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July 20, 2011

VIA HAND DELIVERY

filed electronically in docket office on 07/20/11  
Docket No. 11-00115

Hon. Eddie Roberson, 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 HCA*  
Docket No. \_\_\_\_\_

Dear Chairman Roberson:

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 HCA*

Docket No. \_\_\_\_\_

**PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL**

BellSouth Telecommunications, LLC, dba AT&T Tennessee ("AT&T Tennessee")<sup>1</sup>, 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 Franklin 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).

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<sup>1</sup> Effective July 1, 2011, BellSouth Telecommunications Inc. was converted to BellSouth Telecommunications, LLC by operation of Georgia law (the law of the state in which the former BellSouth Telecommunications, Inc was incorporated).

3. On March 31, 2000, the Federal Communications Commission ("FCC") 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 July 16, 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 2,000 consecutive numbers necessary to meet the demands of its customer, HCA ("HCA"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 2,000 consecutive numbers in the 615 NPA area code, in response to HCA's request for two blocks of 1,000 consecutive numbers in a range other than 615-X44. HCA 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 Franklin rate center, and,

accordingly, AT&T Tennessee was unable to provide HCA 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 Franklin rate center had an MTE of approximately 30 months.

11. Despite the fact that AT&T Tennessee's Franklin rate center may not exhaust for 30 months, AT&T Tennessee is unable to provide the requested service through its switch that serves HCA within the Franklin rate center. This is because the individual switch that serves this customer within the Franklin rate center does not have sufficient number resources to meet the customer's request.

12. On or about July 16, 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 HCA 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 2011-1 NRUF and NPA Exhaust Analysis dated April 2011, the projected exhaust date of the 615 NPA is the 3Q 2015. 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 Franklin, including the FKLNTNCCRS5 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 HCA 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 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 HCA'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 HCA's needs, the NeuStar is preventing HCA 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**



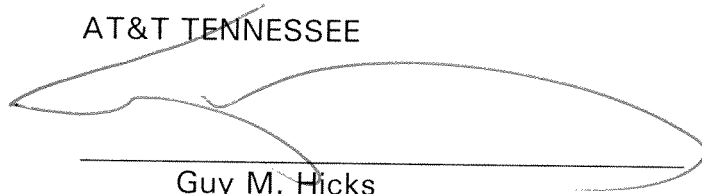
For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of HCA in order that HCA may receive the service of its choice from the provider of its choice 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 HCA in the Franklin rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, stylized handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

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 : 07/16/2011 10:38:45 AM EDT

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TBPAG Attachment 1 - March 19, 2007

## Thousands Block Application Form - Part 1A

Tracking  
Number: **615-  
FRANKLIN-TN-  
458321**  
**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: **500 Broad St SE**

City, State,  
Zip: **Gainesville, GA, 30501**

Contact  
Name: **Rena Buttica**

Contact  
Address: **500 Broad St SE**

City, State, Zip: **Gainesville , GA , 30501**

Phone: **770-945-9630** FAX: **770-945-9630** E-mail: [rw0052@att.com](mailto:rw0052@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](mailto:genevieve.bettiga@neustar.biz)

**1.2 General Information:**Check one : No LRN needed ☒ LRN needed <sup>iii</sup> ☐NPA: 615 LATA: 470 OCN: <sup>iv</sup> 9419 Parent Company's OCN 9400Number of Thousands-Blocks Requested : 2Switching Identification(Switch Entity/POI) : <sup>v</sup>  
FKLNTNCCRS5

City or Wire Center Name : \_\_\_\_\_

Rate Center: <sup>vi</sup>  
FRANKLIN

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**Date of Application: <sup>vii</sup> 07/16/2011Requested Block Effective Date: <sup>viii</sup>  
08/16/2011

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 ☒**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) 615-807-8&9
- 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) \_\_\_\_\_

**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 ☒ 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 <sup>ix</sup> Switching Id <sup>ix</sup> Part 1B

☐ OCN:Inter-company <sup>x</sup> 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](mailto:inc@atis.org) as of the date of this application.

