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March 23, 2009

VIA HAND DELIVERY

filed electronically in docket office on 03/23/09

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

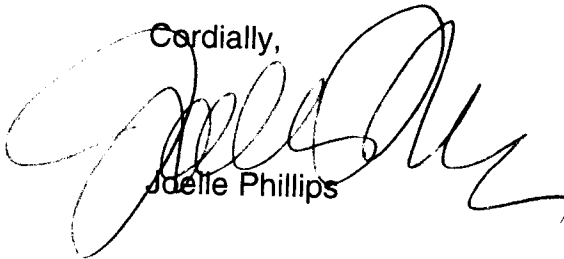
RE: *Petition for Expedited Review of Growth Code Denial by the Number
Pooling Administrator Relating to Volkswagen Group of America*
Docket No 09-00043

Dear Chairman Roberson

:

Enclosed are the original and four copies of AT&T Tennessee's *Petition for Expedited Review of Central Office Code Denial*. Copies of the enclosed are being provided to counsel for the Number Pooling Administrator.

Cordially,



Joelle Phillips

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 Volkswagen Group of America*

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 423 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 Chattanooga 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 March 20, 2009, 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 2,000 consecutive numbers necessary to meet the demands of its customer, Volkswagen Group of America ("Volkswagen"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 2,000 consecutive numbers in the 423 NPA area code, in response to Volkswagen's request for 2,000 consecutive DID numbers in the NPA-XX2-3000-4999 range. Volkswagen cited new production plant as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Chattanooga rate center, and, accordingly, AT&T Tennessee was unable to provide Volkswagen 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 Chattanooga rate center had an MTE of approximately 14 months.

11. Despite the fact that AT&T Tennessee's Chattanooga rate center may not exhaust for 14 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Volkswagen within the Chattanooga rate center. This is because the individual switch that serves this customer within the Chattanooga rate center does not have sufficient number resources to meet the customer's request.

12. On or about March 20, 2009, 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 Volkswagen is attached as Exhibit "D").

14. Relief for the 423 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 423 NPA with a Pool Start Date of September 1, 2002. According to NeuStar, based on the 2008-2 NRUF and NPA Exhaust Analysis dated October 2008, the projected exhaust date of the 423 NPA is the First Quarter 2017. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 423 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 Chattanooga, including the CHTGTNBRDS0 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 Volkswagen 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 Volkswagen'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 Volkswagen's needs, the NeuStar is preventing Volkswagen 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

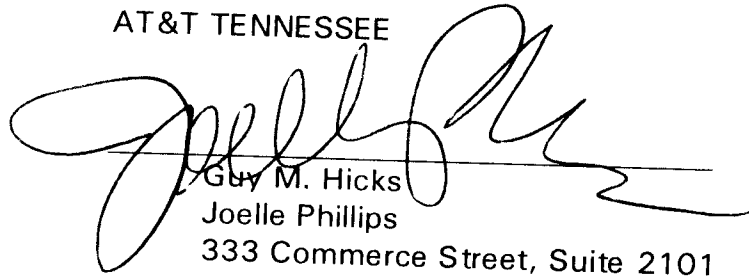
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct the NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of Volkswagen in order that Volkswagen may receive the service of its choice from the 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 Volkswagen in the Chattanooga rate center within the 423 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 March 23, 2009, 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. Beth Sprague, Regional Director
NANPA Code Administrator
46000 Center Oak Plaza
Sterling, VA 20166
Beth.Sprague@neustar.biz

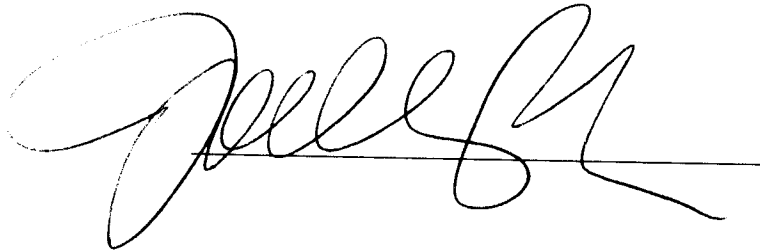
A handwritten signature in black ink, appearing to read 'Beth Sprague', is written over a horizontal line.

