

RECEIVED

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BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, TN 37201-3300  
guy.hicks@bellsouth.com

Guy M. Hicks  
General Counsel  
615 214-6301  
Fax 615 214-7406

February 9, 2006

**VIA HAND DELIVERY**

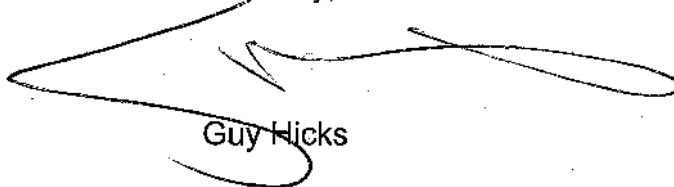
Hon. Ron Jones, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number  
Pooling Administrator Relatin to Nissan North America, Inc.*  
Docket No 06-00037

Dear Chairman Jones:

Enclosed are the original and fourteen copies of BellSouth's *Petition for Expedited Review of Central Office Code Denial*. Copies of the enclosed are being provided to counsel for the Number Pooling Administrator.

Cordially,



Guy Hicks

GH ch

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

In Re:        *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Nissan North America, Inc.*

Docket No. \_\_\_\_\_

**PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to rules adopted by the FCC for challenging determinations of the Number Pooling Administrator ("NeuStar"), petitions the Tennessee Regulatory Authority (the "Authority") for an expedited review of NeuStar's denial of BellSouth's application for use of central office code numbering resources in the 615 area code.

BellSouth respectfully shows the Authority as follows:

1.        BellSouth is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Nashville 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. BellSouth has sought reconsideration of the above-described MTE rule before the FCC on two separate occasions. 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 or about February 1, 2006, BellSouth submitted a Central Office Code (NXX) Assignment Request - Part 1, and the CO Code Assignment - Months to Exhaust Certification Worksheet, to NeuStar to be assigned new NXX code necessary to meet the demands of its customer, Nissan North America, Inc. ("Nissan"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for a new NXX in the 615 NPA area code, in response to Nissan's request for 10,000 numbers. Nissan cited the move of its Corporate offices to a temporary location in the Nashville area as its basis for this request. However, BellSouth did not have sufficient number resources available within its inventory in the Nashville Rate Center, and, accordingly, BellSouth was unable to provide Nissan with sufficient numbers to meet its needs. For this reason, BellSouth sought the numbering resources as noted above. In addition, Nissan is requesting to use this new NXX code at its permanent office

location in 2008 upon completion of construction of their permanent headquarters building in the Franklin Rate Center (Franklin – Cool Springs). Therefore, BellSouth is also requesting approval from the Authority to move this new NXX code from the Nashville Rate Center to the Franklin Rate Center at the appropriate time. BellSouth agrees to file another application with NeuStar requesting a new NXX code in the Franklin Rate Center prior to the move, and BellSouth will provide NeuStar with a copy of any Authority orders on this request at that time.

9. BellSouth 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.

10. At the time of the code request, the Nashville rate center had an MTE of approximately 66 months.

11. Despite the fact that BellSouth's Nashville rate center may not exhaust for 66 months, BellSouth is unable to provide the requested service through its switch that serves Nissan within the Nashville rate center. This is because the individual switch that serves this customer within the Nashville rate center does not have sufficient number resources to meet the customer's request.

12. On or about February 1, 2006, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that BellSouth had not met the rate center based months-to-exhaust criteria now set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that BellSouth does not have the numbering resources needed to satisfy its customers' demands in the switch at issue. That decision is attached hereto as Exhibit "C."

13. BellSouth's inability to provide this large business customer with the requested numbers prevents BellSouth from providing the quality of service this customer desires and expects. (Correspondence from Nissan is attached as Exhibit "D").

14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2004 NRUF and NPA Exhaust Analysis — October 31, 2005, the projected exhaust date of the 615 NPA is the Fourth Quarter of 2018. Therefore, granting BellSouth's request for numbering resources would not materially impact exhaustion of available numbers in the 615 NPA.

15. Both FCC 00-104 and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory authorities 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").

16. The TRA has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs. The TRA has, for example, ordered NeuStar to provide BellSouth

with numbering resources to meet the service requirements of the University of Tennessee, even though BellSouth had been unable to satisfy the required months-to-exhaust criteria. *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University of Tennessee - Chattanooga* (approved by the Directors on November 20, 2001 by a vote of 3-0) (see correspondence from TRA Executive Secretary, dated November 29, 2001, attached as Exhibit "E").

17. Similarly, state regulatory agencies in both North Carolina and Florida also have recognized their jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs. The North Carolina Utilities Commission has ordered NeuStar to provide BellSouth numbering resources needed to meet the service requirements of Guilford County Government and Corning, Inc., even though BellSouth had been unable to satisfy the required months-to-exhaust criteria. *See In the Matter of Petition of BellSouth Telecommunications, Inc. for Review of NeuStar Denial of Application for Numbering Resources*, Docket No. P-55, Sub 1268, Order Ruling on the BellSouth Petition (attached as Exhibit "F"). Similarly, on May 1, 2001, the Florida Public Service Commission voted to accept the recommendation of its staff that NeuStar should be ordered to release numbering resources to BellSouth in order to enable BellSouth to meet the needs of a customer requesting 2500 numbers, even though BellSouth could not satisfy the months-to-exhaust criteria. *See Staff Recommendation Re: Docket No. 010309-TL          Petition by BellSouth*

*Telecommunications, Inc. for an Expedited Review of the NeuStar Denial of a Central Office Code for the Orlando Magnolia Switch* (attached as Exhibit "G").

18. In reviewing previous petitions of this type, the TRA Staff has requested that BellSouth provide additional information concerning number utilization for the specific central office involved in the request. This information for the Nashville Main (NSVLTNMTDS3) Central Office is attached hereto as Exhibit

19. The Authority, and not the FCC, is the most appropriate body to address this appeal. As noted above, the Authority 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 Authority. BellSouth believes that the Authority can more quickly address the numbering problem facing Nissan and BellSouth, and, because time is of the essence to the customer, BellSouth believes it is appropriate to pursue this matter in the forum that can most quickly address the issue.

