

**BellSouth Telecommunications, Inc.** 

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April 19, 2007

#### **VIA HAND DELIVERY**

electronically 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 The University of Tennessee Medical

Center

Docket No 07-00097

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

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 The University of Tennessee Medical Center

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 17, 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 a new code of 10,000 numbers necessary to meet the demands of its customer, The University of Tennessee Medical Center ("The University"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.
- 8. The code assignment request was for a new code of 10,000 numbers in the 865 NPA area code, in response to The University's request for a new NXX code (10,000 numbers). The University cited upgrade of its present phone system 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 The University 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 The University 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 17, 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 The University 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 KNVLTNMADS1 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 The University 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 The University'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 The University's needs, the NeuStar is preventing The University 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 The University in order that The University may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, AT&T Tennessee requests:

- 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 The University in the Knoxville rate center within the 865 NPA.

Respectfully submitted,

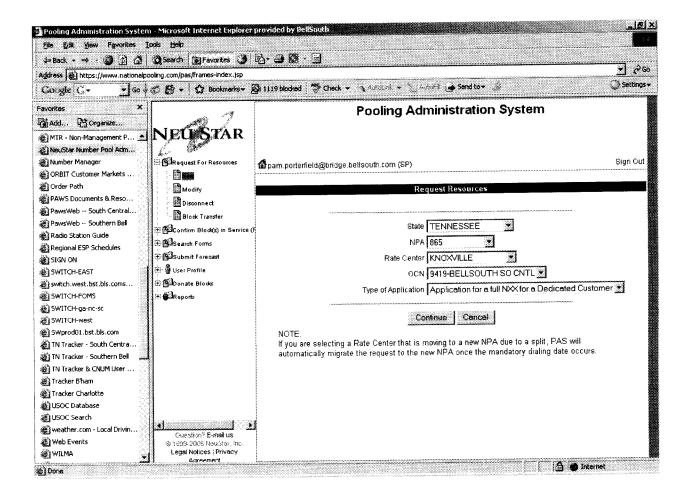
AT&T TENNESSEE

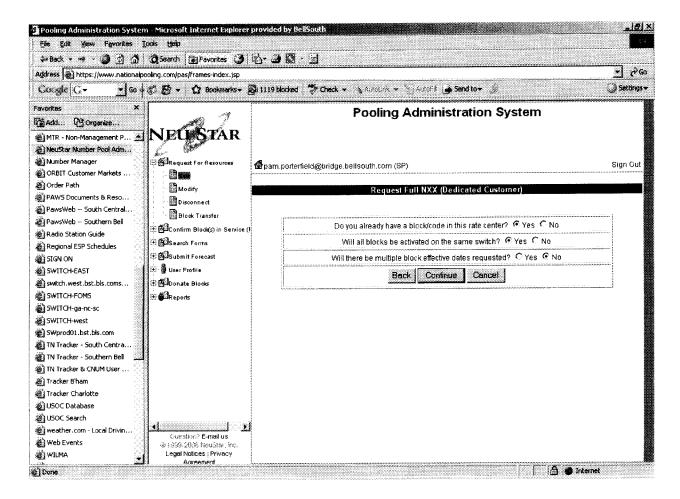
M. Hicks

Joelle Phillips

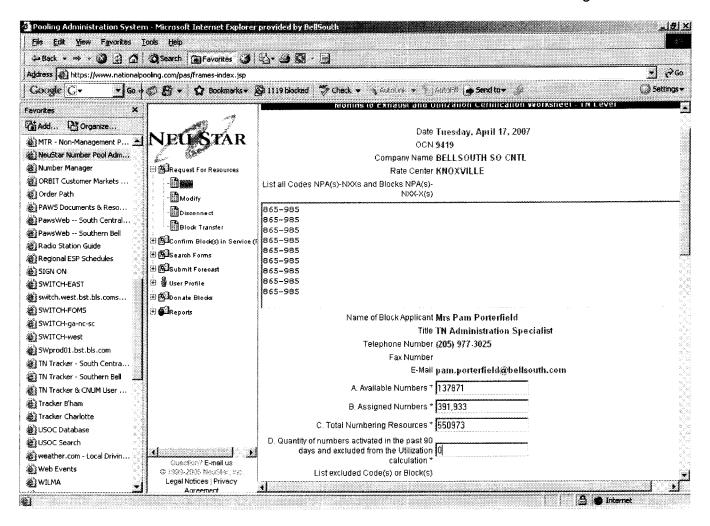
333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

