



Guy M. Hicks  
General Counsel

AT&T Tennessee  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

T: 615.214.6301  
F: 615.214.7406  
guy.hicks@att.com

October 8, 2009

**VIA HAND DELIVERY**

filed electronically in docket office on 10/08/09

Hon. Sara Kyle, 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 Clayton Homes*  
Docket No 09-00168

Dear Chairman Kyle:

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,

Guy M. Hicks

GH ch



an official of the U.S. Olympic Team

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

In Re:       *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Clayton Homes*

Docket No. \_\_\_\_\_

**PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL**

AT&T Tennessee, pursuant to rules adopted by the FCC for challenging determinations of the Number Pooling Administrator ("NeuStar"), petitions the Tennessee Regulatory Authority (the "Authority") for an expedited review of NeuStar's denial of AT&T Tennessee's application for use of central office code numbering resources in the 865 area code.

AT&T Tennessee respectfully shows the Authority as follows:

1.       AT&T Tennessee is a telecommunications company providing intraLATA, local exchange telecommunications services in the Maryville 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 ("FCC") 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 00-104 ¶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 October 8, 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 consecutive DID numbers in two 1,000 blocks necessary to meet the demands of its customer, Clayton Homes ("Clayton"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for consecutive DID numbers in two 1,000 blocks in the 865 NPA area code, in response to Clayton's request for 1,000 DID numbers in the NPA-XXX-4000 block, and 1,000 DID numbers in the NPA-NXX-6000 block. Clayton cited growth and new technology as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Maryville rate center, and, accordingly, AT&T Tennessee was unable to provide Clayton 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 Maryville rate center had an MTE of approximately 42 months.

11. Despite the fact that AT&T Tennessee's Maryville rate center may not exhaust for 42 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Clayton within the Maryville rate center. This is because the individual switch that serves this customer within the Maryville rate center does not have sufficient number resources to meet the customer's request.

12. On or about October 8, 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 Clayton is attached as Exhibit "D").

14. Relief for the 865 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 865 NPA with a Pool Start Date of March 21, 2002. According to NeuStar, based on the 2009-1 NRUF and NPA Exhaust Analysis dated April 2009, the projected exhaust date of the 865 NPA is the Second Quarter 2027. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 865 NPA.

15. Both FCC 00-104 and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory authorities have the power and authority to review

NeuStar's decision to deny a request for numbering resources. See FCC 00-104, Appendix A, Final Rules, § 52.15(g) (3) (iv) ("The carrier may challenge the NeuStar's decision to the appropriate state regulatory commission"); NeuStar Central Office Code (NXX) Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

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

17. In reviewing previous petitions of this type, the TRA Staff has requested that AT&T Tennessee provide additional information concerning number utilization for the specific central office involved in the request. This information for the Maryville, including the MAVLTNMADS0 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 Clayton 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 Clayton'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 Clayton's needs, the NeuStar is preventing Clayton 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**

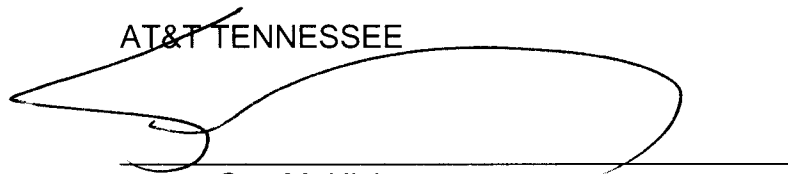
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of Clayton in order that Clayton may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, AT&T Tennessee requests:

1. The Authority review the decision of 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 Clayton in the Maryville rate center within the 865 NPA.

Respectfully submitted,

~~AT&T~~ TENNESSEE

A large, stylized handwritten signature in black ink, appearing to read 'Guy M. Hicks', is written over a horizontal line.