**Rena Buttica**

**Signature of Block Applicant**

**Sr.** **Specialist** **07/16/2011**

**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 Telcordia<sup>TM</sup> LERG<sup>TM</sup> 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 Telcordia<sup>TM</sup> 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 CLLI<sup>TM</sup> tandem of the facilities

based provider<sup>xii</sup>. 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 :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> 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).

<sup>v</sup> 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 CLLI<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

# Pooling Administration System

 [rw0052@att.com](mailto:rw0052@att.com) (SP)
[Sign Out](#)

Time : 07/16/2011 10:39:05 AM EDT

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May 16, 2008

Appendix 3

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 615-FRANKLIN-TN-458321Date: 07/16/2011OCN: 9419Company Name: BELLSOUTH TELECOMM INC  
DBA SOUTH CENTRAL BELL TELRate Center: FRANKLIN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: Rena ButticaSignature: Rena ButticaTitle: Sr. SpecialistTelephone No.: 770-945-9630FAX No.: 770-945-9630E-mail: rw0052@att.comA. Available Numbers: 14663B. Assigned Numbers: 56986C. Total Numbering Resources: 76211D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: 0List  
Excluded  
Code(s)  
or  
Block(s):

Month	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<sup>3</sup>

259    85    163    171    30    163

F.  
Forecast -  
Next 12  
months<sup>4</sup>

145    145    2145    145    145    145    145    145    145    145    145    145

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 478.333

H. Months  
to  
Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

Block Requested

Available Numbers

Months To Exhaust

**1**

**14663**

**30.654**

**2**

**15663**

**32.745**

I.  
Utilization<sup>6</sup>  
=

Assigned Numbers(B) - Excluded  
Numbers(D)

X 100 =  
74.774

Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation: \_\_\_\_\_

<sup>1</sup>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.

<sup>2</sup>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).

<sup>3</sup>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.

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

<sup>5</sup>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)).

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

## Pooling Administration System

 rw0052@att.com (SP)

Sign Out

Time : 07/16/2011 10:39:19 AM EDT

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Attachment 3

November 21, 2003

ATIS-0300066.at3

**Pooling Administrator's Response/Confirmation**  
**TBPAG Part 3**

Tracking Number : **615-  
FRANKLIN-TN-  
458321**

Date of Application: **07/16/2011** Effective Date: \_\_\_\_\_

Date of Receipt: **07/16/2011** Date of Response: **07/16/2011**

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

(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN: **9419**

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): <sup>1</sup>

FKLNTNCCRS5

Rate Center:

FRANKLIN

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:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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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TENNESSEE REGULATORY AUTHORITY



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

460 James Robertson Parkway  
Nashville, 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 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 4<sup>th</sup> 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) 741-8953  
[www.state.tn.us/tra](http://www.state.tn.us/tra)

## Franklin Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-224	5	0	1,000	1,000	100.000%
615-224	9	215	534	771	69.261%
615-435	8	75	582	738	78.862%
615-465	5	301	598	1,000	59.800%
615-472	3	400	600	1,000	60.000%
615-472	4	0	1,000	1,000	100.000%
615-472	5	0	1,000	1,000	100.000%
615-503	1	0	1,000	1,000	100.000%
615-503	2	85	868	956	90.795%
615-503	9	228	652	926	70.410%
615-591	0	137	514	734	70.027%
615-591	1	122	523	736	71.060%
615-591	2	184	415	685	60.584%
615-591	3	157	367	606	60.561%
615-591	4	257	444	760	58.421%
615-591	5	157	521	770	67.662%
615-591	6	161	379	614	61.726%
615-591	7	266	448	761	58.870%
615-591	8	176	536	785	68.280%
615-591	9	240	449	722	62.188%
615-595	0	146	483	729	66.255%
615-595	1	132	529	735	71.973%
615-595	2	230	416	735	56.599%
615-595	3	0	1,000	1,000	100.000%
615-595	4	178	741	942	78.662%
615-595	5	147	538	787	68.361%
615-595	6	190	453	734	61.717%
615-595	7	203	471	746	63.137%
615-595	8	281	414	750	55.200%
615-595	9	240	460	749	61.415%
615-599	0	240	454	756	60.053%
615-599	1	216	460	745	61.745%
615-599	2	199	467	750	62.267%
615-599	3	258	447	746	59.920%
615-599	4	172	460	720	63.889%
615-599	5	180	472	751	62.850%
615-599	6	215	497	772	64.378%
615-599	7	284	467	790	59.114%
615-599	8	274	442	781	56.594%
615-599	9	302	419	782	53.581%
615-764	0	359	496	946	52.431%

