

AT&T Tennessee 333 Commerce Street Suite 2101 Nashville, TN 37201-3300 T: 615.214.6311 F: 615.214.7406 joelle.phillips@att.com

July 7, 2008

VIA HAND DELIVERY

Hon. Eddie Roberson, 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 St. Mary's Health System

Docket No 08-00116

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.

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 St. Mary's Health System
	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 July 3, 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 a new code of 10,000 numbers necessary to meet the demands of its customer, St. Mary's Health System ("St. Mary's"). 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 St. Mary's's request for a new NXX code (10,000 numbers). St. Mary's cited phone system consolidation 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 St. Mary's 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 7 months.
- 11. Despite the fact that AT&T Tennessee's Knoxville rate center may not exhaust for 7 months, AT&T Tennessee is unable to provide the requested service through its switch that serves St. Mary's 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 July 3, 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 St. Mary's 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 March 21, 2002. According to NeuStar, based on the 2008-1 NRUF and NPA Exhaust Analysis dated April 2008, the projected exhaust date of the 865 NPA is the Third Quarter 2026. 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 St. Mary's 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.

- Under earlier months-to-exhaust procedures used by NeuStar, waivers 19. 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 St. Mary's'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 St. Mary's's needs, the NeuStar is preventing St. Mary's 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 St. Mary's in order that St. Mary's 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 St. Mary's in the Knoxville rate center within the 865 NPA.

Respectfully submitted,

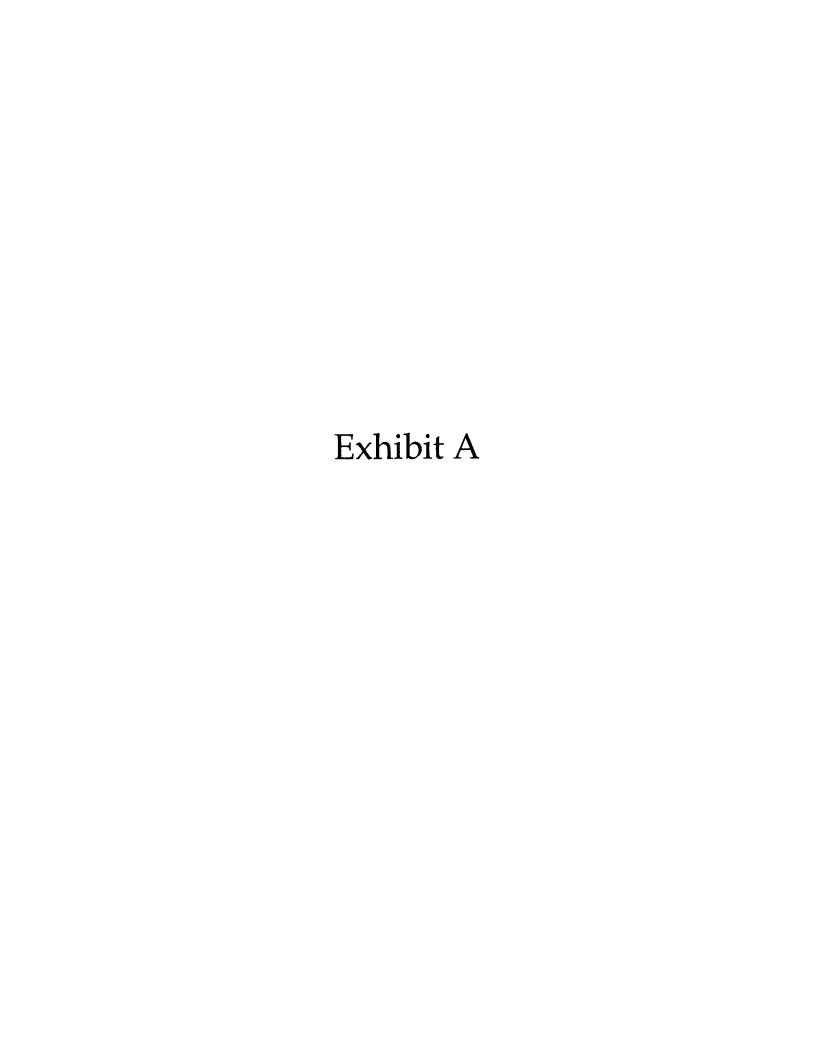
AT&T_TENNESSEE

Guy M. Hicks

Joelle Phillips

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

(615) 214-6311



Pooling Administration System aida.armesto@att.com (SP) Sign Out Time: 07/03/2008 08:41:18 AM EDT Printable Version Central Office Code (NXX) Assignment Request Part 1 December 9, 2005 Tracking 865-KNOXVILLE-TN-220335 Number: **Full NXX: Dedicated** Customer Type of Change 1 Delete New Application: 1.0 GENERAL INFORMATION 1.1 Contact Information: Code Applicant: Company/Entity BELLSOUTH SO CNTL Name: Headquarters 2600 Camino Ramon Address: City, State, Zip: San Ramon, CA, 94583 Contact Name: Aida Armesto Contact 600 NW 79 Ave Address: City,State,Zip: Miami, FL, 33182 E-305-260-8205 FAX: 305-264-2918 Phone: mail: aida.armesto@att.com Code Administrator: 2 Michael Ortega Name: 46000 Center Oak Plaza Address: City,State,Zip: Sterling ,VA ,20166 FAX:571-434-5502 Phone: 571-434-5348 **1.2** NPA: **865** NXX: ³ OCN: 4 9419 LATA: 474 Parent Company's OCN(s) 9400 Switching Identification(Switch Entity/POI) 5 KNVLTNMADS1 Rate Center: 6 Locality/City/Wire Center: KNOXVILLE Homing Tandem Operating Co: 7 Tandem Homing CLLI 8:KNVLTNMA84T **BST** Request Effective Date: 9 10 1.3 Dates: Date of 09/14/2008 Application: 07/03/2008 X Request Expedited Treatment? Yes Νo **Incumbent Local** Type of company/entity requesting the code: Exchange Carrier (ILEC) (LEC, IC, CMRS, Other) b) Types of service: (e.g., Cellular - Type 2) Wireline Customer will take any NXX c) Code Assignment Preference (Optional) available

d) Codes that are undesirable, if any 666,800,900

e) Type of change(Mark all that apply)

Tandem OCN-Intra-company 11 Rate Center Switching Id Homing CLLI

Extend OCN-Inter-company 12 LATA Effective Date Reservation

Growth 1.5 Type of Request (Initial, growth, etc.)

