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September 29, 2011

**VIA HAND DELIVERY**

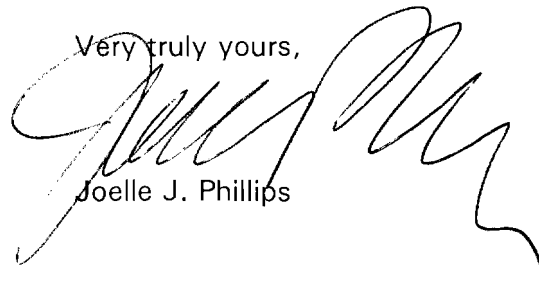
Hon. Kenneth Hill, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number  
Pooling Administrator – Gallatin Rate Center*  
Docket No 11-00167

Dear Chairman Hill:

Enclosed are the original and four copies of TCG Midsouth'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,



Joelle J. Phillips

JJP:ch

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

*IN RE:*

*Petition for Expedited Review of Growth Code  
Denial by the Number Pooling Administrator –  
Gallatin Rate Center*

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

**PETITION OF TCG MIDSOUTH INC FOR REVIEW  
OF CENTRAL OFFICE CODE DENIAL**

TCG Midsouth, Inc. ("TCG"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging the decision of the Number Pooling Administrator ("NeuStar"), hereby petitions the Tennessee Regulatory Authority ("TRA") to a review NeuStar's denial of TCG's application for an NPA-NXX-X in the Gallatin rate center in order for TCG to serve its customer.

1. TCG is a competitive local exchange carrier providing telecommunications services in Tennessee under the jurisdiction of the TRA.

2. NeuStar is an independent, non-governmental entity responsible for administering and managing numbering resources. *See* C.F.R. Section 52.13(a) and (b).

3. This petition is based on the FCC Rules found at 47 C.F.R. § 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines ("TBPAG") and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC"). On March 31, 2000, the FCC issued a *Report and Order and Further Notice of Proposed Rule Making* related to numbering resource optimization ("FCC 00-104" or the "March Order"). On December 29, 2000, the FCC issued a *Second Report and Order*, on

*Reconsideration* in CC Docket No. 96-98 and CC Docket No. 99-200, and *Second Further Notice of Proposed Rulemaking* in CC Docket No. 99-200 (“FCC 00-249” or the “December Order”). The Orders addressed issues and strategies relating to the efficient use of numbering.

4. In FCC 00-104 and FCC 00-429, the FCC announced rules and sought comments to implement uniform standards for numbering resources, to increase efficiency in the use of existing telephone numbers and to slow further exhaustion of the North American Numbering Plan.

5. FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring carriers to report rate center based utilization to NeuStar. The FCC further required that, to qualify for new numbering resources, applicants must prove that their existing inventory in the said rate center will exhaust within six months of the application.

6. In addition to the months-to-exhaust (“MTE”) threshold, the FCC also requires carriers to show rate center utilization of 75% to receive the additional numbering resources in said rate center.<sup>1</sup> Based on the FCC’s orders, carriers must meet both the six-month MTE requirement and the utilization threshold on a rate center basis to obtain additional number resources.<sup>2</sup>

7. A TCG customer, Rich Products Corporation (“Rich Products”), has requested 50 numbers, NOT in a 0, 1, 8 or 9 block in the Gallatin rate center. Rich Products needs these numbers for additional growth at this site. In addition, Rich Products has requested numbers in a block other than a 9-block to avoid calls dialed in error to emergency 9-1-1 service. Numbers in the 9-block currently used by Rich Products will be returned for general use. A copy of the

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<sup>1</sup> FCC 00-249 at Paragraph 22; FCC 01-362 Paragraphs 50-52.

<sup>2</sup> *Id.* at Paragraph 29.

letter outlining the request is attached as Exhibit A. TCG has developed a plan that the customer will implement so that all 50 numbers will be assigned and activated within 180 days.

