



Robert Culpepper  
General Attorney

AT&T Tennessee  
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August 26, 2013

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2013 AUG 26 PM 4:00  
T.R.A. DOCKET ROOM

**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 Relating to Hewlett-Packard Company*  
Docket No \_\_\_\_\_

Dear Chairman Roberson:

Enclosed are the original and four copies of Telecom Communications Of America  
LLC's *Petition for Expedited Review of Central Office Code Denial*. Copies of the enclosed  
are being provided to the Number Pooling Administrator.

Very truly yours,

*Robert Culpepper*  
Robert Culpepper  
*by Charlotte*  
*With Permission*

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

In Re:       *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Hewlett-Packard Company*

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

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

Teleport Communications of America, LLC ("TCAL"), 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 TCAL's application for use of central office code numbering resources in the 615 area code.

TCAL respectfully shows the Authority as follows:

1. TCAL is a telecommunications company providing intraLATA, local exchange telecommunications services in the Nashville 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. TCAL 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 16, 2013, TCAL 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 300 consecutive numbers necessary to meet the demands of its customer, Hewlett-Packard Company ("Hewlett-Packard"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for 300 consecutive numbers in the 615 NPA area code, in response to Hewlett-Packard's request for 300 consecutive

numbers in the XX00-XX99 range. Hewlett-Packard cited transformation of their voice network as its basis for this request. However, TCAL did not have sufficient number resources available within its inventory in the Nashville rate center, and, accordingly, TCAL was unable to provide Hewlett-Packard with sufficient numbers to meet its needs. For this reason, TCAL sought the numbering resources as noted above.

9. TCAL 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 Nashville rate center had an MTE of approximately 16 months.

11. Despite the fact that TCAL's Nashville rate center may not exhaust for 16 months, TCAL is unable to provide the requested service through its switch that serves Hewlett-Packard within the Nashville rate center. This is because the individual switch that serves this customer within the Nashville rate center does not have sufficient number resources to meet the customer's request.

12. On or about August 16, 2013, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that TCAL 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 TCAL 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. TCAL's inability to provide this large business customer with the requested numbers prevents TCAL from providing the quality of service this customer desires and expects. (Correspondence from Hewlett-Packard 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 2013-2 NRUF and NPA Exhaust Analysis dated April 2013, the projected exhaust date of the 615 NPA is the 2Q 2015. Therefore, granting TCAL'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 TCAL with numbering resources to meet the service requirements of the University of Tennessee, even though TCAL 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 TCAL provide additional information concerning number utilization for the specific central office involved in the request. This information for the Nashville rate center, including the NSVLTNWMWMD 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. TCAL believes that the Authority can more quickly address the numbering problem facing Hewlett-Packard and TCAL, and, because time is of the essence to the customer, TCAL 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 TCAL to meet Hewlett-Packard'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 Hewlett-Packard's needs, the NeuStar is preventing Hewlett-Packard from obtaining the service of its choice from its carrier of choice, TCAL.

20. Notwithstanding customer need for a specific numbering arrangement, TCAL's analysis indicates that TCAL 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 TCAL'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, TCAL respectfully urges the Authority to direct NeuStar to provide the requested numbers to TCAL to enable TCAL to meet the specific requirements of Hewlett-Packard in order that Hewlett-Packard may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

WHEREFORE, TCAL requests:

1. The Authority review the decision of NeuStar to deny TCAL's request for additional numbering resources; and
2. The Authority direct NeuStar to provide numbers to TCAL to meet the specific requirements of Hewlett-Packard in the Nashville rate center within the 615 NPA.

Respectfully submitted,

Teleport Communications of America, LLC

By:

A handwritten signature in black ink, appearing to read "J. Richard Lodge", is written over a horizontal line.

