

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**NASHVILLE, TENNESSEE**

*RE:*

*Docket No.* 19-00006

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

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

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Teleport Communications of America, LLC – 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 Utility Commission (“TPUC”) to a review NeuStar’s denial of TCAL’s application for an NPA-NXX in the Smyrna rate center in order for TCAL to serve its customer.

1. TCAL is a competitive local exchange carrier certificated by 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 00-429” or the “December Order”). On December 28, 2001, the FCC issued a Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200 (“FCC 01-362”). 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. 00-429 at Paragraphs 22-23; FCC Order No. 01-362 at 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. FCC Order No. 00-429 at Paragraph 29.

7. A TCAL customer, HCA - Information Technology & Services, Inc. dba StoneCrest Medical Center, has requested 3000 consecutive numbers in the Smyrna 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 3000 numbers will be assigned and activated within 180 days.

8. The Smyrna rate center of the 615/629 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 December 19, 2018, 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 Smyrna 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 neither threshold was met.

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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".

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 3000 consecutive numbers. TCAL owns 516-984-0 and 2 with 1140 available numbers across both blocks. A new NPA-NXX will need to be opened.

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.<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.**

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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."

*Id.* (Emphasis supplied).

The FCC also clarified in FCC Order No. 01-362 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 request”.

14. An essential aspect of the “safety valve” provision is the accelerated response that is provided for in FCC Order No. 01-362: 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 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 TPUC 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,

FROST BROWN TODD LLC

By: 

Joshua R. Denton (BPR No. 23248)

Kathryn R. Joy (BPR No. 036072)

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Suite 1900

Nashville, TN 37201

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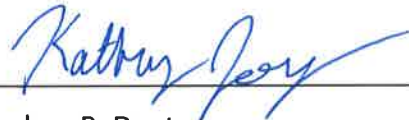
[kjoy@fbtlaw.com](mailto:kjoy@fbtlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8<sup>th</sup>, 2019, 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)



Joshua R. Denton

Kathryn R. Joy

# EXHIBIT A



Hospital Corporation of America®

December 18, 2018

HCA - Information Technology & Services, Inc. dba  
StoneCrest Medical Center  
200 Stonecrest Blvd  
Smyrna, TN 37167

AT&T TNAC,

This Letter of Intent represents a request by StoneCrest Medical Center for a contiguous block of 3000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP service. StoneCrest Medical Center intends to order service, in the SMYRNA rate center, on the STLMO09GT3(P) switch pending AT&T's successful completion of the required testing. StoneCrest Medical Center intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

HCA - Information Technology & Services, Inc. dba StoneCrest Medical Center 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 currently includes 179 hospitals and 120 freestanding surgery centers in 20 states and in the United Kingdom. HCA is currently employing approximately 249,000 employees, with 38,000 physicians and 87,000 nurses. Approximately four to five percent of all inpatient care delivered in the country today is provided by HCA facilities.

Sincerely,



Senior Telecom Analyst  
1 Dell Parkway  
Nashville, TN 37217  
615-344-8849  
[cynthia.bailey@hcahealthcare.com](mailto:cynthia.bailey@hcahealthcare.com)

# EXHIBIT B

Tracking Number: 629-SMYRNA-TN-1134544Thousands-Block Application Form - Part I A  
Revised: January 4, 2016**Full NXX: Pool Replenishment**Type of Application: ☒ New ☐ Change ☐ Disconnect

## General Application Information

## 1.1 Contact Information:

## Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN  
Headquarters Address: 5001 EXECUTIVE PARKWAY 3W200L  
City: San Ramon State: CA ZIP: 94583  
Contact Name: Rowena Brown  
Contact Address: 5001 EXECUTIVE PARKWAY 3W200L  
City: San Ramon State: CA ZIP: 94583  
Phone: 925-543-1526 Fax: 925-355-9268  
E-mail: rb2548@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: mharrell-simington@somos.com

## 1.2 General Information:

Check one : No LRN needed ☒ LRN needed<sup>iii</sup>: ☐

NPA: 629 LATA: 470 OCN<sup>iv</sup>: 114F Parent Company's OCN 7125  
Number of Thousands-Blocks Requested : 3  
Switch Identification (Switching Entity/POI<sup>v</sup>): NSVLTNWMMWD  
Rate Center<sup>vi</sup>: SMYRNA

## 1.3 Dates:

Date of Application<sup>vii</sup>: 12/19/2018 Requested Effective Date<sup>viii</sup>: 02/23/2019Requested Expedited Treatment? (See Section 8.6) Yes ☒ No ☐Expedited Explanation: We are serving as our own AOCN, and will waive the entire 7 calendar day interval to update BIRADS.

☒ 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 : Other

- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 629-xxx-6, 629-xxx-7, 629-xxx-8
- 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<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.

**Rowena Brown**

Signature of Block Applicant

**Senior Network Specialist**

Title

**12/19/2018**

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<sup>TM</sup> 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<sup>TM</sup> 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.

<sup>viii</sup>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).

<sup>ix</sup>Select if you are the current Block Holder.