20. 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 the customer's specific request. 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 BellSouth to meet Nissan's request 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 Nissan's needs, the NeuStar is preventing Nissan from obtaining the service of its choice from its carrier of choice, BellSouth.

21. Notwithstanding customer need for a specific numbering arrangement, BellSouth's analysis indicates that BellSouth will be unable to meet the six-months-to-exhaust threshold at the rate center level in time to obtain adequate numbering resources to serve this customer absent relief from the Authority. This situation will result in BellSouth's inability to respond to its customer's needs for specific numbering resources.

### **CONCLUSION**

For the reasons articulated above, BellSouth respectfully urges the Authority to direct NeuStar to provide the requested numbers to BellSouth to enable BellSouth to meet the specific requirements of Nissan in order that Nissan may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, BellSouth requests:

1. The Authority review the decision of the NeuStar to deny BellSouth's request for additional numbering resources; and

2. The Authority direct NeuStar to provide numbers to BellSouth to meet the specific immediate requirements of Nissan in the Nashville rate center within the 615 NPA; and

3. The Authority direct NeuStar to provide numbers to BellSouth to meet the long term requirements of Nissan in the Franklin rate center within the 615 NPA by permitting BellSouth to move the NXX serving this customer from the Nashville rate center.

Respectfully submitted,

BELLSOU TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Gu M. Hicks", is written over a horizontal line.

Gu M. Hicks  
Joelle Phillips  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6311

Exhibit A  
Page 1 of 3

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

Address: https://www.nationalpooling.com/pas/frames-index.jsp

NEU STAR

Type of Application : New

1.1 Contact Information :

Note: if any of the contact info is incorrect, edit your user profile

Block Applicant :

Company Name Bellsouth SO CHTL  
Headquarters Address: 3535 Colonnade Parkway  
City: Birmingham  
State: AL  
Zip: 35243

Contact Name Mrs Pam Porterfield  
Contact Address 3535 Colonnade Parkway  
City Birmingham  
State AL  
Zip 35243  
Telephone 2051 977-3025  
E-mail pam.porterfield@bellsouth.net

Pooling Administrator :

Contact Name Ms Genevieve Pauline  
Contact Address 1800 Setter St. Ste: 780  
City Concord  
State CA  
Zip 94520  
Telephone (925) 363-7652  
Fax (925) 363-1883  
E-mail genevieve.paulino@neustar.biz

1.2 General Information

Question? Click here  
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BellSouth Telecommunications, Inc.  
Petition for Nissan North America, Inc.  
Exhibit A  
Page 3 of 3

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

Go Back New Favorites Tools

Go https://www.nationalpooling.com/pes/frm

Go Search New 100 Blocks Add Check Auto Print Options

FAKOPPS

BelSouth Sites

- BelSouth Telecommunicatio...
- BelSouth Telecommunicatio...

Links

- BERT Welcome to BellSouth...
- Alabama Telco Credit Union
- AEC 30-40
- BCCS MSOC Tally Tool
- Belarc Advisor
- Bell South - Center Mechan...
- BellSouth Corporation - Inf...
- BellSouth Educational Assist...
- BellSouth Forms
- BellSouth Intranet-Perqs
- BellSouth NewsSource pay l...
- BellSouth PCSelfHelp-Cyber...
- BellSouth.com
- Boris
- CNN.com
- CompassPC
- CWA Local 3902
- ESP Schedules
- Lake Baptist Church...
- FOXNews.com
- FRED
- Health Check

NEW STAR

Request For Resources

- Modify
- Disconnect
- Block Transfer
- Confirm Block(s) in Service
- Search Fours
- Forecast
- Create/Modify cas
- Isar rat
- onate Bled
- Reports

1.2 General Information

LRN Needed No

NPA  LATA\* 470

or 9419-BELL SOUTH SO  
CNTL

Parent Company CNN 9419

Number of Thousands-Blocks Requested

Switch Identification (Switching Identity/POI) insvltmtds

City or Wire Center Name

Rate Center NASHVILLE Rate Center Sub Zone

1.3 Dates

Date of Application Wednesday February 1, 2000

Requested Block Effective Date 4 Mar 2000

Request Expedited Treatment C Yes No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider Incumbent Local Exchange Carrier (ILEC) 15

A) Primary type of service blocks to be used for

c) Thousands-Block(s) NOX-K

assignment preference

Click here to see the available blocks in the

Question? E-mail us  
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nor

Exhibit B  
Page 2 of 4

<a href="#">www.nationalpooling.com/pas/frames-index.jsr</a> <input type="text"/> <input type="button" value="SEARCH"/>		<input type="button" value="3366"/>	
<b>N R</b>		Date Wednesday, February . 505 9419 Company Name <b>BELL SOUTH SO CNTL</b> Rate Center HA <b>HVILLE</b>	
Request For Resources  <b>2</b>		Us) all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s) (615)214 (05) 253(09) 271(23) 291(20) 335 8(17) 401 (07) 416 6-8(16) 432(14) 524 1-7(16) 532(08) 733(01) 734 0-8(23) 736(28) 741(22) 747(23) 798(11) 749 (22) 770(16) 862 (02) 880(125) (615)2 12(0000-4999) (08) 242(5000-9999) (22) 244 (01) 248(25) 251(04) 252(28) 254 (23) 255 (05) 256(0000-4999) (13) 256(5000-9999) (25) 259(16) 313(h) 5-6(13) 507 6(11) 664 (23) 687(17) 726(23) 742(08); 793 (05) 744(26) 780 )28 (615)546 (04) 662(29) 673 0-3; 6-9 (01) (615)350 (29) (611)231 (05) 23 0-3; 5-9 (08) 316(05) 391(25) 457 0-4; 7-9(13) 458(16) 574 2)11)738 2-5(26) 871 (26) 572(22) 874(13) 882(13) 883(01) 884(11) 665 (25)086 1-7;9(10) 889(04) 902 (04) 937 (17) (615)612 0-7(01) 769 1-9 (10) 860(26) 565(20) 868(11 870 0-1,3,1( 4 782 (615)269(23) 279(17) 292(14) 297(-6) 298(23) 383(19) 385(10) 386(28) 460(2	
<input type="button" value="Block Transfer"/> Block Transfer <input type="button" value="Search Fauns"/> Search Fauns <input type="button" value="Submit Forecast"/> Submit Forecast <input type="button" value="Create/Modify Forecast"/> Create/Modify Forecast 25 User Profile <input type="button" value="Donate Bloks"/> Donate Bloks <input type="button" value="Reports"/> Reports		Name of Block Applicant <b>Mrs PAM Potterfield</b> Title <b>TN Administration Specialist</b> Telephone Number <b>(205) 977-3025</b> Fax Writ E-Mail <b>pam.potterfield@bellsouth.com</b> A. Available Numbers * <b>265786</b> B. Assigned Numbers * <b>882713</b> C. Total Numbering Resources * <b>121701</b> D. Quantity of num bers activated in the past 50 • days and excluded from the Utilizati on @ • calculation * List excluded Code(s) or Block(s)	
BellSouth Sites BellSouth Telecommunicatio... BellSouth Telecommunicatio... Media Links BERT Welcome to BellSouth... Alabama Telco Credit Union ABC 33-90 BCES MSCOC Talky Tool Belair Advisor Bell South Center Mechanic... BellSouth Corporation-- Inf... BellSouth Educational Assist... BellSouth Forms BellSouth Intranet-Peeps a BellSouth NewsSource pay i. BellSouth PCSelf-Help Cyber... BellSouth.com			
N.com CompassPC CWA Local 3902: ESP Schedules Forest Lake Baptist Church, FOXNews.com FRED Health Check			
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Address: https://www.nationalpooling.com/pas/frames-index.jsp

