

Jeanne W. Stockman  
Counsel



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Wake Forest, NC 27587  
Tel: 919.554.7621

May 11, 2010

filed electronically in docket office on 05/11/10

Docket No. 10-00091

Chairman Sara Kyle  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: United Telephone Southeast LLC d/b/a CenturyLink's Petition for Expedited  
Review of Central Office Code Denial

Dear Chairman Kyle:

Please find enclosed an original and four (4) copies of United Telephone Southeast LLC d/b/a CenturyLink's Petition for Expedited Review of Central Office Code Denial. Also enclosed is a check in the amount of \$25.00 to cover the filing fee.

An extra copy of this letter is enclosed. Please date stamp it and return to me in the enclosed self-addressed stamped envelope. Finally, please do not hesitate to contact me at (919) 554-7621 if you have any questions concerning this petition.

Very truly yours,



Jeanne W. Stockman

Enclosures

cc: Pamela Wescott

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY

In Re:	)	
	)	
Petition for Expedited Review of Growth Code	)	Docket No. _____
Denial by the Number Pooling Administrator	)	
Relating to Wellmont Health Systems	)	

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Petition for Expedited Review of Central Office Code Denial

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United Telephone Southeast LLC d/b/a CenturyLink ("CenturyLink"), 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 CenturyLink's application for use of central office code numbering resources in the 423 area code.

CenturyLink respectfully shows the Authority as follows:

1. CenturyLink is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Kingsport Rate Center.
2. NeuStar is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). *See* 47 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. Various interested parties sought reconsideration of the above-described MTE rule before the FCC on several different 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 22, 2010, CenturyLink 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 a 1K block necessary to meet the demands of its customer, Wellmont Health Systems. The request and worksheet are attached hereto as Exhibit "A."

8. The code assignment request was for Kingsport in the 423 NPA area code, in response to Wellmont Health Systems' request for 350 numbers in a single exchange to be integrated into its existing dialing plan. Wellmont Health Systems cited growth as its basis for this request. However, CenturyLink did not have sufficient number resources available within its inventory in the Kingsport Rate Center, and, accordingly, CenturyLink was unable to provide Wellmont Health Systems with sufficient numbers to meet its needs. Wellmont Health Systems' request for these numbering resources is attached as Exhibit "B." For this reason, CenturyLink sought the numbering resources as noted above.

9. CenturyLink 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 Kingsport rate center had an MTE of approximately 227,820 months.

11. Despite the fact that CenturyLink's Kingsport rate center may not exhaust for 227,280 months, CenturyLink is unable to provide the requested service through its switch that serves Wellmont Health Systems within the Kingsport rate center. This is because the individual switch that serves this customer within the Kingsport rate center does not have sufficient number resources to meet the customer's request.

12. On or about April 22, 2010, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that CenturyLink 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 CenturyLink 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. CenturyLink's inability to provide this large business customer with the requested numbers prevents CenturyLink from providing the quality of service this customer desires and expects.

14. Relief for the 423 NPA was implemented with the start of mandatory dialing on February 26, 1996. The Authority also ordered thousands-block pooling for the 423 NPA with a Pool Start Date of September 16, 2002. According to NeuStar, based on the 2006 and NPA Exhaust Analysis – April 30, 2006, the projected exhaust date of the 423 NPA is the third quarter of 2015. Therefore, granting CenturyLink's request for numbering resources would not materially impact exhaustion of available numbers in the 423 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 ordered NeuStar to provide numbering resources to meet customer service requirements.

17. In reviewing previous petitions, the TRA Staff has requested that petitioning carriers provide additional information concerning number utilization for the specific central office involved in the request. This information for the Kingsport rate center, including the Kingsport Central Office is attached hereto as Exhibit "D."

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. CenturyLink believes that the Authority can more quickly address the numbering problem facing Wellmont Health Systems and CenturyLink, and, because time is of the essence to the customer, CenturyLink 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 CenturyLink to meet Wellmont Health Systems' 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 Wellmont Health Systems' needs, NeuStar is preventing Wellmont Health Systems from obtaining the service of its choice from its carrier of choice, CenturyLink.

20. Notwithstanding customer need for a specific numbering arrangement, CenturyLink's analysis indicates that CenturyLink 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 CenturyLink's inability to respond to its customer's needs for specific numbering resources.

