

BellSouth Telecommunications, Inc.

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Guy M. Hicks
General Counsel

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September 28, 2006

VIA HAND DELIVERY

filed electronically in docket office on 09/28/06

Hon. Sara Kyle, 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 Pilot Corporation.*
Docket No 06-00246

Dear Chairman Kyle:

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 Pilot Corporation*

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 865 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 Knoxville 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 September 26, 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 1,500 consecutive numbers necessary to meet the demands of its customer, Pilot Corporation ("Pilot"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for two thousand-number blocks in the 865 NPA area code, in response to Pilot request for 1,500 consecutive numbers in 2000-2500 range numbers. Pilot cited the implementation of a corporate dialing plan as its basis for this request. However, BellSouth did not

have sufficient number resources available within its inventory in the Knoxville Rate Center, and, accordingly, BellSouth was unable to provide Pilot 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 Knoxville rate center had an MTE of approximately 63 months.

11. Despite the fact that BellSouth's Knoxville rate center may not exhaust for 63 months, BellSouth is unable to provide the requested service through its switch that serves Pilot within the Knoxville rate center. This is because the individual switch that serves this customer within the Knoxville rate center does not have sufficient number resources to meet the customer's request.

12. On or about September 26, 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 Pilot is attached as Exhibit "D").

14. Relief for the 865 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 865 NPA with a Pool Start Date of August 21, 2002. According to NeuStar, based on the 2006 NRUF and NPA Exhaust Analysis dated April 30, 2006, the projected exhaust date of the 865 NPA is the Third Quarter 2024. Therefore, granting BellSouth's request for numbering resources would not materially impact exhaustion of available numbers in the 865 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 Knoxville, including the KNVLTNBEDSO 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 Pilot 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 Pilot'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 Pilot's needs, the NeuStar is preventing Pilot 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 Pilot in order that Pilot may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

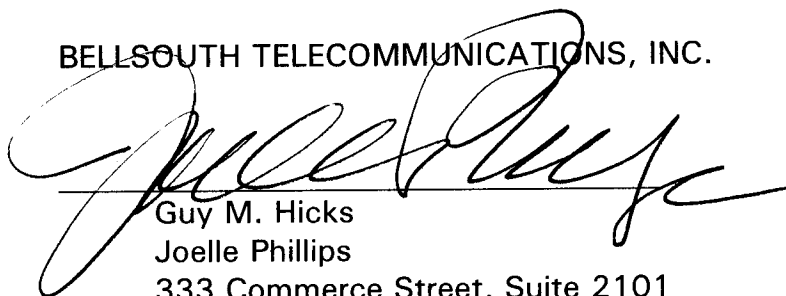
WHEREFORE, BellSouth requests:

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 Pilot in the Knoxville rate center within the 865 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

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Pooling Administration System

Request For Resources

Request For Resources

Modify

Disconnect

Block Transfer

Confirm Block(s) in Service (F)

Search Forms

Submit Forecast

User Profile

Donate Blocks

Reports

State: TENNESSEE

NPA: 665

Rate Center: KNOXVILLE

OCN: 9419-BELLSOUTH SO CNTL

Type of Application: Application for Individual Blocks

Quantity of Blocks Requested: 2

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.

Sign Out

Done

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- Lloyd Wood Middle School
- Ligon number manager
- Ligon order path
- MSN
- MTR - Non-Management P...
- NeuStar Number Pool Ad...
- Number Manager
- ORBIT Customer Markets ...
- Order Path
- PAWS Documents & Reso...
- PawsWeb -- South Centra...
- PawsWeb -- Southern Bell
- Radio Station Guide
- Regional ESP Schedules
- SIGN ON
- switch.west.bst.bls.coms...
- SWITCH-EAST
- SWITCH-FOMS
- SWITCH-ga-nc-sc
- SWITCH-west
- SWprod01.bst.bls.com
- TN Tracker - South Centr...
- TN Tracker - Southern Bell

NEU STAR

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

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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 **BELL SOUTH SO CNL**
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. 780**
City: **Concord** State: **CA**
Zip: **94520**
Telephone: **(925) 363-7652** Fax: **(925) 363-7683**
E-mail: **genevieve.paulino@neustar.biz**

1.2 General Information

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Request For Resources
 Modify
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 Submit Forecast
 Create/Modify Forecast
 User Profile
 Donate Blocks
 Reports

