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March 19, 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 Verizon* 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

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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)	

COMMENTS OF VERIZON

Verizon¹ hereby responds to the Notice of Filing Comments issued by the Authority in this docket on February 29, 2012. The Authority asked whether the Petition of the North American Numbering Plan Administrator ("NANPA") for a distributed overlay of the 615 numbering plan area ("NPA") should be dismissed because NANPA's projection for the exhaustion of central office codes for the 615 NPA had been extended from the fourth quarter of 2013 to the third quarter of 2016. Verizon respectfully requests that the Authority proceed with this case and grant NANPA's petition.

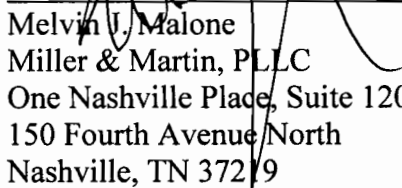
In NANPA's March 16, 2012, filing, it noted that it recently revised its projection of the 615 NPA exhaust date to the second quarter of 2015. If this case is dismissed, NANPA immediately would have to restart its work because NANPA begins NPA relief planning 36 months in advance of the projected exhaust date. The industry, which already has determined that the best solution is a distributed overlay because of the concentrated population in the Nashville rate center, then would have to reconvene and request NANPA to file another petition requesting the same relief. Moreover, if the Authority dismisses the case it would run the risk of

¹ MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, and Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of Tennessee d/b/a Verizon Wireless collectively are referred to herein as "Verizon."

not leaving itself, NANPA and the telecommunications industry enough time to take appropriate action if the exhaust projection is shortened again. The industry has recommended that relief be implemented on a 15-month schedule and additional time will be required before the schedule begins for the NANPA to perform administrative tasks such as assigning the new NPA, holding the industry initial implementation meeting, and publishing the Planning Letter. The Authority should move forward with this case to ensure it has sufficient time to consider the recommended relief and to implement that relief smoothly.

Sprint Communications Company L.P. ("Sprint") filed comments on March 7, 2012, before NANPA's filing, requesting that the Authority hold the case in abeyance until notified by NANPA that a decision was needed. Sprint has informed Verizon that in light of NANPA's filing, it supports Verizon's request that the Authority move forward with this case now.

Respectfully submitted,



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