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MAR 29 2018

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

TN PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

DOCKET OFFICE

March 28, 2018

RE:

Docket No.

18-00033

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

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**PETITION OF BELL SOUTH TELECOMM INC - TN  
FOR REVIEW OF CENTRAL OFFICE CODE DENIAL**

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BellSouth TeleComm Inc dba South Central Bell Tell – TN ("BellSouth TN"), 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 Utility Commission ("TPUC") to a review NeuStar's denial of BellSouth TN's application for an NPA-NXX-X in the Nashville rate center in order for BellSouth TN to serve its customer.

1. BellSouth TN is an incumbent 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 ("TBPAG") 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 BellSouth TN customer, Vanderbilt University, has requested 3000 numbers in the Nashville rate center. A copy of the letter outlining the request is attached as Exhibit “A”.

BellSouth TN has developed a plan that the customer will implement so that the 3000 numbers will be assigned and activated within 180 days.

8. The Nashville rate center of the 615 Area Code converted to Number Pooling on March 14, 2002. Consequently, numbering resource acquisition by a Number Pooling carrier is through an interface with NeuStar<sup>2</sup>.

9. On March 26, 2018 BellSouth TN 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 Nashville 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"), BellSouth TN 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 nor the months to exhaust were met.

11. Although BellSouth TN has adequate telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, BellSouth TN's existing resources cannot satisfy this customer's need for 3000 numbers.

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<sup>2</sup> 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, BellSouth TN 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.<sup>3</sup> 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

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<sup>3</sup> 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. BellSouth TN 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 BellSouth TN’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, BELLSOUTH TN.

**Relief Sought**

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

Respectfully submitted,

GULLETT, SANFORD, ROBINSON & MARTIN

By: \_\_\_\_\_

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

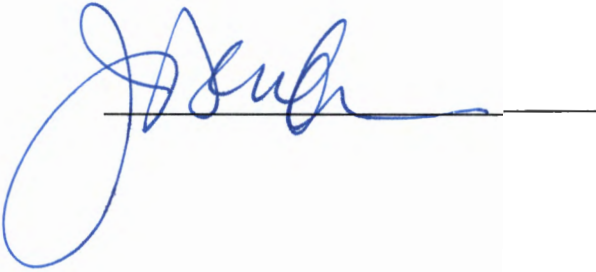
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 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](mailto:beth.sprague@neustar.biz)



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

IN RE:

REQUEST OF BELLSOUTH TELECOMM INC  
- TN ("BELLSOUTH TN") FOR EXPEDITED  
REVIEW OF CENTRAL OFFICE CODE DENIAL  
HOSPITAL CORPORATION of AMERICA – HORIZON MEDICAL  
CENTER

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DOCKET NO.

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**ORDER APPROVING REQUEST OF BELLSOUTH TELECOMM INC ("BELLSOUTH TN") FOR  
EXPEDITED REVIEW OF GROWTH CODE DENIAL AND REVERSING CENTRAL OFFICE CODE  
DENIAL**

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

**IT IS THEREFORE ORDERED THAT:**

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





Rick Carlton  
Vanderbilt University Information Technology  
PMB 34  
230 Appleton Pl  
Nashville, TN 37203

12/11/2017

Doris Lynn  
Service Consultant  
AT&T Global Ordering  
AT&T Services, Inc.

Doris:

Vanderbilt University is requesting 1,000 DID numbers for our trunk group 615-322-7311 and 3,000 DID numbers for our trunk group 615-936-0000. We are migrating our incoming services to IPFlex (SIP trunking) and are requesting these numbers to facilitate support for devices and services that do not work properly in the SIP environment.

Sincerely,

Rick Carlton



Tracking Number: **615-NASHVILLE-TN-1081438**Thousands-Block Application Form - Part I A  
Revised: January 4, 2016**Individual Block  
Request**Type of Application:      New                      Change <sup>i</sup>                      Disconnect

## General Application Information

## 1.1 Contact Information:

## Block Applicant:

Company Name: **BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**Headquarters Address: **2600 CAMINO RAMON**City: **SAN RAMON**      State: **CA**      ZIP: **94583**Contact Name: **PATTY BERRIS**Contact Address: **5001 Executive Pkwy**City: **SAN RAMON**      State: **CA**      ZIP: **94583**Phone: **925-901-1934**      Fax: **925-355-9268**E-mail: **pb1986@att.com**Pooling Administrator:<sup>ii</sup>Contact Name: **Margaret Harrell-Simington**Contact Address: **1800 Sutter Street, Suite 780**City: **Concord**      State: **CA**      ZIP: **94520**Phone: **925-363-8747**      Fax: **925-363-8747**E-mail: **margaret.harrell-simington@neustar.biz**

## 1.2 General Information:

Check one : No LRN needed \_\_\_\_\_ LRN needed<sup>iii</sup>: \_\_\_\_\_

NPA: 615 LATA: 470 OCN<sup>iv</sup>: 9419 Parent Company's OCN 9419

Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI<sup>v</sup>):  
NSVLTNSTDS0

Rate Center<sup>vi</sup>: NASHVILLE

1.3 Dates:

Date of Application<sup>vii</sup>:  
03/26/2018

Requested Effective Date<sup>viii</sup>:  
04/26/2018

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

Expedited Explanation:

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)         
615-862-1,2,3

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<sup>ix</sup>      Switching Id      Part 1B

OCN: Inter-company<sup>x</sup>      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](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**PATTY BERRIS**

**DATA ADMINISTRATOR**

**03/26/2018**

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<sup>TM</sup>) LERG<sup>TM</sup> Routing Guide<sup>xi</sup>. 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:

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup>A CO Code application will also need to be submitted to the PA.

