

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

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Metropolitan Nashville Airport Authority*
Docket No. 16-00065

PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL

BellSouth Telecommunications, LLC, d/b/a 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 629 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, Metropolitan Nashville Airport Authority ("Metropolitan Nashville Airport").

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

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").

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 Nashville 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 (6) 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 (6) 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 ¶29 (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 sixty (60%) percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent (5%) per year, and it has now reached the maximum of seventy-five (75%) percent. Based on the FCC's Orders, carriers must meet both the six (6) months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about April 27, 2016, 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 two (2) blocks of 1000 phone numbers necessary to meet the demands of its customer.

8. The code assignment request was for new area code 629 with a number range of 629-262-XXXX to XXXX (no 8XXX, 9XXX or 0XXX) in the 629 Number Plan Area ("NPA") or area code in response to Metropolitan Nashville Airport's request for two (2) blocks of 1000 phone numbers. AT&T Tennessee is requesting that the numbers in the 629 NPA 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 Nashville rate center, including the NSVLTNAARS5 Central Office is attached hereto as Exhibit "C."

10. At the time of the code request, the Nashville rate center had an MTE of approximately 64.47 months. The new 629 NPA does not have a projected MTE at this time.¹¹

11. Thereafter, on or about May 2, 2016, 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.

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.¹³ 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 telecommunications services of their choice from providers of their choice for want of numbering resources."¹⁴

¹¹ See *Id.*

¹² See *Id.*

¹³ Correspondence from Metropolitan Nashville Airport is attached as Exhibit "E".

¹⁴ Second NRO Order at ¶ 61.

13. Relief for the 615 NPA was implemented with the start of mandatory dialing in the 629 NPA on February 28, 2015. (Authority has not ordered pooling in 629 NPA-PTS). According to NeuStar, based on the 2015-2 NRUF and NPA Exhaust Analysis dated October, 2015, the projected exhaust date of the 629 NPA has not been established. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 629 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.¹⁵

15. The Authority and other state regulatory agencies in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, 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.¹⁶

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:

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

¹⁵ 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").

¹⁶ 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).

position on any safety valve requests ad infinitum, ad nauseam, etc., etc.

17. Included with this Petition is a proposed order of approval 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 two (2) 1000 blocks of numbers to AT&T Tennessee to meet the specific requirements of Metropolitan Airport Authority in the Nashville rate center within the 629 area code; and
3. Grant the requested relief as soon as possible.

Respectfully submitted,

GULLETT, SANFORD, ROBINSON & MARTIN

BY: 

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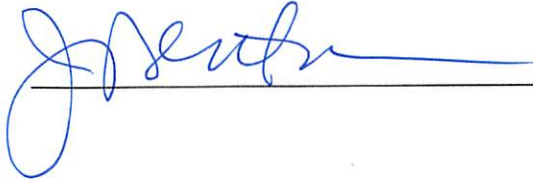
1152789

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2016 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. Genevieve Bettiga
NeuStar/NANPA
1800 Sutter Street
Concord, CA 94520
genevieve.bettiga@neustar.biz



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

IN RE:

**REQUEST OF AT&T TENNESSEE FOR EXPEDITED
REVIEW OF CENTRAL OFFICE CODE DENIAL
METROPOLITAN NASHVILLE AIRPORT AUTHORITY**

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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 assign two (2) 1000 blocks of numbers as requested for the Nashville Rate Center served by Switch Identification No. NSVLTNAARS5.

Metro Nashville AA

EXHIBIT A

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Apr 27, 2016

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TNAC

TN WEB FORMS

[Search Page](#) [Centrex Form](#) [Non-Centrex Form](#) [Complex - LSC Form](#) [MTNR Form](#) [LF4904 Form](#)[Non-Centrex Form Instructions](#)

Non Centrex Request Form

Date	<input type="text" value="04/27/2016"/>	Requestor Name	<input type="text" value="TRUDY WESTON"/>	Requestor Contact TN:	<input type="text" value="954"/> <input type="text" value="838"/> <input type="text" value="1465"/> Ext: <input type="text" value="1784"/>
State	<input type="text" value="TN"/>	Requestor Email	<input type="text" value="tw8625@att.com"/>		
Service Order Nbr:	<input type="text" value="c9000000"/>	Switch Type	<input type="text" value="DMS100"/>	<input type="radio"/> New <input checked="" type="radio"/> Existing	Main Account Number:
Due Date: <input type="text" value="05"/> <input type="text" value="01"/> <input type="text" value="2016"/>					<input type="text" value="615"/> <input type="text" value="275"/> <input type="text" value="4529"/>
(MM - DD - YYYY)				Customer Name	<input type="text" value="Metropolitan Nashville Airport"/>
Dialing Plan:		CLLI	<input type="text" value="NSVLTNAARS"/>		
DID <input checked="" type="checkbox"/>		Wire Center	<input type="text" value="615275"/>		
PRI <input type="checkbox"/>		NPANXX	<input type="text"/>		

Note: Minimum 1 field is required to submit form.

