



Guy Hicks  
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April 7, 2010

**VIA HAND DELIVERY**

filed electronically in docket office on 04/08/10

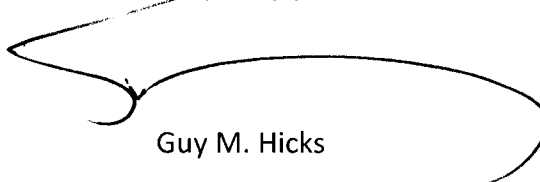
Hon. Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number Pooling  
Administrator Relating to Middle Tennessee Medical Center*  
Docket No 10-00056

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



Proud Sponsor 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 Middle Tennessee Medical Center*

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

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

BellSouth Telecommunications, Inc., dba AT&T Tennessee ("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 company providing intraLATA, local exchange telecommunications services in the Murfreesboro 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 April 6, 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 1,000 consecutive numbers necessary to meet the demands of its customer, Middle Tennessee Medical Center ("MTMC"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 1,000 consecutive numbers in the 615 NPA area code, in response to MTMC's request for 1,000 consecutive DID numbers in the "1" or "7" block. MTMC cited a new facility as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Murfreesboro rate center, and, accordingly, AT&T Tennessee was unable to provide MTMC 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 Murfreesboro rate center had an MTE of approximately 27.5 months.

11. Despite the fact that AT&T Tennessee's Murfreesboro rate center may not exhaust for 27.5 months, AT&T Tennessee is unable to provide the requested service through its switch that serves MTMC within the Murfreesboro rate center. This is because the individual switch that serves this customer within the Murfreesboro rate center does not have sufficient number resources to meet the customer's request.

12. On or about April 6, 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 MTMC 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 Murfreesboro, including the MRBOTNMADSO 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 MTMC 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 MTMC'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 MTMC's needs, the NeuStar is preventing MTMC from obtaining the service of its choice from its carrier of choice, AT&T Tennessee.

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 MTMC in the Murfreesboro 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

 MARTA.ANTELO@ATT.COM (SP)

Time : 04/06/2010 02:28:31 PM EDT

Printable Version

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

Tracking  
Number: **615-MURFREESBO-TN-351077**

**Full NXX: Pool  
Replenishment**

Type of  
Application: ☒ New ☐ Change ☐ Delete

#### 1.0 GENERAL INFORMATION

##### 1.1 Contact Information:

Code Applicant:

Company/Entity  
Name: **BELLSOUTH SO CNTL**

Headquarters  
Address: **2600 CAMINO RAMON**

City, State, Zip: **SAN RAMON ,CA ,94583**

Contact Name: **MARTA ANTELO**

Contact  
Address: **600 NW 79TH AVENUE, ROOM 336**

City,State,Zip: **MIAMI, FL, 33126**

Phone: **305-260-8213** FAX: **305-264-2918**  
mail: **MARTA.ANTELO@ATT.COM**

E-

Code Administrator:<sup>2</sup>

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: **615** NXX: <sup>3</sup> LATA: **470** OCN: <sup>4</sup> **9419**  
Parent Company's OCN(s) **9400**

Switching Identification(Switch Entity/POI) <sup>5</sup>  
**MRBOTNMADS0**

Locality/City/Wire Center:

Rate Center: <sup>6</sup>  
**MURFREESBO**

Homing Tandem Operating Co: / Tandem Homing CLLI<sup>8</sup>  
**BST** : **NSVLTNMT84T**

1.3 Dates: Date of  
Application: **04/06/2010**

Request Effective Date: <sup>9 10</sup>  
**06/11/2010**

☐ 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? Yes \_\_\_\_\_ No **X**

1.4 a) Type of company/entity requesting the code: **Incumbent Local Exchange Carrier (ILEC)** (LEC, IC, CMRS, Other)

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

Code Assignment Preference (Optional) **CUSTOMER IS REQUESTING 1000 BLOCKS FOR NPA/NXX = 615-393-1XXX**

c) **(NXX=393 IS AVAILABLE IN THE NANPA CODE AVAILABLE LIST). THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT FOR 615-393. 615-xxx-1**

d) Codes that are undesirable, if any **ALL OTHERS.**

e) Type of change (Mark all that apply)

☐ OCN-Intra-company<sup>11</sup> ☐ Switching Id ☐ Rate Center

☐ Tandem Homing CLLI

☐ OCN-Inter-company<sup>12</sup> ☐ 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: <sup>13</sup> ☒ 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 BIRDS <sup>14 15</sup>  
Additional Documentation is attached \_\_\_\_\_ Additional Documentation is not  
attached   X  

Comments:

**CUSTOMER IS REQUESTING 1000 BLOCKS FOR NPA/NXX = 615-393-1XXX  
(NXX=393 IS AVAILABLE IN THE NANPA CODE AVAILABLE LIST).  
THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT FOR  
615-393.**

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: <sup>16</sup>

**MARTA ANTELO**

**ASSOC**  
**TECH**  
**SUPPORT 04/06/2010**  
**ANLYS**  
**NTWK**

Signature of Code Applicant

Title Date

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing  
this form is available upon request from NANPA.

