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2009 JUL 14 AM 8:47

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T.R.A. DOCKET ROOM

BY OVERNIGHT MESSENGER

July 10, 2009

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

**RE: PETITION of Frontier Communications of America, Inc.
for Expedited Review of Central Office Code Denial;**

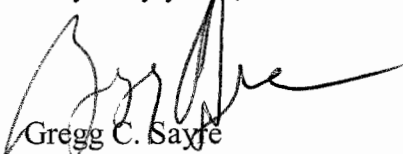
Docket No. 09-00101

Dear Ms. Dillon:

Please find enclosed for filing the original and twelve (12) copies of the above-referenced Petition by which Frontier Communications of America, Inc. requests the Authority to review and overrule the denial of the Number Pooling Administrator of Citizens' application for additional thousand number blocks to serve Livewire Telecom in Cookeville, Tennessee. Also enclosed is our \$25 check for the filing fee.

Please acknowledge receipt of this filing by date-stamping the extra copy of the transmittal letter and returning it to me in the post-paid self addressed envelope I have provided. Please call me if you have any questions. Thank you for your assistance.

Very truly yours,



Gregg C. Sayre
Assistant Secretary

GCS/hmj
Encl. (original + 12 copies; filing fee)

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

IN RE: PETITION FOR EXPEDITED)	
REVIEW OF GROWTH THOUSAND)	
BLOCKS BY THE NUMBER POOLING)	DOCKET NO. 09- _____
ADMINISTRATION RELATING TO)	
LIVEWIRE TELECOM)	

**PETITION OF FRONTIER COMMUNICATIONS OF AMERICA, INC.
FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL**

Frontier Communications of America, Inc. ("Frontier"), pursuant to rules adopted by the Federal Communications Commission for challenging determination of the Number Pooling Administrator ("Neustar"), petitions the Tennessee Regulatory Authority for an expedited review of NeuStar's denial of Frontier's application for an additional 10,000 block in the 931 area code.

1. Frontier is a competitive local exchange carrier providing telecommunications services in Tennessee under the jurisdiction of the Tennessee Regulatory Authority and is the holder of a TRA Certificate of Public Convenience and Necessity.
2. NeuStar is an independent, non-government entity that is responsible for administering and managing numbering resources in pooling areas. *See* 47 C.F.R. § 52.13 (a) and (b).
3. On March 31, 2000, the Federal Communications Commission issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104" or the "March Order"). On December 29, 2000, the FCC issued its Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200 ("FCC 00-249" or the

“December Order”). These FCC orders addressed issues and strategies relating to the efficient use of numbering resources.

4. In FCC 00-104 and FCC 00-249, the FCC announced rules and sought comments in an effort to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of the existing telephone numbers and to slow further exhaustion of existing numbers under the North American Numbering Plan.
5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring carriers to report rate center based utilization to NeuStar. The FCC further required that to qualify for access to new numbering resources, applications must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application.
6. In addition to the months-to-exhaust (“MTE”) requirement described above, the FCC’s rules also require carriers to meet a rate center utilization threshold of 60 percent to receive additional numbering resources in a given rate center. FCC 00-249 at ¶22; FCC 01-362 ¶¶50-52. The utilization threshold increases by five percent per year until it reaches a maximum 75 percent. Based on the FCC’s orders, carriers must meet both the six-month MTE requirement and the utilization threshold on a rate center basis to obtain additional number resources. *Id.* ¶29.
7. On June 26, 2009, Frontier submitted a National Pooling Request for an additional block of 10,000 DID numbers necessary to meet the telephone number needs of Livewire Telecom (*Exhibit A*). Exhibit A also includes Frontier’s MTE calculations.

8. The assignment request made on behalf of Livewire Telecom is for 10,000 consecutive additional telephone numbers in the 931 area code and Cookeville rate center. Frontier currently has numbers available in the Cookeville rate center, but these numbers do not meet the customer's needs for expansion. Livewire Telecom needs a consecutive 10,000 block because of its business plans for use of numbers, and in particular it requests assignment of 931-500 because it is conducting advertising in multiple states and desires to maintain consistency in its advertising and to provide for customer recognition of its numbers.
 9. Based on the Livewire Telecom data that was used to calculate Frontier's MTE, Frontier's numbering resources would not exhaust for several years, but the methodology used in the calculation does not take into account the customer's need for consecutive numbers in one block.
 10. Frontier is unable to fulfill the customer's needs without the assignment of a new central office code. The customer has requested the assignment of Central Office Code 500.
 11. On June 26, 2009, Frontier's request was denied on the grounds that Frontier did not meet the utilization threshold required in the Central Office Code (NXX) Guidelines. This decision is attached hereto as ***Exhibit B***.
 12. As results of the denial of Frontier's request for additional numbering resources, Frontier is unable to provide the telecommunications services requested by its customer in Tennessee.
 13. Under previous procedures used by the North American Numbering Plan Administration ("NANPA"), waivers or exceptions were typically granted in any case where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, however,
-

NeuStar looks at the MTE criteria and utilization threshold for the rate center and allows no exceptions. By refusing to consider the circumstances of each case, NeuStar's procedure may result in decisions contrary to the public interest and decisions that do not necessarily preserve the efficient use of telephone numbers or postpone dates of exhaust.