1.2 General Information

LRN Needed ☒ No
 NPA 865 LATA * 474
 OCN ☒ 9419-BELLSOUTH SO CNTL
 Parent Company OCN * 9419
 Number of Thousands-Blocks Requested 2
 Switch Identification (Switching Identity/POT) ☒ KNVLTNBEDS0 City or Wire Center Name
 Rate Center * KNOXVILLE Rate Center Sub Zone

1.3 Dates

Date of Application ☒ Tuesday, September 26, 2006
 Requested Block Effective Date 27 Oct 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 *
 c) Thousands-Block(s) (NPA-NXX-X) assignment preference
 Click here to see the available blocks in the

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Infrastructure Planning H...
It's... The Mark & Mack S...
Lloyd Wood Middle School
Logon number manager
Logon order path
MSN
MTR - Non-Management P...
NeuStar Number Pool Ad...
Number Manager
ORBIT Customer Markets ...
Order Path
PAWS Documents & Reso...
PawsWeb -- South Centra...
PawsWeb -- Southern Bell
Radio Station Guide
Regional ESP Schedules
SIGN ON
switch.west.bst.bls.coms...
SWITCH-EAST
SWITCH-FOMS
SWITCH-ga-nc-sc
SWITCH-west
SWprod01.bst.bls.com
TN Tracker - South Centr...
TN Tracker - Southern Bell

NEU STAR

- Request For Resources
 - Modify
 - Disconnect
 - Block Transfer
- Confirm Block(s) in Service (f)
- Search Forms
- Submit Forecast
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- Reports

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.

			865-622-2 865-622-3 Delete
			Delete

d) Thousands-Block(s) (NPA-NXX-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

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1099-0360 NeuStar, Inc.
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Months to Exhaust and Utilization Certification Worksheet - TN Level 1

NEU STAR

- 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

Date Tuesday, September 26, 2006
OCN 9419
Company Name BELL SOUTH SO CNTL
Rate Center KNOXVILLE

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

865-985
865-985
865-985
865-985
865-985
865-985
865-985
865-985
865-985

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 * 118411
B. Assigned Numbers * 402059
C. Total Numbering Resources * 55161
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * 0

List excluded Code(s) or Block(s)

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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

Month 1	2311	Month 2	1372
Month 3	1220	Month 4	1407
Month 5	2632	Month 6	2448

F. Forecast - Next 12 months³ *

Month 1	1898	Month 2	1898
Month 3	1898	Month 4	1898
Month 5	1898	Month 6	1898
Month 7	1898	Month 8	1898
Month 9	1898	Month 10	1898
Month 11	1898	Month 12	1898

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 1898.000

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	118411	62.387
2	119411	62.914

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 72.422

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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 72.422 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

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BellSouth Telecommunications, Inc.
Pilot Corporation
Exhibit D

September 19, 2006

BellSouth

To whom it may concern:

Pilot Corporation is requesting a block of telephone numbers from the Bearden Central Office that are in a range of 865-xxx-2000 to 865-xxx-3500. This requested range is the only range that will work within the corporate dialing plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Massengill", with a large, sweeping flourish at the end.

Bob Massengill
Pilot Travel Centers LLC
Manager of Infrastructure and Production Services
Office 865-588-7488 x 2357
Cell 865-712-5634
Fax 865-297-1972

TENNESSEE REGULATORY AUTHORITY



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

460 James Robertson Parkway
Nashville, Tennessee 37243-0303

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 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 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION



Geneva S. Thigpen, Chief Clerk

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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
BELLSOUTH 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 (ORLDLAPDS0), Colonial (ORLDLCLDS0), Magnolia (ORLDLFLMADS1 and ORLDLFLMA42E), Pinecastle (ORLDLFLPCDS0), Pinehills (ORLDLFLMADS0), and Sand Lake (ORLDLFLSADS0)]. On February 6, 2001, NANPA denied BellSouth's request for a NXX code for the ORLDLFLMADS1 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)
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

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BLANCA S. BAYÓ, Director
Division of Records and Reporting

