

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to TEAMHealth*
Docket No. 16-00081

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 number plan area ("NPA") or more commonly known as an 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, **TEAMHealth**.

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, ¶161 (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 Knoxville 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

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.

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 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 May 20, 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 500 Direct Inward Dial ("DID") numbers in the Knoxville Rate Center. However, pursuant to Paragraph 3, Footnote 4 above, a one (1) 1,000 block of numbers in any Knoxville NPA-NXX will meet the demands of its customer.

8. The code assignment request was for 500 new numbers in the 865 NPA area code, in response to **TEAM**Health's request for services needed to grow their business. As AT&T

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.

Tennessee did not have the existing numbers to meet its customer's request, AT&T Tennessee is requesting that a one (1) 1,000 block of 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 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 Knoxville Rate Renter, including the Knoxville Central Office is attached hereto as Exhibit "C."

10. At the time of the code request, the Knoxville Rate Center had an MTE of approximately 59.03 months.¹¹

11. Thereafter, on or about June 23, 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.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

¹¹ See *Id.*

¹² See *Id.*

¹³ See Exhibit D to this Petition.

¹⁴ Correspondence from TEAMHealth is attached as Exhibit "E".

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."¹⁵

13. 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

14. 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.¹⁷

15. 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 *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).

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

16. Included with this Petition is a proposed 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 **TEAM**Health in the Knoxville Rate Center within the 865 area code; and
3. Grant the requested relief as soon as possible.

Respectfully submitted,

GULLETT, SANFORD, ROBINSON & MARTIN

BY: 

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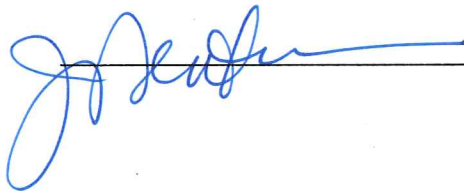
Attorneys for AT&T Tennessee

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 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
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Sterling, VA 20166
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

REQUEST OF AT&T TENNESSEE FOR EXPEDITED
REVIEW OF CENTRAL OFFICE CODE DENIAL
TEAMHEALTH

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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 the request for the Knoxville Rate Center served by Switch Identification No. KNVLTNWHDS0.

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking
Number: **865-KNOXVILLE-TN-930376****Full NXX: Pool
Replenishment**Type of
Application: ☒ New ☐
Change¹ ☐
Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:Company/Entity
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: **Gainesville** State: **GA** ZIP: **30501**Phone: **770-945-9630** Fax : **770-
945-
9630**E-mail: **rw0052@att.com**Code Administrator:²Name: **Michael Ortega**Address: **46000 Center Oak Plaza**City: **Sterling** State: **VA** ZIP: **20166**Phone: **571-434-5348** Fax : **571-
434-
5502**NXX:³ LATA: **474**
1.2 NPA: **865** OCN:⁴**9419** Parent
Company's OCN(s) **9400**

Switching Identification (Switching Entity/POI)

⁵**KNVLTNWHDS0**

Locality/City/Wire Center:

Rate Center:⁶**KNOXVILLE**Homing Tandem Operating Co.⁷:**ATT**Tandem Homing
CLLI^{TM8}:**KNVLTNWH93T**EXHIBIT A
NXX – TEAMHealth
Page 2 of 41.3 DatesDate of Application:**06/23/2016**

Requested Effective

Date:^{9,10}**08/28/2016**

☐ 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 Yes _____ No **X**

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other):
Incumbent Local Exchange Carrier (ILEC)b) Type of service (e.g., Cellular - Type 2): **Wireline**c) Code Assignment Preference (Optional) **865-xxx-4**

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem
Homing CLLI☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservations1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application¹⁴.

