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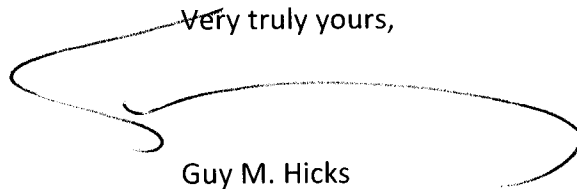
Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number Pooling
Administrator Relating to Apollo Group*
Docket No _____

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.

Very truly yours,



Guy M. Hicks

GMH: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 Apollo Group, Inc.*

Docket No. _____

PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL

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

AT&T Tennessee respectfully shows the Authority as follows:

1. AT&T Tennessee is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Franklin 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 16, 2010, 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 100 consecutive DID numbers necessary to meet the demands of its customer, Apollo Group, Inc. ("Apollo"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 100 consecutive DID numbers in the 615 NPA area code, in response to Apollo's request for 100 consecutive DID numbers not in the "0", "8" or "9" blocks. Apollo cited day-to-day operations as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Franklin rate center, and, accordingly, AT&T Tennessee was unable to provide Apollo 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 Franklin rate center had an MTE of approximately 16.5 months.

11. Despite the fact that AT&T Tennessee's Franklin rate center may not exhaust for 16.5 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Apollo within the Franklin rate center. This is because the individual switch that serves this customer within the Franklin rate center does not have sufficient number resources to meet the customer's request.

12. On or about March 16, 2010, 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 Apollo is attached as Exhibit "D").

14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2009-2 NRUF and NPA Exhaust Analysis dated October, 2009, the projected exhaust date of the 615 NPA is the Fourth Quarter 2013. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 615 NPA.

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

16. The TRA has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs. The TRA has, for example, ordered NeuStar to provide AT&T Tennessee with numbering resources to meet the service requirements of the

University of Tennessee, even though AT&T Tennessee had been unable to satisfy the required months-to-exhaust criteria. *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University of Tennessee - Chattanooga* (approved by the Directors on November 20, 2001 by a vote of 3-0) (see correspondence from TRA Executive Secretary, dated November 29, 2001, attached as Exhibit "E").

17. In reviewing previous petitions of this type, the TRA Staff has requested that AT&T Tennessee provide additional information concerning number utilization for the specific central office involved in the request. This information for the Franklin, including the FKLNTNMADSO Central Office is attached hereto as Exhibit "F."

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 Apollo 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 Apollo'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 Apollo's needs, the NeuStar is preventing Apollo 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 requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of

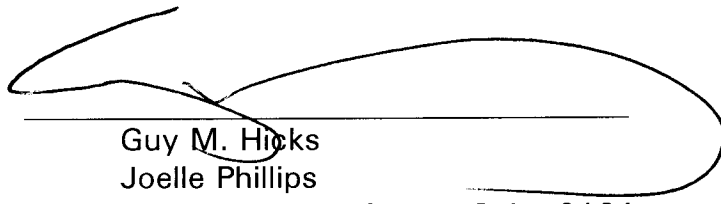
Apollo in order that Apollo may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

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 NeuStar to provide numbers to AT&T Tennessee to meet the specific requirements of Apollo in the Franklin rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE



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

Pooling Administration System		Sign Out
Time : 03/16/2010 10:14:16 AM EDT		
Printable Version TBPAAG Attachment 1 - March 19, 2007		
Thousands-Block Application Form - Part 1A		
Tracking Number: <u>615-FRANKLIN-TN-347824</u> <u>Individual Block Request</u>		
Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect		
GENERAL APPLICATION INFORMATION		
1.1 Contact Information:		
Block Applicant:		
Company Name:	<u>BELLSOUTH SO CNTL</u>	
Headquarters Address:	<u>500 Broad St SE</u>	
City, State, Zip:	<u>Gainesville, GA, 30501</u>	
Contact Name:	<u>Rena Buttica</u>	
Contact Address:	<u>500 Broad St SE</u>	
City, State, Zip:	<u>Gainesville, GA, 30501</u>	
Phone:	<u>770-945-9630</u>	FAX: <u>770-945-9630</u> E-mail: <u>rw0052@att.com</u>
Pooling Administrator:		
Contact Name:	<u>Genevieve Bettiga</u>	
Contact Address:	<u>1800 Sutter St</u>	
City, State, Zip:	<u>Concord, CA, 94520</u>	