(615) 214-6311

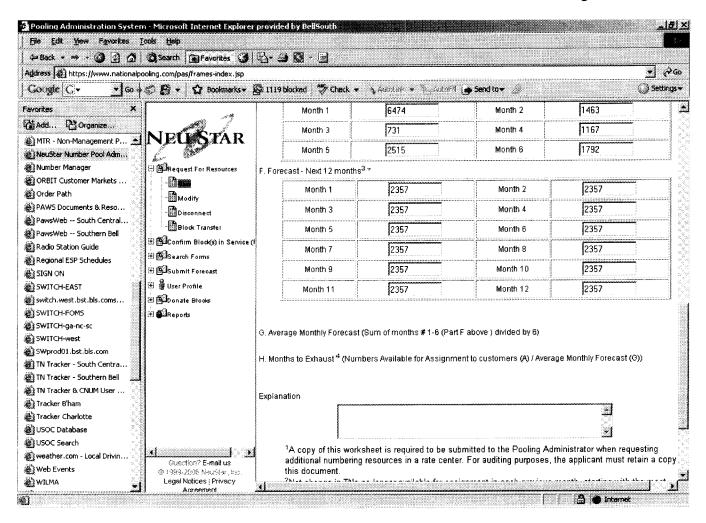




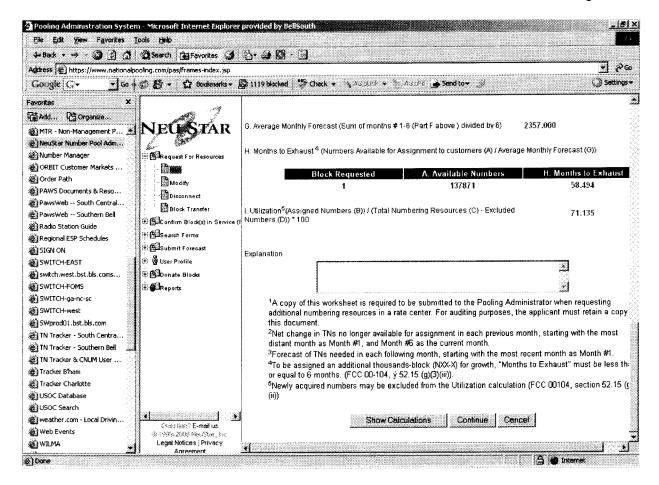
# Petition of AT&T Tennessee The University of Tennessee Medical Center Exhibit B Page 1 of 3



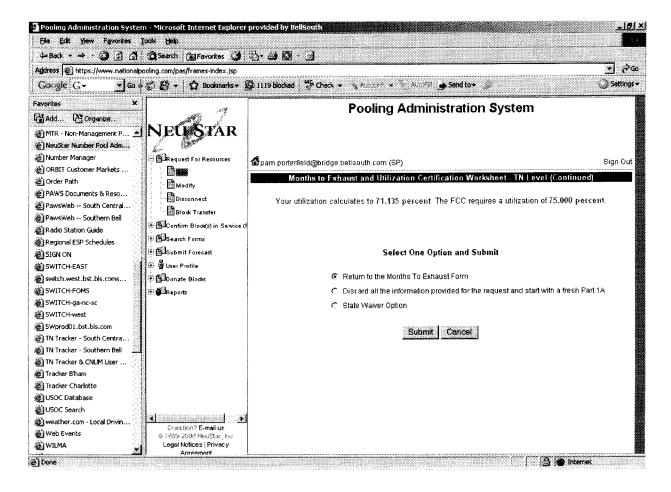
## Petition of AT&T Tennessee The University of Tennessee Medical Center Exhibit B Page 2 of 3