8. The Gallatin rate center of the 615 Area Code converted to Number Pooling on March 14, 2002. Consequently, normal numbering resource acquisition by a Number Pooling carrier is gained through an interface with NeuStar<sup>3</sup>. 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 Third Quarter of 2015. Therefore, granting TCG's request for numbering resources would not materially impact the exhaustion of available numbers in the 615 NPA.

9. On August 17, 2011, TCG submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" to NeuStar for a thousand-block in the Gallatin rate center to satisfy the customer request. A copy of this application is attached as Exhibit B.

10. During the session via the Pooling Administration System ("PAS"), TCG received an error message instructing to "Return to the Months To Exhaust Form", the request would not process through the system without a state waiver. The error message is included in Exhibit B. NeuStar applies the FCC rules and INC Guidelines. Per Paragraphs 5 and 6, the rules require that a block holder requesting growth resources demonstrate that existing resources within the rate center will both exhaust within 6 months and meet the 75% utilization level. The error message indicated that neither threshold was met.

11. Although TCG has adequate telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, TCG's existing resources cannot satisfy this

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<sup>3</sup> The federal rules in 47 C.F.R. 52.15 generalize responsibilities of NANPA and the Pooling Administrator under the heading "Central office code administration".

customer's specific need. TCG holds only the 9 block in this rate center which does not conform to the customer's requirements.

12. As a result of the denial for additional numbering resources, TCG is unable to provide the telecommunications services requested by its customer.

13. In setting its policy for the assignment of telephone numbers, the FCC designated NANPA and NeuStar, as the Pooling Administrator, to handle numbering resource administration.<sup>4</sup> If a numbering resource administrator withholds numbering resources from a carrier, the FCC has specifically authorized state commissions to overturn those decisions for reasonable cause. That authority is specifically set out in the relevant FCC Rule, 47 C.F.R. §52.15 (g)(3)(iv), which states:

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an OCN. The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. **The state commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.**

The FCC also clarified in the FCC 00-249 Order that carriers may appeal to states using a "safety valve" mechanism.<sup>5</sup> The FCC contemplated the need for, and gave structure to states to

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<sup>4</sup> 47 C.F.R. § 52.15(a) states: "Central Office Code Administration shall be performed by the NANPA, or another entity or entities, as designated by the Commission." 47 C.F.R. § 52.20(d) states: "The Pooling Administrator shall be a non-governmental entity that is impartial and not aligned with any particular telecommunications industry segment, and shall comply with the same neutrality requirements that the NANPA is subject to under this part."

<sup>5</sup> See Paragraphs 57-66.

respond when denials failed to consider a “specific customer request”.

14. An essential aspect of the “safety valve” provision is the accelerated response that is provided for in the FCC’s order: States should act upon such a request in most instances in 10 business days, as noted by the FCC.

Finally, we recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier’s ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish a specific time limit for states to act on these requests, we believe that, in most instances, 10 business days from receipt of a request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests. If a state does not reach a decision on a safety valve request within a reasonable timeframe, carriers may submit such requests to the Commission for resolution. In addition, carriers may appeal to the Commission safety valve decisions made by states, and we delegate authority to the Common Carrier Bureau to review such petitions as expeditiously as possible.<sup>6</sup>

15. TCG seeks the Authority’s review of NeuStar’s decision to withhold resources from it on the grounds that it: (1) violates the orders and rules of the FCC which grant carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need and (2) interferes with TCG’s ability to serve its customer. As the FCC has stated, “Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”<sup>7</sup> By refusing to grant numbering resources to meet this customer’s needs, the decision prevents the customer from obtaining the service of its choice from its carrier of choice, TCG.

16. During the Authority Conference on September 12, 2011, Docket 11-00133, Mr

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<sup>6</sup> *Id.* at Paragraph 66.

<sup>7</sup> FCC 00-429 at Paragraph 61.

