

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

March 15, 2017

In Re: Petition for Expedited Review of Growth Code) TRA Docket No. 17-00024
Denial by the Number Pooling Administrator)
Relating to the Department of Veterans Affairs,)
Memphis, Tennessee)

**BELLSOUTH TELECOMMUNICATIONS, LLC, D/B/A AT&T TENNESSEE'S
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 numbering resource determinations, petitions the Tennessee Regulatory Authority ("TRA" or the "Authority") for review of a recent denial of AT&T Tennessee's application for use of central office code numbering resources in the 901 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 upon 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

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*").

requested numbering resources 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, the Department of Veterans Affairs, Memphis, Tennessee.

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

1. AT&T Tennessee is an incumbent local exchange carrier ("ILEC") that provides, among other things, intraLATA, local exchange telecommunications services in various portions of Tennessee, including the Memphis 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 telephone numbers.

5. Among other things, the FCC required that, in order to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's

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*").

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 (“COAG”) 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 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 percent (75%). Based on the FCC’s Orders, carriers must meet both the six (6) months MTE requirement and the 75% utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about March 3, 2017, 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 1,000 number consecutive block beginning with 1.....1XXX in the Memphis Rate Center. However, pursuant to Paragraph 3, Footnote 4

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.

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.

above, a one (1) 1,000 block of numbers in any Memphis NPA-NXX will meet the demands of its customer.

8. The code assignment request was for 1,000 new numbers in the 901 NPA or area code, in response to the Department of Veterans Affairs, Memphis Tennessee's request for telephone services needed in order to manage and grow their business needs. As AT&T 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 beginning with 1....1XXX 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 Memphis Rate Renter, including the Memphis Central Office is attached hereto as Exhibit "C."

10. At the time of the code request, the Memphis Rate Center had an MTE of approximately 49.908% months.¹¹

11. Thereafter, on or about March 3, 2017, AT&T Tennessee's request was denied because AT&T Tennessee had not yet 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

¹¹ See *Id.*

¹² See *Id.*

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 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 jurisdiction 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

¹³ See Exhibit "D" to this Petition.

¹⁴ Correspondence from the Department of Veterans Affairs, Memphis, Tennessee is attached as Exhibit "E".

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").

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

(Emphasis added).

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 in order to meet the specific requirements of the Department of Veterans Affairs, Memphis, Tennessee in the Memphis Rate Center within the 901 NPA or area code; and
3. Grant the requested relief as soon as possible.

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).

Respectfully submitted,

GULLETT, SANFORD, ROBINSON & MARTIN

BY: 

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Attorneys for AT&T Tennessee

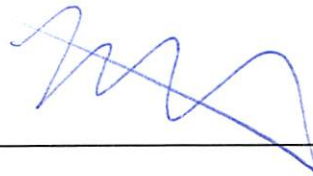
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CERTIFICATE OF SERVICE

I hereby certify that on March 15th, 2017 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
46000 Center Oak Place
Sterling, VA 20166
genevieve.bettiga@neustar.biz



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

IN RE:) TRA DOCKET NO.
) _____
REVIEW OF CENTRAL OFFICE CODE DENIAL FOR THE)
REQUEST OF AT&T TENNESSEE FOR EXPEDITED)
DEPARTMENT OF VETERANS AFFAIRS, MEMPHIS, TENNESSEE)

**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, the TRA determines that the request is reasonable and necessary and hereby 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 should be and, therefore, is hereby reversed as stated herein.
2. The Pooling Administrator is ordered to assign the requested numbering resources for the Memphis Rate Center served by Switch Identification No. MMPHTNSLDS0.

Pooling Administration System

[Sign Out](#)rw0052@att.com (SP)

Time : 03/03/2017 05:42:55 PM EST

[Printable Version](#)Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking
Number:**901-MEMPHIS-TN-993981****Full NXX: Pool
Replenishment**☒ New

Type of

☐

Application:

Change¹☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:Company/Entity **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL**
Name: **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: **866-623-2282** Fax :

~~571-~~
~~434-~~
~~5502~~

NXX:³ LATA: **468**

1.2 NPA: **901** OCN:⁴**9419**
Parent Company's OCN(s) **9400**

Switching Identification (Switching
Entity/POI) ⁵**MMPHTNSLDS0**

Locality/City/Wire Center:

Rate Center:⁶**MEMPHIS**

Homing Tandem Operating

Tandem Homing

Co.⁷:**AT&T**

CLLI^{TM8}:**MMPHTNMA84T**

1.3 Dates

Requested Effective

Date of Application:**03/03/2017** Date:^{9,10}

05/08/2017

☐ 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) **901-xxx-1**

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 Reservations

1.5 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

03/03/2017

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 CLLITM, LERGTM Routing Guide and iconectivTM 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 CLLITM 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.

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Last updated: March 3,
2017.