J. Richard Lodge

Bass, Berry & Sims PLC

150 Third Avenue South, Suite 2800

Nashville, TN 37201

Telephone: 615/742-6254

TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

Tracking Number: 615-NASHVILLE-  
TN-667542

Individual Block  
Request

Type of Application:      New                      i                      Change                      Disconnect

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

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - 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@ncustar.biz

**1.2 General Information:**

Check one : No LRN needed   X   LRN needed <sup>iii</sup>

NPAC: 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>

NSVLTNWMWMD

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

Rate Center: <sup>vi</sup>

NASHVILLE

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

### 1.3 Dates:

Date of Application: <sup>vii</sup>

08/16/2013

Requested Block Effective Date: <sup>viii</sup>

09/16/2013

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) 615-416-6, 615-258-5

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 IB

OCN: Inter-company ^ Effective Date

Change block : Yes \_\_\_\_\_ If Yes, list NPA-XXX-X \_\_\_\_\_

**1.6 Block Return :**

- a) Is this block Contaminated Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many FNs are NOI 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-XXX-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 LoperManager-Code 08/16/2013  
Administration

Signature of Block Applicant

Title Date

**Instructions for filling out each Section of the Part IA 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 Telecordia<sup>TM</sup> EERC<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 Telecordia<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>1</sup>. Explanations of these terms may be found in the footnotes.

1. Spinal Cord

8006 91 504X

ALGORITHMS FOR EXHAUSTIVE OPTIMIZATION OF TRIPPLATION WORK SCHEDULES

(Thousands Block Numbering (North Block Request))

Tracking Number: 615-NASHVILLE-TN-667542

Company Name-REPORT COMMUNICATIONS

100 N 1145

08/16/2013

# THE NEW YORK PUBLIC LIBRARY

First all codes NPAs, NXXs and blocks NPAs-NXX-NXXs  
 615 514 0 615 514 1 615 514 2 615 514 3 615 514 4 615 514 5 615 514 6 615 514 7 615 514 8 615  
 514 9 615 718 A 615 750 A 615 750 0 615 750 1 615 750 4 615 750 6 615 750 7 615 750 8 615 750  
 9 615 986 A 615 986 0 615 986 1 615 986 2 615 986 3 615 986 4 615 986 5 615 986 6 615 986 7  
 615 986 9

Name of Block Applicant Lisa Lopez

Signature: Lisa Loper

## The Manager-Code Administration

Telephone No: 908-234-7622

**FD-302 (Rev. 11-27-70)**

~~Internet: www.fbi.com~~      100-1

62-104941-1

B. Assigned Numbers. 29185

(Total Numbering Resources: 36000)

From the diffusion calculation

Applied  
to  
the  
the  
the  
the

12/11/2011

44-38861-3

[illegible]

21. 112 016 61 89 22 90 51 10 11 12 13

11/11/11

distances were plotted against the corresponding average

History -  
 Previous 6 months<sup>2</sup>    -670    -414    -77    302    87    10145

F. Forecast  
 - Next 12 months<sup>3</sup>    1000    184    213    48    116    117    169    174    223    236    230    235

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 279.667

H. Months to Exhaust<sup>4</sup>    Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

4593

Months To Exhaust

16.423

I. Utilization<sup>6</sup>    Assigned Numbers(B) - Excluded Numbers (D) X 100  
81.069

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 (XXX-N) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 5.2.15 (g) (3) (iii)).

<sup>6</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00-104, section 5.2.15 (g) (3) (iii)).

November 21, 2003  
ATIS-0300066 at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : **615-NASHVILLE-  
TN-667542**

Date of Application **08/16/2013** Effective Date \_\_\_\_\_  
Date of Receipt **08/16/2013** Date of Response **08/16/2013**

Service Provider Name **TELEPORT COMMUNICATIONS AMERICA, LLC - TN**  
(Telcordia IM LERG IM **114F**  
Routing Guide ) OCN \_\_\_\_\_  
Parent Company OCN **7125**

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) \_\_\_\_\_

**NSVLTNWMWMD**

Rate Center \_\_\_\_\_

**NASHVILLE**

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:

\_\_\_\_ Assignment activity suspended by the administrator.

Explanation:

Remarks:

\* 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.)