Brent Struthers with NeuStar, representing both the North American Numbering Plan Administrator and the Pooling Administrator, made the following statement:

For the record, I would like to state for this and all future safety valve requests that neither the North American Numbering Plan Administrator nor the Pooling Administrator objects or has any position on any safety valve requests ad infinitum, ad nauseam, etc., etc.

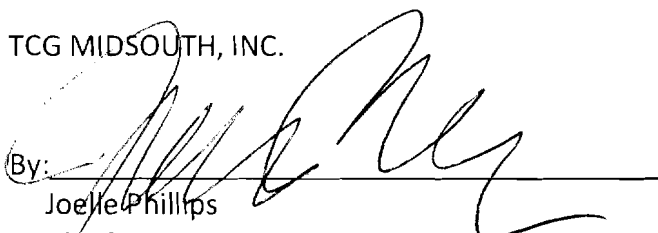
17. Included with this Petition is a draft approval order for the Authority's consideration.

**Relief Sought**

For these reasons, TCG respectfully requests the TRA expeditiously review NeuStar's decision denying TCG's request for additional numbering resources and order NeuStar to provide the requested numbers to meet the specific requirements of TCG's Gallatin customer.

Respectfully submitted,

TCG MIDSOUTH, INC.

By:   
Joelle Phillips  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
615 214-6311

# Exhibit A





**September 21, 2011**

**Rich Products Corporation  
349 W Main Street  
Gallatin, TN, 37066**

**AT&T Number Administration/Code Administration;**

This Letter of Intent represents a request by Rich Products for 50 numbers for Prime Service/LNS. Rich Products intends to order service, in the GALLATIN rate center, on the NSVLTN48DS0 switch pending AT&T's successful completion of the required testing. Rich Products intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

**Rich Products** currently has an existing network configuration and therefore technical restrictions exist in the following blocks

- Block 0 (0000-0999): \_conflicts with PBX. \_\_\_\_\_
- Block 1 (1000-1999): \_conflicts with PBX \_\_\_\_\_
- Block 2 (2000-2999): \_\_\_\_\_
- Block 3 (3000-3999): \_\_\_\_\_
- Block 4 (4000-4999): \_\_\_\_\_
- Block 5 (5000-5999): \_\_\_\_\_
- Block 6 (6000-6999): \_\_\_\_\_
- Block 7 (7000-7999): \_\_\_\_\_
- Block 8 (8000-8999): \_conflicts with PBX \_\_\_\_\_
- Block 9 (9000-9999): \_causing 911 problems with end users

Rich Products has additional growth at this site which requires an additional 50 DID numbers. Current numbers in the 9000 range that were provided by AT&T LNS are causing end user errors with callers dialing 911 by mistake which is another reason for new number request. PBX equipment cannot handle the 0000, 1000, or 8000 ranges; these ranges won't work with equipment.

Sincerely,

Jeff Schaefer

A handwritten signature in black ink, appearing to read "Jeff Schaefer", with a long, sweeping horizontal line extending to the right.

# Exhibit B

Part1A

Page 1 of 4

TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

Tracking  
Number: **615-GALLATIN-  
TN-471240**  
**Individual Block  
Request**

Type of  
Application: ☒ New ☐ Change ☐ Disconnect

**GENERAL APPLICATION INFORMATION****1.1 Contact Information:**Block Applicant:

Company  
Name: **TCG MIDSOUTH, INC. - TN**  
Headquarters  
Address: **One AT&T Way**  
City, State,  
Zip: **Bedminster, NJ, 07921**  
Contact  
Name: **Lisa Loper**  
Contact  
Address: **One AT&T Way**  
City, State, Zip: **Bedminster, NJ, 07921**  
Phone: **908- 234-7622** FAX: **908- 234-8044** E-mail: **lloper@att.com**

Pooling Administrator: <sup>ii</sup>

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 ☒ LRN needed <sup>iii</sup> ☐

Part 1A

Page 2 of 4

NPA: 615 LATA: 470 OCN: <sup>iv</sup> 114F Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
NSVLTN48DS0

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup>  
GALLATIN

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

### 1.3 Dates:

Date of Application: <sup>vii</sup> 08/17/2011 Requested Block Effective Date: <sup>viii</sup>  
09/17/2011

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 : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) \_\_\_\_\_
- 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 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 <sup>ix</sup> | Switching Id | Part 1B

Part 1A

Page 3 of 4

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.