Exhibit A

Pooling Administration System



rena.wilkie@att.com (SP)

- **Sign Out**

Time : 03/20/2009 03:12:51 PM EDT

[Printable Version](#)

TBPAG Attachment 1 - March 19, 2007

1. *What is the main purpose of the study?*
 2. *What are the research objectives?*
 3. *What is the research methodology?*
 4. *What are the findings of the study?*
 5. *What are the conclusions of the study?*
 6. *What are the limitations of the study?*
 7. *What are the implications of the study?*
 8. *What are the future research directions?*
 9. *What are the contributions of the study?*
 10. *What are the key words of the study?*

Tracking
Number: **423-
CHATTNOOGA-
TN-280283**
**Individual
Block Request**

Type of Application:	New	Change	Disconnect
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GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH SO CNTL**

Headquarters
Address: **675 West Peachtree St ne**

City, State, Zip: **atlanta, GA, 30375**

Contact Name: **rena butticaz**

Contact Address: **675 West Peachtree St NE**

City, State, Zip: **Atlanta , GA , 30375**

Phone: 770- 945-9630 FAX: 770-945-9630 E-mail: rw0052@att.com

Pooling Administrator: ii

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 ☒ LRN needed ⁱⁱⁱ

NPA: 423	LATA: 472	OCN: iv 9419	Parent Company's OCN 9400
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Number of Thousands-Blocks Requested 2

Switching Identification(Switch Entity/POI) **CHTGTNBRDS0**

Rate Center: VI

City or Wire Center Name :

CHATTNOOGA

Rate Center Sub Zone:

1.3 Dates:Date of Application: ^{vii}
03/20/2009Requested Block Effective Date: ^{viii}
04/20/2009

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

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)

REQUEST 423-521-7&8d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
CUSTOMER CANNOT USE BLOCKS BEGINNING IN 0 OR 9

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 ^{ix} Switching Id Part 1BOCN:Inter-company ^x 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 as of the date of this application.

rena butticaz

**Associate
Technical
Support
Analyst** 03/20/2009

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™ LERG™ 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™ 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™ tandem of the facilities based provider^{xi}. 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. The 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 :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} 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).

^v 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 CLLITM 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



rena.wilkie@att.com (SP)

• Sign Out

Time : 03/20/2009 03:13:12 PM EDT

Printable Version

May 16, 2008

Appendix 3

ATTN: NXX BLOCK REQUEST FOR UTILIZATION ON GROWTH WORK SHEET - NXX-1701

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **423-CHATTNOOGA-TN-280283**Date: **03/20/2009**OCN: **9419**Company Name: **BELLSOUTH SO CNTL**Rate Center: **CHATTNOOGA**

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

Name of Block Applicant: **rena buttica**Signature: **rena buttica**Title: **Associate Technical Support Analyst**Telephone No.: **770-945-9630**FAX No.: **770-945-9630**E-mail: **rw0052@att.com**A. Available Numbers: **124671**B. Assigned Numbers: **333966**C. Total Numbering Resources: **484694**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 #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 ³

3014	1437	769	26436	678	634
-------------	-------------	------------	--------------	------------	------------

F. Forecast
- Next 12
months ⁴

5495	25495	5495	5495	5495	5495	5495	5495	5495	5495	5495	5495
-------------	--------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) **8828.333**

H. Months
to

Numbers Available for Assignment to

Exhaust ⁵ =	Customers(A)		
	Average Monthly Forecast(G)		
	Block Requested	Available Numbers	Months To Exhaust
	1	124671	14.122
	2	125671	14.235

I.
Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 68.902

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

Explanation:

¹ 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.

² 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).

³ 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.

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

⁵ 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)).

⁶ 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



rena.wilkie@att.com (SP)

• Sign Out

Time : 03/20/2009 03:12:08 PM EDT

Monthly Pooling Administration System - Worksheet - IN Levels - Utilized

Your Utilization calculates to 68.902%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Need to request a State Waiver
- ☐ Received a State Waiver

Pooling Administration System



rena.wilkie@att.com (SP)

• Sign Out

Time : 03/20/2009 03:13:51 PM EDT

Printable Version

Attachment 3

November 21, 2003

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
NPAC Part 3Tracking Number : **423-
CHATTNOOGA-
TN-280283**Date of Application: **03/20/2009** Effective Date: _____
Date of Receipt: **03/20/2009** Date of Response: **03/20/2009**Service Provider Name: **BELLSOUTH SO CNTL**(Telcordia TM LERG TM
Routing Guide) OCN: **9419**

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: **925-
363-7652**Signature of Pooling
AdministratorGenevieve Bettiga Fax: **925-
363-7683**

Name (print)

Email: **genevieve.bettiga@neustar.biz**NPA-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): ¹**CHTGTNBRDS0**

Rate Center:

CHATTNOOGA

Rate Center Sub Zone: _____

☒ 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:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM 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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VOLKSWAGEN

GROUP OF AMERICA

Petition of AT&T Tennessee
Volkswagen Group of America
Exhibit D

Traci M. Gaulin
Sales Executive
AT&T Premier Client Group
AT&T Number Administration/Code Administration