14. Frontier's inability to provide this large business customer with the requested numbers in new thousands blocks prevents Frontier from providing the quality of service this customer desires and expects. Correspondence from Livewire Telecom describing its request is attached as *Exhibit C*.
15. Attached as *Exhibit D* is a breakdown of the central office codes in the Cookeville rate center, showing the utilization percentage for each thousand number block.
16. Both the FCC Order and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. See 47 C.F.R. §52.15 (g)(4).
17. This Authority has previously received similar requests from BellSouth Telecommunications, Inc. in which BellSouth asked the Authority to overrule a decision of NANPA and NeuStar. See Docket 03-00482 and Docket 03-00591. In both cases, the Authority granted BellSouth's request. State commissions in North Carolina, Florida, and Louisiana have also granted such request from BellSouth and from US LEC. The Authority also granted previous requests by Frontier's affiliate Citizens Telecommunications of Tennessee, LLC, for central office codes to serve St. Mary's Hospital in Powell. See Docket 04-00254 and Docket 06-00257. Frontier's additional request in this case is due to the customer's provision of a new telecommunications service that will benefit consumers in general. This service will be an innovative voice mail service that

allows consumers to maintain their privacy and security when giving out telephone numbers to persons with whom they are not fully acquainted.

18. Frontier seeks the Authority's review of NeuStar's decisions to withhold numbering resources from it on the grounds that the CO Code Administration database denial (1) violates the rules and orders of the FCC which grant carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need and (2) interferes with Frontier's ability to serve its customers within Tennessee. As the FCC has stated, "Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources" FCC 00-429 at ¶61. By refusing to grant numbering resources sufficient to meet Livewire Telecom's needs, the decision is preventing the customer from obtaining the service of its choice from its carrier of choice, Frontier.

Relief Sought

For these reasons, Frontier requests that the Authority review the decision of NeuStar to deny Frontier's request for additional numbering resources and direct NeuStar to assign a new 10,000 block to meet the specific requirements of Livewire Telecom in Cookeville, Tennessee.

Respectfully submitted,

Frontier Communications of America, Inc.

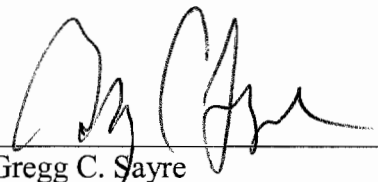
By: 
Gregg C. Sayre
Assistant Secretary

Exhibit A

Exhibit A

LIVESTOCK
OTD
931-500

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking
Number: **931-COOKEVILLE-TN-302119**

**Full NXX:
Dedicated
Customer**

Type of Application:	New	Change	Delete
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1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **FRONTIER COMM AM -TN**

Headquarters
Address: **180 S. Clinton Ave.**

City, State, Zip: Rochester, NY, 14646

Contact Name: **Stephen Bonno**

Contact Address: **180 S. Clinton Ave.**

City,State,Zip: **Rochester, NY, 14646**

Phone: **585-777-8011** FAX: **585-454-6726**
mail: **stephen bonno@frontiercorp.com**

E-

Code Administrator: ²

Name: **Michael Ortega**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5348** FAX: **571-434-5502**

1.2 NPA: 931 **NXX: 3** **LATA: 470** **OCN: 4**
866C **Parent Company's OCN(s)**
3400

Switching Identification(Switch Entity/POI) ⁵
CKVLTNXARS3

Locality/City/Wire Center:

Rate Center: ⁶
COOKEVILLE

Homing Tandem Operating Co: ⁷ Tandem Homing
FRONTIER CLI
COMMUNICATIONS ⁸ :CKVLTNXA71T

1.3 Dates: Date of
Application: **06/26/2009**

Request Effective Date: ^{9 10}
08/31/2009

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? Yes No **X**

1.4 a) Type of company/entity requesting the code: **CAP OR CLEC**
(LEC, IC, CMRS, Other)

b) Types of service: **Wireline** (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) **931-500**

d) Codes that are undesirable, if any

e) Type of change (Mark **all** that apply)

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

OCN-Inter-company ¹² Effective Date LATA Extend
Reservation

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

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 Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain):

1.8 Part 2 is attached Part 2 is not attached **X** for BIRRDS ^{14 15}
 Additional Documentation is attached Additional Documentation is not
 attached **X**

Comments:

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

Stephen Bonno

Signature of Code Applicant

**Sr.
Engineer-
Number
Planning**

Title

06/26/2009

Date

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 TelcordiaTM 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 TelcordiaTM COMMON LANGUAGE CLLITM 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 CLLITM 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 TelcordiaTM 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.