# Petition of AT&T Tennessee The University of Tennessee Medical Center Exhibit B Page 3 of 3



## Petition of AT&T Tennessee The University of Tennessee Medical Center Exhibit C



## THE UNIVERSITY OF TENNESSEE MEDICAL CENTER

University Memorial Hospital

Graduate School of Medicine

Petition of AT&T Tennessee The University of Tennessee Medical Center Exhibit D



1924 Alcoa Highway Knoxville, TN 37920-6999 (865) 544-9000

February 26, 2007

Theresa G. Sams
BellSouth Business
410 N. Cedar Bluff Road
Suite 300
Knoxville, TN 37923

Dear Theresa,

Thank you for your recent proposals and work on our BellSouth account. The University Health System, Inc. is considering the upgrade of its present phone system and overall phone services. In order to provide our healthcare organization with an overall structural improvement, we need to provide uniformity within our offices, patient rooms, and services. Harry Watson, Vice President of Facility Operations, and I are managing this project.

In order to proceed with our improvements and anticipated growth, we would like to request a new NXX (prefix) allowing us the full use and availability of up to 10000 numbers. We would like to have the numbers reserved or available to us by July 31, 2007. It is our understanding that this is not available right now and we would require an entirely new NPA/NXX to be opened for just our facilities, and that a request of this nature would require review. Please forward this request to the appropriate person(s), so that ample time can be given to our request. As discussed previously, we would like the change in dialing plan to coincide with the upgrade of our phone system and the installation of the multiple PRIs.

Thank you for your consideration in this matter and please forward this to the appropriate manager(s) who will be able to move this matter to completion.

Sincerely,

John H. Shearer

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Director - Telecommunications, Biomedical Services, PBX, AV

University Health System, Inc.

1924 Alcoa Highway

Knoxville, TN 37920

## TENNESSEE REGULATORY AUTHORITY

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



460 James Robertson Parkway Nachville, Tenessee 37243-0505

November 29, 2001

Ms. Cheryl Dixon
Senior Code Administrator
1800 Sutter Street
Suite: 570
Concord, CA 94520

RE: Denial of BellSouth's Central Office Code ("NXX") Assignment Request.

Dear Ms. Dixon:

On November 1, 2001, BellSouth Petitioned the Tennessee Regulatory Authority ("TRA") for Expedited Review of Growth Code Denial by the North American Numbering Plan Administration ("NANPA"), Docket No. 01-00957. BellSouth specifically requested the overturn of NANPA's denial, and order the issue of one growth code ("NXX") for the Chattanooga rate center in the 423 NPA.

BellSouth stated they requested a growth code in the 423 NPA in response to a request received from a customer, the University of Tennessee, Chattanooga ("UTC"), as they did not have sufficient numbering resources available to meet the customer's needs. BellSouth's also stated that the Chattanooga Rate Center's Months to Exhaust ("MTE") calculation was 31.88 months.

The TRA Staff ("Staff") verified that the MTE requirement six months cannot be met. Staff also verified that the Chattanooga rate center is a multiple switch rate center, and that the MTE has to be calculated on a rate center level rather than at switch level. Staff is also satisfied with the validity of UTC's request. In that the 423 NPA has a projected exhaust date for the 4th Quarter of 2004, and the current demands in the 423 NPA is 2.5 NXXs per month, it is unlikely that the assignment of one (1) NXX will have a material effect on the projected exhaust of the 423 NPA.

On November 20, 2001, the Directors of the Tennessee Regulatory Authority approved BellSouth's petition, and ordered the NANPA to issue BellSouth one growth code in the 423 NPA. The TRA Order will be provided once it is administratively processed.