Allen Piercy
CTO
ITP&O
248-754-5562
248-754-5290
allen.piercy@vw.com

NAME
TITLE
DEPARTMENT
PHONE
FAX
E-MAIL

December 8, 2008

DATE

Dear Traci,

This Letter of Intent, is for Volkswagen Group of America to request 2000 numbers for LNS Prime Service. Telephone numbers need to be consecutive due to advertising and proper management of a number range this size. This will be a brand new production plant for Volkswagen. Volkswagen Group of America agrees to activate the numbers requested within 180 days from AT&T's receipt of the requested numbers. Volkswagen Group of America intends to order service using these numbers immediately after required testing is performed by AT&T. This service will be provided in the Chattanooga rate center using the CHTGTNKVDS0 switch.

VOLKSWAGEN GROUP OF AMERICA, INC
7000 DISCOVERY DRIVE
CHATTANOOGA, TN 37416

The following indicate blocks of numbers due to our internal private dialing plan:

Site Name	Area	NXX	DID
	Code		
Auburn Hills HCW	248	754	44000-46999
Rochester Hills HCE	248	754	43000-43999
Ajax PDC, Ontario Canada	905	428	84800-84899
Ajax PDC	905	428	85550-85559
Ajax PDC	905	428	85575-85589
Ajax PDC	905	428	85591-85599
Ajax PDC	905	428	85670-85699
Ajax PDC	905	428	85800-85899
Ajax PDC	905	428	86700-86700
Cranbury PDC	609	395	52000-52299
Fort Lee, New Jersey	201	227	77900-77999
Fort Worth PDC	817	230	22300-22379
Jacksonville PDC (new)	904	693	37400- 37559
Los Angeles PDC	909	673	39200-39259

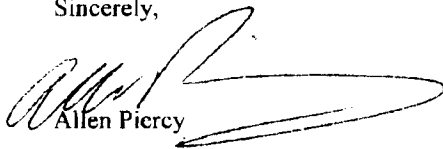
L.A. PDC	909	673	39480-39499
Miami Florida SA	305	648	84489-84588
Palo Alto, California	650	496	67000-67199
Vancouver PDC	604	233	39000-39199
Westlake Village	818	575	55500-55799
Wisconsin PDC	262	577	72000-72099
Wisconsin	262	577	72300-72399

Volkswagen Group of America would prefer the DID range below because it fits into our five digit dialing plan.

Chattanooga Plant	XXX	XX2	23000-24999
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Volkswagen Group of America is in the process of constructing an automotive assembly plant at Enterprise South with the expectation of producing 150,000 cars per year. Along with the assembly plant, VW will build an administration building that will house hundreds of employees who are responsible for the operations of the plant. Therefore, VW will need up to 2000 consecutive numbers to support the plant and adjacent administration facilities.

Sincerely,



Allen Piercy

/lm

TENNESSEE REGULATORY AUTHORITY



Sara Kyle, Chairman
Lynn Greer, Director
Melvin Malone, Director

460 James Robertson Parkway
Nashville, Tennessee 37243-0005

November 29, 2001

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

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

Dear Ms. Dixon:

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

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

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

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

Sincerely,

A handwritten signature in 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) 741-8993
www.state.nv.us/tra

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-55, SUB 1268

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Petition of BellSouth Telecommunications, Inc.,	ORDER RULING ON THE
for Review of NANPA Denial of Application)	BELLSOUTH PETITION
for Numbering Resources)	

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

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

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

WHEREUPON, the Commission now reaches the following

CONCLUSIONS

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

IT IS, THEREFORE, ORDERED as follows:

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


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

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

ISSUED BY ORDER OF THE COMMISSION.

This the 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in cursive script, reading "Geneva S. Thigpen".