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 ⁱⁱⁱ _____

NPA: 615 LATA: 470 OCN: ^{iv} 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
FKLNTNMADS0

City or Wire Center Name : _____

Rate Center: ^{vi} FRANKLIN

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} _____
03/16/2010

Requested Block Effective Date: ^{viii}
04/16/2010

☐ 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) BLOCK
CANNOT CONTAIN 0,8 OR 9 IN THE FIRST POSITION

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 ^{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.

Rena Buttica

Signature of Block Applicant

Associate
Technical **03/16/201**
Support **0**
Analyst

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).

☒ Select if you are the current Block Holder.

☐ Select if you are not the current Block Holder

☒ Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Question? Email us
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**E
F
B
C**

Sign Out

[illegible]

Mont Mont Mont Mont Mont Mont Mont Mont Mont Mont Mont Mont

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

E. Growth History - Previous 6 months³

	<u>70</u>	<u>281</u>	<u>732</u>	<u>382</u>	<u>329</u>	<u>1299</u>						
--	-----------	------------	------------	------------	------------	-------------	--	--	--	--	--	--

F. Forecast - Next 12 months⁴

	<u>516</u>	<u>1516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>	<u>516</u>
--	------------	-------------	------------	------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 682.667

H. Months to Exhaust⁵ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

11268

Months To Exhaust

16.506

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$ **79.443**

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))

Question? Email us
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Pooling Administration System

Sign Out

 rena.wilkie@att.com (SP)

Time : 03/16/2010 10:13:19 AM EDT

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

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

Submit

Question? Email us
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APOLLO GROUP, INC.

UNIVERSITY OF PHOENIX
INSTITUTE FOR PROFESSIONAL DEVELOPMENT
COLLEGE FOR FINANCIAL PLANNING
WESTERN INTERNATIONAL UNIVERSITY

Petition of AT&T Tennessee
Apollo Group, Inc.
Exhibit D

Apollo Group, IT Services , Provisioning
4710 E. Elwood Suite 2, Phoenix, AZ 85040
Mail Stop AA-E104
Ph:602.557.3403

AT&T

Please accept this letter of request for 100 consecutive DID numbers in the 615-790 exchange (327 Cummins St, Franklin, TN central office). The consecutive numbers are needed to work with our equipment and are necessary for day-to-day operations. In assigning the numbers, please exclude 9 in the 1st position of the NXX, example: 615 xxx-xx00-xx99. It is our intention to activate the numbers shortly after assignment.

Note, Please do not reserve Ranges with NXX beginning with "0", "8" or "9".

Desired DID Range: The preferred range would be as follows:

1300-1399;1400-1499;1500-1599; 1700-1799;1800-...

Please attempt to achieve one of these ranges if it is possible.

Best regards,


Jim Harper Sr Telecom Analyst

TENNESSEE REGULATORY AUTHORITY



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

460 James Robertson Parkway
Nashville, Tennessee 37243-0903

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 1-800-342-8339, Facsimile (615) 741-8953
www.state.nj.us/tra

