

Voice | Data | Internet | Wireless | Entertainment

|                    |            |
|--------------------|------------|
| <b>PAID T.R.A.</b> |            |
| Chk #              | 0013965858 |
| Amount             | 25.00      |
| Rcvd By            | YS         |
| Date               | 9/14/06    |

**EMBARQ**<sup>TM</sup>

Embarq Corporation  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, NC 27587-5900  
EMBARQ.com

September 13, 2006

Chairman Sara Kyle  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

06-00733

T.R.A. DOCKET ROOM

2006 SEP 14 PM 10:56

Re: United Telephone-Southeast, Inc. d/b/a Embarq's Petition for Expedited Review  
of Central Office Code Denial

Dear Chairman Kyle:

Please find enclosed an original and thirteen (13) copies of United Telephone-Southeast, Inc.'s ("Embarq's") Petition for Expedited Review of Central Office Code Denial. Also enclosed is a check in the amount of \$25.00 to cover the filing fee.

An extra copy of this letter is enclosed. Please date stamp it and return to me in the enclosed self-addressed stamped envelope. Finally, please do not hesitate to contact me if you have any questions concerning this petition.

Sincerely yours,



Edward Phillips

HEP:sm

Enclosures

cc: Laura Sykora  
Dara Sodano

**Edward Phillips**

ATTORNEY

Voice: (919) 554-7870

Fax: (919) 554-7913

edward.phillips@EMBARQ.com

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY

|  |   |                  |
|--|---|------------------|
| In Re:                                       | ) |                  |
|  | ) |                  |
| Petition for Expedited Review of Growth Code | ) | Docket No. _____ |
| Denial by the Number Pooling Administrator   | ) |                  |
| Relating to Edwards & Associates, Inc.       | ) |                  |

---

Petition for Expedited Review of Central Office Code Denial

---

United Telephone-Southeast, Inc. d/b/a Embarq ("Embarq"), 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 Embarq's application for use of central office code numbering resources in the 423 area code.

Embarq respectfully shows the Authority as follows:

1. Embarq is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Bluff City Rate Center.
2. NeuStar is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). *See* 47 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. Various interested parties sought reconsideration of the above-described MTE rule before the FCC on several different 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 August 25, 2006, Embarq 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 a one thousand block necessary to meet the demands of its customer, Edwards & Associates, Inc. The request and worksheet are attached hereto as Exhibits A and B respectively.

8. The code assignment request was for Bluff City in the 423 NPA area code, in response to Edwards & Associates, Inc. request for 300 consecutive numbers. Edwards & Associates, Inc. cited growth as its basis for this request. However, Embarq did not have sufficient number resources available within its inventory in the Bluff City Rate Center, and, accordingly, Embarq was unable to provide Edwards & Associates, Inc. with sufficient numbers to meet its needs. For this reason, Embarq sought the numbering resources as noted above.

9. Embarq 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 Bluff City rate center had an MTE of approximately 24724 months.

11. Despite the fact that Embarq's Bluff City rate center may not exhaust for 24724 months, Embarq is unable to provide the requested service through its switch that serves Edwards & Associates, Inc. within the Bluff City rate center. This is because the individual

switch that serves this customer within the Bluff City rate center does not have sufficient number resources to meet the customer's request. As a result, Embarq needs a 1,000 numbering block to provide numbers to its customers.

12. On or about August 29, 2006, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that Embarq 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 Embarq 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. Embarq's inability to provide this large business customer with the requested numbers prevents Embarq from providing the quality of service this customer desires and expects. A copy of a letter from Edwards & Associates, Inc. seeking numbering resources is attached as Exhibit D.

14. Relief for the 423 NPA was implemented with the start of mandatory dialing on February 26, 1996. The Authority also ordered thousands-block pooling for the 423 NPA with a Pool Start Date of September 16, 2002. According to NeuStar, based on the 2006 and NPA Exhaust Analysis – April 30, 2006, the projected exhaust date of the 423 NPA is the third quarter of 2015. Therefore, granting Embarq'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 Authority has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs. The Authority has ordered NeuStar to provide numbering resources to meet customer service requirements.<sup>1</sup>

17. In reviewing previous petitions, the Authority Staff has requested that petitioning carriers provide additional information concerning number utilization for the specific central office involved in the request. This information for the Bluff City rate center, including the Bluff City Central Office is attached hereto as Exhibit E.