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



## Pooling Administration System



rena.wilkie@att.com (SP)

Sign Out

Time : 10/08/2009 01:35:44 PM EDT



Individual  
Block  
Requests

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

Printable Version

TBPAG Attachment 1 - March 19, 2007

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

Tracking  
Number:

865-  
MARYVILLE-  
TN-321724  
  
Individual  
Block  
Request

Type of

Application:



New



Change



Disconnect

### GENERAL APPLICATION INFORMATION

#### 1.1 Contact Information:

Block Applicant:

Company  
Name:

BELLSOUTH SO CNTL

Headquarters  
Address:

500 Broad St SE

City, State,  
Zip:

Gainesville, GA, 30501

Contact  
Name:

Rena Buttica

Contact  
Address:

500 Broad St SE

City,State,Zip:

Gainesville , GA , 30501

Phone: 770-  
945-9630

FAX: 770-  
945-9630

E-mail: rw0052@att.com

Pooling Administrator: <sup>ii</sup>

Contact  
Name:

Genevieve Bettiga

Contact  
Address:

1800 Sutter St

City,State,Zip:

Concord ,CA,94520

Phone:

925-363-7652 FAX: 925-363-7683

E-mail: genevieve.bettiga@neustar.biz

**1.2 General Information:**

Check one : No LRN needed X LRN needed <sup>iii</sup> \_\_\_\_\_

NPA: 865 LATA: 474 OCN: <sup>iv</sup> 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 2

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
MAVLTNMADS0

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup> MARYVILLE

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

**1.3 Dates:**

Date of Application: <sup>vii</sup> 10/08/2009

Requested Block Effective Date: <sup>viii</sup> 11/08/2009

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) 865-738-4 & 6

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) \_\_\_\_\_

**1.5 Type of Request:**

Initial block for rate center : Yes \_\_\_\_\_ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

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

Type of change(Mark all that apply)

☐ OCN:Intra-company<sup>ix</sup> ☐ Switching Id ☐ Part 1B  
☐ OCN:Inter-company<sup>x</sup> ☐ Effective Date

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

**1.6 Block Return :**

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

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

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Rena Buttica**

**Associate  
Technical  
Support  
Analyst** **10/08/2009**

**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<sup>TM</sup> LERG<sup>TM</sup> Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia<sup>TM</sup> Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI<sup>TM</sup> tandem of the facilities based provider<sup>xi</sup>. Explanations of these terms may be found in the footnotes.

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

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

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

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

#### **Foot Notes :**

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

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

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

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

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

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies,

Inc.

Question? Email us  
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## Pooling Administration System

 rena.wilkie@att.com (SP)

Sign Out

Time : 10/08/2009 01:36:00 PM EDT

Printable Version

May 16, 2008

Appendix 3

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

(Thousands-Block Number Pooling Growth Block Request)

Individual Block  
Requests

CO/NXX Code  
Requests

Withdraw Pending  
Requests

Confirm Resources In  
Service

Donate Blocks

Submit Forecast

Search Forms

Reports

User Profile

Tracking Number: **865-MARYVILLE-TN-321724**

Date: **10/08/2009**

OCN: **9419**

Company Name: **BELLSOUTH SO  
CNTL**

Rate Center: **MARYVILLE**

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  
9630**

FAX No.: **770-945-9630**

Telephone No.: **770-945-**

E-mail: **rw0052@att.com**

A. Available Numbers: **25314**

B. Assigned Numbers: **53240**

C. Total Numbering Resources: **84148**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: **0**

List  
Excluded  
Code(s)  
or  
Block(s)  
:

Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon Mon

th	th	th	th	th	th	th	th	th	th	th	th
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12

E.  
 Growth  
 History -  
 Previous **147** **276** **103** **601** **249** **338**  
 6  
 months<sup>3</sup>

F.  
 Forecast  
 - Next **286** **2286** **286** **286** **286** **286** **286** **286** **286** **286** **286** **286**  
 12  
 months<sup>4</sup>

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) **619.333**

H.  
 Months  
 to Exhaust  
<sup>5</sup> = 
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>25314</b>	<b>40.873</b>
<b>2</b>	<b>26314</b>	<b>42.488</b>

I.  
 Utilization<sup>6</sup> = 
$$\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C) - Excluded Numbers(D)}} \times 100 =$$
  
**63.269**

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

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

<sup>3</sup>Net change in TNs no longer available for assignment in each previous month, starting

with the most distant month as Month #1, and Month #6 as the current month.