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: 13

No Yes 1.6 NPA Jeopardy Criteria Apply:

1.7 Code request for new service (Explain):

for BIRRDS 14 15 X Part 2 is not attached 1.8 Part 2 is attached Additional Documentation is not attached Additional Documentation is attached

Comments:

"NON POOLED CODE FOR DEDICATED CUSTOMER" ST MARY'S HEALTH SYSTEM

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (http://www.atis.org/atis/clc/inc/incdocs.htm) as of the date of this application: 16

Associate Tech 07/03/2008 Support Aida Armesto Analyst Network Date Title Signature of Code Applicant

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

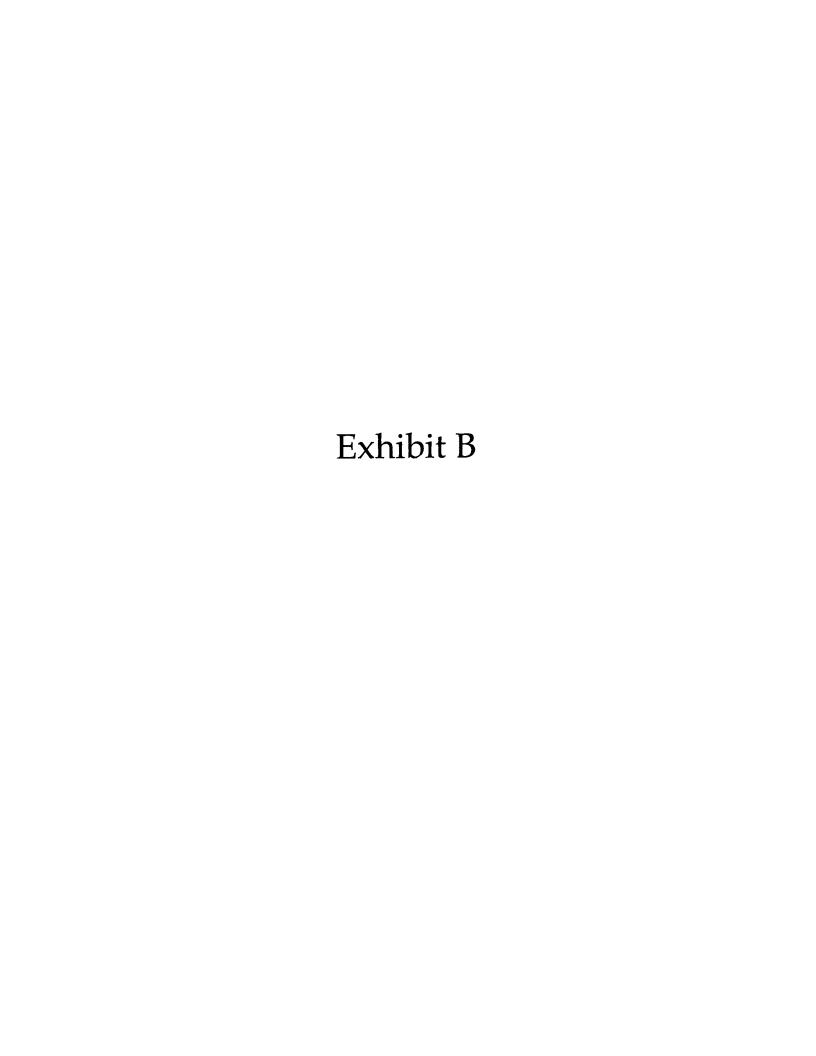
⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia $^{\mathsf{TM}}$

Routing Administration (TRA) on 732-699-6700.

- ⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
- 10 Requests for code assignment should not be made more than six months prior to the requested effective date.
- ¹¹ Select if you are the current Code Holder
- 12 Select if you are not the current Code Holder
- ¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- ¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia TM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.
- ¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.
- ¹⁶ An incomplete form may result in delays in processing this request.

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Pooling Administration System **Pooling Administration System** Sign Out aida.armesto@att.com (SP) Time: 07/03/2008 08:40:22 AM EDT Printable Version May 16, 2008 Appendix 3 MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level 1 (Thousands-Block Number Pooling Growth Block Request) Tracking Number: 865-KNOXVILLE-TN-220335 Company Name: BELLSOUTH SO CNTL Date: 07/03/2008 OCN:9419 Rate Center: KNOXVILLE List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): Signature: Aida Armesto Name of Block Applicant: Aida Armesto Telephone No.: 305-260-8205 Title: Associate Tech Support Analyst Network FAX No.: 305-264-2918 E-mail: aida.armesto@att.com A. Available Numbers: 153211 B. Assigned Numbers: 374958 C. Total Numbering Resources:549578 D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation 2:0 List Excluded Code(s) or Block(s): Month #12 #11 #8 #9 #10 #6 #7 #1 #2 #3 #5 E. Growth History -3536 4289 Previous 6