Geneva S. Thigpen, Chief Clerk

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-209	0	0	1,000	1,000	100.000%
423-209	1	386	607	997	60.883%
423-209	2	233	697	951	73.291%
423-209	3	0	600	600	100.000%
423-209	4	100	500	600	83.333%
423-209	5	135	864	999	86.486%
423-209	6	0	1,000	1,000	100.000%
423-209	7	24	976	1,000	97.600%
423-209	8	0	1,000	1,000	100.000%
423-209	9	3	967	973	99.383%
423-265	0	331	387	841	46.017%
423-265	1	494	374	892	41.928%
423-265	2	365	417	831	50.181%
423-265	3	523	356	898	39.644%
423-265	4	462	378	864	43.750%
423-265	5	506	375	905	41.436%
423-265	6	527	376	920	40.870%
423-265	7	572	306	902	33.925%
423-265	8	522	365	907	40.243%
423-265	9	505	338	889	38.020%
423-266	0	383	487	917	53.108%
423-266	1	286	539	904	59.624%
423-266	2	364	488	914	53.392%
423-266	3	300	548	922	59.436%
423-266	4	415	461	915	50.383%
423-266	5	512	355	894	39.709%
423-266	6	421	396	862	45.940%
423-266	7	512	407	934	43.576%
423-266	8	455	428	918	46.623%
423-266	9	550	368	949	38.778%
423-267	0	331	480	894	53.691%
423-267	1	534	327	883	37.033%
423-267	2	538	370	928	39.871%
423-267	3	562	295	888	33.221%
423-267	4	522	354	905	39.116%
423-267	5	548	322	894	36.018%
423-267	6	590	294	900	32.667%
423-267	7	524	360	903	39.867%
423-267	8	511	356	910	39.121%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-267	9	488	365	877	41.619%
423-287	0	0	1,000	1,000	100.000%
423-287	1	0	1,000	1,000	100.000%
423-287	2	0	1,000	1,000	100.000%
423-287	3	0	1,000	1,000	100.000%
423-287	4	100	900	1,000	90.000%
423-287	5	0	1,000	1,000	100.000%
423-287	6	0	1,000	1,000	100.000%
423-287	7	0	1,000	1,000	100.000%
423-287	8	0	1,000	1,000	100.000%
423-287	9	0	1,000	1,000	100.000%
423-296	0	521	390	936	41.667%
423-296	1	59	730	854	85.480%
423-296	2	195	737	979	75.281%
423-296	3	6	902	915	98.579%
423-296	4	26	798	878	90.888%
423-296	5	0	782	782	100.000%
423-296	6	154	680	939	72.417%
423-296	8	55	512	649	78.891%
423-296	9	53	839	961	87.305%
423-321	0	281	416	700	59.429%
423-321	1	226	711	937	75.880%
423-321	3	599	390	995	39.196%
423-321	6	0	700	900	77.778%
423-321	7	0	1,000	1,000	100.000%
423-321	8	0	1,000	1,000	100.000%
423-321	9	82	914	999	91.491%
423-326	0	359	486	895	54.302%
423-326	1	434	416	901	46.171%
423-326	2	499	381	935	40.749%
423-326	3	557	344	936	36.752%
423-344	0	132	631	905	69.724%
423-344	1	209	590	906	65.121%
423-344	2	158	635	877	72.406%
423-344	3	224	608	902	67.406%
423-344	4	329	507	907	55.899%
423-344	5	145	666	898	74.165%
423-344	6	120	682	886	76.975%
423-344	7	146	652	874	74.600%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-344	8	134	704	895	78.659%
423-344	9	133	695	898	77.394%
423-386	0	0	1,000	1,000	100.000%
423-386	1	200	800	1,000	80.000%
423-386	2	379	488	875	55.771%
423-386	3	109	870	980	88.776%
423-386	4	0	999	999	100.000%
423-386	6	0	1,000	1,000	100.000%
423-386	7	0	1,000	1,000	100.000%
423-386	8	0	1,000	1,000	100.000%
423-386	9	0	1,000	1,000	100.000%
423-425	1	242	22	264	8.333%
423-425	3	496	116	623	18.620%
423-425	4	700	0	700	0.000%
423-425	5	1	1	2	50.000%
423-425	6	364	32	696	4.598%
423-425	7	533	7	834	0.839%
423-425	8	0	1	1	100.000%
423-480	0	0	1,000	1,000	100.000%
423-480	1	0	1,000	1,000	100.000%
423-480	2	0	1,000	1,000	100.000%
423-480	3	0	1,000	1,000	100.000%
423-480	4	0	1,000	1,000	100.000%
423-480	5	0	1,000	1,000	100.000%
423-480	6	0	1,000	1,000	100.000%
423-480	7	0	1,000	1,000	100.000%
423-480	8	0	1,000	1,000	100.000%
423-480	9	0	1,000	1,000	100.000%
423-485	0	315	632	978	64.622%
423-485	1	411	471	931	50.591%
423-485	2	500	500	1,000	50.000%
423-485	3	600	100	1,000	10.000%
423-485	4	600	200	960	20.833%
423-485	5	100	812	915	88.743%
423-485	6	445	555	1,000	55.500%
423-485	7	774	80	875	9.143%
423-485	8	474	349	909	38.394%
423-485	9	446	433	904	47.898%
423-490	0	326	460	838	54.893%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-490	1	31	839	911	92.097%
423-490	2	73	716	804	89.055%
423-490	3	21	821	860	95.465%
423-490	4	48	840	912	92.105%
423-490	5	5	972	988	98.381%
423-490	6	0	1,000	1,000	100.000%
423-490	7	1	999	1,000	99.900%
