Patrick W. Turner
General Attorney–South Carolina
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AT&T South Carolina
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November 24, 2009

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's Intervention in Numbering Resources Determinations - Sullivans Island Rate Center
Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Sullivans Island Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

Patrick Turner

Patrick W. Turner

PWT/nml
Attachment
756016

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA'S	)
PETITION REQUESTING THE COMMISSION'S	)
INTERVENTION IN NUMBERING RESOURCES	)
DETERMINATIONS	)
	)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE SULLIVANS ISLAND RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of AT&T South Carolina's application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), 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,"[1] and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.[2] 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

[1] *See, e.g., 47* C.F.R. §52.15.

[2] *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*").

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer Comprehensive Maintenance Services.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Mt. Pleasant exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").[3]

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.[4]

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.[5] The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this

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[3] *See* 47 C.F.R. § 52.13 (a), (b).

[4] *See* 47 C.F.R. §52.7(g). *See also* 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

[5] *See* Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

requirement in two subsequent orders.[6] Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.[7] The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.[8]

7. In order to meet the customer's express request for a specific number,[9] on or about October 16, 2009, AT&T South Carolina submitted a Pooling Administration System request for the assignment of the 843-732 NPA/NXX in the Sullivans Island exchange. It was necessary to request the full NPA/NXX because the number specifically requested by the customer is in the 843-732 NPA-NXX, and that NPA-NXX is not currently active. If the Commission grants this request, AT&T will retain the 843-732-5xxx block of numbers upon

---

[6] *See* Second Report and Order, 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, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

[7] *See Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

[8] *Third NRO Order* at ¶¶50-52.

[9] *See* Exhibit A to this Petition. As noted in Exhibit A, the customer has requested a specific number because its advertisement in the Charleston directory does not contain the 803 area code and, therefore, calls placed to the NXX-XXXX number listed in the directory from the Charleston area are not being connected to the customer.

activation and will return the remaining 9,000 numbers to the national pool of numbers.[10] As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Sullivans Island Rate Center had a MTE of 14.057 months and a utilization of 31.617%.[11]

10. Thereafter, also on October 16, 2008, AT&T South Carolina's request was denied because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the INC Guidelines.[12] AT&T South Carolina's numbering resource request was denied despite the fact that AT&T South Carolina does not have the numbering resources needed to satisfy this customer's demands in the Sullivans Island Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide the telecommunications services the customer has specifically requested. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from

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10 *See* Exhibit B to this Petition.
11 *See Id.*
12 *See Id.*

receiving telecommunications services of their choice from providers of their choice for want of numbering resources."[13]

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.[14]

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory."[15] In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."[16]

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with

---

[13] *Second NRO Order* at ¶ 61.

[14] *See Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009,§ 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

[15] *Third NRO Order* at ¶ 64.

[16] *Id.*

AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

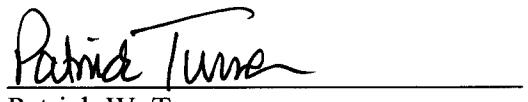
WHEREFORE, AT&T South Carolina requests that the Commission:

A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;

B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide the full 843-732 NPA/NXX in the Sullivans Island exchange to meet the needs of its customer Comprehensive Maintenance Services; and

C. Grant the requested relief as soon as possible.

Respectfully submitted this 24th day of November , 2009.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

754100

EXHIBIT A

at&t

ATT Advertising Solutions
100 Center Point Blvd Bldg 2
Columbia SC 29210

T: 803-731-4680
F: 803-731-4689
www.yellowpages.com

Friday November 20 2009

Michael J. Curcio
Comprehensive Maintenance Service, Inc.
530 vision Court
Irmo, SC 29063

Dear Mr. Curcio,

This will acknowledge your request that telephone number 843-732-5558 be assigned to Comprehensive Maintenance Service, Inc. As we understand it, you have requested this assignment because your company's full page advertisement and listings in the Charleston SC phone directory do not contain the 803 area code. Therefore, calls placed to the 843-732-5558 number listed in the directory are not being connected to your business.

AT&T South Carolina is making the regulatory filings necessary to comply with your request and we will keep you posted of the progress of those filings.

