

BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

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Joelle J. Phillips
Senior State Operations Counsel

615 214 6311
Fax 615 214 7406

May 23, 2006

VIA HAND DELIVERY

Filed electronically in Docket Office 05/23/06

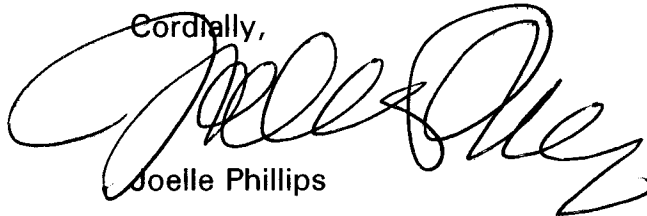
Hon. Ron Jones, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number
Pooling Administrator Relating to Covenant Transport*
Docket No 06-00148

Dear Chairman Jones:

Enclosed are the original and four 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,



Joelle Phillips

JJP 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 Covenant Transport*

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 423 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 Chattanooga 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 May 10, 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 1,000 consecutive DID numbers in the "3" thousands block necessary to meet the demands of its customer, Covenant Transport ("Covenant"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 1,000 consecutive DID numbers in the 423 NPA area code, in response to Covenant request for 1,000 numbers. Covenant cited its desire to implement a coordinated dialing plan as its basis for this request. However, BellSouth did not have sufficient number resources

available within its inventory in the Chattanooga Rate Center, and, accordingly, BellSouth was unable to provide Covenant with sufficient numbers to meet its needs. For this reason, BellSouth sought the numbering resources as noted above.

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 Chattanooga rate center had an MTE of approximately 178 months.

11. Despite the fact that BellSouth's Chattanooga rate center may not exhaust for 178 months, BellSouth is unable to provide the requested service through its switch that serves Covenant within the Chattanooga rate center. This is because the individual switch that serves this customer within the Chattanooga rate center does not have sufficient number resources to meet the customer's request.

12. On or about May 10, 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 Covenant is attached as Exhibit "D").

14. Relief for the 423 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 423 NPA with a Pool Start Date of August 21, 2002. According to NeuStar, based on the 2006 NRUF and NPA Exhaust Analysis – April 30, 2006, the projected exhaust date of the 423 NPA is the 3rd Quarter, 2015. Therefore, granting BellSouth's request for numbering resources would not materially impact exhaustion of available numbers in the 423 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 Chattanooga St. Elmo Central Office is attached hereto as Exhibit "H."

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 Covenant 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 Covenant'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 Covenant's needs, the NeuStar is preventing Covenant 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 the NeuStar to provide the requested numbers to BellSouth to enable BellSouth to meet the specific requirements of Covenant in order that Covenant 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 the NeuStar to provide numbers to BellSouth to meet the specific requirements of Covenant in the Chattanooga rate center within the 423 NPA.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

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

Guy M. Hicks

Joelle Phillips

333 Commerce Street, Suite 2101

Nashville, Tennessee 37201-3300

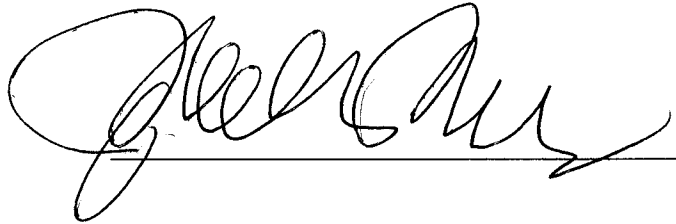
(615) 214-6311

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2006, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☒ U.S. Mail
- ☒ Facsimile
- ☐ Overnight Mail
- ☐ Electronic Mail

Ms. Cheryl Dixon
Senior Code Administrator
Number Pooling Administrator
1800 Sutter Street, Suite 570
Concord, California 94520

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

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

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

Google:

NEUSTAR

- Request For Resources
 - Modify
 - Disconnect
 - Block Transfer
- Confirm Block(s) in Service (Part 4)
- Search Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports

pam.porterfield@bridge.bellsouth.com (SP) [Sign Out](#)

Request Resources

State:

NPA:

Rate Center:

OCN:

Type of Application:

Quantity of Blocks Requested:

NOTE:
If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

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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 CNTL**
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 (205) 977-3025 Fax
E-mail **pam.porterfield@bellsouth.com**

Pooling Administrator :

