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July 9, 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 Sumner Regional Health Systems,

Docket No 08-00117

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 Sumner Regional Health Systems,
	Inc.
	Docket No.

PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL

AT&T Tennessee, pursuant to rules adopted by the FCC for challenging determinations of the Number Pooling Administrator ("NeuStar"), petitions the Tennessee Regulatory Authority (the "Authority") for an expedited review of NeuStar's denial of AT&T Tennessee's application for use of central office code numbering resources in the 615 area code.

AT&T Tennessee respectfully shows the Authority as follows:

- 1. AT&T Tennessee is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Gallatin 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 8, 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 4,000 in blocks 0, 1, 2 and 9 of the 615-328 code necessary to meet the demands of its customer, Sumner Regional Health Systems, Inc. ("Sumner Regional Health"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.
- 8. The code assignment request was for 4,000 in blocks 0, 1, 2 and 9 of the 615-328 code in the 615 NPA area code, in response to Sumner Regional Health's request for the remaining 4,000 numbers in the 615-328 code. Sumner Regional Health cited facility growth as its basis for this request. However, AT&T

Tennessee did not have sufficient number resources available within its inventory in the Gallatin rate center, and, accordingly, AT&T Tennessee was unable to provide Sumner Regional Health 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 Gallatin rate center had an MTE of approximately 8.7 months.
- 11. Despite the fact that AT&T Tennessee's Gallatin rate center may not exhaust for 8.7 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Sumner Regional Health within the Gallatin rate center. This is because the individual switch that serves this customer within the Gallatin rate center does not have sufficient number resources to meet the customer's request.
- 12. On or about July 8, 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 Sumner Regional Health is attached as Exhibit "D").
- 14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2008-1 NRUF and NPA Exhaust Analysis dated April 2008, the projected exhaust date of the 615 NPA is the Second Quarter 2013. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 615 NPA.
- 15. Both FCC 00-104 and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. See FCC 00-104, Appendix A, Final Rules, § 52.15(g) (3) (iv) ("The carrier may challenge the NeuStar's decision to the appropriate state regulatory commission"); NeuStar Central Office Code (NXX) Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").
- 16. The TRA has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific

Customer needs. The TRA has, for example, ordered NeuStar to provide AT&T Tennessee with numbering resources to meet the service requirements of the University of Tennessee, even though AT&T Tennessee had been unable to satisfy the required months-to-exhaust criteria. Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University of Tennessee - Chattanooga (approved by the Directors on November 20, 2001 by a vote of 3-0) (see correspondence from TRA Executive Secretary, dated November 29, 2001, attached as Exhibit "E").

- 17. In reviewing previous petitions of this type, the TRA Staff has requested that AT&T Tennessee provide additional information concerning number utilization for the specific central office involved in the request. This information for the Gallatin, including the GALLTNMADSO 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 Sumner Regional Health 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 Sumner Regional Health'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 Sumner Regional Health's needs, the NeuStar is preventing Sumner Regional Health 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 Sumner Regional Health in order that Sumner Regional Health 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 Sumner Regional Health in the Gallatin rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE

Guy M. Hicks

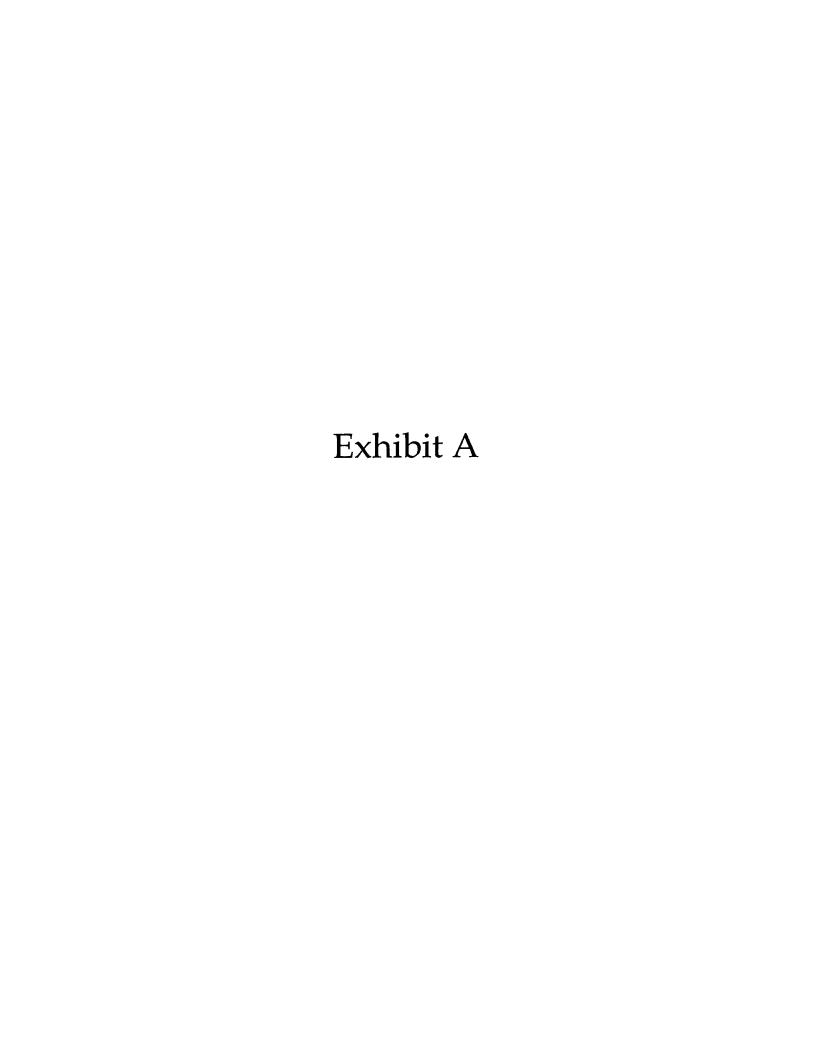
Joelle Phillips

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

(615) 214-6311

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2008, a copy of the foregoing document w served on the parties of record, via the method indicated:					
[]	Hand	Ms. Beth Sprague, Regional Director			
[]	U.S. Mail	NANPA Code Administrator			
[]	Facsimile	46000 Center Oak Plaza			
[]	Overnight Mail	Sterling, VA 20166			
	Electronic Mail	Beth.Sprague@neustar.biz			



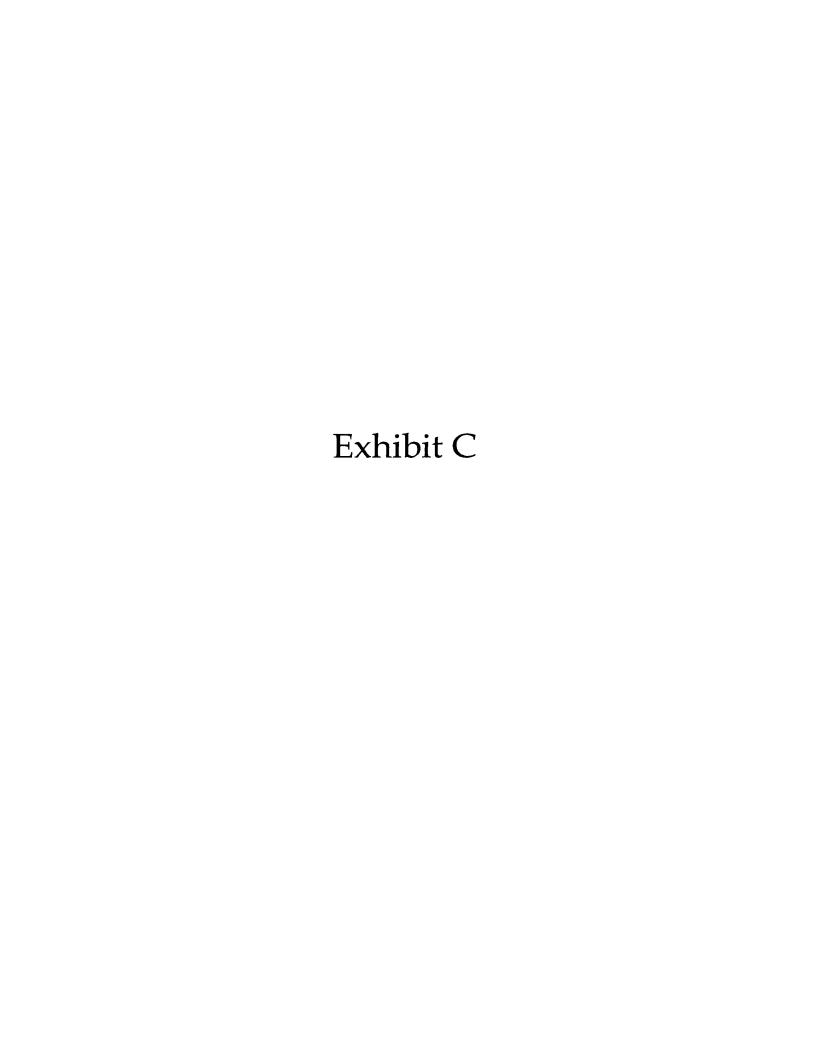
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	Tracking Number :	TN-221194	_	
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	Date of Receipt:	07/08/2008	_ Date of Response:	07/08/2008
	Service Provider Name:	BELLSOUTH SO	CNTL	
	(Telcordia TM LERG TM Routing Guide) OCN:	9419		4
	NPAC SOA SPID :			
	Pooling Administrator (Contact Information:		
	Genevieve Bettiga	Phone:		925-363 7652
	Signature of Pooling Adm	ninistrator		
	Genevieve Bettiga	Fax:		925-363 7683
	Name (print)			
	Email:	geneviev	re.bettiga@neusta	r.biz
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ŀ	If Yes,enter the num	ber of TNs contaminate	ed :	
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	Administration Guidelines for the appeals process.	
-	Request withdrawn. Explanation:	
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	¹ This is an eleven-character descriptor provided by the owning entity for the purpose 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.) Back	
1	กากationกากสายร จากอยู่ 2012 คือเอริโลก Inc Legal Notice	



