

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

October 14, 2021

RE:

Docket No. 21-00118

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

**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 numbering determinations, petitions the Tennessee Public Utility Commission (“Commission”) to review a recent denial of TCAL’s application for three consecutive thousands-block number (615-XXX-4XXX, 615-XXX-5XXX, and 615-XXX-6XXX) in the Springfield rate center served by switch identification NSVLTNWMWMD in order for TCAL to serve its customer. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”)¹ and/or the Pooling Administrator (“PA”),² depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”³ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.⁴ Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to

¹ Currently Somos, Inc.

² Also currently Somos, Inc.

³ See, e.g., 47 C.F.R. §52.15.

⁴ See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“Third NRO Order”).

provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so.

In support of this Petition, TCAL states:

1. TCAL is a competitive local exchange carrier certificated by the Commission to provide telecommunications services in Tennessee.

2. NANPA and the PA are independent, non-governmental entities 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 NANPA and/or the PA. 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, HCA Healthcare, Inc. d/b/a Northcrest Medical Center, has requested 3,000 consecutive numbers in the Springfield 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 3,000 numbers will be assigned and activated within 180 days. The Springfield inventory pool has no blocks (zero inventory), thus TCAL must open a new code. TCAL will activate 3 consecutive blocks, for the customer, and replenish the pool with the remaining 7 blocks.

8. The Springfield rate center in 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 NANPA and/or the PA⁵.

9. On October 6, 2021 TCAL submitted a “Thousand Block Application Form Part 1A”, and a “Months-to-Exhaust and Utilization Certification Worksheet – TN Level” to NANPA and/or the PA for three consecutive thousand-blocks in the Springfield rate center served by switch

⁵ 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”.

identification NSVLTNWMWMD 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". NANPA and/or the PA 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 "[y]ou do not meet the MTE and/or Utilization requirements"

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 3,000 consecutive numbers. TCAL owns 615-985-0XXX and 9XXX with approximately 1,400 numbers available between the 2 blocks.

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/or the PA to handle numbering resource administration.⁶ 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:

⁶ 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."

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 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 Commission's review of the decision of NANPA and/or the PA 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, "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." 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 review the decision of NANPA and/or the PA denying TCAL's request for additional numbering resources and order NANPA and/or the PA s to provide the requested numbers to meet the specific requirements of TCAL's customer.

Respectfully submitted,

Frost Brown Todd, LLC

By: 

Jeremy R. Goolsby (#034505)
150 Third Avenue South
Suite 1900
Nashville, TN 37201
(615) 251-5550
jgoolsby@fbtlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2021 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
Somos
46000 Center Oak Place
Sterling, VA 20166
Beth.Sprague@Somos.com



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

IN RE:

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

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Docket No. _____

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

This matter came before the Tennessee Public Utility Commission ("Commission") for consideration of the *Petition for Review of Growth Code Denial by the Numbering Pooling Administrator – Springfield Rate Center*, filed by Teleport Communications of America, LLC - TN ("TCAL"). After consideration of the facts contained in the record and the applicable law, TRA grants TCAL's Petition and reverses the denial by NANPA and/or the PA of TCAL's request for additional numbering resources.

IT IS THEREFORE ORDERED THAT:

1. The decision of NANPA and/or the PA to deny TCAL's request for additional numbering resources is reversed as stated herein.
2. NANPA and/or the PA are ordered to assign the requested numbering resources – specifically, three consecutive thousands-block number (615-XXX-4XXX, 615-XXX-5XXX, and 615-XXX-6XXX) in the Springfield rate center served by switch identification NSVLTNWMWMD – to TCAL.



October 5, 2021

HCA Healthcare, Inc. DBA
Northcrest Medical Center
100 Northcrest Dr
Springfield, TN 37172

AT&T TNAC,

This Letter of Intent represents a request by Northcrest Medical Center for a contiguous block of 3,000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP service. Northcrest Medical Center intends to order service in the Springfield rate center, on the SPFDTNMADS0 switch, pending AT&T's successful completion of the required testing. Northcrest Medical Center intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

HCA Healthcare, Inc. dba Northcrest Medical Center currently has no requirements or restrictions on the numbers assigned.

Founded in 1968, HCA Healthcare is ranked 63 in Fortune 500 and has been named one of the "World's Most Ethical Companies" for ten years in a row. As one of the nation's leading providers of healthcare, HCA Healthcare is comprised of 185 hospitals and approximately 2,000 sites of care including surgery centers, freestanding ERs, urgent care centers and physician clinics in 21 states and the United Kingdom. Currently, HCA Healthcare employs approximately 270,000 colleagues, 38,000 physicians and 94,000 registered nurses. Each year approximately five percent of all U.S. hospital services happen at an HCA Healthcare facility.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Bailey".

