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VIA UPS NEXT DAY DELIVERY

March 4, 2011


Tennessee Regulatory Authority
Attn: Ms. Sharla Dillon, Dockets Manager
460 James Robertson Parkway
Nashville, TN 37243-0505

**RE: PETITION of Citizens Telecommunications Company of
Tennessee L.L.C. d/b/a Frontier Communications Company of
Tennessee ("Frontier") for Expedited Review of Growth
Thousand Blocks by the Number Pooling Administration;
Docket No. 11-00035**

Dear Ms. Dillon:

Please find enclosed for filing the original and twelve (12) copies of the above-referenced PETITION by Citizens Telecommunications Company of Tennessee L.L.C. Also enclosed is our \$25 check for the filing fee.

Very truly yours,



Gregg C. Sayre
Assistant Secretary

GCS/hmj
Encl. (original + 12 copies, filing fee)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: PETITION FOR EXPEDITED)	
REVIEW OF GROWTH THOUSAND)	
BLOCKS BY THE NUMBER POOLING)	DOCKET NO. 11- _____
ADMINISTRATION)	

**PETITION OF CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE
L.L.C. D/B/A FRONTIER COMMUNICATIONS COMPANY OF TENNESSEE
FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL**

Citizen Telecommunications Company of Tennessee L.L.C. d/b/a Frontier Communications Company of Tennessee ("Frontier"), pursuant to rules adopted by the Federal Communications Commission for challenging determination of the Number Pooling Administrator ("Neustar"), petitions the Tennessee Regulatory Authority for an expedited review of NeuStar's denial of Frontier's application for an additional 10,000 block in the 931 area code.

1. Frontier is an incumbent local exchange carrier providing telecommunications services in Tennessee under the jurisdiction of the Tennessee Regulatory Authority and is the holder of a TRA Certificate of Public Convenience and Necessity.
2. NeuStar is an independent, non-government entity that is responsible for administering and managing numbering resources in pooling areas. *See* 47 C.F.R. § 52.13 (a) and (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 00-249" 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 00-249, 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 the existing telephone numbers and to slow further exhaustion of existing numbers under the North American Numbering Plan.
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 to NeuStar. The FCC further required that to qualify for access to new numbering resources, applications must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application.
6. In addition to the months-to-exhaust (“MTE”) requirement described above, the FCC’s rules also require carriers to meet a rate center utilization threshold of 60 percent to receive additional numbering resources in a given rate center. FCC 00-249 at ¶¶22; FCC 01-362 ¶¶50-52. The utilization threshold increases by five percent per year until it reaches a maximum 75 percent. Based on the FCC’s orders, carriers must meet both the six-month MTE requirement and the utilization threshold on a rate center basis to obtain additional number resources. *Id.* ¶29.
7. On January 21, 2011, Frontier submitted a National Pooling Request for an additional block of 10,000 numbers. This request is attached hereto as **Exhibit A**. Exhibit A also includes Frontier’s MTE calculations.
8. On January 21, 2011, Frontier’s request was denied on the grounds that Frontier did not meet the utilization threshold required in the Central Office Code (NXX) Guidelines. This decision is attached hereto as **Exhibit B**.

9. As result of the denial of Frontier's request for additional numbering resources, Frontier is unable to provide needed and improved telecommunications technology and services to its customers in Tennessee.
10. Specifically, the new central office code for Cookeville is necessary for Frontier to establish a new Location Routing Number ("LRN") for a new Metaswitch MG 3510 Gateway switch. *See Exhibit A.* Frontier's new switch will ultimately replace an existing switch, but both switches must be in operation for a period of time with separate LRNs to allow an orderly migration of customers from the existing switch to the new switch. The new switch is required to provide adequate growth service to Frontier's customers. The existing switch is older TDM technology and Frontier wants to deploy newer IP technology and be able to supply its customers from a platform that is not toward the end of its service life. Once both switches are operational, Frontier will port all customers served by the existing switch to the new switch. There is no time frame for migrating the customers between switches. In addition, Frontier will be using only a 1000 number block and returning the remaining numbers to NeuStar.
11. Under previous procedures used by the North American Numbering Plan Administration ("NANPA"), waivers or exceptions were typically granted in any case 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 customer needs. Under existing procedures, however, NeuStar looks at the MTE criteria and utilization threshold for the rate center and allows no exceptions. By refusing to consider the circumstances of each case, NeuStar's procedure may result 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.
12. Both the FCC Order 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* 47 C.F.R. §52.15 (g)(4).

