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January 19, 2011

VIA HAND DELIVERY

filed electronically in docket office on 01/19/11

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 Covenant Health

Docket No 11-00014

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 Covenant Health

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 Morristown 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 18, 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 5,000 consecutive Numbers necessary to meet the demands of its customer, Covenant Health ("Covenant"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.
- 8. The code assignment request was for 5,000 consecutive Numbers in the 865 NPA area code, in response to Covenant's request for 5,0000 consecutive numbers in the "2" thousands block. Covenant cited a new healthcare facility as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Morristown rate center, and,

accordingly, AT&T Tennessee was unable to provide Covenant 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 Morristown rate center had an MTE of approximately 24 months.
- 11. Despite the fact that AT&T Tennessee's Morristown rate center may not exhaust for 24 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Covenant within the Morristown rate center. This is because the individual switch that serves this customer within the Morristown rate center does not have sufficient number resources to meet the customer's request.
- 12. On or about January 18, 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 business customer with the requested numbers prevents AT&T Tennessee from providing the quality

of service this customer desires and expects. (Correspondence from Covenant 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 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 Morristown rate center, including the MRTWTNMADSO 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 Covenant 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 Covenant'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 Covenant's needs, NeuStar is preventing Covenant 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 Covenant in order that Covenant 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 Covenant in the Morristown rate center within the 865 NPA.

Respectfully submitted,

AT&T TENNESSEE

Guy M. Hicks

Joelle Phillips

333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

(615) 214-6311

Pooling Administration System								
rw0052@att.com (SP)		Sign Out						
	Time: 01	1/18/2011 02:44:48 PM EST						
		Printable Version						
	Centi	rdi Office Code (NXX Assignment Request Part i December 5, 2005						
	racking umber:	423-MORRISTOWN-TN-410017						
		Full NXX: Pool Replenishment						
	ype of pplication:	New Change Delete						
1.	0 GENERAL II	INFORMATION						
1.	1 Contact Infor	rmation:						
<u>C</u> .	ode Applicant:							
Co Na	ompany/Entity ame:	BELLSOUTH SO CNTL						
	eadquarters ddress:	500 Broad St SE						
Ci	ty, State, Zip:	Gainesville ,GA ,30501						
Co	ontact Name:	Rena Butticaz						
Co	ontact	500 Broad St SE						

Address:

City, State, Zip: Gainesville, GA, 30501

Phone:

770-945-9630

FAX: **770-945-9630**

E-mail: rw0052@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-

<u>5502</u>

NXX:3

LATA: **474**

OCN:

1.2 NPA: 423 49419

Parent Company's

OCN(s) 9400

Switching Identification(Switch Entity/POI) 5

MRTWTNMADS0

Locality/City/Wire Center:

Rate Center: 6

MORRISTOWN

Homing Tandem Operating Co: 7

Tandem Homing

CLLI⁸

AT&T

:KNVLTNMA84T

1.3 Dates: Date of

Request Effective Date: 9 10

Application: 01/18/2011

03/25/2011

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? YesNoX
1.4 a) Type of company/entity requesting the code: <u>Incumbent</u> <u>Local Exchange Carrier (ILEC)</u> (LEC, IC, CMRS, Other)
b) Types of service: <u>Wireline</u> (e.g., Cellular - Type 2)
Code Assignment Preference (Optional) REQUEST NXX ENDING IN 2. i.e(423) XX2-XXXX 423-xxx-1, 423-xxx-2, 423-xxx-3, 423-xxx-4, 423-xxx-5
d) Codes that are undesirable, if any
^{e)} Type of change(Mark <u>all</u> 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

Petition of AT&T Tennessee Covenant Health Exhibit A Page 4 of 6

1.7 Code request fo		EQUEST FOI		
		MINISTER PROPERTY AND		
1.8 It is the code a information into BIRR cut-over for BIRRDS completed.		dar day natio	nwide minim	num interval
Comments:			***************************************	
is true and accurate application has bee Code (NXX) Assign (http://www.atis.org/	to the best of n n prepared in ac ment Guidelines	ny knowledg ccordance w s posted to the	e and that ith Central he ATIS W	this Office eb Site
Rena Butticaz			<u>Sr.</u> Specialist	01/18/2011
Signature of Code Ap	plicant		Title	Date
	is true and accurate application has bee Code (NXX) Assign (http://www.atis.org/application: 14	is true and accurate to the best of mapplication has been prepared in accode (NXX) Assignment Guidelines (http://www.atis.org/atis/clc/inc/incdapplication: 14	is true and accurate to the best of my knowledg application has been prepared in accordance w Code (NXX) Assignment Guidelines posted to the (http://www.atis.org/atis/clc/inc/incdocs.htm) as application: **Rena Butticaz**	Rena Butticaz Sr. Specialist

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 Telcordia TM Routing Administration (TRA) on 732-699-6700.
- This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM 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.
- 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 CLLI TM 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.