<sup>x</sup>Select if you are not the current Block Holder

<sup>xi</sup>Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> 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: 629-SMYRNA-TN-1134544Date: Wednesday, December 19, 2018OCN: 114FCompany Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TNRate Center: SMYRNAList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 615-984-0 615-984-2Name of Block Applicant: Rowena BrownSignature: Rowena BrownTitle: Senior Network SpecialistPhone: 925-543-1526-Fax: 925-355-9268E-Mail: rb2548@att.comA. Available Numbers: 1148B. Assigned Numbers: 841C. Total Numbering Resources: 2000D. 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 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<sup>4</sup>

|          |           |          |          |          |           |
|----------|-----------|----------|----------|----------|-----------|
| <u>0</u> | <u>41</u> | <u>0</u> | <u>0</u> | <u>0</u> | <u>12</u> |
|----------|-----------|----------|----------|----------|-----------|

F. Forecast - Next 12 months<sup>5</sup>

|             |             |             |          |          |          |          |          |          |          |          |          |
|-------------|-------------|-------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| <u>1009</u> | <u>1009</u> | <u>1009</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> | <u>9</u> |
|-------------|-------------|-------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 509.0H. Months to Exhaust<sup>6</sup> = 
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

| Block Requested | Available Numbers | Months To Exhaust |
|-----------------|-------------------|-------------------|
| <u>1</u>        | <u>1148</u>       | <u>2.255</u>      |
| <u>2</u>        | <u>2148</u>       | <u>4.22</u>       |
| <u>3</u>        | <u>3148</u>       | <u>6.185</u>      |

I. Utilization<sup>7</sup> =
$$\frac{\text{Assigned Numbers (B)}}{\text{X 100}} = \underline{42.05}$$

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))

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

Revised: January 4, 2016

Tracking Number: 629-SMYRNA-TN-1134544  
Full NXX: Pool Replenishment

Type of Application: ☐ New ☐ Change<sup>1</sup> ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

Headquarters Address: 5001 EXECUTIVE PARKWAY 3W200L

City, State, Zip: San Ramon, CA, 94583

Contact Name: Rowena Brown

Contact Address: 5001 EXECUTIVE PARKWAY 3W200L

City: San Ramon

State: CA

ZIP: 94583

Phone: 925-543-1526

Fax : 925-355-9268

E-mail: rb2548@att.com

Code Administrator:<sup>2</sup>

Name: Patricia Soderland

Address: 21575 Ridgeway Circle

City: Sterling

State: VA

ZIP: 20166

Phone: 571-434-5348

Fax : 571-434-5502

1.2 NPA: 629 NXX:<sup>3</sup> 7125 LATA: 470 OCN:<sup>4</sup> 114F Parent Company's

Switching Identification (Switching Entity/POI) <sup>5</sup> NSVLTNWMWMD

Locality/City/Wire Center:

Rate Center:<sup>6</sup> SMYRNA

Homing Tandem Operating Co.<sup>7</sup>: BELLSOUTH

Tandem Homing  
CLLI<sup>TM8</sup>: NSVLTNWM92T

1.3 Dates

Date of Application: 12/19/2018

Requested Effective Date:<sup>9,10</sup>  
02/23/2019

☒ 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 ☐

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

Expedited Explanation: We are serving as our own AOCN, and will waive the entire 7 calendar day interval to update BIRDS.

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): CAP OR CLEC

b) Type of service (e.g., Cellular - Type 2): Other

c) Code Assignment Preference (Optional) 629-xxx-6, 629-xxx-7, 629-xxx-8

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company<sup>11</sup> ☐ Switching Id ☐ Rate Center ☐ Tandem Homing CLLI

☐ OCN-Inter-company<sup>12</sup> ☐ 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: <sup>13</sup> Yes ☐ No ☒

1.6 NPA Jeopardy Criteria Apply: Yes ☐ No ☒

1.7 Code request for new service (Explain): **POOL REPLENISHMENT**

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 application<sup>14</sup>.

**Rowena Brown**

Signature of Code Applicant

**Senior Network Specialist**

Title

**12/19/2018**

Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

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

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

<sup>4</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 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 Telcordia<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This 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<sup>®</sup> Location Code (CLLI<sup>TM</sup> Code) of the applicant's switch or POI. Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.

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

<sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Code 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.

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

<sup>11</sup>Select if you are the current Code Holder

<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>The 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.

<sup>14</sup>An incomplete form may result in delays in processing this request.

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 629-SMYRNA-TN-1134544

Date of Application: 12/19/2018 Effective Date: \_\_\_\_\_

Date of Receipt: 12/19/2018 Date of Response: 12/19/2018

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

(LERG<sup>TM</sup> Routing Guide<sup>1</sup>) 114F

OCN: \_\_\_\_\_

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: mharrell-simington@somos.com

NPA-NXX or  
NPA-NXX-X : \_\_\_\_\_

Block Assigned: 1

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>:

NSVLTNWMWMD

Rate Center:

SMYRNA

☒ Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

☐ Request Withdrawn.

Explanation:

☐ Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<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.

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

RE:

Docket No. \_\_\_\_\_

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

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**ORDER APPROVING REQUEST OF TELEPORT COMMUNICATIONS  
AMERICA, LLC ("TCAL") 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") 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 Smyrna rate center served by switch identification STLMO09GT3.

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