

AT&T Tennessee 333 Commerce Street Suite 2101 Nashville, TN 37201-1800

T: 615.214.6301 F: 615-214-7406 gh1402@att.com

August 25, 2011

filed electronically in docket office on 08/25/11

VIA HAND DELIVERY

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 Harton Regional Medical Center

11-00139 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

BEFORE THE TENNESSEE REGULATORY AUTHORITY Nashville, Tennessee

In Re: Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Harton Regional Medical Center

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 931 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 Tullahoma 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 August 25, 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, Harton Regional Medical Center ("Harton"). 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 931 NPA area code, in response to Harton's request for 2,000 consecutive numbers in 1XXX and 2XXX range. Harton cited business growth as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Tullahoma rate center, and, accordingly, AT&T Tennessee was unable to provide Harton 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 Tullahoma rate center had an MTE of approximately 28 months.
- 11. Despite the fact that AT&T Tennessee's Tullahoma rate center may not exhaust for 28 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Harton within the Tullahoma rate center. This is because the individual switch that serves this customer within the Tullahoma rate center does not have sufficient number resources to meet the customer's request.
- 12. On or about August 25, 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 Harton is attached as Exhibit "D").
- 14. Relief for the 931 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block pooling

for the 931 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 931 NPA is the 10 2025. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 931 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 Tullahoma, including the TLLHTNMADSO 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 Harton 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 Harton'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 Harton's needs, the NeuStar is preventing Harton 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 Harton in order that Harton 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 Harton in the Tullahoma rate center within the 931 NPA.

Respectfully submitted,

AT&T TENNESSEE

Guy M. Hicks

Joelle Phillips

333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

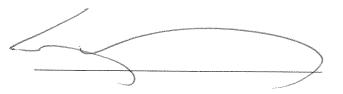
(615) 214-6311

CERTIFICATE OF SERVICE

I hereby	certify	that on	August	25,	2011,	а со	py of	the	foregoing	document
was served on	the par	rties of re	ecord, v	ia th	e meth	od in	dicat	ed:		

]	Hand	
[]	U.S. Mail	
[]	Facsimile	
[]	Overnight	Mail
-	Ţ	Electronic	Mail

Ms. Beth Sprague NeuStar/NANPA 46000 Center Oak Place Sterling, VA 20166 Beth.sprague@neustar.biz



Pooling Administration System

rw0052@att.com (SP)

Sign Out

Time: 08/25/2011 07:42:17 AM EDT

Printable Version

Contral Office Code (N.X.) Assignment Request Part Codember 1, 2005

Tracking Number:

931-TULLAHOMA-TN-474513

Full NXX: Pool Replenishment

Type of Application:

New Change,

Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity BELLSOUTH TELECOMM INC DBA SOUTH

Name: CENTRAL BELL TEL

Headquarters Address:

500 Broad St SE

City, State, Zip: Gainesville, GA, 30501

Contact Name: Rena Butticaz

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

Code Administrator: 2

Name: Michael Ortega

Address: 46000 Center Oak Plaza

City, State, Zip: Sterling, VA, 20166

Phone: <u>571-434-5348</u> FAX:<u>571-434-</u> 5502

NXX: 3 LATA: **470**

1.2 NPA: 931 49419

Parent Company's

OCN(s) <u>9400</u>

Switching Identification(Switch Entity/POI) 5

TLLHTNMADS0

Locality/City/Wire Center:

Rate Center: ⁶

OCN:

Homing Tandem Operating Co: Tandem Homing

Petition of AT&T Tennessee Harton Regional Medical Center Exhibit A Page 2 of 4

	CLLI [®] : NSVLTNMT84T
1.3 <u>Dates:</u> Date of Application: 08/25/2011	Request Effective Date: 910 10/30/2011
earliest possible effective da this only applies to a reduction	pox, I acknowledge that I am requesting the te the Administrator can grant. Please note that on in the Administrator's processing time, be processed in the order received.
Request Expedited Treatment	nt? YesNo X
Local Exchange Carrier (IL	//entity requesting the code:Incumbent .EC)(LEC, IC, CMRS, Other) (e.g., Cellular - Type 2)
c) Code Assignment 931-xxx-2	Preference (Optional)931-xxx-1,
^{d)} Codes that are und	desirable, if any666,888,999
^{e)} Type of change(Ma	ark <u>all</u> that apply)
Tandem Hom	mpany 12 Effective Date LATA
1.5 Type of Request (Initial,	growth, etc.) Growth
If an initial code, attach(1) evi place code in service within 6 exhaust worksheet.	dence of certification and (2) proof of ability to 0 days. If a growth code, attach months to
Pooling Indicator: 13 F	Yes No
	opply: Yes No
1.6 NPA Jeopardy Criteria A	,ppry. 103 140

