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COMMONWEALTH OF KENTUCKY

AUG 20 2019

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

PUBLIC SERVICE  
COMMISSION

In the Matter of:

TDS Telecom – Lewisport Telephone Company Petition for	)	
Commission Review and Reversal of a Decision of the	)	Case No. 2019 - <u>00288</u>
North American Number Pooling Administration	)	

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

TDS Telecom on behalf of Lewisport Telephone Company (“LTC”) petitions the Kentucky Public Service Commission (“Commission”) pursuant to 47 C.F.R 52.15(g)(4) for an expedited review of NeuStar’s denial of TDS’s application for use of central office code numbering resources in the 270 or 364 area code.

Lewisport Telephone Company respectfully shows the Commission as follows:

1. LTC is a telecommunications public utility regulated by the Commission providing intraLATA, local exchange telecommunications services in the Dwarf Rate Center.
2. NeuStar is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”). See C.F.R. § 52.13(a), (b).
3. On March 31, 2000, the Federal Communications Commission issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization (“FCC 00-104” or the “March Order”). On December 29, 2000, the FCC issued its 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 (“FCC 00-429” or the “December Order”). These FCC orders addressed issues and strategies relating to the efficient use of numbering resources.

4. In FCC 00-104 and FCC 00-429, the FCC announced rules and sought comments in an effort to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to slow further exhaustion of existing numbers under the NANP.
5. 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 NeuStar. 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 be exhausted within six months of the application. Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NeuStar 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 in order for a code to be assigned.
6. This 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 Order ¶ 105. On December 28, 2001, the FCC entered an order retaining the rules requiring carriers to calculate MTE on a rate center basis rather than on a per-switch basis. *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, CC Docket Nos. 99-200, 96-98 and 95-116, Third Report and Order and Second Order on Reconsideration in CC Docket No. 99-200, FCC 01-362, Paragraph 48 (rel. Dec. 28, 2001).
7. On June 18, 2019, LTC submitted a Central Office Code (NXX) Assignment Request - Part 1, and the CO Code Assignment - Months to Exhaust Certification Worksheet,

**(Exhibit A)** to NeuStar to be assigned in the 270 or 364 Code for the Lewisport Rate Center. The Central Office Code Assignment Request and the Thousand Block Application Form are attached hereto as **Exhibit B**.

8. LTC does not meet the NANPA utilization guidelines needed to obtain a new LRN in Lewisport, KY and LTC is requesting a state waiver from the commission. LTC is committed to returning the LRN and all associated number blocks to NANPA once LTC has completed its full customer migration and decommission of the legacy switch. LTC is anticipating the full customer migration and decommission of the legacy switch within five years of implementation of the new packet switch. If unforeseen circumstances arise and LTC does not meet this deadline LTC will request an extension from the commission.
9. The code assignment request is based on LTC intention to install a state of the art packet switching system in Lewisport, KY which will eventually replace our legacy switch. In order to conduct an orderly transition to this new platform LTC requires the use of numbering resources, specifically a "Local Routing Number" (LRN) that will allow the new packet switch to co-exist with the legacy switching equipment. Once the transition is complete TDS intends to return this code to the NANPA for reuse elsewhere in the state.
10. LTC requires only requires a single block from a new NXX be assigned to establish a LRN, LTC is requesting a full code be assigned and will retain all 10 blocks to prevent contamination and assignment of numbers within the entire NPA-NXX. LTC will only use numbers for a LRN and milliwatt test number and will ensure all other numbers are blocked, so a smooth relinquishment of the NPA-NXX can happen when our legacy switch is decommissioned. This will prevent other blocks from being assigned to other carriers within the Lewisport, KY rate center and will help ensure the code can be re-purposed in the future within the geographic area served by the 270 and 364 NPA's.

11. LTC completed the applications in accordance with NeuStar's Central Office Code (NXX) Assignment Guidelines and completed the necessary Months to Exhaust Certification Worksheet required by NeuStar.
12. Despite the fact that Lewisport Rate Center may not exhaust for the block requested 588.20 months, LTC is unable to utilize the new of the art packet switching without the new NXX numbers. **(Exhibit A)**
14. On June 18, 2019, NeuStar's Central Office Code Administration denied the code assignment requests on the grounds that LTC had not met the 75% utilization criteria now set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that LTC does not have the numbering resources needed to provide the service required in connection with its new Metaswitch. The Pooling Administrator's Response Confirmation are included in **Exhibit A**.
15. LTC's inability to utilize the new Metaswitch without the requested numbers prevents LTC from providing the quality of service its customer's desire and expect.
16. Both FCC 00-104 and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory commissions have the power and authority to review NeuStar's decision to deny a request for numbering resources. See FCC 00-104, Appendix A, Final Rules, § 52.15(g) (3) (iv) ("The carrier may challenge the NeuStar's decision to the appropriate state regulatory commission"); NeuStar Central Office Code (NXX) Guidelines § 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").
17. The Commission has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs.
18. The Commission, and not the FCC, is the most appropriate body to address this appeal. As noted above, the Commission has been granted jurisdiction to hear appeals from