Google

Register

BellSouth Sites:

- BellSouth Telecommunicatio...
- BellSouth Telecommunicatio...
- Media
- Links
- BERT Welcome to BellSouth...
- Alabama Telco Credit Union
- ABC 33-40
- BCCS MSOC Tally Tool
- Belarc Advisor
- Bell South - Center Mechanic...
- BellSouth Corporation - Inf...
- BellSouth Educational Assist...
- BellSouth Forms
- BellSouth Intranet-Perqs
- BellSouth NewsSource pay L...
- BellSouth PCSelfHelp-Cyber...
- BellSouth.com
- Boni
- CNN.com
- CompassPC
- CWA Local 3902
- ESP Schedules
- Forest Lake Baptist Church,
- FOXNews.com
- FRED
- Health Check

NEO STAR

Request For Resources

Modify

Disconnect

Blase Tran Ce

Confirm Block(s) in Service

Search Phone

Submit Forecast

Create/Modify Forecast

Donate Blocks

Repeats

Question? E-mail Us

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E. Growth History- Previous months

Month 1	4209	Month 2	3652
Month 3	13218	Month 4	3307
Month 5	15942	Month 6	4

F. Forecast - Next 12 months

Month 1	4107	Month 2	14107
Month 3	4107	Month 4	14107
Month 5	4107	Month 6	14107
Month 7	4107	Month 8	14107
Month 9	4107	Month 10	4107
Month 11	4107	Month 12	4107

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

H. Months to Exhaust (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (3))

Explanation

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting



Pooling Administration

STA

request For Resources

Disconnect

Block Transfer

Confirm Block(s) in Semite C

Search Forms

Submit

Create/Modify Forecast

User Profile

Donate Blocks

Reports

Question? E-mail us

https://www.n...pooling.com/pas/frames-index.jsp

Block Requested

A. Available Numbers

H. Months to Exhaust

I. Utilization (Assigned Numbers (B)) / (Total Numbering Resources (C) Excluded Number (D)) \* 100

Explanation

BellSouth Sites

BellSouth Telecommunicatio...

BellSouth Telecommunicatio...

Media

Links

BERT Welcome BellSouth...

Alabama Telco Credit Union

ABC 33-40

BCCSMISOC Tally Tool

Belarc Advisor

Bell South - Center Mechanic

BellSouth Corporation • Inf...

BellSouth Educational Ascot...

BellSouth Forms

BellSouth Intranet-Perqs

BellSouth NewsSource pay li...

BellSouth PCSelfHelp-Cyber...

BellSouth.com

CNN.com

CompassPC

CWA Local 3902

ESP Schedules

Forest Lake Baptist Church...

FOXNews.com

FRED

Health Check

Block

nth

Average Month ly Forecast (Sum of months # 1-6; (Part F above ) divided by 6)

4107.000

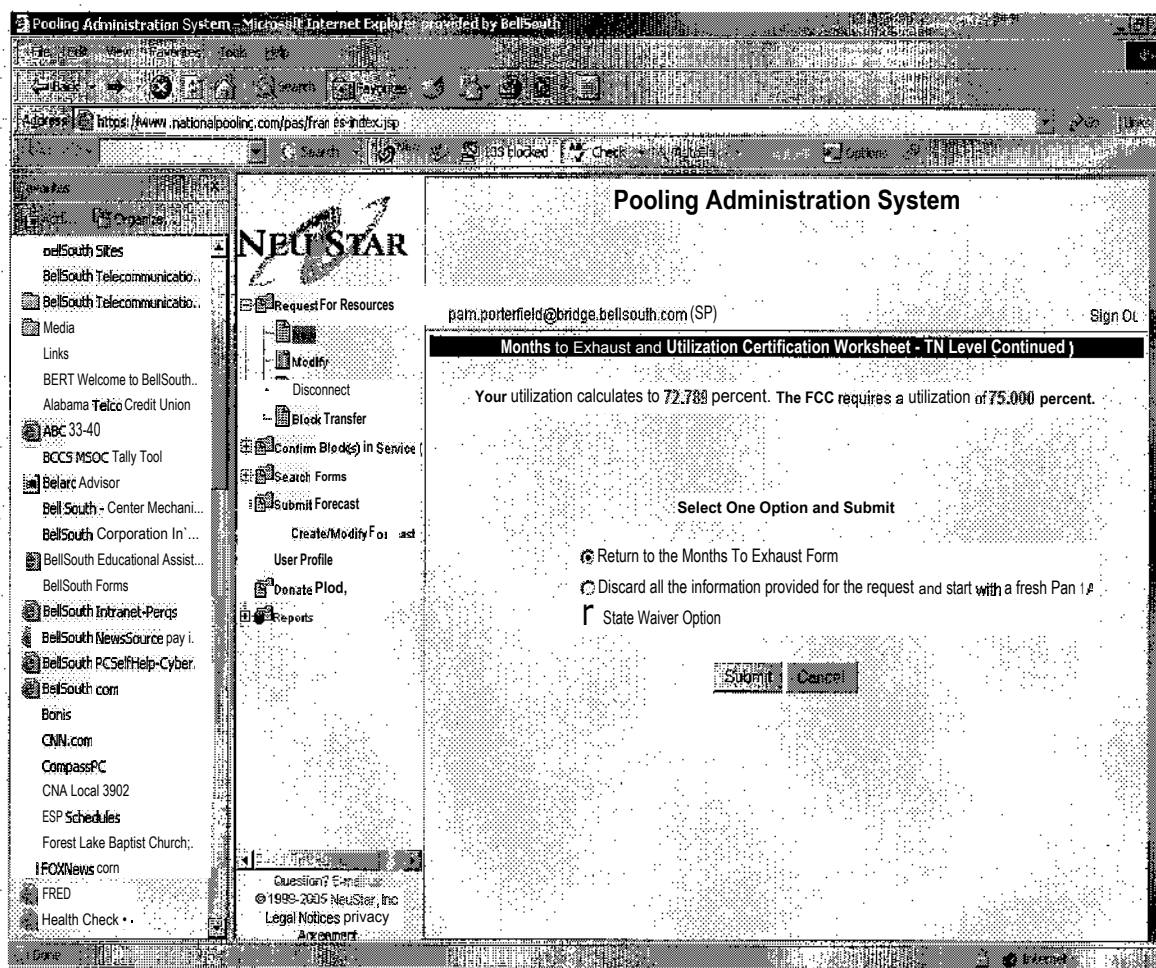
H. Months to Exhaust (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