Rena Buttica

Signature of Code Applicant

Sr. Specialist

Title

06/23/2016

Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating 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 may contact NECA (800-228-8597) to be assigned a Company Code (s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language[®] Location Code (CLLITM Code) of the applicant's switch or POI. Common

Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This 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, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level [1] (Thousands-Block Number Pooling Growth Block Request)

Date: 27-May-16 OCN: _____ Company Name: _____
Rate Center: _____

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

Name of Block Applicant: CLAUDE L. PERRY Signature: _____
Title: _____ Telephone No.: 205.968.4231 FAX No. _____
E-Mail: _____

A. Available Numbers: 205974
B. Assigned Numbers: 254628
C. Total Numbering Resources: 469864
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0
List excluded Code(s) or Block(s): _____

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months[2]	196	403	948	470	55	20305						
F. Forecast – Next 12 months[3]	-3489	-3489	-3489	-3489	-3489	-3489	-3489	-3489	-3489	-3489	-3489	-3489

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

H. Months to Exhaust[4]

$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{\hspace{2cm}} -59.03$$

I. Utilization[5]

$$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = \underline{\hspace{2cm}} 54.19$$

Explanation:

- [1] 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.
 [2] 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.
 [3] Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
 [4] 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, § 52.15 (g) (3) (iii)).
 [5] Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(iii))

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)Tracking Number: 865-KNOXVILLE-TN-930376Date: Thursday, June
23, 2016OCN: 9419Company Name: BELLSOUTH TELECOMM INC
DBA SOUTH CENTRAL BELL TELRate Center: KNOXVILLE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:865 281 A 865 281 0 865 281 2 865
281 4 865 212 A 865 215 A 865 219 A 865 219 0 865 219 4 865 219 6 865 219 7 865 219 8 865
219 9 865 226 A 865 226 0 865 226 1 865 226 2 865 226 3 865 226 4 865 226 5 865 226 6 865 226
7 865 226 8 865 773 A 865 281 6 865 281 7 865 281 8 865 281 9 865 437 1 865 437 2 865 437 4
865 450 A 865 909 A 865 909 0 865 909 1 865 909 2 865 909 3 865 909 4 865 909 5 865 909 6 865
909 8 865 909 9 865 305 A 865 470 A 865 474 A 865 474 2 865 474 3 865 474 4 865 474 5 865
970 A 865 971 A 865 974 A 865 985 A 865 985 3 865 521 A 865 522 A 865 523 A 865 524 A 865
525 A 865 531 A 865 539 A 865 540 A 865 540 0 865 540 1 865 540 2 865 540 3 865 540 4 865
540 5 865 540 7 865 540 8 865 540 9 865 541 A 865 544 A 865 544 0 865 544 1 865 544 2 865 544
3 865 544 4 865 544 5 865 544 6 865 544 7 865 544 9 865 545 A 865 546 A 865 985 5 865 985 7
865 549 A 865 558 A 865 558 0 865 558 1 865 558 2 865 558 3 865 558 4 865 558 5 865 558 6 865
558 8 865 558 9 865 560 A 865 560 0 865 560 1 865 560 2 865 560 3 865 560 4 865 560 5 865 560
7 865 560 8 865 560 9 865 564 A 865 329 A 865 329 0 865 329 1 865 329 2 865 329 3 865 329 4
865 329 5 865 329 8 865 329 9 865 330 A 865 331 A 865 573 A 865 577 A 865 579 A 865 582 A
865 582 0 865 582 2 865 582 3 865 582 4 865 582 7 865 582 8 865 582 9 865 583 A 865 583 0 865
583 1 865 583 2 865 583 3 865 583 4 865 583 5 865 583 7 865 583 8 865 584 A 865 588 A 865 594
A 865 595 A 865 602 A 865 609 A 865 631 A 865 632 A 865 633 A 865 637 A 865 647 A 865 656
A 865 670 A 865 673 A 865 686 A 865 686 0 865 686 1 865 686 3 865 686 4 865 686 7 865 686 9
865 687 A 865 688 A 865 373 A 865 374 A 865 689 A 865 690 A 865 691 A 865 692 A 865 692 0
865 692 1 865 692 2 865 692 3 865 692 4 865 692 5 865 692 6 865 692 8 865 692 9 865 693 A 865
694 A 865 403 A 865 403 1 865 403 3 865 403 4 865 403 5 865 403 6 865 403 7 865 403 8 865 766
A 865 766 0 865 766 1 865 766 3 865 766 6 865 766 8 865 769 A