4575 4751 2573 4078

months³

F. Forecast

3967 3967 - Next 12 3967 103967 3967 3967 3967 3967 3967 3967 months4

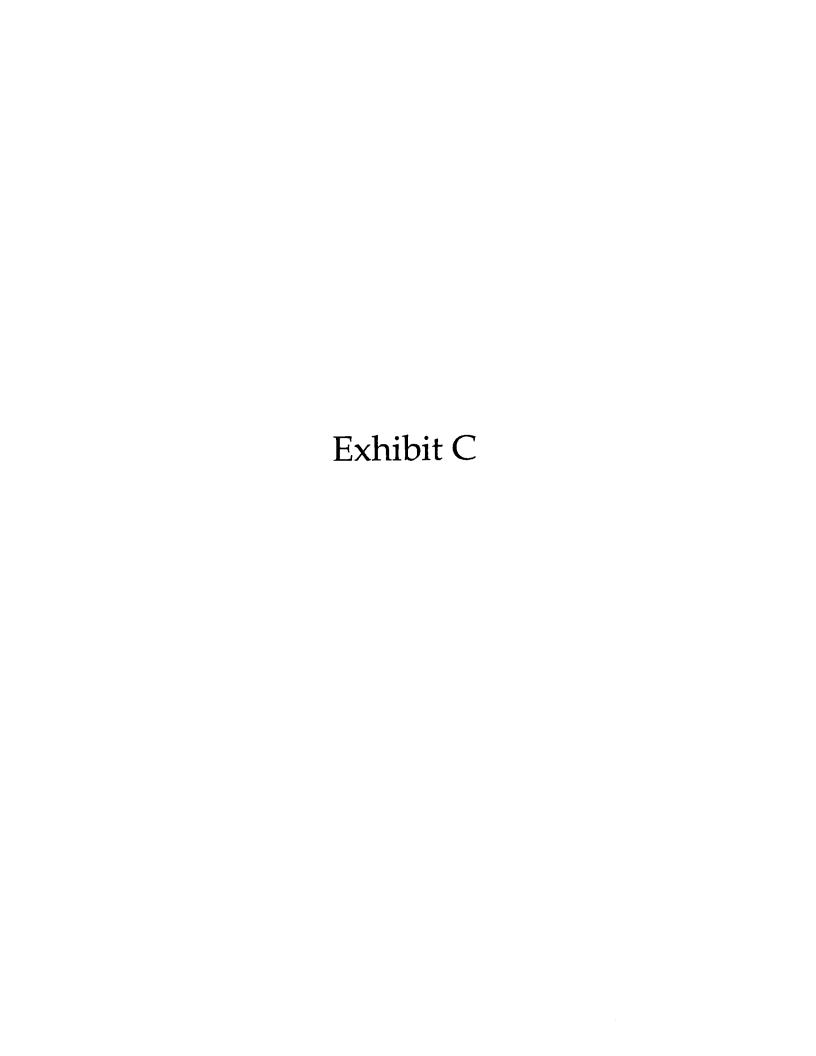
G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):20633.667

H. Months

Numbers Available for Assignment to

Customers(A) Exhaust⁵ Average Monthly Forecast(G) Months To Exhaust **Block Requested** Available Numbers 7.425 153211 X 100 =Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) Total Numbering Resources(C)-Excluded Numbers(D) 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. ²Quantity 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). ³Net 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. ⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1. ⁵To 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)). ⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii)Back

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	3/2008 08:39:45 AM ED	Т	<u>.</u>
			Prin Attachment
November 21, 2003 ATIS-0300066.at3			Adachment
	ıa Administrator's R	lesponse/Confirmation	1
	TEPAGI	Part 3	
	865-KNOXVILL	E-	
Tracking Number :	TN-220335		
Date of Application:	07/03/2008	Effective Date:	
Date of Receipt:	07/03/2008	Date of Response:	07/03/2008
Service Provider Name	BELLSOUTH S	O CNTL	
(Telcordia TM LERG TM	9419		
Routing Guide) OCN:			
NPAC SOA SPID :			
Pooling Administrator	r Contact Information:		
Genevieve Bettiga	Phone:		925-363- 7652
Signature of Pooling Ac	dministrator		
Genevieve Bettiga	Fax:		925-363- 7 <u>6</u> 83
Name (print)			
Email:	genevi	eve.bettiga@neustar.l	<u>oiz</u>
NPA-NXX or NPA NXX-X :		Block Assigned:	
		Block Reserved:	
		Block Reservation Expiration Date:	n
		Block/Code Modi	fied:
		Block/Code Disconnected :	
	ted(Yes or No) :		
Block Contaminat			
	umber of TNs contamina	ated :	
If Yes,enter the n	umber of TNs contamination(Switch Entity/POI): ¹	ated : KNVLTNMAD	S1
If Yes,enter the n			S1
If Yes,enter the n Switch Identification	on(Switch Entity/POI): 1	KNVLTNMAD	S1
If Yes,enter the n Switch Identification Rate Center:	on(Switch Entity/POI): ¹ Zone:	KNVLTNMAD	S1
If Yes,enter the n Switch Identification Rate Center: Rate Center Sub	on(Switch Entity/POI): ¹ Zone:	KNVLTNMAD	S1
If Yes,enter the n Switch Identification Rate Center: Rate Center Sub 2 X Form Complete, Explanation:	on(Switch Entity/POI): 1 Zone: request denied.	KNVLTNMAD	rements,

Request withdrawn.
Explanation:
Assignment activity suspended by the administrator.
Explanation:
¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM 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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Petition of AT&T Tennessee St. Mary's Health System Exhibit D

St. Mary's Medical Center 900 E. Oak Hill Avenue Knoxville, TN 37917 865,545,8000

St. Mary's Jefferson Memorial Hospital 110 Hospital Drive Jefferson City, TN 37760 865 471,2500

St. Mary's Medical Center of Campboll County 919 E. Central Avenue LaFollette, TN 37766 423,907,1200

Jefferson Memorial Foundation 110 Hospital Drive Jefferson City, TN 37760 865,471,2500

St. Mary's Ambulatory Surgery Center 1515 St. Mary's Street Knoxville, TN 37917 865,546,5075

St. Mary's Foundation 900 E. Oak Hill Avenue Knoxville, TN 37917 865-545-7690

St. Mary's Health & Funess Center 7540 Dannaher Lanc Knoxyille, TN 37849 865,938,5015

St. Mary's Holston Health & Rehab 3916 Boyds Bridge Pike Knoxville, TN 37914 865.524.1500

St Mary's HomeCare Services 5411 Fountain Road, Suite 200 Knoxville, TN 37918 865.545.3500

St. Mary's Residential Hospice 7447 Andersonville Pike Knoxville, TN 37938 865-925-5500

www.stmaryshealth.com

June 10, 2008

Alan L. Hill
AT&T Business
410 N. Cedar Bluff Road
Suite 300
Knoxville, TN 37923

Dear Alan:

Thank you for your recent proposals and designs for the newly formed Mercy Health group and working with us on our AT&T services. In light of our recent discussions about the merger of St. Mary's Health Systems and Baptist Health Systems under the umbrella of Mercy Health Partners, we are also merging our current phone systems and dialing plans. In order to provide our healthcare organization with an overall structural improvement and seamless appearance to our patients, we need to provide uniformity within our offices, patient rooms, and services. Both I and the CEO of Mercy Health Partners - Metro, Jeff Ashin, are behind this project.