Miscellaneous, Specifications or Restrictions:

Please see the attached request for 2,000 consecutive numbers issued with the new area code, 629. The starting number of the range cannot start with an 8XXX, 9XXX, or 0XXX. Our preference is to have the prefix of 262; for

(Maximum characters allowed: 4000) You have characters left

List Telephone Numbers - Add

Section A: Number Range(consecutive numbers)	Quantity Requested:	<input type="text"/>
TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		
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Additional TNs:

(Maximum characters allowed: 4000) You have characters left

Section B: Number Range (Non-Consecutive Numbers) Quantity Requested: Quantity Requested:

TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		
TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> TN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		

Additional TNs:

(Maximum characters allowed: 4000) You have characters left

TNAC Reasons (if requested TNs are not available / TNAC Comments)

Metro Nashville AA

EXHIBIT A

Page 2 of 2

(Maximum characters allowed:4000) You have 4000 characters left.

List Telephone Numbers - Remove

Section C: Number Range(consecutive numbers)

TN					TN					TN					TN					TN				
TN					TN					TN					TN					TN				

Additional TNs:

^
v

(Maximum characters allowed:4000) You have 4000 characters left.

Section D: Number Range(Non-Consecutive Numbers)

TN					TN					TN					TN					TN				
TN					TN					TN					TN					TN				

Additional TNs:

^
v

(Maximum characters allowed:4000) You have 4000 characters left.

TNAC Specialist: pa6310@att.com TN: 888 - 509 - 9399 Response Date: 04 - 27 - 2016

Attachment: Browse...

(Max size: 4KB)

(Please upload attachment in .txt format)

Submit

Update

Pooling Administration System

[Sign Out](#)☒ rw0052@att.com (SP)

Time : 05/02/2016 11:45:07 AM EDT

[Printable Version](#)

Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 629-NASHVILLE-TN-918107Date: Monday, May
2, 2016 OCN: 9419Company Name: BELLSOUTH TELECOMM INC DBA
SOUTH CENTRAL BELL TELRate Center: NASHVILLE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 615 214 A 615 372 2 615 372 3 615 372 5 615 372 6 615 372 7 615 372 8 615 373 A 615 376 A 615 377 A 615 507 A 615 507 1 615 507 2 615 507 3 615 507 6 615 507 7 615 741 A 615 742 A 615 743 A 615 743 0 615 743 1 615 743 2 615 743 3 615 743 4 615 743 6 615 743 7 615 743 8 615 743 9 615 744 A 615 865 A 615 868 A 615 870 A 615 870 0 615 870 1 615 870 3 615 870 5 615 871 A 615 871 0 615 871 1 615 871 2 615 871 4 615 871 5 615 221 A 615 222 A 615 226 A 615 226 A 615 227 A 615 227 A 615 228 A 615 228 A 615 383 A 615 385 A 615 386 A 615 646 A 615 747 A 615 748 A 615 749 A 615 871 6 615 871 7 615 871 8 615 871 9 615 872 A 615 874 A 615 875 A 615 876 A 615 231 A 615 232 A 615 232 0 615 232 1 615 232 2 615 232 3 615 232 5 615 232 6 615 232 7 615 232 8 615 232 9 615 391 A 615 524 A 615 524 3 615 524 4 615 524 5 615 524 7 615 650 A 615 650 A 615 880 A 615 880 1 615 880 2 615 880 3 615 880 4 615 880 5 615 880 6 615 880 7 615 880 8 615 880 9 615 882 A 615 883 A 615 884 A 615 885 A 615 886 A 615 886 1 615 886 2 615 886 3 615 886 4 615 886 5 615 886 6 615 886 7 615 886 9 615 242 A 615 244 A 615 399 A 615 401 A 615 401 0 615 401 1 615 401 2 615 401 3 615 401 4 615 401 5 615 401 6 615 532 A 615 660 A 615 660 0 615 660 1 615 660 2 615 761 A 615 761 1 615 761 2 615 761 3 615 762 A 615 889 A 615 248 A 615 251 A 615 252 A 615 253 A 615 254 A 615 255 A 615 256 A 615 258 A 615 258 0 615 258 0 615 258 1 615 258 1 615 258 2 615 258 2 615 258 3 615 258 3 615 258 4 615 401 7 615 401 8 615 660 3 615 660 4 615 660 5 615 660 6 615 660 7 615 660 8 615 660 9 615 661 A 615 662 A 615 664 A 615 665 A 615 769 A 615 769 0 615 769 1 615 769 2 615 769 3 615 769 4 615 769 5 615 769 7 615 769 8 615 769 9 615 770 A 615 902 A 615 258 4 615 258 6 615 258 6 615 258 7 615 258 8 615 258 8 615 258 9 615 258 9 615 259 A 615 262 A 615 262 A 615 416 A 615 416 7 615 416 8 615 421 A 615 673 A 615 673 0 615 673 1 615 673 2 615 673 3 615 673 6 615 673 7 615 673 8 615 673 9 615 780 A 615 781 A 615 782 A 615 783 A 615 269 A 615 271 A 615 275 A 615 275 0 615 275 1 615 275 2 615 275 3 615 275 4 615 279 A 615 432 A 615 432 1 615 432 3 615 432 6 615 432 7 615 432 8 615 432 9 615 795 A 615 919 6 615 919 7 615 919 8 615 920 7 615 920 8 615 284 A 615 291 A 615 292 A 615 574 A 615 687 A 615 297 A 615 298 A 615 299 A 615 299 0 615 299 1 615 299 2 615 299 3

