

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE  
February 17, 2022**

*RE:*

**Docket No. 22-00015**

*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 two consecutive thousands-blocks 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”)<sup>2</sup> and/or the Pooling Administrator (“PA”),<sup>3</sup> 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,”<sup>4</sup> and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.<sup>5</sup> Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to 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:

---

<sup>2</sup> Currently Somos, Inc.

<sup>3</sup> Also currently Somos, Inc.

<sup>4</sup> See, e.g., 47 C.F.R. §52.15.

<sup>5</sup> 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*”).

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 - TriStar Northcrest Medical Center, has requested 2000 consecutive numbers in the Springfield rate center. A copy of the letter outlining the request is attached as Exhibit "A."<sup>6</sup>

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 PA<sup>7</sup>.

9. On February 16, 2022, 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 two consecutive thousand-blocks in the Springfield rate center served by switch identification STLSMO09GT3 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

---

<sup>6</sup> Exhibit A consists of: the customer's letter requesting specific numbering resources that are not available; and confirmation that the alternate numbering resources that are the subject of this Petition are acceptable to the customer.

<sup>7</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".

(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 2000 consecutive numbers. TCAL owns 615-698-5, 6, 7 and 8 with approximately 900 numbers available amongst the 4 blocks and 615-985-0 and 9 with approximately 1300 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.<sup>8</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.**

---

<sup>8</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 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 to provide the requested numbers to meet the specific requirements of TCAL’s customer.

Respectfully submitted,

FROST BROWN TODD, LLC

By: /s/ Jeremy R. Goolsby  
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 February 18, 2022 a copy of the foregoing document was served on the parties of record, via the method indicated:

<input type="checkbox"/> Hand	Ms. Beth Sprague
<input checked="" type="checkbox"/> U.S. Mail	Somos
<input type="checkbox"/> Facsimile	46000 Center Oak Place
<input type="checkbox"/> Overnight Mail	Sterling, VA 20166
<input type="checkbox"/> Electronic Mail	Beth.Sprague@Somos.com

/s/ Jeremey R. Goolsby

0139277.0664648 4865-1466-0111v1

January 27, 2022

**HCA - Information Technology & Services, Inc.**  
**TriStar NorthCrest Medical Center**  
**100 NorthCrest Dr**  
**Springfield, TN 37172**

AT&T TNAC,

This Letter of Intent represents a request by TriStar NorthCrest Medical Center for a contiguous block of 2,000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP Service. TriStar NorthCrest Medical Center intends to order service in the Springfield rate center, on the STLSMO09GT3 switch, pending AT&T's successful completion of the required testing. TriStar NorthCrest Medical Center intends to activate these numbers within 180 days from receipt of the numbers from AT&T.

TriStar NorthCrest Medical Center currently has technical number restrictions and would prefer:

615-384-1XXX-8XXX  
615-382-1XXX-8XXX

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 186 hospitals and 2,000 sites of care in 21 states and in the United Kingdom. HCA is currently employing approximately 280,000 employees. Approximately five percent of all inpatient care delivered in the country today is provided by HCA facilities.

Sincerely,



Telecom Analyst  
1 Dell Parkway  
Nashville, TN 37217  
615-344-7668  
[brooke.turner2@hcahealthcare.com](mailto:brooke.turner2@hcahealthcare.com)

**EXHIBIT A**



Tracking Number: **615-SPRINGFLD-TN-1643927**

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: **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: **Two Tower Center Boulevard, 20th Floor**  
City: **East Brunswick** State: **NJ** ZIP: **08816**  
Phone: **925-420-0346** Fax: **925-420-0377**  
E-mail: **mharrell-simington@nanpa.com**

1.2 General Information:

**EXHIBIT B**

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

NPA: 615 LATA: 470 OCN<sup>iv</sup>: 114F Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 2

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

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

### 1.3 Dates:

Date of Application<sup>vii</sup>: 02/16/2022

Requested Effective Date<sup>viii</sup>: 03/19/2022

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) 615698-3,4 615698-4.3.2.1  
2000CONSECUTIVE TNs
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any 615-XXX-0,9
- 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](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

**02/16/2022**

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™ 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>™</sup>, CLLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and TPM<sup>™</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: **615-SPRINGFLD-TN-1643927**

Date: **Wednesday, February 16, 2022** OCN: **114F** Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - TN**

Rate Center: **SPRINGFLD**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: **615-698-5, 615-698-6, 615-698-7, 615-698-8, 615-985-0, 615-985-9,**

Name of Block Applicant: **Rowena Brown** Signature: **Rowena Brown**

Title: **Senior Network Specialist**

Phone: **925-543-1526-**

Fax: **925-355-9268**

E-Mail: **rb2548@att.com**

A. Available Numbers<sup>3</sup>: **2301**

B. Assigned Numbers: **3694**

C. Total Numbering Resources<sup>4</sup>: **6000**

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 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>6</sup>	<b><u>3020</u></b>	<b><u>50</u></b>	<b><u>0</u></b>	<b><u>100</u></b>	<b><u>0</u></b>	<b><u>102</u></b>						
F. Forecast - Next 12 months <sup>7</sup>	<b><u>2000</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>	<b><u>300</u></b>

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: **583.333**

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

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>2301</b>	<b>3.945</b>
<b>2</b>	<b>3301</b>	<b>5.659</b>

I. Utilization<sup>10</sup> = 
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \mathbf{\underline{61.567}}$$

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)).



**From:** mharrell-simington@nanpa.com  
**Sent:** Wednesday, February 16, 2022 8:29 PM  
**To:** CODE ADMIN ATT CLEC; BROWN, ROWENA R  
**Cc:** pa\_part3@nanpa.com  
**Subject:** , 615-SPRINGFLD-TN-1643927 DENIED PAS - Part 3A Confirmation

## Pooling Administration System

Dated 16 February 2022

### Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 615-SPRINGFLD-TN-1643927

Date of Application: 02/16/2022 Effective Date: \_\_\_\_\_  
Date of Receipt: 02/16/2022 Date of Response: 02/16/2022

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN  
(LERG™ Routing Guide<sup>1</sup>) 114F  
OCN: \_\_\_\_\_  
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)<sup>2</sup>:

**NSVLTNWMWMD**

Rate Center:

**SPRINGFLD**

**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.**

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> 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.

<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.