### **CONCLUSION**

For the reasons articulated above, CenturyLink respectfully urges the Authority to direct the NeuStar to provide the requested numbers to CenturyLink to enable CenturyLink to meet the specific requirements of Wellmont Health Systems in order that Wellmont Health Systems may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, CenturyLink requests:

1. The Authority review the decision of the NeuStar to deny CenturyLink's request for additional numbering resources; and

2. The Authority directs NeuStar to provide numbers to CenturyLink to meet the specific requirements of Wellmont Health Systems in the Kingsport rate center within the 423 NPA.

Respectfully submitted,



Jeanne W. Stockman  
United Telephone Southeast LLC d/b/a  
CenturyLink  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900  
Telephone: 919-554-7621  
Fax: 919-554-7913  
[Jeanne.W.Stockman@CenturyLink.com](mailto:Jeanne.W.Stockman@CenturyLink.com)

Dated: May 11, 2010

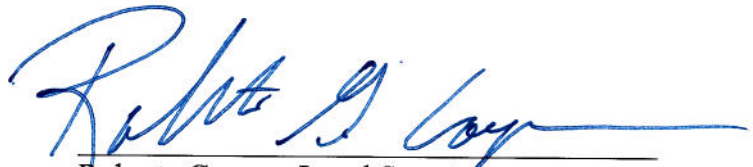


**CERTIFICATE OF SERVICE**











I hereby certify that on May 11<sup>th</sup>, 2010, a copy of the foregoing document was served on the parties of record, via the method indicated:

Ms. Beth Sprague, Regional Director  
NANPA Code Administration  
46000 Center Oak Plaza  
Sterling, VA 20166

- ☐ Hand
- ☐ U.S. Mail
- ☐ Facsimile
- ☒ Overnight Mail
- ☐ Electronic Mail

  
\_\_\_\_\_  
Roberta Cooper, Legal Secretary

**From:** Lorentz-Wiese, Shannon  
**Sent:** Friday, April 30, 2010 2:34 PM  
**To:** Roach, Cheryl  
**Subject:** Emailing: view forms.htm

Pooling Administration System	
 <a href="#">shannon.wiese@centurytel.com (SP)</a>	<a href="#">Sign Out</a>
Time : 04/30/2010 03:33:22 PM EDT	
 Individual Block Requests	<a href="#">Printable Version</a>
 CO/NXX Code Requests	TBPAG Attachment 1 - March 19, 2007
 Withdraw Pending Requests	
 Confirm Resources In Service	<b>Thousands-Block Application Form - Part 1A</b>
 Donate Blocks	<b>Tracking Number:</b> <b>423-KINGSPORT-TN-354607</b>
 Submit Forecast	<b>Individual Block Request</b>
 Search Forms	<b>Type of Application:</b> <input type="radio"/> New <input checked="" type="radio"/> Change <input type="radio"/> Disconnect
 Reports	
 User Profile	
<b><u>GENERAL APPLICATION INFORMATION</u></b>	
<b>1.1 Contact Information:</b>	
<b>Block Applicant:</b>	
Company Name:	<b>UNITED TEL - SE - TN</b>
Headquarters Address:	<b>100 Centurylink Drive</b>
City, State, Zip:	<b>Monroe, LA, 71203</b>
Contact Name:	<b>Shannon Wiese</b>
Contact Address:	<b>333 North Front Street</b>
City, State, Zip:	<b>La Crosse , WI , 54601</b>
Phone: <b>608-796-5116</b> - <b>5116</b>	FAX: <b>608-796-7990</b> E-mail: <a href="mailto:shannon.wiese@centurylink.com">shannon.wiese@centurylink.com</a>
<b>Pooling Administrator:</b> <sup>ii</sup>	
Contact Name:	<b>Genevieve Bettiga</b>
Contact Address:	<b>1800 Sutter St</b>
City, State, Zip:	<b>Concord ,CA,94520</b>
Phone:	<b>925-363-7652</b> FAX: <b>925-363-7683</b>
E-mail:	<a href="mailto:genevieve.bettiga@neustar.biz">genevieve.bettiga@neustar.biz</a>
<b>1.2 General Information:</b>	

**EXHIBIT A**

Check one : No LRN needed ☒ LRN needed <sup>iii</sup> ☐

NPA: 423 LATA: 956 OCN: <sup>iv</sup> 4510 Parent Company's OCN 0661

Number of Thousands-Blocks Requested : 1

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

City or Wire Center Name : \_\_\_\_\_  
kingsport

Rate Center: <sup>vi</sup> KINGSPORT

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

### 1.3 Dates:

Date of Application: <sup>vii</sup> \_\_\_\_\_  
04/22/2010

Requested Block Effective Date: <sup>viii</sup> \_\_\_\_\_  
05/23/2010

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 ☒

### 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) \_\_\_\_\_  
customer needs numbers in the 2 or 7 block so 423-408-2 or 423-408-7 would be great