615 299 4 615 299 5 615 299 8 615 299 9 615 445 A 615 445 1 615 445 2 615 445 3 615 445 4 615 445 7 615 445 8 615 309 A 615 313 A 615 315 A 615 315 0 615 315 2 615 315 3 615 315 4 615 315 5 615 315 6 615 315 7 615 315 8 615 315 9 615 316 A 615 457 A 615 936 A 615 937 A 615 320 A 615 320 0 615 320 1 615 320 3 615 320 4 615 320 5 615 320 6 615 320 7 615 320 8 615 320 9 615 321 A 615 322 A 615 327 A 615 457 5 615 457 6 615 458 A 615 460 A 615 463 A 615 329 A 615 331 A 615 332 A 615 332 0 615 332 3 615 332 6 615 332 7 615 332 8 615 332 9 615 333 A 615 335 A 615 335 8 615 612 A 615 612 0 615 612 1 615 612 2 615 612 3 615 612 4 615 612 5 615 612 6 615 612 7 615 717 A 615 717 0 615 717 1 615 717 2 615 717 3 615 717 6 615 717 9 615 831 A 615 832 A 615 833 A 615 834 A 615 835 A 615 835 0 615 835 1 615 835 4 615 835 5 615 835 6 615 835 7 615 835 8 615 835 9 615 837 A 615 340 A 615 340 0 615 340 1 615 340 2 615 340 3 615 340 4 615 340 5 615 340 7 615 340 8 615 340 9 615 341 A 615 342 A 615 342 0 615 342 1 615 342 2 615 342 3 615 342 4 615 342 5 615 342 6 615 342 7 615 342 8 615 963 A 615 343 A 615 344 A 615 350 A 615 350 0 615 350 1 615 350 2 615 350 3 615 350 4 615 350 5 615 350 6 615 350 7 615 350 8 615 350 9 615 352 A 615 353 A 615 354 A 615 354 0 615 354 1 615 726 A 615 731 A 615 354 5 615 354 6 615 354 8 615 354 9 615 356 A 615 360 A 615 361 A 615 365 A 615 366 A 615 367 A 615 370 A 615 371 A 615 372 A 615 372 0 615 372 1 615 733 A 615 733 0 615 733 1 615 733 3 615 733 4 615 733 5 615 733 6 615 733 7 615 733 8 615 733 9 615 734 A 615 734 0 615 734 1 615 734 2 615 734 3 615 734 4 615 734 5 615 734 6 615 734 7 615 734 8 615 736 A 615 737 A 615 738 2 615 738 3 615 738 4 615 738 5 615 860 A 615 862 A

Name of Block Applicant: Rena Buttica
z

Signature: Rena Buttica
z

Title: Sr. Specialist
9630

Telephone No.: 770-945-9630-

FAX No.: 770-945-

E-Mail: rw0052@att.com

A. Available Numbers: 346839

B. Assigned Numbers: 576477

C. Total Numbering Resources: 1021471

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³: 0

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

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 -
Previous 6 months⁴ -7530 -22535 174 1270 -3630 -29

F. Forecast

- Next 12 months⁵ -5380 -5380 -5380 -5380 -5380 -5380 -5380 -5380 -5380 -5380 -5380 -5380

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): -5380.0

H. Months
to Exhaust⁶
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	346839	-64.468
2	347839	-64.654

I.