423-490	8	21	916	965	94.922%
423-490	9	0	1,000	1,000	100.000%
423-493	0	200	654	965	67.772%
423-493	1	62	784	884	88.688%
423-493	2	139	540	761	70.959%
423-493	4	52	540	601	89.850%
423-493	5	46	229	377	60.743%
423-493	6	200	800	1,000	80.000%
423-493	7	106	846	957	88.401%
423-493	8	45	926	992	93.347%
423-493	9	239	582	943	61.718%
423-495	0	781	128	921	13.898%
423-495	1	128	732	972	75.309%
423-495	2	0	1,000	1,000	100.000%
423-495	3	0	1,000	1,000	100.000%
423-495	4	0	1,000	1,000	100.000%
423-495	5	0	1,000	1,000	100.000%
423-495	6	0	1,000	1,000	100.000%
423-495	7	0	1,000	1,000	100.000%
423-495	8	0	1,000	1,000	100.000%
423-495	9	519	192	713	26.928%
423-499	0	376	446	851	52.409%
423-499	1	86	848	962	88.150%
423-499	2	54	810	918	88.235%
423-499	3	38	823	912	90.241%
423-499	4	55	761	887	85.795%
423-499	5	324	410	850	48.235%
423-499	6	35	790	875	90.286%
423-499	7	200	800	1,000	80.000%
423-499	8	285	348	664	52.410%
423-499	9	132	586	832	70.433%
423-510	0	376	437	858	50.932%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-510	1	290	616	923	66.739%
423-510	2	0	991	993	99.799%
423-510	3	0	1,000	1,000	100.000%
423-510	4	0	940	940	100.000%
423-510	5	0	1,000	1,000	100.000%
423-510	6	0	999	1,000	99.900%
423-510	7	1	974	979	99.489%
423-510	8	485	379	900	42.111%
423-510	9	462	368	871	42.250%
423-517	0	368	494	936	52.778%
423-517	1	200	1	201	0.498%
423-517	2	500	0	500	0.000%
423-517	5	480	0	480	0.000%
423-517	6	700	0	700	0.000%
423-517	7	0	1	1	100.000%
423-517	8	262	695	970	71.649%
423-517	9	726	133	885	15.028%
423-535	1	0	1,000	1,000	100.000%
423-535	2	0	1,000	1,000	100.000%
423-535	3	0	1,000	1,000	100.000%
423-535	4	0	1,000	1,000	100.000%
423-535	5	0	1,000	1,000	100.000%
423-535	6	0	1,000	1,000	100.000%
423-535	7	0	1,000	1,000	100.000%
423-535	8	0	1,000	1,000	100.000%
423-553	0	462	273	955	28.586%
423-553	1	201	570	832	68.510%
423-553	2	0	1,000	1,000	100.000%
423-553	3	0	1,000	1,000	100.000%
423-553	4	0	1,000	1,000	100.000%
423-553	5	66	683	772	88.472%
423-553	6	297	470	818	57.457%
423-553	7	457	450	931	48.335%
423-553	8	83	769	925	83.135%
423-553	9	602	299	916	32.642%
423-622	0	180	568	888	63.964%
423-622	1	242	558	898	62.138%
423-622	2	215	553	893	61.926%
423-622	3	212	585	914	64.004%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-622	4	233	563	910	61.868%
423-622	5	189	578	889	65.017%
423-622	6	195	570	877	64.994%
423-622	7	211	590	903	65.338%
423-622	8	391	483	916	52.729%
423-622	9	156	619	912	67.873%
423-624	0	178	656	909	72.167%
423-624	1	460	426	921	46.254%
423-624	2	197	580	882	65.760%
423-624	3	421	459	906	50.662%
423-624	4	188	598	890	67.191%
423-624	5	466	433	926	46.760%
423-624	6	200	549	873	62.887%
423-624	7	465	441	938	47.015%
423-624	8	446	448	926	48.380%
423-624	9	447	427	922	46.312%
423-629	0	403	468	915	51.148%
423-629	1	161	634	903	70.210%
423-629	2	176	581	867	67.013%
423-629	3	65	679	758	89.578%
423-629	4	413	440	882	49.887%
423-629	5	472	409	914	44.748%
423-629	6	437	431	905	47.624%
423-629	7	209	575	908	63.326%
423-629	8	65	150	276	54.348%
423-629	9	228	569	917	62.050%
423-634	0	199	497	927	53.614%
423-634	1	218	720	977	73.695%
423-634	2	666	281	973	28.880%
423-634	3	110	807	942	85.669%
423-634	4	316	684	1,000	68.400%
423-634	5	386	556	976	56.967%
423-634	6	241	745	994	74.950%
423-634	7	652	320	987	32.421%
423-634	8	693	247	978	25.256%
423-634	9	264	683	987	69.200%
423-642	0	0	5	1,000	0.500%
423-642	1	0	2	1,000	0.200%
423-642	2	0	0	1,000	0.000%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-642	3	0	0	1,000	0.000%
423-642	4	0	19	788	2.411%
423-642	5	0	10	590	1.695%
423-642	6	0	999	1,000	99.900%
423-642	7	0	1,000	1,000	100.000%
423-642	8	0	600	996	60.241%
423-642	9	0	19	1,000	1.900%
423-668	0	0	1,000	1,000	100.000%
423-668	1	0	1,000	1,000	100.000%
423-668	2	155	498	675	73.778%
423-668	3	300	500	800	62.500%
423-668	4	500	500	1,000	50.000%
423-668	5	416	381	797	47.804%
423-668	6	0	1,000	1,000	100.000%
423-668	7	0	1,000	1,000	100.000%
423-668	8	0	1,000	1,000	100.000%
423-668	9	165	720	896	80.357%
423-697	0	121	435	602	72.259%
