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gh1402@att.com

January 18, 2011

VIA HAND DELIVERY

filed electronically in docket office on 01/18/11

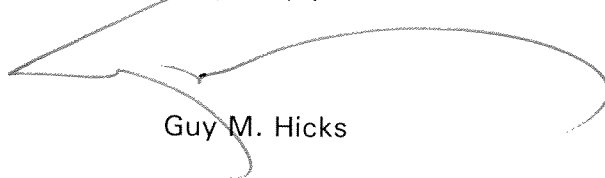
Hon. Mary Freeman, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number
Pooling Administrator Relating to Tennessee Air National Guard*
Docket No 11-00009

Dear Chairman Freeman:

Enclosed are the original and four copies of AT&T Tennessee's *Petition for Expedited Review of Central Office Code Denial*. Copies of the enclosed are being provided to counsel for the Number Pooling Administrator.

Very truly yours,



Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Tennessee Air National Guard*

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 865 area code.

AT&T Tennessee respectfully shows the Authority as follows:

1. AT&T Tennessee is a telecommunications company providing intraLATA, local exchange telecommunications services in the Maryville Rate Center.
2. NeuStar is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See C.F.R. § 52.13(a), (b).

3. On March 31, 2000, the Federal Communications Commission 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 January 12, 2011, 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 new NXX code and 3,000 numbers necessary to meet the demands of its customer, Tennessee Air National Guard ("TN ANG"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for new NXX code and 3,000 numbers in the 865 NPA area code, in response to TN ANG's request for a new NXX code (260) and 3,000 numbers in the 3, 4 and 5 blocks. TN ANG cited a new telecommunications system as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the

Maryville rate center, and, accordingly, AT&T Tennessee was unable to provide TN ANG with sufficient numbers to meet its needs. For this reason, AT&T Tennessee sought the numbering resources as noted above.

9. AT&T Tennessee completed the applications in accordance with NeuStar's Central Office Code (NXX) Assignment Guidelines and completed the necessary Months to Exhaust Certification Worksheet required by NeuStar.

10. At the time of the code request, the Maryville rate center had an MTE of approximately 17 months.

11. Despite the fact that AT&T Tennessee's Maryville rate center may not exhaust for 17 months, AT&T Tennessee is unable to provide the requested service through its switch that serves TN ANG within the Maryville rate center. This is because the individual switch that serves this customer within the Maryville rate center does not have sufficient number resources to meet the customer's request.

12. On or about January 12, 2011, 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 customer with the requested numbers prevents AT&T Tennessee from providing the quality of service

this customer desires and expects. (Correspondence from TN ANG is attached as Exhibit "D").

14. Relief for the 865 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 865 NPA with a Pool Start Date of August 21, 2002. According to NeuStar, based on the 2010-2 NRUF and NPA Exhaust Analysis dated October 2010, the projected exhaust date of the 865 NPA is the 4Q 2028. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 865 NPA.

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

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

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

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

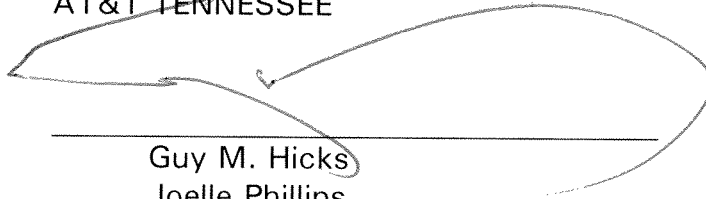
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of TN ANG in order that TN ANG may receive the service of its choice from the provider of 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 TN ANG in the Maryville rate center within the 865 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized and loops around the text.

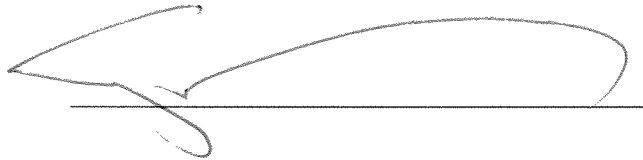
Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6311

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2011, a copy of the foregoing document was served on the parties of record, via the method indicated:

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

Ms. Beth Sprague
NeuStar/NANPA
46000 Center Oak Place
Sterling, VA 20166
Beth.sprague@neustar.biz

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








Pooling Administration System

 MARTA.ANTELO@ATT.COM (SP)

[Sign Out](#)

Time : 01/12/2011 12:24:27 PM EST

[Printable Version](#)

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

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

Tracking Number: **865-MARYVILLE-TN-409323**

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

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**

NXX: ³ **865** LATA: **474** OCN: ⁴
1.2 NPA: **9419** Parent Company's
OCN(s) **9400**

Switching Identification(Switch Entity/POI) ⁵
MAVLTNMADS0

Locality/City/Wire Center:

