



**BellSouth Telecommunications, Inc.**

333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

**Joelle J. Phillips**

Senior State Operations Counsel

615 214 6311

Fax 615 214 7406

April 19, 2007

**VIA HAND DELIVERY**

e-filed in docket office on 04/19/07

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 Pilot Travel Centers, LLC*  
Docket No 07-00096

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,

Joelle Phillips

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

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 Travel Centers, LLC*

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

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

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 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. 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 April 18, 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, Pilot Travel Centers, LLC ("Pilot"). 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 Pilot's request for 2,000 numbers in the 865-474-4XXX and 5XXX blocks. Pilot cited expansion of their internal calling plan as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Knoxville rate center, and, accordingly, AT&T Tennessee was unable to provide Pilot 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 Knoxville rate center had an MTE of approximately 59 months.

11. Despite the fact that AT&T Tennessee's Knoxville rate center may not exhaust for 59 months, AT&T Tennessee 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 April 18, 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 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 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 Knoxville, including the KNLVTNBED0 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 Pilot 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 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, 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 Pilot in order that Pilot may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, AT&T Tennessee requests:

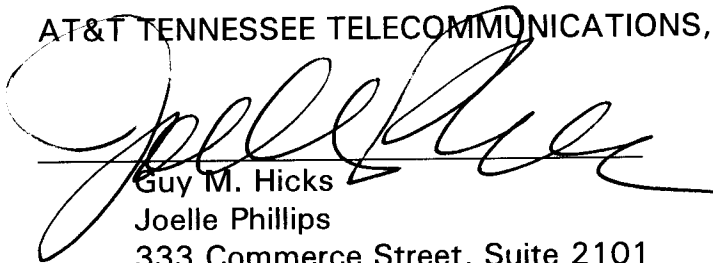
1. The Authority review the decision of the NeuStar to deny AT&T Tennessee's request for additional numbering resources; and



2. The Authority direct the NeuStar to provide numbers to AT&T Tennessee to meet the specific requirements of Pilot in the Knoxville rate center within the 865 NPA.

Respectfully submitted,

AT&T TENNESSEE 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

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

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

Google Go Bookmarks 1119 blocked Check AutoLink AutoFill Send to Settings

**Pooling Administration System**

Sign Out

**Request Resources**

State: TENNESSEE  
NPA: 865  
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.

Question? E-mail us  
© 1999-2005 NeuStar, Inc.  
Legal Notices | Privacy Agreement

Done Internet

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

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

Google Go Bookmarks 1119 blocked Check AutoLink AutoFill Send to Settings

**NEUSTAR**

**Type of Application : New**

**1.1 Contact Information :**

*Note: If any of the contact info is incorrect, edit your user profile.*

**Block Applicant :**

Company Name **BELLSOUTH SO CNTL**  
Headquarters Address: **3535 Colonnade Parkway**  
City: **Birmingham**  
State: **AL**  
Zip: **35243**

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

**Pooling Administrator \*\*:**

Contact Name **Ms Genevieve Paulino**  
Contact Address **1800 Sutter St. Ste. 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**

Question? E-mail us  
© 1999-2005 Neustar, Inc.  
Legal Notices | Privacy Agreement

Done Internet

Pooling Administration System Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

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

Google  Go

Bookmarks 1119 blocked Check AutoLink AutoFill Send to Settings

**Favorites**

- Add...
- Organize...
- 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
- Tracker Charlotte
- USOC Database

**NEU STAR**

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

Question? E-mail us  
© 1999-2006 NeuStar, Inc.  
Legal Notices | Privacy Agreement

LRN Needed <sup>iii</sup> No  
NPA 865 LATA <sup>iv</sup> 474  
OCN <sup>v</sup> 9419-BELLSOUTH SO  
CNTL  
Parent Company OCN <sup>vi</sup> 9419  
Number of Thousands-Blocks Requested 2  
Switch Identification (Switching Identity/POI) <sup>vii</sup> KNVLTNBEDS0 City or Wire Center Name  
Rate Center <sup>viii</sup> KNOXVILLE Rate Center Sub Zone