Hewlett-Packard Company  
15555 Cullen Road  
Houston, TX 77070

Exhibit D

August 14, 2013

Hewlett-Packard Company  
3000 Hanover Street  
Palo Alto, CA 94304

AT&T Number Administration/Code Administration;

This Letter of Intent represents a request by Hewlett-Packard Company for (300) TNs for AT&T BVOIP Services. Hewlett-Packard Company intends to order service, in the Nashville, TN (NASHVILLE) rate center, on the STLSMO09GT3(P) switch pending AT&T's successful completion of the required testing. Hewlett-Packard Company intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

Hewlett-Packard Company currently has an existing network configuration and therefore technical restrictions exist in the following blocks:

Block 0 (0000-0999): Require contiguous numbers starting with XX00 ending with XX99  
Block 1 (1000-1999): Require contiguous numbers starting with XX00 ending with XX99  
Block 2 (2000-2999): Require contiguous numbers starting with XX00 ending with XX99  
Block 3 (3000-3999): Require contiguous numbers starting with XX00 ending with XX99  
Block 4 (4000-4999): Require contiguous numbers starting with XX00 ending with XX99  
Block 5 (5000-5999): Require contiguous numbers starting with XX00 ending with XX99  
Block 6 (6000-6999): Require contiguous numbers starting with XX00 ending with XX99  
Block 7 (7000-7999): Require contiguous numbers starting with XX00 ending with XX99  
Block 8 (8000-8999): Require contiguous numbers starting with XX00 ending with XX99  
Block 9 (9000-9999): Require contiguous numbers starting with XX00 ending with XX99

Hewlett-Packard Company is currently transforming their voice network to a Unified IP configuration; Therefore, Hewlett-Packard Company requires significant telephone numbers to transform the existing network, and anticipates growth within the next 18-24 months for an additional 50,000 telephone numbers for this new unified voices service configuration. Hewlett-Packard Company has multiple sites within the state of Tennessee, which will be integrated into this new unified voice network configuration.

Hewlett-Packard Company (HP) is one of the world's largest IT Companies servicing more than one billion customers in more than 170 countries on six continents. HP has approximately 400,000 employees worldwide.

Sincerely,

Angela Quigley

Voice Services Manager

## TENNESSEE REGULATORY AUTHORITY

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



460 James Robertson Parkway  
Nashville, Tennessee 37243-0905

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)

**Nashville Rate Center**  
**Teleport Communications of America, LLC**

<b>NPA-NXX</b>	<b>X</b>	<b>Available Numbers</b>	<b>Assigned Numbers</b>	<b>Total Number Resources</b>	<b>Utilization</b>
615-718	0	0	1,000	1,000	100.000%
615-718	1	0	1,000	1,000	100.000%
615-718	2	0	1,000	1,000	100.000%
615-718	3	0	1,000	1,000	100.000%
615-718	4	0	1,000	1,000	100.000%
615-718	5	0	1,000	1,000	100.000%
615-718	6	0	1,000	1,000	100.000%
615-718	7	0	1,000	1,000	100.000%
615-718	8	0	1,000	1,000	100.000%
615-718	9	1	999	1,000	99.900%
615-750	0	0	904	1,000	90.400%
615-750	1	29	861	1,000	86.100%
615-750	4	0	1,000	1,000	100.000%
615-750	6	0	1,000	1,000	100.000%
615-750	7	0	1,000	1,000	100.000%
615-750	8	187	766	1,000	76.600%
615-750	9	17	904	1,000	90.400%
615-986	0	558	412	1,000	41.200%
615-986	1	496	452	1,000	45.200%
615-986	2	319	672	1,000	67.200%
615-986	3	378	520	1,000	52.000%
615-986	4	383	617	1,000	61.700%
615-986	5	0	975	1,000	97.500%
615-986	6	0	884	1,000	88.400%
615-986	7	127	721	1,000	72.100%
615-986	9	277	637	1,000	63.700%

<b>TOTALS:</b>		2,772	22,324	26,000	81.069%
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**REQUEST OF TCAL FOR EXPEDITED  
REVIEW OF CENTRAL OFFICE CODE DENIAL  
Hewlett-Packard Company**

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**DOCKET NO.**

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**ORDER APPROVING REQUEST OF TCAL, 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 TCAL ("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 TCAL's request for additional numbering resources.

**IT IS THEREFORE ORDERED THAT:**

1. The Pooling Administrator's decision to deny TCAL's request for additional numbering resources is reversed as stated herein.
2. The Pooling Administrator is ordered to assigned request for the Nashville Rate Center served by Switch Identification No. NSVLTNWMWMD.


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**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2013, 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

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Handwritten signature of Carolyn L. Sprague, written over a horizontal line.