

BEFORE THE TENNESSEE PUBLIC UTILITIES COMMISSION

NASHVILLE, TENNESSEE

January 5, 2018

RE:

*Petition for Expedited Review of Growth Code
Denial by the Number Pooling Administrator –
Jasper Rate Center*

Docket No. 18-00006

**PETITION OF TELEPORT COMMUNICATIONS OF AMERICA, LLC - TN
FOR REVIEW OF CENTRAL OFFICE CODE DENIAL**

Teleport Communications of America, LCC – TN (“TCAL”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging the decision of the Number Pooling Administrator, NeuStar, Inc. (“NeuStar”), hereby petitions the Tennessee Public Utilities Commission (“TPUC”) to a review NeuStar’s denial of TCAL’s application for an NPA-NXX-X in the Jasper rate center in order for TCAL to serve its customer.

1. TCAL is a competitive local exchange carrier certificated by the TPUC providing telecommunications services in Tennessee.
2. NeuStar is an independent, non-governmental entity responsible for administering and managing numbering resources. See C.F.R. Section 52.13(a) and (b).
3. This petition is based upon FCC Rules found at 47 C.F.R. § 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (“TBPAAG”) and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee (“INC”). On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making related to numbering resource optimization (“FCC Order No. 00-104”

or the “March Order”). On December 29, 2000, the FCC issued a Second Report and Order, on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (“FCC 00-249” or the “December Order”). The Orders addressed issues and strategies relating to the efficient use of numbering.

4. In FCC Order No. 00-104 and FCC Order No. 00-429, the FCC announced rules and sought comments to implement uniform standards for numbering resources, to increase efficiency in the use of existing telephone numbers and to slow further exhaustion of the North American Numbering Plan (“NANP”).

5. FCC Order No. 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring carriers to report rate center based utilization to NeuStar. The FCC further required that to qualify for new numbering resources, applicants must prove that their existing inventory in the said rate center will exhaust within six months of the application.

6. In addition to the months-to-exhaust (“MTE”) threshold, the FCC also requires carriers to show rate center utilization of 75% to receive the additional numbering resources in said rate center. See FCC Order No. 00-249 at Paragraph 22; FCC Order No. 01-362 Paragraphs 50-52. Based upon the FCC’s Orders, carriers must meet both the six-month MTE requirement and the utilization threshold on a rate center basis to obtain additional number resources. *Id.* at Paragraph 29.

7. A TCAL customer, Hospital Corporation of America – Parkridge West Hospital has requested 2000 numbers in the Jasper rate center. A copy of the letter outlining the request is

attached as Exhibit "A". TCAL has developed a plan that the customer will implement so that the 2000 numbers will be assigned and activated within 180 days.

8. The Jasper rate center of the 423 Area Code converted to Number Pooling on September 16, 2002. Consequently, numbering resource acquisition by a Number Pooling carrier is through an interface with NeuStar².

9. On December 19, 2017 TCAL submitted a "Thousand Block Application Form Part 1A", and a "Months-to-Exhaust and Utilization Certification Worksheet – TN Level" to NeuStar for a thousand-block in the Jasper rate center to satisfy the customer request. A copy of this application is attached as Exhibit "B."

10. During the session via the Pooling Administration System ("PAS"), TCAL received an error message instructing to "Return to the Months to Exhaust Form", the request would not process through the system without a state waiver. The error message is included in Exhibit "B". NeuStar applies the FCC rules and INC Guidelines. Per Paragraphs 5 and 6, the rules require that a block holder requesting growth resources demonstrate that existing resources within the rate center will both exhaust within six (6) months and meet the seventy-five percent (75%) utilization level. The error message indicated that the utilization threshold was NOT met.

11. Although TCAL has adequate telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, TCAL's existing resources cannot satisfy this customer's need for 2000 numbers. TCAL owns 423-939-5 with approximately 800 numbers available.

² The federal rules in 47 C.F.R 52.15 generalize responsibilities of NANPA and the Pooling Administrator under the heading "Central office code administration".

12. As a result of the denial for additional numbering resources, TCAL is unable to provide the telecommunications services requested by its customer.

13. In setting its policy for the assignment of telephone numbers, the FCC designated NANPA and NeuStar, as the Pooling Administrator, to handle numbering resource administration.³ If a numbering resource administrator withholds numbering resources from a carrier, the FCC has specifically authorized state Commissions to overturn those decisions for reasonable cause. That authority is specifically set out in the relevant FCC Rule, 47 C.F.R. §52.15 (g) (3) (iv), which states:

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an OCN. The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory Commission. **The state Commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.**

Id. (Emphasis supplied).

The FCC also clarified in the FCC Order No. 00-249 Order that carriers may appeal to states using a "safety valve" mechanism (paragraphs 57-66). The FCC contemplated the need for, and gave structure to states to respond when denials failed to consider a "specific customer

³ 47 C.F.R. § 52.15(a) states: "Central Office Code Administration shall be performed by the NANPA, or another entity or entities, as designated by the Commission." 47 C.F.R. § 52.20(d) states: "The Pooling Administrator shall be a non-governmental entity that is impartial and not aligned with any particular telecommunications industry segment, and shall comply with the same neutrality requirements that the NANPA is subject to under this part."

request”.

