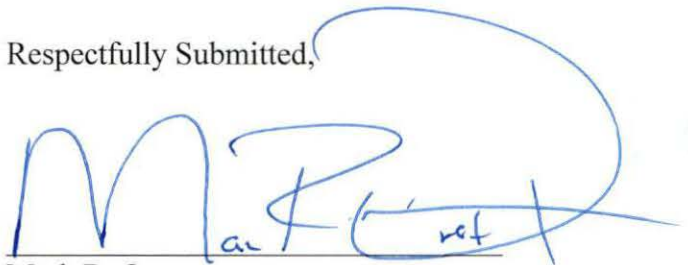
³ See, Order, Case No. 2017-00381 (Ky. P.S.C. October 03, 2018); Order, Case No. 2017-00043 (Ky. P.S.C. February 20, 2017); Order, Case No. 2016-00194 (Ky. P.S.C. June 16, 2016); Order, Case No. 2015-00323 (Ky. P.S.C. October 16, 2015); Order, Case No. 2015-00157 (Ky. P.S.C. June 4, 2015).

states to act on these requests, we believe that, in most instances, ten (10) business days from receipt of a request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.⁴

Therefore, Windstream respectfully requests that the Commission:

1. Overturn the Pooling Administrator's decision;
2. Direct the PA to grant Windstream's requests for numbering resources; and
3. Enter its Order doing so within ten (10) business days, or as soon thereafter as is possible; and
4. Grant Windstream such further relief as may be appropriate.

Respectfully Submitted,



Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
(502) 223-3477

COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

⁴ *Third Report and Order* at ¶66.

EXHIBIT 1

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

Revised: January 4, 2016

Tracking Number: **270-UNIONTOWN-KY-1064572**

Full NXX: LRN

Type of Application: New Change¹
 Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **WINDSTREAM KENTUCKY EAST, INC. - LONDON**

Headquarters Address: **4001 RODNEY PARHAM ROAD**

City, State, Zip: **LITTLE ROCK, AR, 72212**

Contact Name: **MARY RICHARDS**

Contact Address: **301 N MAIN STREET**

City: **GREENVILLE** State: **SC** ZIP: **29609**

Phone: **864-672-5329** Fax :

E-mail: **MARY.RICHARDS@WINDSTREAM.COM**

Code Administrator:²

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

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

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

1.2 NPA: **270** NXX:³ LATA: **464** OCN:⁴**9691**
Parent Company's OCN(s) **G118**

Switching Identification (Switching Entity/POI)

⁵UNTWKYXAPS0

Locality/City/Wire Center:

Rate Center:⁶**UNIONTOWN**

Homing Tandem Operating Co.⁷:**AT&T**

Tandem Homing
CLLI^{TM8}:**OWBOKYMA1GT**

1.3 Dates

Date of Application: 01/12/2018

Requested Effective

Date:^{9,10}

03/19/2018

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

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

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): Incumbent Local Exchange Carrier (ILEC)

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

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

OCN-Intra-company¹¹ Switching Id Rate Center Tandem Homing CLLI

OCN-Inter-company¹² 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: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): CAF2 SWITCH DEPLOYMENT

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 application¹⁴.

MARY RICHARDS

Signature of Code Applicant

CODE ADMINISTRATOR

Title

01/12/2018

Date

¹Identify type and reason for change(s) in Section 1.4(e).

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

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

⁴Operating 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™ Routing Administration (TRA) on 732-699-6700.

⁵This 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® Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

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

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

⁹Code 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.

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

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The 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.

¹⁴An incomplete form may result in delays in processing this request.