18. 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. Embarq believes that the Authority can more quickly address the numbering problem facing Edwards & Associates, Inc. and Embarq, and, because time is of the essence to the customer, Embarq believes it is appropriate to pursue this matter in the forum that can most quickly address the issue.

19. Under earlier months-to-exhaust procedures used by NeuStar, waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the

---

<sup>1</sup> As a matter of fact, the Authority just approved three such numbering requests for BellSouth Telecommunications, Inc. at its September 11, 2006 Authority Conference. See Docket Nos. 06-00199, 06-0200 and 06-00201.

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 Embarq to meet Edwards & Associates, Inc.'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 Edwards & Associates, Inc.'s needs, the NeuStar is preventing Edwards & Associates, Inc. from obtaining the service of its choice from its carrier of choice, Embarq.

20. Notwithstanding customer need for a specific numbering arrangement, Embarq's analysis indicates that Embarq 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 Embarq's inability to respond to its customer's needs for specific numbering resources.

### **CONCLUSION**

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

WHEREFORE, Embarq requests:

1. The Authority review the decision of the NeuStar to deny Embarq's request for additional numbering resources; and
2. The Authority direct the NeuStar to provide a 1,000 block of numbers to Embarq to meet the specific requirements of Edwards & Associates, Inc. in the Bluff City rate center within the 423 NPA.

Respectfully submitted,



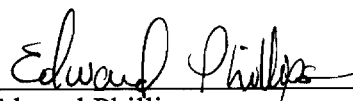
Edward Phillips  
United Telephone-Southeast, Inc. d/b/a Embarq  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900  
Telephone: 919-554-7870  
Fax: 919-554-7913  
edward.phillips@embarq.com  
TN B.P.R. No. 016850

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Petition for Expedited Review of Central Office Code Denial of United Telephone-Southeast, Inc. d/b/a Embarq upon all parties of record by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

Ms. Dara Sodano  
Acting Senior Pooling Administrator  
Number Pooling Administrator  
1800 Sutter Street, Suite 570  
Concord, CA 94520

This 13<sup>th</sup> day of September, 2006.



Edward Phillips  
United Telephone-Southeast, Inc. d/b/a Embarq



Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites Media Print Mail News RSS Feeds

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

Google Search Check Autolink AutoFill Options

## Pooling Administration System

robbie.hanford@embarq.com (SP) Sign Out

### Request Resources

State: TENNESSEE  
NPA: 423  
Rate Center: BLUFF CITY  
OCN: 0567-UNITED INTER-MTN TEL  
Type of Application: Application for Individual Blocks  
Quantity of Blocks Requested: 1

Continue Cancel

**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

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

Legal Notices | Privacy Agreement

Start

Inbox - Mic... MTE-POOL... MTE-POOL... BURDS HT... FW: DID #'s... Pooling Ad... Microsoft Ex... Document1 ...

8:22 AM

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google - Search - Check - Autolink - AutoFill - Options

## Pooling Administration System

robbie.hanford@embarq.com (SP) Sign Out

### Part 1A

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 UNITED INTER MTN TEL  
 Headquarters Address 14111 Capital Blvd  
 City Wake Forest  
 State NC  
 Zip 27587

Contact Name Mr Robert A Hanford  
 Contact Address 14111 Capital Blvd  
 City Wake Forest  
 Zip 27587  
 Telephone (919) 554 5513  
 E-mail robbie.hanford@embarq.com

State NC  
 Fax (919) 554 7461

**Pooling Administrator :**

Contact Name Ms Genevieve Paulino  
 Contact Address 1800 Sutter St, Ste. 780

Question? E-mail: A-1999-2000-NEU-STAR-101  
 Legal Notices | Privacy Agreement

Bluff City: BLUFCITY BLCYTNXAR80 BRSTTNXADS0 JHCYTNXCCA JHCYTNXCG0T

8:39 AM

Inbox - MTE-PO... MTE-PO... BIRADS... FW: DID... Pooling... Microsof... Decume... Code Ro...