Pooling Administration System Sign Out aida.armesto@att.com (SP) Time: 07/08/2008 03:50:59 PM EDT Printable Version May 16, 2008 Individual Block الـوا + Appendix 3 MONTHS TO EXHAUS? and UTILIZATION CERTIFICATION WORK SHEET - IN Level? Requests + PLICO/NXX Code (Thousands-Block Number Pooling Growth Block Request) Requests + டு_Confirm Resources In Service Tracking Number: 615-GALLATIN-TN-221194 + 🗓 Donate Blocks Company Name: BELLSOUTH SO CNTL Date: 07/08/2008 OCN:9419 + 🖺 Submit Forecast + 🗓 Search Forms Rate Center: GALLATIN + 🖺 Reports List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): + 🖭 User Profile 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:4431 B. Assigned Numbers: 29560 C. Total Numbering Resources: 36364 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 #7 #8 #9 #10 #11 #5 #6 #3 #4 #1 #2 E. Growth History -179 299 300 157 303 861 Previous 6 months³ F. Forecast 350 350 350 350 350 350 350 - Next 12 1350 350 350 350 350 months4 G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):516.667 H. Months Numbers Available for Assignment to

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	Exhaust ⁵	Customers(A)		
	=	Average Monthly Forecast	(G)	
		Block Requested 1	Available Numbers 4431	Months To Exhaust 8.576
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	Т	otal Numbering Resources(C)-l Numbers(D)	Excluded	
	Explanation:			
	¹ A copy of this v additional numb of this documen	worksheet is required to be suble ering resources in a rate center t.	mitted to the Pooling Administr For auditing purposes, the ap	ator when requesting plicant must retain a copy
	² Quantity of nur administrator an and 1 code rece	nbers activated in the past 90 d id shall be reported in incremen sived =10,000).	ays is based on blocks and/or ts of 1,000 or 10,000 TNs (e. g	codes received from the 1.: 2 blocks received=2,000
	³ Net change in distant month as	TNs no longer available for assi s Month #1, and Month #6 as th	gnment in each previous mont e current month.	h, starting with the most
		s needed in each following mor		nt month as Month #1.
	⁵ To be assigned than or equal to	d an additional thousands-block 6 months. (FCC 00-104, sectio	(NXX-X) for growth, "Months t in 52.15 (g) (3) (iii)).	o Exhaust" must be less
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Service Provider Name:	BELLSOUTH SC	CNTL	
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Routing Guide) OCN:	3413		
NPAC SOA SPID :			
Pooling Administrator C	ontact Information:		925-363
Genevieve Bettiga	Phone:		7652
Signature of Pooling Adm	inistrator		005.000
Genevieve Bettiga	Fax:		925-363 7683
Name (print)	19		
Email:	genevie	ve.bettiga@neustar	.biz
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Block Contaminated	(Yes or No) :		
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Quantion? Email us at 1997 2012 NeuStar for Legal Notice