Contact Name **Ms Genevieve Paulino**
Contact Address **1800 Sutter St. Ste. 700**
City **Concord** State **CA**
Zip **94520**
Telephone (925) 363-7652 Fax (925) 363-7683
E-mail **genevieve.paulino@neustar.biz**

1.2 General Information

LRN Needed **No**

Done Internet

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Google Search

NEU STAR

- Request For Resources
 - Modify
 - Disconnect
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- Submit Forecast
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1.2 General Information

LRN Needed ☐ No
NPA 423 LATA 472
OCN ^{III} 9419-BELLSOUTH SO CNTL
Parent Company OCN * 9419
Number of Thousands-Blocks Requested 1
Switch Identification (Switching Identity/POI) City or Wire Center Name
Rate Center Rate Center Sub Zone

1.3 Dates

Date of Application ^{vi} Wednesday, May 10, 2006
Requested Block Effective Date 2006
Request Expedited Treatment ☐ Yes ☒ No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider
b) Primary type of service Blocks to be used for
c) Thousands-Block(s) (NPA-NXX-X) assignment preference
Click here to see the available blocks in the pool.

NOTE: The blocks available list shows blocks that are available at the time a request is submitted.

Done Internet

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Back Forward Stop Search Favorites Home

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Months to Exhaust and Utilization Certification Worksheet - TN Level

Date **Wednesday, May 10, 2006**
OCN 9419
Company Name **BELLSOUTH SO CNTL**
Rate Center **CHATTANOOGA**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

423-954
423-954
423-954
423-954
423-954
423-954
423-954
423-954
423-954

Name of Block Applicant **Mrs Pam Porterfield**
Title **TN Administration Specialist**
Telephone Number **(205) 977-3025**
Fax Number
E-Mail **pam.porterfield@bellsouth.com**

A. Available Numbers * **122373**
B. Assigned Numbers * **370513**
C. Total Numbering Resources * **518432**
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * **0**

List excluded Code(s) or Block(s)


Question? Enter Us
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Google: Search 351 blocked Check Autoblink AutoFill Options



Request For Resources

- Modify
- Disconnect
- Block Transfer

Confirm Block(s) in Service (Part 4)

Search Forms

Submit Forecast

Create/Modify Forecast

User Profile

Donate Blocks

Reports

E. Growth History - Previous 6 months^{2 *}

Month 1	1172	Month 2	210
Month 3	-1550	Month 4	1434
Month 5	1504	Month 6	1345

F. Forecast - Next 12 months^{3 *}

Month 1	686	Month 2	686
Month 3	686	Month 4	686
Month 5	686	Month 6	686
Month 7	686	Month 8	686
Month 9	686	Month 10	686
Month 11	686	Month 12	686

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

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Explanation

Question? E-mail us
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¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

Internet

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Month 11: 686, Month 12: 686

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 686.000

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	122,373	178.386

I. Utilization⁵ (Assigned Numbers (B) / (Total Numbering Resources (C) - Excluded Numbers (D))) * 100: 71.468

Explanation

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net 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.

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

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

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

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Pooling Administration System

pam.porterfield@bridge.bellsouth.com (SP) [Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to 71.468 percent. The FCC requires a utilization of 75.000 percent.

Select One Option and Submit

☒ Return to the Months To Exhaust Form

☐ Discard all the information provided for the request and start with a fresh Part 1A

☐ State Waiver Option


Done Internet

05/11/2006 07:36

NO. 049 0002

5/03/2006 15:38 FAX 423 822 6072

COVENANT MIS



Covenant Transport

P.O. Box 22997
Chattanooga, TN 37422
423-821-1212

We need the 1000 number DID range to rework our numbering plan. Currently, we have DID numbers in the range of 1, 3, 4, and 7s. We also use 0, 5, 6, 8, and 9 for other functionality in our PBX.

We are planning to implement a coordinated dialing plan company wide in the future, and need to replace the 4 different ranges of DIDs with a single range to give us enough flexibility in the numbering plan to assign extensions to the 19 remote locations.

Jim Webb
Telecommunications Engineer
Covenant Transport, Inc
423-825-3315

TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman
Lynn Greer, Director
Melvin Malone, Director



460 James Robertson Parkway
Nashville, Tennessee 37243-0505

November 29, 2001

Ms. 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 ("NXX") 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 ("MTE") 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. In that the 423 NPA has a projected exhaust date for the 4th Quarter of 2004, and the current demands in the 423 NPA is 2.5 NXXs 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 "K. David Waddell".