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**NEUSTAR**

Request For Resources  
Modify  
Disconnect  
Block Transfer  
Confirm Block(s) in Service (P...  
Search Forms  
Submit Forecast  
Create/Modify Forecast  
User Profile  
Donate Blocks  
Reports

Region: [ ]  
State: [ ]  
Area Code: [ ]

Old Point Det [ ]  
VPA [ ] NOX [ ]  
23 575  
23 391  
23 538

Question? Read on...  
1994-2007 National Pooling  
Legal Notices | Privacy Agreement

**Pooling Administrator:**  
Contact Name Ms Genevieve Paulino  
Contact Address 1800 Sutter St. Ste. 780  
City Concord State CA  
Zip 94520  
Telephone (925) 163 7652 Fax (925) 363 7683  
E-mail genevieve.paulino@neustar.biz

**1.2 General Information**  
LRN Needed " No  
NPA 423 LATA \* 956  
OCN " 0567 UNITED INTER MTN TEL  
Parent Company OCN \* 0470  
Number of Thousands-Blocks Requested 1  
Switch Identification (Switching Ident/MPID) " BLCYTNXARS0 City or Wire Center Name [ ]  
Rate Center \* BLUFF CITY Rate Center Sub Zone [ ]

**1.3 Dates**  
Date of Application " Tuesday, August 29, 2006  
Requested Block Effective Date 29 Sep 2006

BLUFF CITY BLCYTNXARS0 BRSTTNXADS0 JHCYTNXCCA JHCYTNXCC0T

Inbox ... MTE-PO ... MTE-PO ... BIRDS ... FW: DID ... Pooling ... Microsof ... Docume ... Code Ro ...

8:40 AM

Pooling Administration System Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search Check AutoLink AutoFill Options

**NEU STAR**

Request For Resources

Modify

Disconnect

Block Transfer

Confirm Block(s) in Service (Part)

Search Forms

Submit Forecast

Create/Modify Forecast

User Profile

Donate Blocks

Reports

Region: I

State:

Area Code:

City/Point Det:

VPA NXX I

23 575

23 391

23 538

BLUFF CITY BLCYTNXAR60 BRSTTNXAD80 JHCYTNXCCA1JHCYTNXC60T

Start

Inbox - ... MTE-PO... MTE-PO... BRADS ... FW: DID... Pooling ... Microsc... Docume... Code Ro...

6:40 AM

**1.3 Dates**

Date of Application " Tuesday, August 29, 2006

Requested Block Effective Date 29 Sep 2006

Request Expedited Treatment ☐ Yes ☒ No

**1.4 Type of Service Provider Requesting the Thousands-Block**

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

b) Primary type of service blocks to be used for " Wireline

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. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available

d) Thousands-Block(s) (NPA-NXX-X) that are

423-391-3

423-391-4

423-391-5

Delete

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**NEU STAR**

d) Thousands-Block(s) (NPA-XXX-X) that are undesirable for this assignment, if any

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

**1.5 Type of Request**

Initial block for rate center ☐ Yes  
Growth block for rate center ☒ Yes  
Change block N/A  
Disconnect block N/A

I hereby certify that the above information requesting an XXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (XXX-X) Pooling Administration Guidelines (ATIS-0300066)

Continue Cancel

**Instructions for filling out each Section of the Part 1A form:**  
Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the

Region: State: Area Code: Code Point Data

NPA NXX

23 575

23 391

23 538

BLUFF CITY BLCYTNXARS0 BRSTTNXADS0 JHCYTNXCCA1JHCYTNXCG0T

8:40 AM

Inbox MTE-PO... MTE-PO... BIRDS... PW: DID... Pooling... Microsoft... Docume... Code Ro...

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**Pooling Administration System**

robbie.hanford@embarq.com (SF) Sign Out

**Months to Exhaust and Utilization Certification Worksheet TN Level**

Date Tuesday, August 29, 2006  
OCN 0567  
Company Name UNITED INTER MTN TEL  
Rate Center BLUFF CITY

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

423-538, 423-391-0, 423-391-1.

Name of Block Applicant Mr Robert A Hanford  
Title Network Engineer II  
Telephone Number (319) 554-5513  
Fax Number (319) 554-7461  
E-Mail robbie.hanford@embarq.com

A. Available Numbers \* 4129  
B. Assigned Numbers \* 7871

Request For Resources  
Modify  
Disconnect  
Block Transfer  
Confirm Block(s) in Service (Part)  
Search Forms  
Submit Forecast  
Create/Modify Forecast  
User Profile  
Delete Blocks  
Reports

Microsoft  
New  
Reply  
Was sent to  
Cooper, C  
hanford, Rob  
MTE

Done

Internet

Start

Inbox - M... MTE-POO... MTE-POO... BIRDS H... FW: DID... Pooling A... Microsoft ... Document... Code Rou...