By: /s/ Kay Flynn
Kay Flynn, Chief
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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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KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-212	0	64	902	987	91.388%
865-212	1	0	1,000	1,000	100.000%
865-212	2	45	946	996	94.980%
865-212	3	530	243	821	29.598%
865-212	4	464	465	941	49.416%
865-212	5	67	897	975	92.000%
865-212	6	6	606	613	98.858%
865-212	7	0	386	386	100.000%
865-212	8	0	1,000	1,000	100.000%
865-212	9	125	829	977	84.852%
865-215	0	0	1,000	1,000	100.000%
865-215	1	28	872	900	96.889%
865-215	2	0	1,000	1,000	100.000%
865-215	3	0	1,000	1,000	100.000%
865-215	4	0	1,000	1,000	100.000%
865-215	5	0	1,000	1,000	100.000%
865-215	6	0	900	1,000	90.000%
865-215	7	0	1,000	1,000	100.000%
865-215	8	0	1,000	1,000	100.000%
865-215	9	19	966	991	97.477%
865-219	0	552	353	940	37.553%
865-219	1	0	900	1,000	90.000%
865-219	2	0	900	1,000	90.000%
865-219	3	0	1,000	1,000	100.000%
865-219	4	2	897	1,000	89.700%
865-219	5	103	896	1,000	89.600%
865-219	6	217	754	987	76.393%
865-219	7	103	777	955	81.361%
865-219	8	585	326	955	34.136%
865-219	9	567	339	937	36.179%
865-226	0	0	1,000	1,000	100.000%
865-226	1	0	1,000	1,000	100.000%
865-226	2	1	999	1,000	99.900%
865-226	3	0	1,000	1,000	100.000%
865-226	4	0	1,000	1,000	100.000%
865-226	5	1	999	1,000	99.900%
865-226	6	0	1,000	1,000	100.000%
865-226	7	0	1,000	1,000	100.000%
865-226	8	0	1,000	1,000	100.000%
865-226	9	0	1,000	1,000	100.000%
865-281	0	170	649	918	70.697%
865-281	1	0	1,000	1,000	100.000%
865-281	2	111	756	942	80.255%
865-281	3	0	1,000	1,000	100.000%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-281	4	83	824	908	90.749%
865-281	5	192	704	999	70.470%
865-281	6	44	935	994	94.064%
865-281	7	494	345	963	35.826%
865-281	8	95	736	923	79.740%
865-281	9	496	403	934	43.148%
865-329	0	669	271	986	27.485%
865-329	1	60	931	995	93.568%
865-329	2	128	525	988	53.138%
865-329	3	504	412	944	43.644%
865-329	4	677	309	996	31.024%
865-329	5	112	887	1,000	88.700%
865-329	8	455	531	997	53.260%
865-329	9	424	527	990	53.232%
865-330	0	121	522	659	79.211%
865-330	1	59	801	880	91.023%
865-330	2	234	698	974	71.663%
865-330	3	124	862	990	87.071%
865-330	4	0	1,000	1,000	100.000%
865-330	5	0	1,000	1,000	100.000%
865-330	6	14	982	999	98.298%
865-330	7	397	600	1,000	60.000%
865-330	8	585	415	1,000	41.500%
865-330	9	782	141	966	14.596%
865-373	0	0	1,000	1,000	100.000%
865-373	1	0	1,000	1,000	100.000%
865-373	2	0	1,000	1,000	100.000%
865-373	3	0	1,000	1,000	100.000%
865-373	4	0	1,000	1,000	100.000%
865-373	5	0	0	1,000	0.000%
865-373	6	0	0	1,000	0.000%
865-373	7	0	1,000	1,000	100.000%
865-373	8	0	0	1,000	0.000%
865-373	9	0	0	1,000	0.000%
865-374	0	139	861	1,000	86.100%
865-374	1	0	1,000	1,000	100.000%
865-374	2	0	1,000	1,000	100.000%
865-374	3	299	690	1,000	69.000%
865-374	4	201	799	1,000	79.900%
865-374	5	0	1,000	1,000	100.000%
865-374	6	0	1,000	1,000	100.000%
865-374	7	600	400	1,000	40.000%
865-374	8	0	1,000	1,000	100.000%
865-374	9	0	1,000	1,000	100.000%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-403	0	979	4	999	0.400%
865-403	1	139	361	500	72.200%
865-403	3	0	1,000	1,000	100.000%
865-403	4	0	1,000	1,000	100.000%
865-403	5	0	1,000	1,000	100.000%
865-403	6	0	1,000	1,000	100.000%
865-403	7	0	1,000	1,000	100.000%
865-403	8	0	1,000	1,000	100.000%
865-437	0	0	1,000	1,000	100.000%
865-437	1	0	1,000	1,000	100.000%
865-437	2	0	1,000	1,000	100.000%
865-437	3	0	1,000	1,000	100.000%
865-437	4	0	1,000	1,000	100.000%
865-450	0	0	1,000	1,000	100.000%
865-450	1	110	821	938	87.527%
865-450	2	154	736	909	80.968%
865-450	3	75	892	986	90.467%
865-450	4	48	947	999	94.795%
865-450	5	311	595	982	60.591%
865-450	6	0	1,000	1,000	100.000%
865-450	7	0	1,000	1,000	100.000%
865-450	8	69	894	977	91.505%
865-450	9	548	332	917	36.205%
865-470	0	68	834	936	89.103%
865-470	1	392	608	1,000	60.800%
865-470	2	191	637	885	71.977%
865-470	3	360	528	913	57.831%
865-470	4	73	566	659	85.888%
865-470	5	21	978	999	97.898%
865-470	6	0	1,000	1,000	100.000%
865-470	7	175	706	917	76.990%
865-470	8	240	574	891	64.422%
865-470	9	213	561	850	66.000%
865-521	0	261	570	869	65.593%
865-521	1	308	645	960	67.188%
865-521	2	191	792	991	79.919%
865-521	3	157	314	997	31.494%
865-521	4	97	273	987	27.660%
865-521	5	59	738	818	90.220%
865-521	6	255	574	915	62.732%
865-521	7	235	571	934	61.135%
865-521	8	87	844	959	88.008%
865-521	9	399	491	935	52.513%
865-522	0	226	596	942	63.270%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-522	1	288	633	953	66.422%
865-522	2	221	650	933	69.668%
865-522	3	206	650	913	71.194%
865-522	4	383	519	954	54.403%
865-522	5	329	566	946	59.831%
865-522	6	199	647	912	70.943%
865-522	7	363	538	935	57.540%
865-522	8	353	546	941	58.023%
865-522	9	515	363	924	39.286%
865-523	0	400	481	921	52.226%
865-523	1	282	574	917	62.595%
865-523	2	357	533	923	57.746%
865-523	3	537	378	941	40.170%
865-523	4	325	605	954	63.417%
865-523	5	363	548	946	57.928%
865-523	6	364	532	935	56.898%
865-523	7	372	494	944	52.331%
865-523	8	355	533	933	57.128%
865-523	9	203	627	914	68.600%
865-524	0	259	605	929	65.124%
865-524	1	365	531	920	57.717%
865-524	2	381	509	921	55.266%
865-524	3	256	554	867	63.899%
865-524	4	226	632	932	67.811%
865-524	5	229	627	905	69.282%
865-524	6	266	654	964	67.842%
865-524	7	365	534	929	57.481%
865-524	8	538	403	956	42.155%
865-524	9	628	300	942	31.847%
865-525	0	235	538	902	59.645%
865-525	1	212	639	919	69.532%
865-525	2	221	583	893	65.286%
865-525	3	251	589	908	64.868%
865-525	4	203	650	934	69.593%
865-525	5	365	542	940	57.660%
865-525	6	354	549	926	59.287%
865-525	7	206	659	941	70.032%
865-525	8	221	609	936	65.064%
865-525	9	200	580	911	63.666%
865-531	0	189	599	864	69.329%