Petition of AT&T Tennessee Covenant Health Exhibit A Page 6 of 6

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

	Pooling Administration System									
ft rw0052@att	.com (SP) Sign Out									
	Time : 01/18/2011 02:45:48 PM EST									
34										
⊞ <u>≸</u> Individua I Block	Printable Version Appendix 3 May 16, 2008									
Request s										
± ≝CO/NXX Code	MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET. TN Level									
Request s	(Thousands-Block Number Pooling Growth Block Request)									
∰ ∰Withdra w Pending Request	Tracking Number: <u>423-MORRISTOWN-TN-410017</u>									
s ⊕ %⊈Confirm	Date: 01/18/2011 OCN:9419 Company Name:BELLSOUTH SO CNTL									
Resource s In Service	Rate Center: MORRISTOWN									
⊕ ≝Donate Blocks	List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):									
⊕ ∰Submit Forecast										
≝ r Search Forms	Name of Block Applicant: Rena Butticaz Signature: Rena Butticaz									
Reports	Name of Block Applicant: Rena Butticaz Signature: Rena Butticaz									
⊕ <u>©</u> lUser Profile	Title: <u>Sr. Specialist</u> Telephone No.: <u>770-945-9630</u> FAX No.: <u>770-945-9630</u>									
	E-mail: <u>rw0052@att.com</u>									

A. Available Numbers: 23073 B. Assigned Numbers: 34877 C. Total Numbering Resources: 57950 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) Block(s): h h h h h h h h h h h h #1 #2 #3 #5 #4 #7 #8 #9 #6 #10 #11 #12 E. Growth History -2809 <u>-54</u> <u>73</u> 162 <u>-5</u> <u>-1266</u> Previous 6 months³ F. Forecast -<u> 287</u> <u>287</u> <u>5287</u> <u>287</u> 287 <u>287</u> <u>287</u> <u>287</u> <u>287</u> <u>287</u> <u>287</u> <u>287</u> Next 12 months4

	e Monthly Forecast (Sum of months	(, -, -, -, -, -, -, -, -, -, -, -, -, -,
H. Months to Exhaust ⁵	Numbers Available for Assignment Customers(A)	nt to	
	Average Monthly Forecast(G)		
	Block Requested	Available Numbers	Months To Exhaust
	1	23073	20.595
	2	24073	21.487
	3	25073	22.38
	4	26073	23.273
	5	27073	24.165
I. Utilizatio n ⁶ =	Assigned Numbers(B) - Exclude Numbers(D)	ed X 100 = 60.185	
٦	Fotal Numbering Resources(C)-Exc Numbers(D)	luded	
Explanation:			
A copy of th	nis worksheet is required to be subn	nitted to the Poolina Adr	ministrator when requestir

additional numbering resources in a rate center. For auditing purposes, the applicant must retain a

Petition of AT&T Tennessee Covenant Health Exhibit B Page 4 of 4

copy of this document.

²Quantity 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).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

neustar

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Petition of AT&T Tennessee Covenant Health Exhibit C Page 1 of 3

Pooling Administration System

Dated 18-January-2011

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number :	MORRISTOWN- TN-410017	·····	
Date of Application:	01/18/2011	Effective Date:	
Date of Receipt:	01/18/2011	Date of Response:	01/18/2011
Service Provider Name:	BELLSOUTH SO	CNTL	
(Telcordia [™] LERG [™] Routing Guide) OCN:	9419		
NPAC SOA SPID :	~~·····		
Pooling Administrator (Contact Informatio	n:	
Genevieve Bettiga	Phone:		925-363- 7652
			Parties of the second s

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 Reserve	ed
	Block Reservation Expiration Date	• ;
	Block/Code Modified :	
	Block/Code Disconnected :	
Block Contaminated(Yes or No)	:	*********************
If Yes, enter the number of TNs of	contaminated :	
Switch Identification(Switch Entity	//POI): 1 MRTWTNMA	DS0
Rate Center:	MORRISTOW	/N
Rate Center Sub Zone:		

X Form Complete, request denied.

-								
-	v	n	21	77	+:	\sim	n	•
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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:

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

neustar

Remarks:

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

Petition of AT&T Tennessee Covenant Health Exhibit D



TO: Whom It May Concern From: Covenant Health Date: December 28, 2010

Please allow this to be a formal request for a new block of 5,000 consecutive numbers for the Morristown area. This request is to accommodate the recent merger of Morristown Hamblen Health Systems with Covenant Health and a block of consecutive numbers will allow this new facility to be linked to the existing Covenant Health telecom network providing patients quality care.

