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General Attorney - TN

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April 9, 2010

VIA HAND DELIVERY

filed electronically in docket office on 04/09/10

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 Dow Corning Corporation*
Docket No 10-00057

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 Dow Corning Corporation*

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 931 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 Clarksville 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 7, 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 2,000 consecutive DID numbers necessary to meet the demands of its customer, Dow Corning Corporation ("Dow Corning"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 2,000 consecutive DID numbers in the 931 NPA area code, in response to Dow Corning's request for 2,000 consecutive DID numbers not in the "5", "6" or "7" blocks. Dow Corning cited construction of a new plant as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Clarksville rate center, and, accordingly, AT&T Tennessee was unable to provide Dow Corning 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 Clarksville rate center had an MTE of approximately 59 months.

11. Despite the fact that AT&T Tennessee's Clarksville rate center may not exhaust for 59 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Dow Corning within the Clarksville rate center. This is because the individual switch that serves this customer within the Clarksville rate center does not have sufficient number resources to meet the customer's request.

12. On or about April 7, 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 Dow Corning is attached as Exhibit "D").

14. Relief for the 931 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 931 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 931 NPA is the Third Quarter 2024. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 931 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 Clarksville, including the CLVLTNMADS0 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 Dow Corning 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 Dow Corning'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 Dow Corning's needs, the NeuStar is preventing Dow Corning 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 Dow Corning in order that Dow Corning 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 Dow Corning in the Clarksville rate center within the 931 NPA.

Respectfully submitted,

AT&T TENNESSEE

A 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

Sign Out

 MARTA.ANTELO@ATT.COM (SP)

Time : 04/07/2010 03:59:51 PM EDT

Printable Version

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

Tracking
Number: 931-CLARKSVL-TN-351316

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:²

Name: Michael Ortega

Address: 46000 Center Oak Plaza

City,State,Zip: Sterling ,VA ,20166

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

1.2 NPA: 931 NXX: ³ LATA: 470 OCN: ⁴ 9419
Parent Company's OCN(s) 9400

Switching Identification(Switch Entity/POI) ⁵ CLVLTNMADS0

Locality/City/Wire Center:

Rate Center: ⁶
CLARKSVL

Homing Tandem Operating Co: ⁷ Tandem Homing CLLI ⁸

BST

NSVLTNWM92T

1.3 Dates: Date of
Application: **04/07/2010**

Request Effective Date: ^{9 10}
06/12/2010

☐ 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 2 BLOCKS (2000 CONSECUTIVE NUMBERS) IN NPA**

c) **931. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET THIS CRITERIA, THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT. 931-xxx-1, 931-xxx-2**

d) Codes that are undesirable, if any **BLOCKS CANNOT CONFLICT WITH 5000 THRU 7999.**

e) Type of change (Mark all that apply)

☐ OCN-Intra-company ¹¹ ☐ Switching Id ☐ Rate Center

☐ Tandem Homing CLLI

☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA ☐ Extend Reservation

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

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 Part 2 is attached _____ Part 2 is not attached X for BIRRDs ^{14 15}
Additional Documentation is attached _____ Additional Documentation is not
attached X

Comments:

**CUSTOMER IS REQUESTING 2 BLOCKS (2000 CONSECUTIVE NUMBERS) IN
NPA 931. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET
THIS CRITERIA. THEREFORE, WE ARE REQUESTING A FULL NXX FOR
REPLENISHMENT. BLOCKS CANNOT CONFLICT WITH 5000 THRU 7999.**

I hereby certify that the above information requesting an NXX code is true
and accurate to the best of my knowledge and that this application has been
prepared in accordance with Central Office Code (NXX) Assignment
Guidelines posted to the ATIS Web Site
(<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this
application: ¹⁶

MARTA ANTELO

ASSOC
TECH
SUPPORT 04/07/2010
ANLYS
NTWK

Signature of Code Applicant

Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

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

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

⁴ Operating Company Number (OCN) assignments must uniquely identify the
applicant. Relative to CO Code assignments, NECA-assigned Company Codes may
be used as OCNs. Companies with no prior CO Code or Company Code
assignments may contact NECA (973-884-8355) to be assigned a Company
Code(s). Since multiple OCNs and/or Company Codes may be associated with a
given company, companies with prior assignment should direct questions regarding
appropriate OCN usage to the TelcordiaTM Routing Administration (TRA) on 732-
699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity
for the purpose of routing calls. This is the eleven-character TelcordiaTM COMMON
LANGUAGE CLLITM Location Identification of the applicant's switch or POI.
(Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered
trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