I. Utilization (Assigned Numbers (B)) / (Total Numbering Resources (C) Excluded Number (D)) \* 100

72.789

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.

BellSouth Telecommunications, Inc.  
Petition for Nissan North America, Inc.  
Exhibit C



# NISSAN

**NISSAN NORTH AMERICA, INC.**

Corporate Office  
18501 South Figueroa St  
Gardena, California 90248-4500  
Mailing Address: P.O. Box 191  
Gardena, California 90248-0191  
Telephone: 310.532.3111

December 7, 2005

Bell South  
Attn: Ed McCracken  
Floor 23  
333 Commerce St  
Nashville, TN 37201-1800

SUBJECT: Request for new number exchange for Nissan

Dear Mr. McCracken:

As has been discussed, Nissan will be moving its Corporate offices to a temporary location in Nashville in the June 2006 **timeframe**. New facilities will be constructed in Franklin, Tennessee, and Nissan will then move from the temporary Nashville facilities to Franklin.

In preparation of this move, Nissan is requesting that a new number exchange be created for Nissan and 8200 numbers placed in reserve. This exchange will be used for both the Nashville ( NSVLTNMT ) and in 2008 the Franklin ( FKLNTNCC ) location.

Sincerely,



Stephen Lydston  
Manager, Information Technology, Network Services

BellSouth Telecommunications, Inc.  
Petition for Nissan North America, Inc.  
Exhibit E

TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman  
Lyn Greer, Director  
Malvin Malone, Director



460 James Robertson Parkway  
Tennessee MUMS

November 29, 2001

Mc Cheryl Dixon  
Senior Code Administrator  
1800 Sutter Street  
Suite: 570  
Concord, CA 94520

RE: Denial of BellSouth's Central Office Code ("NXX") Assignment Request.

Dear Ms. Dixon:

On November 1, 2001, BellSouth Petitioned the Tennessee Regulatory Authority ("TRA") for Expedited Review of Growth Code Denial by the North American Numbering Plan Administration ("NANPA"), Docket No. 01-00957. BellSouth specifically requested the overturn of NANPA's denial, and order the issue of one growth code ("MX") for the Chattanooga rate center in the 423 NPA.

BellSouth stated they requested a growth code in the 423 NPA in response to a request received from a customer, the University of Tennessee, Chattanooga ("UTC"), as they did not have sufficient numbering resources available to meet the customer's needs. BellSouth's also stated that the Chattanooga Rate Center's Months to Exhaust ("MTV") calculation was 31.88 months.

The TRA Staff ("Staff") verified that the MTE requirement six months cannot be met. Staff also verified that the Chattanooga rate center is a multiple switch rate center, and that the MTE has to be calculated on a rate center level rather than at switch level. Staff is also satisfied with the validity of UTC's request, that the 423 NPA has a projected exhaust date for the 4 Quarter of 2004, and the current demands in the 423 NPA is 2.5 =Cs per month, it is unlikely that the assignment of one (1) NXX will have a material effect on the projected exhaust of the 423 NPA.

On November 20, 2001, the Directors of the Tennessee Regulatory Authority approved BellSouth's petition, and ordered the NANPA to issue BellSouth one growth code in the 423 NPA. The TRA Order will be provided once it is administratively processed.

Sincerely,

A handwritten signature in black ink, appearing to read "Waddell".

K. David Waddell  
Executive Secretary

CC: Brent Struthers, Neater

Telephone (615) 741-2904. Toll-Free 14004424339. Facsimile (615) 7414953  
www.state.tx.us/tra

STATE OF NORTH CAROLINA  
**UTILITIES** COMMISSION  
RALEIGH

DOCKET NO. P-55, SUB 1268

**BEFORE THE NORTH CAROLINA UTILITIES** COMMISSION

In the Matter of  
Petition of BellSouth Telecommunications, Inc.,  
for Review of NANPA Denial of Application  
for Numbering Resources )

**ORDER RULING ON THE  
BELLSOUTH PETITION**

BY THE COMMISSION: On March 6, 2001, BellSouth Telecommunication, Inc. (BellSouth) requested that the Commission review the North American Numbering Plan Administrators (NANPA) decision denying the reservation of two central office codes (MOW) in the 910 and 836 Numbering Plan Areas (NPAs). Reservation of one **NXX** was requested for Guilford County Government and one **NXX** was requested for Coming, Inc., from **NANPA**.