In order to proceed with our improvements, we would like to request a new range of 10,000 consecutive DID-PRI Numbers. We would like to have the numbers available by the end of October, 2008. It is our understanding that this is not available right now and we would require an entire new 865-NXX to be opened for just our facilities, but that a request of this nature would be reviewed. Please forward this request to the appropriate person(s), so that ample time and thought can be given to our request. We will work with you to also return the majority of our numbers to AT&T's numbering plan database over a phased implementation as we realize the tight supply of numbers that exists today. The current inventory of NXXs we have in the 865 NPA today are: St. Mary's - 545 [4,200], Baptist - 549 & 632 [3,000] for about a total of 7,200 DID numbers in both systems.

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 fruition.

解放ける時間 後に対象性の とこのは、1975年を持ち、大変ない。 これでは、これでは、これには、1975年(1977)

ANK

Scott Burke

Divisional CIO/VP Information Systems

Mercy Health Partners Knoxville, TN 37917

865-545-7169

spburke@mercy.com

TENNESSEE REGULATORY AUTHORITY



460 James Robertson Perkway Nachville, Tenassee 37243-0505

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

November 29, 2001

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

RE: Denial of BellSouth's Central Office Code ("NXK") 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. 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. KONDER

K. David Waddell **Executive Secretary**

CC: Brent Struthers, NewStar

Telephone (615) 741-2904, Toll-Pres 1-800-342-8359, Faceimile (615) 741-8953

www.stata.ts.wew

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 Coming, 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.
- 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

Derwa A. Wiggen

Geneva S. Thigpen, Chief Clerk

(D40001.02

	-			Total	
NPA-		Available	Assigned	Number	
NXX	х	Numbers	Numbers		Utilization
865-212	0	71	884	966	91.511%
865-212	1	0	1,000	1,000	100.000%
865-212	2	54	936	993	94.260%
865-212	3	397	346	809	42.769%
865-212	4	345	524	916	57.205%
865-212	5	68	887	962	92.204%
865-212	6	7	604	613	98.532%
865-212	7	0	386	386	100.000%
865-212	8	0	1,000	1,000	100.000%
865-212	9	137	803	962	83.472%
865-215	0	0	1,000	1,000	100.000%
865-215	1	5	895	900	99.444%
865-215	2	0	1,000	1,000	100.000%
865-215	3	0	1,000	1,000	100.000%
865-215	4	0	1,000	1,000	100.000%
865-215	5	0	1,000	1,000	100.000%
865-215	6	100	900	1,000	90.000%
865-215	7	0	1,000	1,000	100.000%
865-215	8	0	1,000	1,000	100.000%
865-215	9	10	964	987	97.670%
865-219	0	665	235	920	25.543%
865-219	1	60	940	1,000	94.000%
865-219	2	100	900	1,000	90.000%
865-219	3	o	1,000	1,000	100.000%
865-219	4	21	977	1,000	97.700%
865-219	5	108	887	996	89.056%
865-219	6	228	712	973	73.176%
865-219	7	361	410	905	45.304%
865-219	8	681	223	919	24.266%
865-219	9	658	223	901	24.750%
865-226	Ö	20	980	1,000	98.000%
865-226	1	0	1,000	1,000	100.000%
865-226	2	0	1,000	1,000	100.000%
865-226	3	0	1,000	1,000	100.000%
865-226	4	0	1,000	1,000	100.000%
865-226	5	1	999	1,000	99.900%
865-226	6	1,000	0	1,000	0.000%
865-226	7	0	1,000	1,000	100.000%
865-226	8	1	999	1,000	99.900%
865-281	0	401	380	843	45.077%
865-281	1	0	1,000	1,000	100.000%
865-281	2	368	478	883	54.134%

]			Total		
NPA-		Available	Assigned			
NXX	l x	Numbers	Numbers	Resources	Utilization	
865-281	3	0	1,000	1,000	100.000%	
865-281	4	382	523	908	57.599%	
865-281	5	288	702	993	70.695%	
865-281	6	334	642	989	64.914%	
865-281	7	687	227	927	24.488%	
865-281	8	423	387	860	45.000%	
865-281	9	605	276	894	30.872%	
865-305	0	1,000	0	1,000	0.000%	
865-305	1	1,000	0	1,000	0.000%	
865-305	2	1,000	0	1,000	0.000%	
865-305	3	1,000	0	1,000	0.000%	
865-305	4	1,000	0	1,000	0.000%	
865-305	5	1,000	0	1,000	0.000%	
865-305	6	1,000	0	1,000	0.000%	
865-305	7	1,000	0	1,000	0.000%	
865-305	8	1,000	0	1,000	0.000%	
865-305	9		0		0.000%	
865-329		1,000	319	1,000 965	33.057%	
865-329	0	596				
	1	51	935	993	94.159%	
865-329	2	49	583	971	60.041%	
865-329	3	388	428	847	50.531%	
865-329	4	498	488	994	49.095%	
865-329	5	103	710	818	86.797%	
865-329	8	200	747	972	76.852%	
865-329	9	328	566	963	58.775%	
865-330	0	104	512	646	79.257%	
865-330	1	79	801	880	91.023%	
865-330	2	239	696	962	72.349%	
865-330	3	123	865	989	87.462%	
865-330	4	0	1,000	1,000	100.000%	
865-330	5	0	1,000	1,000	100.000%	
865-330	6	12	884	898	98.441%	
865-330	7	380	493	876	56.279%	
865-330	8	574	406	980	41.429%	
865-330	9	769	148	949	15.595%	
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	0	1,000	1,000	100.000%	
865-373	6	0	1,000	1,000	100.000%	