Utilization⁷ Assigned Numbers(B) X 100 = 56.436
=

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

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

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2016.

MTE CERTIFICATION PRE-ENTRY WORKSHEET

(one form for each block requested)

Contact Information

Date
OCN
Co. Name
Rate Center

**List Full NPA(s) - NXX(s) and Block NPA(s) - NXX-X(s)
included in growth calculation**

List all @
RC level

Title _____
Phone _____
Fax _____

A

Available Numbers	346,839	
Assigned Numbers	576,477	
Total Numbering Resources	1,021,471	(* =Total Installed - Intermediate)
Qty of numbers activated in past 90 days	0	

B. Previous 6-month growth history

Month 1	-7530	(Oldest)
Month 2	-22535	
Month 3	174	
Month 4	1270	
Month 5	-3630	
Month 6	-29	(Most Current)

C. **Forecast - Next months 1-12**

Month 1	-5380	(Current)
Month 2	-5380	
Month 3	-5380	
Month 4	-5380	
Month 5	-5380	
Month 6	-5380	(Future)
Month 7	-5380	
Month 8	-5380	
Month 9	-5380	
Month 10	-5380	
Month 11	-5380	
Month 12	-5380	

Add quantity to be used by customer in appropriate forecasted month if we're making request for specific cust request we cannot fill from current inventory.

Appendix 3

MTE CERTIFICATION PRE-ENTRY WORKSHEET

(one form for each block requested)

D.

Avg Mo Forecast

(From part C above divided by 6)

-5380

E.

MTE = TN's available for Assgn / Avg Mo Forecast

-64.47

Utilization Percentage = Assigned / Total Resources

56.44%

Explanation

Blocks needed for customer request

Newly acquired numbers may be excluded from the utilization calculation. Please refer to the FCC 00-104 for reporting requirements.

Jeopardy Analysis - F											
Month: 03/2016 OCN: All											
RC: NASHVILLE		RC State: All		Site/WC: All		Site/WC State: All		CLLI: All		Sort by: Exhaust	
RC	RC_ST	CLLI EXH	RC EXH	TOT	UNAV	AVAIL	%AVAIL	MTE	MTE THR	%UTIL	UTIL THR
NASHVILLE	TN	85	85	1343673	996834	346839	25	999.9	6	42.9	65
<div> <div> <div>RC</div> <div>Nashville</div> </div> <div> <div>Available</div> <div>346839</div> </div> <div> <div>AVG Growth</div> <div>-5380</div> </div> <div> <div>MTE</div> <div>64.47</div> </div> <div> <div>% Utilization</div> <div>56.44%</div> </div> </div>											

[illegible]

100

Inward Activity Histo											
Start Month: 10/2015			End Month: 03/2016			OCN: All			Site/WC: All		
RC: NASHVILLE			RC State: All			CLLI: All			NPA: All		
RANGE			TOT			INST			TOT AVG INST AVG		
10/2015 to 03/2016			9290			8061936			1548 1343656		
			TOT			INST					
2015/10			1,933			1,343,627					
2015/11			1,022			1,343,624					
2015/12			1,896			1,343,646					
2016/01			2,328			1,343,683					
2016/02			1,174			1,343,683					
2016/03			937			1,343,673					
Surface Sum			9,290			8,061,936					

Pooling Administration System	
<div>•</div> <div>Sign Out</div>	
<input checked="" type="checkbox"/> rw0052@att.com (SP)	Time : 05/02/2016 11:43:25 AM EDT
	<p>Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)¹</p> <p>You have requested more blocks than you will exhaust in six months.</p> <p>Select One Option and Submit</p> <p><input checked="" type="radio"/> Return to the Months To Exhaust Form <input type="radio"/> Need to request a State Waiver <input type="radio"/> Received a State Waiver <input type="radio"/> Over-Contaminated Block Exception</p> <div><input type="button" value="Submit"/> <input type="button" value="Cancel"/></div>
<div><input type="checkbox"/></div> <div>© 2014 NeuStar, Inc. Legal Notice</div> <div>Last updated: May 2, 2016.</div>	