Sincerely,

K D Wallet

K. David Waddell Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Pres 1-800-342-2359, Facsimile (615) 741-9953

www.state.tr.up/fft

### 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 Coming, 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 Coming, 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.
- 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

Derwa A. Digpen

Geneva S. Thigpen, Chief Clerk

£40801.62

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		100.000%		
865-215	3	0	1,000	•	100.000%		
	4	0	1,000		100.000%		
865-215 865-215	F-14	0	1,000	+ - · · · · · · · · · · · · · · · · · ·	100.000%		
	5 6	0	900	h	90.000%		
865-215 865-215	7	0	1,000		100.000%		
865-215		0:	1,000		100.000%		
	8	33	952	· · · · · · · · · · · · · · · · · · ·	96.162%		
865-215		593	313	<del></del>	33.512%		
865-219	0	100	900	1	90.000%		
865-219	1	100	900		90.000%		
865-219	2		1,000	*	100.000%		
865-219	3	103	895		89.500%		
865-219	4	103	889	alana and a same and a same and a same and a same a s	88.900%		
865-219	5	216	730		74.112%		
865-219	6	A COMPANY OF THE PARTY OF THE P	708		75.803%		
865-219	7	134	285		30.127%		
865-219	8	630	292		31.670%		
865-219	9	604			98.000%		
865-226	0	0	980	·	100.000%		
865-226	1	0	1,000				
865-226	2	1	999		99.900%		
865-226	3	0	1,000	4	100.000%		
865-226	4	0	1,000		100.000%		
865-226	5	1 <sub> </sub>	999		99.900%		
865-226	6	0	1,000		100.000%		
865-226	7		1,000		100.000%		
865-226	8	0	1,000		100.000%		
865-226	9	1,000	0		0.000%		
865-281	0	195	601		67.4529		
865-281	1	0	1,000		100.000%		
865-281	2	160	707	923	76.5989		

	KNOXVILLE EXCHANGE							
NPA-		Available	Assigned	Total Number				
NXX	X	Numbers	Numbers	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		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		80.464%			
865-450	3	97	879	982	89.511%			
	4	57	939		93.994%			
865-450	5	374	583	980	59.490%			
865-450				1,000	100.000%			
865-450	6	0	1,000		100.000%			
865-450	7	0	1,000	1,000				
865-450	8	80	874		89.641%			
865-450	9	566	319	L	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	*	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	+	62.227%			
865-470	9	207	575		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		64.079%			
865-521	1	293	665	960	69.271%			
865-521	2	143	785		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-		Available	•	Total Number				
NXX	X	Numbers	Numbers	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%			
	9	321	541	900	60.111%			
865-523	0	313	542	908	59.692%			
865-524	i	302	564	915	61.639%			
865-524	1	318	551	913	60.350%			
865-524	2	301	508	855	59.415%			
865-524	3		528	910	58.022%			
865-524	4	323 298	563	891	63.187%			
865-524	5	286	657	961	68.366%			
865-524	6			920	63.696%			
865-524	7	291	586	947	41.711%			
865-524	8	543	395		43.879%			
865-524	9	481	405	923	56.306%			
865-525	0	285	500	888				
865-525	1	281	568	904	62.832%			
865-525	2	298	527	878	60.023%			
865-525	3	318	519 570	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-		Available	Assigned	Total Number			
NXX	X	Numbers	Numbers	Resources	Utilizatio		
865-525	9	292	517	893	57.895%		
865-531	0	177	600	849	70.6719		
865-531	1	155	599	825	72.606%		
865-531	2	234	521	817	63.770%		
865-531	3	236	531	825	64.3649		
865-531	4	482	366	876	41.7819		
865-531	5	685	247	958	25.7839		
865-531	6	149	727	912	79.715%		
865-531	7	158	622	832	74.760%		
865-531	8	202	582	841	69.2039		
865-531	9	102	573	742	77.2249		
865-539	o	171	592	841	70.3929		
865-539	1	188	586	829	70.688%		
865-539	2	247	506	858	58.974%		
865-539	3	222	497	744	66.8019		
865-539	4	274	494	841	58.740%		
865-539	5	264	444	927	47.8969		
865-539	6	159	597	850	70.2359		
865-539	7	8.	288	298	96.6449		
865-539	8	53	787	948	83.0179		
865-539	9	195	562	821	68.4539		
865-540	0	17	981	999	98.1989		
865-540	1	252	549	831	66.0659		
865-540	2	300	700	1,000	70.000%		
865-540	3	107	866	986	87.830%		
865-540	4	192	735	957	76.8039		
865-540	5	308	570	900	63.3339		
865-540	5 6		985	985	100.0009		
		0		520	45.7699		
865-540	7	282	238	941	36.6639		
865-540	8	553	345				
865-540	9	29	961	997	96.3899		
865-541	0	0	999	1,000	99.900		
865-541	1	0	1,000	1,000	100.0009		
865-541	2	0	1,000	1,000			
865-541	3	0	1,000	1,000	100.0009		
865-541	4	165	833	999	83.3839		
865-541	5	114	491	610	80.4929		
865-541	6	264	644	915	70.3839		
865-541	7	0	1,000	1,000	100.0009		
865-541	8	0	1,000	1,000	100.0009		
865-541	9	0	1,000	1,000	100.0009		
865-544	0	338	489	918	53.2689		
865-544	1	340	441	878	50.2289		