**1.3 Dates**

Date of Application <sup>vii</sup> Tuesday, April 17, 2007  
Requested Block Effective Date <sup>viii</sup> 18 May 2007  
Request Expedited Treatment ☐ Yes ☒ No

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

a) Type of Service Provider <sup>i</sup> Incumbent Local Exchange Carrier (ILEC)  
b) Primary type of service Blocks to be used for <sup>ii</sup> 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 of

Done Internet

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites

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

Google C Go Bookmarks 1119 blocked Check AutoFill Send to Settings

**Favorites**

Add... Organize...

- 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 & CNJM User ...
- Tracker Bham
- Tracker Charlotte
- USOC Database

**NEU STAR**

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

			865-474-4 865-474-5 <a href="#">Delete</a>
d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any			<a href="#">Delete</a>

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

Over phone? E-mail us  
© 1998-2006 NeuStar, Inc.  
[Legal Notices](#) | [Privacy Agreement](#)

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

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

Months to Exhaust and Utilization Certification Worksheet - IN Level

Date Tuesday, April 17, 2007  
OCN 9419  
Company Name BELLSOUTH 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
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 \* 137871  
B. Assigned Numbers \* 391933  
C. Total Numbering Resources \* 550973  
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \* 0

List excluded Code(s) or Block(s)

Question? E-mail us  
© 1996-2006 NeuStar, Inc.  
Legal Notices | Privacy Agreement

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites

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

Google Go Bookmarks 1119 blocked Check AutoLink Alerts Send to Settings

**NEU STAR**

Request For Resources  
Modify  
Disconnect  
Block Transfer

Confirm Block(s) in Service  
Search Forms  
Submit Forecast  
User Profile  
Donate Block  
Reports

Question? E-mail us  
© 1999-2000 NeuStar, Inc.  
Legal Notices | Privacy Agreement

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

Month 1	6474	Month 2	1463
Month 3	731	Month 4	1167
Month 5	2515	Month 6	1792

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

Month 1	2357	Month 2	2357
Month 3	2357	Month 4	2357
Month 5	2357	Month 6	2357
Month 7	2357	Month 8	2357
Month 9	2357	Month 10	2357
Month 11	2357	Month 12	2357

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

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

Explanation

Internet

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

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

Google

1119 blocked

Settings

NEU STAR

Request For Resources

Modify

Disconnect

Block Transfer

Confirm Block(s) In Service

Search Forms

Submit Forecast

User Profile

Donate Blocks

Reports

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 2357.000

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	137871	58.494
2	138871	58.919

I. Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 71.135

Explanation

1<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.

2<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.

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

4<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)).

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

Show Calculations Continue Cancel

Overseer? E-mail us

© 1994-2000 NeuStar, Inc.

Legal Notices | Privacy Agreement

Done

Internet



Petition of AT&T Tennessee  
Pilot Travel Centers, LLC  
Exhibit C

Pooling Administration System - Microsoft Internet Explorer provided by BellSouth

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites

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

Google G- Go Bookmarks 1119 blocked Check AutoLink AutoFill Send to Settings

Favorites

- Add... Organize...
- 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
- Tracker Charlotte
- USOC Database

NEU STAR

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

Question? E-mail us  
413991 2000 NeuStar, Inc.  
Legal Notices | Privacy Agreement

Pooling Administration System

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

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

Your utilization calculates to 71.135 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

Done Internet

# Memo

**To:** Joan Austin/Colin Ross/Ed Coffey/Michael Cooper/Sue Thornton  
**From:** Jeremy Todd  
**Date:** April 17, 2007  
**Re:** New 865-474-4XXX DID range request

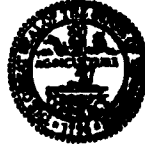
---

We need to expand our current 865-474-XXXX range to include all of our 4XXX, and 5XXX extensions for our travel centers across US. Please research the 865-474-4000 - 865-474-5999 DID range, and move forward with the new order.