Sincerely,

Lisa W. Weaver

Lisa W. Weaver
General Manager S.C.
ATT Advertising & Publishing

USA Proud Sponsor of the U.S. Olympic Team

EXHIBIT B

Pooling Administration System

MARTA.ANTELO@ATT.COM (SP) • Sign Out

Time : 10/16/2009 03:49:26 PM EDT

Printable Version

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking Number: **843-SULLIVNSIS-SC-322863**

Full NXX: Pool Replenishment

Type of Application: ☐ **New** ☐ **Change** [1] ☐ **Delete**

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: **BELLSOUTH SO BELL**

Headquarters Address: **2600 CAMINO RAMON**

City, State, Zip: **SAN RAMON ,CA ,94583**

Contact Name: **MARTA ANTELO**

Contact Address: **600 NW 79TH AVENUE, ROOM 336**

City,State,Zip: **MIAMI, FL, 33126**

Phone: **305-260-8213** FAX: **305-264-2918** E-mail: **MARTA.ANTELO@ATT.COM**

Code Administrator: [2]

Name: **Michael Ortega**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5348** FAX:**571-434-5502**

1.2 NPA: **843** NXX: [3] LATA: **436** OCN: [4] **9417**
Parent Company's OCN(s) **9400**

Switching Identification(Switch Entity/POI) [5] **ISPLSCISRS1**

Locality/City/Wire Center: Rate Center: [6] **SULLIVNSIS**

Homing Tandem Operating Co: [7] **BST** Tandem Homing CLLI [8] :**CHTNSCDT60T**

1.3 Dates: Date of Application:**10/16/2009** Request Effective Date: [9] [10] **12/21/2009**

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

Request Expedited Treatment? Yes No **X**

1.4 a) Type of company/entity requesting the code: **Incumbent Local Exchange Carrier (ILEC)** (LEC, IC, CMRS, Other)

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

c) Code Assignment Preference (Optional) **CUSTOMER IS REQUESTING PHONE NUMBER 843-732-5558, AND THE NPA-NXX-5 IS NOT IN THE POOL LIST, THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT. 843-xxx-5**

d) Codes that are undesirable, if any **ALL OTHERS.**

e) Type of change(Mark **all** that apply)

☐ OCN-Intra-company [11] ☐ Switching Id ☐ Rate Center ☐ Tandem Homing CLLI

☐ OCN-Inter-company [12] ☐ Effective Date ☐ LATA ☐ Extend Reservation

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

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

Pooling Indicator: [13] ☐ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain):

1.8 Part 2 is attached Part 2 is not attached **X** for BIRRDS [14] [15]

Additional Documentation is attached Additional Documentation is not attached **X**

Comments:
CUSTOMER IS REQUESTING PHONE NUMBER 843-732-5558, AND THE NPA-NXX-5 IS NOT IN THE POOL LIST, THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (http://www.atis.org/atis/clc/inc/incdocs.htm) as of the date of this application: [16]

MARTA ANTELO

ASSOC TECH SUPPORT 10/16/2009 ANLYS NTWK

Signature of Code Applicant Title Date

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

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

[3] The NXX field is required for any code request in which there is a change or the NXX is being returned.

[4] Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) 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 Telcordia TM Routing Administration (TRA) on 732-699-6700.

[5] This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

[6] Rate Center name must be a tariffed Rate Center associated with toll billing.

[7] Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

[8] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

[9] Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

[10] Requests for code assignment should not be made more than six months prior to the requested effective date.

[11] Select if you are the current Code Holder

[12] Select if you are not the current Code Holder

[13] The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

[14] Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia TM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

[15] WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

[16] An incomplete form may result in delays in processing this request.

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Pooling Administration System

MARTA.ANTELO@ATT.COM (SP) • Sign Out

Time : 10/16/2009 03:50:33 PM EDT

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TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: **843-SULLIVNSIS-SC-322863**
Full NXX: Pool Replenishment

Type of Application: ☐ **New** ☐ **Change** ☐ **Disconnect**

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH SO BELL**

Headquarters Address: **2600 CAMINO RAMON**

City, State, Zip: **SAN RAMON, CA, 94583**

Contact Name: **MARTA ANTELO**

Contact Address: **600 NW 79TH AVENUE, ROOM 336**

City,State,Zip: **MIAMI , FL , 33126**

Phone: **305-260-8213** FAX: **305-264-2918** E-mail: **MARTA.ANTELO@ATT.COM**

Pooling Administrator: [ii]

Contact Name: **Dora Wirth**

Contact Address: **1800 Sutter St**

City,State,Zip: **Concord ,CA,94520**

Phone: **925-363-8706** FAX: **925-363-7684**

E-mail: **dora.wirth@neustar.com**

1.2 General Information:

Check one : No LRN needed X LRN needed [iii]

NPA: **843** LATA: **436** OCN: [iv] **9417** Parent Company's OCN **9400**

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

Switching Identification(Switch Entity/POI) : [v]
ISPLSCISRS1

City or Wire Center Name :

Rate Center: [vi]
SULLIVNSIS

Rate Center Sub Zone:

1.3 Dates:

Date of Application: [vii]
10/16/2009

Requested Block Effective Date: [viii]
12/21/2009

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

Request Expedited Treatment? (See Section 8.6) Yes No **X**

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)
CUSTOMER IS REQUESTING PHONE NUMBER 843-732-5558, AND THE NPA-NXX-5 IS NOT IN THE POOL LIST, THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT. 843-xxx-5

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
ALL OTHERS.

