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March 7, 2012

HAND DELIVERY

Honorable Kenneth C. Hill, Chairman c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243

> RE: NeuStar, Inc., in its role as North American Numbering Plan Administrator Petition for Approval of Numbering Plan Area Relief Plan for the 615 NPA Docket No. 11-00018

Dear Chairman Hill:

Enclosed please find the original and thirteen (13) copies of the *Comments of Sprint* in the above-captioned matter. One (1) additional copy is enclosed to be filed-stamped for our records.

If you have any questions or require additional information, please let us know.

Very truly yours,

Melvin J. Malone

clw Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

NeuStar, Inc., in its role as North American)	
Numbering Plan Administrator)	
)	Docket No. 11-00018
Petition for Approval of Numbering Plan)	
Area Relief Plan for the 615 NPA	j	

COMMENTS OF SPRINT

Sprint Communications Company L.P. ("Sprint") hereby files its comments in this matter. As a provider of wireless and wireline service through its affiliates in Tennessee, Sprint has an interest in this matter.

On February 29, 2012, the Tennessee Regulatory Authority ("Authority") requested comment on whether it should dismiss the petition filed by NeuStar in this proceeding due to projected exhaust of the 615 area code being farther in time than originally projected by NANPA. The projected exhaust was originally predicted to occur around fourth quarter 2013, but it is now not expected until third quarter 2016.

Rather than dismiss the petition, the Authority should keep this docket open and hold the petition in abeyance.

As noted in NeuStar's petition, industry representatives have participated in a meeting on this issue and decided, by consensus, that an overlay for 615 would be the most appropriate form of relief. In terms of the North American Numbering Plan, 2016 is not very far off. If NeuStar restarts relief planning for the 615 area code as it is supposed to, 36 months prior to the NANPA exhaust date of third quarter 2016, it would have to restart the process of relief planning in October 2013, which is just a little over a year and a half away.

Nothing is likely to change the industry consensus that relief should be accomplished via an overlay. Indeed, Sprint's subject matter experts concur that only an overlay meets current NPA Relief Guidelines based on the concentrated population in the Nashville rate center.

Rather than throw away work already accomplished on this matter by impacted industry participants and NeuStar, it makes sense to hold the docket in abeyance and allow NeuStar to alert the Authority when it is again time for it to address this issue.

Respectfully submitted,

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