8:46 AM

Pooling Administration System Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**NEOSTAR**

Request For Resources  
Modify  
Disconnect  
Block Transfer  
Confirm Block(s) in Service (Part)  
Search Forms  
Submit Forecast  
Create/Modify Forecast  
User Profile  
Donate Blobs  
Reports

A Available Numbers \* 4129  
B Assigned Numbers \* 7871  
C Total Numbering Resources \* 12000  
D Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation 0

List excluded Codes(s) or Block(s)

E Growth History - Previous 6 months<sup>2</sup> \*

|         |   |         |   |
|---------|---|---------|---|
| Month 1 | 0 | Month 2 | 0 |
| Month 3 | 0 | Month 4 | 0 |
| Month 5 | 0 | Month 6 | 1 |

F Forecast - Next 12 months<sup>3</sup> \*

|         |   |         |   |
|---------|---|---------|---|
| Month 1 | 1 | Month 2 | 0 |
| Month 3 | 0 | Month 4 | 0 |

Cooper, C  
lanford, Rob  
MTF

Legal Notices | Privacy Agreement

Internet

Inbox - M... MTE-POO... MTE-POO... BURADS H... FW: DID ... Pooling A... Microsoft ... Document... Code Rou...

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**NEU STAR**

Request For Resources

Modify

Disconnect

Block Transfer

Confirm Block(s) in Service (Part)

Search Forms

Submit Forecast

Create/Modify Forecast

User Profile

Donate Blocks

Reports

Edwards

View

Reply

was sent

Cooper, Sanford, Ro

MIT

Question: Email to: 20140527077 NeuStar Inc. Legal Notices | Privacy Agreement

F Forecast - Next 12 months<sup>3</sup>

|          |   |          |   |
|----------|---|----------|---|
| Month 1  | 1 | Month 2  | 0 |
| Month 3  | 0 | Month 4  | 0 |
| Month 5  | 0 | Month 6  | 0 |
| Month 7  | 0 | Month 8  | 0 |
| Month 9  | 0 | Month 10 | 0 |
| Month 11 | 0 | Month 12 | 0 |

G Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 0.167

H Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

| Block Requested | A. Available Numbers | H. Months to Exhaust |
|-----------------|----------------------|----------------------|
| 1               | 4129                 | 24724.551            |

I Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 65.592

Explanation

THIS REQUEST IS FOR A DEDICATED 1K BLOCK BEING ASSIGNED TO EDWARDS & ASSOCIATES.

100% Normal + Arial 10

Start

Inbox - M... MTE-POO... MTE-POO... BIRDS H... FW: DID ... Pooling A... Microsoft ... Document... Code Rou...



Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

**NEUSTAR**

Request For Resources

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

Edwards

View Info

Reply

Was sent

Cooper, C

lanford, Rob

MTE

Question? Email at: 713904.0095@MTE.com

Legal Notices | Privacy Agreement

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 0.167

H. Months to Exhaust <sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

| Block Requested | A. Available Numbers | H. Months to Exhaust |
|-----------------|----------------------|----------------------|
| 1               | 4129                 | 24724.551            |

I. Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 65.592

Explanation

THIS REQUEST IS FOR A DEDICATED 1K BLOCK BEING ASSIGNED TO EDWARDS & ASSOCIATES.

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

<sup>2</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

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

<sup>4</sup>To 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)).

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

Show Calculations Continue Cancel

Internet

Start

Inbox - MTE-POO... MTE-POO... BIRDS H... FW: DID ... Pooling A... Microsoft ... Document ... Code Rou...

8:53 AM

Pooling Administration System - Microsoft Internet Explorer provided by Sprint

File Edit View Favorites Tools Help

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

Google Search

## Pooling Administration System

robbie.hanford@embarq.com (SP) Sign Out

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

Your utilization calculates to 65.592 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

Submit Cancel

NEU STAR

Request For Resources

- Modify
- Disconnect
- Block Transfer

Confirm Block(s) in Service (Part 1A)

Search Forms

Submit Forecast

Create/Modify Forecast

User Profile

Donate Blocks

Reports

Question? Feedback

Legal Notices | Privacy Agreement

Done

Internet

Start

Inbox - M... MTE-POO... MTE-POO... BIRROS H... FW: DID ... Pooling A... Microsoft ... Document... Code Rou...