Name of Block Applicant: Rena ButticaazSignature: Rena ButticaazTitle: Sr. SpecialistPhone: 770-945-9630-Fax: 770-945-9630E-Mail: rw0052@att.com

A. Available Numbers: **205974**

B. Assigned Numbers: **254628**

C. Total Numbering Resources: **469864**

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

<u>196</u>	<u>-403</u>	<u>-948</u>	<u>470</u>	<u>55</u>	<u>-20305</u>
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F. Forecast
 - Next 12
 months⁵

<u>-3489</u>	<u>1000</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>	<u>-3489</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): **-2740.833**

H. Months
 to Exhaust⁶

$$= \frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	205974	-75.15

I.
 Utilization⁷

$$= \frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \textbf{54.192}$$

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. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4) (ii))

Pooling Administration System	
<div>•</div> <div>Sign Out</div>	
<div> rw0052@att.com (SP)</div> <div>Time : 06/23/2016 03:19:23 PM EDT</div>	
	<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 click 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</p> <div><div>Submit</div><div>Cancel</div></div>
<div></div>	<div>© 2014 NeuStar, Inc. Legal Notice</div> <div>Last updated: June 23, 2016.</div>

TRACKER: TEAM HEALTH																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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RC: KNOXVILLE		RC State: TN		Site/WC: All		Site/WC State: All		CLLI: All		Sort by: Rate Center			
RC	RC_ST	CLLI EXH	RC EXH	TOT	UNAV	AVAIL	%AVAIL	MTE	MTE THR	%UTIL	UTIL THR	ELIG	
KNOXVILLE	TN	85	85	611945	446026	165919	27	623.76	6	41.61	65		
E													
TN Utilization Report (NRUF U1)													
Month: 04/2016 OCN: All RC: KNOXVILLE RC State: TN													
Site/WC: All Site/WC State: All NPA: All NXX: All													
	ASGN	INTM	RSVD	AGNG	ADMIN	AVAL	INST						
865	254,628	142,081	4,059	25,340	19,918	205,974	611,945						
Surface Su	254,628	142,081	4,059	25,340	19,918	205,974	611,945						

Tracking Number: _____

TBPAG Att 1 - March 19, 2007
ATIS-0300066.at1

**Thousands-Block Application Form
Part 1A**

Type of Application (check one): New ☒ Change[i] _____ Disconnect _____

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: _____
Headquarters Address: _____ City _____ State _____ Zip _____
Contact Name: CLAUDE L. PERRY
Contact Address: _____ City _____ State _____ Zip _____
Phone: 205.968.4231 Fax _____
E-Mail: _____

Pooling Administrator[iii]:

Contact Name: _____
Contact Address: _____ City _____ State _____ Zip _____
Phone: _____ Fax _____
E-Mail: _____

1.2 General Information

Check one: No LRN needed ☒ LRN needed[iii] _____

NPA: 865 LATA: KNLV OCN[iv]: 9419 Parent Company's OCN 9400
Number of Thousands-Blocks Requested: _____

Switch Identification (Switching Entity/POI)[v]: KNLVTNWHDS0 City or Wire Center Name _____
Rate Center[vi]: KNOXVILLE Rate Center Sub Zone: _____

1.3 Dates

Date of Application[vii]: _____ Requested Block Effective Date[viii]: QUICKLY
Request Expedited Treatment? Yes ☒ No _____
(See Section 8.6)

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: 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) SEE ATCHMNT LTR
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

Change block: Yes _____ If Yes, indicate NPA-NXX-X, type of and reason for change:

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.

