



Joelle Phillips
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January 11, 2008

VIA HAND DELIVERY

Hon. Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

filed electronically in docket office on 01/11/08

RE: *Petition for Expedited Review of Growth Code Denial by the Number Pooling
Administrator Relating to Nissan North America, Inc.*
Docket No 08-00010

Dear Chairman Roberson:

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

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Nissan North America, Inc.*

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 615 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 Smyrna 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 December 8, 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 in 615-NXX-2000-3999 range necessary to meet the demands of its customer, Nissan North America, Inc. ("Nissan"). 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 615-NXX-2000-3999 range in the 615 NPA area code, in response to Nissan's request for 2,000 consecutive DID numbers in 615-NXX-2000-3999 range. Nissan cited installation of new fax server as its basis for this request. However, AT&T

Tennessee did not have sufficient number resources available within its inventory in the Smyrna rate center, and, accordingly, AT&T Tennessee was unable to provide Nissan 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 Smyrna rate center had an MTE of approximately 12.6 months.

11. Despite the fact that AT&T Tennessee's Smyrna rate center may not exhaust for 12.6 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Nissan within the Smyrna rate center. This is because the individual switch that serves this customer within the Smyrna rate center does not have sufficient number resources to meet the customer's request.

12. On or about December 8, 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 Nissan is attached as Exhibit "D").

14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2007 NRUF and NPA Exhaust Analysis dated October, 2007, the projected exhaust date of the 615 NPA is the First Quarter 2013. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 615 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 Smyrna, including the SMYRTNMADSO 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 Nissan 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 Nissan'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 Nissan's needs, the NeuStar is preventing Nissan 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

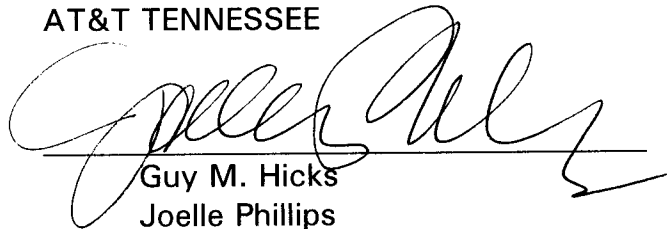
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct the NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of Nissan in order that Nissan may receive the service of its choice from the provider 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 Nissan in the Smyrna rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, stylized handwritten signature in black ink, appearing to read 'Guy M. Hicks', is written over a horizontal line.

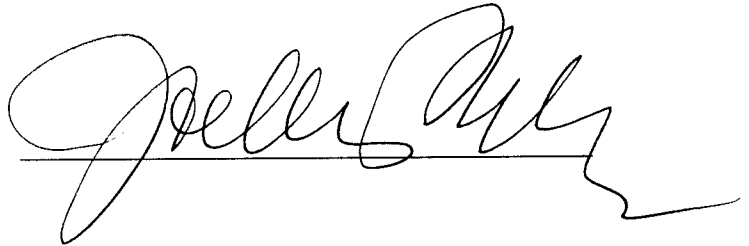
Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6311

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2008, 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.

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- Order Path
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- PAWS Documents & Resources
- PawsWeb -- South Central Bell
- PawsWeb -- Southern Bell
- Radio Station Guide
- Regional ESP Schedules
- SIGN ON

Request For Resources

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

Sign Out

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

Pooling Administration System

Request Resources

State: TENNESSEE

NPA: 615

Rate Center: SMYRNA

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.

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- New Natalie's Bridal Gown De...
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Type of Application : New

1.1 Contact Information :

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

Block Applicant :

Company Name BELL SOUTH SO 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

E-mail pam.porterfield@bellsouth.com

Pooling Administrator ¹¹:

Contact Name Ms Genevieve Paulino

Contact Address 1800 Sutter St. Ste. 780

City Concord

State CA

Zip 94520

Telephone (925) 363-7652

Fax (925) 363-7683

E-mail genevieve.paulino@neustar.biz

1.2 General Information

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- PawsWeb -- Southern Bell
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- Regional ESP Schedules
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1.2 General Information

LRN Needed ⁱⁱⁱ No

NPA 6 15 LATA 470

OCN ^{iv} 9419-BELLSOUTH SO
CNTL

Parent Company OCN * 9419

Number of Thousands-Blocks Requested 2

Switch Identification (Switching Identity/PO) * SMYRTNMADS0 City or Wire Center Name

Rate Center * SMYRNA Rate Center Sub Zone

1.3 Dates

Date of Application ^{vi} Saturday, December 8, 2007

Requested Block Effective Date ^{vii} 8 Jan 2008

Request Expedited Treatment ☒ Yes ☐ No

1.4 Type of Service Provider Requesting the Thousands-Block

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

b) Primary type of service Blocks to be used for * Wireline

c) Thousands-Block(s) (NPA-NXX-X) assignment preference

Click here to see the available blocks in the

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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.