K. David Waddell
Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-8953
www.state.tn.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 Administrator's (NANPA) decision denying the reservation of two central office codes (NXXs) 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 Corning, 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 Corning, 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 Corning, Inc.

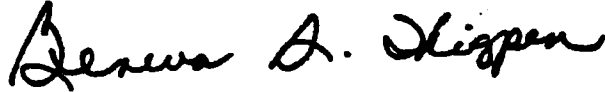
2. That the numbering resources assigned by BellSouth to Guilford County Government and Coming, Inc., shall be done in a sequential numbering manner to optimize these resources.

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 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION:

A handwritten signature in cursive script, reading "Geneva S. Thigpen".

Geneva S. Thigpen, Chief Clerk

0-0001.02

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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**

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 (ORLDFLCLDS0), Magnolia (ORLDFLMADS1 and ORLDFLMA42E), Pinecastle (ORLDFLPCDS0), Pinehills (ORLDFLMADS0), 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 00-104¹ 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 MTE 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 01-386², the FCC stated:

Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of ¹Report 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 ¶11.

We find that another dilemma created with the new MTE 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 00-429³, 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.⁴ 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 ³Second 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) ⁴ 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, the Wisconsin 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.

(S E A L)
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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

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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CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-209	0	0	1,000	1,000	100.00%
423-209	1	371	618	999	61.86%
423-209	2	339	634	991	63.98%
423-209	3	3	600	603	99.50%
423-209	4	100	500	600	83.33%
423-209	5	131	869	1,000	86.90%
423-209	6	0	1,000	1,000	100.00%
423-209	7	7	993	1,000	99.30%
423-209	8	0	1,000	1,000	100.00%
423-209	9	11	988	1,000	98.80%
423-265	0	383	373	889	41.96%
423-265	1	619	271	913	29.68%
423-265	2	185	623	902	69.07%
423-265	3	610	300	935	32.09%
423-265	4	379	458	890	51.46%
423-265	5	603	278	929	29.92%
423-265	6	655	240	935	25.67%
423-265	7	660	238	929	25.62%
423-265	8	622	286	936	30.56%
423-265	9	618	234	909	25.74%
423-266	0	330	554	970	57.11%
423-266	1	341	545	963	56.59%
423-266	2	386	520	964	53.94%
423-266	3	319	596	976	61.07%
423-266	4	335	565	965	58.55%
423-266	5	574	325	931	34.91%
423-266	6	341	495	899	55.06%
423-266	7	575	371	970	38.25%
423-266	8	353	526	956	55.02%
423-266	9	653	280	973	28.78%
423-267	0	217	664	954	69.60%
423-267	1	588	294	923	31.85%
423-267	2	597	294	940	31.28%
423-267	3	605	292	932	31.33%
423-267	4	591	315	939	33.55%
423-267	5	618	286	939	30.46%
423-267	6	663	238	926	25.70%
423-267	7	623	274	929	29.49%
423-267	8	618	278	941	29.54%
423-267	9	588	269	908	29.63%
423-287	0	0	1,000	1,000	100.00%
423-287	1	0	1,000	1,000	100.00%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-287	2	0	1,000	1,000	100.00%
423-287	3	0	1,000	1,000	100.00%
423-287	4	100	900	1,000	90.00%
423-287	5	0	1,000	1,000	100.00%
423-287	6	0	1,000	1,000	100.00%
423-287	7	0	1,000	1,000	100.00%
423-287	8	0	1,000	1,000	100.00%
423-287	9	0	1,000	1,000	100.00%
423-296	0	595	364	988	36.84%
423-296	1	154	789	986	80.02%
423-296	2	193	790	998	79.16%
423-296	3	90	904	1,000	90.40%
423-296	4	62	814	895	90.95%
423-296	5	0	999	1,000	99.90%
423-296	6	130	784	981	79.92%
423-296	7	0	1,000	1,000	100.00%
423-296	8	76	557	686	81.20%
423-296	9	61	887	988	89.78%
423-321	0	286	413	700	59.00%
423-321	1	237	700	937	74.71%
423-321	3	600	391	993	39.38%
423-321	4	0	999	999	100.00%
423-321	5	0	1,000	1,000	100.00%
423-321	6	0	700	900	77.78%
423-321	7	0	1,000	1,000	100.00%
423-321	8	0	1,000	1,000	100.00%
423-321	9	83	911	999	91.19%
423-326	0	178	743	990	75.05%
423-326	1	202	705	995	70.85%
423-326	2	476	487	999	48.75%
423-326	3	348	592	998	59.32%
423-344	0	128	747	993	75.23%
423-344	1	153	729	996	73.19%
423-344	2	138	783	993	78.85%
423-344	3	228	721	997	72.32%
423-344	4	149	750	985	76.14%
423-344	5	126	820	994	82.49%
423-344	6	111	807	987	81.76%
423-344	7	145	811	995	81.51%
423-344	8	121	831	991	83.85%
423-344	9	131	802	995	80.60%
423-386	0	0	1,000	1,000	100.00%

