Patrick W. Turner
General Attorney–South Carolina
Legal Department

AT&T South Carolina
1600 Williams Street
Suite 5200
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pt1285@att.com
www.att.com

March 16, 2015

The Honorable Jocelyn Boyd
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
Allendale Rate Center –University of South Carolina Salkehatchie
Docket No.

Dear Ms. Boyd:

BellSouth Telecommunications, LLC 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 Allendale Rate Center in the above-captioned matter. In summary:

AT&T South Carolina submitted an NXX Assignment Request via the Pooling Administration System on February 20, 2015;

AT&T South Carolina's customer requesting numbering resources is University of South Carolina Salkehatchie

AT&T South Carolina requested a thousands block in the Allendale exchange;

The request impacts the Allendale rate center;

At the time of the request, the Allendale Rate Center had a "months to exhaust" ("MTE") of 5728.363 months for the relevant block

At the time of the request, the Allendale Rate Center had a utilization of 32.686%.

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
1126733

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 ALLENDALE RATE CENTER

BellSouth Telecommunications, LLC 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 803 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.

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

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

1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Allendale 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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[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*").

[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.").

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. On or about February 20, 2015, AT&T South Carolina submitted a Pooling Administration System request for the assignment of one thousands-block in the Allendale exchange to go with its customer's existing dialing plan. In order to meet the customer's express request for numbers,[9] AT&T South Carolina requested the assignment of one thousands-block in

---

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

[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.

the Allendale exchange.[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 Allendale Rate Center had a MTE of 5728.363 months for the relevant block, and a utilization of 32.686%.[11]

10. Thereafter, also on February 20, 2015, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines.[12] AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Allendale 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 telecommunications services requested by its customer. 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 receiving

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10 *See* Exhibit B to this Petition.

11 *See Id.*

12 *See Id.*

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]

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[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.*

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 AT&T South Carolina's ability to provide telecommunication services to its customers.

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.

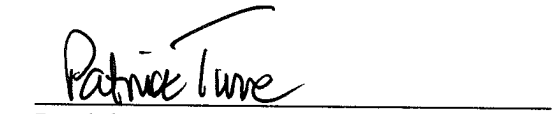
WHEREFORE, AT&T South Carolina requests that the Commission:

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 one thousands-block in the Allendale exchange; and

C. Grant the requested relief as soon as possible.

Respectfully submitted this 16th day of March, 2015.



Patrick W. Turner
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Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

1126734

Exhibit A

UNIVERSITY OF
SOUTH CAROLINA
SALKEHATCHIE

January 6, 2015

AT&T
AT&T Global Ordering
Thomas Davis, Jr.
Td1460@att.com

Re: RDS Tracking # 12151488857712TD
AT&T Club Account: 803-584-3446 278

Mr. Davis, Jr:

The USC – Salkehatchie campus is the process of preparing for a new phone switch in which we will change our voice infrastructure to a PRI that will include DIDs. AT&T has confirmed that they do not have 300 sequential numbers within the 803-584 exchange (Allendale, SC). Therefore, I am requesting AT&T to open a new prefix for Allendale, SC. I would like the new number to start with 803-XXX-7255 and end in 803-XXX-7555.

If you should need any additional information from me in order to start this process, please don't hesitate to call me at 803-584-3446 x 101.

Thank you,

Gayle S. Walsh
Director, Information Technology
USC Salkehatchie

P.O. Box 617 • Allendale, South Carolina 29810 • 803/584-3446 • Fax 803/584-5038
P.O. Box 1337 • Walterboro, South Carolina 29488 • 843/549-6314 • Fax 843/549-6007

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Exhibit B

Pooling Administration System

Sign Out

rw0052@att.com (SP)

Time : 02/20/2015 04:32:57 PM EST

Individual Block Requests
CO/NXX Code Requests
Withdraw Pending Requests
Intra SP Block Port Requests
PSTN Activation
Confirm Resources In Service
Submit Forecast
Search Forms
Reports
User Profile

Printable Version

TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking Number: **803-ALLENDALE-SC-809265**

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 SOUTHERN BELL TEL & TEL**

Headquarters Address: **500 Broad St SE**

City, State, Zip: **Gainesville, GA, 30501**

Contact Name: **Rena Butticaz**

Contact Address: **500 Broad St SE**

City, State, Zip: **Gainesville, GA, 30501**

Phone: **770-945-9630** Fax: **770-945-9630** E-mail: **rw0052@att.com**

Pooling Administrator: [ii]

Contact Name: **John Auerbach**

Contact Address: **1800 Sutter St. Ste. 780**

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

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

E-mail: **john.auerbach@neustar.biz**

1.2 General Information:

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

NPA: 803 LATA: 434 OCN: [iv] 9417 Parent Company's OCN 9400

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI) : [v]
ALDLSCMARS1

Rate Center: [vi] ALLENDALE

1.3 Dates:

Date of Application: [vii] 02/20/2015

Requested Block Effective Date: [viii] 03/23/2015

☐ 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) _____

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 _____ or 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 _____ or No _____

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

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

Remarks:

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.