NPA-	v	Available	Assigned Numbers	Total Number Resources	Utilization
NXX	Х	Numbers			
865-373	7	0	1,000	1,000	100.000%
865-373	8	0	1,000	1,000	100.000%
865-373	9	0	1,000	1,000	100.000%
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%
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	141	92	500	18.400%
865-403	3	0	1,000	1,000	100.000%
865-403	4	0	1,000	1,000	100.000%
865-403	5	0	1,000	1,000	100.000%
865-403	6	0	1,000	1,000	100.000%
865-403	7	0	1,000	1,000	100.000%
865-403	8	0	1,000	1,000	100.000%
865-437	0	0	1,000	1,000	100.000%
865-437	1	0	1,000	1,000	100.000%
865-437	2	0	1,000	1,000	100.000%
865-437	3	0	1,000	1,000	100.000%
865-437	4	ol	1,000	1,000	100.000%
865-450	0	ol	1,000	1,000	100.000%
865-450	1	115	819	937	87.407%
865-450	2	167	727	905	80.331%
865-450	3	99	878	981	89.501%
865-450	4	61	937	999	93.794%
865-450	5	273	671	976	68.750%
865-450	6	0	1,000	1,000	100.000%
865-450	7	0	1,000	1,000	100.000%
865-450	8	89	880	977	90.072%
865-450	9	280	545	905	60.221%
865-470	0	38	613	897	68.339%
865-470	1	333	667	1,000	66.700%
865-470	2	318	479	850	56.353%
865-470	3	327	340	903	37.652%
865-470			513	642	79.907%
865-470	5	31 22	973		97.593%

			Total		
NPA-		Available	Assigned		
NXX	X	Numbers	Numbers		Utilization
865-470	6	0	1,000	1,000	100.000%
865-470	7	70	745	873	85.338%
865-470	8	444	357	838	42.601%
865-470	9	394	389	826	47.094%
865-474	2	0	1,000	1,000	100.000%
865-474	3	0	1,000	1,000	100.000%
865-474	4	1,000	0	1,000	0.000%
865-474	5	1,000	0	1,000	0.000%
865-521	0	89	625	859	72.759%
865-521	1	244	706	959	73.618%
865-521	2	38	879	931	94.415%
865-521	3	566	335	956	35.042%
865-521	4	664	286	978	29.243%
865-521	5	41	674	834	80.815%
865-521	6	409	426	885	48.136%
865-521	7	407	456	904	50.442%
865-521	8	29	673	937	71.825%
865-521	9	521	360	908	39.648%
865-522	0	378	453	909	49.835%
865-522	1	495	401	922	43.492%
865-522	2	376	473	894	52.908%
865-522	3	130	666	865	76.994%
865-522	4	449	428	925	46.270%
865-522	5	430	443	912	48.575%
865-522	6	372	465	875	53.143%
865-522	7	490	399	918	43.464%
865-522	8	446	436	918	47.495%
865-522	9	482	367	906	40.508%
865-523	0	459	383	894	42.841%
865-523	1	399	427	883	48.358%
865-523	2	462	386	889	43.420%
865-523	3	531	340	904	37.611%
865-523	4	438	450	919	48.966%
865-523	5	433	431	919	46.899%
865-523	6	439	425	905	46.961%
865-523	7	479	410	917	44.711%
865-523	8	463	398	907	43.881%
865-523	9	382	451	875	51.543%
865-524	0	388	444	881	50.397%
865-524	1	498	355	894	39.709%
865-524	2	431	388	881	44.041%
865-524	3	389	412	839	49.106%

NPA-		Available	Assigned	Total Number	
NXX	X	Numbers	Numbers		Utilization
865-524	4	413	433	882	49.093%
865-524	5	364	471	869	54.200%
865-524	6	146	736	950	77.474%
865-524	7	470	387	908	42.621%
865-524	8	575	328	934	35.118%
865-524	9	593	291	910	31.978%
865-525	0	138	595	865	68.786%
865-525	1	385	463	888	52.140%
865-525	2	371	448	856	52.336%
865-525	3	411	419	871	48.106%
865-525	4	376	478	908	52.643%
865-525	5	409	470	911	51.592%
865-525	6	438	414	890	46.517%
865-525	7	381	495	918	53.922%
865-525	8	398	452	895	50.503%
865-525	9	358	461	888	51.914%
865-531	0	337	420	801	52.434%
865-531	1	136	580	794	73.048%
865-531	2	359	391	785	49.809%
865-531	3	360	387	796	48.618%
865-531	4	352	449	853	52.638%
865-531	5	639	273	941	29.012%
865-531	6	16	815	878	92.825%
865-531	7	116	572	783	73.052%
865-531	8	317	431	803	53.674%
865-531	9	45	577	697	82.783%
865-539	0	324	429	801	53.558%
865-539	1	328	424	799	53.066%
865-539	2	349	388	837	46.356%
865-539	3	152	523	727	71.939%
865-539	4	382	355	795	44.654%
865-539	5	379	479	911	52.580%
865-539	6	326	434	827	52.479%
865-539	7	10	282	295	95.593%
865-539	8	34	774	923	83.857%
865-539	9	323	417	787	52.986%
865-540	0	5	987	999	98.799%
865-540	1	144	646	822	78.589%
865-540	2	300	700	1,000	70.000%
865-540	3	29	933	983	94.914%
865-540	4	38	857	943	90.880%
865-540	5	306	472		52.503%

