

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE  
June 20, 2025**

*RE:*

**Docket No. 25-00047**

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

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

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Teleport Communications America, LLC (“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 ten consecutive thousands-blocks in the Maryville rate center served by switch identification KNVLTNMA54Z 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:

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<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 Red 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, United States Department of Defense Information Systems Agency (“DISA”) Headquarters, has requested 150,000 consecutive numbers in the Maryville rate center. A copy of the letter outlining the request is attached as Exhibit “A.”

8. On June 1, 2025 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 ten consecutive thousand-blocks in the Maryville rate center served by switch identification KNVLTNMA54Z to satisfy the customer request. A copy of this application and accompanying MTE Certification Worksheet is attached as Exhibit “B.”

9. NANPA denied TCAL’s request on June 1, 2025, stating “[y]ou do not meet the MTE and/or utilization requirements...,” even though TCAL does not have the numbering resources needed to satisfy its customer’s request. A copy of this denial is attached as Exhibit “C.” 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 150,000 consecutive numbers.

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. 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 150,000 consecutive numbers.

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>6</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.**

*Id.* (Emphasis supplied). The FCC also clarified in the FCC Order No. 00-249 Order that carriers

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<sup>6</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."

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 Commission 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,

BAKER, DONELSON, BEARMAN, CALDWELL  
& BERKOWITZ, PC

By /s/ Ryan A. Freeman

Ryan A. Freeman (BPR 033299)

633 Chestnut Street, Suite 1900

Chattanooga, TN 37450

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Counsel for Teleport Communications America, LLC

# EXHIBIT A



DEPARTMENT OF THE AIR FORCE  
AIR FORCE LIFE CYCLE MANAGEMENT CENTER  
HANSCOM AIR FORCE BASE MASSACHUSETTS

April 4th, 2025

SUBJECT: USAF Letter of Intent to AT&T to obtain Service at 134 BRISCOE DRIVE,  
LOUISVILLE, TN, 37777, US for 150,000 DIDs Referencing TSR# AA21FEB255671  
KNOXVILLE Rate Center for 150,000 Total mms

Robin Jenkins  
3033 Chain Bridge RD.  
Oakton, VA 22124

Dear Robin, United States Department of Defense Information Systems Agency (DISA), Headquarters, has modernized its communications capabilities at 134 BRISCOE DRIVE, LOUISVILLE, TN, 37777, US based upon US Department of Defense Unified Capabilities guidelines which include migration to VoIP access for commercial voice services. AT&T has been selected as the local services provider for VoIP Trunking services and an order has been placed for the equivalent of 4650 CCL(s) in concurrent call capacity along with a request for a block of 150,000 new contiguous telephone numbers.

The requested block of 150,000 contiguous public telephone numbers is required for compatibility with the existing Department of Defense dial plan and to support migration to the new platform without impacting operations. Furthermore, USAF directly supports the Department of Defense (DOD) and the public interest as its primary customers.

USAF is requesting that a block of 150,000 contiguous DID's be allocated to AT&T with KNOXVILLE Rate center to accommodate the growing requirements of USAF. The support of AT&T Business in issuing the requested 150,000 block is critical to achieving this goal. The requested DID's will be direct extension dial. In addition, there will be tremendous use of DIDs for such application as voice conferencing, audio/visual, call centers for external advisories, etc.

A non-contiguous DID range or a block of fewer numbers will seriously impact USAF operational capabilities at USAF and the services provided to civilian staff. If the Commission is not able to assign a new contiguous 150,000 DID block, we will not be able to align our dial plan to Department of Defense standards which will have a tremendously adverse impact on government defense operations, training, and support.

USAF is hoping to activate these numbers on or before 20 August 2025, based on the contractually required customer requested due date. Please note that the USAF would be very

willing to accept these numbers sooner if they were to become available sooner than the date mentioned. This is a New request; therefore, the customer will not be returning any numbers to AT&T.

Should there be any question or concerning the aforementioned, please do not hesitate to contact me promptly.

The technical point of contact for this action is Christopher Amoroso, GS-12, UC Softphones Program Manager, (380) 456-0001, christopher.amoroso.1@us.af.mil

The point of contact for this action is the undersigned, (380) 456-0001.