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

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose
of routing calls. This must be the CLLITM Location Identification Code of the switching

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

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

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

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own TelcordiaTM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

Pooling Administration System

 MARTA.ANTELO@ATT.COM (SP)

Sign Out

Time : 04/07/2010 04:09:24 PM EDT

Appendix 3

Printable Version

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **931-CLARKSVL-TN-351316**

Date: **04/07/2010**

OCN: **9419**

Company Name: **BELLSOUTH SO CNTL**

Rate Center: **CLARKSVL**

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: **31782**

B. Assigned Numbers: **72347**

C. Total Numbering Resources: **111330**

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

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

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 months³

<u>373</u>	<u>259</u>	<u>329</u>	<u>-223</u>	<u>191</u>	<u>394</u>
------------	------------	------------	-------------	------------	------------

F. Forecast - Next 12 months⁴

<u>221</u>	<u>221</u>	<u>221</u>	<u>2221</u>	<u>221</u>	<u>221</u>	<u>221</u>	<u>221</u>	<u>221</u>	<u>221</u>	<u>221</u>	<u>221</u>
------------	------------	------------	-------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 554.333

H. Months to Exhaust⁵

<u>Numbers Available for Assignment to Customers(A)</u>
=

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	31782	57.334
2	32782	59.138

I. Utilization⁶ =

<u>Assigned Numbers(B) - Excluded Numbers(D)</u>	X 100 =
	<u>64.984</u>

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))

Pooling Administration System

 MARTA.ANTELO@ATT.COM (SP)

Sign Out

Time : 04/07/2010 04:10:36 PM EDT

[Printable Version](#)

Attachment 3

November 21, 2003
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number **931-CLARKSVL-TN-351316**
:

Date of Application: **04/07/2010**

Effective
Date:

Date of Receipt: 04/07/2010

Date of Response:

04/07/2010

Service Provider
Name:

BELL SOUTH SO CNTL

(Telcordia™ LERG
™ Routing Guide)

9419

OCN:

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): ¹ _____

CLVLTNMADS0

Rate Center: _____

CLARKSVL

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:

—
¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

DOW CORNING

Petition of AT&T Tennessee
Dow Corning Corporation
Exhibit D

February 24, 2010

AT&T BellSouth

Eric Popp

Subject: 2000 New DIDs in Clarksville, TN

Dear Eric Popp:

One of Dow Corning Corporation's joint venture companies, Hemlock Semiconductor LLC, is building a plant in Clarksville, TN that will produce polycrystalline silicon.

Construction at the 500 acre site in Clarksville, TN is already in progress and will continue for the next 5 years. We will need 2000 DID numbers for the site when it reaches full capacity and our technical design requires them to be in one range. The numbers cannot conflict with 5000 thru 6999 and the number 7373.

Please let us know when the 2000 DID range will be available and what the range is. Thank you.

Sincerely,

Darla C King

Darla C King

Darla.c.king@dowcorning.com

989-496-4379

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 1-800-342-8359, Facsimile (615) 741-8953
www.state.tn.us/tra

Clarksville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
931-221	0	384	462	896	51.563%
931-221	1	79	913	994	91.851%
931-221	2	0	1	1,000	0.100%
931-221	3	7	966	990	97.576%
931-221	4	233	658	929	70.829%
931-221	5	0	1,000	1,000	100.000%
931-221	6	0	1,000	1,000	100.000%
931-221	7	0	1,000	1,000	100.000%
931-221	8	810	180	995	18.090%
931-221	9	911	67	989	6.775%
931-502	0	0	1,000	1,000	100.000%
931-502	1	0	1,000	1,000	100.000%
931-502	2	0	1,000	1,000	100.000%
931-502	3	0	1,000	1,000	100.000%
931-502	4	0	1,000	1,000	100.000%
931-502	5	0	1,000	1,000	100.000%
931-503	0	453	346	849	40.754%
931-503	1	185	516	861	59.930%
931-503	2	415	316	775	40.774%
931-503	3	508	442	974	45.380%
931-503	4	0	1,000	1,000	100.000%
931-503	5	1	999	1,000	99.900%
931-503	6	0	1,000	1,000	100.000%
931-503	7	700	300	1,000	30.000%
931-503	8	39	787	908	86.674%
931-503	9	36	843	935	90.160%
931-542	0	620	257	904	28.429%
931-542	5	158	453	762	59.449%
931-542	9	216	610	911	66.959%
931-551	0	300	700	1,000	70.000%
931-551	1	0	998	998	100.000%
931-551	2	400	600	1,000	60.000%
931-551	3	391	383	832	46.034%
931-551	4	107	524	805	65.093%
931-551	7	601	311	953	32.634%
931-551	8	417	369	850	43.412%
931-551	9	413	364	848	42.925%
931-552	0	72	556	791	70.291%
931-552	1	86	553	782	70.716%
931-552	2	105	533	776	68.686%