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	i	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	<del></del>	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		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		55.310%		
865-546	9	322	492	878	56.036%		
865-549	0	0	1,000		100.000%		
865-549	1	62	836	999	83.684%		
865-549	2	0	999	+	99.900%		
865-549	3	0	1,000	1,000	100.000%		
			999	999	100.000%		
865-549	4	0		835	63.234%		
865-549	5	302	528		90.000%		
865-549	6	100	900	1,000			
865-549	7	382	517	919	56.257%		
865-549	8	0	1,000	1,000	100.000%		
865-549	9	303	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	<del></del>	67.730%		
865-558	4	170	451	622	72.508%		

KNOXVILLE EXCHANGE							
NPA- NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilizatior		
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		86.305%		
865-560	3	108	747	870	85.862%		
865-560	4	1	994		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		1,000	1,000	100.000%		
+		0		1,000	100.0007		
865-564	1	0	1,000		100.0007		
865-564	2	0	1,000	1,000			
865-564	3	0	1,000		100.000%		
865-564	4	0	1,000		100.000%		
865-564	5	0	1,000		100.000%		
865-564	6	0	1,000	1,000	100.000%		
865-564	<b>7</b>	0!	1,000	1,000	100.000%		
865-564	8	0	1,000	<del></del>	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	82.7449		
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	<del>+</del>	82.0029		
865-577	1	98	714		76.282%		
865-577	2	135	721	942	76.539%		
865-577	3	111	726		77.897%		
865-577	4	110	744		80.0869		
865-577	5	104	756		80.8569		
865-577	6	123	737	was common as a construction of the constructi	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	Utilizatio			
865-577	9	130	730	936	77.9919			
865-579	0	178	687	940	73.085%			
865-579	1	118	733	L	78.6489			
865-579	2	99	801	963	83.1789			
865-579	3	120	736	926	79.4829			
865-579	4	133	699	920	75.9789			
865-579	5	142	689	912	75.5489			
865-579	6	144	689	\$	73.769			
865-579	7	81	752	881	85.3589			
865-579	8	43	902	954	94.5499			
865-579	9	488	414	943	43.902°			
865-582	0 :	0	100		100.000			
865-582	2	4	993	i	99.300			
865-582	3	328	666	·	66.600°			
865-582	4	70	930		93.000			
865-583	0	408	444		49.169°			
865-583	1	73	761	939	81.044°			
865-583	2	43	957		95.700°			
865-583	3	597	265		28.373°			
865-583	4	331	666		66.733°			
	5	0	1,000		100.000			
865-583	6		1,000		100.000			
865-583		398	479	Annual Control of the	48.978			
865-583	7		719	<del> </del>	75.605			
865-583	8	95			63.362°			
865-584	0	226	524		60.306			
865-584	1	258	512	4				
865-584	2	302	459		55.3689			
865-584	3	271	476		58.984			
865-584	4	250	501	<del></del>	61.322			
865-584	5	303	490		56.387			
865-584	6	254	532		60.800			
865-584	7	278	502	and the second s	56.723			
865-584	8	269	484		57.757			
865-584	9	299	488		56.943			
865-588	0	222	563		67.104			
865-588	1	258	532		63.108			
865-588	2	245	484		58.809			
865-588	3	270	558	<del></del>	64.509			
865-588	4	150	666	<del>+</del>	74.413			
865-588	5	250	573		66.473			
865-588	6	269	547	4	62.443			
865-588	7	267	552		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		78.444%			
865-595	4	180	751	981	76.555%			
	5	0	1,000		100.000%			
865-595		0	1,000		100.000%			
865-602	0	0	1,000		100.000%			
865-602	1		468	a	50.759%			
865-602	2	326		to an account of the comment of the	84.162%			
865-602	3	147	829		44.167%			
865-602	4	536	424		60.000%			
865-602	5	400	600	<del></del>				
865-602	6	608	381	997	38.215%			