13. This Authority has previously received similar requests from Frontier and/or its affiliates and BellSouth Telecommunications, Inc. for the Authority to overrule a decision of NANPA and NeuStar. *See* Docket 03-00482, Docket 03-00591, Docket 04-00254, Docket 06-00257, Docket 08-00096 and Docket 10-00100.
14. Frontier seeks the Authority's review of NeuStar's decisions to withhold numbering resources from it on the grounds that the CO Code Administration database denial (1) violates the rules and orders of the FCC which grant carriers access to numbering resources to meet specific customer needs and (2) interferes with Frontier's ability to serve its customers within Tennessee.

Relief Sought

For these reasons, Frontier requests that the Authority review the decision of NeuStar to deny Frontier's request for additional numbering resources and direct NeuStar to assign a new 10,000 block to meet customer needs for technology and services in Cookeville, Tennessee.

Respectfully submitted,

Citizen Telecommunications Company of Tennessee L.L.C.
d/b/a Frontier Communications Company of Tennessee

By: _____

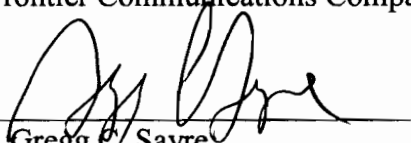

Gregg E. Sayre
Assistant Secretary

Exhibit A

Pooling Administration System	
<input type="checkbox"/> * stephen_bonno@frontiercorp.com (SP)	• Sign Out
Time : 01/21/2011 10:51:11 AM EST	
Printable Version	
Central Office Code (NXX) Assignment Request Part 1 December 9, 2005	
Tracking Number:	<u>931-COOKEVILLE-TN-410538</u>
	<u>Full NXX: LRN</u>
Type of Application:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Delete
1.0 GENERAL INFORMATION	
1.1 Contact Information:	
<u>Code Applicant:</u>	
Company/Entity Name:	<u>FRONTIER CM TN</u>
Headquarters Address:	<u>180 S. Clinton Ave.</u>
City, State, Zip:	<u>Rochester, NY, 14646</u>
Contact Name:	<u>Stephen Bonno</u>
Contact Address:	<u>180 S. Clinton Ave.</u>
City, State, Zip:	<u>Rochester, NY, 14646</u>
Phone:	<u>585-777-8011</u> FAX: <u>585-454-6726</u> E-mail: <u>stephen.bonno@ftr.com</u>
<u>Code Administrator:</u> ²	
Name:	<u>Michael Ortega</u>
Address:	<u>46000 Center Oak Plaza</u>
City, State, Zip:	<u>Sterling, VA, 20166</u>
Phone:	<u>571-434-5348</u> FAX: <u>571-434-5502</u>
1.2 NPA: <u>931</u> NXX: ³<u>4336</u> LATA: <u>470</u> OCN: ⁴<u>3400</u> Parent Company's OCN(s) <u>3400</u>	
Switching Identification(Switch Entity/POI) ⁵ <u>CKVLTXAPS0</u>	
Locality/City/Wire Center:	<u>COOKEVILLE</u> Rate Center: ⁶ <u>COOKEVILLE</u>
Homing Tandem Operating Co: ⁷ <u>FRONTIERCOMMUNICATIONS</u>	Tandem Homing CLLI ⁸ : <u>CKVLTXA71T</u>

1.3 Dates: Date of
Application: 01/21/2011

Request Effective Date: ^{9 10}
03/28/2011

☐ 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)

c) Code Assignment Preference (Optional) 931/651/4X

d) Codes that are undesirable, if any _____

e) Type of change (Mark all 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

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

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

Stephen Bonno

Signature of Code Applicant

Sr.
Engineer-
Number 01/21/2011
Planning
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 Telcordia TM 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 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.