Clarksville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
931-552	3	82	526	760	69.211%
931-552	4	88	551	797	69.134%
931-552	5	263	488	876	55.708%
931-552	6	100	545	798	68.296%
931-552	7	94	568	800	71.000%
931-552	8	261	501	853	58.734%
931-552	9	117	533	817	65.239%
931-553	0	392	394	831	47.413%
931-553	1	300	700	1,000	70.000%
931-553	2	158	657	885	74.237%
931-553	3	300	700	1,000	70.000%
931-553	4	28	838	944	88.771%
931-553	5	68	860	950	90.526%
931-553	6	36	789	932	84.657%
931-553	7	25	792	856	92.523%
931-553	8	105	522	802	65.087%
931-553	9	0	999	1,000	99.900%
931-572	0	146	732	932	78.541%
931-572	1	72	695	831	83.634%
931-572	2	0	1,000	1,000	100.000%
931-572	3	8	837	864	96.875%
931-572	4	550	450	1,000	45.000%
931-572	5	500	500	1,000	50.000%
931-572	6	500	500	1,000	50.000%
931-572	9	440	373	852	43.779%
931-645	0	420	465	945	49.206%
931-645	1	111	540	817	66.095%
931-645	2	88	587	799	73.467%
931-645	3	76	592	812	72.906%
931-645	4	75	596	813	73.309%
931-645	5	241	457	808	56.559%
931-645	6	79	592	834	70.983%
931-645	7	455	369	911	40.505%
931-645	8	106	551	803	68.618%
931-645	9	132	529	818	64.670%
931-647	0	110	588	828	71.014%
931-647	1	106	562	812	69.212%
931-647	2	101	609	831	73.285%
931-647	3	106	575	821	70.037%
931-647	4	121	543	808	67.203%

Clarksville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
931-647	5	92	567	811	69.914%
931-647	6	166	528	791	66.751%
931-647	7	91	575	800	71.875%
931-647	8	118	594	839	70.799%
931-647	9	93	564	830	67.952%
931-648	0	204	520	811	64.118%
931-648	1	91	580	806	71.960%
931-648	2	85	601	815	73.742%
931-648	3	102	590	806	73.201%
931-648	4	82	574	793	72.383%
931-648	5	233	699	962	72.661%
931-648	6	627	283	958	29.541%
931-648	7	343	486	874	55.606%
931-648	8	75	543	772	70.337%
931-648	9	91	555	798	69.549%
931-905	0	436	352	846	41.608%
931-905	1	455	332	855	38.830%
931-905	2	247	552	891	61.953%
931-905	3	600	360	960	37.500%
931-905	4	300	600	1,000	60.000%
931-905	5	311	668	1,000	66.800%
931-905	6	332	589	960	61.354%
931-905	7	14	864	899	96.107%
931-905	8	0	1,000	1,000	100.000%
931-905	9	0	999	1,000	99.900%
931-906	0	488	319	858	37.179%
931-906	1	520	312	869	35.903%
931-906	2	549	294	877	33.523%
931-906	3	698	235	942	24.947%
931-906	4	673	239	922	25.922%
931-906	5	702	226	933	24.223%
931-906	6	693	240	939	25.559%
931-906	7	521	314	881	35.641%
931-906	8	464	329	843	39.027%
931-906	9	497	304	855	35.556%
931-920	0	163	633	900	70.333%
931-920	1	163	679	858	79.138%
931-920	2	415	367	824	44.539%
931-920	3	515	267	821	32.521%
931-920	4	374	435	851	51.116%

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NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
931-920	5	483	355	879	40.387%
931-920	6	133	433	634	68.297%
931-920	7	201	654	885	73.898%
931-920	8	502	303	858	35.315%
931-920	9	233	622	877	70.924%
Total:		29,782	72,347	111,330	64.984%

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 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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