865-531	1	155	626	849	73.734%
865-531	2	228	567	851	66.627%
865-531	3	231	562	852	65.962%
865-531	4	524	341	894	38.143%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-531	5	725	211	965	21.865%
865-531	6	151	736	925	79.568%
865-531	7	140	646	859	75.204%
865-531	8	211	598	864	69.213%
865-531	9	109	585	756	77.381%
865-539	0	170	618	861	71.777%
865-539	1	166	607	841	72.176%
865-539	2	219	547	880	62.159%
865-539	3	350	496	889	55.793%
865-539	4	192	581	861	67.480%
865-539	5	260	420	938	44.776%
865-539	6	161	622	869	71.577%
865-539	7	8	289	298	96.980%
865-539	8	54	788	950	82.947%
865-539	9	167	598	837	71.446%
865-540	0	17	978	1,000	97.800%
865-540	1	214	574	840	68.333%
865-540	2	300	700	1,000	70.000%
865-540	3	88	874	988	88.462%
865-540	4	134	777	963	80.685%
865-540	5	9	571	900	63.444%
865-540	6	0	985	985	100.000%
865-540	7	181	239	520	45.962%
865-540	8	392	414	953	43.442%
865-540	9	25	963	998	96.493%
865-541	0	0	999	1,000	99.900%
865-541	1	0	1,000	1,000	100.000%
865-541	2	0	1,000	1,000	100.000%
865-541	3	0	1,000	1,000	100.000%
865-541	4	244	753	999	75.375%
865-541	5	109	496	611	81.178%
865-541	6	265	633	905	69.945%
865-541	7	0	1,000	1,000	100.000%
865-541	8	0	1,000	1,000	100.000%
865-541	9	0	1,000	1,000	100.000%
865-544	0	251	532	932	57.082%
865-544	1	292	477	887	53.777%
865-544	2	44	920	977	94.166%
865-544	3	354	611	990	61.717%
865-544	4	373	450	863	52.144%
865-544	5	220	436	699	62.375%
865-544	6	0	1,000	1,000	100.000%
865-544	7	394	485	934	51.927%
865-544	8	0	1,000	1,000	100.000%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-544	9	41	940	992	94.758%
865-545	0	0	1,000	1,000	100.000%
865-545	1	0	1,000	1,000	100.000%
865-545	2	0	1,000	1,000	100.000%
865-545	3	0	1,000	1,000	100.000%
865-545	4	406	526	968	54.339%
865-545	5	992	7	1,000	0.700%
865-545	6	0	1,000	1,000	100.000%
865-545	7	0	1,000	1,000	100.000%
865-545	8	0	1,000	1,000	100.000%
865-545	9	0	1,000	1,000	100.000%
865-546	0	255	545	854	63.817%
865-546	1	240	611	921	66.341%
865-546	2	234	582	899	64.739%
865-546	3	177	645	919	70.185%
865-546	4	285	542	900	60.222%
865-546	5	240	569	885	64.294%
865-546	6	347	495	909	54.455%
865-546	7	276	543	871	62.342%
865-546	8	352	515	923	55.796%
865-546	9	273	551	894	61.633%
865-549	0	0	1,000	1,000	100.000%
865-549	1	59	836	999	83.684%
865-549	2	0	1,000	1,000	100.000%
865-549	3	0	1,000	1,000	100.000%
865-549	4	0	999	999	100.000%
865-549	5	283	541	837	64.636%
865-549	6	0	900	1,000	90.000%
865-549	7	476	418	920	45.435%
865-549	8	0	1,000	1,000	100.000%
865-549	9	0	1,000	1,000	100.000%
865-558	0	372	493	910	54.176%
865-558	1	241	710	990	71.717%
865-558	2	0	1,000	1,000	100.000%
865-558	3	198	582	824	70.631%
865-558	4	181	437	623	70.144%
865-558	5	153	653	954	68.449%
865-558	6	286	497	854	58.197%
865-558	7	983	15	998	1.503%
865-558	8	304	480	856	56.075%
865-558	9	255	546	884	61.765%
865-560	0	303	599	942	63.588%
865-560	1	147	682	869	78.481%
865-560	2	155	605	783	77.267%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-560	3	103	749	877	85.405%
865-560	4	0	994	1,000	99.400%
865-560	5	260	639	959	66.632%
865-560	7	77	743	1,000	74.300%
865-560	8	64	866	966	89.648%
865-560	9	124	714	893	79.955%
865-564	0	0	1,000	1,000	100.000%
865-564	1	0	1,000	1,000	100.000%
865-564	2	0	1,000	1,000	100.000%
865-564	3	0	1,000	1,000	100.000%
865-564	4	0	1,000	1,000	100.000%
865-564	5	0	1,000	1,000	100.000%
865-564	6	0	1,000	1,000	100.000%
865-564	7	0	1,000	1,000	100.000%
865-564	8	0	1,000	1,000	100.000%
865-564	9	0	1,000	1,000	100.000%
865-573	0	96	747	943	79.215%
865-573	1	88	793	951	83.386%
865-573	2	88	809	966	83.747%
865-573	3	75	827	962	85.967%
865-573	4	90	810	965	83.938%
865-573	5	112	790	974	81.109%
865-573	6	94	805	967	83.247%
865-573	7	104	797	968	82.335%
865-573	8	98	783	964	81.224%
865-573	9	83	789	951	82.965%
865-577	0	91	808	969	83.385%
865-577	1	76	747	963	77.570%
865-577	2	79	790	966	81.781%
865-577	3	89	768	964	79.668%
865-577	4	75	795	964	82.469%
865-577	5	80	810	964	84.025%
865-577	6	94	782	966	80.952%
865-577	7	93	805	964	83.506%
865-577	8	58	822	963	85.358%
865-577	9	92	787	970	81.134%
865-579	0	83	801	974	82.238%
865-579	1	84	782	965	81.036%
865-579	2	242	689	979	70.378%
865-579	3	89	786	953	82.476%
865-579	4	123	739	957	77.220%
865-579	5	107	770	950	81.053%
865-579	6	127	749	960	78.021%
865-579	7	83	750	889	84.364%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-579	8	41	912	958	95.198%
865-579	9	403	513	966	53.106%
865-582	0	0	100	100	100.000%
865-582	2	4	993	1,000	99.300%
865-582	3	327	672	1,000	67.200%
865-582	4	70	930	1,000	93.000%
865-583	0	259	567	911	62.239%
865-583	1	71	764	939	81.363%
865-583	2	44	955	1,000	95.500%
865-583	3	590	271	938	28.891%
865-583	4	326	668	998	66.934%
865-583	5	0	1,000	1,000	100.000%
865-583	6	0	1,000	1,000	100.000%
865-583	7	396	482	980	49.184%
865-583	8	88	721	951	75.815%
865-584	0	196	568	849	66.902%
865-584	1	274	531	866	61.316%
865-584	2	152	602	848	70.991%
865-584	3	225	520	836	62.201%
865-584	4	186	565	832	67.909%
865-584	5	275	525	881	59.591%
865-584	6	472	355	891	39.843%
865-584	7	240	575	894	64.318%
865-584	8	234	532	853	62.368%
865-584	9	198	598	874	68.421%
865-588	0	239	539	848	63.561%
865-588	1	260	544	856	63.551%
865-588	2	188	543	852	63.732%
865-588	3	204	624	879	70.990%
865-588	4	179	684	900	76.000%
865-588	5	257	561	868	64.631%
865-588	6	248	558	883	63.194%
865-588	7	268	553	881	62.770%
865-588	8	192	613	867	70.704%
865-588	9	453	436	911	47.859%
865-594	0	660	248	1,000	24.800%
865-594	1	247	726	1,000	72.600%
865-594	2	148	509	1,000	50.900%
865-594	3	175	797	1,000	79.700%
865-594	4	171	768	1,000	76.800%
865-594	5	333	662	999	66.266%
865-594	6	418	582	1,000	58.200%
865-594	7	29	970	999	97.097%
865-594	8	399	596	999	59.660%