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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: 901-MEMPHIS-TN-993981Date: Friday,
March 3, 2017OCN: 9419Company Name: BELLSOUTH TELECOMM INC DBA
SOUTH CENTRAL BELL TELRate Center: MEMPHIS

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:
901 272 A 901 274 A 901 276 A
901 278 A 901 452 A 901 453 A 901 453 1 901 454 A 901 454 0 901 454 1 901 454 2 901 454 4
901 454 5 901 454 6 901 454 7 901 454 8 901 454 9 901 458 A 901 287 2 901 287 3 901 287 4 901
287 5 901 287 6 901 287 7 901 287 8 901 463 1 901 463 2 901 678 A 901 495 A 901 495 1 901
495 6 901 495 7 901 495 8 901 680 A 901 681 A 901 682 A 901 683 A 901 684 A 901 685 A 901
309 A 901 721 A 901 721 0 901 721 1 901 721 2 901 721 4 901 721 6 901 721 7 901 721 8 901
721 9 901 722 A 901 725 A 901 726 A 901 726 0 901 726 1 901 726 2 901 726 4 901 726 5 901
726 6 901 726 7 901 726 8 901 726 9 901 515 A 901 515 2 901 515 3 901 515 4 901 728 A 901
729 A 901 729 0 901 729 1 901 729 2 901 729 3 901 729 4 901 729 5 901 729 8 901 737 A 901
743 A 901 744 A 901 745 A 901 746 A 901 746 2 901 746 6 901 320 A 901 321 A 901 321 1 901
321 2 901 321 3 901 321 4 901 321 6 901 321 7 901 321 8 901 321 9 901 323 A 901 324 A 901
325 A 901 327 A 901 332 A 901 515 5 901 516 A 901 521 A 901 522 A 901 522 0 901 522 1 901
522 2 901 522 3 901 522 4 901 522 6 901 522 7 901 522 8 901 522 9 901 523 A 901 524 A 901
525 A 901 526 A 901 527 A 901 528 A 901 529 A 901 529 0 901 529 1 901 529 2 901 529 3 901
529 4 901 529 5 901 529 6 901 747 A 901 747 0 901 747 1 901 747 2 901 747 3 901 747 4 901 747
5 901 747 6 901 747 7 901 747 9 901 748 A 901 748 0 901 748 1 901 748 2 901 748 3 901 748 4
901 748 6 901 748 7 901 748 8 901 748 9 901 751 A 901 752 A 901 753 A 901 754 A 901 755 A
901 756 A 901 757 A 901 758 A 901 759 A 901 761 A 901 762 A 901 763 A 901 765 A 901 766 A
901 767 A 901 341 A 901 341 0 901 341 1 901 341 2 901 341 6 901 341 7 901 341 8 901 344 A
901 345 A 901 346 A 901 529 8 901 529 9 901 531 A 901 531 1 901 531 2 901 531 3 901 531 4
901 531 5 901 535 A 901 537 A 901 541 A 901 542 A 901 543 A 901 544 A 901 545 A 901 545 0
901 545 1 901 545 2 901 545 3 901 545 4 901 545 5 901 545 6 901 545 7 901 545 8 901 546 A 901
547 A 901 774 A 901 775 A 901 785 A 901 786 A 901 786 0 901 786 1 901 786 5 901 786 7 901
786 9 901 789 A 901 794 A 901 795 A 901 797 A 901 800 A 901 348 A 901 353 A 901 354 A 901
354 0 901 354 1 901 354 2 901 354 3 901 354 5 901 354 6 901 354 7 901 354 8 901 354 9 901 357