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

<sup>5</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

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





















## Pooling Administration System

[Sign Out](#)

 [rena.wilkie@att.com \(SP\)](#)

Time : 10/08/2009 01:35:15 PM EDT

-   [Individual Block Requests](#)
-   [CO/NXX Code Requests](#)
-   [Withdraw Pending Requests](#)
-   [Confirm Resources In Service](#)
-   [Donate Blocks](#)
-   [Submit Forecast](#)
-   [Search Forms](#)
-   [Reports](#)
-   [User Profile](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup>

Your Utilization calculates to 63.269%. 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



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8/27/2009

Clayton Homes  
5000 Clayton Rd  
Maryville, TN 37804

Rusty Turbyfill

Manager – Voice Services  
865-380-3000 x5995  
[rusty.turbyfill@clayton.net](mailto:rusty.turbyfill@clayton.net)

To Whom It May Concern:

Clayton Homes would like to petition to add 2,000 new Direct Inward Dial (DID) numbers for growth of our business.

We currently have 1,000 DID's in place that are in the 865-380-3xxx line range. Our growth of business and new technology has pushed our limits of our current 865-380-3xxx range. At this moment we have around 50 DID available for use.

Our request would be to have the following ranges established for our use:

- A new 1,000 block in the 4000 range
- A new 1,000 block in the 6000 range

My understanding is that a new NXX would have to be established in Maryville, TN to accommodate our requested line range needs.

If there are any questions or concern about this request, please contact me directly via email or by phone.

**TENNESSEE REGULATORY AUTHORITY**



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

460 James Robertson Parkway  
Nashville, Tennessee 37243-0905

November 29, 2001

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

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

Dear Ms. Dixon:

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "K. David Waddell".

K. David Waddell  
Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-8953  
[www.state.tn.us/tra](http://www.state.tn.us/tra)

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. P-55, SUB 1268**

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

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

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

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

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

WHEREUPON, the Commission now reaches the following

**CONCLUSIONS**

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

**IT IS, THEREFORE, ORDERED as follows:**

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


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

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

ISSUED BY ORDER OF THE COMMISSION.

This the 10<sup>th</sup> day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION:



Geneva S. Thigpen, Chief Clerk

**Maryville Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
865-379	0	90	722	899	80.311%
865-379	1	173	523	824	63.471%
865-379	2	456	343	833	41.176%
865-379	3	1	799	800	99.875%
865-379	4	44	886	962	92.100%
865-379	5	73	693	859	80.675%
865-379	6	312	520	874	59.497%
865-379	7	374	427	851	50.176%
865-379	8	444	383	867	44.175%
865-379	9	480	377	888	42.455%
865-380	0	470	346	849	40.754%
865-380	1	78	741	896	82.701%
865-380	2	251	363	624	58.173%
865-380	3	0	1,000	1,000	100.000%
865-380	4	180	309	542	57.011%
865-380	5	479	410	909	45.105%
865-380	6	418	554	981	56.473%
865-380	7	715	261	982	26.578%
865-380	8	571	343	965	35.544%
865-380	9	572	294	884	33.258%
865-448	0	685	279	980	28.469%
865-448	1	717	250	973	25.694%
865-448	2	704	238	979	24.311%
865-448	3	553	395	983	40.183%
865-448	6	319	581	950	61.158%
865-448	8	687	281	984	28.557%
865-448	9	576	367	973	37.718%
865-681	0	347	433	822	52.676%
865-681	1	333	441	817	53.978%
865-681	2	372	405	826	49.031%
865-681	3	360	447	839	53.278%
865-681	4	354	417	810	51.481%
865-681	5	85	727	885	82.147%
865-681	6	353	412	820	50.244%
865-681	7	352	464	850	54.588%
865-681	8	360	426	825	51.636%
865-681	9	440	360	821	43.849%
865-977	0	264	508	819	62.027%
865-977	1	261	512	811	63.132%
865-977	2	196	800	1,000	80.000%

