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November 10, 2014

Hon. Herbert Hilliard, Chairman
Tennessee Regulatory Authority
502 Deaderick Street
Nashville, TN 37238

Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling
Administrator Relating to University Health Systems, Inc.*
Docket No. 14-00130

Dear Chairman Hilliard:

Enclosed are an original and four copies of AT&T Tennessee's *Petition for Expedited
Review of Growth Code Denial*.

Very truly yours,

GLANKLER BROWN, PLLC

A handwritten signature in dark ink, appearing to read "Louis F. Allen", with a stylized flourish at the end.

Louis F. Allen

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University Health Systems, Inc.*

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 Federal Communications Commission ("FCC") for challenging number determinations, petitions the Tennessee Regulatory Authority (the "Authority") for review of a recent denial of AT&T Tennessee's application for use of central office code numbering resources in the 865 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"¹ and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Authority to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T Tennessee's customer, University Health Systems, Inc. ("University Health").

¹ See, e.g., 47 C.F.R. § 52.15.

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("Third NRO Order").

In support of this Petition, AT&T Tennessee states:

1. AT&T Tennessee is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of Tennessee, including the Sevierville Rate Center.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC 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. The FCC reaffirmed this requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the

³ See C.F.R. § 52.13(a), (b).

⁴ See C.F.R. § 52.7(g) ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

⁶ See 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, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶129 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about October 28, 2014, AT&T Tennessee submitted a Central Office Code (NXX) Assignment Request - Part 1,⁹ and the CO Code Assignment - Months to Exhaust Certification Worksheet,¹⁰ for the assignment of 200 consecutive DID numbers necessary to meet the demands of its customer.

8. The code assignment request was for 200 consecutive DID numbers in the 865 NPA area code, in response to University Health's request for 200 consecutive DID numbers in the same block. University Health cited business growth as its basis for this request. As AT&T Tennessee did not have the existing numbers to meet its customer's request, AT&T Tennessee is requesting that the numbers be assigned to it.

9. AT&T Tennessee's application was completed in accordance with Industry Number Committee ("INC") guidelines, and AT&T Tennessee filled out the necessary Months to Exhaust Certification Worksheet required. In reviewing previous petitions of this type, the

⁷ See *Second NRO Order* at ¶¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

¹⁰ See Exhibit B to this Petition.

Authority 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 Sevierville rate center, including the SVVLTNMTDSO Central Office is attached hereto as Exhibit "C."

10. At the time of the code request, the Sevierville rate center had an MTE of approximately 196 months.¹¹

11. Thereafter, on or about October 28, 2014, AT&T Tennessee's request was denied because AT&T Tennessee had not met the rate center-based months-to-exhaust criteria now set forth in the INC Guidelines.¹² AT&T Tennessee's numbering resource requests were denied despite the fact that AT&T Tennessee does not have adequate numbering resources needed to satisfy this customer's demands.¹³

12. 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.¹⁴ If AT&T Tennessee is not assigned the numbering resources needed to meet the customer's request, AT&T Tennessee will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving

¹¹ See *Id.*

¹² See *Id.*

¹³ See Exhibit D to this Petition.

¹⁴ Correspondence from University Health is attached as Exhibit E.

telecommunications services of their choice from providers of their choice for want of numbering resources.”¹⁵

13. Relief for the 865 NPA was implemented with the start of mandatory dialing on November 1, 1999. The Authority also ordered thousands-block pooling for the 865 NPA with a Pool Start Date of August 21, 2002. According to NeuStar, based on the 2014-2 NRUF and NPA Exhaust Analysis dated October 2014, the projected exhaust date of the 865 NPA is the 4Q 2035. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 865 NPA.

14. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁶

15. The Authority and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and South Carolina similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T Tennessee to meet customer needs.¹⁷

16. Neither NANPA nor the PA object to Authority approval of the request herein. 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:

¹⁵ *Second NRO Order* at ¶ 61.

¹⁶ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“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”).

¹⁷ See *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University of Tennessee - Chattanooga*, Docket No. 01-00957 (approved November 20, 2001).