Tracking Number: **270-UNIONTOWN-KY-1064572**Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**Full NXX: LRN**Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **WINDSTREAM KENTUCKY EAST, INC. - LONDON**

Headquarters Address: **4001 RODNEY PARHAM ROAD**

City: **LITTLE ROCK** State: **AR** ZIP: **72212**

Contact Name: **MARY RICHARDS**

Contact Address: **301 N MAIN STREET**

City: **GREENVILLE** State: **SC** ZIP: **29609**

Phone: **864-672-5329** Fax:

E-mail: **MARY.RICHARDS@WINDSTREAM.COM**

Pooling Administrator:ⁱⁱ

Contact Name: **Margaret Harrell-Simington**

Contact Address: **1800 Sutter Street, Suite 780**

City: **Concord** State: **CA** ZIP: **94520**

Phone: **925-363-8747** Fax: **925-363-8747**

E-mail: **margaret.harrell-simington@neustar.biz**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: **X**

NPA: 270 LATA: 464 OCN^{iv}: 9691 Parent Company's OCN
G118

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI^v):
UNTWKYXAPS0

Rate Center^{vi}: UNIONTOWN

1.3 Dates:

Date of Application^{vii}: 01/12/2018 Requested Effective Date^{viii}:
03/19/2018

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 : 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) 270-xxx-9,

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.

MARY RICHARDS

CODE ADMINISTRATOR

01/12/2018

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 (iconectivTM) LERGTM 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 iconectivTM 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 CLLI[™], LERG[™] Routing Guide and iconectiv[™] 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 Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 270-UNIONTOWN-KY-1064572

Date: Friday, January 12, 2018 OCN: 9691

Company Name: WINDSTREAM KENTUCKY EAST, INC. - LONDON

Rate Center: UNIONTOWN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 270-822-0,2,3,4,5,9

Name of Block Applicant: MARY RICHARDS

Signature: MARY RICHARDS

Title: CODE ADMINISTRATOR

Phone: 864-672-5329-

Fax:

E-Mail: MARY.RICHARDS@WINDSTREAM.COM

A. Available Numbers: 5024

B. Assigned Numbers: 924

C. Total Numbering Resources: 6000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation³: 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
<u>7</u>	<u>2</u>	<u>0</u>	<u>5</u>	<u>6</u>	<u>1</u>						

E. Growth History - Previous 6 months⁴

F. Forecast - Next 12 months⁵ 22 23 24 26 27 28 30 31 33 34 36 38

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):25.0

H. Months to Exhaust⁶ = $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	5024	200.96

I. Utilization⁷ = $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{15.4}$

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).

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))

Appendix 3 - Modified August 6, 2001

1064572

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1
(Thousands-Block Number Pooling Growth Block Request)**

Date: 01/10/18 OCN: 9691 Company Name: WINDSTREAM COMMUNICATIONS INC

Rate Center: Union Town

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): 270-822-0,2,3,4,5,9

Name of Block Applicant CAROL BANGS Signature: _____

Title: MIROR ADMINISTRATION Telephone No.: 786-629-4242 FAX No.: _____

E-Mail: carol.bangs@windstream.com

A. Available Numbers: 5024

B. Assigned Numbers: 924

C. Total Numbering Resources: 6000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: _____

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 ²	+7	+2	0	+5	+6	+1						
	22	23	24	26	27	28	30	31	33	34	36	38

F. Forecast – Next 12 months³

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 25

H. Months to Exhaust⁴ $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = 4999$

I. Utilization⁵ $\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)} \cdot 15}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = 15\%$

Explanation:

1 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.

2 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.

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

4 To 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, § 52.15 (g) (3) (iii)).

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

EXHIBIT 2

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 270-UNIONTOWN-
KY-1064572

Date of Application: 01/12/2018 Effective Date: _____

Date of Receipt: 01/12/2018 Date of Response: 01/12/2018

Service Provider Name: WINDSTREAM KENTUCKY EAST, INC. - LONDON

(LERGTM Routing Guide¹) OCN: 9691

Parent Company OCN: G118

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-363-8747

Signature of Pooling Administrator

Margaret Harrell-Simington Fax: 925-363-8747

Name (print)

Email: margaret.harrell-simington@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): _____

UNTWKYXAPS0

Switch Identification (Switching/POI)²:

Rate Center:

UNIONTOWN

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:

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.