Lisa Loper

Signature of Block Applicant

Manager-Code 08/17/2011  
Administration

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>xi</sup>. Explanations of these terms may be found in the footnotes.

MTE Block

Page 1 of 2

Appendix 3

May 16, 2008

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>**  
**(Thousands-Block Number Pooling Growth Block Request)**

Tracking Number: 615-GALLATIN-TN-471240Date: 08/17/2011OCN: 114FCompany Name: TCG MIDSOUTH, INC. - TNRate Center: GALLATINList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 615-989-9Name of Block Applicant: Lisa LoperSignature: Lisa LoperTitle: Manager-Code AdministrationTelephone No.: 908-234-7622FAX No.: 908-234-8044E-mail: lloper@att.comA. Available Numbers: 759B. Assigned Numbers: 234C. Total Numbering Resources: 1000D. 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>: 0

List  
Excluded  
Code(s) or  
Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
--	----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth  
History -  
Previous 6  
months<sup>3</sup>

	<u>2</u>	<u>-1</u>	<u>0</u>	<u>0</u>	<u>-2</u>	<u>0</u>
--	----------	-----------	----------	----------	-----------	----------

MTE Block

Page 2 of 2

F. Forecast

- Next 12 months<sup>4</sup>      50      1      1      -1      1      1      0      0      0      -1      0      0

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 8.833

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

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

759

Months To Exhaust

85.928

I.

Utilization<sup>6</sup> =  $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{23.4}$

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))

# Exhibit C



Part3

Page 1 of 2

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 615-GALLATIN-TN-471240

Date of Application: 08/17/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 08/17/2011 Date of Response: 08/17/2011

Service Provider Name: TCG MIDSOUTH, INC. - TN  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 114F

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> NSVLTN40DS0  
Rate Center: GALLATIN  
Rate Center Sub Zone: \_\_\_\_\_

☒ **Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new 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:

Part3

Page 2 of 2

**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™ 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.)

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

**IN RE:**

**REQUEST OF TCG MIDSOUTH, INC., FOR EXPEDITED  
REVIEW OF CENTRAL OFFICE CODE DENIAL  
Rich Products Corporation**

)  
)  
)  
)  
)

**DOCKET NO.**

\_\_\_\_\_

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**ORDER APPROVING REQUEST OF TCG MIDSOUTH, INC., FOR EXPEDITED REVIEW OF  
GROWTH CODE DENIAL AND REVERSING CENTRAL OFFICE CODE DENIAL**

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This matter came before the Tennessee Regulatory Authority ("TRA" or the "Authority for consideration of the *Petition for Expedited Review of Central Office Code Denial* filed by TCG MidSouth, Inc., ("TCG"). After consideration of the facts contained in the record and the applicable law, TRA approves the request of TCG and reverses the Pooling Administrator's denial of TCG's request for additional numbering resources.

**IT IS THEREFORE ORDERED THAT:**

1. The Pooling Administrator's decision to deny TCG MidSouth, Inc.'s request for additional numbering resources is reversed as stated herein.
2. The Pooling Administrator is ordered to assigned request for the Gallatin Rate Center served by Switch Identification No. NSVLTN48DS0.

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Chairman Kenneth Hill

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Director Sara Kyle

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Director Mary W. Freeman

### CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2011, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Ms. Beth Sprague, Regional Director  
NANPA Code Administration  
46000 Center Oak Plaza  
Sterling, VA 20166  
[Beth.sprague@neustar.biz](mailto:Beth.sprague@neustar.biz)

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