<sup>iv</sup>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).

<sup>v</sup>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.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

<sup>vii</sup>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.

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 615-NASHVILLE-TN-1081438Date: Monday,  
March 26, 2018OCN: 9419Company Name: BELLSOUTH TELECOMM INC DBA  
SOUTH CENTRAL BELL TELRate Center: NASHVILLE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: NPA NXX B 615 214 A 615 221 A  
615 222 A 615 226 A 615 227 A 615 228 A 615 231 A 615 231 1 615 231 2 615 231 3 615 231 4  
615 231 5 615 231 6 615 231 7 615 231 8 615 231 9 615 232 A 615 232 0 615 232 1 615 232 2 615  
232 3 615 232 5 615 232 6 615 232 7 615 232 8 615 232 9 615 242 A 615 244 A 615 248 A 615  
251 A 615 252 A 615 253 A 615 254 A 615 255 A 615 256 A 615 258 A 615 258 0 615 258 1 615  
258 2 615 258 3 615 258 4 615 259 A 615 262 A 615 269 A 615 271 A 615 275 A 615 275 0 615  
275 1 615 275 2 615 275 3 615 275 4 615 279 A 615 284 A 615 291 A 615 292 A 615 297 A 615  
298 A 615 299 A 615 299 0 615 299 1 615 299 2 615 299 3 615 299 4 615 299 5 615 299 8 615 299  
9 615 309 A 615 313 A 615 315 A 615 315 0 615 315 2 615 315 3 615 315 4 615 315 5 615 315 6  
615 315 7 615 315 8 615 315 9 615 316 A 615 320 A 615 320 0 615 320 1 615 320 3 615 320 4 615  
320 5 615 320 6 615 320 7 615 320 8 615 320 9 615 321 A 615 322 A 615 327 A 615 329 A 615  
331 A 615 332 A 615 332 0 615 332 3 615 332 6 615 332 7 615 332 8 615 332 9 615 333 A 615  
335 A 615 335 8 615 340 A 615 340 0 615 340 1 615 340 2 615 340 3 615 340 4 615 340 5 615 340  
7 615 340 8 615 340 9 615 341 A 615 342 A 615 342 0 615 342 1 615 342 2 615 342 3 615 342 4  
615 342 5 615 342 6 615 342 7 615 342 8 615 343 A 615 344 A 615 350 A 615 350 0 615 350 1  
615 350 2 615 350 3 615 350 4 615 350 5 615 350 6 615 350 7 615 350 8 615 350 9 615 352 A 615  
353 A 615 354 A 615 354 0 615 354 1 615 354 5 615 354 6 615 354 8 615 354 9 615 356 A 615  
360 A 615 361 A 615 365 A 615 366 A 615 367 A 615 370 A 615 371 A 615 372 A 615 372 0 615  
372 1 615 372 2 615 372 3 615 372 5 615 372 6 615 372 7 615 372 8 615 373 A 615 376 A 615 377  
A 615 383 A 615 385 A 615 386 A 615 391 A 615 399 A 615 401 A 615 401 1 615 401 2 615 401  
3 615 401 4 615 401 5 615 401 6 615 401 7 615 416 A 615 416 7 615 416 8 615 421 A 615 432 A  
615 432 1 615 432 3 615 432 6 615 432 7 615 432 8 615 432 9 615 445 A 615 445 1 615 445 2 615  
445 3 615 445 4 615 445 7 615 445 8 615 457 A 615 457 5 615 457 6 615 458 A 615 460 A 615  
463 A 615 507 A 615 507 1 615 507 2 615 507 3 615 507 6 615 507 7 615 524 A 615 524 3 615  
524 4 615 524 5 615 524 7 615 532 A 615 574 A 615 612 A 615 612 0 615 612 1 615 612 2 615  
612 3 615 612 4 615 612 5 615 612 6 615 612 7 615 646 A 615 650 A 615 660 A 615 660 0 615  
660 1 615 660 2 615 660 3 615 660 4 615 660 5 615 660 6 615 660 7 615 660 8 615 660 9 615 661  
A 615 662 A 615 664 A 615 665 A 615 673 A 615 673 0 615 673 1 615 673 2 615 673 3 615 673 6  
615 673 7 615 673 8 615 673 9 615 687 A 615 717 A 615 717 0 615 717 1 615 717 2 615 717 3 615  
717 6 615 717 9 615 726 A 615 731 A 615 733 A 615 733 0 615 733 1 615 733 3 615 733 6 615  
733 7 615 734 A 615 734 0 615 734 1 615 734 2 615 734 3 615 734 4 615 734 5 615 734 6 615 734