NANPA, in reaching its decision to deny the numbering resources, stated that BellSouth's Month-to-Exhaust worksheet shows that BellSouth has more than **a six month supply of** numbering resources in the two central offices which would be providing services to these customers, respectively. However, BellSouth stated that it does not have in its inventory 10,000 sequential numbers (i.e., one **NXX**) in each NPA available to meet the service requirement for these two customers.

There were no comments filed on this matter before the Commission.

WHEREUPON, the Commission now reaches the following

CONCLUSIONS

After **careful** consideration, the Commission concludes that NeuStar, Inc., as NANPA, should provide BellSouth the numbering resources needed to meet the needs of Guilford County Government and Coming, Inc. The Commission notes that BellSouth, as **a telecommunications** service provider, should be allowed to meet its specific customer requirements. Furthermore, the reservations of numbering resources in this instance represent identifiable **and known** market requirements. The Commission also recognizes that NANPA in reaching its decision must recognize and use industry guidelines to ensure consistent decision-making among **all** industry participants.

IT IS, THEREFORE, ORDERED as follows:

1. That NANPA shall provide BellSouth the numbering resources it needs to meet the service requirements for Guilford County Government and Coming, Inc.

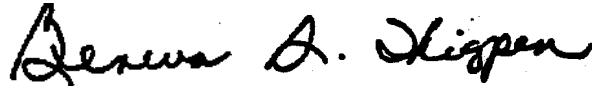
2. That the numbering resources assigned by BellSouth to Guilford County Government and Corning, Inc., shall be done in a sequential numbering manner to optimize these resources.

3. That these numbering resources shall be subject to reclamation if not used within the allowable reservation period according to industry guidelines.

ISSUED BY ORDER OF THE COMMISSION.

This the 10 day of ~~April~~, 2001.

NORTH CAROLINA UTILITIES COMMISSION:

A handwritten signature in black ink, appearing to read "Geneva S. Thigpen".

Geneva S. Thigpen, Chief Clerk

**WARNING:**

*Changes in appearance and in display of formulas, tables, and text may have occurred during translation of this document into an electronic medium. This HTML document may not be an accurate version of the official document and should not be relied on.*

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## BEFORE THE FLORIDA PUBLIC SERVICE

### COMMISSION

In re: Petition for expedited review of North American Plan Administration's (NANPA) denial of application for use of central office code numbering resources or NXX codes in Orlando Magnolia switch by BellSouth Telecommunications, Inc.      DOCKET NO. **010309-TL**  
ORDER NO. **PSC-01-1146-PAA-TL**  
ISSUED: May 21, 2001

**The following Commissioners participated in the disposition of this matter:**

E. LEON JACOBS, JR., Chairman J. TERRY DEASON LILA A. JABER BRAULIO L. BAEZ  
MICHAEL A. PALECKI

**NOTICE OF PROPOSED AGENCY ACTION ORDER DIRECTING NANPA TO PROVIDE BELL SOUTH WITH A GROWTH CODE FOR THE ORLDFLMADS1 SWITCH**

**BY THE COMMISSION:**

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, *Florida Administrative Code*.

- **BACKGROUND**

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On January 24, 2001, BellSouth Telecommunications, Inc. (BellSouth) submitted an application to the North American Numbering Plan Administrator (NANPA) for a central office (NXX) code for the ORLDFLMADS1 switch in the Orlando rate center. The code request was made to fulfill a request made by a specific customer who is in need of 2,500 consecutive Direct Inward. Dialing (DID) numbers in an NXX with a four as the last digit (NX4).

The Orlando rate center consists of six central offices and seven switches [(Azalea Park (ORLDFLAPDS0), Colonial (ORLDFLC LDSO), Magnolia (ORLDFLMADS1 and ORLDFLMA42E), Pinecastle (ORLDFLPCDS0), Pinehills (ORLDFLMADSO), and Sand Lake (ORLDFLSADS0)]. On February 6, 2001, NANPA denied BellSouth's request for a NXX code for the ORLDFLMADS1 switch because BellSouth had not met the rate center **months-to-exhaust** (MTE) criteria currently required to obtain a growth code. On March 9, 2001, BellSouth filed a petition for expedited review of NANPA's denial of its application.

We are vested with jurisdiction pursuant to Sections 364.01 and 364.16(4), *Florida Statutes*, and 47

U.S.C. §151, and 47 C.F.R. §52.15(g)(3)(iv).

## **ANALYSIS**

As mentioned above, BellSouth submitted an application to the NANPA for a **NXX** code for the ORLFLMADS1 switch in the Orlando rate center and was denied because BellSouth had not met the rate center MTE criteria currently required to obtain a growth code. Subsequently, BellSouth submitted a Petition to us for expedite review of NANPA denial of its application. In its prayer for relief, BellSouth requests us to review NANPA's denial and direct NANPA to release a growth code for the **ORLFLMADS1** switch in the Orlando rate center.

Prior to March 31, 2000, carriers submitting an application for a growth code had to certify that existing codes associated with that switch, Point of Interface (POI), or rate center would exhaust within 12 months. In jeopardy Numbering Plan Areas (NPAs), applicants seeking a growth code had to certify that existing NXX codes would exhaust within six months.

Pursuant to Order No. FCC 00-104<sup>1</sup> applicants must now show the MTE criteria by rate center instead of by switch, and have no more than a six-month inventory of telephone numbers. Pursuant to 47 C.F.R. § 52.15(g)(3)(iii):

All service providers shall maintain no more than a six-month inventory of telephone numbers in each rate center or service area in which it provides telecommunications service.

We believe that the new MTE criteria creates a disadvantage for carriers with multiple switch rate centers because it is now based on rate centers, rather than switches. One switch in a multiple-switch rate center may be near exhaust while the average MTE for the rate center is above six months, thus preventing a carrier from obtaining a growth code for the switch near exhaust. For example, at the time of the NANPA denial of BellSouth's code request, the Orlando rate center MTE was 14.74 months with a 76.7% utilization level, while the MTh for the Magnolia-ORLDFLMADS1 switch was four months. BellSouth has stated that "Months-to-Exhaust criteria on a per rate center basis establishes a requirement that is difficult, and in some cases, impossible to meet"

We conclude that the code denial also poses a possible barrier to competition. A customer desiring service from BellSouth may have to turn to another carrier simply because BellSouth cannot meet the MTE rate center requirement. Another carrier who may have just one switch in the rate center, would have an advantage and may be able to obtain a growth code to provide the service. In Order No. DA 01-386<sup>2</sup>, the FCC stated:

Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of 'Report and Order, CC Docket No. 99-200, In the Matter of Number Resource Optimization, Order No. FCC 00-104 (March 31, 2000) 2DA 01-386, CC Docket No. 99-200, CC Docket No. 96-98, In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996 (February 14, 2001) their choice for want of numbering resources.