<sup>3</sup> The NXX field is required for any code request in which there is a change or the  
NXX is being returned.

<sup>4</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 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 Telcordia <sup>TM</sup> Routing Administration (TRA) on 732-  
699-6700.

<sup>5</sup> 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 Telcordia <sup>TM</sup> COMMON  
LANGUAGE CLLI <sup>TM</sup> 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.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone  
Network via a tandem owned by a different carrier.

<sup>8</sup> This is an eleven-character descriptor provided by the owning entity for the purpose  
of routing calls. This must be the CLLI <sup>TM</sup> Location Identification Code of the switching

entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup> 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.

<sup>10</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> 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.

<sup>14</sup> Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia<sup>TM</sup> 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.

<sup>15</sup> 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.

<sup>16</sup> An incomplete form may result in delays in processing this request.

## Pooling Administration System

Sign Out

 MARTA.ANTELO@ATT.COM (SP)

Time : 04/06/2010 02:34:29 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)

Tracking Number: **615-MURFREESBO-TN-351077**

Date: **04/06/2010**

OCN: **9419**

Company Name: **BELLSOUTH SO CNTL**

Rate Center: **MURFREESBO**

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

Name of Block Applicant: **MARTA ANTELO**

Signature: **MARTA ANTELO**

Title: **ASSOC TECH SUPPORT ANLYS NTWK**

Telephone No.: **305-260-8213**

FAX No.: **305-264-2918**

E-mail: **MARTA.ANTELO@ATT.COM**

A. Available Numbers: **23861**

B. Assigned Numbers: **64124**

C. Total Numbering Resources: **95909**

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):

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

E. Growth  
History -  
Previous 6  
months<sup>3</sup>

<u>398</u>	<u>464</u>	<u>1273</u>	<u>1190</u>	<u>464</u>	<u>371</u>
------------	------------	-------------	-------------	------------	------------

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

<u>693</u>	<u>693</u>	<u>693</u>	<u>1693</u>	<u>693</u>	<u>693</u>	<u>693</u>	<u>693</u>	<u>693</u>	<u>693</u>	<u>693</u>	<u>693</u>
------------	------------	------------	-------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 859.667

H.  
Months to  
Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>23861</b>	<b>27.756</b>

I.  
Utilization<sup>6</sup>  
=

Assigned Numbers(B) - Excluded  
Numbers(D)      X 100 = 66.859

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

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



MARTA.ANTELO@ATT.COM (SP)

Sign Out

Time : 04/06/2010 02:36:23 PM EDT

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Attachment 3

November 21, 2003

ATIS-0300066.at3

### Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 615-  
MURFREESBO-  
TN-351077

Date of Application:	<u>04/06/2010</u>	Effective Date:	<u>                    </u>
Date of Receipt:	<u>04/06/2010</u>	Date of Response:	<u>04/06/2010</u>

Service Provider Name: BELLSOUTH SO CNTL

(Telcordia <sup>TM</sup>  
LERG <sup>TM</sup> Routing  
Guide ) OCN: 9419

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.biz

NPA-NXX  
or NPA-  
NXX-X : \_\_\_\_\_

Block  
Assigned: \_\_\_\_\_

Block  
Reserved : \_\_\_\_\_

Block  
Reservation  
Expiration  
Date : \_\_\_\_\_

Block/Code  
Modified : \_\_\_\_\_

Block/Code  
Disconnected  
: \_\_\_\_\_

Block Contaminated(Yes or No) : \_\_\_\_\_

If Yes,enter the number of TNs  
contaminated : \_\_\_\_\_

Switch Identification(Switch  
Entity/POI): <sup>1</sup> \_\_\_\_\_

**MRBOTNMADS0**

Rate Center: \_\_\_\_\_

**MURFREESBO**

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

**X 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.**

Explanation:

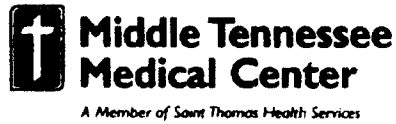


**Assignment activity suspended by the administrator.**

—  
Explanation:

**Remarks:**

—  
<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)



Petition of AT&T Tennessee  
Middle Tennessee Medical Center  
Exhibit D

March 26, 2010

Middle Tennessee Medical Center (MTMC) would like to request a block of 1000 DID numbers for their new facility at 1700 Medical Center Parkway, Murfreesboro TN 37129. This block needs to contain the following numbers: 615-XXX-7XXX or 615-XXX-1XXX. The numbers should come out of switch Murfreesboro - CLLI MRBOTNMADSO.