**Maryville Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
865-977	3	531	463	996	46.486%
865-977	4	241	340	654	51.988%
865-977	5	24	562	632	88.924%
865-977	6	296	481	817	58.874%
865-977	7	277	498	806	61.787%
865-977	8	293	495	824	60.073%
865-977	9	310	496	845	58.698%
865-980	0	459	374	864	43.287%
865-980	1	35	839	928	90.409%
865-980	2	40	773	858	90.093%
865-980	3	61	647	741	87.314%
865-980	4	0	799	800	99.875%
865-980	5	210	278	562	49.466%
865-980	6	562	276	897	30.769%
865-980	7	461	247	751	32.889%
865-980	9	507	372	909	40.924%
865-981	0	1	999	1,000	99.900%
865-981	1	117	519	713	72.791%
865-981	2	59	330	460	71.739%
865-981	3	81	752	893	84.211%
865-981	4	230	416	712	58.427%
865-981	5	201	313	546	57.326%
865-981	6	211	751	974	77.105%
865-981	7	386	474	903	52.492%
865-981	8	13	920	961	95.734%
865-981	9	293	434	831	52.226%
865-982	0	50	656	818	80.196%
865-982	1	124	629	843	74.614%
865-982	2	52	672	831	80.866%
865-982	3	73	647	806	80.273%
865-982	4	114	594	813	73.063%
865-982	5	62	636	804	79.104%
865-982	6	82	651	811	80.271%
865-982	7	100	622	821	75.761%
865-982	8	74	633	812	77.956%
865-982	9	75	636	855	74.386%
865-983	0	266	509	818	62.225%
865-983	1	82	642	827	77.630%
865-983	2	102	637	829	76.840%
865-983	3	250	544	826	65.860%

**Maryville Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
865-983	4	88	612	798	76.692%
865-983	5	91	623	818	76.161%
865-983	6	249	532	817	65.116%
865-983	7	85	610	790	77.215%
865-983	8	93	591	791	74.716%
865-983	9	263	506	809	62.546%
865-984	0	89	596	780	76.410%
865-984	1	84	589	789	74.651%
865-984	2	109	599	819	73.138%
865-984	3	261	530	836	63.397%
865-984	4	136	613	823	74.484%
865-984	5	115	601	804	74.751%
865-984	6	119	600	808	74.257%
865-984	7	120	617	805	76.646%
865-984	8	109	587	797	73.651%
865-984	9	109	589	804	73.259%
865-995	0	320	554	946	58.562%
865-995	1	399	486	951	51.104%
865-995	2	248	655	962	68.087%
865-995	9	323	557	954	58.386%

<b>TOTAL:</b>		25,314	53,240	84,148	63.269%
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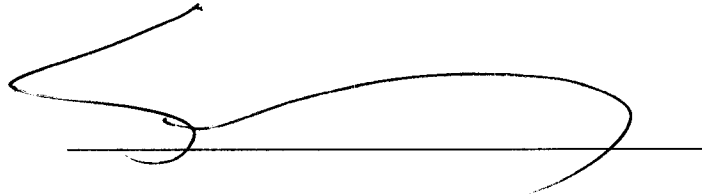


### CERTIFICATE OF SERVICE

I hereby certify that on October 8, 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 be "Beth Sprague", written over a horizontal line.