FCC No. DA 01-386 at 111.

We find that another dilemma created with the new MTh rate center criteria is rate center consolidation. The FCC promotes rate center consolidation as a number conservation measure, and encourages states to consolidate rate centers wherever possible. The problem arises when you attempt to consolidate small rate centers which may have one switch and end up with one rate center with multiple switches. In Order No. FCC 00-429<sup>3</sup>, the FCC states:

Some ILECs suggest, however, that the utilization threshold should be calculated on a per-switch basis in rate centers that have multiple switches, particularly where they have not



deployed LNP capability. According to BellSouth, in the absence of thousands-block number pooling, numbers cannot be shared easily among multiple switches in the same rate center. They assert that there are technical constraints on their ability to share numbering resources among multiple switches within the same rate center and that a low utilization rate in one or more switches could prevent it from meeting the rate center utilization threshold. SBC argues in its comments that the utilization threshold should be calculated at the "lowest code assignment point" the rate center, where there is only one switch, or the switch, where there is more than one in a rate center.

Order No. FCC 00-429 at ¶ 32.

We believe that number pooling may assist in obtaining growth codes in a multiple switch rate center, however, BellSouth cannot support intra-service provider porting between switches until thousands-block pooling is implemented in the Orlando Metropolitan Statistical Area. The 407 NPA currently does not have a pooling trial, but new area code relief for this NPA has already begun with the initial industry planning meeting which took place April 3, 2001. Number pooling for this area, along with other number conservation measures for the 407 NPA, will be examined in that docket.

We note that two other state commissions have addressed NANPA's denial of growth codes. BellSouth included in its petition an order issued by the State of North Carolina Utilities Commission addressing NANPA's denial of two growth codes because BellSouth did not meet the new MTE rate center **requirements**.<sup>4</sup> BellSouth had two large customers, in need of NXX codes. One customer requested 10,000 sequential numbers, and the other customer needed to utilize approximately 6,000 numbers immediately for the establishment of a call center. The North Carolina Commission overturned NANPA's denial of the two NXX codes, and directed NANPA to provide numbers to meet the specific requests of Microsoft and Duke Energy.

The Public Service Commission of Wisconsin addressed a similar issue in its Docket **5-TK-101, Ameritech's Challenge of Neustar's Denial of a Request for a Central Office Growth Code at the Appleton Exchange**, mailed December 22, 2000. In that case, Ameritech was denied a growth code because its **MTE** estimate was 7.4 months based on the rate center criteria, which is above the six month maximum MTE required by 47 C.F.R. § 52.15(g)(3)(iii). Ameritech requested the growth code to fulfill a request by two large customers who each wanted five-digit dialing for internal calls and specifically requested to have an eight *as* the third digit of the NXX code. In <sup>3</sup>Second Report and Order, Order on Reconsideration, CC Docket No. 99- 200 and CC Docket No. 96-98, In the Matter of Numbering Resource Optimization, et. al., Order No. FCC 00-429 (December 29, 2000) <sup>4</sup> State of North Carolina Utilities Commission, Order Granting Reserved Numbers, issued January 16, 2001, in Docket No. P-55, Sub 1250, In the Matter of Petition of BellSouth Telecommunications, Inc. for Review of NANPA Denial of Application for Numbering Resources, its ~~order~~, ~~e~~ **isconsin** PSC overturned **NANPA's decision** to deny a growth code, and directed NANPA to provide Ameritech with a growth code.

A procedure is available to **carriers** who are denied growth codes because of the rate center MTE requirement. Addressing **NXX** growth code denials, 47 C.F.R. § 52.15(g)(3)(iv), states, in part:

The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state regulatory commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.

BellSouth has provided us with the name of the customer requesting the 2,500 codes, copies of its NANPA application for a new growth code, copies of its **MTE** worksheet for the Orlando rate center, and copies of the Part 3 form from NANPA denying the code. We contacted BellSouth's proposed customer via telephone and verified that the customer wants BellSouth as its provider of service. We also verified with NANPA that there would be minimal impact on the 407 NPA by releasing a new growth code for this switch. We also reviewed the BellSouth utilization data for the ORLDFLMADS1 switch in the Orlando rate center to verify that BellSouth has no available codes to meet this specific customer's needs.

In evaluating BellSouth's petition, we have utilized the following factors and concluded that:

- 1) BellSouth has demonstrated that it has a customer in need of numbering resources;
- 2) BellSouth has shown that it is unable to provide services to a potential customer because of NANPA's denial of the NXX code;
- 3) There are potential competitive concerns because of the NANPA code denial since the potential customer cannot choose the provider of his choice; and,
- 4) There would be minimal impact to the 407 NPA by releasing a new growth code.

#### CONCLUSION

Based on the foregoing, we find it appropriate to overturn NANPA's decision to deny a growth code, and direct NANPA to provide BellSouth with a growth code for the ORLDFLMADS1 switch as soon as possible. We also find that once the specific customer needs are met, BellSouth shall keep *as many* of the remaining blocks as possible in the new NXX uncontaminated for future number pooling.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that North American Numbering Plan Administrator shall provide BellSouth Telecommunications, Inc. with a growth code for the ORLDFLMADS1 switch in the Orlando rate center as soon as possible. It is further

ORDERED that BellSouth Telecommunications, Inc. shall maintain as many of the remaining blocks as possible in the new **NXX** uncontaminated for future number pooling once the specific customer needs are met. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective unless an appropriate petition, in the form provided by Rule 25-22.036, *Florida Administrative Code*, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings or Judicial Review" attached hereto. It is further

ORDERED that in the event this Order becomes **final**, this Docket shall be closed.

