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**BY OVERNIGHT MESSENGER**

June 5, 2008

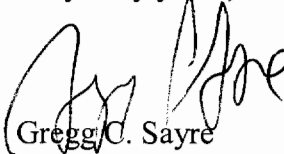
Tennessee Regulatory Authority  
**Attn: Ms. Sharla Dillon, Dockets Manager**  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**RE: Petition of Citizens Telecommunications Company of Tennessee for  
Expedited Review of Central Office Code Denial;  
Docket No. 08-00096**

Dear Ms. Dillon:

Please find enclosed for filing the original and 12 copies of the above-referenced petition by which Citizens Telecommunications Company of Tennessee requests the Authority to review and overrule the denial of the Number Pooling Administrator of Citizens' application for additional thousand number blocks to serve the Cookeville Regional Medical Center in Cookeville, Tennessee.

Very truly yours,

  
(Gregg C. Sayre  
Assistant Secretary

GCS/hmj  
Encl. (original + 12 copies)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE: PETITION FOR EXPEDITED  
REVIEW OF GROWTH THOUSAND  
BLOCKS BY THE NUMBER POOLING  
ADMINISTRATION RELATING TO  
COOKEVILLE REGIONAL MEDICAL  
CENTER**

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**DOCKET NO.** \_\_\_\_\_

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**PETITION OF CITIZENS TELECOMMUNICATIONS COMPANY OF  
TENNESSEE, LLC FOR EXPEDITED  
REVIEW OF CENTRAL OFFICE CODE DENIAL**

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Citizens Telecommunications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee ("Frontier"), pursuant to rules adopted by the Federal Communications Commission for challenging determination of the Number Pooling Administrator ("Neustar"), petitions the Tennessee Regulatory Authority for an expedited review of NeuStar's denial of Frontier's application for additional blocks in the 931 area code and 783 central office code.

1. Frontier is a local exchange carrier providing telecommunications services in Tennessee under the jurisdiction of the Tennessee Regulatory Authority.
2. NeuStar is an independent, non-government entity that is responsible for administering and managing numbering resources in pooling areas. *See* 47 C.F.R. § 52.13 (a) and (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 00-249" 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 00-249, 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 the existing telephone numbers and to slow further exhaustion of existing numbers under the North American Numbering Plan.
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 to NeuStar. The FCC further required that to qualify for access to new numbering resources, applications must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application.
6. In addition to the months-to-exhaust (“MTE”) requirement described above, the FCC’s rules also require carriers to meet a rate center utilization threshold of 60 percent to receive additional numbering resources in a given rate center. FCC 00-249 at ¶22; FCC 01-362 ¶¶50-52. The utilization threshold increases by five percent per year until it reaches a maximum 75 percent. Based on the FCC’s orders, carriers must meet both the six-month MTE requirement and the utilization threshold on a rate center basis to obtain additional number resources. *Id.* ¶29.
7. On May 8, 2008, Frontier submitted a National Pooling Request for 3 additional thousand blocks (3,000 numbers) necessary to meet the increased telephone number needs of the Cookeville Regional Medical Center (*Exhibit A*). Exhibit A also includes Frontier’s MTE calculations.