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 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.

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X

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Pooling Administration System	
<input type="checkbox"/> * stephen_bonno@frontiercorp.com (SP)	Sign Out
Time : 01/21/2011 10:53:54 AM EST	
Printable Version	
TBPAG Attachment 1 - March 19, 2007	
Thousands-Block Application Form - Part 1A	
Tracking Number:	<u>931-COOKEVILLE-TN-410538</u> <u>Full NXX: LRN</u>
Type of Application:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect
<u>GENERAL APPLICATION INFORMATION</u>	
1.1 Contact Information:	
<u>Block Applicant:</u>	
Company Name:	<u>FRONTIER CM TN</u>
Headquarters Address:	<u>180 S. Clinton Ave.</u>
City, State, Zip:	<u>Rochester, NY, 14646</u>
Contact Name:	<u>Stephen Bonno</u>
Contact Address:	<u>180 S. Clinton Ave.</u>
City, State, Zip:	<u>Rochester, NY, 14646</u>
Phone: <u>585-777-8011</u>	FAX: <u>585-454-6726</u> E-mail: <u>stephen.bonno@ftr.com</u>
<u>Pooling Administrator:</u> ⁱⁱ	
Contact Name:	<u>Genevieve Bettiga</u>
Contact Address:	<u>1800 Sutter St</u>
City, State, Zip:	<u>Concord, CA, 94520</u>
Phone: <u>925-363-7652</u>	FAX: <u>925-363-7683</u>
E-mail: <u>genevieve.bettiga@neustar.biz</u>	
1.2 General Information:	

Check one : No LRN needed _____ LRN needed ⁱⁱⁱ X

NPA: 931 LATA: 470 OCN: ^{iv} 4336 Parent Company's OCN 3400

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
 CKVLTNXAPS0

City or Wire Center Name : _____
 COOKEVILLE

Rate Center: ^{vi}
 COOKEVILLE

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} _____
 01/21/2011

Requested Block Effective Date:
^{viii} 03/28/2011

☐ 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? (See Section 8.6) Yes _____ No X

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) _____
 931/651/4X

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) 931-xxx-4,

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 X 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 ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company ^x ☐ 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 as of the date of this application.

Stephen Bonno

Signature of Block Applicant

Sr.
Engineer-
Number 01/21/2011
Planning

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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based provider^{xi}. 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. The 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 :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} 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).

^v 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 CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} 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).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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Exhibit B

Pooling Administration System	
<input type="checkbox"/> stephen_bonno@frontiercorp.com (SP) • Sign Out	
Time : 01/21/2011 10:54:12 AM EST	
Printable Version	
November 21, 2003 Attachment 3	
ATIS-0300066.at3	
Pooling Administrator's Response/Confirmation TBPAG Part 3	
Tracking Number : <u>931- COOKEVILLE- TN-410538</u>	
Date of Application:	<u>01/21/2011</u> Effective Date: _____
Date of Receipt:	<u>01/21/2011</u> Date of Response: <u>01/21/2011</u>
Service Provider Name:	<u>FRONTIER CM TN</u>
(Telcordia TM LERG TM Routing Guide)	<u>4336</u>
OCN:	_____
NPAC SOA SPID :	_____
Pooling Administrator Contact Information:	
<u>Genevieve Bettiga</u>	Phone: <u>925- 363-7652</u>
Signature of Pooling Administrator	
<u>Genevieve Bettiga</u>	Fax: <u>925- 363-7683</u>
Name (print)	
Email:	<u>genevieve.bettiga@neustar.biz</u>
<u> </u> NPA-NXX or NPA-NXX-X : <u> </u>	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): ¹	<u>CKVLTNXAPS0</u>
Rate Center:	<u>COOKEVILLE</u>
Rate Center Sub Zone:	_____

☒ **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:

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

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