Rena Butticaz	**Sr. Specialist**	**02/20/2015**
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 iconectiv™ 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 iconectiv Telecom 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.

Footnotes:

[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 PSTN 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] LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

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Last updated: February 23, 2015

Pooling Administration System

Sign Out

rw0052@att.com (SP) Time : 02/20/2015 04:33:21 PM EST

Individual Block Requests
CO/NXX Code Requests
Withdraw Pending Requests
Intra SP Block Port Requests
PSTN Activation
Confirm Resources In Service
Submit Forecast
Search Forms
Reports
User Profile

Printable Version

Appendix 3

January 12, 2015

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

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **803-ALLENDALE-SC-809265**

Date: **Friday, February 20, 2015** OCN:**9417** Company Name:**BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Rate Center: **ALLENDALE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)[2]:**803-584-A**

Name of Block Applicant:**Rena Butticaz** Signature: **Rena Butticaz**

Title:**Sr. Specialist** Telephone No.: **770-945-9630-** FAX No.: **770-945-9630**

E-Mail: **rw0052@att.com**

A. Available Numbers:**6685**

B. Assigned Numbers: **3246**

C. Total Numbering Resources:**9931**

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

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): **1.167**

H. Months to Exhaust[6] =

Numbers Available for Assignment to Customers(A) / Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	6685	5728.363

I. Utilization[7] =

Assigned Numbers(B) / Total Numbering Resources(C)-Excluded Numbers(D) X 100 = **32.686**

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]Report on all resources for the requested geographic area, including newly acquired blocks/codes.

[3]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).

[4]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.

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

[6]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)).

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

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Last updated: February 23, 2015

Pooling Administration System

rw0052@att.com (SP) Sign Out

Time : 02/20/2015 04:33:41 PM EST

Individual Block Requests
CO/NXX Code Requests
Withdraw Pending Requests
Intra SP Block Port Requests
PSTN Activation
Confirm Resources In Service
Submit Forecast
Search Forms
Reports
User Profile

Printable Version

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 803-ALLENDALE-SC-809265

Date of Application: 02/20/2015 Effective Date:

Date of Receipt: 02/20/2015 Date of Response: 02/20/2015

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

(iconectiv TM LERG TM Routing Guide) OCN: 9417

Parent Company OCN: 9400

NPAC SOA SPID :

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706

Signature of Pooling Administrator

John Auerbach Fax: 925-363-7684

Name (print)

Email: john.auerbach@neustar.biz

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] ALDLSCMARS1

Rate Center: ALLENDALE

X Form Complete, request denied.

Explanation:

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 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 (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies,Inc. dba iconectiv)

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Last updated: February 23, 2015

Pooling Administration System

• Sign Out

rw0052f@att.com (SP)

Time : 02/20/2015 04:22:11 PM EST

- Individual Block Requests
  - New Block Request
  - New Block Reservation
  - Assign/Cancel/Extend Reservation
  - Block Effective Date Change
  - Block Modification
  - Block Disconnect
  - Cancel Block Disconnect
  - Saved Block Requests
  - Modify Pending Request
  - Copy Block Request
  - Attach Documents
- CO/NXX Code Requests
  - New Code Request
  - Code Modification
  - Code Disconnect
  - Copy Code Request
  - Multiple Code Request
- Withdraw Pending Requests
- Intra SP Block Port Requests
- PSTN Activation

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

Your Utilization calculates to 32.686%. The FCC requires a utilization of 75%.
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
- Over-Contaminated Block Exception

Submit | Cancel

- Confirm Resources In Service
- Submit Forecast
  - Create/Modify Forecast
- Search Forms
- Reports
- User Profile

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Last updated: February 20, 2015February 20, 2015.

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 and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Allendale Rate Center to be served by the method indicated below upon the following this March 16, 2015.

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(Electronic Mail)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(Electronic Mail)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
8385 Yahley Mill Rd.
Richmond, VA 23231
(Electronic Mail)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Electronic Mail)

Ms. Amy Putnam
Director-Neustar National Pooling Administrator
1800 Sutter Street
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Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Florence P. Belser, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
(Electronic Mail)

Nyla M. Laney

714992