NeuStar's decisions regarding numbering resources. Any jurisdiction of the FCC to do the same is merely concurrent with the jurisdiction of the Commission. LTC believes that the Commission can more quickly address the numbering problem facing LTC, and, because time is of the essence, LTC believes it is appropriate to pursue this matter in the forum that can most quickly address the issue.

19. Under earlier months-to-exhaust procedures used by NeuStar, 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 its needs. Under existing procedures, NeuStar looks at the number of months-to-exhaust for the entire rate center without any exceptions. The current process for review is arbitrary and results in decisions contrary to the public interest and decisions that do not necessarily preserve the efficient use of telephone numbers or postpone dates of exhaust. Moreover, the denial of sufficient numbering resources to LTC to meet its customers' needs 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 ¶ 61. By refusing to grant numbering resources sufficient to meet STC customers' needs, NeuStar is preventing these customers from obtaining the service of their choice from the carrier of choice, LTC
20. Notwithstanding its need for an NNX to make its new MetaSwitch functional and to serve its customers, LTC analysis indicates that LTC will be unable to meet the months-to-exhaust and utilization threshold at the rate center level in time to obtain adequate numbering resources to serve these customers absent relief from the Authority. This situation will result in LTC's inability to utilize the new Metaswitch and provide the services it makes available to LTC's customers.

**CONCLUSION**

For the reasons articulated above, TDS Telecom on behalf of Lewisport Telephone Company respectfully urges the Commission to direct NeuStar to provide the requested NNX to enable Lewisport Telephone Company to obtain the needed functionality and upgraded service of its Metaswitch and meet the requirements of its customers in order that they may receive the service of their choice from the provider of their choice to meet their telecommunications needs.

WHEREFORE, Lewisport Telephone Company requests:

1. The Commission review the decision of the NeuStar to deny Lewisport Telephone Company request for additional numbering resources; and
2. The Commission directs NeuStar to provide the NPA/NXX to Lewisport Telephone Company to establish and assign an LRN to the Metaswitch in the Lewisport Rate Center.

Respectfully submitted,



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James Liebman  
Liebman & Liebman  
403 W. Main St.  
Frankfort, KY 40601

# EXHIBIT A

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

Revised: January 4, 2016

Tracking Number: 270-LEWISPORT-KY-1164461

Full NXX: LRN

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

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: LEWISPORT TELEPHONE CO., INC.

Headquarters Address: 525 Junction Road

City, State, Zip: Madison, WI, 53717

Contact Name: Anne Chism

Contact Address: 525 Junction Road

City: Madison State: WI ZIP: 53717

Phone: 608-824-0266 Fax :

E-mail: anne.chism@tdstelecom.com

Code Administrator:<sup>2</sup>

Name: David Morgan

Address: 2411 Dulles Corner Park Suite 250

City: Herndon State: VA ZIP: 20171

Phone: 571-363-3823 Fax : 571-363-3838

1.2 NPA: 270 NXX:<sup>3</sup> 464 LATA: 0412 Parent Company's  
OCN(s) 0881

Switching Identification (Switching Entity/POI) <sup>5</sup>LWPTKYXAPS0



Locality/City/Wire Center: LEWISPORT

Rate Center: <sup>6</sup>LEWISPORT

Homing Tandem Operating Co. <sup>7</sup>: BELLSOUTH TELECOMM Tandem Homing  
INC DBA SOUTH CENTRAL BELL TEL CLLI <sup>TM8</sup>: MDVIKYMA02T

1.3 Dates

Date of Application: 06/18/2019

Requested Effective

Date: <sup>9,10</sup>

12/13/

2019

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) 270-610,770,919 OR anything from the overlay code 364-200, 364-210 or next available

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): \_\_\_\_\_

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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:

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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>.