*Christopher Amoroso 4 APRIL 2023*

Name: Christopher Amoroso  
Title: UC Softphones Program Manager  
Rank: GS-12  
Agency/Department: USAF

# EXHIBIT B

Tracking Number: 865-MARYVILLE-TN-3106968

# Thousands-Block (NPA-NXX-X) and Central Office Code (NPA-NXX) Application - Part 1

Revised: October 28, 2024

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Type of Application: ☒ New ☐ Modification<sup>1</sup> ☐ Disconnect

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## 1.0 Applicant Contact Information

Service Provider OCN Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

Headquarters Address: 5001 Executive Pkwy 2W

City: San Ramon State: CA ZIP: 94583

Contact Name: Rowena Brown

Contact Address: 5001 Executive Pkwy 2W

City: San Ramon State: CA ZIP: 94583

Phone: 925-543-1526 E-Mail: rowena.r.brown@att.com

## 1.1 North American Numbering Plan Administrator<sup>2</sup>

Contact Phone: 866-623-2282

E-Mail: support@nanpa.com

## 1.2 General Information

NPA: 865 NXX<sup>3</sup>: X<sup>4</sup>:

LATA: 474 Service Provider OCN<sup>5</sup>: 114F

OCN Category<sup>6</sup>: CLEC Parent Company OCN: 7125

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Number of Thousands-Blocks Requested: 10

Switching Identification (Switching Entity/POI) CO Code<sup>7</sup>: KNVLTNMA54Z

Switching Identification (Switching Entity/POI) Thousands-Block<sup>8</sup>:

Rate Center<sup>9</sup>: MARYVILLE

Homing Tandem Operating Company<sup>10</sup>: BELLSOUTH TELCOMM

Tandem Homing CLLI<sup>TM11</sup>: KNVLTNMA84T

## 1.3 Dates

Date of Application: 06/01/2025

Requested Effective Date CO Code<sup>12,13</sup>: 07/30/2025

☐ By selecting this checkbox, I acknowledge that I am requesting an effective date 52 calendar days from the date the Administrator processes the request.

Request Expedited Treatment CO Code: ☐ Yes ☒ No

Expedite documentation must be provided when is "Request Expedite" = Yes and your company is not its own AOCN.<sup>14</sup>

Expedite Explanation:

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Requested Effective Date Thousands-Block<sup>15</sup>:

☐ By selecting this checkbox, I acknowledge that I am requesting an effective date 24 days from the date the Administrator processes the request.

Request Expedited Treatment Thousands-Block: ☐ Yes ☐ No

## 1.4 Thousands-Block/CO Code Information

CO Code Assignment Preference: 865-840,865-841,865-842,865-843,865-844,865-845,865-846,865-847,865-848,865-849,865-869,865-870,865-871,865-872,865-873

CO Codes that are Undesirable, if any: 666

### Code Applicant Responsibility

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

Thousands-Block(s) Assignment Preference:

Thousands-Block(s) that are Undesirable, if any:

☐ By selecting this checkbox, I acknowledge that I am willing to accept a Thousands-Block where the underlying CO Code may not yet be activated in the PSTN and loaded in the NPAC on the Thousands-Block effective date.<sup>16</sup>

## 1.5 Type of Request (Initial or Growth)

Initial Thousands-Block and/or CO code for the rate center: ☐ Yes

If yes, attach evidence of authorization and proof of capability to provide Service within 60 days.

Growth Thousands-Block and/or CO Code for the rate center: ☒ Yes

If yes, attach months to exhaust worksheet.

Pool Indicator<sup>17</sup>: ☒ Yes ☐ No

Update BIRRDS/LERG<sup>18</sup>: ☒ Yes ☐ No

## 1.6 Modification

|                                                           |                                                           |                                             |
|-----------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------|
| <input type="checkbox"/> OCN: Intra-Company <sup>19</sup> | <input type="checkbox"/> Switching Id                     | <input type="checkbox"/> Tandem Homing CLLI |
| <input type="checkbox"/> OCN: Inter-Company <sup>20</sup> | <input type="checkbox"/> Part 1B                          | <input type="checkbox"/> Effective Date     |
| <input type="checkbox"/> Rate Center                      | <input type="checkbox"/> Add New ISP Thousands-Block Port |                                             |

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## 1.7 Disconnect

Is this Thousands-Block Contaminated: ☐ Yes ☐ No

If yes, are there over 100 ported TNs: ☐ Yes ☐ No

If yes, are you exiting the market: ☐ Yes ☐ No

☐ I acknowledge I have completed all Intra SP ports in the NPAC and protected the Thousands-Block from further assignment.

Comments:

## 1.8 Certification Statement

I hereby certify that the information on this application 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>) as of the date of this application.<sup>21</sup>

Signature of Applicant: Rowena Brown

Date: 06/01/2025

## Instructions for filling out each Section of the Part 1 form:

Section 1.0: Contact information requires that Service Providers (SP) supply under "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 phone and e-mail address.