14. An essential aspect of the “safety valve” provision is the accelerated response that is provided for in the FCC’s Order: States should act upon such a request in most instances in 10 business days, as noted by the FCC.

Finally, we recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier’s ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish a specific time limit for states to act on these requests, we believe that, in most instances, 10 business days from receipt of a request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests. If a state does not reach a decision on a safety valve request within a reasonable timeframe, carriers may submit such requests to the Commission for resolution. In addition, carriers may appeal to the Commission safety valve decisions made by states, and we delegate authority to the Common Carrier Bureau to review such petitions as expeditiously as possible.

Id. at Paragraph 66.

15. TCAL seeks the TPUC’s review of NeuStar’s decision to withhold resources from it on the grounds that it: (1) violates the orders and rules of the FCC which grant carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need and (2) interferes with TCAL’s ability to serve its customer. As the FCC has stated, “Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.” FCC Order No. 00-429 at Paragraph 61. By refusing to grant numbering resources to meet this customer’s needs, the decision prevents the customer from obtaining the service of its choice from its carrier of choice, TCAL.

Relief Sought

For these reasons, TCAL respectfully requests the TRA to expeditiously review NeuStar's decision denying TCAL's request for additional numbering resources and order NeuStar to provide the requested numbers to meet the specific requirements of TCAL's customer.

Respectfully submitted,

GULLETT, SANFORD, ROBINSON & MARTIN

By: 

Joshua R. Denton, #23248
150 Third Avenue South
Suite 1700
Nashville, TN 37201
(615) 244-4994
jdenton@gsrm.com

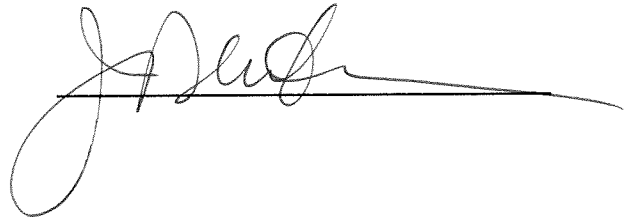
1151987

CERTIFICATE OF SERVICE

I hereby certify that on Jan. 5, 2018 a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ U.S. Mail
- ☐ Facsimile
- ☐ Overnight Mail
- ☒ Electronic Mail

Ms. Beth Sprague
NeuStar/NANPA
46000 Center Oak Place
Sterling, VA 20166
beth.sprague@neustar.biz

A handwritten signature in black ink, appearing to read "Beth Sprague", is written over a horizontal line.

**BEFORE THE TENNESSEE PUBLIC UTILITIES COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

REQUEST OF TELEPORT COMMUNICATIONS
OF AMERICA, LLC - TN ("TCAL") FOR EXPEDITED
REVIEW OF CENTRAL OFFICE CODE DENIAL
HOSPITAL CORPORATION of AMERICA – PARKRIDGE
WEST HOSPITAL

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)
)
)
)
)
)

DOCKET NO.

**ORDER APPROVING REQUEST OF TELEPORT COMMUNICATIONS
OF AMERICA, LLC ("TCAL") FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL AND
REVERSING CENTRAL OFFICE CODE DENIAL**

This matter came before the Tennessee Public Utilities Commission ("TPUC" or the "Authority for consideration of the *Petition for Expedited Review of Central Office Code Denial* filed by Teleport Communications of America, LLC - TN ("TCAL"). After consideration of the facts contained in the record and the applicable law, TPUC approves the request of TCAL and reverses the Pooling Administrator's denial of TCAL's request for additional numbering resources.

IT IS THEREFORE ORDERED THAT:

1. The Pooling Administrator's decision to deny TCAL's request for additional numbering resources is reversed as stated herein.
2. The Pooling Administrator is ordered to assign request for the Jasper rate center served by switch identification CHTGTNNSXEY.

EXHIBIT A



1 Dell Parkway
Nashville, TN
37217

Hospital Corporation of America®

December 15, 2017

HCA - Information Technology & Services, Inc. dba
Parkridge West Hospital
1000 Highway 28
Jasper, TN 37347

AT&T TNAC,

This Letter of Intent represents a request by Parkridge West Hospital for a contiguous block of 2000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP service. Parkridge West Hospital intends to order service, in the JASPER TN rate center, on the ATLNGATLGT9(P) switch pending AT&T's successful completion of the required testing. Parkridge West Hospital intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

HCA - Information Technology & Services, Inc. dba Parkridge West Hospital currently has no existing network configuration and therefore technical restrictions do not exist.