Anne Chism

Signature of Code Applicant

Sr. Administrator - Number  
Management

Title

06/18/20  
19

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>SM</sup> Location Code (CLLI<sup>TM</sup> Code) of the applicant's switch or POI. Common Language<sup>SM</sup> and Telcordia<sup>SM</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.

<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 CLLI™ 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: 270-LEWISPORT-KY-1164461

Thousands-Block Application Form - Part 1A

Revised: January 4, 2016

Full NXX: LRN

Type of Application:  New       Change<sup>i</sup>       Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: LEWISPORT TELEPHONE CO., INC.

Headquarters Address: 525 Junction Road

City: Madison      State: WI      ZIP: 53717

Contact Name: Anne Chism

Contact Address: 525 Junction Road

City: Madison      State: WI      ZIP: 53717

Phone: 608-824-0266      Fax:

E-mail: anne.chism@tdstelecom.com

Pooling Administrator:<sup>ii</sup>

Contact Name: Margaret Harrell-Simington

Contact Address: 1800 Sutter Street, Suite 780

City: Concord      State: CA      ZIP: 94520

Phone: 925-420-0346      Fax: 925-420-0377

E-mail: mharrell-simington@somos.com

1.2 General Information:

Check one : No LRN needed \_\_\_\_\_ LRN needed<sup>iii</sup>:  X

NPA:  270  LATA:  464  OCN<sup>iv</sup>:  0412  Parent Company's  
OCN  0881

Number of Thousands-Blocks Requested :  10

Switch Identification (Switching  
Entity/POI<sup>v</sup>):  LWPTKYXAPS0

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

### 1.3 Dates:

Date of Requested Effective  
Application<sup>vii</sup>:  06/18/2019  Date<sup>viii</sup>:  12/13/2019

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)  270-610,770,919 OR anything from the overlay code 364-200, 364-210 or next available
- 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-0,270-xxx-1,270-xxx-2,270-xxx-3,270-xxx-4,270-xxx-5,270-xxx-6,270-xxx-7,270-xxx-8,270-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  Switching Id  Part 1B

OCN: Inter-company  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.

<u>Anne Chism</u>	<u>Sr. Administrator - Number Management</u>	<u>06/18/2019</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<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™ 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® 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) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 270-LEWISPORT-  
KY-1164461

Date of Application: 06/18/2019 Effective Date: \_\_\_\_\_

Date of Receipt: 06/18/2019 Date of Response: 06/18/2019

Service Provider Name: LEWISPORT TELEPHONE CO., INC.

(LERG™ Routing Guide¹) OCN: 0412

Parent Company OCN: 0881

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-420-0346

Signature of Pooling Administrator

Margaret Harrell-Simington Fax: 925-420-0377

Name (print)

Email: mharrell-simington@somos.com

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>: LWPTKYXAPS0

Rate Center: LEWISPORT

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<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> 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.

# EXHIBIT B

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: 270-LEWISPORT-KY-1164461

Date: Tuesday, June 18, 2019    OCN: 0412    Company Name: LEWISPORT  
TELEPHONE CO., INC.

Rate Center: LEWISPORT

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 270-295-2, 270-295-3, 270-295-4, 270-295-5, 270-295-6, 270-295-7, 270-295-8,

Name of Block Applicant: Anne Chism

Signature: Anne Chism

Title: Sr. Administrator - Number Management  
Fax:

Phone: 608-824-0266-

E-Mail: anne.chism@tdstelecom.com

A. Available Numbers: 4323

B. Assigned Numbers: 2677

C. Total Numbering Resources: 7000

D. 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>: 0

List  
 Excluded  
 Code(s) or n/a  
 Block(s):

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

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

<u>15</u>	<u>10</u>	<u>14</u>	<u>12</u>	<u>15</u>	<u>26</u>
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F. Forecast - Next 12 months<sup>5</sup>

<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 15.0

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>
1	4323	288.20
2	5323	354.867
3	6323	421.533
4	7323	488.20
5	8323	554.867
6	9323	621.533
7	10323	688.20
8	11323	754.867
9	12323	821.533
10	13323	888.20

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

Assigned Numbers (B)

X 100 =

38.24  
3

AVERAGE  
= 588.2 MTHS

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>List all numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

<sup>3</sup>The total quantity of numbers available for assignment from the numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>4</sup>The total quantity of numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>5</sup>Quantity of numbers activated in the past 90 days indicates newly acquired 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>6</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>7</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>10</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).