423-697	1	135	686	866	79.215%
423-697	2	234	729	970	75.155%
423-697	3	93	861	954	90.252%
423-697	4	141	797	978	81.493%
423-697	5	300	700	1,000	70.000%
423-697	6	4	535	539	99.258%
423-697	7	526	390	935	41.711%
423-697	8	85	822	970	84.742%
423-697	9	338	498	898	55.457%
423-698	0	189	592	897	65.998%
423-698	1	180	627	897	69.900%
423-698	2	263	542	906	59.823%
423-698	3	186	566	848	66.745%
423-698	4	176	577	868	66.475%
423-698	5	188	567	881	64.359%
423-698	6	388	447	885	50.508%
423-698	7	446	448	930	48.172%
423-698	8	218	583	898	64.922%
423-698	9	172	429	720	59.583%
423-751	0	0	1,000	1,000	100.000%
423-751	1	0	1,000	1,000	100.000%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-751	2	0	1,000	1,000	100.000%
423-751	3	0	1,000	1,000	100.000%
423-751	4	0	1,000	1,000	100.000%
423-751	5	0	1,000	1,000	100.000%
423-751	6	0	1,000	1,000	100.000%
423-751	7	0	1,000	1,000	100.000%
423-751	8	0	1,000	1,000	100.000%
423-751	9	0	1,000	1,000	100.000%
423-752	0	83	713	955	74.660%
423-752	1	136	549	711	77.215%
423-752	2	458	124	620	20.000%
423-752	3	457	433	938	46.162%
423-752	4	319	506	907	55.788%
423-752	5	282	527	849	62.073%
423-752	6	574	180	959	18.770%
423-752	7	836	95	942	10.085%
423-752	8	539	322	915	35.191%
423-752	9	422	345	981	35.168%
423-755	0	362	522	910	57.363%
423-755	2	487	495	987	50.152%
423-755	4	1	997	999	99.800%
423-755	5	211	482	996	48.394%
423-755	6	333	342	900	38.000%
423-755	7	617	234	878	26.651%
423-755	8	732	236	976	24.180%
423-755	9	9	901	920	97.935%
423-756	0	420	495	936	52.885%
423-756	1	195	634	914	69.365%
423-756	2	308	563	925	60.865%
423-756	3	281	580	930	62.366%
423-756	4	430	442	933	47.374%
423-756	5	299	550	931	59.076%
423-756	6	326	459	843	54.448%
423-756	7	356	525	921	57.003%
423-756	8	239	586	911	64.325%
423-756	9	387	552	964	57.261%
423-757	0	145	350	520	67.308%
423-757	1	391	608	999	60.861%
423-757	2	140	844	991	85.166%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-757	3	0	1,000	1,000	100.000%
423-757	4	110	735	876	83.904%
423-757	5	31	498	543	91.713%
423-757	6	81	116	199	58.291%
423-757	7	384	161	554	29.061%
423-757	8	130	868	999	86.887%
423-757	9	332	564	920	61.304%
423-763	0	510	153	669	22.870%
423-763	2	400	600	1,000	60.000%
423-763	4	5	870	880	98.864%
423-763	5	6	804	810	99.259%
423-763	6	0	400	400	100.000%
423-763	7	998	1	1,000	0.100%
423-763	9	518	72	594	12.121%
423-778	0	0	1,000	1,000	100.000%
423-778	1	0	1,000	1,000	100.000%
423-778	2	0	1,000	1,000	100.000%
423-778	3	0	1,000	1,000	100.000%
423-778	4	0	1,000	1,000	100.000%
423-778	5	0	1,000	1,000	100.000%
423-778	6	0	1,000	1,000	100.000%
423-778	7	0	999	1,000	99.900%
423-778	8	0	1,000	1,000	100.000%
423-778	9	0	1,000	1,000	100.000%
423-785	0	0	978	1,000	97.800%
423-785	1	0	800	800	100.000%
423-785	2	174	616	799	77.096%
423-785	3	28	934	994	93.964%
423-785	4	52	931	1,000	93.100%
423-785	5	4	596	603	98.839%
423-785	8	0	700	800	87.500%
423-785	9	9	955	997	95.787%
423-821	0	496	413	943	43.796%
423-821	1	506	389	923	42.145%
423-821	2	200	591	929	63.617%
423-821	3	553	339	923	36.728%
423-821	4	522	404	947	42.661%
423-821	5	287	505	930	54.301%
423-821	6	273	577	948	60.865%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-821	7	550	345	921	37.459%
423-821	8	523	359	933	38.478%
423-821	9	529	370	951	38.906%
423-822	0	775	166	969	17.131%
423-822	1	737	210	953	22.036%
423-822	3	308	578	947	61.035%
423-822	4	127	793	920	86.196%
423-822	6	781	190	980	19.388%
423-822	7	767	209	981	21.305%
423-822	9	700	260	974	26.694%
423-825	0	524	398	934	42.612%
423-825	1	566	341	928	36.746%
423-825	2	53	841	939	89.563%
423-825	3	465	445	910	48.901%
423-825	4	0	1,000	1,000	100.000%
423-825	5	503	409	933	43.837%
423-825	6	604	315	953	33.054%
423-825	7	223	739	983	75.178%
423-825	8	0	820	820	100.000%
423-825	9	0	1,000	1,000	100.000%
423-827	0	712	227	984	23.069%
423-827	1	300	700	1,000	70.000%
423-842	0	109	675	875	77.143%
423-842	1	115	681	874	77.918%
423-842	2	100	708	886	79.910%
423-842	3	101	688	863	79.722%
423-842	4	300	574	897	63.991%
423-842	5	104	722	893	80.851%
423-842	6	126	683	883	77.350%