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NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-594	9	432	489	1,000	48.900%
865-595	0	308	597	990	60.303%
865-595	1	116	878	997	88.064%
865-595	2	543	217	760	28.553%
865-595	3	182	730	920	79.348%
865-595	4	160	791	984	80.386%
865-595	5	0	1,000	1,000	100.000%
865-595	6	0	0	0	
865-595	7	0	0	0	
865-595	8	0	0	0	
865-595	9	0	0	0	
865-602	0	0	1,000	1,000	100.000%
865-602	1	0	1,000	1,000	100.000%
865-602	2	227	490	933	52.519%
865-602	3	40	832	985	84.467%
865-602	4	28	408	960	42.500%
865-602	5	0	600	1,000	60.000%
865-602	6	610	382	997	38.315%
865-602	7	75	859	959	89.572%
865-602	8	0	1,000	1,000	100.000%
865-602	9	0	1,000	1,000	100.000%
865-609	0	511	428	968	44.215%
865-609	1	559	368	978	37.628%
865-609	2	625	330	983	33.571%
865-609	3	255	695	972	71.502%
865-609	4	362	106	500	21.200%
865-609	5	284	715	999	71.572%
865-609	6	571	372	988	37.652%
865-609	7	636	336	989	33.974%
865-609	8	627	333	980	33.980%
865-609	9	359	526	960	54.792%
865-631	0	0	1,000	1,000	100.000%
865-631	1	0	1,000	1,000	100.000%
865-631	2	0	1,000	1,000	100.000%
865-631	3	0	1,000	1,000	100.000%
865-631	4	0	1,000	1,000	100.000%
865-631	5	0	1,000	1,000	100.000%
865-631	6	0	1,000	1,000	100.000%
865-631	7	0	1,000	1,000	100.000%
865-631	8	0	1,000	1,000	100.000%
865-631	9	0	1,000	1,000	100.000%
865-632	0	0	1,000	1,000	100.000%
865-632	1	0	1,000	1,000	100.000%
865-632	2	0	1,000	1,000	100.000%