Thank you,

Jeremy Todd  
Senior Network/Security Engineer  
CCNA, CCNP, CCSA, CCSE  
Pilot Travel Centers, LLC  
Office: 865.474.2668  
Cell: 865.816.0814  
Fax: 865.297.1425

TENNESSEE REGULATORY AUTHORITY



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

460 James Robertson Parkway  
Nashville, Tennessee 37243-0503

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 4<sup>th</sup> 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 1-800-342-8339, Facsimile (615) 741-8953  
[www.state.tx.us/tra](http://www.state.tx.us/tra)

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. P-55, SUB 1268**

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

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

**ORDER RULING ON THE  
BELLSOUTH PETITION**

**BY THE COMMISSION:** On March 6, 2001, BellSouth Telecommunication, Inc. (BellSouth) requested that the Commission review the North American Numbering Plan 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 10<sup>th</sup> day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION:

A handwritten signature in black ink, reading "Geneva S. Thigpen". The signature is written in a cursive style with a large initial 'G'.

Geneva S. Thigpen, Chief Clerk

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-212	0	53	902	977	92.323%
865-212	1	0	1,000	1,000	100.000%
865-212	2	52	940	996	94.378%
865-212	3	506	230	817	28.152%
865-212	4	307	581	934	62.206%
865-212	5	80	885	968	91.426%
865-212	6	8	603	613	98.369%
865-212	7	0	386	386	100.000%
865-212	8	0	1,000	1,000	100.000%
865-212	9	136	813	970	83.814%
865-215	0	0	1,000	1,000	100.000%
865-215	1	5	895	900	99.444%
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	33	952	990	96.162%
865-219	0	593	313	934	33.512%
865-219	1	100	900	1,000	90.000%
865-219	2	100	900	1,000	90.000%
865-219	3	0	1,000	1,000	100.000%
865-219	4	103	895	1,000	89.500%
865-219	5	103	889	1,000	88.900%
865-219	6	216	730	985	74.112%
865-219	7	134	708	934	75.803%
865-219	8	630	285	946	30.127%
865-219	9	604	292	922	31.670%
865-226	0	0	980	1,000	98.000%
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	1,000	0	1,000	0.000%
865-281	0	195	601	891	67.452%
865-281	1	0	1,000	1,000	100.000%
865-281	2	160	707	923	76.598%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-281	3	0	1,000	1,000	100.000%
865-281	4	83	824	908	90.749%
865-281	5	289	707	999	70.771%
865-281	6	49	631	992	63.609%
865-281	7	632	300	946	31.712%
865-281	8	153	658	898	73.274%
865-281	9	547	348	923	37.703%
865-329	0	730	202	974	20.739%
865-329	1	70	919	993	92.548%
865-329	2	157	505	984	51.321%
865-329	3	540	290	854	33.958%
865-329	4	689	299	994	30.080%
865-329	5	112	885	999	88.589%
865-329	8	272	680	975	69.744%
865-329	9	468	499	986	50.609%
865-330	0	102	541	656	82.470%
865-330	1	59	801	880	91.023%
865-330	2	248	691	968	71.384%
865-330	3	129	858	989	86.754%
865-330	4	0	1,000	1,000	100.000%
865-330	5	0	1,000	1,000	100.000%
865-330	6	16	980	999	98.098%
865-330	7	401	594	998	59.519%
865-330	8	585	388	980	39.592%
865-330	9	768	168	961	17.482%
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	1,000	0	1,000	0.000%
865-373	6	1,000	0	1,000	0.000%
865-373	7	0	1,000	1,000	100.000%
865-373	8	1,000	0	1,000	0.000%
865-373	9	1,000	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	310	690	1,000	69.000%
865-374	4	200	800	1,000	80.000%
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%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-374	8	0	1,000	1,000	100.000%
865-374	9	0	1,000	1,000	100.000%
865-403	0	979	5	999	0.501%
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	116	816	937	87.086%
865-450	2	167	729	906	80.464%
865-450	3	97	879	982	89.511%
865-450	4	57	939	999	93.994%
865-450	5	374	583	980	59.490%
865-450	6	0	1,000	1,000	100.000%
865-450	7	0	1,000	1,000	100.000%
865-450	8	80	874	975	89.641%
865-450	9	566	319	916	34.825%
865-470	0	93	809	926	87.365%
865-470	1	393	607	1,000	60.700%
865-470	2	175	649	877	74.002%
865-470	3	357	523	908	57.599%
865-470	4	77	545	647	84.235%
865-470	5	26	970	997	97.292%
865-470	6	0	1,000	1,000	100.000%
865-470	7	168	704	908	77.533%
865-470	8	266	542	871	62.227%
865-470	9	207	575	834	68.945%
865-474	2	1,000	0	1,000	0.000%
865-474	3	1,000	0	1,000	0.000%
865-521	0	286	553	863	64.079%
865-521	1	293	665	960	69.271%
865-521	2	143	785	932	84.227%
865-521	3	663	312	995	31.357%
865-521	4	723	251	985	25.482%
865-521	5	82	714	814	87.715%



KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-521	6	298	522	899	58.065%
865-521	7	322	532	922	57.701%
865-521	8	129	809	955	84.712%
865-521	9	406	469	926	50.648%
865-522	0	294	548	932	58.798%
865-522	1	363	527	945	55.767%
865-522	2	294	572	918	62.309%
865-522	3	305	560	899	62.291%
865-522	4	387	514	943	54.507%
865-522	5	334	538	927	58.037%
865-522	6	308	555	903	61.462%
865-522	7	343	530	936	56.624%
865-522	8	325	556	932	59.657%
865-522	9	303	557	920	60.543%
865-523	0	337	527	914	57.659%
865-523	1	308	550	910	60.440%
865-523	2	326	539	910	59.231%
865-523	3	372	523	936	55.876%
865-523	4	323	577	942	61.253%
865-523	5	325	549	934	58.779%
865-523	6	312	545	922	59.111%
865-523	7	303	568	933	60.879%
865-523	8	301	586	925	63.351%
865-523	9	321	541	900	60.111%
865-524	0	313	542	908	59.692%
865-524	1	302	564	915	61.639%
865-524	2	318	551	913	60.350%
865-524	3	301	508	855	59.415%
865-524	4	323	528	910	58.022%
865-524	5	298	563	891	63.187%
865-524	6	286	657	961	68.366%
865-524	7	291	586	920	63.696%
865-524	8	543	395	947	41.711%
865-524	9	481	405	923	43.879%
865-525	0	285	500	888	56.306%
865-525	1	281	568	904	62.832%
865-525	2	298	527	878	60.023%
865-525	3	318	519	891	58.249%
865-525	4	273	579	926	62.527%
865-525	5	355	526	927	56.742%
865-525	6	285	579	914	63.348%
865-525	7	285	585	930	62.903%
865-525	8	307	543	923	58.830%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-525	9	292	517	893	57.895%
865-531	0	177	600	849	70.671%
865-531	1	155	599	825	72.606%
865-531	2	234	521	817	63.770%
865-531	3	236	531	825	64.364%
865-531	4	482	366	876	41.781%
865-531	5	685	247	958	25.783%
865-531	6	149	727	912	79.715%
865-531	7	158	622	832	74.760%
865-531	8	202	582	841	69.203%
865-531	9	102	573	742	77.224%
865-539	0	171	592	841	70.392%
865-539	1	188	586	829	70.688%
865-539	2	247	506	858	58.974%
865-539	3	222	497	744	66.801%
865-539	4	274	494	841	58.740%
865-539	5	264	444	927	47.896%
865-539	6	159	597	850	70.235%
865-539	7	8	288	298	96.644%
865-539	8	53	787	948	83.017%
865-539	9	195	562	821	68.453%
865-540	0	17	981	999	98.198%
865-540	1	252	549	831	66.065%
865-540	2	300	700	1,000	70.000%
865-540	3	107	866	986	87.830%
865-540	4	192	735	957	76.803%
865-540	5	308	570	900	63.333%
865-540	6	0	985	985	100.000%
865-540	7	282	238	520	45.769%
865-540	8	553	345	941	36.663%
865-540	9	29	961	997	96.389%
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	165	833	999	83.383%
865-541	5	114	491	610	80.492%
865-541	6	264	644	915	70.383%
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	338	489	918	53.268%
865-544	1	340	441	878	50.228%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-544	2	56	913	976	93.545%
865-544	3	345	636	987	64.438%
865-544	4	300	413	742	55.660%
865-544	5	269	402	690	58.261%
865-544	6	0	1,000	1,000	100.000%
865-544	7	408	441	913	48.302%
865-544	8	0	1,000	1,000	100.000%
865-544	9	48	934	989	94.439%
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	452	522	998	52.305%
865-545	5	994	6	1,000	0.600%
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	289	521	844	61.730%
865-546	1	338	501	904	55.420%
865-546	2	326	496	894	55.481%
865-546	3	385	465	909	51.155%
865-546	4	333	494	887	55.693%
865-546	5	353	477	870	54.828%
865-546	6	398	451	901	50.055%
865-546	7	307	493	846	58.274%
865-546	8	355	500	904	55.310%
865-546	9	322	492	878	56.036%
865-549	0	0	1,000	1,000	100.000%
865-549	1	62	836	999	83.684%
865-549	2	0	999	1,000	99.900%
865-549	3	0	1,000	1,000	100.000%
865-549	4	0	999	999	100.000%
865-549	5	302	528	835	63.234%
865-549	6	100	900	1,000	90.000%
865-549	7	382	517	919	56.257%
865-549	8	0	1,000	1,000	100.000%
865-549	9	0	1,000	1,000	100.000%
865-558	0	392	479	901	53.163%
865-558	1	277	654	952	68.697%
865-558	2	0	1,000	1,000	100.000%
865-558	3	224	552	815	67.730%
865-558	4	170	451	622	72.508%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-558	5	276	640	953	67.156%
865-558	6	282	492	849	57.951%
865-558	7	985	9	998	0.902%
865-558	8	301	478	846	56.501%
865-558	9	364	429	871	49.254%
865-560	0	205	577	820	70.366%
865-560	1	175	651	861	75.610%
865-560	2	86	668	774	86.305%
865-560	3	108	747	870	85.862%
865-560	4	1	994	1,000	99.400%
865-560	5	245	646	947	68.215%
865-560	7	177	803	1,000	80.300%
865-560	8	66	877	967	90.693%
865-560	9	284	526	875	60.114%
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	110	695	904	76.881%
865-573	1	103	772	933	82.744%
865-573	2	119	730	926	78.834%
865-573	3	41	823	932	88.305%
865-573	4	113	770	941	81.828%
865-573	5	106	753	948	79.430%
865-573	6	97	771	941	81.934%
865-573	7	116	746	934	79.872%
865-573	8	130	739	935	79.037%
865-573	9	85	742	919	80.740%
865-577	0	91	770	939	82.002%
865-577	1	98	714	936	76.282%
865-577	2	135	721	942	76.539%
865-577	3	111	726	932	77.897%
865-577	4	110	744	929	80.086%
865-577	5	104	756	935	80.856%
865-577	6	123	737	932	79.077%