Franklin Exchange

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-224	5	0	1,000	1,000	100.000%
615-224	9	155	544	789	68.948%
615-435	8	41	735	896	82.031%
615-465	5	401	598	1,000	59.800%
615-472	3	400	600	1,000	60.000%
615-472	4	0	1,000	1,000	100.000%
615-472	5	0	1,000	1,000	100.000%
615-503	1	0	1,000	1,000	100.000%
615-503	2	48	867	958	90.501%
615-503	9	206	686	931	73.684%
615-591	0	94	623	818	76.161%
615-591	1	154	566	785	72.102%
615-591	2	151	523	749	69.826%
615-591	3	136	439	655	67.023%
615-591	4	187	559	821	68.088%
615-591	5	95	639	833	76.711%
615-591	6	139	467	645	72.403%
615-591	7	209	529	814	64.988%
615-591	8	120	641	856	74.883%
615-591	9	193	532	787	67.598%
615-595	0	155	563	805	69.938%
615-595	1	117	637	811	78.545%
615-595	2	180	543	779	69.705%
615-595	3	0	1,000	1,000	100.000%
615-595	4	170	773	958	80.689%
615-595	5	127	647	821	78.806%
615-595	6	145	536	782	68.542%
615-595	7	221	513	786	65.267%
615-595	8	209	521	812	64.163%
615-595	9	207	557	820	67.927%
615-599	0	187	552	817	67.564%
615-599	1	138	588	807	72.862%
615-599	2	171	521	813	64.084%
615-599	3	207	532	791	67.257%
615-599	4	128	579	791	73.198%
615-599	5	189	521	791	65.866%
615-599	6	183	563	818	68.826%
615-599	7	264	540	845	63.905%
615-599	8	205	533	834	63.909%
615-599	9	148	497	825	60.242%
615-764	0	255	598	963	62.098%
615-764	3	86	843	938	89.872%

Franklin Exchange

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-764	4	45	825	870	94.828%
615-764	6	0	700	800	87.500%
615-764	7	0	1,000	1,000	100.000%
615-764	8	0	1,000	1,000	100.000%
615-764	9	0	1,000	1,000	100.000%
615-771	0	76	734	885	82.938%
615-771	1	49	733	888	82.545%
615-771	2	131	619	872	70.986%
615-771	3	127	658	907	72.547%
615-771	4	80	611	733	83.356%
615-771	5	66	790	924	85.498%
615-771	6	78	761	926	82.181%
615-771	7	71	732	877	83.466%
615-771	8	57	656	791	82.933%
615-771	9	77	691	871	79.334%
615-778	0	99	732	894	81.879%
615-778	1	110	528	705	74.894%
615-778	2	45	618	671	92.101%
615-778	3	121	648	787	82.338%
615-778	4	33	753	799	94.243%
615-778	5	0	700	1,000	70.000%
615-778	6	23	666	770	86.494%
615-778	7	1	993	996	99.699%
615-778	8	10	944	973	97.020%
615-778	9	122	725	919	78.890%
615-790	0	49	713	835	85.389%
615-790	1	50	690	830	83.133%
615-790	2	58	659	798	82.581%
615-790	3	79	644	817	78.825%
615-790	4	126	646	815	79.264%
615-790	5	76	801	917	87.350%
615-790	6	88	649	832	78.005%
615-790	7	75	671	827	81.137%
615-790	8	47	716	843	84.935%
615-790	9	104	675	849	79.505%
615-791	0	159	587	802	73.192%
615-791	1	48	658	836	78.708%
615-791	2	7	659	670	98.358%
615-791	3	103	357	510	70.000%
615-791	4	149	542	793	68.348%
615-791	5	148	673	878	76.651%
615-791	6	71	637	804	79.229%

Franklin Exchange

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-791	7	63	693	852	81.338%
615-791	8	128	599	809	74.042%
615-791	9	91	612	804	76.119%
615-794	0	43	692	844	81.991%
615-794	1	59	719	871	82.549%
615-794	2	66	695	851	81.669%
615-794	3	94	685	846	80.969%
615-794	4	60	711	857	82.964%
615-794	5	74	679	835	81.317%
615-794	6	50	662	824	80.340%
615-794	7	73	686	840	81.667%
615-794	8	49	728	863	84.357%
615-794	9	139	652	858	75.991%

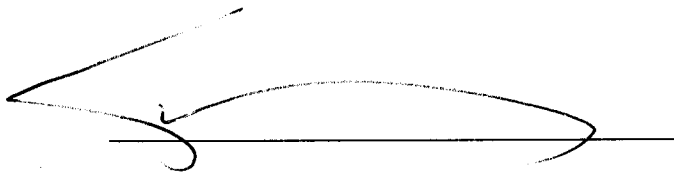
Totals: 10,268 65,312 82,212 79.443%

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2010, 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

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A handwritten signature in black ink, appearing to be "Beth Sprague", written over a horizontal line.