Section 1.2: The SP shall supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the iconectiv®, LLC LERG™ Routing Guide<sup>22</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). The Switch Identification (Switching Entity/POI) and for Central Office (CO) Code requests the **Tandem Homing CLLI™<sup>23</sup>** shall also be entered. Explanations of these terms may be found in the footnotes. In addition, when requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center the number of Thousands-Blocks requested shall be supplied.

Section 1.3: The date the Service Provider (SP) completes the application shall be entered in this section. For Central Office (CO) Code requests the Effective Date of the requested CO Code shall be entered. For Thousands-Block requests and CO Code requests for LRN or Pool Replenishment a Pooling Rate Center the Effective Date of the requested Thousands-Block shall be entered.

Section 1.4: For Central Office (CO) Code request, the Service Provider (SP) may indicate their preference for a particular CO Code, e.g., 321-6XX, or indicate any CO Code that may be undesirable, e.g., 321-6XX. When requesting Thousands-Blocks or CO Codes for LRN or Pool Replenishment in a Pooling Rate Center, SPs may indicate their preference for a particular Thousands-Block, e.g., NPA- 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., NPA-321-6XXX.

Section 1.5: Service Providers (SP) indicate the type of request. Initial requests are for first applications for a Thousands-Block and/or Central Office (CO) Code in a Rate Center, Growth applications are for additional Thousands-Blocks and/or CO Codes 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) indicate when the request is for a modification and the type of change. Rate Center and Tandem Homing CLLI changes only apply to Central Office (CO) Codes. Part 1B changes only apply to Thousands-Blocks.

Section 1.7: Service Providers (SP) indicate when the request is for a disconnect. When the request is to disconnect a Thousands-Block, SPs shall also 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 North American Numbering Plan Administrator (NANPA) shall seek a new Thousands-Block Holder.

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<sup>1</sup> Identify type and reason for change(s) in Section 1.6.

<sup>2</sup> The contact information for the North American Numbering Plan Administrator (NANPA) may be located at <https://www.nanpa.com>.

<sup>3</sup> The NXX field is required for any Thousands-Block or Central Office (CO) Code modification or disconnect.

<sup>4</sup> The X field is required for any Thousands-Block modification or disconnect.

<sup>5</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments and Thousands-Block (NPA-NXX-X) 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.

<sup>6</sup> Each OCN is categorized to identify the type of company associated with a Company Code / OCN. Such information for a particular OCN is available in the LERG<sup>TM</sup> Routing Guide (LERG 1 table).

<sup>7</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 eleven-character iconectiv<sup>®</sup> Common Language Location Identification (CLLI<sup>TM</sup>) Code of the applicant's Switching Entity/POI. (iconectiv<sup>®</sup> and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>TM</sup>, CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and TPM<sup>TM</sup> Data Source are trademarks and the Intellectual Property of iconectiv<sup>®</sup>, LLC.)

<sup>8</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 eleven-character iconectiv<sup>®</sup> Common Language Location

Identification (CLLI™) Code of the applicant's Switching Entity/POI. (iconectiv® and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.)

<sup>9</sup> Rate Center name shall be a tariffed Rate Center associated with toll billing and in the LERG™ Routing Guide.

<sup>10</sup> Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

<sup>11</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

<sup>12</sup> Central Office (CO) Code Applicants should request an effective date that is at least 59 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.

<sup>13</sup> Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

<sup>14</sup> When your company is its own AOCN please provide the following in the remarks field: I act as my own AOCN and agree to reduce the input timeframe to [enter days]. When your company is not its own AOCN please provide the AOCN's acknowledgement and agree to reduce the input timeframe to [enter days] and expedite letter from your homing tandem operating company when requesting a new CO Code.

<sup>15</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>16</sup> In NAS, Thousands-Blocks from CO Codes not activated in the PSTN are identified as Available Pending (AP) on reports.

<sup>17</sup> The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling or indicate "No" if the CO Code being requested shall be used for a non-pooled CO Code or a dedicated customer where the Thousands-Block will not be built in BIRRDS.

<sup>18</sup> The Applicant shall indicate "Yes" if the Dedicated Customer Central Office (CO) Code being requested, or the Thousands-Block being ISP Thousands-Block Ported, shall be identified as Thousands-Block Number Pooled in BIRRDS/LERG™ and have all 10 Thousands-Block records built. The Applicant shall indicate "No" if the CO Code being requested shall be used as a non-pooled CO Code for a Dedicated Customer or the Thousands-Blocks being ISP Thousands-Block Ported shall not be identified as Thousands-Block Number Pooled in BIRRDS/LERG™ and have all 10 Thousands-Blocks built.