8. The assignment request made on behalf of the Cookeville Regional Medical Center is for 3,000 additional telephone numbers in the 931 area code. Frontier currently has numbers available in the 931-646 code, but these numbers do not meet the customer's needs for expansion. The Cookeville Regional Medical Center is currently using 1400 numbers in the 931-646 code and has an immediate need for a total of 3,000 numbers in blocks within the same central office code, preferably using the 2x, 4x, and 5x thousand groups to support a new patient tower. The Cookeville Regional Medical Center plans to consolidate its existing numbers into the new number blocks, and upon completion of the transition will return its existing numbers in the 2x and 5x thousands groups in the 931-646 code.
9. Based on the Cookeville Rate Center data that was used to calculate Frontier's MTE, Frontier's numbering resources would not exhaust for several years, but the methodology used in the calculation does not take into account the customer's short-term need to have sufficient numbering resources to add its existing services to the new number ranges. The calculation also does not take into account the customer's return of its existing numbers.
10. Frontier is unable to fulfill the customer's needs by assigning additional numbers in the 931-646 code because the available consecutive numbers in that exchange conflict with the customer's PBX programming. However, thousand number blocks that meet the customer's needs are available in the 931-783 code.
11. On May 8, 2008, Frontier's request was denied on the grounds that Frontier did not meet the utilization threshold required in the Central Office Code (NXX) Guidelines. This decision is attached hereto as ***Exhibit B***.
12. As results of the denial of Frontier's request for additional numbering resources, Frontier is unable to provide the telecommunications services requested by its customer in Tennessee.

13. Under previous procedures used by the North American Numbering Plan Administration (“NANPA”), waivers or exceptions were typically granted in any case 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, however, NeuStar looks at the MTE criteria and utilization threshold for the rate center and allows no exceptions. By refusing to consider the circumstances of each case, NeuStar’s procedure may result 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.
14. Frontier’s inability to provide this large business customer with the requested numbers in new thousands blocks prevents Frontier from providing the quality of service this customer desires and expects. Correspondence from the Cookeville Regional Medical Center describing its request is attached as *Exhibit C*.
15. Both the FCC Order 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* 47 C.F.R. §52.15 (g)(4).
16. This Authority has previously received similar requests from BellSouth Telecommunications, Inc. in which BellSouth asked the Authority to overrule a decision of NANPA and NeuStar. *See* Docket 03-00482 and Docket 03-00591. In both cases, the Authority granted BellSouth’s request. State commissions in North Carolina, Florida, and Louisiana have also granted such request from BellSouth and from US LEC. The Authority also granted previous Frontier requests for central office codes to serve St. Mary’s Hospital in Powell. *See* Docket 04-00254 and Docket 06-00257. Frontier’s additional request in this case is due to the customer’s significant expansion of its health care facilities and its

need to consolidate all of its numbers into the same central office codes and number blocks.

17. Frontier seeks the Authority's review of NeuStar's decisions to withhold numbering resources from it on the grounds that the CO Code Administration database denial (1) violates the rules and orders of the FCC which grant carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need and (2) interferes with Frontier's ability to serve its customers within Tennessee. As the FCC has stated, "Under 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 Cookeville Regional Medical Center's needs, the decision is preventing the customer from obtaining the service of its choice from its carrier of choice, Frontier.

**Relief Sought**

For these reasons, Frontier requests that the Authority review the decision of NeuStar to deny Frontier's request for additional numbering resources and direct NeuStar to provide three additional thousands blocks to meet the specific requirements of the Cookeville Regional Medical Center in Cookeville, Tennessee.


Respectfully submitted,  
Citizens Telecommunications Company of  
Tennessee, LLC

By: \_\_\_\_\_


Gregg C. Sayre  
Assistant Secretary


# **Exhibit A**


# Pooling Administration System


 Teresa.M.Smith@frontiercorp.com (SP)


Time : 05/08/2008 02:36:59 PM EDT


 Sign Out


 Individual Block Requests


 New Block Request


 New Block Reservation


 Assign/Cancel Reservation


 Block Modification


 Block Disconnect


 Saved Block Requests


 Modify Pending Request


 CO/NXX Code Requests


 Confirm Resources In Service


 Donate Blocks

 Submit Forecast

 Create/Modify Forecast

 Search Forms

 Reports

 User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level<sup>1</sup>

Date Thursday, May 8, 2008

OCN 4336

Company Name FRONTIER COMM OF TN

Rate Center COOKEVILLE

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

Name of Block Applicant Teresa Smith

Title Sr. Network Engineer - Number Planning

Telephone Number 585-777-7572

Fax Number 585-777-1177

E-Mail Teresa.M.Smith@frontiercorp.com

A. Available Numbers \* 29637

B. Assigned Numbers \* 35854

C. Total Numbering Resources \* 78000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \* 25

List excluded Code(s) or Block(s)