NPA-		Available	Assigned	Number	
NXX	x	Numbers	Numbers	Resources	Utilization
865-540	6	9	985	994	99.095%
865-540	7	277	242	520	46.538%
865-540	8	440	430	930	46.237%
865-540	9	11	972	991	98.083%
865-541	0	0	999	1,000	99.900%
865-541	1	0	1,000	1,000	100.000%
865-541	2	0	1,000	1,000	100.000%
865-541	3	0	1,000	1,000	100.000%
865-541	4	157	835	998	83.667%
865-541	5	55	537	605	88.760%
865-541	6	198	702	914	76.805%
865-541	7	0	1,000	1,000	100.000%
865-541	8	0	1,000	1,000	100.000%
865-541	9	0	1,000	1,000	100.000%
865-544	0	420	386	889	43.420%
865-544	1	181	586	875	66.971%
865-544	2	20	732	976	75.000%
865-544	3	299	658	982	67.006%
865-544	4	165	506	738	68.564%
865-544	5	128	507	681	74.449%
865-544	6	0	997	997	100.000%
865-544	7	521	328	888	36.937%
865-544	8	0	999	999	100.000%
865-544	9	31	941	989	95.147%
865-545	0	0	1,000	1,000	100.000%
865-545	1	0	1,000	1,000	100.000%
865-545	2	0	1,000	1,000	100.000%
865-545	3	0	1,000	1,000	100.000%
865-545	4	395	532	976	54.508%
865-545	5	432	167	600	27.833%
865-545	6	0	1,000	1,000	100.000%
865-545	7	0	1,000	1,000	100.000%
865-545	8	0	1,000	1,000	100.000%
865-545	9	0	1,000	1,000	100.000%
865-546	0	185	562	810	69.383%
865-546	1	437	406	884	45.928%
865-546	2	403	412	869	47.411%
865-546	3	471	368	892	41.256%
865-546	4	405	417	861	48.432%
865-546	5	430	388	855	45.380%
865-546	6	462	374	881	42.452%
865-546	7	372	399	820	48.659%

				Total	
NPA-		Available	Assigned	Number	
NXX	x	Numbers	Numbers	Resources	Utilization
865-546	8	466	366	881	41.544%
865-546	9	420	388	850	45.647%
865-549	0	0	1,000	1,000	100.000%
865-549	1	51	845	999	84.585%
865-549	2	0	995	1,000	99.500%
865-549	3	0	1,000	1,000	100.000%
865-549	4	0	999	999	100.000%
865-549	5	275	666	973	68.448%
865-549	6	100	900	1,000	90.000%
865-549	7	307	549	919	59.739%
865-549	8	0	1,000	1,000	100.000%
865-549	9	0	1,000	1,000	100.000%
865-558	0	412	457	901	50.721%
865-558	1	157	773	944	81.886%
865-558	2	0	1,000	1,000	100.000%
865-558	3	197	593	814	72.850%
865-558	4	158	176	536	32.836%
865-558	5	249	665	946	70.296%
865-558	6	303	451	824	54.733%
865-558	7	989	5	997	0.502%
865-558	8	342	436	831	52.467%
865-558	9	472	339	846	40.071%
865-560	0	291	483	810	59.630%
865-560	1	31	864	952	90.756%
865-560	2	59	563	749	75.167%
865-560	3	57	783	860	91.047%
865-560	4	6	994	1,000	99.400%
865-560	5	312	560	908	61.674%
865-560	7	17	963	1,000	96.300%
865-560	8	16	916	961	95.317%
865-560	9	555	262	845	31.006%
865-564	0	0	1,000	1,000	100.000%
865-564	1	0	1,000	1,000	100.000%
865-564	2	0	1,000	1,000	100.000%
865-564	3	0	1,000	1,000	100.000%
865-564	4	0	1,000	1,000	100.000%
865-564	5	0	1,000	1,000	100.000%
865-564	6	0	1,000	1,000	100.000%
865-564	7	0	1,000	1,000	100.000%
865-564	8	0	1,000	1,000	100.000%
865-564	9	0	1,000	1,000	100.000%
865-573	0	74	650	842	77.197%

NPA-		Available	Assigned	Total Number	
NXX	X	Numbers	Numbers	Resources	Utilization
865-573	1	106	704	892	78.924%
865-573	2	129	638	861	74.100%
865-573	3	127	667	870	76.667%
865-573	4	78	739	893	82.755%
865-573	5	282	566	897	63.099%
865-573	6	102	724	901	80.355%
865-573	7	91	689	881	78.207%
865-573	8	121	674	891	75.645%
865-573	9	98	664	871	76.234%
865-577	0	70	695	868	80.069%
865-577	1	95	671	903	74.308%
865-577	2	310	527	897	58.751%
865-577	3	92	684	870	78.621%
865-577	4	97	698	896	77.902%
865-577	5	113	680	886	76.749%
865-577	6	100	687	874	78.604%
865-577	7	77	731	883	82.786%
865-577	8	104	697	887	78.579%
865-577	9	318	526	896	58.705%
865-579	0	363	469	889	52.756%
865-579	1	135	663	884	75.000%
865-579	2	153	700	916	76.419%
865-579	3	309	513	892	57.511%
865-579	4	395	411	874	47.025%
865-579	5	350	473	862	54.872%
865-579	6	384	458	886	51.693%
865-579	7	80	743	868	85.599%
865-579	8	30	898	939	95.634%
865-579	9	559	328	913	35.926%
865-582	0	0	100	100	100.000%
865-582	2	2	995	999	99.600%
865-582	3	318	656	999	65.666%
865-582	4	70	930	1,000	93.000%
865-583	0	501	361	893	40.426%
865-583	1	174	753	929	81.055%
865-583	2	23	957	980	97.653%
865-583	3	657	191	860	22.209%
865-583	4	330	666	997	66.800%
865-583	5	0	1,000	1,000	100.000%
865-583	6	0	1,000	1,000	100.000%
865-583	7	394	482	978	49.284%
865-583	8	126	727	950	76.526%