CHATTANOOGA EXCHANGE

NPA- NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-386	1	0	1,000	1,000	100.00%
423-386	2	682	152	895	16.98%
423-386	3	60	900	1,000	90.00%
423-386	4	0	999	999	100.00%
423-386	5	1000	0	1,000	0.00%
423-386	6	0	1,000	1,000	100.00%
423-386	7	0	1,000	1,000	100.00%
423-386	8	0	1,000	1,000	100.00%
423-386	9	0	1,000	1,000	100.00%
423-425	1	612	22	634	3.47%
423-425	2	1000	0	1,000	0.00%
423-425	3	27	742	779	95.25%
423-425	4	936	0	936	0.00%
423-425	5	3	301	304	99.01%
423-425	6	0	900	900	100.00%
423-425	7	369	631	1,000	63.10%
423-425	8	260	1	261	0.38%
423-480	0	0	1,000	1,000	100.00%
423-480	1	0	1,000	1,000	100.00%
423-480	2	0	1,000	1,000	100.00%
423-480	3	0	1,000	1,000	100.00%
423-480	4	0	1,000	1,000	100.00%
423-480	5	0	1,000	1,000	100.00%
423-480	6	0	1,000	1,000	100.00%
423-480	7	0	1,000	1,000	100.00%
423-480	8	0	1,000	1,000	100.00%
423-480	9	0	1,000	1,000	100.00%
423-485	0	35	634	991	63.98%
423-485	1	50	556	967	57.50%
423-485	2	0	500	1,000	50.00%
423-485	3	0	400	1,000	40.00%
423-485	4	0	400	1,000	40.00%
423-485	5	6	812	920	88.26%
423-485	6	0	555	1,000	55.50%
423-485	7	29	80	878	9.11%
423-485	8	557	331	963	34.37%
423-485	9	498	440	957	45.98%
423-490	0	149	664	909	73.05%
423-490	1	39	906	969	93.50%
423-490	2	41	769	817	94.12%
423-490	3	32	918	971	94.54%
423-490	4	189	721	916	78.71%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-490	5	11	977	993	98.39%
423-490	6	0	1,000	1,000	100.00%
423-490	7	0	1,000	1,000	100.00%
423-490	8	20	933	984	94.82%
423-490	9	0	1,000	1,000	100.00%
423-493	0	230	694	991	70.03%
423-493	1	56	899	996	90.26%
423-493	2	526	382	922	41.43%
423-493	3	0	300	1,000	30.00%
423-493	4	80	749	832	90.02%
423-493	5	87	203	376	53.99%
423-493	6	0	1,000	1,000	100.00%
423-493	7	171	785	960	81.77%
423-493	8	48	938	998	93.99%
423-493	9	411	516	978	52.76%
423-495	0	738	180	961	18.73%
423-495	1	210	735	993	74.02%
423-495	2	0	1,000	1,000	100.00%
423-495	3	0	1,000	1,000	100.00%
423-495	4	0	1,000	1,000	100.00%
423-495	5	0	1,000	1,000	100.00%
423-495	6	0	1,000	1,000	100.00%
423-495	7	0	1,000	1,000	100.00%
423-495	8	0	1,000	1,000	100.00%
423-495	9	634	275	919	29.92%
423-499	0	375	513	924	55.52%
423-499	1	69	803	983	81.69%
423-499	2	243	687	967	71.04%
423-499	3	51	888	959	92.60%
423-499	4	54	840	946	88.79%
423-499	5	75	703	913	77.00%
423-499	6	49	850	929	91.50%
423-499	7	0	800	1,000	80.00%
423-499	8	71	592	727	81.43%
423-499	9	115	735	919	79.98%
423-510	0	392	482	926	52.05%
423-510	1	34	859	961	89.39%
423-510	2	200	800	1,000	80.00%
423-510	3	0	1,000	1,000	100.00%
423-510	4	1	940	941	99.89%
423-510	5	0	1,000	1,000	100.00%
423-510	6	0	1,000	1,000	100.00%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-510	7	10	969	979	98.98%
423-510	8	488	395	935	42.25%
423-510	9	520	354	919	38.52%
423-517	0	331	596	997	59.78%
423-517	1	200	1	201	0.50%
423-517	2	500	0	500	0.00%
423-517	5	500	0	500	0.00%
423-517	6	700	0	700	0.00%
423-517	7	100	0	100	0.00%