Senior Telecom Analyst
615-344-8849
cynthia.bailey@hcahealthcare.com

Central Office Code (NPA-NXX) Application - Part 1
Revised: October 31, 2019

Tracking
Number: 615-SPRINGFLD-TN-1573291

Full NXX: Pool
Replenishment

Type of
Application: ☒ New ☐ Change¹
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

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

Headquarters
Address: One AT&T Way.

City, State, Zip: Bedminster, NJ, 07920

Contact Name: Luke Riga

Contact
Address: One AT&T Way.

City: Bedminster State: NJ ZIP: 07920

Phone: 908-234-6795 Fax : 908-234-8044

E-mail: lriga@att.com

Code Administrator:²

Name: Patricia Soderland

Address: 2411 Dulles Corner Park Suite 250

City: Herndon State: VA ZIP: 20171

Phone: 571-363-3828 Fax : 571-363-3838

NXX:³ LATA: 470
1.2 NPA: 615 OCN:⁴ 114F Parent Company's
OCN(s) 7125

Switching Identification (Switching Entity/POI)

⁵NSVLTNWMWMD

Locality/City/Wire Center:

Rate Center:⁶SPRINGFLD

Homing Tandem Operating Co.⁷: AT&T

Tandem Homing
CLLI^{TM8}: NSVLTNWM92T

1.3 Dates

Date of Application: 10/06/2021

Requested Effective

EXHIBIT B

Date:^{9,10}
12/11/2021

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment Yes _____ No X

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

Expedited Explanation:

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

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

c) Code Assignment Preference (Optional) 615-xxx-4, 615-xxx-5, 615-xxx-6

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem
Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservations

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 It is the Code Applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting a CO Code 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) posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.¹⁴

Luke Riga

Signature of Code Applicant

Manager

Title

10/06/2021

Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from the North American Numbering Plan Administrator (NANPA).

³The NXX field is required for any Central Office (CO) Code (NPA-NXX) request in which there is a change or the CO Code is being returned.

⁴Operating 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 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 Telecom Routing Administration (TRA) on 732-699-6700.

⁵This 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 eleven-character iconectiv[®] Common Language Location Identification (CLLI[™]) Code of the applicant's Switching Entity/POI. (iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.)

⁶Rate Center name shall be a tariffed Rate Center associated with toll billing.

⁷Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

⁹Central Office (CO) 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 CO Code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

¹¹Select if you are the current Central Office (CO) Code Holder.

¹²Select if you are not the current Central Office (CO) Code Holder.

¹³The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling and shall leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Tracking Number: 615-SPRINGFLD-TN-1573291

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

Full NXX: Pool
Replenishment

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN
Headquarters Address: One AT&T Way
City: Bedminster State: NJ ZIP: 07920
Contact Name: Luke Riga
Contact Address: One AT&T Way
City: Bedminster State: NJ ZIP: 07920
Phone: 908-234-6795 Fax: 908-234-8044
E-mail: lriga@att.com

Pooling Administrator:ⁱⁱ

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@nanpa.com

1.2 General Information:

Check one : No LRN needed X LRN neededⁱⁱⁱ: _____

NPA: 615 LATA: 470 OCN^{iv}: 114F Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI^v):

NSVLTNWMMWD

Rate Center^{vi}: SPRINGFLD

1.3 Dates:

Date of Application^{vii}:
10/06/2021

Requested Effective Date^{viii}:
12/11/2021

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) 615-xxx-4, 615-xxx-5, 615-xxx-6
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any ____
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request:

Initial block for rate center : Yes ____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

☐ OCN: Intra-company^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ Effective Date

Change block : Yes ____ If Yes, list NPA-NXX-X ____

1.6 Block Return :

- a) Is this block Contaminated: Yes ____ No ____
- b) If Yes how many TNs are NOT available for assignment : ____
- c) Have all new Intra SP ports been completed in the NPAC: Yes ____ No ____
- d) Has this block been protected from further assignment: Yes ____ No ____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting 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.

Luke Riga

Manager

10/06/2021

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®) LERGTM Routing Guide^{xi}. 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:

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

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

ⁱⁱⁱA Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}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).

^vThis 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 CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}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.

^{viii}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).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

(Thousands-Block Number Pooling Growth Block Request)

[illegible]

Next 12
months⁷

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: 520.0

H. Months
to Exhaust⁹
= $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	1472	2.831
2	2472	4.754
3	3472	6.677

I.
Utilization¹⁰
= $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{26.2}$

Explanation: _____

¹ 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.

² 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.

³ 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).

⁴ 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).

⁵Quantity 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).

⁶Net 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.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This 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)).

¹⁰This 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 : 615-SPRINGFLD-TN-1573291

Date of Application: 10/06/2021 Effective Date: _____
 Date of Receipt: 10/06/2021 Date of Response: 10/06/2021

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: 925-420-0346
 Signature of Pooling Administrator
Margaret Harrell-Simington Fax: 925-420-0377
 Name (print)
 Email: mharrell-simington@nanpa.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)²: NSVLTNWWMWD
 Rate Center: SPRINGFLD

☒ 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 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.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² 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.