



Guy M. Hicks  
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June 16, 2008

VIA HAND DELIVERY

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

filed electronically in docket office on 06/16/08

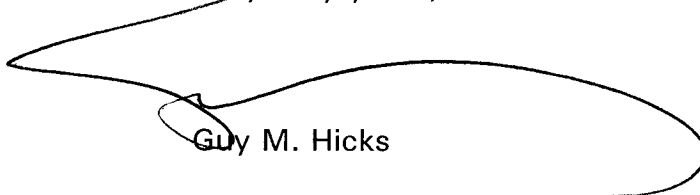
Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to LSI Industries, Inc.*  
Docket No. 08-00099

Dear Chairman Roberson:

Enclosed are the original and four copies of AT&T Tennessee's *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to LSI Industries, Inc.*

Thank you for your attention to this matter.

Very truly yours,



Guy M. Hicks

GMH:rlc

713756

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

In Re:       *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to LSI Industries, 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 931 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 Tullahoma 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 June 6, 2008, 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 200 consecutive DID numbers necessary to meet the demands of its customer, LSI Industries, Inc. ("LSI"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 200 consecutive DID numbers in the 931 NPA area code, in response to LSI's request for 200 new consecutive DID numbers in the 4600-4999, 6000-6599, 7200-7999 or 8000-8999 ranges. LSI cited new dial plan and growth as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Tullahoma rate center, and, accordingly, AT&T Tennessee was unable to

provide LSI 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 Tullahoma rate center had an MTE of approximately 22.6 months.

11. Despite the fact that AT&T Tennessee's Tullahoma rate center may not exhaust for 22.6 months, AT&T Tennessee is unable to provide the requested service through its switch that serves LSI within the Tullahoma rate center. This is because the individual switch that serves this customer within the Tullahoma rate center does not have sufficient number resources to meet the customer's request.

12. On or about June 6, 2008, 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 LSI is attached as Exhibit "D").

14. Relief for the 931 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 931 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2008-1 NRUF and NPA Exhaust Analysis dated April 2008, the projected exhaust date of the 931 NPA is the Third Quarter 2022. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 931 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 Tullahoma, including the TLLHTNMADSO 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 LSI 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 LSI'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 LSI's needs, the NeuStar is preventing LSI 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 LSI in



order that LSI 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 LSI in the Tullahoma rate center within the 931 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, stylized handwritten signature in black ink, appearing to be "Guy M. Hicks", is written over the printed name and extends to the right across the address block.

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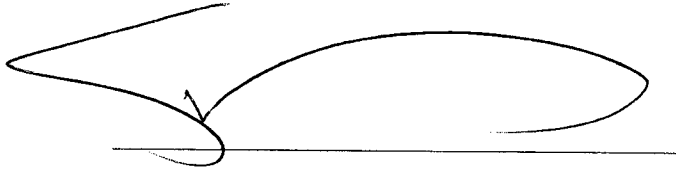
Guy M. Hicks  
Joelle Phillips  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6311

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 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, consisting of a large, stylized loop followed by a horizontal line, positioned above a horizontal line.









## Exhibit A

**Pooling Administration System** **aida.armesto@att.com (SP)****• Sign Out**

Time : 06/06/2008 02:45:38 PM EDT

Printable Version

TBPAG Attachment 1 - March 19, 2007

- +  Individual Block Requests
- +  CO/NXX Code Requests
- +  Confirm Resources In Service
- +  Donate Blocks
- +  Submit Forecast
- +  Search Forms
- +  Reports
- +  User Profile

**Thousands-Block Application Form - Part 1A**

Tracking  
Number: **931-  
TULLAHOMA-TN-  
216205**

**Individual Block  
Request**

Type of  
Application:      **New**                      **Change**                      **Disconnect**

**GENERAL APPLICATION INFORMATION****1.1 Contact Information:**

Block Applicant:

Company Name: **BELLSOUTH SO CNTL**Headquarters  
Address: **2600 Camino Ramon**City, State, Zip: **San Ramon, CA, 94583**Contact Name: **Aida Armesto**Contact  
Address: **600 NW 79 Ave**City, State, Zip: **Miami , FL , 33182**Phone: **305-260-8205**      FAX: **305-264-2918**      E-mail: **aida.armesto@att.com**Pooling Administrator: <sup>ii</sup>Contact Name: **Genevieve Bettiga**Contact  
Address: **1800 Sutter St**City, State, Zip: **Concord ,CA, 94520**Phone: **925-363-7652**      FAX: **925-363-7683**E-mail: **genevieve.bettiga@neustar.biz****1.2 General Information:**Check one : No LRN needed      **X**      LRN needed <sup>iii</sup>NPA: **931**      LATA: **470**      OCN: <sup>iv</sup>  
**9419**      Parent Company's OCN  
**9400**Number of Thousands-Blocks Requested : **1**Switching Identification(Switch Entity/POI) : <sup>v</sup> **TLLHTNMADS0**City or Wire Center Name :      Rate Center: <sup>vi</sup>  
**TULLAHOMA**