			615-967-2 615-967-3
			Delete

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

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

N/A

1.5 Type of Request

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

Question? Email us.
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List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

615-220
615-223
615-267 (6-7)
615-355
615-459
615-768 2,7

Name of Block Applicant Mrs Pam Porterfield
Title TN Administration Specialist
Telephone Number (205) 977.9825
Fax Number
E-Mail pam.porterfield@bellsouth.com

A. Available Numbers * 6877
B. Assigned Numbers * 31720
C. Total Numbering Resources * 40946
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation * 0

List excluded Code(s) or Block(s)

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E. Growth History - Previous 6 months² *

Month 1	220	Month 2	675
Month 3	230	Month 4	221
Month 5	121	Month 6	293

F. Forecast - Next 12 months² *

Month 1	293	Month 2	293
Month 3	2293	Month 4	293
Month 5	293	Month 6	293
Month 7	293	Month 8	293
Month 9	293	Month 10	293
Month 11	293	Month 12	293

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

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

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Request For Resources

- Modify
- Disconnected
- Block Transfer

Confirm Block(s) in Service

Search Forms

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Reports

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 626.333

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

Block Requested	A. Available Numbers	H. Months to Exhaust
1	6877	10.980
2	7877	12.576

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 77.468

Explanation

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

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

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

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

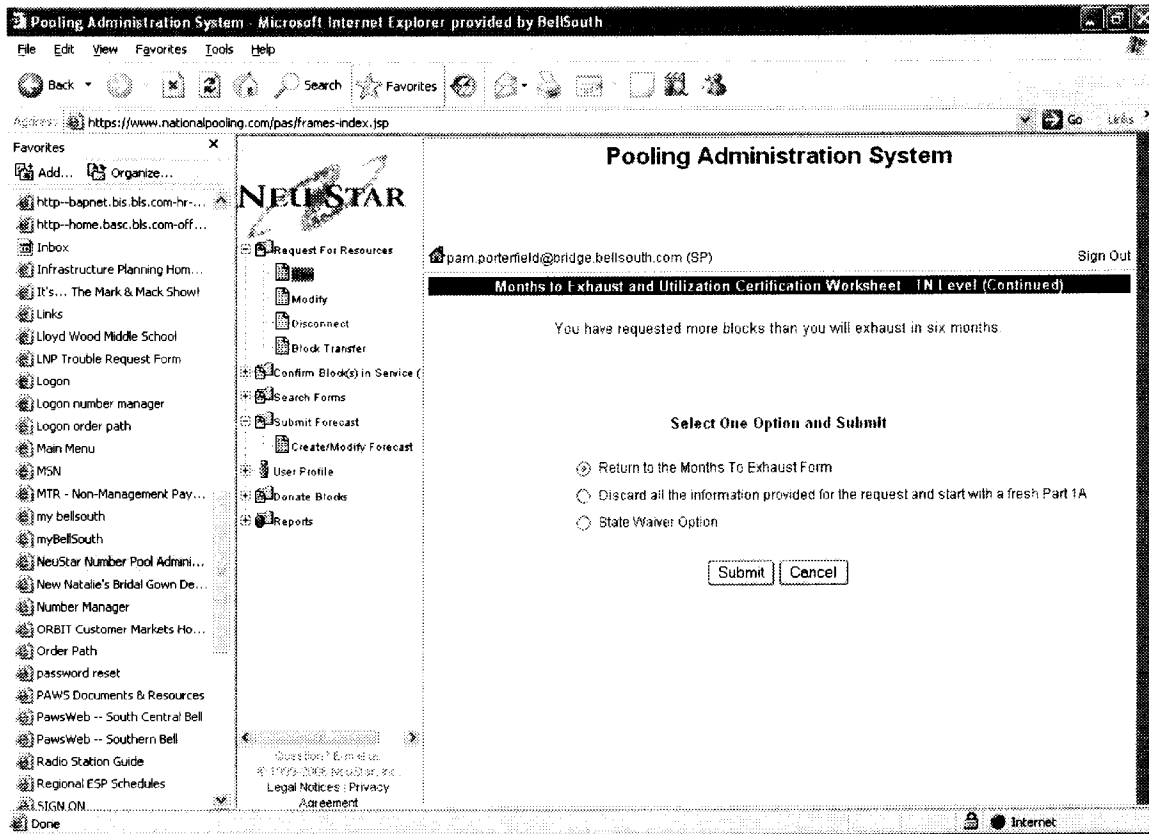
⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (3)(i)).