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

Month 1	25	Month 2	30
Month 3	42	Month 4	21
Month 5	13	Month 6	36

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

Month 1	250	Month 2	250
Month 3	250	Month 4	250
Month 5	250	Month 6	250
Month 7	250	Month 8	250
Month 9	250	Month 10	250
Month 11	250	Month 12	250

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above ) divided by 6) 250.0

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	29637	118.548
2	30637	122.548

	<p>3</p> <p>31637</p> <p>126,548</p>	<p>I. Utilization<sup>5</sup>(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100</p> <p><b>45.981</b></p> <p>Explanation</p> <div data-bbox="430 483 673 1291" style="border: 1px solid black; height: 385px; width: 150px; margin: 10px auto;"></div> <div data-bbox="722 535 771 1228" style="text-align: center; margin: 10px auto;"> <span>Show Calculations</span> <span>Continue</span> <span>Cancel</span> <span>Save</span> </div>
<p><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.</p> <p><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.</p> <p><sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.</p> <p><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)).</p> <p><sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))</p> <div data-bbox="1136 934 1201 1186" style="text-align: center; margin-top: 20px;"> <p>Question? Email us</p> <p>© 1997-2012 NeuStar, Inc.</p> <p>Legal Notice</p> </div>		

# **Exhibit B**

# Pooling Administration System

Teresa.M.Smith@frontiercorp.com (SP) • Sign Out

Time : 05/08/2008 02:37:17 PM EDT

New Block Request

Assign/Cancel Reservation

Block Modification

Block Disconnect

Saved Block Requests

Modify Pending Request

CO/XXX Code Requests

Confirm Resources In Service

Donate Blocks

Submit Forecast

Create/Modify Forecast

Search Forms

Reports

User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup>

Your Utilization calculates to **45.981%**. The FCC required the utilization of **75.000%**.  
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

☒ Return to the Months To Exhaust Form

☐ Need to request a State Waiver

☐ Received a State Waiver

Submit

Cancel

Question? Email us  
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Legal Notice

# **Exhibit C**

**Officers of the Board of Trustees**

Richard Grogan  
Chairman of the Board

Steve Flatt, M.D.  
Vice-Chairman of the Board

Bernard Mattingly  
Chief Executive Officer



142 West Fifth Street • Cookeville, TN 38501  
931.528.2541

**Medical Staff Officers**

Timothy Fournet, M.D.  
President of Medical Staff

Tim R. Collins, M.D.  
Vice-President of Medical Staff

Joseph A. Jestus, M.D.  
Secretary of Medical Staff



5/20/2008

Re: New NXX Request for Cookeville Regional Medical Center

Dear Sir or Madam:

Cookeville Regional Medical Center currently uses 1400 DID numbers. They are 931-646-2000 thru 2999 and 931-646-5600 thru 5999. We are nearing the completion of construction on a new patient tower that will require more DID numbers. We need a new range of numbers from 4000 thru 4999, however this range is not available in the 931-646 exchange. The 9000 range is available, but it conflicts with our PBX programming as we dial 9 for an outside line.

To simplify the future dialing plan for our customers in the Upper Cumberland region we need all of our DID numbers with the same NXX, specifically 2000 thru 2999, 4000 thru 4999 and 5600 thru 5999. Our plan is to fully transition to the new NXX and return 931-646-2 and 931-646-5 back to Frontier Communications by Sept. 2009.

CRMC and its employee's, doctors, visitors and patients would experience great hardship by not having a single NXX. We await a speedy reply to our request.

Thanks,

David Kindrick  
Telecom Engineer  
Cookeville Regional Medical Center  
931-646-5678  
931-646-5688 Fax