By ORDER of the Florida Public Service Commission this 21st day of May, 2001.

BLANCA S. **BAYÓ**, Director  
Division of Records and Reporting

By: /s/ Kay Flynn  
Kay Flynn, Chief  
Bureau of Records

*This is a facsimile copy. Go to the Commission's Web site, <http://www.floridapsc.com> or fax a request to 1-850-413-7118, for a copy of the order with signature.*

(SEAL)  
PAC

#### NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), *Florida Statutes*, to notify parties of any administrative hearing that is available under Section 120.57, *Florida Statutes*, as well as

In evaluating BellSouth's petition, we have utilized the following factors and concluded that:

- 1) BellSouth has demonstrated that it has a customer in need of numbering resources;
- 2) BellSouth has shown that it is unable to provide services to a potential customer because of NANPA's denial of the NXX code;
- 3) There are potential competitive concerns because of the NANPA code denial since the potential customer cannot choose the provider of his choice; and,
- 4) There would be minimal impact to the 407 NPA by releasing a new growth code.

#### CONCLUSION

Based on the foregoing, we find it appropriate to overturn NANPA's decision to deny a growth code, and direct NANPA to provide BellSouth with a growth code for the ORLDFLMADS 1 switch as soon as possible. We also find that once the specific customer needs are met, BellSouth shall keep as many of the remaining blocks as possible in the new **NXX** uncontaminated for future number pooling.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that North American Numbering Plan Administrator shall provide BellSouth Telecommunications, Inc. with a growth code for the ORLDFLMADS1 switch in the Orlando rate center *as soon as possible*. It is further

ORDERED that BellSouth Telecommunications, Inc. shall maintain as many of the remaining blocks as possible in the new **NXX** uncontaminated for future number pooling once the specific customer needs are met. It is further

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ORDERED that in the event this Order becomes final, this Docket shall be closed.

By ORDER of the Florida Public Service Commission this 21st day of May, 2001.

BLANCA S. **BAYÓ**, Director  
Division of Records and Reporting

By: /s/ Kay Flynn  
Kay Flynn, Chief  
Bureau of Records

*This is a facsimile copy. Go to the Commission's Web site, <http://www.floridapsc.com> or fax a request to 1-850-413-7118, for a copy of the order with signature.*

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#### NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

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the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, *Florida Administrative Code*. This petition must be received by the Director, Division of Records and Reporting, 2540 **Shumard** Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on June 11, 2001.

In the absence of such a petition, this order **shall become** final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

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**NASHVILLE MAIN WIRE CENTER  
NSVLTNMTDS3**

<b>NPA-NXX</b>	<b>X</b>	<b>Assigned Numbers</b>	<b>Available Numbers</b>	<b>Number Utilization</b>
615-242	0	689	977	70.52%
615-242	1	528	974	54.21%
615-242	2	625	996	62.75%
615-242	3	673	989	68.05%
615-242	4	669	993	67.37%
615-242	5	630	990	63.64%
615-242	6	571	985	57.97%
615-242	7	534	859	62.17%
615-242	8	617	977	63.15%
615-242	9	517	988	52.33%
615-244	0	539	968	55.68%
615-244	1	397	974	40.76%
615-244	2	601	980	61.33%
615-244	3	654	981	66.67%
615-244	4	676	983	68.77%
615-244	5	563	981	57.39%
615-244	6	657	968	67.87%
615-244	7	395	846	46.69%
615-244	8	514	978	52.56%
615-244	9	448	981	45.67%
615-248	0	359	994	36.12%
615-248	1	265	400	66.25%
615-248	2	630	976	64.55%
615-248	3	669	988	67.71%
615-248	4	656	956	68.62%
615-248	5	847	959	88.32%
615-248	6	551	987	55.83%
615-248	7	411	516	79.65%
615-248	8	486	992	48.99%
615-248	9	836	993	84.19%
615-251	0	709	987	71.83%
615-251	1	648	980	66.12%
615-251	2	1,000	1,000	100.00%
615-251	3	718	986	72.82%
615-251	4	659	974	67.66%
615-251	5	963	1,000	96.30%
615-251	6	549	996	55.12%
615-251	7	354	383	92.43%
615-251	8	701	989	70.88%
615-251	9	633	987	64.13%
615-252		999	999	100.00%

**NASHVILLE MAIN WIRE CENTER  
NSVLTNMTDS3**

<b>NPA-NXX</b>		<b>Assigned Numbers</b>	<b>Available Numbers</b>	<b>Number Utilization</b>
615-252	1	908	920	98.70%
615-252	2	910	981	92.76%
615-252	3	944	999	94.49%
615-252	4	795	951	83.60%
615-252	5	1,000	1,000	100.00%
615-252	6	672	919	73.12%
615-252	7	1,000	1,000	100.00%
615-252	8	702	992	70.77%
615-252	9	1,000	1,000	100.00%
615-254	0	514	986	52.13%
615-254	1	549	976	56.25%
615-254	2	578	894	64.65%
615-254	3	535	988	54.15%
615-254	4	529	984	53.76%
615-254	5	578	986	58.62%
615-254	6	537	991	54.19%
615-254	7	475	863	55.04%
615-254	8	636	991	64.18%
615-254	9	436	990	44.04%
615-255	0	520	992	52.42%
615-255	1	477	983	48.52%
615-255	2	540	987	54.71%
615-255	3	521	978	53.27%
615-255	4	580	989	58.65%
615-255	5	606	989	61.27%
615-255	6	555	984	56.40%
615-255	7	520	851	61.10%
615-255	8	438	976	44.88%
615-255	9	473	981	48.22%
615-256	0	509	975	52.21%
615-256	1	533	981	54.33%
615-256	2	533	969	55.01%
615-256	3	504	980	51.43%
615-256	4	583	973	59.92%
615-256	5	566	989	57.23%
615-256	6	564	976	57.79%
615-256	7	319	824	38.71%
615-256	8	476	978	48.67%
615-256	9	377	990	38.08%
615-259	0	465	987	47.11%
615-259	1	714	974	73.31%