Rate Center Sub Zone:

**1.3 Dates:**

Date of Application: vii **06/06/2008** Requested Block Effective Date: viii  
**07/07/2008**

Request Expedited Treatment? (See Section 8.6) Yes No **X**

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

- a) Type of Service Provider : **Incumbent Local Exchange Carrier (ILEC)** (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : **Wireline**
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) **DUE TO DIALING RESTRICTIONS CUST NOW CLAIMS THE ONLY ACCEPTABLE RANGES ARE 4600-4999; 6000-6599; 7200-7999; 8000-8999 - CUST NEEDS 200 DIDS - IF THEY ARE NOT AVAIL PLS ORDER NEW RANGE OF NUMBERS. CUST WOULD LIKE CONSECUTIVE NUMBERS. TKS!**
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any  
**666,800,900X Block 0 (0000-0999) Technical Restriction: PBX restriction X Block 1 (1000-1999) Technical Restriction: PBX restriction X Block 2 (2000-2999) Technical Restriction: dial plan conflict X Block 3 (3000-3999) Technical Restriction: dial plan conflict X Block 4 (4000-4999) Technical Restriction: dial plan conflict X Block 5 (5000-5999) Technical Restriction: dial plan conflict X Block 6 (6000-6599) Technical Restriction: \*none\* X Block 6 (6600-6999) Technical Restriction: dial plan conflict X Block 7 (7000-7199) Technical Restriction: dial plan conflict X Block 7 (7200-7999) Technical Restriction: \*none\* X Block 8 (8000-8999) Technical Restriction: PBX restriction X Block 9 (9000-9999) Technical Restriction: PBX restriction**
- 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)

**1.5 Type of Request:**

Initial block for rate center : Yes If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.  
Growth block for rate center : Yes **X** If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

OCN:Intra-company <sup>ix</sup> Switching Id Part 1B

OCN:Inter-company <sup>x</sup> Effective Date

Change block : Yes If Yes , list NPA-NXX-X

**1.6 Block Return :**

- a) Is this block Contaminated Yes No
- b) If Yes how many TNs are NOT available for assignment :
- c) Have all new Intra SP ports been completed in the NPAC Yes No
- d) Has this block been protected from further assignment Yes No

Disconnect block : Yes If Yes , list NPA-NXX-X

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration

Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

Aida Armesto

**Associate  
Tech  
Support 06/06/2008  
Analyst  
Network**

Signature of Block Applicant

Title Date

**Instructions for filling out each Section of the Part 1A form:**

**Section 1.1** Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

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

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

**Section 1.4** Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

**Section 1.5** Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

**Section 1.6** Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Foot Notes :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.

vi Rate Center name must be a tariffed Rate Center.

vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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## Exhibit B



# Pooling Administration System









 aida.armesto@att.com (SP)

• Sign Out

Time : 06/06/2008 02:45:11 PM EDT

Printable Version

May 16, 2008

- +  Individual Block Requests
- +  CO/NXX Code Requests
- +  Confirm Resources In Service
- +  Donate Blocks
- +  Submit Forecast
- +  Search Forms
- +  Reports
- +  User Profile

## Appendix 3

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **931-TULLAHOMA-TN-216205**Date: **06/06/2008**OCN: **9419**Company Name: **BELLSOUTH SO CNTL**Rate Center: **TULLAHOMA**

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

Name of Block Applicant: **Aida Armesto**Signature: **Aida Armesto**
 Title: **Associate Tech Support Analyst Network**  
 FAX No.: **305-264-2918**
Telephone No.: **305-260-8205**E-mail: **aida.armesto@att.com**A. Available Numbers: **5480**B. Assigned Numbers: **31532**C. Total Numbering Resources: **38624**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: **0**
 List  
 Excluded  
 Code(s) or  
 Block(s):

| Month #1 | Month #2 | Month #3 | Month #4 | Month #5 | Month #6 | Month #7 | Month #8 | Month #9 | Month #10 | Month #11 | Month #12 |
|----------|----------|----------|----------|----------|----------|----------|----------|----------|-----------|-----------|-----------|
|----------|----------|----------|----------|----------|----------|----------|----------|----------|-----------|-----------|-----------|

