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gh1402@att.com

March 7, 2011

VIA HAND DELIVERY

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 Nissan North America, Inc.*
Docket No 11-00036

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



Proud Sponsor of the U.S. Olympic Team

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Nissan North America, Inc.*

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 615 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 Smyrna 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 March 7, 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 1,000 consecutive numbers necessary to meet the demands of its customer, Nissan North America, Inc. ("Nissan"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 1,000 consecutive numbers in the 615 NPA area code, in response to Nissan's request for 1,000 consecutive DID numbers. Nissan cited business expansion as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Smyrna rate center, and, accordingly, AT&T Tennessee was unable

to provide Nissan 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 Smyrna rate center had an MTE of approximately 20.8 months.

11. Despite the fact that AT&T Tennessee's Smyrna rate center may not exhaust for 20.8 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Nissan within the Smyrna rate center. This is because the individual switch that serves this customer within the Smyrna rate center does not have sufficient number resources to meet the customer's request.

12. On or about March 7, 2010, 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 Nissan is attached as Exhibit "D").

14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2010-2 NRUF and NPA Exhaust Analysis dated October 2010, the projected exhaust date of the 615 NPA is the 4Q 2013. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 615 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 Smyrna, including the SMYRTNMADSO 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 Nissan 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 Nissan'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 Nissan's needs, the NeuStar is preventing Nissan 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 Nissan in order that Nissan 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 Nissan in the Smyrna rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE



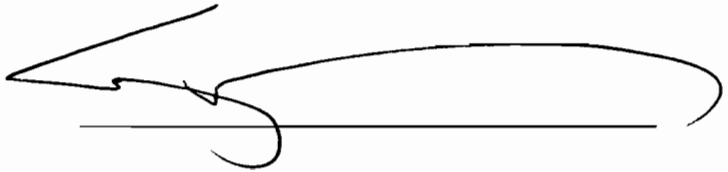
Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6311

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 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

A handwritten signature in black ink, appearing to read "Beth Sprague", is written over a horizontal line.

Pooling Administration System










Sign Out

 MARTA.ANTELO@ATT.COM (SP)

Time : 03/07/2011 09:33:26 AM EST

Printable Version

TBPAG Attachment 1 - March 19, 2007

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

Thousands-Block Application Form - Part 1A

Tracking Number: **615-SMYRNA-TN-422479**
Individual Block Request

Type of Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**

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**

Pooling Administrator: "

Contact Name: **Genevieve Bettiga**

Contact Address: **1800 Sutter St**

City, State, Zip: **Concord ,CA,94520**

Phone: **925-363-7652** FAX: **925-363-7683**

E-mail: genevieve.bettiga@neustar.biz

1.2 General Information:

Check one : No LRN needed X LRN needed ⁱⁱⁱ

NPA: 615 LATA: 470 OCN:^{iv} 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
 SMYRTNMADS0

City or Wire Center Name : Rate Center: ^{vi} SMYRNA
Rate Center Sub Zone:

1.3 Dates:

Date of Application: ^{vii} 03/07/2011 Requested Block Effective Date: ^{viii}
 04/07/2011

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)
CUSTOMER IS REQUESTING 1 BLOCK (1000 CONSECUTIVE #'S) FOR NPA
615-NXX-XXXX. BLOCKS 615-625-6. OR 615-984-3,5,7 ARE ALL AVAILABLE IN
THE POOL LIST AS NON-CONTAMINATED.
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
 ALL OTHERS.
- 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)

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: **CUSTOMER IS REQUESTING 1 BLOCK (1000 CONSECUTIVE #'S) FOR NPA 615-NXX-XXXX. BLOCKS 615-625-6,8 OR 615-984-3,5,7 ARE ALL AVAILABLE IN THE POOL LIST AS NON-CONTAMINATED.**

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.

MARTA ANTELO

Signature of Block Applicant

ASSOC
TECH
SUPPORT 03/07/2011
ANLYS
NTWK

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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 MARTA.ANTELO@ATT.COM (SP)

Time : 03/07/2011 09:34:29 AM EST

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May 16, 2008

Appendix 3

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level^T

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **615-SMYRNA-TN-422479**

Date: 03/07/2011OCN:9419

Company Name: BELLSOUTH TELECOMM INC
DBA SOUTH CENTRAL BELL TEL

Rate Center: **SMYRNA**

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

FAX No.: 305-264-2918

Telephone No.: **305-260-8213**

E-mail: MARTA.ANTELO@ATT.COM

A. Available Numbers: 9054

B. Assigned Numbers: **20990**

C. Total Numbering Resources:31939

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):

Month Month Month Month Month Month Month Month Month Month Month Month Month

	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12
E. Growth History - Previous 6 months ³	<u>171</u>	<u>29</u>	<u>1165</u>	<u>81</u>	<u>98</u>	<u>61</u>						