Michael Atlas  
IT Project Manager, MTMC

**TENNESSEE REGULATORY AUTHORITY**

Sara Kyle, Chairman  
Lynn Greer, Director  
Melvin 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 1-800-342-4359, Facsimile (615) 741-8953  
[www.state.tn.us/tra](http://www.state.tn.us/tra)

**Murfreesboro Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
615-217	0	466	375	880	42.614%
615-217	1	478	328	855	38.363%
615-217	2	434	380	856	44.393%
615-217	3	446	392	877	44.698%
615-217	4	438	381	868	43.894%
615-217	5	9	964	986	97.769%
615-217	6	391	398	836	47.608%
615-217	7	437	391	869	44.994%
615-217	8	501	364	910	40.000%
615-217	9	548	317	911	34.797%
615-396	4	0	1,000	1,000	100.000%
615-396	5	0	1,000	1,000	100.000%
615-396	6	0	1,000	1,000	100.000%
615-494	0	448	394	880	44.773%
615-494	1	136	590	848	69.575%
615-494	2	0	900	900	100.000%
615-494	3	91	570	894	63.758%
615-494	4	117	418	694	60.231%
615-494	5	461	396	898	44.098%
615-494	9	423	412	882	46.712%
615-692	3	0	1,000	1,000	100.000%
615-692	6	0	1,000	1,000	100.000%
615-692	7	0	1,000	1,000	100.000%
615-848	0	341	442	829	53.317%
615-848	1	102	549	793	69.231%
615-848	2	330	453	873	51.890%
615-848	3	328	159	511	31.115%
615-848	5	68	695	836	83.134%
615-848	6	34	862	946	91.121%
615-848	7	567	324	940	34.468%
615-848	9	67	769	904	85.066%
615-849	0	300	700	1,000	70.000%
615-849	1	334	394	850	46.353%
615-849	2	202	430	660	65.152%
615-849	3	81	701	892	78.587%
615-849	4	27	644	695	92.662%
615-849	5	424	104	560	18.571%
615-849	6	509	67	590	11.356%
615-849	7	87	346	538	64.312%
615-849	8	123	509	768	66.276%

**Murfreesboro Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
615-849	9	339	425	816	52.083%
615-867	0	410	419	879	47.668%
615-867	1	418	398	859	46.333%
615-867	2	424	380	852	44.601%
615-867	3	392	393	833	47.179%
615-867	4	378	449	866	51.848%
615-867	5	10	748	774	96.641%
615-867	6	77	696	886	78.555%
615-867	7	122	449	687	65.357%
615-867	8	77	378	599	63.105%
615-867	9	396	440	878	50.114%
615-890	0	63	594	764	77.749%
615-890	1	71	599	794	75.441%
615-890	2	66	598	778	76.864%
615-890	3	76	594	781	76.056%
615-890	4	77	582	789	73.764%
615-890	5	74	619	802	77.182%
615-890	6	68	606	794	76.322%
615-890	7	98	594	804	73.881%
615-890	8	85	592	795	74.465%
615-890	9	75	576	768	75.000%
615-893	0	74	654	816	80.147%
615-893	1	70	633	803	78.829%
615-893	2	79	612	828	73.913%
615-893	3	67	620	800	77.500%
615-893	4	73	609	805	75.652%
615-893	5	65	684	839	81.526%
615-893	6	82	626	806	77.667%
615-893	7	102	616	819	75.214%
615-893	8	57	685	833	82.233%
615-893	9	100	584	821	71.133%
615-895	0	76	595	781	76.184%
615-895	1	85	591	792	74.621%
615-895	2	137	548	792	69.192%
615-895	3	59	575	781	73.624%
615-895	4	74	625	818	76.406%
615-895	5	153	488	778	62.725%
615-895	6	101	572	794	72.040%
615-895	7	237	477	796	59.925%
615-895	8	97	578	784	73.724%

**Murfreesboro Exchange**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
615-895	9	96	582	788	73.858%
615-896	0	72	666	832	80.048%
615-896	1	79	657	828	79.348%
615-896	2	69	578	774	74.677%
615-896	3	94	570	771	73.930%
615-896	4	86	569	758	75.066%
615-896	5	80	600	786	76.336%
615-896	6	145	536	790	67.848%
615-896	7	74	566	780	72.564%
615-896	8	78	559	782	71.483%
615-896	9	173	552	818	67.482%
615-898	0	315	460	826	55.690%
615-898	1	145	554	803	68.991%
615-898	5	0	1	1	100.000%
615-898	6	257	621	879	70.648%
615-898	7	196	699	912	76.645%
615-898	8	514	343	927	37.001%
615-898	9	100	900	1,000	90.000%
615-904	0	409	376	836	44.976%
615-904	1	54	738	893	82.643%
615-904	2	96	620	853	72.685%
615-904	3	187	726	928	78.233%
615-904	6	84	684	862	79.350%
615-904	7	235	473	760	62.237%
615-904	8	52	238	344	69.186%
615-904	9	394	382	838	45.585%
615-907	0	400	428	855	50.058%
615-907	1	395	406	844	48.104%
615-907	2	371	449	867	51.788%
615-907	3	411	375	894	41.946%
615-907	4	131	554	776	71.392%
615-907	5	104	499	699	71.388%
615-907	6	140	548	804	68.159%
615-907	7	330	519	921	56.352%
615-907	8	427	403	872	46.216%
615-907	9	536	274	895	30.615%
615-962	6	200	800	1,000	80.000%
<b>Total:</b>		22,861	64,124	95,909	66.859%



**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 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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