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 ☒ If Yes , attach months to exhaust worksheet

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

Type of change(Mark all that apply)

OCN:Intra-company <sup>ix</sup> \_\_\_\_\_ Switching Id \_\_\_\_\_ Part 1B

OCN:Inter-company <sup>x</sup> \_\_\_\_\_ Effective Date \_\_\_\_\_

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

### 1.6 Block Return :



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

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

Remarks:

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

**Shannon Wiese**

**Signature of Block Applicant**

**Area Supervisor 04/22/2010**

**Title Date**

**Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>x1</sup>. Explanations of these terms may be found in the footnotes.

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

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

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

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a



response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Foot Notes :**

- <sup>i</sup> Identify the type of change(s) in Section 1.5.
- <sup>ii</sup> The Pool Administrator is available to assist in completing these forms.
- <sup>iii</sup> A CO Code application will also need to be submitted to the PA.
- <sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- <sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.
- <sup>vi</sup> Rate Center name must be a tariffed Rate Center.
- <sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- <sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- <sup>ix</sup> Select if you are the current Block Holder.
- <sup>x</sup> Select if you are not the current Block Holder
- <sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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**From:** Lorentz-Wiese, Shannon  
**Sent:** Friday, April 30, 2010 2:33 PM  
**To:** Roach, Cheryl  
**Subject:** Emailing: view forms.htm

<b>Pooling Administration System</b>																																						
<a href="#">shannon.wiese@centurytel.com (SP)</a>										<a href="#">Sign Out</a>																												
Time : 04/30/2010 03:32:28 PM EDT																																						
<div style="margin-bottom: 5px;"> Individual Block Requests</div> <div style="margin-bottom: 5px;"> CO/NXX Code Requests</div> <div style="margin-bottom: 5px;"> Withdraw Pending Requests</div> <div style="margin-bottom: 5px;"> Confirm Resources In Service</div> <div style="margin-bottom: 5px;"> Donate Blocks</div> <div style="margin-bottom: 5px;"> Submit Forecast</div> <div style="margin-bottom: 5px;"> Search Forms</div> <div style="margin-bottom: 5px;"> Reports</div> <div> User Profile</div>	<div style="text-align: right; font-size: small;"> <a href="#">Printable Version</a>  <a href="#">May 16, 2008</a> </div> <div style="margin-top: 10px;"> <b>Appendix 3</b>  <b>MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup></b>                      (Thousands-Block Number Pooling Growth Block Request)                 </div> <div style="margin-top: 10px;"> <b>Tracking Number:</b> <u>423-KINGSPORT-TN-354607</u>  <b>Date:</b> <u>04/22/2010</u>      <b>OCN:</b> <u>4510</u>      <b>Company Name:</b> <u>UNITED TEL - SE - TN</u>   <b>Rate Center:</b> <u>KINGSPORT</u>   <b>List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):</b> <u>423-224, 229, 230, 245, 246, 247, 288, 343, 378,392, 578, 857</u>   <b>Name of Block Applicant:</b> <u>Shannon Wiese</u>      <b>Signature:</b> <u>Shannon Wiese</u>   <b>Title:</b> <u>Area Supervisor</u>      <b>Telephone No.:</b> <u>608-796-51165116</u>      <b>FAX No.:</b> <u>608-796-7990</u>   <b>E-mail:</b> <u>shannon.wiese@centurylink.com</u>   <div style="margin-top: 20px;"> <b>A. Available Numbers:</b> <u>38046</u>   <b>B. Assigned Numbers:</b> <u>71954</u>   <b>C. Total Numbering Resources:</b> <u>110000</u>   <b>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>:</b> <u>0</u>   <div style="margin-top: 10px;"> <b>List Excluded Code(s) or Block(s):</b>   <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;"></th> <th style="width: 10%;">Month #1</th> <th style="width: 10%;">Month #2</th> <th style="width: 10%;">Month #3</th> <th style="width: 10%;">Month #4</th> <th style="width: 10%;">Month #5</th> <th style="width: 10%;">Month #6</th> <th style="width: 10%;">Month #7</th> <th style="width: 10%;">Month #8</th> <th style="width: 10%;">Month #9</th> <th style="width: 10%;">Month #10</th> <th style="width: 10%;">Month #11</th> <th style="width: 10%;">Month #12</th> </tr> </thead> <tbody> <tr> <td><b>E. Growth History - Previous 6 months<sup>3</sup></b></td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> </div> </div> </div>													Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	<b>E. Growth History - Previous 6 months<sup>3</sup></b>	0	0	0	0	0	0						
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12																										
<b>E. Growth History - Previous 6 months<sup>3</sup></b>	0	0	0	0	0	0																																