865-602	7	108	827		86.870%			
865-602	8	0	1,000		100.000%			
865-602	9	0	1,000		100.000%			
865-609	0	548	366		38.936%			
865-609	1	618	309		32.356%			
865-609	2	650	296		30.390%			
865-609	3	254	686		71.384%			
865-609	4	359	94		19.028%			
865-609	5	284	712		71.271%			
865-609	6	465	480		48.930%			
865-609	7	663	305		31.186%			
865-609	8	657	292		30.072%			
865-609	9	363	505		54.069%			
865-631	0	0	1,000		100.000%			
865-631	1	0	1,000		100.000%			
865-631	2	0	1,000		100.000%			
865-631	3	0	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-		Available	•	Total Number				
NXX	X	Numbers	Numbers	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		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		56.796%			
865-637	9	356	455	·	52.239%			
865-656	0	999	1	1,000	0.100%			
865-656	1	993	6	+	0.600%			
865-656	2	991	5	A comment of the comm	0.501%			
865-656	3	994	6		0.600%			
865-656	4	992	7		0.700%			
865-656	5	996	3	1,000	0.300%			
865-656	6	996	3		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	Utilizatio		
		989	9	1,000	0.900%		
865-656	9	299	468	832	56.250%		
865-670 865-670	0	264	524		62.830%		
865-670	2	140	797	962	82.848%		
865-670	3	131	629	779	80.745%		
865-670	4	58	840	914	91.9049		
865-670	5	0	1,000	1,000	100.000%		
	6	54	795	860	92.4429		
865-670	7	81	842		89.195%		
865-670		155	709		77.6569		
865-670	8	277	497	837	59.379%		
865-670	9				53.975%		
865-673	0	333	482		100.0009		
865-673	1	0	1,000		93.2789		
865-673	2	54	902		65.2519		
865-673	3	266	584		58.9369		
865-673	4	337	554	<del></del>			
865-673	5	115	851		86.2219		
865-673	6	345	489	+ ·	51.7469		
865-673	7	100	900	+	90.000		
865-673	8	375	452		49.670		
865-673	9	344	538	4	56.572°		
865-686	0	365	531		57.530°		
865-686	1	134	760	+	82.430		
865-686	3	324	405		41.925		
865-686	4	622	310		31.6339		
865-686	7	354	582		59.4489		
865-686	9	832	121		12.565		
865-687	0	142	719		77.312		
865-687	1	144	680		75.724		
865-687	2	110	733		80.549		
865-687	3	95	739		81.567		
865-687	4	78	742		82.262		
865-687	5	134	700		77.008		
865-687	6	112	715		78.485		
865-687	7	119	694		77.111		
865-687	8	96	727		80.420		
865-687	9	109	722		78.564		
865-688	0	109	711		79.888		
865-688	1	102	714	+	80.952		
865-688	2	147	718		78.556		
865-688	3	126	692		78.726		
865-688	4	106	720	-	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	74.6789		
865-689	2	124	714	886	80.5879		
865-689	3	173	666	893	74.5809		
865-689	4	122	708	888	79.7309		
865-689	5	128	713	900	79.2229		
865-689	6	114	692	888	77.9289		
865-689	7	162	650	880	73.8649		
865-689	8	515	380		41.0379		
865-689	9	150	701	928	75.539°		
		190	589	837	70.370		
865-690	0	141	648	÷	77.143°		
865-690	1		571	830	68.795°		
865-690	2	213	605		72.110°		
865-690	3	173	633		76.542°		
865-690	4	130	584		71.833		
865-690	5	181	584	ļ — — ·····	72.188		
865-690	6	165			71.087		
865-690	7	184	595	829	68.878		
865-690	8	203	571	<u> </u>	72.325		
865-690	9	165	588		75.307		
865-691	0 +	160	613				
865-691	1	139	610		74.300		
865-691	2	190	559		67.676		
865-691	3	202	546		66.262 70.037		
865-691	4	186	568	+			
865-691	5	201	568		69.100		
865-691	6	168	613		73.945		
865-691	7	161	616		73.772		
865-691	8	155	647		75.673		
865-691	9	375	431		51.066		
865-692	0	274	522	<del></del>	62.143		
865-692	1	347	460		54.502		
865-692	2	88	690		75.824		
865-692	3	365	499		54.655		
865-692	4	169	730		76.520		
865-692	5	172	687		75.246		
865-692	6	177	669		77.163		
865-692	8	333	492		54.727		
865-692	9	242	542	851	63.690		