8 615 736 A 615 736 0 615 736 2 615 736 5 615 736 6 615 736 7 615 736 8 615 736 9 615 737 A  
615 738 2 615 738 3 615 738 4 615 738 5 615 741 A 615 742 A 615 743 A 615 743 0 615 743 1  
615 743 2 615 743 3 615 743 4 615 743 6 615 743 7 615 743 8 615 743 9 615 744 A 615 747 A 615  
747 0 615 747 3 615 747 4 615 747 5 615 747 8 615 748 A 615 748 1 615 748 2 615 748 3 615 748  
4 615 748 5 615 748 6 615 748 8 615 748 9 615 749 A 615 749 1 615 749 2 615 749 3 615 749 4  
615 749 6 615 749 8 615 761 A 615 761 1 615 761 2 615 761 3 615 762 A 615 762 1 615 762 2 615  
769 A 615 769 0 615 769 1 615 769 2 615 769 3 615 769 4 615 769 5 615 769 7 615 770 A 615 780  
A 615 780 0 615 780 1 615 780 2 615 780 3 615 780 4 615 780 5 615 780 7 615 780 8 615 780 9  
615 781 A 615 782 A 615 783 A 615 795 A 615 831 A 615 832 A 615 833 A 615 834 A 615 835 A  
615 835 0 615 835 1 615 835 4 615 835 5 615 835 6 615 835 7 615 835 8 615 835 9 615 837 A 615  
860 A 615 862 A 615 862 4 615 862 5 615 862 6 615 862 7 615 862 8 615 865 A 615 868 A 615  
870 A 615 870 0 615 870 1 615 870 3 615 870 5 615 871 A 615 871 0 615 871 1 615 871 2 615 871  
4 615 871 5 615 871 6 615 871 7 615 871 8 615 871 9 615 872 A 615 874 A 615 875 A 615 876 A  
615 880 A 615 880 1 615 880 2 615 880 3 615 880 4 615 880 5 615 880 7 615 882 A 615 883 A  
615 884 A 615 885 A 615 886 A 615 886 1 615 886 2 615 886 3 615 886 4 615 886 5 615 886 6  
615 886 7 615 886 9 615 889 A 615 902 A 615 902 0 615 902 1 615 902 2 615 902 6 615 902 7 615  
902 8 615 902 9 615 919 6 615 919 7 615 919 8 615 920 7 615 920 8 615 936 A 615 937 A 615 963  
A 629 255 A 629 255 1 629 262 A 629 262 6 629 262 7 629 401 A 629 401 1

Name of Block Applicant: PATTY BERRIS Signature: PATTY BERRIS

Title: DATA ADMINISTRATOR  
925-355-9268

Phone: 925-901-1934-

Fax:

E-Mail: pb1986@att.com

A. Available Numbers: 395598

B. Assigned Numbers: 471599

C. Total Numbering Resources: 906488

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: 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 months <sup>4</sup>	<u>7458</u>	<u>16</u>	<u>192</u>	<u>132</u>	<u>-589</u>	<u>766</u>						
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## F. Forecast

- Next 12 months <sup>5</sup>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>	<u>1329</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 1329.0

H. Months  
to Exhaust<sup>6</sup>

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	395598	297.666
2	396598	298.418
3	397598	299.171

## I.

Utilization <sup>7</sup>	<u>Assigned Numbers (B)</u>	X 100 =	<u>52.025</u>
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=

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

Explanation: \_\_\_\_\_

<sup>1</sup> 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.

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

<sup>3</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>4</sup>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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To 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)).

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

**BERRIS, PATTY**

**From:** margaret.harrell-simington@neustar.biz  
**Sent:** Monday, March 26, 2018 2:10 PM  
**To:** BERRIS, PATTY; CODE ADMIN SBC INTERNET SVCS  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** , 615-NASHVILLE-TN-1081438 - DENIED PAS - Part 3 Confirmation

**Pooling Administration System**

Dated 26 March 2018

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

Revised: January 4, 2016

**Pooling Administrator's Response/Confirmation**

Tracking Number : 615-NASHVILLE-TN-1081438

Date of Application: 03/26/2018 Effective Date: \_\_\_\_\_  
Date of Receipt: 03/26/2018 Date of Response: 03/26/2018

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL  
(LERG™ Routing Guide¹) 9419  
OCN: \_\_\_\_\_  
Parent Company OCN: 9419

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)<sup>2</sup>:

NSVLTNSTDS0

Rate Center:

NASHVILLE

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:

<sup>1</sup> Telcordia<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and Iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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



- [illegible]

Submit Cancel

**neustar**