



Joelle Phillips  
General Attorney - TN

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October 26, 2012

VIA HAND DELIVERY

Earl Taylor, Executive Director  
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 State Auto Insurance Companies*  
Docket No 12-00128

Dear Director Taylor:

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,

Joelle J. Phillips

A large, stylized handwritten signature in black ink, appearing to read "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 Relating to State Auto Insurance Companies*

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

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

BellSouth Telecommunications, LLC, 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 Goodlettsville 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 October 25, 2012, 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 400 contiguous numbers necessary to meet the demands of its customer, State Auto Insurance Companies ("State Auto"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 400 contiguous numbers in the 615 NPA area code, in response to State Auto's request for 400 contiguous numbers in the 6000 - 6400 range. State Auto cited a new telephone system installation as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Goodlettsville rate center, and, accordingly, AT&T Tennessee was unable to provide State Auto 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 Goodlettsville rate center had an MTE of approximately 18 months.

11. Despite the fact that AT&T Tennessee's Goodlettsville rate center may not exhaust for 18 months, AT&T Tennessee is unable to provide the requested service through its switch that serves State Auto within the Goodlettsville rate center. This is because the individual switch that serves this customer within the Goodlettsville rate center does not have sufficient number resources to meet the customer's request.

12. On or about October 25, 2012, 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 State Auto 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 2012-1 NRUF and NPA Exhaust Analysis dated April 2012, the projected exhaust

date of the 615 NPA is the 2Q 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 Goodlettsville, including the GDVLTNMARS0 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 State Auto 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 State Auto'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 State Auto's needs, the NeuStar is preventing State Auto 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.

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

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

### **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 State Auto in order that State Auto may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, AT&T Tennessee requests:

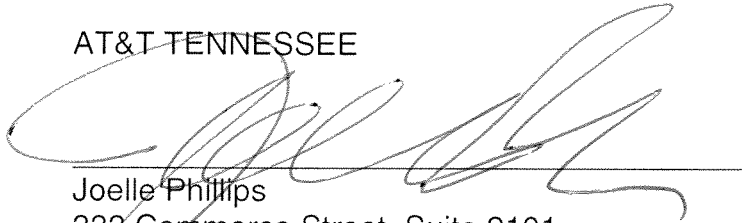
1. The Authority review the decision of NeuStar to deny AT&T Tennessee's request for additional numbering resources; and



2. The Authority direct NeuStar to provide numbers to AT&T Tennessee to meet the specific requirements of State Auto in the Goodlettsville rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, stylized handwritten signature in black ink, appearing to read 'Joelle Phillips', is written over a horizontal line.

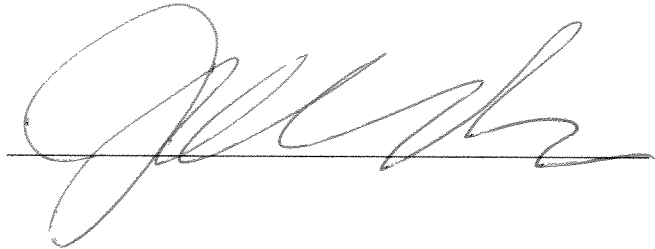
Joelle Phillips  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6311

### CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2012, 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](mailto:Beth.sprague@neustar.biz)

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

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

**IN RE:**

**REQUEST OF AT&T TENNESSEE FOR EXPEDITED  
REVIEW OF CENTRAL OFFICE CODE DENIAL  
State Auto Insurance Companies**

)  
)  
)  
)  
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**DOCKET NO.**

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**ORDER APPROVING REQUEST OF AT&T TENNESSEE, 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 AT&T Tennessee ("AT&T"). After consideration of the facts contained in the record and the applicable law, TRA approves the request of AT&T and reverses the Pooling Administrator's denial of AT&T Tennessee's request for additional numbering resources.

**IT IS THEREFORE ORDERED THAT:**

1. The Pooling Administrator's decision to deny AT&T Tennessee's request for additional numbering resources is reversed as stated herein.
2. The Pooling Administrator is ordered to assigned request for the Goodlettsville Rate Center served by Switch Identification No. GDVLTNMARS0.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking  
Number: 615-  
GOODLETSVL-  
TN-581840  
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- FAX: 770-945- E-mail: rw0052@att.com  
945-9630 9630

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   X   LRN needed <sup>iii</sup>           

NPA:   615   LATA:   470   OCN: <sup>iv</sup>   9419   Parent Company's OCN   9400  

Number of Thousands-Blocks Requested :   1  

Switching Identification(Switch Entity/POI) : <sup>v</sup>   GDVLTNMARS0  

City or Wire Center Name :           

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

Rate Center Sub Zone:           

## 1.3 Dates:

Date of Application: <sup>vii</sup>   10/25/2012   Requested Block Effective Date: <sup>viii</sup>   11/25/2012  

☒ 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)   615-992-6
- 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

☐ 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 10/25/2012

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.

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. They 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



## Pooling Administration System

 rw0052@att.com (SP)

[Sign Out](#)

Time : 10/25/2012 03:24:17 PM EDT

Appendix 3

Printable Version  
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-GOODLETSVL-TN-581840

Date: 10/25/2012

OCN: 9419

Company Name: BELLSOUTH TELECOMM INC  
DBA SOUTH CENTRAL BELL TEL

Rate Center: GOODLETSVL

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

Name of Block Applicant: Rena Buttica

Signature: Rena Buttica

Title: Sr. Specialist

Telephone No.: 770-945-9630

FAX No.: 770-945-9630

E-mail: rw0052@att.com

A. Available Numbers: 8854

B. Assigned Numbers: 12300

C. Total Numbering Resources: 21535

D. 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	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	Mont h	

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

<u>119</u>	<u>1095</u>	<u>112</u>	<u>121</u>	<u>91</u>	<u>401</u>
------------	-------------	------------	------------	-----------	------------

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

<u>323</u>	<u>1323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>	<u>323</u>
------------	-------------	------------	------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 489.667

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

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<u>1</u>	<u>8854</u>	<u>18.082</u>

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

Assigned Numbers(B) - Excluded  
Numbers(D)

X 100 =  
57.116

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 : 10/25/2012 03:24:27 PM EDT

[Printable Version](#)

November 21, 2003  
ATIS-0300066.at3

Attachment 3

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

Tracking Number : 615-  
GOODLETSVL-  
TN-581840

Date of Application: 10/25/2012 Effective Date: \_\_\_\_\_  
Date of Receipt: 10/25/2012 Date of Response: 10/25/2012

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>

GDVLTNMARS0

Rate Center:

GOODLETSVL

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.)

July 30, 2012

Dean Kreuger  
Sales Account Manager  
ATT  
2180 Lake Blvd., 10D53  
Atlanta, GA 30319  
cc: Philip Petkoff  
Mary Edwards  
Cynthia Kealey

State Auto Insurance Companies is currently in the process of installing an enterprise telephony VoIP system in all of our offices and will be setting up all of our employees with direct inward dial phone numbers. We are now in the planning phase of installing this system in our office at 100 State Auto Blvd, Goodlettsville, TN 37072

Stat Auto is requesting 400 hundred DID numbers in a contiguous range. We are specifically requesting the last 4 digits are in the contiguous range of 6000 to 6400. This will match the last 4 digits that are currently in use and will allow our employees to make this transition with minimum disruption to the business unit.

We would like these numbers assigned as soon as possible. Please call me to discuss if you have any questions or issues that need to be addressed.

Sincerely,  
Stan Harris  
Telecommunication Engineer  
State Auto Insurance  
518 E. Broad St  
Columbus, Ohio 43215

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 dark 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)

