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October 4, 2019

RECEIVED

OCT 07 2019

PUBLIC SERVICE
COMMISSION

Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Re: *Time Warner Cable Information Services (KY) Petition Requesting the Commission's Intervention in NANPA Assignments for Ashland, KY*
Case No. 2019-0000374

Dear Ms. Pinson:

Enclosed are the original and ten copies of the *Petition for Access to Numbering Resources* of Time Warner Cable Information Services (KY), LLC ("TWCIS"). In addition, one extra copy is enclosed which we request that your office file-stamp and return in the enclosed envelope.

The *Petition* requests the Kentucky Public Service Commission overturn the decision of the Pooling Administrator to withhold numbering resources from TWCIS which are needed to provide requested service to a medical center in Ashland, KY. Denial of numbering resources is a barrier to local voice competition in Kentucky.

Should the Commission or Commission Staff need additional information or have questions about the *Petition*, please advise. Thank you for your assistance.

Very truly yours,

A handwritten signature in blue ink that reads "C. Kent Hatfield".

C. Kent Hatfield

CKH:ec
Enclosures as mentioned
cc: Time Warner Cable Information Services (KY), LLC

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OCT 07 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In re the Matter of:

TIME WARNER CABLE INFORMATION)	
SERVICES (KY) PETITION REQUESTING)	
THE COMMISSION'S INTERVENTION IN)	CASE NO. 2019-00 <u>00374</u>
NANPA ASSIGNMENTS FOR ASHLAND, KY.)	

PETITION FOR ACCESS TO NUMBERING RESOURCES

Time Warner Cable Information Services (KY), LLC (“TWCIS”) petitions the Kentucky Public Service Commission (“Commission”) pursuant to 47 C.F.R. § 52.15(g)(4) and Section 11.1 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (ATIS-0300066, September 5, 2014), to overturn the Pooling Administrator’s (“PA”) decision to withhold numbering resources from the carrier. As shown below, TWCIS has complied with the reporting and numbering resource application requirements, and is entitled to relief necessary for it to serve voice customers within its Kentucky service area.

TWCIS is a utility providing service in various Kentucky exchanges including within the Ashland Rate Center. TWCIS must have access to numbering resources to serve new customers requesting voice service in any rate center. TWCIS attempted to obtain 10,000 telephone numbers within the Ashland rate center to meet the needs of a medical center, but the PA rejected the request, citing MTE and/or Utilization requirements. *See* Exhibit One.

Denial of numbering resources is a barrier to local voice competition in Kentucky. The Federal Communications Commission addressed this multiple times in the *Local Competition* proceeding when it considered how to optimize access to numbering. “Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources. For consumers to benefit from the

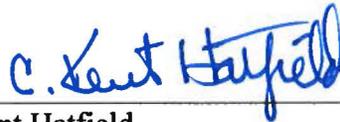
competition envisioned by the 1996 Act, it is imperative that competitors in the telecommunications marketplace face as few barriers to entry as possible.” See *In the Matter of Numbering Resource Optimization*, 16 FCC Rcd. 3479 (2001).

The Administration Guidelines contemplate that disagreements may arise between the PA and Block Holders/Applicants related to administration of the guidelines. Accordingly, the guidelines require reasonable, good faith efforts to resolve disagreements prior to pursuing any appeal. TWCIS and the PA have fulfilled that requirement. On August 21, 2019 the Pooling Administrator Manager advised TWCIS “[y]ou may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial.” This Petition is thus required.

WHEREFORE, Time Warner Cable Information Services (KY) respectfully request that the Commission grant this petition and order the PA to allocate the requested numbering resources in Ashland to TWCIS.

Dated: October 4, 2019

Respectfully submitted



C. Kent Hatfield
STOLL KEENON OGDEN PLLC
500 W. Jefferson Street, Suite 2000
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*Counsel to Time Warner Cable Information
Services (KY) LLC*

Blevins, Allyson I

From: mharrell-simington@somos.com
Sent: Wednesday, August 21, 2019 9:03 AM
To: Blevins, Allyson I
Cc: PA_Part3@somos.com
Subject: , 606-ASHLAND-KY-1178879 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 21 August 2019

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 606-ASHLAND-KY-1178879

Date of Application: 08/21/2019 **Effective Date:** _____
Date of Receipt: 08/21/2019 **Date of Response:** 08/21/2019

Service Provider Name: TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY
(LERG™ Routing Guide¹) OCN: 698F
Parent Company OCN: 575C

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)²: ASLDKYXAJMD
 Rate Center: ASHLAND

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

 Request Withdrawn.

Explanation:

 Assignment Activity Suspended by 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.