Petition of AT&T Tennessee Sumner Regional Health Systems, Inc. Exhibit D



6/12/2008

John Buchanan
BellSouth Business
24th Floor
333 Commerce Street
Nashville, Tn 37201

Dear: Mr. John Buchanan,

This letter is to serve as an amendment to the previous request for a new Gallatin prefix. Sumner Regional Health Systems has built a 7 story patient tower at 555 Hartsville Pike in Gallatin, Tennessee. We have constructed this building to provide additional patient rooms, a much needed larger Emergency Room, Diagnostic services, additional surgery suites, a larger Critical Care area, along with clinical and administrative offices. We received the NXX of 328 in January 2007 in the range of 328-3000 through 328-8999, but we have found that we are on need of the entire 328 prefix.

I am requesting to increase the amount of numbers needed in the 328 prefix from the original 6000 to the full 10,000 numbers. This would help us to align all of our internal extensions with direct dials of which all have the same prefix across our entire Health System. These numbers are desperately needed for patient and physician satisfaction along with providing access to all of the diagnostic, clinical, and office areas.

Anything that you can do to help us to acquire these numbers would be greatly appreciated. Please contact me if you have further questions at 615-328-6694.

(any Ca)

SRHS Director of Telecommunications

David Young \

CIO Sumner Regional Health Systems

TENNESSEE REGULATORY AUTHORITY

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



460 James Robertson Parkway Nachville, Tennesses 37243-0505

November 29, 2001

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

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

Dear Ms. Dixon:

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

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

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

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

Sincerely,

K D W Lease

K. David Waddell
Resoutive Secretary

CC: Brent Struthers, NewStar

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

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 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.

MORTH CAROLINA UTILITIES COMMISSION

Lesur A Kigpen

Geneva S. Thigpen, Chief Clerk

040001.02

Gallatin Exchange					
		Available	Assigned	Total Number	
NPA-NXX	x	Numbers	Numbers	Resources	Utilization
615-206	0	381	455	904	50.332%
615-206	1	432	458	943	48.568%
615-206	6	18	906	938	96.588%
615-206	9	412	445	910	48.901%
615-230	0	97	701	950	73.789%
615-230	1	105	801	959	83.525%
615-230	2	32	732	825	88.727%
615-230	3	77	276	385	71.688%
615-230	4	16	632	689	91.727%
615-230	5	126	580	755	76.821%
615-230	6	126	706	927	76.160%
615-230	7	123	687	913	75.246%
615-230	8	107	729	925	78.811%
615-230	9	207	646	933	69.239%
615-328	3	0	1,000	1,000	100.000%
615-328	4	0	1,000	1,000	100.000%
615-328	5	0	1,000	1,000	100.000%
615-328	6	0	1,000	1,000	100.000%
615-328	7	0	1,000	1,000	100.000%
615-328	8	0	1,000	1,000	100.000%
615-451	0	136	725	929	78.041%
615-451	1	161	710	931	76.262%
615-451	2	76	741	906	81.788%
615-451	3	134	700	913	76.670%
615-451	4	182	667	919	72.579%
615-451	5	87	711	863	82.387%
615-451	6	145	680	881	77.185%
615-451	7	331	546	931	58.647%
615-451	8	1	998	1,000	99.800%
615-451	9	101	679	926	73.326%
615-452	0	93	758	937	80.896%
615-452	1	89	757	920	82.283%
615-452	2	81	766	903	84.828%
615-452	3	60	802	934	85.867%
615-452	4	94	758	921	82.302%
615-452	5	65	781	917	85.169%
615-452	6	104	746	908	82.159%
615-452	7	102	748	935	80.000%
615-452	8	58	766	906	84.547%
615-452	9	72	767	928	82.651%

Totals: 4,431 29,560 36,364 81.289%