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. Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ 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 Telcordia™ 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[ix]. Explanations of these terms may be found in the footnotes.
- Section 1.2 The date the Service Provider completes the application should be entered in this section, as well as the
- Section 1.3 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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

- [i] Identify type of and reason for 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] Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

May 20, 2016

EXHIBIT C
NXX – TEAMHealth
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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="05/20/2016"/>	Requestor Name	<input type="text" value="Andrea Walker"/>	Requestor Contact TN:	<input type="text" value="704"/> - <input type="text" value="733"/> - <input type="text" value="1152"/> Ext: <input type="text" value="943"/>
State	<input type="text" value="TN"/>	Requestor Email	<input type="text" value="aw7429@atl.com"/>		
Service Order Nbr:	<input type="text" value="C9DG8F71"/>	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="01"/> - <input type="text" value="22"/> - <input type="text" value="2016"/>				<input type="text" value="865"/> - <input type="text" value="693"/> - <input type="text" value="1000"/>
(MM - DD - YYYY)				Customer Name	<input type="text" value="Team Health"/>
Dialing Plan:		CLLI	<input type="text" value="KNVLTNWHD\$"/>		
DID	<input type="checkbox"/>	Wire Center	<input type="text"/>		
PRI	<input type="checkbox"/>	NPANXX	<input type="text"/>		

Note: Minimum 1 field is required to submit form.

Miscellaneous, Specifications or Restrictions:

Customer is requesting 500 DID numbers in any Knoxville NFA-NXX with the last four digits in the ranges attached. Customer wants as many consecutive as possible. Customer has sent a letter requesting an exchange be opened if

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

List Telephone Numbers - Add

Section A: Number Range(consecutive numbers)

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.

Section B: Number Range (Non-Consecutive Numbers)

Quantity Requested: Quantity Requested:

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

Unable to meet your request at this time,
however, we can do an allocation which will take 120+ days. Need letter from customer on letterhead stating the

(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

Additional TNs:

(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:

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

TNAC Specialist: cp9910@att.com TN: 888 -509 -9399 Response Date: 01 -15 2016

Download attachment:

Attachment:

(Max size: 4KB)

(Please upload attachment in .txt format)

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 865-KNOXVILLE-
TN-930376

Date of Application: 06/23/2016 Effective Date: _____
Date of Receipt: 06/23/2016 Date of Response: 06/23/2016

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL
BELL TEL

(LERGTM Routing
Guide¹) OCN: 9419

Parent Company OCN: 9400

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 (1-1000): _____Switch Identification (Switching/POI)²:KNVLTNWHDS0

Rate Center:

KNOXVILLE

☒ Form complete, request denied.

Explanation:

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

Explanation:

Remarks:

¹ Telcordia[®] is a registered trademark and LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language[®] Location Code (CLLI[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

EXHIBIT E
NXX – TEAMHealth
Page 1 of 2

From: Albert Smith
Manager, Telecommunications
865-293-5420

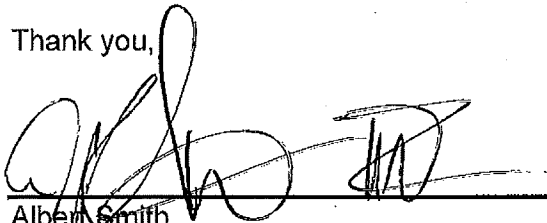
To: Bill Donnell and Catherine Arnold
AT&T Account Rep

Date: 1/11/2016

Re: New DID numbers

It is our understanding that you cannot provide 500 new numbers in Knoxville TN in sequential blocks within requested ranges that we can use with our telecommunications network. We provide services to hospitals nationally and need additional numbers to support our customers. Please open up an additional exchange or blocks within an exchange so that we can get the numbers we need to grow our business. We request that the new range fall within one of the suggested ranged on the attached list.

Thank you,



Albert Smith,
Manager, Telecom

1/11/2016

Date

_Team Health DID List.txt

13xx
16xx
17xx
18xx
19xx
21xx
22xx
27xx
32xx
34xx
4040 - 4099
44xx
4600 - 4650
62xx
6340 - 6399
65xx
66xx
7540 - 7599
7700 - 7749
78xx
7900 - 7959
80xx
86xx
87xx
88xx
89xx