423-517	8	248	732	999	73.27%
423-517	9	727	149	900	16.56%
423-535	1	0	1,000	1,000	100.00%
423-535	2	0	1,000	1,000	100.00%
423-535	3	0	1,000	1,000	100.00%
423-535	4	0	1,000	1,000	100.00%
423-535	5	0	1,000	1,000	100.00%
423-535	6	0	1,000	1,000	100.00%
423-535	7	0	1,000	1,000	100.00%
423-535	8	0	1,000	1,000	100.00%
423-553	0	576	200	989	20.22%
423-553	1	222	660	930	70.97%
423-553	2	0	1,000	1,000	100.00%
423-553	3	0	1,000	1,000	100.00%
423-553	4	0	1,000	1,000	100.00%
423-553	5	70	710	790	89.87%
423-553	6	281	679	990	68.59%
423-553	7	596	357	964	37.03%
423-553	8	258	663	971	68.28%
423-553	9	706	219	941	23.27%
423-622	0	149	702	970	72.37%
423-622	1	171	687	953	72.09%
423-622	2	199	692	964	71.78%
423-622	3	250	643	974	66.02%
423-622	4	230	658	984	66.87%
423-622	5	107	708	940	75.32%
423-622	6	144	702	934	75.16%
423-622	7	156	737	968	76.14%
423-622	8	108	785	973	80.68%
423-622	9	306	597	962	62.06%
423-624	0	164	712	957	74.40%
423-624	1	438	486	960	50.63%
423-624	2	324	559	942	59.34%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-624	3	443	472	942	50.11%
423-624	4	132	751	963	77.99%
423-624	5	444	488	974	50.10%
423-624	6	124	722	923	78.22%
423-624	7	416	524	976	53.69%
423-624	8	372	549	972	56.48%
423-624	9	318	600	968	61.98%
423-629	0	224	673	976	68.95%
423-629	1	111	776	976	79.51%
423-629	2	234	637	935	68.13%
423-629	3	69	728	806	90.32%
423-629	4	159	701	937	74.81%
423-629	5	373	536	962	55.72%
423-629	6	404	503	953	52.78%
423-629	7	267	627	969	64.71%
423-629	8	62	168	291	57.73%
423-629	9	297	598	971	61.59%
423-634	0	373	398	951	41.85%
423-634	1	262	663	986	67.24%
423-634	2	706	250	976	25.61%
423-634	3	106	831	946	87.84%
423-634	4	317	683	1,000	68.30%
423-634	5	415	540	986	54.77%
423-634	6	68	913	998	91.48%
423-634	7	655	327	995	32.86%
423-634	8	757	210	991	21.19%
423-634	9	318	635	990	64.14%
423-642	0	995	5	1,000	0.50%
423-642	1	998	2	1,000	0.20%
423-642	2	1000	0	1,000	0.00%
423-642	3	999	0	1,000	0.00%
423-642	4	748	19	788	2.41%
423-642	5	580	10	590	1.69%
423-642	6	0	1,000	1,000	100.00%
423-642	7	0	1,000	1,000	100.00%
423-642	8	357	600	996	60.24%
423-642	9	974	20	1,000	2.00%
423-668	0	0	1,000	1,000	100.00%
423-668	1	0	1,000	1,000	100.00%
423-668	2	135	628	796	78.89%
423-668	3	300	500	800	62.50%
423-668	4	500	500	1,000	50.00%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-668	5	456	340	797	42.66%
423-668	6	0	1,000	1,000	100.00%
423-668	7	0	1,000	1,000	100.00%
423-668	8	0	1,000	1,000	100.00%
423-668	9	171	719	900	79.89%
423-697	0	111	754	992	76.01%
423-697	1	217	629	885	71.07%
423-697	2	230	758	995	76.18%
423-697	3	173	781	954	81.87%
423-697	4	232	731	989	73.91%
423-697	5	0	600	1,000	60.00%
423-697	6	3	598	601	99.50%
423-697	7	501	423	960	44.06%
423-697	8	78	857	979	87.54%
423-697	9	350	566	987	57.35%
423-698	0	168	728	967	75.28%
423-698	1	138	761	958	79.44%
423-698	2	243	668	967	69.08%
423-698	3	118	730	917	79.61%
423-698	4	216	644	928	69.40%