865-577	7	103	770	935	82.353%
865-577	8	88	775	943	82.185%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-577	9	130	730	936	77.991%
865-579	0	178	687	940	73.085%
865-579	1	118	733	932	78.648%
865-579	2	99	801	963	83.178%
865-579	3	120	736	926	79.482%
865-579	4	133	699	920	75.978%
865-579	5	142	689	912	75.548%
865-579	6	144	689	934	73.769%
865-579	7	81	752	881	85.358%
865-579	8	43	902	954	94.549%
865-579	9	488	414	943	43.902%
865-582	0	0	100	100	100.000%
865-582	2	4	993	1,000	99.300%
865-582	3	328	666	1,000	66.600%
865-582	4	70	930	1,000	93.000%
865-583	0	408	444	903	49.169%
865-583	1	73	761	939	81.044%
865-583	2	43	957	1,000	95.700%
865-583	3	597	265	934	28.373%
865-583	4	331	666	998	66.733%
865-583	5	0	1,000	1,000	100.000%
865-583	6	0	1,000	1,000	100.000%
865-583	7	398	479	978	48.978%
865-583	8	95	719	951	75.605%
865-584	0	226	524	827	63.362%
865-584	1	258	512	849	60.306%
865-584	2	302	459	829	55.368%
865-584	3	271	476	807	58.984%
865-584	4	250	501	817	61.322%
865-584	5	303	490	869	56.387%
865-584	6	254	532	875	60.800%
865-584	7	278	502	885	56.723%
865-584	8	269	484	838	57.757%
865-584	9	299	488	857	56.943%
865-588	0	222	563	839	67.104%
865-588	1	258	532	843	63.108%
865-588	2	245	484	823	58.809%
865-588	3	270	558	865	64.509%
865-588	4	150	666	895	74.413%
865-588	5	250	573	862	66.473%
865-588	6	269	547	876	62.443%
865-588	7	267	552	872	63.303%
865-588	8	217	563	843	66.785%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-588	9	255	588	897	65.552%
865-594	0	655	248	1,000	24.800%
865-594	1	251	725	1,000	72.500%
865-594	2	266	589	1,000	58.900%
865-594	3	88	885	1,000	88.500%
865-594	4	129	810	1,000	81.000%
865-594	5	331	647	982	65.886%
865-594	6	496	497	1,000	49.700%
865-594	7	92	898	997	90.070%
865-594	8	408	583	998	58.417%
865-594	9	433	489	1,000	48.900%
865-595	0	279	623	987	63.121%
865-595	1	122	870	996	87.349%
865-595	2	523	217	740	29.324%
865-595	3	193	706	900	78.444%
865-595	4	180	751	981	76.555%
865-595	5	0	1,000	1,000	100.000%
865-602	0	0	1,000	1,000	100.000%
865-602	1	0	1,000	1,000	100.000%
865-602	2	326	468	922	50.759%
865-602	3	147	829	985	84.162%
865-602	4	536	424	960	44.167%
865-602	5	400	600	1,000	60.000%
865-602	6	608	381	997	38.215%
865-602	7	108	827	952	86.870%
865-602	8	0	1,000	1,000	100.000%
865-602	9	0	1,000	1,000	100.000%
865-609	0	548	366	940	38.936%
865-609	1	618	309	955	32.356%
865-609	2	650	296	974	30.390%
865-609	3	254	686	961	71.384%
865-609	4	359	94	494	19.028%
865-609	5	284	712	999	71.271%
865-609	6	465	480	981	48.930%
865-609	7	663	305	978	31.186%
865-609	8	657	292	971	30.072%
865-609	9	363	505	934	54.069%
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%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
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%
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	198	503	701	71.755%
865-633	3	0	1,000	1,000	100.000%
865-633	4	96	888	994	89.336%
865-633	5	341	566	969	58.411%
865-633	6	106	780	906	86.093%
865-633	7	330	663	1,000	66.300%
865-633	8	373	511	944	54.131%
865-633	9	282	630	969	65.015%
865-637	0	329	513	901	56.937%
865-637	1	326	524	909	57.646%
865-637	2	316	494	873	56.586%
865-637	3	366	498	919	54.189%
865-637	4	317	512	881	58.116%
865-637	5	336	519	918	56.536%
865-637	6	360	497	916	54.258%
865-637	7	365	488	896	54.464%
865-637	8	337	514	905	56.796%
865-637	9	356	455	871	52.239%
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	992	7	1,000	0.700%
865-656	8	993	7	1,000	0.700%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-656	9	989	9	1,000	0.900%
865-670	0	299	468	832	56.250%
865-670	1	264	524	834	62.830%
865-670	2	140	797	962	82.848%
865-670	3	131	629	779	80.745%
865-670	4	58	840	914	91.904%
865-670	5	0	1,000	1,000	100.000%
865-670	6	54	795	860	92.442%
865-670	7	81	842	944	89.195%
865-670	8	155	709	913	77.656%
865-670	9	277	497	837	59.379%
865-673	0	333	482	893	53.975%
865-673	1	0	1,000	1,000	100.000%
865-673	2	54	902	967	93.278%
865-673	3	266	584	895	65.251%
865-673	4	337	554	940	58.936%
865-673	5	115	851	987	86.221%
865-673	6	345	489	945	51.746%
865-673	7	100	900	1,000	90.000%
865-673	8	375	452	910	49.670%
865-673	9	344	538	951	56.572%
865-686	0	365	531	923	57.530%
865-686	1	134	760	922	82.430%
865-686	3	324	405	966	41.925%
865-686	4	622	310	980	31.633%
865-686	7	354	582	979	59.448%
865-686	9	832	121	963	12.565%
865-687	0	142	719	930	77.312%
865-687	1	144	680	898	75.724%
865-687	2	110	733	910	80.549%
865-687	3	95	739	906	81.567%
865-687	4	78	742	902	82.262%
865-687	5	134	700	909	77.008%
865-687	6	112	715	911	78.485%
865-687	7	119	694	900	77.111%
865-687	8	96	727	904	80.420%
865-687	9	109	722	919	78.564%
865-688	0	109	711	890	79.888%
865-688	1	102	714	882	80.952%
865-688	2	147	718	914	78.556%
865-688	3	126	692	879	78.726%
865-688	4	106	720	889	80.990%
865-688	5	94	720	892	80.717%



KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-688	6	450	440	911	48.299%
865-688	7	163	672	899	74.750%
865-688	8	114	721	907	79.493%
865-688	9	102	691	886	77.991%
865-689	0	491	423	940	45.000%
865-689	1	182	696	932	74.678%
865-689	2	124	714	886	80.587%
865-689	3	173	666	893	74.580%
865-689	4	122	708	888	79.730%
865-689	5	128	713	900	79.222%
865-689	6	114	692	888	77.928%
865-689	7	162	650	880	73.864%
865-689	8	515	380	926	41.037%
865-689	9	150	701	928	75.539%
865-690	0	190	589	837	70.370%
865-690	1	141	648	840	77.143%
865-690	2	213	571	830	68.795%
865-690	3	173	605	839	72.110%
865-690	4	130	633	827	76.542%
865-690	5	181	584	813	71.833%
865-690	6	165	584	809	72.188%
865-690	7	184	595	837	71.087%
865-690	8	203	571	829	68.878%
865-690	9	165	588	813	72.325%
865-691	0	160	613	814	75.307%
865-691	1	139	610	821	74.300%
865-691	2	190	559	826	67.676%
865-691	3	202	546	824	66.262%
865-691	4	186	568	811	70.037%
865-691	5	201	568	822	69.100%
865-691	6	168	613	829	73.945%
865-691	7	161	616	835	73.772%
865-691	8	155	647	855	75.673%
865-691	9	375	431	844	51.066%
865-692	0	274	522	840	62.143%
865-692	1	347	460	844	54.502%
865-692	2	88	690	910	75.824%
865-692	3	365	499	913	54.655%
865-692	4	169	730	954	76.520%
865-692	5	172	687	913	75.246%
865-692	6	177	669	867	77.163%
865-692	8	333	492	899	54.727%
865-692	9	242	542	851	63.690%

KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-693	0	142	656	848	77.358%
865-693	1	126	641	821	78.076%
865-693	2	156	619	840	73.690%
865-693	3	168	639	861	74.216%
865-693	4	162	635	845	75.148%
865-693	5	241	577	864	66.782%
865-693	6	197	552	818	67.482%
865-693	7	199	580	835	69.461%
865-693	8	190	630	858	73.427%
865-693	9	204	570	848	67.217%
865-694	0	224	568	847	67.060%
865-694	1	136	566	719	78.720%
865-694	2	99	395	917	43.075%
865-694	3	307	489	855	57.193%
865-694	4	199	564	820	68.780%
865-694	5	173	760	969	78.431%
865-694	6	107	445	599	74.290%
865-694	7	154	668	869	76.870%
865-694	8	241	549	847	64.817%
865-694	9	237	546	834	65.468%
865-766	0	461	370	901	41.065%
865-766	1	700	300	1,000	30.000%
865-766	2	600	400	1,000	40.000%
865-766	3	800	200	1,000	20.000%
865-766	4	700	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	369	448	869	51.554%
865-769	1	38	721	776	92.912%
865-769	2	473	407	899	45.273%
865-769	3	365	500	922	54.230%
865-769	4	207	629	897	70.123%
865-769	5	332	538	923	58.288%
865-769	6	464	508	987	51.469%
865-769	7	264	637	951	66.982%
865-769	8	304	449	799	56.195%
865-769	9	304	544	898	60.579%
865-773	1	1,000	0	1,000	0.000%
865-909	0	411	419	894	46.868%
865-909	2	0	1	1	100.000%
865-909	4	0	1,000	1,000	100.000%
865-909	5	0	1,000	1,000	100.000%