423-842	7	108	697	878	79.385%
423-842	8	302	531	885	60.000%
423-842	9	263	545	869	62.716%
423-843	0	275	546	878	62.187%
423-843	1	120	639	872	73.280%
423-843	2	316	447	883	50.623%
423-843	3	334	518	901	57.492%
423-843	4	188	761	974	78.131%
423-843	5	662	282	972	29.012%
423-843	6	0	1,000	1,000	100.000%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-843	7	0	1,000	1,000	100.000%
423-843	8	0	1,000	1,000	100.000%
423-843	9	359	486	889	54.668%
423-846	0	0	1,000	1,000	100.000%
423-846	1	0	999	999	100.000%
423-846	2	0	1,000	1,000	100.000%
423-846	3	0	1,000	1,000	100.000%
423-846	4	0	1,000	1,000	100.000%
423-846	5	0	1,000	1,000	100.000%
423-846	6	0	1,000	1,000	100.000%
423-846	7	0	1,000	1,000	100.000%
423-846	8	0	1,000	1,000	100.000%
423-846	9	0	1,000	1,000	100.000%
423-847	0	369	480	900	53.333%
423-847	1	278	534	905	59.006%
423-847	3	594	317	962	32.952%
423-847	6	477	393	944	41.631%
423-847	8	481	403	921	43.757%
423-847	9	443	429	904	47.456%
423-855	0	274	467	798	58.521%
423-855	1	296	474	832	56.971%
423-855	2	84	528	717	73.640%
423-855	3	84	684	810	84.444%
423-855	4	103	617	838	73.628%
423-855	5	302	486	835	58.204%
423-855	6	123	761	913	83.352%
423-855	7	400	433	902	48.004%
423-855	8	81	656	811	80.888%
423-855	9	123	543	808	67.203%
423-867	0	567	305	933	32.690%
423-867	1	526	393	942	41.720%
423-867	2	506	399	933	42.765%
423-867	3	524	378	930	40.645%
423-867	4	339	502	913	54.984%
423-867	5	282	565	921	61.346%
423-867	6	708	235	970	24.227%
423-867	7	475	412	912	45.175%
423-867	8	230	677	961	70.447%
423-867	9	284	497	924	53.788%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-870	0	63	684	857	79.813%
423-870	1	114	679	888	76.464%
423-870	2	402	457	901	50.721%
423-870	3	385	439	904	48.562%
423-870	4	387	475	898	52.895%
423-870	5	419	416	886	46.953%
423-870	6	529	346	921	37.568%
423-870	7	139	412	592	69.595%
423-870	8	150	650	889	73.116%
423-870	9	146	622	879	70.762%
423-874	0	384	493	905	54.475%
423-874	1	51	894	971	92.070%
423-874	2	0	1,000	1,000	100.000%
423-874	3	0	1,000	1,000	100.000%
423-874	4	0	1,000	1,000	100.000%
423-874	5	0	1,000	1,000	100.000%
423-874	6	0	1,000	1,000	100.000%
423-874	7	0	1,000	1,000	100.000%
423-874	8	0	1,000	1,000	100.000%
423-874	9	0	1,000	1,000	100.000%
423-875	0	316	517	898	57.572%
423-875	1	111	877	998	87.876%
423-875	2	112	648	889	72.891%
423-875	3	360	484	921	52.552%
423-875	4	164	633	901	70.255%
423-875	5	360	470	900	52.222%
423-875	6	116	653	876	74.543%
423-875	7	0	1,000	1,000	100.000%
423-875	8	393	456	911	50.055%
423-875	9	364	480	903	53.156%
423-876	0	462	411	923	44.529%
423-876	1	660	282	960	29.375%
423-876	2	402	583	992	58.770%
423-876	3	851	102	985	10.355%
423-876	4	530	432	980	44.082%
423-876	5	863	110	984	11.179%
423-876	6	744	237	988	23.988%
423-876	7	601	251	881	28.490%
423-876	8	669	267	953	28.017%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-876	9	649	290	954	30.398%
423-877	0	369	471	889	52.981%
423-877	1	100	709	904	78.429%
423-877	2	119	682	884	77.149%
423-877	3	162	629	881	71.396%
423-877	4	134	670	893	75.028%
423-877	5	412	440	886	49.661%
423-877	6	79	680	876	77.626%
423-877	7	117	671	876	76.598%
423-877	8	191	614	896	68.527%
423-877	9	343	528	917	57.579%
423-883	8	1	1	2	50.000%
423-886	0	29	130	172	75.581%
423-886	1	141	672	857	78.413%
423-886	2	176	674	892	75.561%
423-886	3	162	662	876	75.571%
423-886	4	165	672	878	76.538%
423-886	5	134	691	877	78.791%
423-886	6	178	641	875	73.257%
423-886	7	232	606	880	68.864%
423-886	9	281	559	892	62.668%
423-892	0	275	559	866	64.550%
423-892	1	77	676	847	79.811%
423-892	2	113	659	863	76.362%
423-892	3	72	684	845	80.947%
423-892	4	83	677	842	80.404%
423-892	5	151	627	840	74.643%
423-892	6	125	650	864	75.231%
423-892	7	71	680	848	80.189%
423-892	8	275	552	850	64.941%
423-892	9	293	541	877	61.688%
423-893	0	78	704	883	79.728%
423-893	1	26	937	984	95.224%
423-893	2	0	1,000	1,000	100.000%
423-893	3	472	451	955	47.225%
423-893	4	30	719	780	92.179%
423-893	5	125	767	946	81.078%
423-893	6	83	775	943	82.185%
423-893	7	357	496	894	55.481%