423-698	5	97	745	945	78.84%
423-698	6	130	717	932	76.93%
423-698	7	411	525	980	53.57%
423-698	8	148	746	965	77.31%
423-698	9	206	442	747	59.17%
423-751	0	0	1,000	1,000	100.00%
423-751	1	0	1,000	1,000	100.00%
423-751	2	0	1,000	1,000	100.00%
423-751	3	0	1,000	1,000	100.00%
423-751	4	0	1,000	1,000	100.00%
423-751	5	0	1,000	1,000	100.00%
423-751	6	0	1,000	1,000	100.00%
423-751	7	0	1,000	1,000	100.00%
423-751	8	0	1,000	1,000	100.00%
423-751	9	0	1,000	1,000	100.00%
423-752	0	246	715	984	72.66%
423-752	1	172	518	719	72.04%
423-752	2	520	153	687	22.27%
423-752	3	274	653	953	68.52%
423-752	4	227	652	999	65.27%
423-752	5	316	537	887	60.54%
423-752	6	472	486	961	50.57%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-752	7	452	493	952	51.79%
423-752	8	416	487	927	52.54%
423-752	9	438	344	990	34.75%
423-755	0	373	515	920	55.98%
423-755	1	902	57	959	5.94%
423-755	2	455	526	989	53.19%
423-755	3	628	51	990	5.15%
423-755	4	200	799	999	79.98%
423-755	5	106	885	997	88.77%
423-755	6	287	643	945	68.04%
423-755	7	641	248	902	27.49%
423-755	8	749	227	984	23.07%
423-755	9	91	822	919	89.45%
423-756	0	601	348	968	35.95%
423-756	1	244	622	954	65.20%
423-756	2	367	544	966	56.31%
423-756	3	354	567	966	58.70%
423-756	4	490	422	962	43.87%
423-756	5	401	506	965	52.44%
423-756	6	390	438	881	49.72%
423-756	7	218	672	966	69.57%
423-756	8	352	531	960	55.31%
423-756	9	694	256	981	26.10%
423-757	0	180	578	758	76.25%
423-757	1	391	604	999	60.46%
423-757	2	164	825	993	83.08%
423-757	3	0	1,000	1,000	100.00%
423-757	4	136	824	970	84.95%
423-757	5	109	820	937	87.51%
423-757	6	82	116	200	58.00%
423-757	7	286	328	632	51.90%
423-757	8	139	859	1,000	85.90%
423-757	9	391	526	938	56.08%
423-763	0	459	113	576	19.62%
423-763	1	201	728	929	78.36%
423-763	2	0	1,000	1,000	100.00%
423-763	3	0	1,000	1,000	100.00%
423-763	4	56	861	920	93.59%
423-763	5	0	800	800	100.00%
423-763	6	0	400	400	100.00%
423-763	7	0	1,000	1,000	100.00%
423-763	9	583	9	596	1.51%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-778	0	0	1,000	1,000	100.00%
423-778	1	0	1,000	1,000	100.00%
423-778	2	0	1,000	1,000	100.00%
423-778	3	0	1,000	1,000	100.00%
423-778	4	0	1,000	1,000	100.00%
423-778	5	0	1,000	1,000	100.00%
423-778	6	0	1,000	1,000	100.00%
423-778	7	0	1,000	1,000	100.00%
423-778	8	0	1,000	1,000	100.00%
423-778	9	0	1,000	1,000	100.00%
423-785	0	0	978	1,000	97.80%
423-785	1	0	999	999	100.00%
423-785	2	174	625	800	78.13%
423-785	3	45	929	999	92.99%
423-785	4	55	833	1,000	83.30%
423-785	5	25	477	603	79.10%
423-785	8	0	800	800	100.00%
423-785	9	0	900	1,000	90.00%
423-821	0	465	469	985	47.61%
423-821	1	510	413	974	42.40%
423-821	2	454	473	984	48.07%
423-821	3	540	394	973	40.49%
423-821	4	508	438	987	44.38%
423-821	5	555	347	982	35.34%
423-821	6	583	358	984	36.38%
423-821	7	509	410	974	42.09%
423-821	8	498	401	972	41.26%
423-821	9	535	380	980	38.78%
423-822	0	786	157	991	15.84%
423-822	1	663	296	996	29.72%
423-822	3	480	495	994	49.80%