In order to keep a joined dial plan, the range of (423) $\underline{XX}2-5000$ thru (423) $\underline{XX}2-9999$ is being requested.

Please let me know if any additional information is needed.

Thanks,

Angie Ingle Telecom Supervisor Covenant Health IT 865-374-4618

TENNESSEE REGULATORY AUTHORITY

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



460 James Robertson Parkway Nachville, 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 cerner 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,

K DU Lelel

K. David Waddell Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Pree 1-800-342-8359, Facsimile (615) 741-8953

www.state.to.up/tra

Morristown Rate Center

	T			Total	
		Available	Assigned	Number	
NPA-NXX	Х	Numbers	Numbers	Resources	Utilization
423-317	0	434	354	810	43.704%
423-317	1	11	925	939	98.509%
423-317	2	13	971	988	98.279%
423-317	3	13	847	889	95.276%
423-317	4	60	900	960	93.750%
423-317	5	2	374	999	37.437%
423-317	6	9	430	847	50.767%
423-317	7	476	324	811	39.951%
423-317	8	550	259	841	30.797%
423-317	9	535	289	857	33.722%
423-318	0	473	336	825	40.727%
423-318	1	102	777	922	84.273%
423-318	2	94	546	712	76.685%
423-318	3	330	612	960	63.750%
423-318	4	0	1,000	1,000	100.000%
423-318	5	50	910	960	94.792%
423-318	6	405	446	870	51.264%
423-318	7	168	608	899	67.631%
423-318	8	335	486	833	58.343%
423-318	9	151	652	874	74.600%
423-522	0	1,000	0	1,000	0.000%
423-522	1	999	1	1,000	0.100%
423-522	2	560	440	1,000	44.000%
423-522	3	0	1,000	1,000	100.000%
423-522	4	0	0	1,000	0.000%
423-522	5	0	1,000	1,000	100.000%
423-522	6	100	900	1,000	90.000%
423-522	7	900	100	1,000	10.000%
423-522	8	1,000	0	1,000	0.000%
423-522	9	1,000	0	1,000	0.000%
423-581	0	105	452	725	62.345%
423-581	1	62	532	705	75.461%
423-581	2	126	457	679	67.305%
423-581	3	253	411	714	57.563%
423-581	4	234	420	695	60.432%
423-581	5	225	455	735	61.905%
423-581	6	339	374	746	50.134%
423-581	7	297	394	726	54.270%

Morristown Rate Center

				Total	
		Available	Assigned	Number	
NPA-NXX	Х	Numbers	Numbers	Resources	Utilization
423-581	8	88	555	727	76.341%
423-581	9	285	409	733	55.798%
423-585	0	352	368	753	48.871%
423-585	1	41	953	995	95.779%
423-585	2	45	834	890	93.708%
423-585	3	317	391	812	48.153%
423-585	4	113	690	926	74.514%
423-585	5	389	350	758	46.174%
423-585	6	237	511	748	68.316%
423-585	8	13	926	951	97.371%
423-585	9	40	931	989	94.135%
423-586	0	241	442	739	59.811%
423-586	1	221	455	738	61.653%
423-586	2	218	432	714	60.504%
423-586	3	274	456	772	59.067%
423-586	4	308	420	757	55.482%
423-586	5	143	485	714	67.927%
423-586	6	279	415	725	57.241%
423-586	7	131	497	730	68.082%
423-586	8	86	502	682	73.607%
423-586	9	278	420	764	54.974%
423-587	0	90	522	729	71.605%
423-587	1	332	366	717	51.046%
423-587	2	279	357	675	52.889%
423-587	3	371	343	742	46.226%
423-587	4	357	368	746	49.330%
423-587	5	377	346	757	45.707%
423-587	6	178	456	763	59.764%
423-587	7	55	790	876	90.183%
423-587	8	173	519	810	64.074%
423-587	9	351	386	756	51.058%

Totals: 23,073 34,877 57,950 60.185%

CERTIFICATE OF SERVICE

	I hereby	y cert	ify that	on	Januar	у 19,	2011,	а	copy	of the	foregoing	docume	nt
was	served or	n the	parties	of r	ecord,	via th	ie meth	าดด	d indic	ated:			

[]	Hand	
	}	U.S. Mail	
[]	Facsimile	
[]	Overnight	Mail
	1	Electronic	Mail
· N	1	The state of the s	

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