			LLE EXCH		
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		156	619	840	73.690%
865-693	2	168	639	861	74.216%
		162	635	845	75.148%
865-693	5	241	577	864	66.782%
865-693		197	552	818	67.482%
865-693	6		580	835	69.461%
865-693	7	199		858	73.427%
865-693	8	190	630	848	67.217%
865-693	9	204	570	847	67.060%
865-694	0	224	568 566		78.720%
865-694	1	136	395		43.075%
865-694	2	99	489	855	57.193%
865-694	3	307			68.780%
865-694	4	199	564		78.431%
865-694	5	173	760		74.290%
865-694	6	107	445	i	
865-694	7	154	668		76.870%
865-694	8	241	549	<u> </u>	64.8179
865-694	9	237	546		65.468%
865-766	0	461	370		41.065%
865-766	1	700	300		30.000%
865-766	2 3	600	400	I	40.000%
865-766		800	200		20.000%
865-766	4	700	300		30.000%
865-766	5	1,000	0		0.000%
865-766	6	34	403	The state of the s	43.010%
865-766	8	100	204		67.105%
865-769	0	369	448		51.5549
865-769	1	38	721		92.9129
865-769	2	473	407		45.2739
865-769	3	365	500		54.2309
865-769	4	207	629		70.1239
865-769	5	332	538		58.2889
865-769	6	464	508	· · · · · · · · · · · · · · · · · · ·	51.469
865-769	7	264	637		66.9829
865-769	8	304	449		56.1959
865-769	9	304	544		60.579°
865-773	1	1,000	C		0.000
865-909	0	411	419	894	46.868°
865-909	2	0	1	1	100.000
865-909	4	0	1,000		100.000
865-909	5	0	1,000	1,000	100.000

		KNOXVI	LLE EXCH	ANGE	
NPA- NXX	x	Available Numbers	Assigned Numbers	Total Number Resources	Utilizatio
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	39.3919
865-970	3	787	191	988	19.3329
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	15.2379
865-970	8	0	997		100.000%
865-970	9	852	131	992	13.2069
865-971	0	0	1,000	4	100.000%
865-971	1	246	562		65.654%
865-971	2	10	988	<u> </u>	98.800%
865-971	3	206	528	<u> </u>	70.8729
865-971	4	353	493		54.5969
865-971	5	196	670		72.4329
865-971	6	70	889		91.3679
865-971	7	33	941	976	96.4149
	8	0	1,000	and the second s	100.000°
865-971 865-971	part -	100	900		90.000
865-974	9	0	1,000	<u> </u>	100.000
865-974	9	1	986		99.697
865-985	0	1,000	0	+	0.000
865-985	1	950	43		4.304
865-985	2	0	1,000		100.000
865-985	3	0	1,000		100.000
865-985	4	0	1,000	.+	100.000
865-985	5	0	1,000		100.000
865-985	6	0	1,000		100.000
865-985	7	140	760	the second secon	76.000
865-985	8	920	71		7.100
865-985	9	992	· · · · · · · · · · · · · · · · · · ·	1,000	0.700
Γotals:		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:						
<ul><li>[ ] Hand</li><li>[ ] U.S. Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight Mail</li><li>[ ] Electronic Mail</li></ul>	Ms. Cheryl Dixon Senior Code Administrator Number Pooling Administrator 1800 Sutter Street, Suite 570 Concord, California 94520					