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NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-632	3	0	1,000	1,000	100.000%
865-632	4	0	1,000	1,000	100.000%
865-632	5	0	999	999	100.000%
865-632	6	0	1,000	1,000	100.000%
865-632	7	0	1,000	1,000	100.000%
865-632	8	0	1,000	1,000	100.000%
865-632	9	0	1,000	1,000	100.000%
865-633	0	499	501	1,000	50.100%
865-633	1	0	1,000	1,000	100.000%
865-633	2	496	503	999	50.350%
865-633	3	0	1,000	1,000	100.000%
865-633	4	76	896	994	90.141%
865-633	5	350	553	974	56.776%
865-633	6	88	786	907	86.659%
865-633	7	336	659	1,000	65.900%
865-633	8	596	318	957	33.229%
865-633	9	187	725	982	73.829%
865-637	0	404	473	909	52.035%
865-637	1	251	586	928	63.147%
865-637	2	290	541	888	60.923%
865-637	3	507	390	925	42.162%
865-637	4	240	571	890	64.157%
865-637	5	568	332	925	35.892%
865-637	6	354	512	929	55.113%
865-637	7	274	559	912	61.294%
865-637	8	234	606	916	66.157%
865-637	9	265	540	885	61.017%
865-656	0	999	1	1,000	0.100%
865-656	1	993	6	1,000	0.600%
865-656	2	991	5	999	0.501%
865-656	3	994	6	1,000	0.600%
865-656	4	992	7	1,000	0.700%
865-656	5	996	3	1,000	0.300%
865-656	6	996	3	1,000	0.300%
865-656	7	994	5	1,000	0.500%
865-656	8	993	7	1,000	0.700%
865-656	9	990	8	1,000	0.800%
865-670	0	257	512	851	60.165%
865-670	1	222	578	858	67.366%
865-670	2	106	824	968	85.124%
865-670	3	105	645	789	81.749%
865-670	4	56	843	919	91.730%
865-670	5	0	1,000	1,000	100.000%
865-670	6	51	803	864	92.940%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-670	7	79	842	947	88.912%
865-670	8	153	732	928	78.879%
865-670	9	218	578	861	67.131%
865-673	0	304	518	899	57.620%
865-673	1	0	1,000	1,000	100.000%
865-673	2	49	909	969	93.808%
865-673	3	231	604	895	67.486%
865-673	4	283	588	952	61.765%
865-673	5	105	863	987	87.437%
865-673	6	294	545	957	56.949%
865-673	7	0	900	1,000	90.000%
865-673	8	276	549	921	59.609%
865-673	9	406	480	959	50.052%
865-686	0	373	511	930	54.946%
865-686	1	119	769	928	82.866%
865-686	3	310	424	974	43.532%
865-686	4	653	295	986	29.919%
865-686	7	320	621	983	63.174%
865-686	9	820	140	968	14.463%
865-687	0	107	771	953	80.902%
865-687	1	83	765	923	82.882%
865-687	2	258	607	932	65.129%
865-687	3	83	779	928	83.944%
865-687	4	211	652	928	70.259%
865-687	5	71	770	929	82.885%
865-687	6	77	782	927	84.358%
865-687	7	103	722	920	78.478%
865-687	8	65	789	930	84.839%
865-687	9	96	734	947	77.508%
865-688	0	92	735	912	80.592%
865-688	1	92	736	912	80.702%
865-688	2	96	796	948	83.966%
865-688	3	97	728	904	80.531%
865-688	4	95	752	907	82.911%
865-688	5	81	756	919	82.263%
865-688	6	436	480	929	51.668%
865-688	7	111	734	925	79.351%
865-688	8	91	762	922	82.646%
865-688	9	187	649	914	71.007%
865-689	0	467	461	950	48.526%
865-689	1	252	659	955	69.005%
865-689	2	100	741	908	81.608%
865-689	3	160	706	921	76.656%
865-689	4	86	775	922	84.056%

