



BellSouth Telecommunications, Inc.

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Nashville, TN 37201-3300

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Senior State Operations Counsel

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Fax 615 214 7406

March 28, 2007

VIA HAND DELIVERY

filed electronically in docket office on 03/28/07

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 Hubbell Lenoir City, Inc.*
Docket No 07-00080

Dear Chairman Kyle:

Enclosed are the original and four copies of AT&T Tennessee'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,

A handwritten signature in black ink, appearing to read "Joelle Phillips", written over the printed name.

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 Hubbell Lenoir City, Inc.*

Docket No. _____

PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL

AT&T Tennessee ("AT&T Tennessee"), 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 AT&T Tennessee's application for use of central office code numbering resources in the 865 area code.

AT&T Tennessee respectfully shows the Authority as follows:

1. AT&T Tennessee is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Lenoir 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 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. AT&T Tennessee 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 March 26, 2007, AT&T Tennessee 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 two blocks of 1,000 numbers necessary to meet the demands of its customer, Hubbell Lenoir City, Inc. ("Hubbell"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for two blocks of 1,000 numbers in the 865 NPA area code, in response to Hubbell's request for 200 DID numbers in the 2100 - 2199 and 3100 - 3199 ranges. Hubbell cited installation of a new telephone system as its basis for this request. However, AT&T Tennessee did not

have sufficient number resources available within its inventory in the Lenoir City rate center, and, accordingly, AT&T Tennessee was unable to provide Hubbell with sufficient numbers to meet its needs. For this reason, AT&T Tennessee sought the numbering resources as noted above.

9. AT&T Tennessee 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 Lenoir City rate center had an MTE of approximately 39 months.

11. Despite the fact that AT&T Tennessee's Lenoir City rate center may not exhaust for 39 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Hubbell within the Lenoir City rate center. This is because the individual switch that serves this customer within the Lenoir City rate center does not have sufficient number resources to meet the customer's request.

12. On or about March 26, 2007, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that AT&T Tennessee 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 AT&T Tennessee 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. AT&T Tennessee's inability to provide this large business customer with the requested numbers prevents AT&T Tennessee from providing the quality of service this customer desires and expects. (Correspondence from Hubbell 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 October 31, 2006, the projected exhaust date of the 865 NPA is the Fourth Quarter 2024. Therefore, granting AT&T Tennessee'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 AT&T Tennessee with numbering resources to meet the service requirements of the University of Tennessee, even though AT&T Tennessee 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. In reviewing previous petitions of this type, the TRA Staff has requested that AT&T Tennessee provide additional information concerning number utilization for the specific central office involved in the request. This information for the Lenoir City, including the LNCYTNMADS0 Central Office is attached hereto as Exhibit "G."

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. AT&T Tennessee believes that the Authority can more quickly address the numbering problem facing Hubbell and AT&T Tennessee, and, because time is of the essence to the customer, AT&T Tennessee 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 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 AT&T Tennessee to meet Hubbell'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 Hubbell's needs, the NeuStar is preventing Hubbell from obtaining the service of its choice from its carrier of choice, AT&T Tennessee.

20. Notwithstanding customer need for a specific numbering arrangement, AT&T Tennessee's analysis indicates that AT&T Tennessee 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 AT&T Tennessee's inability to respond to its customer's needs for specific numbering resources.

CONCLUSION

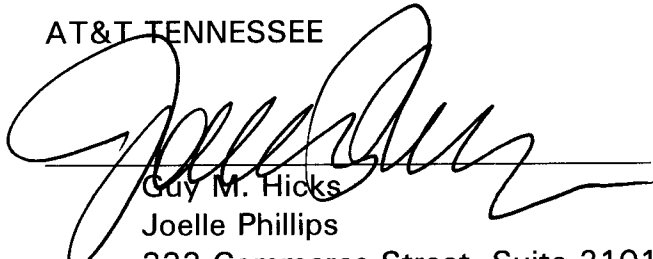
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct the NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of Hubbell in order that Hubbell may receive the service of its choice from the provider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

WHEREFORE, AT&T Tennessee requests:

1. The Authority review the decision of the NeuStar to deny AT&T Tennessee's request for additional numbering resources; and
2. The Authority direct the NeuStar to provide numbers to AT&T Tennessee to meet the specific requirements of Hubbell in the Lenoir City rate center within the 865 NPA.

Respectfully submitted,

AT&T TENNESSEE



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

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Request Resources

State **TENNESSEE**

NPA **865**

Rate Center **LENOIRCITY**

OCN **9419-BELLSOUTH SO CNTL**

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.

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pam.porterfield@oridge.bellsouth.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 **BELLSOUTH SD CNTL**
 Headquarters Address: **3535 Colonnade Parkway**
 City: **Birmingham**
 State: **AL**
 Zip: **35243**

Contact Name **Mrs Pam Porterfield**
 Contact Address **3535 Colonnade Parkway**
 City **Birmingham** State **AL**
 Zip **35243**
 Telephone **(205) 977-3025** Fax
 E-mail **pam.porterfield@bellsouth.com**

Pooling Administrator II:

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**

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

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

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1.2 General Information

LRN Needed ⁱⁱⁱ ☒ No

NPA 865 LATA ^{iv} 474

OCN ^{iv} 6419-BELL SOUTH SO
CNTL

Parent Company OCN ^v 9419

Number of Thousands-Blocks Requested 1

Switch Identification (Switching Identity/POI) ^{vi} LNCYTNMADS0 City or Wire Center Name

Rate Center ^{vi} LENOIR CITY Rate Center Sub Zone

1.3 Dates

Date of Application ^{vii} Monday, March 26, 2007

Requested Block Effective Date ^{viii} 26 Apr 2007

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

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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.