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:

CODE REQUEST TO MEET CUSTOMER DIALING NEEDS

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

Rena Butticaz	Sr. Specialist	08/25/2011
Signature of Code Applicant	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.

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 [™] COMMON LANGUAGE CLLI [™] 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.

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 CLLITM 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

Petition of AT&T Tennessee Harton Regional Medical Center Exhibit A Page 4 of 4

guidelines.

- ^{1U} 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.

Pooling Administration System

Time: 08/25/2011 07:43:00 AM EDT

Printable Version

Sign Out

Appendix 3

rw0052@att.com (SP)

May 16, 2008

MONTHS (# 5X0AUST and Grid ZATION GERRIED AT ION WORKS HER AT WESTERN

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 931-TULLAHOMA-TN-474513

Date: 08/25/2011

OCN:<u>9419</u>

Company Name: BELLSOUTH TELECOMM INC

DBA SOUTH CENTRAL BELL TEL

Rate Center: TULLAHOMA

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

Name of Block Applicant: Rena Butticaz

Signature: Rena Butticaz

Title: Sr. Specialist

Telephone No.: 770-945-9630

FAX No.: 770-945-9630

E-mail: rw0052@att.com

A. Available Numbers: 10495

B. Assigned Numbers: 27104

C. Total Numbering Resources: 37599

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

History - Previous 6 months ³	<u>22</u>	<u>26</u>	<u>40</u>	<u>-86</u>	<u>191</u>	<u>28</u>						
F. Forecast - Next 12 months ⁴	<u>37</u>	<u>37</u>	<u>2037</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>	<u>37</u>
G. Average	Monthl	y Forec	ast (Sum	n of moi	nths 1-6	(Part F	above)	divided	by 6): <u>37</u>	70.333		
H. Months to Exhaust ⁵ =	<u>Nu</u> i	mbers A	vailable Custom		signment	<u>t to</u>						
		Averag	e Month	ly Fore	cast(G)							
		Bloc	k Reque 1 2	<u>sted</u>		<u>Avail</u>	able Nur 10495 11495	<u>nbers</u>			s To Ex 28.339 31.04	<u>rhaust</u>
I. Utilization ⁶ =		-	Numbe	ers(D)	Excluded	_	× 100 = 72.087	:				
	Total	Numbe	ring Res Numbe		(C)-Excl	uded						
Explanation:		***************************************		***************************************								

E. Growth

¹A 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.

²Quantity 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).

³Net 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.

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

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)).

^{**}Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Petition of AT&T Tennessee Harton Regional Medical Center Exhibit C Page 1 of 2

Dated 25-August-2011

November 21, 2003 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation

TBPAG Part 3

931- Tracking Number : TULLA 474513		OMA-TN-	•			
Date of Application:	08/25/20	011	Effective Date:	-		
Date of Receipt:	08/25/20	011	Date of Response:	08/25/20	8/25/2011	
Service Provider Name:		OUTH TEL L BELL TI	ECOMM INC DBA	SOUTH		
(Telcordia [™] LERG [™] Routing Guide) OCN:	9419				***********	
NPAC SOA SPID :	**************************************	************				
Pooling Administrator	Contact Ir	nformation	n:	005	000	
Genevieve Bettiga		Phone:		925- 7652	363-	
Signature of Pooling Adr	ninistrator	•		,,,,,,,,,,,,,		
Genevieve Bettiga		Fax:		925- 7683	363-	
Name (print) Email:		- geneviev	e.bettiga@neusta	ar.biz		
		Telegraphic and the second and the s		***********		
NPA-NXX or NPA-NXX-X :			Block A	Assigned:		
	ing mangapaga ang mangapaga		Block F	leserved		
			Block Reserva Expiratio			
			Block/C Modified		क्रवत्वकृतंत्रवेदस्यं वेदस्यं व	
			Rlock/C	inde		