Show Calculations Continue Cancel

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Petition of AT&T Tennessee
Nissan North America, Inc.
Exhibit C



NISSAN

NISSAN NORTH AMERICA, INC.

Corporate Office
P.O. Box 685001
Franklin, TN 37068-5001

Telephone: (615) 725-1000

November 29, 2007

AT&T

ATTN: Doug Arnold, Cindy Pickersgill & Ed McCracken
333 Commerce Street
Nashville, TN 37201

Dear AT&T Team,

Per our recent conversations, Nissan needs to acquire 2,000 consecutive DID's in the 615 area code for our Smyrna, TN location. We are in the process of relocating our RightFax server from Torrance, CA to Smyrna. During this process we are building an enterprise class server in Smyrna to accommodate our existing RightFax users and hundreds of additional users in support of our aggressive Virtual Office initiative.

In order to accomplish this we will need a block of 2,000 consecutive DID's (preferably 615-XXX-2000 – 3999 to). We need to this done by mid December, so your best efforts are greatly appreciated.

Thank you for your assistance with this effort.

Sincerely,



Dave Damron
IS Manager, Voice Services & Technologies
Infrastructure

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 4th Quarter of 2004, and the current demands in the 423 NPA is 2.5 NXXs per month, it is unlikely that the assignment of one (1) NXX will have a material effect on the projected exhaust of the 423 NPA.

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

Sincerely,

A handwritten signature in dark 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

**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.,)	ORDER RULING ON THE
for Review of NANPA Denial of Application)	BELLSOUTH PETITION
for Numbering Resources	

BY THE COMMISSION: On March 6, 2001, BellSouth Telecommunication, Inc. (BellSouth) requested that the Commission review the North American Numbering Plan Administrator's (NANPA) decision denying the reservation of two central office codes (NXXs) in the 910 and 836 Numbering Plan Areas (NPAs). Reservation of one NXX was requested for Guilford County Government and one NXX was requested for Corning, Inc., from NANPA.

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

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

WHEREUPON, the Commission now reaches the following

CONCLUSIONS

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

IT IS, THEREFORE, ORDERED as follows:

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

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

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

ISSUED BY ORDER OF THE COMMISSION.

This the 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION



Geneva S. Thigpen, Chief Clerk

SMYRNA EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-220	0	260	503	828	60.749%
615-220	1	378	514	936	54.915%
615-220	2	278	588	929	63.294%
615-220	3	67	852	957	89.028%
615-220	4	417	471	937	50.267%
615-220	5	324	565	947	59.662%
615-220	6	230	690	966	71.429%
615-220	7	247	734	1,000	73.400%
615-220	8	68	840	971	86.509%
615-220	9	392	474	940	50.426%
615-223	0	62	750	915	81.967%
615-223	1	347	428	811	52.774%
615-223	2	109	888	998	88.978%
615-223	3	0	987	1,000	98.700%
615-223	4	0	1,000	1,000	100.000%
615-223	5	81	548	694	78.963%
615-223	6	59	780	925	84.324%
615-223	7	383	498	935	53.262%
615-223	8	31	871	961	90.635%
615-223	9	290	587	941	62.380%
615-267	6	801	199	1,000	19.900%
615-267	7	500	500	1,000	50.000%
615-355	0	221	567	923	61.430%
615-355	1	38	758	852	88.967%
615-355	2	3	985	995	98.995%
615-355	3	6	975	992	98.286%
615-355	4	150	708	937	75.560%
615-355	5	59	700	837	83.632%
615-355	6	37	802	918	87.364%
615-355	7	245	592	906	65.342%
615-355	8	55	833	947	87.962%
615-355	9	64	791	927	85.329%
615-459	0	237	611	933	65.488%
615-459	1	5	779	794	98.111%
615-459	2	45	811	931	87.111%
615-459	3	46	804	924	87.013%
615-459	4	40	824	929	88.698%
615-459	5	54	798	922	86.551%
615-459	6	40	811	934	86.831%
615-459	7	52	791	929	85.145%
615-459	8	113	764	936	81.624%
615-459	9	43	749	889	84.252%

SMYRNA EXCHANGE					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-768	2	0	1,000	1,000	100.000%
615-768	7	0	1,000	1,000	100.000%
TOTALS:		6,877	31,720	40,946	77.468%