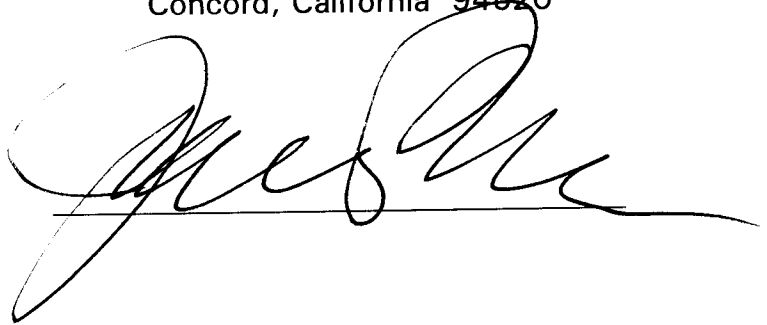
KNOXVILLE EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-909	6	500	500	1,000	50.000%
865-909	7	600	400	1,000	40.000%
865-909	8	0	700	700	100.000%
865-909	9	206	689	929	74.166%
865-970	0	76	909	995	91.357%
865-970	1	0	998	998	100.000%
865-970	2	573	388	985	39.391%
865-970	3	787	191	988	19.332%
865-970	4	840	147	994	14.789%
865-970	5	98	902	1,000	90.200%
865-970	6	122	873	998	87.475%
865-970	7	839	151	991	15.237%
865-970	8	0	997	997	100.000%
865-970	9	852	131	992	13.206%
865-971	0	0	1,000	1,000	100.000%
865-971	1	246	562	856	65.654%
865-971	2	10	988	1,000	98.800%
865-971	3	206	528	745	70.872%
865-971	4	353	493	903	54.596%
865-971	5	196	670	925	72.432%
865-971	6	70	889	973	91.367%
865-971	7	33	941	976	96.414%
865-971	8	0	1,000	1,000	100.000%
865-971	9	100	900	1,000	90.000%
865-974	8	0	1,000	1,000	100.000%
865-974	9	1	986	989	99.697%
865-985	0	1,000	0	1,000	0.000%
865-985	1	950	43	999	4.304%
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	140	760	1,000	76.000%
865-985	8	920	71	1,000	7.100%
865-985	9	992	7	1,000	0.700%
<b>Totals:</b>		137,871	391,933	550,976	71.134%

### CERTIFICATE OF SERVICE

I hereby certify that on April 19, 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 "Cheryl Dixon", is written over a horizontal line.