Petition of AT&T Tennessee Harton Regional Medical Center Exhibit C Page 2 of 2

	Disconnected:
Block Contaminated(Yes or No):	
If Yes, enter the number of TNs contamin	nated :
Switch Identification(Switch Entity/POI): 1	TLLHTNMADS0
Rate Center:	TULLAHOMA
Rate Center Sub Zone:	
X Form Complete, request denied.	
Explanation:	
DR-57: You do not meet the MTE and/o therefore this request for a new code is requesting a State Waiver from the app this Part 3 denial. If you are in disagree request, please refer to the Thousands Administration Guidelines for the appe	s denied. You may proceed with propriate state commission using ement with the disposition of this 'Block Number (NXX-X) Pooling
Request withdrawn.	
Explanation:	
Assignment activity suspended by the	administrator.
Explanation:	
Remarks:	

neustar

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.)



Petition of AT&T Tennessee Harton Regional Medical Center Exhibit D



To whom it may concern,

Harton Regional Medical Center is constantly growing. With this growth comes the need for additional phone numbers for our patient rooms. Harton is requesting a new prefix for the Tullahoma area so we can add our additional phone lines for our patient rooms.

Number ranges:

last four (4) digits being

• 1200-1299

• 1300-1399

• 1400-1499

2200-22992300-2399

• 2400-2499

Reason:

As stated for continual growth

Date needed:

August 1, 2011

Let me know if this is possible and when can expect this change to happen.

Thank you,

Donald Cooper Jr.

Director of Information Systems Harton Regional Medical Center

TENNESSEE REGULATORY AUTHORITY

Sers Kyle, Chairman Lynn Greer, Director Melvin Malone, Director



460 James Robertson Parkway Nashville, Tennessee 37243-0503

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,

KDUDSELL

K. David Waddell Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Pres 1-800-342-8359, Factimile (615) 741-8953

Tullahoma Rate Center

		Available	Assigned	Total Number	
NPA-NXX	Х	Numbers	Numbers	Resources	Utilization
931-393	0	207	610	923	66.089%
931-393	1	10	954	976	97.746%
931-393	2	383	382	817	46.756%
931-393	3	355	344	777	44.273%
931-393	4	436	359	831	43.201%
931-393	5	524	339	910	37.253%
931-393	6	26	937	980	95.612%
931-393	7	6	971	997	97.392%
931-393	8	0	1,000	1,000	100.000%
931-393	9	0	1,000	1,000	100.000%
931-454	0	206	577	828	69.686%
931-454	1	63	745	826	90.194%
931-454	2	380	426	854	49.883%
931-454	3	1	999	1,000	99.900%
931-454	4	0	1,000	1,000	100.000%
931-454	5	0	1,000	1,000	100.000%
931-454	6	0	1,000	1,000	100.000%
931-454	7	1	999	1,000	99.900%
931-454	8	0	1,000	1,000	100.000%
931-454	9	423	339	796	42.588%
931-455	0	126	438	703	62.304%
931-455	1	291	409	741	55.196%
931-455	2	278	371	704	52.699%
931-455	3	252	399	706	56.516%
931-455	4	291	393	719	54.659%
931-455	5	194	406	670	60.597%
931-455	6	325	363	736	49.321%
931-455	7	161	502	748	67.112%
931-455	8	309	365	717	50.907%
931-455	9	321	400	758	52.770%
931-461	0	176	726	929	78.149%
931-461	1	59	862	951	90.641%
931-461	2	234	638	970	65.773%
931-461	3	389	449	852	52.700%
931-461	4	204	731	954	76.625%
931-461	5	448	375	855	43.860%
931-461	6	0	1,000	1,000	100.000%
931-461	7	120	766	948	80.802%
931-461	8	151	799	972	82.202%
931-461	9	388	491	900	54.556%
931-571	2	407	590	997	59.178%
931-588	4	350	650		
001.000		330	030]	1,000	65.000%

TOTAL: 8,495 27,104 37,599 72.087%