Rate Center: ⁶
MARYVILLE

Homing Tandem Operating Co: ⁷ Tandem Homing

BST

CLLI⁸
:KNVLTNWH93T

1.3 Dates: Date of
Application: 01/12/2011

Request Effective Date: ^{9 10}
03/19/2011 -

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) REQUESTING
A FULL NXX FOR REPLENISHMENT FOR CUSTOMER'S

c) REQUEST FOR 3 BLOCKS (3000 CONSECUTIVE NUMBERS).
DUE TO DIALING RESTRICTIONS, WE ARE REQUESTING
NXX=260 (865-260-XXXX) WHICH IS IN THE NANPA LIST OF
AVAILABLE CODES. 865-xxx-3, 865-xxx-4, 865-xxx-5

d) Codes that are undesirable, if any ALL OTHERS. NXX
CANNOT = 90X THRU 99X.

e) Type of change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center
☐ Tandem Homing CLLI
☐ OCN-Inter-company¹² ☐ 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): REQUESTING A FULL NXX
FOR REPLENISHMENT FOR CUSTOMER'S REQUEST FOR 3 BLOCKS

(3000 CONSECUTIVE NUMBERS). DUE TO DIALING RESTRICTIONS, WE ARE REQUESTING NXX=260 (865-260-XXXX) WHICH IS IN THE NANPA LIST OF AVAILABLE CODES. ALSO, NXX CANNOT = 90X THRU 99X.

1.8 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.

Comments:

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:¹⁴

MARTA ANTELO

ASSOC
TECH
SUPPORT 01/12/2011
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 (800-228-8597) 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 shall 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 An incomplete form may result in delays in processing this request.

Pooling Administration System

Sign Out

 MARTA.ANTELO@ATT.COM (SP)

Time : 01/12/2011 12:30:32 PM EST

-  Individual Block Request s
-  CO/NXX Code Request s
-  Withdraw Pending Request s
-  Confirm Resource s In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

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: 865-MARYVILLE-TN-409323

Date: 01/12/2011

OCN: 9419

Company Name: BELLSOUTH SO
CNTL

Rate Center: MARYVILLE

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

Name of Block Applicant: 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: 30552

B. Assigned Numbers: 49118

C. Total Numbering Resources: 82565

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

E. Growth
History -
Previous
6 months³

<u>108</u>	<u>221</u>	<u>314</u>	<u>87</u>	<u>191</u>	<u>146</u>
------------	------------	------------	-----------	------------	------------

F.
Forecast -
Next 12
months⁴

<u>178</u>	<u>178</u>	<u>178</u>	<u>10178</u>	<u>178</u>	<u>178</u>	<u>178</u>	<u>178</u>	<u>178</u>	<u>178</u>	<u>178</u>	<u>178</u>
------------	------------	------------	--------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 1844.667

H.
Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	30552	16.562
2	31552	17.104
3	32552	17.647

I.
Utilization⁶ =

Assigned Numbers(B) - Excluded
Numbers(D)

X 100 = 59.49

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)
neustar	Question? Email us © 1997-2012 Neustar, Inc. Legal Notice

Pooling Administration System

Sign Out

 MARTA.ANTELO@ATT.COM (SP)

Time : 01/12/2011 12:31:10 PM EST

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

Printable Version

Attachment 3

November 21, 2003
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 865-MARYVILLE-TN-409323

Date of Application: 01/12/2011 Effective Date: _____
Date of Receipt: 01/12/2011 Date of Response: 01/12/2011

Service Provider Name: BELLSOUTH SO CNTL

(Telcordia TM LERG
TM 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 _____

Block _____

or NPA-
NXX-X : _____

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 _____

MAVLTNMADS0

Rate Center: _____

MARYVILLE

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:

¹This 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 shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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TENNESSEE AIR NATIONAL GUARD
HEADQUARTERS 134th AIR REFUELING WING
MCGHEE TYSON ANG BASE TENNESSEE

18 Nov 2010

MEMORANDUM FOR: AT&T (Mr. George Debaby)

FROM: 134 CF/SCXP

SUBJECT: Prefix change for McGhee Tyson Air National Guard Base

1. The 134th Air Refueling Wing will be changing our telephone switch from the Nortel SL-1 Option 81-C to the newer Nortel CS-1000M. In the process of converting over to 7 digit dialing, and in preparation for VOIP, we discovered that our existing prefix (985) and the Air Force mandated Long Distance Access Code (98) would conflict. We have requested a waiver to change our Long distance Access Code, but several sources state that the waiver will not be approved.

2. Our only option is to change our prefix to something other than 985. I understand that availability may be limited due to the fact that we are requesting in excess of 2500 numbers. But, we would like to ask for a few items to be considered while you are researching this matter.

- a. The prefix cannot start with 90, 91, 92, 93, 94, 95, 96, 97, 98, 99.
- b. We would like to keep our current suffix range of 3000-4599, and 4700-5599 since these Direct In-Dial (DID) numbers are associated with our Defense Switched Network (DSN) numbers.

Note: We used to service the Army Guard attached to our facility, but due to manning and money, we had to discontinue service. We let them take the 4600 block with them when they established their own phone service. If we get a new prefix, then we would like to reserve and add the 4600 range back in. So, our range would be 3000-5599.

