

BAKER DONELSON

SUITE 2000 • 1600 WEST END AVENUE • NASHVILLE, TENNESSEE 37203 • 615.726.5600 •
bakerdonelson.com

LEA KROLL, PARALEGAL
Direct Dial: 615.726.5779
Direct Fax: 615.744.5779
E-Mail Address: lkroll@bakerdonelson.com

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April 5, 2022

22-00027

Tennessee Public Utility Commission
ATTN: Tory Lawless
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: *Petition for Review of Growth Code Denial*
By BellSouth Telecommunications LLC d/b/a AT&T Tennessee ("AT&T")

Dear Ms. Lawless:

Enclosed for your files please find a copy of the Petition for Review of Growth Code Denials (the "Petition") filed on behalf of AT&T, as well as a check in the amount of \$25.00 for the filing fee. A copy of the Petition was filed via electronic mail as of this date. Please return a file-stamped copy of the Petition to Mr. Freeman in the self-addressed envelope provided for your use.

Please let us know if you have any questions or need anything further from us on this matter. Thank you.

Sincerely,

/s/ *Lea Kroll*
Lea Kroll
Paralegal

LAK:lk
Enclosures

cc (via email): Ryan A. Freeman

LAK 4860-9061-6340
2907737-000051

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE
April 5, 2022**

RE:

Docket No. 22-00027

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

**PETITION OF BELL SOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T
TENNESSEE FOR REVIEW OF CENTRAL OFFICE CODE DENIAL**

BellSouth Telecommunications LLC d/b/a AT&T Tennessee (“AT&T”), 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 AT&T’s application for two consecutive thousands-blocks in the Springfield rate center served by switch identification SPFDTNMADS0 in order for AT&T 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 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, AT&T states:

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*”).

1. AT&T is an incumbent 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. An AT&T customer, HCA - TriStar Northcrest Medical Center, has requested 2,000 consecutive numbers in the Springfield rate center. A copy of the letter outlining the request is attached as Exhibit 1.

8. On March 16, 2022, AT&T 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 SPFDTNMADS0 (specifically 615-698-1XXX and 615-698-2XXX) to satisfy the customer request. A copy of this Part 1A application is attached as Exhibit 2. The accompanying MTE Certification Worksheet is attached as Exhibit 3.

9. NANPA denied AT&T’s request on March 16, 2022, stating “[y]ou do not meet the MTE and/or utilization requirements...,” even though AT&T does not have the numbering resources needed to satisfy its customer’s request. A copy of this denial is attached as Exhibit 4. Although AT&T has adequate telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, AT&T’s existing resources cannot satisfy this customer’s need for 2000 consecutive numbers.

10. As a result of the denial for additional numbering resources, AT&T is unable to provide the telecommunications services requested by its customer.

11. In setting its policy for the assignment of telephone numbers, the FCC designated NANPA and/or the PA to handle numbering resource administration.⁵ If a numbering resource administrator withholds numbering resources from a carrier, the FCC has specifically authorized state Commissions to overturn those decisions for reasonable cause. That authority is specifically set out in the relevant FCC Rule, 47 C.F.R. §52.15 (g) (3) (iv), which states:

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an OCN. The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory Commission. **The state Commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.**

Id. (Emphasis supplied). The FCC also clarified in the FCC Order No. 00-249 Order that carriers may appeal to states using a “safety valve” mechanism (paragraphs 57-66). The FCC contemplated the need for and gave structure to states to respond when denials failed to consider a “specific customer request”.

12. 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.

⁵ 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.”

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.

13. AT&T 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 AT&T'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, AT&T. Thus, AT&T's request fits squarely within the framework established by the FCC for "safety valve" requests that the Commission is authorized to grant.

Relief Sought

For these reasons, AT&T respectfully requests the Commission to review the decision of NANPA and/or the PA denying AT&T's request for additional numbering resources and order NANPA and/or the PA to provide the requested numbers two consecutive thousand-blocks in the Springfield rate center served by switch identification SPFDTNMADS0 (specifically 615-698-1XXX and 615-698-2XXX) to meet the specific requirements of AT&T's customer.

Respectfully submitted on April 5, 2022,

BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, PC

By /s/ Ryan A. Freeman

Ryan A. Freeman (BPR 033299)

633 Chestnut Street, Suite 1900

Chattanooga, TN 37450

Telephone: 423.209.4181

Facsimile: 423.752.9254

rfreeman@bakerdonelson.com

*Counsel for Bellsouth Telecommunications LLC
d/b/a AT&T Tennessee*

EXHIBIT 1

Maria D. Ruiz

I am requesting from AT&T 2,000 new DID telephone numbers within the same exchange for TriStar NorthCrest Medical Center located at 100 Northcrest Drive Springfield, TN 37172. In September 2021 HCA Healthcare purchased the facility, we have been going through many different projects at the facility, one project is to upgrade the existing telephone system to Cisco and redo the current dialing plan throughout the hospital. Currently the hospital has 940 DIDs, in four different exchanges which makes it difficult for the staff and community to call into the hospital. Also we have many doctor offices that have assigned numbers that will be moving from the hospital telephone system which they will be taking their DID numbers, which will take away from the 940 numbers. Another issue we are trying to address is renumbering all the patient room telephones to match the room numbers and other areas of the hospital such as departments and floors to match the new DID numbers.