**NASHVILLE MAIN WIRE CENTER  
NSVLTNMTDS3**

<b>NPA-NXX</b>		<b>Assigned Numbers</b>	<b>Available Numbers</b>	<b>Number Utilization</b>
615-259	2	615	976	63.01%
615-259	3	538	990	54.34%
615-259	4	640	985	64.97%
615-259	5	878	1,000	87.80%
615-259	6	797	800	99.63%
615-259	7	292	543	53.78%
615-259	8	942	999	94.29%
615-259	9	462	965	47.88%
615-313	0	935	959	97.50%
615-313	1	600	1,000	60.00%
615-313	2	900	1,000	90.00%
615-313	3	969	1,000	96.90%
615-313	4	999	1,000	99.90%
615-313	5	1,000	1,000	100.00%
615-313	6	993	1,000	99.30%
615-313	7	381	939	40.58%
615-313	8	357	992	35.99%
615-313	9	933	1,000	93.30%
615-457	0	0	1,000	0.00%
615-457	1	0	1,000	0.00%
615-457	2	0	1,000	0.00%
615-457	3	0	1,000	0.00%
615-457	4	0	1,000	0.00%
615-457	5	1,000	1,000	100.00%
615-457	6	800	1,000	80.00%
615-457	7	0	1,000	0.00%
615-457	8	0	1,000	0.00%
615-457	9	0	1,000	0.00%
615-507	1	642	849	75.62%
615-507	2	589	942	62.53%
615-507	3	593	699	84.84%
615-507	6	1,000	1,000	100.00%
615-507	7	839	1,000	83.90%
615-664	0	1,000	1,000	100.00%
615-664	1	676	990	68.28%
615-664	2	928	1,000	92.80%
615-664	3	789	998	79.06%
615-664	4	1,000	1,000	100.00%
615-664	5	1,000	1,000	100.00%
615-664	6	740	1,000	74.00%
615-664	7	1,000	1,000	100.00%

**NASHVILLE MAIN WIRE CENTER  
NSVLTNMTDS3**

<b>NPA-NXX</b>		<b>Assigned Numbers</b>	<b>Available Numbers</b>	<b>Number Utilization</b>
615-664	8	1,000	1,000	100.00%
615-664	9	1,000	1,000	100.00%
615-687	0	700	1,000	70.00%
615-687	1	974	1,000	97.40%
615-687	2	980	1,000	98.00%
615-687	3	912	920	99.13%
615-687	4	997	1,000	99.70%
615-687	5	997	1,000	99.70%
615-687	6	590	1,000	59.00%
615-687	7	880	880	100.00%
615-687	8	301	1,000	30.10%
615-687	9	170	960	17.71%
615-726	0	420	979	42.90%
615-726	1	379	981	38.63%
615-726	2	507	991	51.16%
615-726	3	478	986	48.48%
615-726	4	831	996	83.43%
615-726	5	888	957	92.79%
615-726	6	906	990	91.52%
615-726	7	940	1,000	94.00%
615-726	8	639	985	64.87%
615-726	9	1,000	1,000	100.00%
615-742	0	764	977	78.20%
615-742	1	389	972	40.02%
615-742	2	968	999	96.90%
615-742	3	529	981	53.92%
615-742	4	463	691	67.00%
615-742	5	575	960	59.90%
615-742	6	722	995	72.56%
615-742	7	652	717	90.93%
615-742	8	879	993	88.52%
615-742	9	686	980	70.00%
615-743	0	580	620	93.55%
615-743	1	980	980	100.00%
615-743	2	546	554	98.56%
615-743	3	996	1,000	99.60%
615-743	4	1,000	1,000	100.00%
615-743	5	1,000	1,000	100.00%
615-743	6	626	1,000	62.60%
615-743	7	980	980	100.00%
615-743	8	930	1,000	93.00%



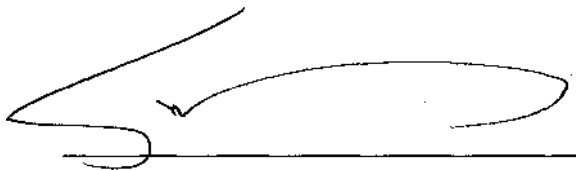
**NASHVILLE MAIN WIRE CENTER  
NSVLTNMTDS3**

<b>N PA-NXX</b>		<b>Assigned Numbers</b>	<b>Available Numbers</b>	<b>Number Utilization</b>
615-743	9	855	900	95.00%
615-744	0	988	1,000	98.80%
615-744	1	1,000	1,000	100.00%
615-744	2	480	1,000	48.00%
615-744	3	920	1,000	92.00%
615-744	4	1,000	1,000	100.00%
615-744	5	1,000	1,000	100.00%
615-744	6	1	1,000	0.10%
615-744	7	900	900	100.00%
615-744	8	651	851	76.50%
615-744	9	1	1,000	0.10%
615-780	0	907	959	94.58%
615-780	1	1,000	1,000	100.00%
615-780	2	761	972	78.29%
615-780	3	765	996	76.81%
615-780	4	939	1,000	93.90%
615-780	5	801	878	91.23%
615-780	6	1,000	1,000	100.00%
615-780	7	857	896	95.65%
615-780	8	1,000	1,000	100.00%
615-780	9	308	961	32.05%
615-782	0	918	997	92.08%
615-782	1	1,000	1,000	100.00%
615-782	2	699	988	70.75%
615-782	3	826	1,000	82.60%
615-782	4	909	1,000	90.90%
615-782	5	1,000	1,000	100.00%
615-782	6	765	989	77.35%
615-782	7	408	592	68.92%
615-782	8	701	957	73.25%
615-782	9	1,000	1,000	100.00%
<b>TOTAL:</b>		<b>130,752</b>	<b>186,613</b>	<b>70.07%</b>

**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2006, a copy of the foregoing document was served on the parties of record, via the method indicated:

<input type="checkbox"/> Hand	Ms. Cheryl Dixon
<input type="checkbox"/> U.S. Mail	Senior Code Administrator
<input type="checkbox"/> Facsimile	Number Pooling Administrator
<input type="checkbox"/> Overnight Mail	1 800 Sutter Street, Suite 570
<input type="checkbox"/> Electronic Mail	Concord, California 94520

A handwritten signature in black ink, appearing to read "Cheryl Dixon", is written over a horizontal line.