- c. Our DSN prefix is 266. Would it be possible to match that with our new prefix? Or can we request the prefix to be consecutive numbers (i.e. 234, 345, 456, etc)? Easier is better when trying to remember phone numbers.

3. If you have any questions, please feel free to call.

RUSSELL C. MESSER, SMSgt, TNANG
134CF/SCXP
Comm (865)985-3215 DSN 266-3215
Fax (865)985-3998
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TENNESSEE REGULATORY AUTHORITY



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

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

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", is written over a horizontal line.

K. David Waddell
Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Free 1-800-342-8339, Facsimile (615) 741-8953
www.state.tn.us/trs

Maryville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-379	0	121	666	872	76.376%
865-379	1	309	388	787	49.301%
865-379	2	484	299	807	37.051%
865-379	3	1	802	803	99.875%
865-379	4	46	862	948	90.928%
865-379	5	73	645	834	77.338%
865-379	6	330	535	901	59.378%
865-379	7	409	383	826	46.368%
865-379	8	473	335	845	39.645%
865-379	9	507	334	867	38.524%
865-380	0	500	309	837	36.918%
865-380	1	81	582	748	77.807%
865-380	2	265	310	591	52.453%
865-380	3	0	1,000	1,000	100.000%
865-380	4	172	266	503	52.883%
865-380	5	493	269	767	35.072%
865-380	6	426	541	980	55.204%
865-380	7	717	256	980	26.122%
865-380	8	577	310	936	33.120%
865-380	9	593	253	863	29.316%
865-448	0	716	242	969	24.974%
865-448	1	740	223	968	23.037%
865-448	2	754	185	973	19.013%
865-448	3	705	236	967	24.405%
865-448	6	471	410	910	45.055%
865-448	8	593	323	967	33.402%
865-448	9	605	342	961	35.588%
865-681	0	381	366	784	46.684%
865-681	1	364	380	787	48.285%
865-681	2	405	354	792	44.697%
865-681	3	406	355	794	44.710%
865-681	4	381	358	773	46.313%
865-681	5	96	573	741	77.328%
865-681	6	398	344	786	43.766%
865-681	7	387	411	829	49.578%
865-681	8	402	371	800	46.375%
865-681	9	468	311	803	38.730%
865-738	4	0	1,000	1,000	100.000%
865-738	6	0	1,000	1,000	100.000%
865-977	0	289	444	768	57.813%
865-977	1	309	428	770	55.584%
865-977	2	206	783	1,000	78.300%
865-977	3	536	457	996	45.884%
865-977	4	252	297	619	47.981%
865-977	5	49	394	476	82.773%

Maryville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-977	6	329	410	781	52.497%
865-977	7	307	423	758	55.805%
865-977	8	327	430	790	54.430%
865-977	9	345	423	796	53.141%
865-980	0	486	340	849	40.047%
865-980	1	35	814	916	88.865%
865-980	2	44	738	842	87.648%
865-980	3	68	619	732	84.563%
865-980	4	0	799	800	99.875%
865-980	5	222	264	550	48.000%
865-980	6	562	248	881	28.150%
865-980	7	458	207	733	28.240%
865-980	9	531	341	893	38.186%
865-981	0	1	999	1,000	99.900%
865-981	1	176	371	684	54.240%
865-981	2	64	299	436	68.578%
865-981	3	76	731	879	83.163%
865-981	4	249	377	693	54.401%
865-981	5	184	296	531	55.744%
865-981	6	211	744	972	76.543%
865-981	7	393	388	836	46.411%
865-981	8	16	901	950	94.842%
865-981	9	403	332	793	41.866%
865-982	0	76	591	783	75.479%
865-982	1	100	585	792	73.864%
865-982	2	81	565	773	73.092%
865-982	3	97	552	772	71.503%
865-982	4	90	561	763	73.526%
865-982	5	178	507	757	66.975%
865-982	6	78	537	747	71.888%
865-982	7	104	524	760	68.947%
865-982	8	77	562	763	73.657%
865-982	9	106	554	817	67.809%
865-983	0	297	448	781	57.362%
865-983	1	75	559	764	73.168%
865-983	2	103	574	778	73.779%
865-983	3	283	470	779	60.334%
865-983	4	100	535	754	70.955%
865-983	5	87	561	772	72.668%
865-983	6	281	455	769	59.168%
865-983	7	88	517	729	70.919%
865-983	8	76	520	731	71.135%
865-983	9	293	442	776	56.959%
865-984	0	77	546	725	75.310%
865-984	1	84	509	730	69.726%

Maryville Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-984	2	114	527	756	69.709%
865-984	3	294	448	784	57.143%
865-984	4	240	483	781	61.844%
865-984	5	100	533	749	71.162%
865-984	6	101	559	764	73.168%
865-984	7	131	508	740	68.649%
865-984	8	200	482	747	64.525%
865-984	9	211	459	747	61.446%
865-995	0	314	521	915	56.940%
865-995	1	415	448	923	48.537%
865-995	2	293	548	909	60.286%
865-995	9	331	502	912	55.044%

Totals:		27,552	49,118	82,565	59.490%
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