NPA-		Available	Assigned	Total Number	
NXX	X	Numbers	Numbers	Resources	Utilization
865-584	0	284	440	789	55.767%
865-584	1	293	468	829	56.454%
865-584	2	390	376	821	45.798%
865-584	3	361	381	788	48.350%
865-584	4	343	402	794	50.630%
865-584	5	367	414	839	49.344%
865-584	6	413	385	859	44.820%
865-584	7	355	457	868	52.650%
865-584	8	372	382	815	46.871%
865-584	9	407	369	833	44.298%
865-588	0	284	470	801	58.677%
865-588	1	285	487	814	59.828%
865-588	2	372	388	801	48.439%
865-588	3	353	459	844	54.384%
865-588	4	153	690	877	78.677%
865-588	5	275	509	830	61.325%
865-588	6	304	498	843	59.075%
865-588	7	324	456	829	55.006%
865-588	8	274	507	814	62.285%
865-588	9	370	443	862	51.392%
865-594	0	611	281	1,000	28.100%
865-594	1	260	726	1,000	72.600%
865-594	2	410	584	1,000	58.400%
865-594	3	107	882	1,000	88.200%
865-594	4	129	810	1,000	81.000%
865-594	5	298	660	983	67.141%
865-594	6	467	508	1,000	50.800%
865-594	7	96	895	992	90.222%
865-594	8	403	586	997	58.776%
865-594	9	434	489	1,000	48.900%
865-595	0	216	672	989	67.947%
865-595	1	108	832	948	87.764%
865-595	2	522	218	740	29.459%
865-595	3	141	704	853	82.532%
865-595	4	129	799	973	82.117%
865-595	5	0	1,000	1,000	100.000%
865-602	0	ol	1,000	1,000	100.000%
865-602	1	0	1,000	1,000	100.000%
865-602	2	353	437	916	47.707%
865-602	3	158	821	983	83.520%
865-602	4	535	425	960	44.271%
865-602	5	380	620	1,000	62.000%

				Total	
NPA-		Available	Assigned	Number	
NXX	Х	Numbers	Numbers	Resources	Utilization
865-602	6	616	379	997	38.014%
865-602	7	115	816	951	85.804%
865-602	8	0	1,000	1,000	100.000%
865-602	9	0	1,000	1,000	100.000%
865-609	0	610	289	916	31.550%
865-609	1	678	235	926	25.378%
865-609	2	711	223	953	23.400%
865-609	3	94	735	851	86.369%
865-609	4	353	105	487	21.561%
865-609	5	283	715	998	71.643%
865-609	6	349	552	964	57.261%
865-609	7	696	252	964	26.141%
865-609	8	706	219	945	23.175%
865-609	9	521	334	898	37.194%
865-631	0	0	1,000	1,000	100.000%
865-631	1	0	1,000	1,000	100.000%
865-631	2	0	1,000	1,000	100.000%
865-631	3	0	1,000	1,000	100.000%
865-631	4	0	1,000	1,000	100.000%
865-631	5	0	1,000	1,000	100.000%
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	ol ol	1,000	1,000	100.000%
865-633	0	399	601	1,000	60.100%
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	45	912	986	92.495%
865-633	5	484	440	960	45.833%
865-633	6	95	756	892	84.753%
865-633	7	81	817	1,000	81.700%

				Total	
NPA-		Available	Assigned		
NXX	X	Numbers	Numbers		Utilization
865-633	8	622	275	931	29.538%
865-633	9	362	569	950	59.895%
865-637	0	466	394	892	44.170%
865-637	1	447	389	884	44.005%
865-637	2	405	388	857	45.274%
865-637	3	542	333	907	36.714%
865-637	4	412	409	859	47.614%
865-637	5	525	325	902	36.031%
865-637	6	450	382	893	42.777%
865-637	7	455	384	875	43.886%
865-637	8	442	403	882	45.692%
865-637	9	455	354	856	41.355%
865-656	0	997	3	1,000	0.300%
865-656	1	993	5	1,000	0.500%
865-656	2	994	4	999	0.400%
865-656	3	994	5	1,000	0.500%
865-656	4	993	7	1,000	0.700%
865-656	5	996	4	1,000	0.400%
865-656	6	997	3	1,000	0.300%
865-656	7	992	8	1,000	0.800%
865-656	8	993	7	1,000	0.700%
865-656	9	989	10	1,000	1.000%
865-670	0	438	332	816	40.686%
865-670	1	398	371	822	45.134%
865-670	2	129	720	954	75.472%
865-670	3	27	698	770	90.649%
865-670	4	14	278	899	30.923%
865-670	5	0	1,000	1,000	100.000%
865-670	6	17	816	846	96.454%
865-670	7	24	870	942	92.357%
865-670	8	30	773	892	86.659%
865-670	9	444	337	814	41.400%
865-673	0	438	382	871	43.858%
865-673	1	0	1,000	1,000	100.000%
865-673	2	20	923	962	95.946%
865-673	3	162	687	883	77.803%
865-673	4	184	679	926	73.326%
865-673	5	45	888	986	90.061%
865-673	6	447	408	934	43.683%
865-673	7	100	900	1,000	90.000%
865-673	8	461	361	878	41.116%
865-673	9	482	393		42.077%

<u> </u>				Total	
NPA-		Available	Assigned		
NXX	х	Numbers	Numbers	Resources	Utilization
865-686	0	480	411	916	44.869%
865-686	1	174	692	906	76.380%
	1			949	40.885%
865-686	3	301	388		42.931%
865-686	4	515	416	969	
865-686	7	264	658	967	68.046%
865-686	9	850	88	952	9.244%
865-687	0	212	606	882	68.707%
865-687	1	298	505	850	59.412%
865-687	2	98	649	850	76.353%
865-687	3	63	722	861	83.856%
865-687	4	164	602	849	70.907%
865-687	5	189	608	866	70.208%
865-687	6	56	705	851	82.844%
865-687	7	63	685	854	80.211%
865-687	8	82	709	859	82.538%
865-687	9	89	680	867	78.431%
865-688	0	313	490	842	58.195%
865-688	1	74	679	824	82.403%
865-688	2	202	608	852	71.362%
865-688	3	62	689	819	84.127%
865-688	4	61	690	836	82.536%
865-688	5	53	701	838	83.652%
865-688	6	501	366	883	41.450%
865-688	7	328	476	838	56.802%
865-688	8	171	604	848	71.226%
865-688	9	111	644	844	76.303%
865-689	0	536	324	910	35.604%
865-689	1	101	737	900	81.889%
865-689	2	86	683	837	81.601%
865-689	3				53.318%
865-689	4	363	450	844 833	
	4	56	703		84.394%
865-689	5	75	692	847	81.700%
865-689	6	65	665	827	80.411%
865-689	7	343	426	818	52.078%
865-689	8	554	318	888	35.811%
865-689	9	353	459	896	51.228%
865-690	0	191	561	811	69.174%
865-690	1	199	555	798	69.549%
865-690	2	299	449	784	57.270%
865-690	3	248	502	804	62.438%
865-690	4	39	662	771	85.863%
865-690	5	183	539	784	68.750%