At its founding in 1968, Nashville-based HCA was one of the nation's first hospital companies. Today, we are the nation's leading provider of healthcare services, a company comprised of locally managed facilities that includes about 177 hospitals and 119 freestanding surgery centers in 20 states and in the United Kingdom. HCA is currently employing approximately 240,000 employees, with 37,000 physicians and 80,000 nurses. Approximately four to five percent of all inpatient care delivered in the country today is provided by HCA facilities.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Bailey".

Senior Telecom Analyst
1 Dell Parkway
Nashville, TN 37217
615-344-8849
cynthia.bailey@hcahealthcare.com

EXHIBIT B

Tracking Number: 423-JASPER-TN-1061836Thousands-Block Application Form - Part 1A
Revised: January 4, 2016Individual Block
RequestType of
Application: ☒ New ☐ Change ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company
Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TNHeadquarters
Address: One AT&T WayCity: Bedminster State: NJ ZIP: 07921Contact
Name: Lisa LoperContact
Address: One AT&T WayCity: Bedminster State: NJ ZIP: 07921Phone: 908-234-7622 Fax: 908-234-8044E-mail: lloper@att.comPooling Administrator:ⁱⁱContact
Name: Margaret Harrell-SimingtonContact
Address: 1800 Sutter Street, Suite 780City: Concord State: CA ZIP: 94520Phone: 925-363-8747 Fax: 925-363-8747E-mail: margaret.harrell-simington@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 423 LATA: 472 OCN^{iv}: 114F Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 2

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

Rate Center^{vi}: JASPER

1.3 Dates:

Date of Application^{vii}:
12/19/2017

Requested Effective Date^{viii}:
01/19/2018

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 : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____
423-651-4,5,6,7,8 2 CONSECUTIVE BLOCKS
- 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 _____ 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.

Lisa Loper

Manager-Code Administration

12/19/2017

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 (iconectiv™) LERG™ 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 iconectiv™ 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 CLLITM 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 CLLITM, LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Thousands-Block Number Pooling Administration Guidelines (TBPA) - 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: 423-JASPER-TN-1061836

Date: Tuesday, December 19, 2017 OCN: 114F Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

Rate Center: JASPER

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 423 939 5 JASPER 114F 1000

Name of Block Applicant: Lisa Loper Signature: Lisa Loper

Title: Manager-Code Administration
908-234-8044

Phone: 908-234-7622-

Fax:

E-Mail: lloper@att.com

A. Available Numbers: 852

B. Assigned Numbers: 148

C. Total Numbering Resources: 1000

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
months⁴

	<u>0</u>	<u>0</u>	<u>2</u>	<u>0</u>	<u>0</u>	<u>0</u>						
--	----------	----------	----------	----------	----------	----------	--	--	--	--	--	--

F. Forecast
- Next 12
months⁵

	<u>2001</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
--	-------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 334.333

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	852	2.548
2	1852	5.539

I.

Utilization⁷
= Assigned Numbers (B) X 100 = 14.8

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))

LOPER, LISA A

From: margaret.harrell-simington@neustar.biz
Sent: Tuesday, December 19, 2017 4:13 PM
To: LOPER, LISA A
Cc: PA_Part3@neustar.biz
Subject: , 423-JASPER-TN-1061836 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 19 December 2017

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 423-JASPER-TN-1061836

Date of Application: 12/19/2017

Effective Date: _____

Date of Receipt: 12/19/2017

Date of Response: 12/19/2017

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

(LERGTM Routing
Guide¹) OCN: 114F

Parent Company OCN: 7125

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Margaret Harrell-Simington

Phone:

925-363-8747

Signature of Pooling Administrator

Margaret Harrell-Simington

Fax:

925-363-8747

Name (print)

Email:

margaret.harrell-simington@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:

CHTGTNNSXEY

Rate Center:

JASPER

☒ 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:

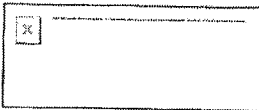
☐ Assignment Activity Suspended by Administrator.

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.



>>> Please See The Instructions Before Completing This Form <<<

☐ Check this box if the data on this form replaces the data on a previously submitted form.

Check the Data Before Submitting

Parent Company Name	AT&T Local Services
Service Provider Name	TELEPORT COMMUNICATIONS AMERICA, LLC-TN
Company Address	2600 CAMINO RAMON
Address 2	ROOM 2S750G
City	SAN RAMON
State	CA
Zip	94583
Contact Name	Linda F Richardson
Contact Tel #	925-901-8302
Fax #:	925-355-9268
E-mail	LR3262@att.com

Parent Company OC	7125
Service Provider OC	114F
Service Provider FR	0005937974
SP Service Type	CAP or CLEC

All Changes to Parent Company Name, Service Provider Name, Address, Contact Information, OCN(s), FRN and Service Type must be made on the Company Info page.

Bad SP Service Type

Numbering Resource Utilization For Each 1K Block											
		Rate Center Abbreviation	Assigned	Inter-mediate	Reserved	Aging	Admin	Notes/Assignee	Available	Utilization	Errors/Messages
NPA-NXX	X										
423-939	5	JASPER	146	0	0	0	0		854	14.60%	