 E. Growth  
 History -  
 Previous 6  
 months<sup>3</sup>

|    |     |    |    |    |    |
|----|-----|----|----|----|----|
| 59 | 279 | 46 | 64 | -3 | 11 |
|----|-----|----|----|----|----|

 F. Forecast  
 - Next 12  
 months<sup>4</sup>

|    |    |      |    |    |    |    |    |    |    |    |    |
|----|----|------|----|----|----|----|----|----|----|----|----|
| 76 | 76 | 1076 | 76 | 76 | 76 | 76 | 76 | 76 | 76 | 76 | 76 |
|----|----|------|----|----|----|----|----|----|----|----|----|

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **242.667**H. Months  
to

Numbers Available for Assignment to

Exhaust<sup>5</sup>  
=

Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

5480

Months To Exhaust

22.582

I.  
Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers(D) X 100 =  
= 81.638

Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation:

<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.

<sup>2</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>3</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.

<sup>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</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, section 52.15 (g) (3) (iii)).

<sup>6</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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## Exhibit C

## Pooling Administration System

aida.armesto@att.com (SP)

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Attachment 3

- + ☐ Individual Block Requests
- + ☐ CO/NXX Code Requests
- + ☐ Confirm Resources In Service
- + ☐ Donate Blocks
- + ☐ Submit Forecast
- + ☐ Search Forms
- + ☐ Reports
- + ☐ User Profile

November 21, 2003  
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 931-  
TULLAHOMA-TN-  
216205

Date of Application: 06/06/2008 Effective Date: \_\_\_\_\_  
Date of Receipt: 06/06/2008 Date of Response: 06/06/2008

Service Provider Name: BELLSOUTH SO CNTL  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN: 9419

NPAC SOA SPID : \_\_\_\_\_

## Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-  
7652

Signature of Pooling Administrator

Genevieve Bettiga Fax: 925-363-  
7683

Name (print)

Email: genevieve.bettiga@neustar.bizNPA-NXX or NPA-  
NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_

Block Reserved : \_\_\_\_\_

Block Reservation  
Expiration Date : \_\_\_\_\_

Block/Code Modified : \_\_\_\_\_

Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated(Yes or No) : \_\_\_\_\_

If Yes, enter the number of TNs contaminated : \_\_\_\_\_

Switch Identification(Switch Entity/POI): <sup>1</sup> \_\_\_\_\_

Rate Center: \_\_\_\_\_

Rate Center Sub Zone: \_\_\_\_\_

TLLHTNMADS0TULLAHOMA

☒ Form Complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this**

**request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

**Request withdrawn.**

Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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A Company with a *Smart Vision*

May 20, 2008

**LSI Industries Inc.**  
**1108 Oakdale Street**  
**Manchester, TN 37355**

AT&T Number Administration/Code Administration,

This Letter of Intent, is for LSI Industries Inc. to request 200 numbers for Prime PRI DID. The DIDs required must be consecutive in order to accommodate a dial plan which incorporates company extensions, customer toll-free numbers, and multi-site call-centers. LSI Industries Inc. agrees to activate the numbers requested within 180 days from AT&T's receipt of the requested numbers. LSI Industries Inc. intends to order service using these numbers immediately after required testing is performed by AT&T and to activate service on these numbers as soon as possible.

As noted below, we can use any continuous block of 200 numbers in the following ranges:

4600-4999, 6000-6599, 7200-7999, 8000-8999

Please indicate restricted blocks, citing the reason (e.g., PBX limitation, dial plan conflict)

X Block 0 (0000-0999) Technical Restriction: PBX restriction \_\_\_\_\_  
X Block 1 (1000-1999) Technical Restriction: PBX restriction \_\_\_\_\_  
X Block 2 (2000-2999) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 3 (3000-3999) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 4 (4000-4599) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 4 (4600-4999) Technical Restriction: \*none\* \_\_\_\_\_  
X Block 5 (5000-5999) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 6 (6000-6599) Technical Restriction: \*none\* \_\_\_\_\_  
X Block 6 (6600-6999) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 7 (7000-7199) Technical Restriction: dial plan conflict \_\_\_\_\_  
X Block 7 (7200-7999) Technical Restriction: \*none\* \_\_\_\_\_  
X Block 8 (8000-8999) Technical Restriction: PBX restriction \_\_\_\_\_  
X Block 9 (9000-9999) Technical Restriction: PBX restriction \_\_\_\_\_

These numbers are being used as part of an overall corporate communication plan which includes 9 sites spanning the entire United States. In addition, our corporate strategy is to

grow by acquisition, so we anticipate adding multiple additional sites in the future across different states, which will all have to fit into this overall dial plan and communication strategy.

