

BUTLER | SNOW

October 29, 2020

**VIA ELECTRONIC FILING**

Hon. Kenneth C. Hill, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

**RE: *Petition of Verizon Access for Expedited Review of Denial of Application for Numbering Resources*; Docket No. 20-00123**

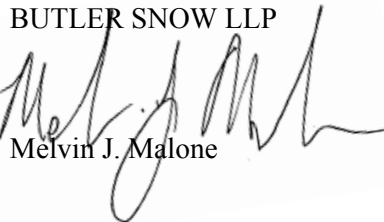
Dear Chairman Hill:

Attached for filing please find the *Petition of Verizon Access for Expedited Review of Denial of Application for Numbering Resources*, along with exhibits.

As required, one (1) hard copy will be mailed to your office. A check in the amount of \$25.00 for the required filing fee will also be delivered. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

Attachments

*The Pinnacle at Symphony Place  
150 3<sup>rd</sup> Avenue South, Suite 1600  
Nashville, TN 37201*

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BUTLER SNOW LLP

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

|  |   |                                   |
|--|---|-----------------------------------|
| <b>RE:</b>   | ) |                                   |
|  | ) |                                   |
| <b>PETITION FOR EXPEDITED REVIEW<br/>OF GROWTH CODE DENIAL BY THE<br/>NUMBER POOLING ADMINISTRATOR<br/>– MEMPHIS RATE CENTER</b> | ) | <b>DOCKET NO. <u>20-00123</u></b> |
|  | ) |                                   |
|  | ) |                                   |

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**PETITION OF VERIZON ACCESS FOR EXPEDITED REVIEW OF  
DENIAL OF APPLICATION FOR NUMBERING RESOURCES**

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MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (“Verizon Access”) respectfully requests that the Tennessee Public Utility Commission (“Commission”) review the denial by the Pooling Administrator (“Somos”) of Verizon Access’ application for a Thousand Block of telephone numbers in the Memphis, Tennessee rate center, overturn that decision, and order that a Thousand Block be assigned to Verizon Access.

**PARTIES**

1. Verizon Access is a certificated competitive local exchange company that provides local exchange service and exchange access service in Tennessee.
2. Somos is an independent non-governmental entity that is responsible for administering and managing the numbering resources in pooling areas. *See* 47 C.F.R. § 52.20(d).

**BACKGROUND AND REQUEST FOR RELIEF**

3. A large business customer is expanding its operations and has asked that Verizon Access provide 1,000 consecutive telephone numbers in the Memphis rate center. To accommodate its internal dialing plan, the customer has requested that the last four digits of the telephone numbers not start with a “0” or a “9.” A copy of the customer’s letter explaining the circumstances is attached as Exhibit 1.

4. Because Verizon Access does not have 1,000 consecutive numbers in its inventory, it applied on October 19, 2019 to Somos for a Thousand Block in the Memphis rate center. Verizon Access's application (Part 1A) is attached as Exhibit 2.

5. Somos denied Verizon Access's request on the same day it was submitted. The request was denied because Verizon Access did not meet one of the FCC's two criteria that Somos applies, even though Verizon Access does not have the numbering resources needed to satisfy its customer's request. Specifically, the Memphis rate center's months-to-exhaust calculation was 41.73 months – higher than the FCC's six month criterion, but Verizon Access' number utilization of 84.14% exceeded the FCC's 75% criterion. The Months-to-Exhaust Report reflecting these calculations is attached as Exhibit 3. Somos' denial of Verizon Access' application is attached as Exhibit 4.

6. The FCC has delegated authority to the Commission to address Somos' denial of a request for numbering resources, stating that “[w]e agree ... that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources.”<sup>1</sup> Moreover, the FCC has determined that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request.” Specifically, states “may grant requests for customers seeking contiguous blocks of numbers.”<sup>2</sup>

7. Somos' denial of sufficient numbering resources to Verizon Access to meet its customer's request is inconsistent with the FCC's position that “[u]nder no circumstances should

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<sup>1</sup> *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 95-116, ¶ 61(2001).

<sup>2</sup> *Id.* ¶ 64.

consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”<sup>3</sup> By refusing to grant numbering resources sufficient to meet the needs of Verizon Access’s customer, Somos is preventing this customer from obtaining the service it wants from the carrier of its choice.

8. Verizon Access’s request for a Thousand Block to meet its customer’s request fits squarely within the framework established by the FCC for “safety valve” requests that the Commission is authorized to grant. Verizon Access respectfully requests that the Commission direct Somos to assign a Thousand Block for the Memphis rate center so that Verizon Access can satisfy its customer’s request.

WHEREFORE, Verizon Access respectfully requests that the Commission review Somos’ decision to deny Verizon Access’s request for additional numbering resources, overturn that decision, and direct Somos to assign Verizon Access a Thousand Block in the Memphis rate center.

Respectfully submitted on October 29, 2020.

BUTLER SNOW LLP

By: 

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*Counsel for MCI metro Access Transmission  
Service Corp. d/b/a Verizon Access  
Transmission Services*

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<sup>3</sup> *Numbering Resource Optimization*, Second Report and Order 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, CC Docket No. 99-200, CC Docket No. 96-98, ¶ 61 (2000).



**RAYMOND JAMES®**

9/29/20

To: Verizon Business Services

**Raymond James & Associates** in **Memphis TN** is in need of 1,000 contiguous numbers to **for an expansion at the site and we require a single block for PBX programming.** In order to successfully implement this project, we require a contiguous range of 1,000 numbers where the range does not start with "9" or "0" (i.e.: NPA-NXX-9XXX) due to our internal dialing plan on our phone system. The service address for these numbers will be **889 Ridge Lake Blvd, Memphis TN 38120**, which is in the **Memphis TN** rate center.