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.

WHEREFORE, AT&T Tennessee requests that the Authority:

1. Reverse the decision to deny AT&T Tennessee's request for additional numbering resources;
2. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide numbers to AT&T Tennessee to meet the specific requirements of University Health in the Sevierville rate center within the 865 area code; and
3. Grant the requested relief as soon as possible.

Respectfully submitted,

GLANKLER BROWN

BY: 
Louis F. Allen (TN BPR #8783)
6000 Poplar Avenue, Suite 400
Memphis, TN 38119
(901) 525-1322
Attorneys for AT&T Tennessee

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:

REQUEST OF AT&T TENNESSEE FOR EXPEDITED
REVIEW OF CENTRAL OFFICE CODE DENIAL
University Health Systems, Inc.

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)
)

DOCKET NO.

ORDER APPROVING REQUEST OF AT&T TENNESSEE, FOR EXPEDITED REVIEW OF GROWTH
CODE DENIAL AND REVERSING CENTRAL OFFICE CODE DENIAL

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 Sevierville Rate Center served by Switch Identification No. SVVLTNMTDS0.

Pooling Administration System

rw0052@att.com (SP)

Sign Out

Time: 10/28/2014 05:12:23 PM EDT

Printable Version

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 865-
SEVIERVL-
TN-773934
Individual
Block
Request

Type of
Application: ☒ New ☐ Change ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL
BELL TEL
Headquarters Address: 500 Broad St SE
City, State, Zip: Gainesville, GA, 30501
Contact Name: Rena Buttica
Contact Address: 500 Broad St SE
City, State, Zip: Gainesville, GA, 30501
Phone: 770-945-9630 FAX: 770- E-mail: rw0052@att.com
945-9630

Pooling Administrator:

Contact Name: Genevieve Bettiga
Contact Address: 1800 Sutter St
City, State, Zip: Concord, CA, 94520
Phone: 925-363-7652 FAX: 925-363-7683
E-mail: genevieve.bettiga@neustar.biz

1.2 General Information:

Check one : No LRN needed ☒ LRN needed ☐

NPA 865 DATA 474 OCN 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1
Switching Identification(Switch Entity/POI) : SVVLTNMTDS0
City or Wire Center Name : _____ Rate Center : SEVIERVL
Rate Center Sub Zone : _____

1.3 Dates:

Date of Application: 10/28/2014 Requested Block Effective Date: 11/28/2014

☐ 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) _____
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 ☐ Switching Id ☐ Part 18
☐ OCN Inter-company ☐ 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 as of the date of this application

Rena Buttica

Signature of Block Applicant

Sr.
Specialist 10/28/2014
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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based provider. 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 those 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

Identify the type of change(s) in Section 1.5

The Pool Administrator is available to assist in completing these forms

A CO Code application will also need to be submitted to the PA

* 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).

* 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™ code of the switch /POI.

* Rate Center name must be a tariffed Rate Center

* 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.

** 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).

* Select if you are the current Block Holder.

* Select if you are not the current Block Holder

* Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

[Back]

Pooling Administration System

rw0052@att.com (SP)

Sign Out

Time: 10/28/2014 05:13:07 PM EDT

Printable Version:

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level 1

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 865-SEVIERVL-TN-773934

Date: 10/28/2014

OCN: 9419

Company Name: BELLSOUTH TELECOMM
INC DBA SOUTH CENTRAL BELL TEL

Rate Center: SEVIERVL

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 15071

B. Assigned Numbers 22278

C. Total Numbering Resources 39478

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation = 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		

E. Growth
History - 73 3 42 59 36 -32

Previous 6
months⁵

F

Forecast -
Next 12
months⁶

30 1030 30 30 30 30 30 30 30 30 30 30

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 196.667

H. Months
to
Exhaust⁷
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

15071

Months To Exhaust

76.632

I.
Utilization⁸
=

Assigned Numbers(B) - Excluded
Numbers(D)

X 100 =
56.431

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

Explanation: _____

⁵ 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.