Pooling Administration System	
Sign Out	
<input checked="" type="checkbox"/> rw0052@att.com (SP)	Time : 05/02/2016 11:44:41 AM EDT
Printable Version	
TBPAG Attachment 1 - January 12, 2015	
Thousands-Block Application Form - Part 1A	
Tracking Number:	<u>629-</u> <u>NASHVILLE-TN-</u> <u>918107</u> <u>Individual Block</u> <u>Request</u>
Type of Application:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Change ⁱ <input type="checkbox"/> Disconnect
<u>GENERAL APPLICATION INFORMATION</u>	
1.1 Contact Information:	
<u>Block Applicant:</u>	
Company Name:	<u>BELLSOUTH TELECOMM INC DBA SOUTH</u> <u>CENTRAL BELL TEL</u>
Headquarters Address:	<u>500 Broad St SE</u>
City, State, Zip:	<u>Gainesville, GA, 30501</u>
Contact Name:	<u>Rena Buttica</u>
Contact Address:	<u>500 Broad St SE</u>
City, State, Zip:	<u>Gainesville, GA, 30501</u>
Phone: <u>770-</u> <u>945-9630</u>	Fax: <u>770-945-</u> <u>9630</u> E-mail: <u>rw0052@att.com</u>
<u>Pooling Administrator:</u> ⁱⁱ	
Contact Name:	<u>Genevieve Bettiga</u> <u>1800 Sutter St</u>

Contact
Address:
City, State, Concord, CA, 94520
Zip:
Phone: 925-363-7652 Fax: 925-363-7683
E-mail: genevieve.battiga@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN needed ⁱⁱⁱ _____

NPA: 629 LATA: 470 OCN: ^{iv} 9419 Parent
Company's OCN
9419

Number of Thousands-Blocks Requested : 2Switch Identification (Switching Entity/POI) : ^v
NSVLTNAARS5Rate Center: ^{vi} NASHVILLE

1.3 Dates:

Date of Application: ^{vii} _	Requested Block Effective Date: ^{viii}
<u>05/02/2016</u>	<u>06/02/2016</u>
	-

☐ 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 ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company ^x ☐ Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ or 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 _____ or No _____
- d) Has this block been protected from further assignment: Yes _____ or 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**Sr. Specialist****05/02/2016**

Signature of Block Applicant 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 iconectiv™ LERG™ 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 iconectiv Telecom 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™ tandem of the facilities based provider^{xi}. 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. The 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.

Footnotes:

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

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

^{iv} 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).

^v 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.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

*Select if you are not the current Block Holder

^{xi} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

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Last updated: May 2,
2016.

Pooling Administration System			
			Sign Out
<input checked="" type="checkbox"/> rw0052@att.com (SP)		Time : 05/02/2016 11:45:22 AM EDT	
		Printable Version	
<div>January 12, 2015 ATIS-0300066.at3 Pooling Administrator's Response/Confirmation TBPAG Part 3</div> <div>Attachment 3</div>			
Tracking Number :		<u>629-NASHVILLE-TN-918107</u>	
Date of Application:		<u>05/02/2016</u>	Effective Date: _____
Date of Receipt:		<u>05/02/2016</u>	Date of Response: <u>05/02/2016</u>
Service Provider Name:		<u>BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL</u>	
(iconectiv TM LERG TM Routing Guide) OCN:		<u>9419</u>	
Parent Company OCN:		<u>9419</u>	
NPAC SOA SPID :		_____	
Pooling Administrator Contact Information:			
Genevieve Bettiga		Phone:	<u>925-363-7652</u>
Signature of Pooling Administrator			
Genevieve Bettiga		Fax:	<u>925-363-7683</u>
Name (print)			
Email:		<u>genevieve.bettiga@neustar.biz</u>	

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): ¹ _____

Rate Center: _____

NSVLTNAARS5

NASHVILLE

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:

¹ 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

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2016.



Metropolitan Nashville Airport Authority™

One Terminal Drive, Suite 501 • Nashville, TN 37214-4114 • 615-275-1600

April 14, 2016

Mr. David Ford
Team Lead, AT&T GE
333 Commerce Street
24th Floor
Nashville, TN 37201

Dear David:

MNAA is requesting 2,000 consecutive numbers issued with the new area code, 629. The starting number of the range cannot start with an 8XXX, 9XXX, or 0XXX. Our preference is to have the prefix of 262; for example 629-262-XXXX. Our plan is to phase out the 615-275-XXXX numbers as we bring in new tenants and departments.

Sincerely,

A handwritten signature in black ink, appearing to read "Vanessa J. Hickman".

Vanessa J. Hickman
Vice President & Chief Administrative Officer

/vjh

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