<sup>19</sup> Select if you are the current Thousands-Block or Central Office (CO) Code Holder

<sup>20</sup> Select if you are not the current Thousands-Block or CO Code Holder

<sup>21</sup> The Thousands-Block/Central Office (CO) Code applicant certifies veracity of this form by signing their name, and providing their title and date.

<sup>22</sup> iconectiv®, LLC and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of iconectiv®, LLC.

<sup>23</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

Tracking Number: 865-MARYVILLE-TN-3106968

# Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 1

Revised: October 28, 2024

(worksheet to be used for Requests for Additional Thousands-Blocks and CO Codes for Growth)

Date: 06/01/2025

Service Provider OCN: 114F

Service Provider OCN Name: TELEPORT  
COMMUNICATIONS AMERICA, LLC - TN

Rate Center: MARYVILLE

List all CO Codes NPA(s)-NXXs and Thousands-Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 865-324-8, 865-421-2, 865-518-0

Name of Applicant: Rowena Brown

Phone: 925-543-1526-null

E-Mail: rowena.r.brown@att.com

A. Available Numbers<sup>3</sup>: 972

B. Assigned Numbers: 2010

C. Total Numbering Resources<sup>4</sup>: 3000

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 CO Code(s) or Thousands-Block(s):

E. Previous 6-month growth history<sup>6</sup>:

| Month 1  | Month 2  | Month 3    | Month 4  | Month 5   | Month 6  | Month 7 | Month 8 | Month 9 | Month 10 | Month 11 | Month 12 |
|----------|----------|------------|----------|-----------|----------|---------|---------|---------|----------|----------|----------|
| <u>0</u> | <u>0</u> | <u>160</u> | <u>0</u> | <u>48</u> | <u>0</u> |         |         |         |          |          |          |

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

| Month 1       | Month 2   | Month 3   | Month 4   | Month 5   | Month 6   | Month 7   | Month 8   | Month 9   | Month 10  | Month 11  | Month 12  |
|---------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <u>150000</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> | <u>20</u> |

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6)<sup>8</sup>: 25016.667

H. Months to Exhaust<sup>9</sup>:

$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{0.039}$$

| Code Requested | Available Numbers | Months to Exhaust |
|----------------|-------------------|-------------------|
| 1              | 972               | 0.039             |

## I. Utilization<sup>10</sup>:

$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} \times 100 = \underline{67.000}$$

### Explanation:

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<sup>1</sup> A copy of this worksheet is required to be submitted to the North American Numbering Plan Administrator (NANPA) 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 Service Provider 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 Report in NAS and shall automatically populate on this form in NAS. 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 Service Provider 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 NAS and shall automatically populate on this form in NAS. 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 Thousands-Blocks received = 2,000 and 1 CO 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 NAS.

<sup>9</sup> This field is automatically calculated and populated on this form in NAS. To be assigned an additional Thousands-Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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 NAS. To be assigned an additional Thousands-Block (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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 C

Tracking Number: 865-MARYVILLE-TN-3106968

## Administrator's Response/Confirmation - Part 3

Revised: October 28, 2024

Date of Application: 06/01/2025

Effective Date:

Date of Response: 06/01/2025

☐ Request Approved

☐ Request Suspended

☐ Request Withdrawn

☒ Request Denied

### Administrator Comments:

The Months to Exhaust (MTE) and/or Utilization requirements were not met. This Part 3 denial may be used to request a state waiver from the appropriate state commission.

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.

NPA, NPA-NXX, NPA-NXX-X: 865

Rate Center: MARYVILLE

State: TN

☐ Assigned

☐ Modified

☐ Disconnected

Thousands-Block Contaminated: ☐ Yes ☐ No

If yes, the number of TNs contaminated (1-1000):

☐ Reserved

Reservation Expiration Date:

Service Provider OCN Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TN

Service Provider OCN: 114F

OCN Category: CLEC

Parent Company OCN: 7125

NPAC SPID:

Switching Identification (Switching Entity/POI): KNVLTNMA54Z

Tandem Homing CLLI™: KNVLTNMA84T

Applicant Contact Name: Rowena Brown

Phone: 925-543-1526

Email: rowena.r.brown@att.com

Administrator Contact Name: Kevin Gatchell

Phone: 925-420-0344

Email: kgatchell@nanpa.com