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

**Tracking
Number:** 931-
COOKEVILLE-
TN-302119
Full NXX:
Dedicated
Customer

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

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

**Company
Name:** FRONTIER COMM AM -TN

**Headquarters
Address:** 180 S. Clinton Ave.

**City, State,
Zip:** Rochester, NY, 14646

**Contact
Name:** Stephen Bonno

**Contact
Address:** 180 S. Clinton Ave.

City,State,Zip: Rochester , NY , 14646

Phone: 585- 777-8011 **FAX:** 585- 454-6726 **E-mail:** stephen_bonno@frontiercorp.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: **931** LATA: **470** OCN: ^{iv}
866C Parent Company's OCN **3400**

Number of Thousands-Blocks Requested : **10**

Switching Identification(Switch Entity/POI) : ^v

CKVLTNXARS3

City or Wire Center Name :

Rate Center: ^{vi}

COOKEVILLE

Rate Center Sub Zone:

1.3 Dates:

Date of Application: ^{vii}

06/26/2009

Requested Block Effective Date: ^{viii}

08/31/2009

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 ☒

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : **CAP OR CLEC** (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : **Wireline**

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) **931-500**

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any

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) **N/A**

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 ☒ 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 1B

OCN: 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.

Stephen Bonno

Signature of Block Applicant

**Sr. Engineer-
Number 06/26/2009
Planning**

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM 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. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

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

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

Foot Notes :

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.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **931-COOKEVILLE-TN-302119**Date: **06/26/2009**OCN:**866C**Company Name:**FRONTIER COMM AM -
TN**Rate Center: **COOKEVILLE**

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

Name of Block Applicant:**Stephen Bonno**Signature: **Stephen Bonno**Title:**Sr. Engineer-Number Planning**Telephone No.: **585-777-8011**FAX No.: **585-454-6726**E-mail: **stephen_bonno@frontiercorp.com**A. Available Numbers:**7812**B. Assigned Numbers: **188**C. Total Numbering Resources:**8000**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	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth
History -
Previous 6

0	0	0	0	0	0
---	---	---	---	---	---

months³

F. Forecast

Next 12 months ⁴	10000	0	0	0	0	0	0	0	0	0	0	0
-----------------------------	--------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **1666.667**H. Months
to Exhaust⁵
=
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

Block Requested

1

Available Numbers

7812

Months To Exhaust

4.687

I.

$$\text{Utilization}^6 = \frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \mathbf{2.35}$$

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))

Exhibit B

Exhibit BNovember 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3**Tracking Number :** 931-COOKEVILLE-
TN-302119Date of Application: 06/26/2009 Effective Date: _____
Date of Receipt: 06/26/2009 Date of Response: 06/26/2009Service Provider Name: FRONTIER COMM AM -TN
(Telcordia TM LERG TM Routing Guide) OCN: 866C

NPAC SOA SPID : _____

Pooling Administrator Contact Information:Genevieve Bettiga Phone: 925-363-7652

Signature of Pooling Administrator

Genevieve Bettiga Fax: 925-363-7683

Name (print)

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

Block Assigned: _____

Block Reserved : _____

Block Reservation
Expiration Date : _____

Block/Code Modified : _____

Block/Code
Disconnected : _____

Block Contaminated(Yes or No) : _____

If Yes, enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹ _____CKVLTNXARS3

Rate Center: _____

COOKEVILLE

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 code 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.**

Exhibit B

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 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.)

Exhibit C

Livewire Telecom

1 East Main Street Rochester, NY 14614 585-967-2635

July 6, 2009

Frontier Communications of America, Inc.

180 South Clinton Avenue

Rochester, New York 14646

Dear Sir or Madam:

Livewire Telecom is requesting 10,000 consecutive numbers in the Cookeville, TN Rate Center. We are specifically in need of NPA-NXX 931-500 for our enhanced voicemail services to provide numbering consistency throughout our markets for advertising with commercials and market recognition purposes. We acknowledge that Frontier does not have the current resources to fulfill our needs and request these resources be obtained as soon as possible.

Thank you in advance for your help.

Sincerely,

A handwritten signature in black ink, appearing to read "Tish Robinson", with a large, sweeping loop at the end.

Tish Robinson

President

Exhibit D

Exhibit D

Frontier Communications of America, Inc.-CLEC

EXHIBIT D

COOKEVILLE RATE CENTER - Utilization by NPA-NXX-X

NPA	NXX	X	Utilization
931	256	8	2.0%
931	259	8	2.0%
931	277	6	2.0%
931	337	3	2.0%
931	584	2	2.0%
931	713	2	6.0%
931	713	3	0.0%
931	788	8	2.0%
Total			2.3%