⁶ 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=1,000).

⁷ 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.

⁸ Forecast 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 00-104, section 52.15 (g)(3)(ii)).

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Sevierville Rate Center AT&T Tennessee					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-286	6	152	457	644	70.963%
865-428	0	194	394	646	60.991%
865-428	1	188	403	680	59.265%
865-428	2	250	356	674	52.819%
865-428	3	272	378	733	51.569%
865-428	4	309	356	715	49.790%
865-428	5	257	354	686	51.603%
865-428	6	265	347	681	50.954%
865-428	7	286	341	707	48.232%
865-428	8	204	329	593	55.481%
865-428	9	151	229	432	53.009%
865-429	0	269	348	661	52.648%
865-429	1	296	362	719	50.348%
865-429	2	259	334	719	46.453%
865-429	3	351	317	735	43.129%
865-429	4	312	353	743	47.510%
865-429	5	280	338	709	47.673%
865-429	6	254	472	772	61.140%
865-429	7	160	281	487	57.700%
865-429	8	334	363	752	48.271%
865-429	9	137	482	678	71.091%
865-446	6	0	1,000	1,000	100.000%
865-446	7	0	999	999	100.000%
865-446	8	0	1,000	1,000	100.000%
865-446	9	0	992	992	100.000%
865-453	0	160	418	655	63.817%
865-453	1	188	383	637	60.126%
865-453	2	212	367	653	56.202%
865-453	3	230	382	659	57.967%
865-453	4	204	399	653	61.103%
865-453	5	202	392	653	60.031%
865-453	6	227	394	672	58.631%
865-453	7	202	426	672	63.393%
865-453	8	231	381	672	56.696%
865-453	9	257	360	684	52.632%
865-774	0	320	377	765	49.281%
865-774	1	319	314	693	45.310%
865-774	2	383	356	786	45.293%

Sevierville Rate Center AT&T Tennessee					
NPA-NXX	X	Available Numbers	Assigned Numbers	Total Number Resources	Utilization
865-774	3	224	398	667	59.670%
865-774	4	279	424	772	54.922%
865-774	5	351	357	748	47.727%
865-774	6	310	392	767	51.108%
865-774	7	303	385	746	51.609%
865-774	8	318	406	787	51.588%
865-774	9	370	347	770	45.065%
865-908	0	273	419	758	55.277%
865-908	1	298	259	602	43.023%
865-908	2	335	299	680	43.971%
865-908	3	317	333	731	45.554%
865-908	4	402	317	770	41.169%
865-908	5	325	231	604	38.245%
865-908	6	407	292	774	37.726%
865-908	7	564	201	788	25.508%
865-908	8	359	351	752	46.676%
865-908	9	322	332	750	44.267%
Totals:		14,072	22,277	39,477	56.431%

Pooling Administration System

 rw0052@att.com (SP)

[Sign Out](#)

Time : 10/28/2014 05:11:26 PM EDT

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)

Your Utilization calculates to 56.431%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Need to request a State Waiver
- ☐ Received a State Waiver
- ☐ Over-Contaminated Block Exception

[\[Submit\]](#) [\[Cancel\]](#)

neustar

Question? [Click Here](#)
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Petition of AT&T Tennessee
University Health System, Inc.
Exhibit E



University Health System, Inc.
Information Systems
9000 Executive Park Drive
Building D, Suite 100
Knoxville, TN 37923-4652
Main: (865) 251-4500
FAX: (865) 251-4525

August 19, 2014

Leah Harrison
Service Consultant
AT&T Business Solutions-Customer Care
AT&T Services Inc
Phone 704-733-1524
Email: lh1218@att.com
South East: ATTSECP2@RDSMAIL.IMS.ATT.COM

Dear Leah,

This is a request for 200 consecutive DID's in the same office code for our new Sevierville building.
Thanks for your assistance with this.

Sincerely,

Eileen Clark
Vice President and Chief Information Officer
Information Services
UT Medical Center

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2014, 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

Carolyn Mansueth