KNOXVILLE EXCHANGE

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-689	5	79	756	913	82.804%
865-689	6	83	748	914	81.838%
865-689	7	106	724	904	80.088%
865-689	8	487	420	941	44.633%
865-689	9	138	730	944	77.331%
865-690	0	158	634	851	74.501%
865-690	1	124	673	860	78.256%
865-690	2	176	624	845	73.846%
865-690	3	138	671	861	77.933%
865-690	4	152	634	844	75.118%
865-690	5	141	636	829	76.719%
865-690	6	117	651	824	79.005%
865-690	7	162	648	858	75.524%
865-690	8	204	584	844	69.194%
865-690	9	142	618	822	75.182%
865-691	0	181	607	828	73.309%
865-691	1	112	646	842	76.722%
865-691	2	167	620	845	73.373%
865-691	3	176	599	849	70.554%
865-691	4	185	588	831	70.758%
865-691	5	194	583	848	68.750%
865-691	6	174	608	845	71.953%
865-691	7	170	639	857	74.562%
865-691	8	147	662	876	75.571%
865-691	9	361	461	856	53.855%
865-692	0	146	637	849	75.029%
865-692	1	304	504	861	58.537%
865-692	2	292	531	921	57.655%
865-692	3	293	565	925	61.081%
865-692	4	152	777	962	80.769%
865-692	5	155	711	939	75.719%
865-692	6	177	678	873	77.663%
865-692	8	199	641	916	69.978%
865-692	9	219	587	871	67.394%
865-693	0	130	680	873	77.892%
865-693	1	143	643	837	76.822%
865-693	2	140	674	867	77.739%
865-693	3	150	681	891	76.431%
865-693	4	155	639	859	74.389%
865-693	5	197	627	875	71.657%
865-693	6	168	619	845	73.254%
865-693	7	146	641	854	75.059%
865-693	8	149	665	872	76.261%
865-693	9	159	633	863	73.349%