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

1	0	0	0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---	---	---	---

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **0.167**

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

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

38046

Months To Exhaust

227820.359

I.  
Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers(D) X 100 =  
= **65.413**

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))

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**Date:** April 25<sup>th</sup>, 2010  
**From:** Steve McClellan  
**Subj:** Request for 350 DID numbers



**To:** Public Service Commission

As requested we submit the following information associated with our request for 350 DID numbers in a single exchange.

a. Wellmont Health System, Steve McClellan, Senior Telecom Manager, 423-230-8352.

b. A detailed explanation regarding why the specific number ranges are needed.

Due to expansion at Wellmont's Holston Valley Medical Center we need to add a new range of additional (new) 350 DID numbers. Currently, our DID numbers are on the 224 exchange. Since we are adding DID numbers we would like to minimize the number of exchanges at this hospital. Currently we have 423-224-3000 thru 3799 DID, 423-224-4000 thru 6999 DID and 423 224-4000 DID Trunk Equipment.

Handling of our incoming calls would be clearer and quicker, by having all of our DID numbers in one exchange. However we learned there are no available DID number in the 224 exchange that we can use. Since we currently do 4 digit dialing within Holston Valley Medical Center, the new DID numbers can only be a block of 423-xxx-39XX, 423-xxx-2100-2999, or 423-xxx-7000-7999.

c. The total number of telephone numbers currently in service and the date the new numbers will be activated if the numbering request is approved.

Currently we have 3800 DID telephone numbers at our WHS, Holston Valley Medical Center location. We have 423-224-3000 thru 3799 DID, 423-224-4000 thru 6999 DID and 423 224-4000 DID Trunk Equipment.

d. The total number of telephone numbers which will be activated [when].

- We need the additional DID number for growth.
- The DID will be placed in service as soon as received.

e. If the customer is moving, what will be done with the current numbers after appropriate aging (i.e. will the old numbers be returned to the provider)?

- All numbers in use will be kept




f. The anticipated expenses and/or problems that the business may incur if the numbering request is denied.

1. This could force WHS to change our current dialing plan which could cost \$100,000 plus dollars and possible downtime that would impact our patients and staff.
2. Possibility of new system or equipment, could run into the thousands.
3. Affect health services and expansion projects within WHS

g. Clarification of any unusual issues related to their request.

None.

  
\_\_\_\_\_  
Senior Telecom Manager

4/27/10  
\_\_\_\_\_  
Date

**From:** Lorentz-Wiese, Shannon  
**Sent:** Friday, April 30, 2010 2:35 PM  
**To:** Roach, Cheryl  
**Subject:** FW: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 423-KINGSPORT-TN-354607

Shannon M. Wiese  
CenturyLink  
Plant Facilities Area Supervisor  
608.796.5116

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**From:** genevieve.bettiga@neustar.biz [mailto:genevieve.bettiga@neustar.biz]  
**Sent:** Thursday, April 22, 2010 3:46 PM  
**To:** Lorentz-Wiese, Shannon  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 423-KINGSPORT-TN-354607



## Pooling Administration System

Dated 22 April 2010

November 21, 2003  
ATIS-0300066.at3

Attachment 3

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

**Tracking Number :** 423-KINGSPORT-TN-354607

**Date of Application:** 04/22/2010 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 04/22/2010 **Date of Response:** 04/22/2010

**Service Provider Name:** UNITED TEL - SE - TN  
(Telcordia™ LERG™  
Routing Guide ) OCN: 4510

**NPAC SOA SPID :** \_\_\_\_\_

#### Pooling Administrator Contact Information:

**Genevieve Bettiga** Phone: 925-363-7652  
Signature of Pooling Administrator  
**Genevieve Bettiga** Fax: 925-363-7683

**EXHIBIT C**

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>		<u>kgpttnxadso</u>	
Rate Center:		<u>KINGSPORT</u>	
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 block 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:

\_\_\_\_\_

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<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.)