Currently the hospital is utilizing nearly all of the 940 numbers they currently have assigned on their three PRIs, there is very little room for growth. Our goal is to have one exchange for the facility to make it easier for the staff and community to be able to access the hospital. Also we need to have future growth within the same exchange to prevent having multiple exchanges like what the hospital is challenged with today.

Currently the hospital has the following three exchanges assigned on their PRIs are 615-382, 384, 212 & 433. The majority of the numbers are in 615-384 & 382 exchange. The rest of the numbers are in the 344 & 212 exchanges.

The request to AT&T for the 2,000 numbers, if possible we would like numbers in the 615-212 exchange. We would prefer not to have any numbers that start with a "0" or a "9". If there are numbers in either 615-384 or 382 that would equal 2,000 numbers that would work as well.

Let me know if you need anything else,

Bill
William F. Mueller
Telecom Manager
HCA TriStar Information Technology Group
william.mueller@hcahealthcare.com
(p) 615-661-1720 (m) 615-405-8232
5653 Frist Blvd, Suite 441 Hermitage, TN 37076

EXHIBIT 2

Tracking Number: **615-SPRINGFLD-TN-1653899**

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

**Individual Block
Request**

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**

Headquarters Address: **2600 Camino Ramon**

City: **San Ramon** State: **CA** ZIP: **94583**

Contact Name: **Aida Armesto**

Contact Address: **600 NW 79 Ave**

City: **Miami** State: **FL** ZIP: **33126**

Phone: **305-341-8707** Fax: **305-264-2918**

E-mail: **aida.armesto@att.com**

Pooling Administrator:ⁱⁱ

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:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 615 LATA: 470 OCN^{iv}: 9419 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI^v):
SPFDTNMADS0

Rate Center^{vi}: SPRINGFLD

1.3 Dates:

Date of Application^{vii}:
03/16/2022

Requested Effective Date^{viii}:
04/16/2022

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

Expedited Explanation:

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

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____
615-698 1 & 2

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^{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.

Aida Armesto

Sr Specialist Database Admin

03/16/2022

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.

EXHIBIT 3

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2**Revised: October 31, 2019**

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **615-SPRINGFLD-TN-1653899**Date: **Wednesday,**
March 16, 2022OCN: **9419**Company Name: **BELLSOUTH TELECOMM INC DBA**
SOUTH CENTRAL BELL TELRate Center: **SPRINGFLD**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **615-212-0, 615-382, 615-384,**Name of Block Applicant: **Aida**
ArmestoSignature: **Aida Armesto**Title: **Sr Specialist Database Admin**
264-2918Phone: **305-341-8707-**Fax: **305-**E-Mail: **aida.armesto@att.com**A. Available Numbers³: **9225**B. Assigned Numbers: **5258**C. Total Numbering Resources⁴: **21000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: **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	
<u>3</u>	<u>-3</u>	<u>-12</u>	<u>-17</u>	<u>2</u>	<u>-3</u>							

E. Growth
History -
Previous 6
months⁶

F. Forecast -
Next 12
months⁷

-5 -5 -5 -5 -5 -5 -5 -5 -5 -5 -5 -5

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: -5.0

H. Months
to Exhaust⁹ Numbers Available for Assignment to
= Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	9225	-1845.00
2	10225	-2045.00

I.
Utilization¹⁰ Assigned Numbers (B) X 100 = 25.038
=

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

Explanation: _____

¹A 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.

²List 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.

³The 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).

⁴The 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)).

EXHIBIT 4

From: mharrell-simington@nanpa.com
To: [ARMESTO, AIDA D](#); [ARMESTO, AIDA D](#)
Cc: pa_part3@nanpa.com
Subject: , 615-SPRINGFLD-TN-1653899 DENIED PAS - Part 3A Confirmation
Date: Wednesday, March 16, 2022 1:56:41 PM

Pooling Administration System

Dated 16 March 2022

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : **615-SPRINGFLD-TN-1653899**

Date of Application: **03/16/2022** Effective Date: _____

Date of Receipt: **03/16/2022** Date of Response: **03/16/2022**

Service Provider Name: **BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL**

(LERGTM Routing Guide¹) OCN: **9419**

Parent Company OCN: **9400**

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: **SPFDTNMADS0**

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:

¹ 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.

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 (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.