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) **N/A**

1.5 Type of Request:

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

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

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

Type of change(Mark **all** that apply)

☐ OCN:Intra-company [ix] ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company [x] ☐ Effective Date

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

1.6 Block Return :

a) Is this block Contaminated Yes No

b) If Yes how many TNs are NOT available for assignment :

c) Have all new Intra SP ports been completed in the NPAC Yes No

d) Has this block been protected from further assignment Yes No

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

Remarks: **CUSTOMER IS REQUESTING PHONE NUMBER 843-732-5558, AND THE NPA-NXX-5 IS NOT IN THE POOL LIST, THEREFORE, WE ARE REQUESTING A FULL NXX FOR REPLENISHMENT.**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

MARTA ANTELO	**ASSOC TECH SUPPORT ANLYS NTWK**	**10/16/2009**
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 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 section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider [xi]. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider 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 should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth 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 must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new 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.

Foot Notes :

[i] Identify the type of change(s) in Section 1.5.

[ii] The Pool Administrator is available to assist in completing these forms.

[iii] A CO Code application will also need to be submitted to the PA.

[iv] Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code 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).

[v] This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

[vi] Rate Center name must be a tariffed Rate Center.

[vii] Acknowledgment and indication of disposition of this application will 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 NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

[ix] Select if you are the current Block Holder.

[x] Select if you are not the current Block Holder

[xi] Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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Pooling Administration System

MARTA.ANTELO@ATT.COM (SP) • Sign Out

Time : 10/16/2009 03:51:30 PM EDT

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Appendix 3 May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level[1]

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **843-SULLIVNSIS-SC-322863**

Date: **10/16/2009** OCN:**9417** Company Name:**BELLSOUTH SO BELL**

Rate Center: **SULLIVNSIS**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant:**MARTA ANTELO** Signature: **MARTA ANTELO**

Title:**ASSOC TECH SUPPORT ANLYS NTWK** Telephone No.: **305-260-8213**
FAX No.: **305-264-2918**

E-mail: **MARTA.ANTELO@ATT.COM**

A. Available Numbers:**2399**

B. Assigned Numbers: **1148**

C. Total Numbering Resources:**3631**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation [2]:**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[3]	**8**	**5**	**4**	**4**	**2**	**0**						
F. Forecast - Next 12 months[4]	**4**	**4**	**4**	**1004**	**4**	**4**	**4**	**4**	**4**	**4**	**4**	**4**

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):**170.667**

H. Months to Exhaust[5] =

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	**2399**	**14.057**

I. Utilization[6] =

Assigned Numbers(B) - Excluded Numbers(D) X 100 = **31.617**

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

Explanation:

[1]A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

[2]Quantity of numbers activated in the past 90 days is based on blocks and/or codes 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).

[3]Net change in TNs 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.

[4]Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

[5]To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

[6]Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System

MARTA.ANTELO@ATT.COM (SP) • Sign Out

Time : 10/16/2009 03:52:21 PM EDT

Printable Version

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : **843-SULLIVNSIS-SC-322863**

Date of Application: **10/16/2009** Effective Date: _____

Date of Receipt: **10/16/2009** Date of Response: **10/16/2009**

Service Provider Name: **BELLSOUTH SO BELL**

(Telcordia TM LERG TM Routing Guide) OCN: **9417**

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dora Wirth Phone: **925-363-8706**

Signature of Pooling Administrator

Dora Wirth Fax: **925-363-7684**

Name (print)

Email: **dora.wirth@neustar.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 : _____

Switch Identification(Switch Entity/POI): [1] **ISPLSCISRS1**

Rate Center: **SULLIVNSIS**

Rate Center Sub Zone: _____

X **Form Complete, request denied.**

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using

this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

___ **Request withdrawn.**
Explanation:

___ **Assignment activity suspended by the administrator.**
Explanation:

Remarks:

[1] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls.This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia,LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies,Inc.)

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Time : 10/16/2009 03:45:36 PM EDT

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)[1]

Your Utilization calculates to **31.617%**. The FCC required the utilization of **75.000%**.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- (•) Return to the Months To Exhaust Form
- ( ) Need to request a State Waiver
- ( ) Received a State Waiver

Submit | Cancel

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STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Sullivans Island Rate Center to be served by the method indicated below upon the following this November 24, 2009:

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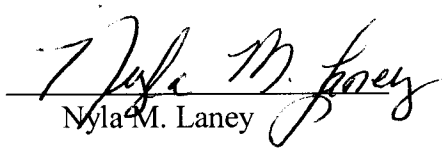

Nyla M. Laney

714992