423-822	4	22	978	1,000	97.80%
423-822	6	686	270	989	27.30%
423-822	7	709	255	992	25.71%
423-822	9	641	315	989	31.85%
423-825	0	430	529	989	53.49%
423-825	1	502	447	989	45.20%
423-825	2	148	789	953	82.79%
423-825	3	321	669	990	67.58%
423-825	4	0	1,000	1,000	100.00%
423-825	5	473	473	977	48.41%
423-825	6	541	398	989	40.24%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-825	7	279	705	994	70.93%
423-825	8	0	820	820	100.00%
423-825	9	0	1,000	1,000	100.00%
423-827	0	747	212	997	21.26%
423-827	1	300	700	1,000	70.00%
423-842	0	132	792	982	80.65%
423-842	1	113	817	982	83.20%
423-842	2	103	834	993	83.99%
423-842	3	135	803	981	81.86%
423-842	4	178	769	992	77.52%
423-842	5	136	801	991	80.83%
423-842	6	126	791	986	80.22%
423-842	7	139	788	989	79.68%
423-842	8	153	767	981	78.19%
423-842	9	143	765	983	77.82%
423-843	0	131	789	988	79.86%
423-843	1	119	783	993	78.85%
423-843	2	168	688	993	69.28%
423-843	3	149	772	991	77.90%
423-843	4	273	625	908	68.83%
423-843	5	767	211	996	21.18%
423-843	6	0	1,000	1,000	100.00%
423-843	7	0	1,000	1,000	100.00%
423-843	8	0	1,000	1,000	100.00%
423-843	9	168	751	988	76.01%
423-846	0	0	1,000	1,000	100.00%
423-846	1	0	999	999	100.00%
423-846	2	0	1,000	1,000	100.00%
423-846	3	0	1,000	1,000	100.00%
423-846	4	0	1,000	1,000	100.00%
423-846	5	0	1,000	1,000	100.00%
423-846	6	0	1,000	1,000	100.00%
423-846	7	0	1,000	1,000	100.00%
423-846	8	0	1,000	1,000	100.00%
423-846	9	0	1,000	1,000	100.00%
423-847	0	201	718	996	72.09%
423-847	1	288	629	993	63.34%
423-847	2	912	79	1,000	7.90%
423-847	3	602	375	998	37.58%
423-847	6	537	425	998	42.59%
423-847	8	321	622	994	62.58%
423-847	9	263	662	992	66.73%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-855	0	98	686	877	78.22%
423-855	1	132	666	914	72.87%
423-855	2	132	493	686	71.87%
423-855	3	222	671	938	71.54%
423-855	4	370	526	928	56.68%
423-855	5	90	745	916	81.33%
423-855	6	125	730	874	83.52%
423-855	7	246	631	948	66.56%
423-855	8	110	693	875	79.20%
423-855	9	130	725	916	79.15%
423-867	0	604	333	965	34.51%
423-867	1	307	593	977	60.70%
423-867	2	280	655	980	66.84%
423-867	3	340	584	981	59.53%
423-867	4	296	602	964	62.45%
423-867	5	464	473	981	48.22%
423-867	6	712	250	988	25.30%
423-867	7	262	654	975	67.08%
423-867	8	277	672	990	67.88%
423-867	9	244	592	974	60.78%
423-870	0	111	802	966	83.02%
423-870	1	131	745	962	77.44%
423-870	2	164	727	965	75.34%
423-870	3	214	673	961	70.03%
423-870	4	140	757	975	77.64%
423-870	5	181	701	961	72.94%
423-870	6	543	389	973	39.98%
423-870	7	204	761	984	77.34%
423-870	8	301	590	962	61.33%
423-870	9	262	605	951	63.62%
423-874	0	260	640	964	66.39%
423-874	1	88	851	950	89.58%
423-874	2	0	1,000	1,000	100.00%
423-874	3	0	1,000	1,000	100.00%
423-874	4	0	1,000	1,000	100.00%
423-874	5	0	1,000	1,000	100.00%
423-874	6	0	1,000	1,000	100.00%
423-874	7	0	1,000	1,000	100.00%
423-874	8	0	1,000	1,000	100.00%
423-874	9	0	1,000	1,000	100.00%
423-875	0	184	694	963	72.07%
423-875	1	101	897	998	89.88%

