



221 E Fourth Street  
Cincinnati, Ohio 45201-2301

June 13, 2025

Kent Chandler  
Executive Director  
Kentucky Public Service Commission  
221 Sower Boulevard  
PO Box 615  
Frankfort KY 40602-0615

RE: In the Matter of the Commission's Consideration of Telephone Safety Valve Requests  
and  
Other Number Resource Related Filings, PSCK Case No. \_\_\_\_\_

Dear Mr. Chandler,

Accompanying this letter is a Petition of Cincinnati Bell Telephone Company LLC d/b/a altafiber Network Solutions for Review of a Decision of the Number Pooling Administrator to be filed in connection with the above referenced proceeding. This Petition and attachments are being filed electronically and are contained entirely within this PDF document. Questions regarding this filing may be directed to me at the above address or by telephone at (859) 653-0220.

Sincerely,

Julie M. Riess  
Regulatory Manager  
(859) 653-0220

Cc: [PSCED@ky.gov](mailto:PSCED@ky.gov) (via email)

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

<b>In the Matter of the Commission's</b>	)	
<b>Consideration of the Telephone Safety Valve</b>	)	<b>Case No. 2025-00202</b>
<b>Requests and Other Number Resource</b>	)	
<b>Related Filings</b>	)	

**PETITION OF CINCINNATI BELL TELEPHONE COMPANY LLC  
d/b/a ALTA FIBER NETWORK SOLUTIONS  
FOR REVIEW OF A DECISION OF THE POOLING ADMINISTRATOR**

Cincinnati Bell Telephone Company LLC d/b/a altafiber Network Solutions ("CBT") hereby requests that the Commission review and overturn a decision of the number Pooling Administrator ("PA") which denied a CBT request for numbering resources.

On June 12, 2025, CBT filed a request with the PA seeking 6,000 numbers in the 859 area code and Covington rate center to meet a specific customer request that CBT was unable to satisfy with its existing numbering resources. The PA denied CBT's request on the grounds that CBT does not meet the utilization and months-to-exhaust criteria established by the Federal Communications Commission ("FCC"). Under the federal numbering rules, a state commission may overturn the PA's decision based on its determination that the carrier has demonstrated a verifiable need for the number resources and has exhausted all other remedies.<sup>1</sup> For reasons set forth below, CBT submits that the Commission is justified in overturning the PA's decision and granting CBT's request for 6,000 thousands-blocks to meet the customer's needs.

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<sup>1</sup> 47 CFR 52.15(g)(4)

In its Third Report and Order in the Numbering Resource Optimization proceeding, the FCC found that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer’s request.”<sup>2</sup> It also clarified that states may grant requests by carriers in such circumstances, as long as the request is for a customer seeking contiguous blocks of numbers and not vanity numbers.<sup>3</sup> Therefore, this Commission has the authority to overturn the PA’s decision under the appropriate circumstances.

### **St. Elizabeth Request**

In the immediate case, CBT received a request from St. Elizabeth Healthcare for 6,000 consecutive and sequential DID numbers in the 859 area code to be used by its employees throughout the organization within Kentucky. Specifically, St. Elizabeth has requested six thousands-blocks in the Covington rate center using 859-XX**6** (emphasis added) to align with the existing 5-digit extensions within St. Elizabeth’s current 859-NXX combinations. Securing 6,000 numbers from 859-XX**6** will enable St. Elizabeth to maintain a uniform numbering plan within its growing healthcare system.

CBT has reviewed its number inventory, and it does not have 6,000 numbers available in the Covington rate center with the 859-XX**6** combination. However, as shown on the attached Pooling Administration worksheet, CBT’s request for six (6) thousands-blocks in the 859 area code to serve this customer was rejected because CBT does not meet the Utilization and Months-to-Exhaust threshold (see Attachment A).

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<sup>2</sup> Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration*, CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362 (rel. Dec. 28. 2001) at ¶64.

<sup>3</sup> *Id.*

**Conclusion**

For the reasons set forth above, CBT requests that the Commission overturn the PA's decision and direct the PA to grant CBT's request for six thousands-blocks from the 859-NXX to satisfy the needs of its customer.

Respectfully submitted,

/s/ Jouett Brenzel

Jouett Brenzel  
Deputy General Counsel  
Cincinnati Bell Telephone Company LLC  
d/b/a altafiber Network Solutions

## **Attachment A**

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**From:** [support@nanpa.com](mailto:support@nanpa.com) <[support@nanpa.com](mailto:support@nanpa.com)>

**Sent:** Thursday, June 12, 2025 4:18 PM

**To:** Pride, Richard <[Richard.Pride@altafiber.com](mailto:Richard.Pride@altafiber.com)>; Listo, Kimberly <[kimberly.listo@altafiber.com](mailto:kimberly.listo@altafiber.com)>

**Subject:** 859, 859-COVINGTON-KY-3110553, DENIED, NEW BLOCK REQUEST, NAS - Part 3  
Confirmation

## **NANP Administration System**

**06/12/2025**

**Tracking Number:** 859-COVINGTON-KY-3110553

# **Administrator's Response/Confirmation - Part 3**

**Revised:** October 28, 2024

**Date of Application:** 06/12/2025

**Effective Date:**

**Date of Response:** 06/12/2025

☐ Request Approved

☐ Request Suspended

☐ Request Withdrawn

☒ Request Denied

### **Administrator Comments:**

The Months to Exhaust (MTE) and/or Utilization requirements were not met. This Part 3 denial may be used to request a state waiver from the appropriate state commission.

If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

**NPA, NPA-NXX, NPA-NXX-X:** 859

**Rate Center:** COVINGTON

**State:** KY

☐ Assigned

☐ Modified

☐ Disconnected

Thousands-Block Contaminated: ☐ Yes ☐ No

If yes, the number of TNs contaminated (1-1000):

☐ Reserved

Reservation Expiration Date:

Service Provider OCN Name: CINCINNATI BELL

Service Provider OCN: 9348

OCN Category: ILEC

Parent Company OCN: 9348

NPAC SPID:

Switching Identification (Switching Entity/POI): LKPKKYL PDS0

Tandem Homing CLLI™:

Applicant Contact Name: Richard Pride

Phone: 513-565-2575

Email: [richard.pride@altafiber.com](mailto:richard.pride@altafiber.com)

Administrator Contact Name: Jeff Galeano

Phone: 925-420-0369

Email: [jgaleano@nanpa.com](mailto:jgaleano@nanpa.com)

If you have any questions, please contact NANPA Customer Support.

NANPA Customer Support

Phone: 866-623-2282

Email: [support@nanpa.com](mailto:support@nanpa.com)

Web: <https://www.nanpa.com>