Chattanooga Exchange					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
423-893	8	91	768	916	83.843%
423-893	9	467	403	892	45.179%
423-894	0	62	648	824	78.641%
423-894	1	64	659	829	79.493%
423-894	2	293	511	835	61.198%
423-894	3	301	508	842	60.333%
423-894	4	44	697	846	82.388%
423-894	5	292	504	830	60.723%
423-894	6	238	537	815	65.890%
423-894	7	129	619	843	73.428%
423-894	8	286	534	858	62.238%
423-894	9	106	638	826	77.240%
423-899	0	291	527	849	62.073%
423-899	1	289	516	840	61.429%
423-899	2	74	628	789	79.594%
423-899	3	294	509	841	60.523%
423-899	4	303	506	846	59.811%
423-899	5	287	506	827	61.185%
423-899	6	270	515	829	62.123%
423-899	7	321	489	848	57.665%
423-899	8	310	477	821	58.100%
423-899	9	286	503	832	60.457%
423-954	1	327	547	890	61.461%
423-954	2	96	407	547	74.406%
423-954	3	40	500	597	83.752%
423-954	4	0	1,000	1,000	100.000%
423-954	5	0	1,000	1,000	100.000%
423-954	6	291	689	989	69.666%
423-954	7	0	1,000	1,000	100.000%
423-954	8	414	551	989	55.713%
423-954	9	363	465	866	53.695%
Totals		123,012	331,565	482,967	68.652%