				Total	
NPA-		Available	Assigned	l E	
NXX	X	Numbers	Numbers		Utilization
865-690	6	57	635	771	82.361%
865-690	7	158	574	797	72.020%
865-690	8	289	446	785	56.815%
865-690	9	35	654	772	84.715%
865-691	0	74	632	777	81.338%
865-691	1	74	610	775	78.710%
865-691	2	316	409	768	53.255%
865-691	3	322	434	793	54.729%
865-691	4	298	421	766	54.961%
865-691	5	319	405	767	52.803%
865-691	6	308	438	786	55.725%
865-691	7	302	456	795	57.358%
865-691	8	114	612	803	76.214%
865-691	9	470	328	819	40.049%
865-692	0	420	377	823	45.808%
865-692	1	411	375	830	45.181%
865-692	2	146	708	894	79.195%
865-692	3	477	382	887	43.067%
865-692	4	160	740	939	78.807%
865-692	5	54	787	895	87.933%
865-692	6	131	697	857	81.330%
865-692	8	524	304	875	34.743%
865-692	9	448	344	823	41.798%
865-693	0	29	692	808	85.644%
865-693	1	30	640	760	84.211%
865-693	2	27	686	789	86.946%
865-693	3	165	585	813	71.956%
865-693	4	29	681	792	85.985%
865-693	5	321	459	821	55.907%
865-693	6	316	418	777	53.797%
865-693	7	316	427	790	54.051%
865-693	8	154	605	804	75.249%
865-693	9	342	428	818	52.323%
865-694	0	349	429	823	52.126%
865-694	1	34	634	714	88.796%
865-694	2	50	401	907	44.212%
865-694	3	377	418	835	50.060%
865-694	4	304	415	780	53.205%
865-694	5	124	781	951	82.124%
865-694	6	36	478	583	81.990%
865-694	7	58	678	799	84.856%
865-694	8	354	416	814	51.106%

NPA- NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-694	9	385	380	794	47.859%
865-766	0	567	279	887	31.454%
865-766	1	700	300	1,000	30.000%
865-766	2	600	400	1,000	40.000%
865-766	3	599	401	1,000	40.100%
865-766	4	700	300	1,000	30.000%
865-766	6	534	403	937	43.010%
865-766	8	100	204	304	67.105%
865-769	0	505	290	836	34.689%
865-769	1	20	424	468	90.598%
865-769	2	532	340	886	38.375%
865-769	3	272	577	902	63.969%
865-769	4	381	383	798	47.995%
865-769	5	217	604	906	66.667%
865-769	6	431	523	976	53.586%
865-769	7	112	663	838	79.117%
865-769	8	431	321	772	41.580%
865-769	9	480	339	862	39.327%
865-773	1	1,000	0	1,000	0.000%
865-909	0	486	344	864	39.815%
865-909	2	0	1	1	100.000%
865-909	4	0	1,000	1,000	100.000%
865-909	5	0	1,000	1,000	100.000%
865-909	6	500	500	1,000	50.000%
865-909	7	599	401	1,000	40.100%
865-909	8	0	700	700	100.000%
865-909	9	215	675	916	73.690%
865-970	0	90	900	994	90.543%
865-970	1	0	998	998	100.000%
865-970	2	590	357	979	36.466%
865-970	3	798	182	985	18.477%
865-970	4	852	132	989	13.347%
865-970	5	98	902	1,000	90.200%
865-970	6	120	877	998	87.876%
865-970	7	841	143	988	14.474%
865-970	8	0	997	997	100.000%
865-970	9	860	123	991	12.412%
865-971	0	0	1,000	1,000	100.000%
865-971	1	183	623	848	73.467%
865-971	2	3	995	999	99.600%
865-971	3	75	623	747	83.400%
865-971	4	449	398	881	45.176%

NPA- NXX	x	Available Numbers	Assigned Numbers		Utilization
865-971	5	95	785	910	86.264%
865-971	6	18	929	971	95.675%
865-971	7	10	937	973	96.300%
865-971	8	0	1,000	1,000	100.000%
865-971	9	100	900	1,000	90.000%
865-974	8	0	1,000	1,000	100.000%
865-974	9	0	982	985	99.695%
865-985	1	962	34	999	3.403%
865-985	2	0	1,000	1,000	100.000%
865-985	3	0	1,000	1,000	100.000%
865-985	4	0	1,000	1,000	100.000%
865-985	5	0	1,000	1,000	100.000%
865-985	6	0	1,000	1,000	100.000%
865-985	7	80	872	952	91.597%
865-985	8	918	70	1,000	7.000%
865-985	9	997	2	1,000	0.200%

Totals: 153,214 374,958 549,581 68.226%

CERTIFICATE OF SERVICE

serv	I hereby certify that on July 7, 2008, yed on the parties of record, via the meth	a copy of the foregoing document was od indicated:
[]	Hand	Ms. Beth Sprague, Regional Director
[]	U.S. Mail	NANPA Code Administration
[]	Facsimile	46000 Center Oak Plaza
[]	Overnight Mail	Sterling, VA 20166
Y []	Overnight Mail Electronic Mail	Beth.sprague@neustar.biz

Joalle Mills