The lack of a contiguous block of DID numbers that integrate with our dial plan will pose a significant hardship on our ability to execute a consistent communication plan throughout the company.

Sincerely,

A handwritten signature in black ink, appearing to read 'SAB', written in a cursive style.

Steven A. Bruner  
Chief Information Officer  
LSI Industries Inc.

**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 1-800-342-8359, 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.

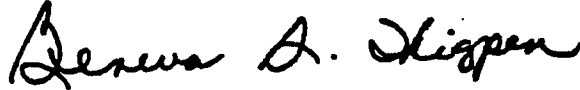
2. That the numbering resources assigned by BellSouth to Guilford County Government and Coming, Inc., shall be done in a sequential numbering manner to optimize these resources.

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

ISSUED BY ORDER OF THE COMMISSION.

This the 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

## Tullahoma Exchange

| NPA-NXX        | X | Available Numbers | Assigned Numbers | Total Number Resources | Utilization |
|----------------|---|-------------------|------------------|------------------------|-------------|
| 931-393        | 0 | 208               | 736              | 980                    | 75.102%     |
| 931-393        | 1 | 10                | 977              | 995                    | 98.191%     |
| 931-393        | 2 | 401               | 466              | 933                    | 49.946%     |
| 931-393        | 3 | 326               | 516              | 926                    | 55.724%     |
| 931-393        | 4 | 366               | 519              | 938                    | 55.330%     |
| 931-393        | 5 | 194               | 749              | 977                    | 76.663%     |
| 931-393        | 6 | 17                | 966              | 996                    | 96.988%     |
| 931-393        | 7 | 4                 | 995              | 1,000                  | 99.500%     |
| 931-393        | 8 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-393        | 9 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-454        | 0 | 202               | 709              | 944                    | 75.106%     |
| 931-454        | 1 | 36                | 929              | 982                    | 94.603%     |
| 931-454        | 2 | 253               | 666              | 951                    | 70.032%     |
| 931-454        | 3 | 0                 | 999              | 1,000                  | 99.900%     |
| 931-454        | 4 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-454        | 5 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-454        | 6 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-454        | 7 | 1                 | 999              | 1,000                  | 99.900%     |
| 931-454        | 8 | 1                 | 999              | 1,000                  | 99.900%     |
| 931-454        | 9 | 352               | 539              | 944                    | 57.097%     |
| 931-455        | 0 | 46                | 745              | 936                    | 79.594%     |
| 931-455        | 1 | 92                | 759              | 928                    | 81.789%     |
| 931-455        | 2 | 255               | 617              | 922                    | 66.920%     |
| 931-455        | 3 | 53                | 770              | 906                    | 84.989%     |
| 931-455        | 4 | 282               | 624              | 932                    | 66.953%     |
| 931-455        | 5 | 97                | 749              | 932                    | 80.365%     |
| 931-455        | 6 | 285               | 587              | 927                    | 63.323%     |
| 931-455        | 7 | 246               | 615              | 917                    | 67.067%     |
| 931-455        | 8 | 255               | 639              | 934                    | 68.415%     |
| 931-455        | 9 | 275               | 609              | 936                    | 65.064%     |
| 931-461        | 0 | 44                | 878              | 973                    | 90.236%     |
| 931-461        | 1 | 28                | 927              | 982                    | 94.399%     |
| 931-461        | 2 | 18                | 859              | 990                    | 86.768%     |
| 931-461        | 3 | 103               | 870              | 989                    | 87.968%     |
| 931-461        | 4 | 50                | 824              | 992                    | 83.065%     |
| 931-461        | 5 | 392               | 512              | 943                    | 54.295%     |
| 931-461        | 6 | 0                 | 1,000            | 1,000                  | 100.000%    |
| 931-461        | 7 | 63                | 841              | 976                    | 86.168%     |
| 931-461        | 8 | 116               | 858              | 992                    | 86.492%     |
| 931-461        | 9 | 409               | 485              | 951                    | 50.999%     |
| <b>TOTALS:</b> |   | 5,480             | 31,532           | 38,624                 | 81.638%     |