**Raymond James & Associates** has placed an order with Verizon Business for services requiring 1,000 contiguous numbers to be put in service by **12/1/2020**.

The point of contact for this request is

Colt Lester

[Colt.lester@raymondjames.com](mailto:Colt.lester@raymondjames.com)

901-579-2779

Sincerely,



Lisa Bialaski

Tech Communications Specialist

727-567-3136

[Lisa.bialaski@raymondjames.com](mailto:Lisa.bialaski@raymondjames.com)



Tracking Number: **901-MEMPHIS-TN-1316809**

Thousands-Block (NPA-NXX-X) Application - Part 1A  
Revised: October 31, 2019

**Individual Block  
Request**

Type of Application: ☒ New ☐ Change <sup>i</sup> ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC**  
Headquarters Address: **1 Verizon Way**  
City: **basking ridge** State: **NJ** ZIP: **07920**  
Contact Name: **Chanda Brown**  
Contact Address: **1 Verizon Way**  
City: **basking ridge** State: **NJ** ZIP: **07920**  
Phone: **908-559-2339** Fax:  
E-mail: **chanda.vyas2@verizon.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: **925-420-0346** Fax: **925-420-0377**  
E-mail: **mharrell-simington@somos.com**

1.2 General Information:

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

NPA: **901** LATA: **468** OCN<sup>iv</sup>: **7229** Parent Company's OCN **7229**

Number of Thousands-Blocks Requested : **1**

Switch Identification (Switching Entity/POI<sup>v</sup>): **MMPHTN32DS0**



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

1.3 Dates:

Date of Application<sup>vii</sup>:  
10/19/2020

Requested Effective Date<sup>viii</sup>:  
11/19/2020

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 : 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) 901-560-3
- 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 a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

**Chanda Brown**

**Engr III Spec-Ntwk Eng&Ops**

**10/19/2020**

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 (SP) 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 (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP 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<sup>xi</sup>. The Operating Company Number (OCN) assigned to the SP 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 (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) 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 (SP) 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. SPs 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 (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are 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 (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are

returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-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 (PA) is available to assist in completing these forms.

<sup>iii</sup>A Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

<sup>iv</sup>Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) 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 Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> Code of the Switching Entity/POI.

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

<sup>vii</sup>Acknowledgment and indication of disposition of this application shall 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 Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

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

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

<sup>xi</sup>iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>TM</sup>, CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and TPM<sup>TM</sup> Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.



Thousands-Block Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 2**Revised: October 31, 2019**

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **901-MEMPHIS-TN-1316809**Date: **Monday, October 19, 2020** OCN: **7229** Company Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC**Rate Center: **MEMPHIS**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: **901-248-0, 901-248-1, 901-248-2, 901-248-3, 901-248-4, 901-248-5, 901-248-6, 901-248-7, 901-248-8, 901-248-9, 901-291-1, 901-291-2, 901-291-3, 901-291-4, 901-291-5, 901-291-6, 901-291-7, 901-291-8, 901-462-0, 901-462-2, 901-462-3, 901-462-8, 901-462-9, 901-620-2, 901-620-3, 901-620-4, 901-620-5, 901-712-0, 901-712-1, 901-712-2, 901-712-3, 901-712-4, 901-712-5, 901-712-6, 901-712-7, 901-712-8, 901-712-9, 901-251, 901-252,**Name of Block Applicant: **Chanda Brown**Signature: **Chanda Brown**Title: **Engr III Spec-Ntwk Eng&Ops**Phone: **908-559-2339-**

Fax:

E-Mail: **chanda.vyas2@verizon.com**A. Available Numbers<sup>3</sup>: **7414**B. Assigned Numbers: **47964**C. Total Numbering Resources<sup>4</sup>: **57000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>5</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      **37**      **67**      **67**      **-63**      **33**      **-15**

History -  
Previous 6  
months<sup>6</sup>

F. Forecast -  
Next 12  
months<sup>7</sup>

**1021    2    2    2    2    2    2    2    2    2    2    2**

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: **177.667**

H. Months  
to Exhaust<sup>9</sup>  
= 
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

Average Monthly Forecast (G)

Block Requested

**1**

Available Numbers

**7414**

Months To Exhaust

**41.73**

I.

Utilization<sup>10</sup>  
=

Assigned Numbers (B)

X 100 =

**84.147**

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 (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

<sup>2</sup>List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

<sup>3</sup>The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>4</sup>The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically

populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>5</sup>Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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>6</sup>Net change in Telephone Numbers (TN) 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>7</sup>Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>10</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).





Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 901-MEMPHIS-TN-1316809

Date of Application: 10/19/2020 Effective Date: \_\_\_\_\_  
Date of Receipt: 10/19/2020 Date of Response: 10/19/2020

Service Provider Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC  
(LERG<sup>TM</sup> Routing 7229  
Guide<sup>1</sup>) OCN: \_\_\_\_\_  
Parent Company OCN: 7229

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-420-0346  
Signature of Pooling Administrator  
Margaret Harrell-Simington Fax: 925-420-0377  
Name (print)  
Email: mharrell-simington@somos.com

       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>: MMPHTN32DS0  
Rate Center: MEMPHIS

X 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 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.**

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Request Withdrawn.

Explanation:

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Assignment Activity Suspended by Administrator.

Explanation:

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Remarks:

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<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.