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NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-694	0	222	581	865	67.168%
865-694	1	204	573	801	71.536%
865-694	2	175	364	945	38.519%
865-694	3	318	512	889	57.593%
865-694	4	162	596	835	71.377%
865-694	5	301	641	972	65.947%
865-694	6	181	462	684	67.544%
865-694	7	135	663	880	75.341%
865-694	8	239	568	866	65.589%
865-694	9	244	551	857	64.294%
865-766	0	307	519	906	57.285%
865-766	1	0	300	1,000	30.000%
865-766	2	0	400	1,000	40.000%
865-766	3	0	200	1,000	20.000%
865-766	4	0	300	1,000	30.000%
865-766	5	1,000	0	1,000	0.000%
865-766	6	34	403	937	43.010%
865-766	8	100	204	304	67.105%
865-769	0	146	684	887	77.114%
865-769	1	108	814	940	86.596%
865-769	2	466	421	905	46.519%
865-769	3	127	551	932	59.120%
865-769	4	87	772	914	84.464%
865-769	5	308	551	930	59.247%
865-769	6	467	513	989	51.871%
865-769	7	292	628	965	65.078%
865-769	8	276	489	820	59.634%
865-769	9	193	627	910	68.901%
865-773	1	1,000	0	1,000	0.000%
865-909	0	299	526	906	58.057%
865-909	1	0	0	0	
865-909	2	0	1	1	100.000%
865-909	3	0	0	0	
865-909	4	1	999	1,000	99.900%
865-909	5	0	1,000	1,000	100.000%
865-909	6	0	500	1,000	50.000%
865-909	7	0	400	1,000	40.000%
865-909	8	0	700	700	100.000%
865-909	9	165	719	938	76.652%
865-970	0	73	916	997	91.876%
865-970	1	0	998	998	100.000%
865-970	2	561	396	990	40.000%
865-970	3	782	198	990	20.000%
865-970	4	835	149	995	14.975%

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NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-970	5	98	902	1,000	90.200%
865-970	6	121	878	1,000	87.800%
865-970	7	827	155	994	15.594%
865-970	8	0	997	997	100.000%
865-970	9	851	138	999	13.814%
865-971	0	0	1,000	1,000	100.000%
865-971	1	180	628	863	72.769%
865-971	2	8	990	1,000	99.000%
865-971	3	155	575	751	76.565%
865-971	4	274	568	919	61.806%
865-971	5	104	763	985	77.462%
865-971	6	59	907	978	92.740%
865-971	7	25	949	978	97.035%
865-971	8	0	1,000	1,000	100.000%
865-971	9	0	900	1,000	90.000%
865-974	0	0	0	0	
865-974	1	0	0	0	
865-974	2	0	0	0	
865-974	3	0	0	0	
865-974	4	0	0	0	
865-974	5	0	0	0	
865-974	6	0	0	0	
865-974	7	0	0	0	
865-974	8	0	1,000	1,000	100.000%
865-974	9	1	982	990	99.192%
865-985	0	1,000	0	1,000	0.000%
865-985	1	938	48	999	4.805%
865-985	2	0	1,000	1,000	100.000%
865-985	3	0	1,000	1,000	100.000%
865-985	4	0	1,000	1,000	100.000%
865-985	5	0	1,000	1,000	100.000%
865-985	6	0	1,000	1,000	100.000%
865-985	7	500	500	1,000	50.000%
865-985	8	1,000	0	1,000	0.000%
865-985	9	992	7	1,000	0.700%
TOTAL:		118,414	402,059	555,164	72.422%

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 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 'J. R. [unclear]', written over a horizontal line.