Numbering Resource Utilization For Each 1K Block											
NPA-NXX	X	Rate Center Abbreviation	Assigned	Intermediate	Reserved	Aging	Admin	Donated to Pool?	Notes/ Assignee	Available	Utilization
423-224		0 KINGSPORT	926	0	0	0	0			74	92.60%
423-224		1 KINGSPORT	449	0	0	0	0			551	44.90%
423-224		2 KINGSPORT	655	0	0	0	0			345	65.50%
423-224		3 KINGSPORT	895	0	0	0	1			104	89.50%
423-224		4 KINGSPORT	1000	0	0	0	0			0	100.00%
423-224		5 KINGSPORT	988	0	0	0	0			12	98.80%
423-224		6 KINGSPORT	1000	0	0	0	0			0	100.00%
423-224		7 KINGSPORT	944	0	0	0	0			56	94.40%
423-224		8 KINGSPORT	1000	0	0	0	0			0	100.00%
423-224		9 KINGSPORT	963	0	0	0	0			37	96.30%
423-229		0 KINGSPORT	900	0	0	0	0			100	90.00%
423-229		1 KINGSPORT	933	0	0	0	0			67	93.30%
423-229		2 KINGSPORT	919	0	0	0	0			81	91.90%
423-229		3 KINGSPORT	929	0	0	0	0			71	92.90%
423-229		4 KINGSPORT	897	0	0	0	0			103	89.70%
423-229		5 KINGSPORT	895	0	0	0	0			105	89.50%
423-229		6 KINGSPORT	895	0	0	0	0			105	89.50%
423-229		7 KINGSPORT	913	0	0	0	0			87	91.30%
423-229		8 KINGSPORT	924	0	0	0	0			76	92.40%
423-229		9 KINGSPORT	219	0	0	0	0			781	21.90%
423-230		0 KINGSPORT	389	0	0	194	0			417	38.90%
423-230		1 KINGSPORT	766	0	0	5	0			229	76.60%
423-230		2 KINGSPORT	598	0	0	0	0			402	59.80%
423-230		3 KINGSPORT	904	0	0	0	0			96	90.40%
423-230		4 KINGSPORT	487	0	0	112	0			401	48.70%
423-230		5 KINGSPORT	758	0	0	71	0			171	75.80%
423-230		6 KINGSPORT	775	0	0	51	0			174	77.50%
423-230		7 KINGSPORT	1000	0	0	0	0			0	100.00%
423-230		8 KINGSPORT	945	0	0	7	0			48	94.50%
423-230		9 KINGSPORT	804	0	0	0	1			195	80.40%
423-245		0 KINGSPORT	500	0	0	159	0			341	50.00%
423-245		1 KINGSPORT	925	0	0	16	0			59	92.50%
423-245		2 KINGSPORT	742	0	0	80	0			178	74.20%
423-245		3 KINGSPORT	697	0	0	75	0			228	69.70%
423-245		4 KINGSPORT	728	0	0	75	0			197	72.80%
423-245		5 KINGSPORT	857	0	0	47	0			96	85.70%
423-245		6 KINGSPORT	678	0	0	98	0			224	67.80%
423-245		7 KINGSPORT	697	0	0	89	0			214	69.70%
423-245		8 KINGSPORT	679	0	0	89	0			232	67.90%
423-245		9 KINGSPORT	495	0	0	157	0			348	49.50%
423-246		0 KINGSPORT	650	0	0	67	0			283	65.00%
423-246		1 KINGSPORT	720	0	0	85	0			195	72.00%
423-246		2 KINGSPORT	544	0	0	151	0			305	54.40%