8:41 AM

Melissa K. Hubbard  
IT Manager  
Edwards & Associates, Inc.  
PO Box 3689  
Bristol, TN 37625

September 6, 2006

Carren Cooper  
Account Manager  
Embarq

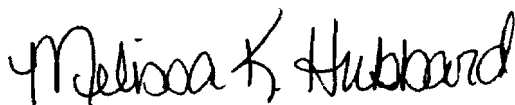
Dear Carren:

Due to our companies growth and expansion, we are in need of a block of 300 DID #s for our company. Please obtain a block of numbers with the following leading digits:

- 3XXX
- 4XXX
- 6XXX
- 7XXX

I appreciate your assistance with this matter. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Melissa K. Hubbard". The signature is written in a cursive, flowing style.

Melissa K. Hubbard  
IT Manager

## Bluff City, Tennessee

| NPA-NXX | X | Rate Center<br>Abbreviation | Assigned | Inter-<br>mediate | Reserved | Aging | Admin | Donated<br>to Pool? | Notes/ Assignee | Available | Utilization |
|---------|---|-----------------------------|----------|-------------------|----------|-------|-------|---------------------|-----------------|-----------|-------------|
| 423-391 | 0 | BLUFF CITY                  | 343      | 0                 | 0        | 221   | 0     |                     |                 | 436       | 34.30%      |
| 423-391 | 1 | BLUFF CITY                  | 384      | 0                 | 0        | 60    | 0     |                     |                 | 556       | 38.40%      |
| 423-391 | 2 | BLUFF CITY                  | 0        | 0                 | 0        | 0     | 0     | X                   |                 | 1000      | Donated     |
| 423-391 | 3 | BLUFF CITY                  | 0        | 0                 | 0        | 0     | 0     | X                   |                 | 1000      | Donated     |
| 423-391 | 4 | BLUFF CITY                  | 28       | 0                 | 0        | 0     | 0     | X                   |                 | 972       | Donated     |
| 423-391 | 5 | BLUFF CITY                  | 1        | 0                 | 0        | 0     | 0     | X                   |                 | 999       | Donated     |
| 423-391 | 6 | BLUFF CITY                  | 1        | 0                 | 0        | 0     | 0     | X                   |                 | 999       | Donated     |
| 423-391 | 8 | BLUFF CITY                  | 23       | 0                 | 0        | 0     | 0     | X                   |                 | 977       | Donated     |
| 423-391 | 9 | BLUFF CITY                  | 29       | 0                 | 0        | 0     | 0     | X                   |                 | 971       | Donated     |
| 423-538 | 0 | BLUFF CITY                  | 718      | 0                 | 0        | 104   | 0     |                     |                 | 178       | 71.80%      |
| 423-538 | 1 | BLUFF CITY                  | 325      | 0                 | 0        | 78    | 0     |                     |                 | 597       | 32.50%      |
| 423-538 | 2 | BLUFF CITY                  | 54       | 0                 | 0        | 0     | 0     |                     |                 | 946       | 5.40%       |
| 423-538 | 3 | BLUFF CITY                  | 628      | 0                 | 0        | 137   | 0     |                     |                 | 235       | 62.80%      |
| 423-538 | 4 | BLUFF CITY                  | 932      | 0                 | 0        | 19    | 0     |                     |                 | 49        | 93.20%      |
| 423-538 | 5 | BLUFF CITY                  | 876      | 0                 | 0        | 57    | 0     |                     |                 | 67        | 87.60%      |
| 423-538 | 6 | BLUFF CITY                  | 964      | 0                 | 0        | 12    | 1     |                     |                 | 23        | 96.40%      |
| 423-538 | 7 | BLUFF CITY                  | 921      | 0                 | 0        | 35    | 0     |                     |                 | 44        | 92.10%      |
| 423-538 | 8 | BLUFF CITY                  | 918      | 0                 | 0        | 29    | 0     |                     |                 | 53        | 91.80%      |
| 423-538 | 9 | BLUFF CITY                  | 535      | 0                 | 0        | 163   | 0     |                     |                 | 302       | 53.50%      |