## Franklin Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-764	3	91	738	832	88.702%
615-764	4	45	631	714	88.375%
615-764	6	0	800	800	100.000%
615-764	7	0	1,000	1,000	100.000%
615-764	8	0	1,000	1,000	100.000%
615-771	0	80	689	840	82.024%
615-771	1	88	625	864	72.338%
615-771	2	175	565	850	66.471%
615-771	3	148	651	888	73.311%
615-771	4	76	482	596	80.872%
615-771	5	100	737	908	81.167%
615-771	6	114	708	884	80.090%
615-771	7	85	678	859	78.929%
615-771	8	71	660	784	84.184%
615-771	9	86	653	835	78.204%
615-778	0	122	676	864	78.241%
615-778	1	114	464	690	67.246%
615-778	2	29	288	565	50.973%
615-778	3	23	695	782	88.875%
615-778	4	23	742	797	93.099%
615-778	5	300	700	1,000	70.000%
615-778	6	98	349	470	74.255%
615-778	7	2	991	996	99.498%
615-778	8	12	945	970	97.423%
615-778	9	95	672	889	75.591%
615-790	0	77	613	770	79.610%
615-790	1	65	606	774	78.295%
615-790	2	100	543	715	75.944%
615-790	3	85	571	741	77.058%
615-790	4	131	558	742	75.202%
615-790	5	88	438	562	77.936%
615-790	6	123	561	773	72.574%
615-790	7	102	583	768	75.911%
615-790	8	71	616	779	79.076%
615-790	9	93	592	779	75.995%
615-791	0	185	479	728	65.797%
615-791	1	99	565	772	73.187%
615-791	2	13	648	666	97.297%
615-791	3	114	459	599	76.628%
615-791	4	159	462	737	62.687%
615-791	5	65	635	804	78.980%

## Franklin Rate Center

NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
615-791	6	205	474	737	64.315%
615-791	7	95	453	793	57.125%
615-791	8	110	535	741	72.200%
615-791	9	131	493	733	67.258%
615-794	0	72	614	773	79.431%
615-794	1	97	642	813	78.967%
615-794	2	105	591	795	74.340%
615-794	3	124	598	778	76.864%
615-794	4	114	598	799	74.844%
615-794	5	93	576	768	75.000%
615-794	6	80	571	761	75.033%
615-794	7	57	589	758	77.704%
615-794	8	67	612	780	78.462%
615-794	9	159	556	786	70.738%

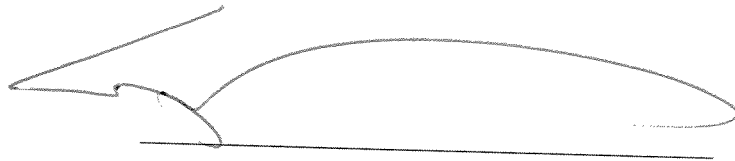
<b>Totals:</b>	12,663	56,986	76,211	74.774%
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 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  
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Sterling, VA 20166  
[Beth.sprague@neustar.biz](mailto:Beth.sprague@neustar.biz)

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