Numbering Resource Utilization For Each 1K Block											
NPA-NXX	X	Rate Center Abbreviation	Assigned	Intermediate	Reserved	Aging	Admin	Donated to Pool?	Notes/ Assignee	Available	Utilization
423-246		3 KINGSPORT	578	0	0	148	0			274	57.80%
423-246		4 KINGSPORT	723	0	0	81	0			196	72.30%
423-246		5 KINGSPORT	435	0	0	183	0			382	43.50%
423-246		6 KINGSPORT	716	0	0	86	0			198	71.60%
423-246		7 KINGSPORT	710	0	0	84	0			206	71.00%
423-246		8 KINGSPORT	704	0	0	105	0			191	70.40%
423-246		9 KINGSPORT	485	0	0	153	0			362	48.50%
423-247		0 KINGSPORT	679	0	0	63	0			258	67.90%
423-247		1 KINGSPORT	588	0	0	116	0			296	58.80%
423-247		2 KINGSPORT	574	0	0	121	1			304	57.40%
423-247		3 KINGSPORT	533	0	0	154	0			313	53.30%
423-247		4 KINGSPORT	518	0	0	149	0			333	51.80%
423-247		5 KINGSPORT	554	0	0	133	0			313	55.40%
423-247		6 KINGSPORT	517	0	0	162	0			321	51.70%
423-247		7 KINGSPORT	513	0	0	141	0			346	51.30%
423-247		8 KINGSPORT	497	0	0	139	0			364	49.70%
423-247		9 KINGSPORT	510	0	0	158	0			332	51.00%
423-288		0 KINGSPORT	157	0	0	144	0			699	15.70%
423-288		1 KINGSPORT	343	0	0	80	0			577	34.30%
423-288		2 KINGSPORT	691	0	0	101	1			207	69.10%
423-288		3 KINGSPORT	677	0	0	121	0			202	67.70%
423-288		4 KINGSPORT	687	0	0	98	0			215	68.70%
423-288		5 KINGSPORT	686	0	0	101	0			213	68.60%
423-288		6 KINGSPORT	677	0	0	109	0			214	67.70%
423-288		7 KINGSPORT	637	0	0	122	0			241	63.70%
423-288		8 KINGSPORT	437	0	0	204	0			359	43.70%
423-288		9 KINGSPORT	380	0	0	194	0			426	38.00%
423-378		0 KINGSPORT	478	0	0	98	0			424	47.80%
423-378		1 KINGSPORT	560	0	0	57	0			383	56.00%
423-378		2 KINGSPORT	639	0	0	0	0			361	63.90%
423-378		3 KINGSPORT	482	0	0	172	0			346	48.20%
423-378		4 KINGSPORT	518	0	0	167	0			315	51.80%
423-378		5 KINGSPORT	547	0	0	144	0			309	54.70%

Numbering Resource Utilization For Each 1K Block											
NPA-NXX	X	Rate Center Abbreviation	Assigned	Intermediate	Reserved	Aging	Admin	Donated to Pool?	Notes/ Assignee	Available	Utilization
423-378		6 KINGSPORT	165	0	0	0	0			835	16.50%
423-378		7 KINGSPORT	828	0	0	0	0			172	82.80%
423-378		8 KINGSPORT	882	0	0	8	0			110	88.20%
423-378		9 KINGSPORT	296	0	0	0	0			704	29.60%
423-392		0 KINGSPORT	279	0	0	187	0			534	27.90%
423-392		1 KINGSPORT	296	0	0	323	0			381	29.60%
423-392		2 KINGSPORT	833	0	0	16	0			151	83.30%
423-392		3 KINGSPORT	755	0	0	0	0			245	75.50%
423-392		4 KINGSPORT	424	0	0	187	0			389	42.40%
423-392		5 KINGSPORT	508	0	0	0	0			492	50.80%
423-392		6 KINGSPORT	401	0	0	1	0			598	40.10%
423-392		7 KINGSPORT	343	0	0	1	0			656	34.30%
423-392		8 KINGSPORT	284	0	0	0	0			716	28.40%
423-392		9 KINGSPORT	484	0	0	177	0			339	48.40%
423-578		1 KINGSPORT	394	0	0	20	0			586	39.40%
423-578		2 KINGSPORT	835	0	0	5	0			160	83.50%
423-578		3 KINGSPORT	601	0	0	56	0			343	60.10%
423-578		5 KINGSPORT	1000	0	0	0	0			0	100.00%
423-578		6 KINGSPORT	974	0	0	9	0			17	97.40%
423-578		8 KINGSPORT	949	0	0	17	0			34	94.90%
423-578		9 KINGSPORT	0	0	0	0	0			1000	0.00%
423-857		0 KINGSPORT	2	0	0	0	0			998	0.20%
423-857		1 KINGSPORT	861	0	0	0	0			139	86.10%
423-857		2 KINGSPORT	968	0	0	0	0			32	96.80%
423-857		3 KINGSPORT	1000	0	0	0	0			0	100.00%
423-857		4 KINGSPORT	1000	0	0	0	0			0	100.00%
423-857		5 KINGSPORT	1000	0	0	0	0			0	100.00%
423-857		6 KINGSPORT	1000	0	0	0	0			0	100.00%
423-857		7 KINGSPORT	1000	0	0	0	0			0	100.00%
423-857		8 KINGSPORT	923	0	0	0	0			77	92.30%
423-857		9 KINGSPORT	0	0	0	0	0			1000	0.00%