F. Forecast - Next 12 months ⁴	<u>268</u>	<u>268</u>	<u>268</u>	<u>1268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>	<u>268</u>
---	------------	------------	------------	-------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 434.667

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	9054	20.83

I. Utilization⁶

Assigned Numbers(B) - Excluded Numbers(D)

=

X 100 = 65.719

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))

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







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Time : 03/07/2011 09:35:11 AM 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 : 615-SMYRNA-
TN-422479

Date of Application: 03/07/2011 Effective Date: _____

Date of Receipt: 03/07/2011 Date of Response: 03/07/2011

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTH
CENTRAL BELL TEL

(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 or
NPA-NXX-X : _____

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

SMYRTNMADS0

Rate Center:

SMYRNA

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 block 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 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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Petition of AT&T Tennessee
Nissan North America
Exhibit D

NISSAN

NISSAN NORTH AMERICA

Corporate Office
P.O. Box 685001
Franklin, TN 37068-5001
Telephone: 615-725-1000

February 25, 2011

Dear AT&T,

Nissan North America recently requested 1,000 consecutive DID numbers for two of our locations (1,000 per site.) AT&T subsequently responded and advised there are no blocks of 1,000 numbers available for either location to accommodate our request.

We currently have two blocks of DID numbers for each location (specific to the application we are expanding). We have an immediate need to expand the existing blocks by 1,000 consecutive numbers (sequentially either before or after the existing range preferably) to accommodate the needs of our application.

Location #1	Location #2
Nissan Motor Acceptance Corporation 8900 Freeport Pkwy Irving, TX 75063	Nissan North America – Smyrna 983 Nissan Dr Smyrna, TN 37167
Existing Ranges: Range 1: 972-607-7000 thru 7199 Range 2: 972-607-8000 thru 8999	Existing Ranges: Range 1: 615-967-2000 thru 3999 Range 2: 615-267-7500 thru 7999

If we are not able to expand one of the existing ranges for each location by 1,000 consecutive numbers, we will still require 1,000 consecutive DID blocks for each location. However, please keep in mind that the last four digits of the new DID blocks must *not* conflict with the last four digits of the existing blocks for that particular location.

Please use this document as our official request to initiate an allocation request for the 1,000 consecutive blocks of DID numbers as described above.

Sincerely,



Dave Damron

Nissan North America, Inc.
Senior Consultant Telecom & Mobility
Information Systems
Email: dave.damron@nissan-usa.com
Phone: +1 615.725.0444
Mobile (Verizon): +1 615.946.0355
FAX: +1 615.267.7900

TENNESSEE REGULATORY AUTHORITY

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



460 James Robertson Parkway
Nashville, Tennessee 37243-0003

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".

K. David Waddell
Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-8993
www.state.tn.us/tra

Smyrna Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-220	0	305	356	704	50.568%
615-220	1	458	377	850	44.353%
615-220	2	320	466	845	55.148%
615-220	3	48	698	821	85.018%
615-220	4	517	322	860	37.442%
615-220	5	423	417	859	48.545%
615-220	6	241	586	897	65.329%
615-220	7	95	435	538	80.855%
615-220	8	120	270	482	56.017%
615-220	9	493	335	856	39.136%
615-223	0	328	412	783	52.618%
615-223	1	157	429	709	60.508%
615-223	2	73	877	977	89.765%
615-223	3	0	0	2	0.000%
615-223	5	162	341	610	55.902%
615-223	6	344	391	794	49.244%
615-223	7	451	366	840	43.571%
615-223	8	260	551	905	60.884%
615-223	9	354	417	825	50.545%
615-267	6	61	900	961	93.652%
615-267	7	0	500	500	100.000%
615-355	0	130	460	789	58.302%
615-355	1	81	563	732	76.913%
615-355	2	8	62	85	72.941%
615-355	3	10	854	977	87.410%
615-355	4	172	489	800	61.125%
615-355	5	268	385	708	54.379%
615-355	6	242	455	759	59.947%
615-355	7	298	464	842	55.107%
615-355	8	132	536	774	69.251%
615-355	9	252	447	807	55.390%
615-459	0	158	499	791	63.085%
615-459	1	8	51	70	72.857%
615-459	2	245	468	769	60.858%
615-459	3	100	565	780	72.436%
615-459	4	75	571	767	74.446%
615-459	5	93	499	736	67.799%
615-459	6	128	535	774	69.121%
615-459	7	142	505	769	65.670%
615-459	8	183	617	833	74.070%
615-459	9	119	519	759	68.379%

Smyrna Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-768	2	0	1,000	1,000	100.000%
615-768	7	0	1,000	1,000	100.000%

Totals:		8,054	20,990	31,939	65.719%
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