CHATTANOOGA EXCHANGE

NPA- NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-875	2	126	738	965	76.48%
423-875	3	161	701	977	71.75%
423-875	4	154	726	981	74.01%
423-875	5	153	700	960	72.92%
423-875	6	138	754	970	77.73%
423-875	7	0	1,000	1,000	100.00%
423-875	8	113	769	977	78.71%
423-875	9	179	700	967	72.39%
423-876	0	333	576	983	58.60%
423-876	1	699	271	990	27.37%
423-876	2	426	564	997	56.57%
423-876	3	906	82	999	8.21%
423-876	4	558	428	996	42.97%
423-876	5	817	151	994	15.19%
423-876	6	740	241	992	24.29%
423-876	7	373	552	991	55.70%
423-876	8	692	269	981	27.42%
423-876	9	663	278	980	28.37%
423-877	0	125	757	962	78.69%
423-877	1	226	679	961	70.66%
423-877	2	129	756	959	78.83%
423-877	3	179	721	963	74.87%
423-877	4	111	795	961	82.73%
423-877	5	267	642	958	67.01%
423-877	6	140	757	951	79.60%
423-877	7	117	761	955	79.69%
423-877	8	126	779	973	80.06%
423-877	9	177	702	966	72.67%
423-883	8	1	1	2	50.00%
423-886	0	29	862	899	95.88%
423-886	1	110	842	994	84.71%
423-886	2	121	830	984	84.35%
423-886	3	140	817	990	82.53%
423-886	4	112	838	994	84.31%
423-886	5	119	837	993	84.29%
423-886	6	160	794	991	80.12%
423-886	7	153	775	984	78.76%
423-886	9	186	769	997	77.13%
423-892	0	128	748	938	79.74%
423-892	1	89	778	932	83.48%
423-892	2	82	781	919	84.98%
423-892	3	62	799	932	85.73%

CHATTANOOGA EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-892	4	87	759	910	83.41%
423-892	5	76	791	940	84.15%
423-892	6	333	580	946	61.31%
423-892	7	115	766	947	80.89%
423-892	8	117	723	926	78.08%
423-892	9	107	756	952	79.41%
423-893	0	90	753	909	82.84%
423-893	1	20	960	994	96.58%
423-893	2	0	1,000	1,000	100.00%
423-893	3	69	833	928	89.76%
423-893	4	26	743	792	93.81%
423-893	5	85	836	973	85.92%
423-893	6	111	815	980	83.16%
423-893	7	183	682	954	71.49%
423-893	8	95	817	956	85.46%
423-893	9	529	388	948	40.93%
423-894	0	114	733	920	79.67%
423-894	1	94	750	910	82.42%
423-894	2	91	762	912	83.55%
423-894	3	96	779	936	83.23%
423-894	4	107	751	928	80.93%
423-894	5	38	807	919	87.81%
423-894	6	70	769	908	84.69%
423-894	7	107	751	927	81.01%
423-894	8	121	718	921	77.96%
423-894	9	354	527	912	57.79%
423-899	0	113	738	921	80.13%
423-899	1	107	738	906	81.46%
423-899	2	286	598	922	64.86%
423-899	3	114	726	918	79.08%
423-899	4	77	759	915	82.95%
423-899	5	125	692	897	77.15%
423-899	6	151	685	914	74.95%
423-899	7	140	718	925	77.62%
423-899	8	206	634	905	70.06%
423-899	9	98	752	917	82.01%
423-954	0	0	0	1,000	0.00%
423-954	1	352	546	942	57.96%
423-954	2	146	391	571	68.48%
423-954	3	98	632	781	80.92%
423-954	4	0	1,000	1,000	100.00%
423-954	5	0	1,000	1,000	100.00%

CHATTANOOGA EXCHANGE

NPA- NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-954	6	118	874	996	87.75%
423-954	7	0	1,000	1,000	100.00%
423-954	8	228	759	998	76.05%
423-954	9	215	594	912	65.13%
TOTALS:		122,373	370,513	518,434	71.468%