A 901 358 A 901 360 A 901 565 A 901 566 A 901 566 0 901 566 1 901 566 2 901 566 3 901 566 4
901 566 5 901 566 6 901 566 7 901 566 8 901 566 9 901 800 3 901 818 A 901 820 A 901 820 0
901 820 1 901 820 2 901 820 3 901 820 4 901 213 A 901 213 0 901 213 1 901 213 2 901 213 3 901
213 4 901 213 5 901 213 9 901 362 A 901 363 A 901 365 A 901 366 A 901 367 A 901 368 A 901
369 A 901 370 A 901 371 A 901 371 0 901 371 2 901 371 3 901 371 4 901 371 5 901 371 8 901
371 9 901 372 A 901 373 A 901 374 A 901 375 A 901 377 A 901 572 A 901 572 2 901 572 4 901
572 6 901 572 7 901 572 8 901 572 9 901 575 A 901 575 0 901 820 5 901 820 7 901 820 8 901 820
9 901 821 A 901 379 A 901 379 0 901 379 1 901 379 2 901 379 3 901 379 4 901 379 7 901 379 9
901 380 A 901 381 A 901 382 A 901 383 A 901 383 1 901 383 2 901 383 4 901 383 5 901 383 6
901 383 7 901 383 8 901 383 9 901 384 A 901 385 A 901 386 A 901 387 A 901 387 0 901 387 1
901 387 2 901 387 3 901 387 4 901 387 5 901 387 6 901 388 A 901 575 1 901 575 2 901 575 3 901
575 4 901 575 5 901 575 6 901 575 7 901 575 8 901 575 9 901 576 A 901 577 A 901 578 A 901
579 A 901 579 1 901 579 2 901 579 3 901 579 4 901 579 5 901 579 6 901 579 7 901 579 8 901 580
A 901 222 A 901 224 A 901 226 A 901 227 A 901 395 A 901 395 0 901 395 1 901 395 2 901 395 5
901 395 8 901 396 A 901 397 A 901 398 A 901 399 A 901 399 1 901 399 2 901 399 3 901 399 5
901 399 6 901 595 A 901 597 A 901 238 2 901 238 3 901 415 A 901 415 2 901 415 3 901 415 6
901 415 7 901 419 A 901 421 A 901 421 2 901 421 3 901 421 4 901 421 7 901 922 A 901 922 0
901 922 1 901 922 2 901 922 3 901 922 4 901 922 7 901 922 8 901 937 A 901 937 0 901 937 1 901
937 2 901 937 3 901 937 4 901 937 5 901 937 6 901 937 7 901 937 8 901 942 A 901 942 0 901 942
1 901 942 2 901 942 3 901 942 4 901 942 5 901 942 6 901 942 7 901 433 A 901 433 0 901 433 1
901 433 2 901 433 3 901 433 4 901 433 5 901 433 6 901 433 7 901 433 8 901 434 A 901 942 9 901
946 A 901 947 A 901 948 A 901 266 A 901 448 A 901 624 A

Name of Block Applicant: Rena Buttica

Signature: Rena Buttica

Title: Sr. Specialist

Phone: 770-945-9630-

Fax: 770-945-9630

E-Mail: rw0052@att.com

A. Available Numbers: 488651

B. Assigned Numbers: 549516

C. Total Numbering Resources: 1101048

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 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 ⁴	<u>538</u>	<u>1559</u>	<u>429</u>	<u>219</u>	<u>264</u>	<u>50</u>						
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F. Forecast

- Next 12 months ⁵	<u>510</u>	<u>13</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>	<u>510</u>
----------------------------------	------------	-----------	------------	------------	------------	------------	------------	------------	------------	------------	------------	------------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 427.167

H. Months
to Exhaust⁶
=

Numbers Available for Assignment to
Customers (A)

Average Monthly Forecast (G)

Block Requested

1

Available Numbers

488651

Months To Exhaust

1143.934

I.

Utilization⁷
=

Assigned Numbers (B)

X 100 =

49.908

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

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 Report 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))

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Last updated: March 3,
2017.

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 rw0052@att.com (SP)	Time : 03/03/2017 05:43:36 PM EST
<u>Printable Version</u>	
<div style="text-align: center;"><p>Tracking Number: <u>901-MEMPHIS-TN-993981</u></p><p>Thousands-Block Application Form - Part 1A Revised: January 4, 2016</p><p><u>Full NXX: Pool Replenishment</u></p><p>Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Change ⁱ <input type="checkbox"/> Disconnect</p><p style="text-align: center;">General Application Information</p><p>1.1 Contact Information:</p><p>Block Applicant:</p><p>Company Name: <u>BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL</u></p><p>Headquarters Address: <u>500 Broad St SE</u></p><p>City: <u>Gainesville</u> State: <u>GA</u> ZIP: <u>30501</u></p><p>Contact Name: <u>Rena Buttica</u></p><p>Contact Address: <u>500 Broad St SE</u></p><p>City: <u>Gainesville</u> State: <u>GA</u> ZIP: <u>30501</u></p><p>Phone: <u>770-945-9630</u> Fax: <u>770-945-9630</u></p><p>E-mail: <u>rw0052@att.com</u></p><p>Pooling Administrator:ⁱⁱ</p><p>Contact Name: <u>Genevieve Bettiga</u></p><p>Contact Address: <u>1800 Sutter St</u></p></div>	

City: Concord State: CA ZIP: 94520
Phone: 925-363-7652 Fax: 925-363-7683
E-mail: genevieve.bettiga@neustar.biz

1.2 General Information:

Check one : No LRN needed X LRN neededⁱⁱⁱ:

NPA: 901 LATA: 468 OCN^{iv}: 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI^v):
MMPHTNSLDS0

Rate Center^{vi}: MEMPHIS

1.3 Dates:

Date of Application^{vii}: 03/03/2017 Requested Effective Date^{viii}: 05/08/2017

Requested Expedited Treatment? (See Section 8.6) Yes No X

☐ 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.

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)
901-xxx-1

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) N/A

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 _____ 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rena Buttica

Sr. Specialist

03/03/2017

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 Telcordia Technologies, Inc. dba iconectiv (iconectivTM) LERGTM Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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.

^x Select if you are not the current Block Holder

^{xi} 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.

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