	>>>	865-635-3	Delete
--	-----	-----------	--------

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

	>>>		Delete
--	-----	--	--------

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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Request For Resources

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- Disconnect
- Block Transfer

Confirm Block(s) in Service (0)

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Assessment

Remarks

I hereby certify that the above information requesting an NXX-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 (NXX-X) Pooling Administration Guidelines (ATIS-0300066)

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 correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider™. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMPS. They also indicate the primary type of business in which the numbering...

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NEU STAR

Date Monday, March 26, 2007
 OCN 9419
 Company Name **BELL SOUTH SO CNTL**
 Rate Center **LENOIR CITY**

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

865-988	1
865-988	2
865-988	3
865-988	4
865-988	5
865-988	6
865-988	7
865-988	8
865-988	9

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

List excluded Code(s) or Block(s)

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Block Transfer

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E. Growth History - Previous 6 months²

Month 1	95	Month 2	106
Month 3	173	Month 4	101
Month 5	52	Month 6	74

F. Forecast - Next 12 months³

Month 1	100	Month 2	100
Month 3	100	Month 4	100
Month 5	100	Month 6	100
Month 7	100	Month 8	100
Month 9	100	Month 10	100
Month 11	100	Month 12	100

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

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

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Lloyd Wood Middle School

Ligon number manager

Ligon order path

MSN

MTR - Non-Management P...

NeuStar Number Pool Admin...

Number Manager

ORBIT Customer Markets ...

Order Path

PAWS Documents & Reso...

PawsWeb -- South Central...

PawsWeb -- Southern Bell

Radio Station Guide

Regional ESP Schedules

SIGN ON

SWITCH-EAST

switch.west.bst.bls.coms...

SWITCH-FOMS

SWITCH-ga-nc-sc

SWITCH-west

SWprod01.bst.bls.com

TN Tracker - South Centra...

TN Tracker - Southern Bell

TN Tracker & CNUM User ...

Tracker B'ham

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Reports

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 100.000

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	3873	38.730

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 73.631

Explanation

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

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

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

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

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

Show Calculations Continue Cancel

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Petition of AT&T Tennessee
Hubbell Lenoir City, Inc.
Exhibit C

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Request For Resources Modify Disconnect Block Transfer

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Sign Out

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

Your utilization calculates to 73.631 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

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Petition of AT&T Tennessee
Hubbell Lenoir City, Inc.
Exhibit D

Terry Jennings
Communications Technician



Hubbell Lenoir City, Inc.
3821 Industrial Park Drive
Lenoir City, TN 37771
Tel: 865-986-9726
Fax: 865-988-8520
E-Mail: tjennin@hps.hubbell.com

February 21, 2007

Troy Check
BellSouth Business

Please use this letter as authorization to place 200 DID numbers in reserve for our company as we are currently working on a project to install a new telephone system at our company located in Lenoir City, TN at the above address. The DID numbers we are requesting will be used on the new ISDN/PRI circuit that you previously quoted for us.

In order to prevent us from having to change our current telephone extensions now in use at our company we are requesting the following block of DID numbers 3100-3199 in an area code/exchange in Lenoir City, TN.

In the same area code/exchange we would also like to have the block of 2100-2199 reserved for us.

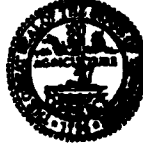
In the event that 2100-2199 can not be placed in reserve for us we could use the block of 4100-4199 but prefer not to do this if possible.

I will wait until I hear back from you as to whether or not these numbers can be placed in reserve for us. If you have any questions or need any additional information please contact me at the email address listed above.

Thank You,

A handwritten signature in cursive script that reads "Terry Jennings".
Terry Jennings
Communications Technician
Hubbell Lenoir City, Inc.

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 838 Numbering Plan Areas (NPAs). Reservation of one NXX was requested for Guilford County Government and one NXX was requested for Corning, Inc., from NANPA.

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

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

WHEREUPON, the Commission now reaches the following

CONCLUSIONS

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

IT IS, THEREFORE, ORDERED as follows:

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


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

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

ISSUED BY ORDER OF THE COMMISSION.

This the 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION:



Geneva S. Thigpen, Chief Clerk

LENIOR CITY EXCHANGE

NPA-NXX	X	Available Number s	Assigned Numbers	Total Number Resources	Utilization
865-271	6	0	1,000	1,000	100.000%
865-986	0	128	735	920	79.891%
865-986	1	104	724	918	78.867%
865-986	2	107	769	934	82.334%
865-986	3	120	752	936	80.342%
865-986	4	111	724	903	80.177%
865-986	5	105	771	917	84.079%
865-986	6	124	751	926	81.102%
865-986	7	160	711	929	76.534%
865-986	8	104	764	939	81.363%
865-986	9	126	726	924	78.571%
865-988	0	276	621	928	66.918%
865-988	1	735	239	986	24.239%
865-988	2	354	435	797	54.580%
865-988	3	138	628	934	67.238%
865-988	4	203	634	918	69.063%
865-988	5	322	535	913	58.598%
865-988	6	197	657	915	71.803%
865-988	7	149	732	946	77.378%
865-988	8	173	679	924	73.485%
865-988	9	137	718	921	77.959%
Total:		3,873	14,305	19,428	73.631%

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2007, 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 "John P. [unclear]", written over a horizontal line.