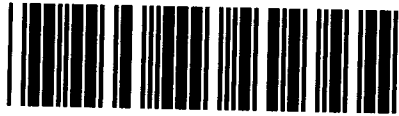


Control Number: 39150



Item Number: 1

Addendum StartPage: 0



701 Brazos St, Suite 600  
Austin, TX 78701

Fax 512 370-4275

February 15, 2011

Filing Clerk  
Public Utility Commission of Texas  
1701 N. Congress  
Austin, TX 78711

FILED  
FEB 15 PM 4:35  
FILING CLERK

Subject: PETITION OF VERIZON SOUTHWEST FOR WAIVER OF DENIAL OF  
NUMBERING RESOURCES

Verizon Southwest (Verizon) requests the Public Utility Commission of Texas to direct the Pooling Administrator (PA) to provide Verizon with an additional thousands block code to satisfy its business requirements.

The additional thousands block is needed to continue to provide service in Verizon's Plano exchange to the Plano ISD. Plano ISD needs a consecutive set of numbers to work with the numbers in their current system. Currently, we do not have enough consecutive numbers to serve this customer. In order for Verizon to be able to offer service to Plano ISD, Verizon requests a waiver from the Texas PUCT.

On or about February 7, 2011, Verizon submitted a Central Office Code (NXX) Assignment Request Form to the PA for the assignment of the number block necessary to meet Verizon's business needs. A copy of this application is provided as Attachment 1.

Verizon completed the application in accordance with the Central Office Code Assignment Guidelines and the necessary Months to Exhaust Certification, which is included as Attachment 2.

The PA denied the request on the grounds that Verizon had not met the rate center-based months-to-exhaust criteria in order to be assigned a thousands-block from a new NXX code for the purpose of providing service. This decision is included as Attachments 3.

Under earlier months-to-exhaust procedures, waivers or exceptions were granted where customer hardships were demonstrated or the service provider's inventory did not have a block of numbers large enough to meet a customer's specific request. In this case, Verizon does not have a complete block of consecutive numbers in order to serve its customer. Under existing procedures, the PA looks at the number of months to exhaust for the entire rate center without any exceptions. However, paragraph 64 of the FCC's Third Report and Order in the Numbering Resource Optimization docket states that a carrier "...should be able to get additional numbering resources

Filing Clerk  
February 15, 2011  
Page 2

when there is a verifiable need due to the carrier's inability to satisfy a specific customer request."<sup>1</sup> Also, paragraph 64 indicated that "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." The Texas Commission thus has the authority to review the PA's decisions and reverse them when appropriate.

Verizon seeks the Commission's review of the PA's decision to withhold numbering resources. The PA's decision violates the intent and requirement of the FCC and PUCT in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need.

Verizon requests that the Commission instruct the PA to release the numbering resources necessary to meet the needs of Plano ISD. If you have any questions regarding this request please call me at 512-370-4215.

Sincerely,

Lisa A. McLaughlin  
Analyst – Regulatory Affairs

Attachments (3)  
LAM:lam

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<sup>1</sup> In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Telephone Number Portability, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, CC Docket No. 99-200, CC Docket No. 95-116 (Released December 28, 2001).

**Thousands-Block Application Form  
Part1A****ATTACHMENT 1**

Type of Application (check one):

☐ New☒ Change<sup>i</sup>☐ Delete**GENERAL APPLICATION INFORMATION****1 Contact Information:****Block Applicant:**Company Name: GTE-SW DBA VERIZON SW INC.-TX

Headquarters Address:

E. PRATT ST. 3E City BALTIMORE State MD Zip 21202Contact Name: Theresa Rico

Contact Address:

100 Race Street, Floor 2 City Philadelphia State PA Zip 19107Phone: 215-440-4120 Fax:E-Mail: theresa.d.rico@core.verizon.com**Routing Administrator<sup>ii</sup>:**Contact Name: Julie Kline

Contact Address:

800 Sutter St. Suite 570 City Concord State CA Zip 94520Phone: 925-363-7653 Fax: 925-363-7686E-Mail: julie.kline@neustar.biz**2 General Information:**Check one: No LRN needed X LRN needed<sup>iii</sup> \_\_\_\_\_PA: 972 Lata: 552 OCN<sup>iv</sup>: 4344 Parent Company's OCNNumber of Thousand Blocks Requested: 1Switch Identification (Switching Entity/POI)<sup>v</sup>: PLANTXXBDS0 City or Wire Center Name: PLANORate Center<sup>vi</sup>: PLANO Rate Center Sub Zone:**3 Dates**Date of Application<sup>vii</sup>: 2/7/2011 Requested Block Effective Date<sup>viii</sup>: 2/28/2011Request Expedited Treatment? (See Section 8.6) Yes X No \_\_\_\_\_**4 Type of Service Provider Requesting the Thousands-Block:**Type of Service Provider: LEC (LEC, IXC, CMRS, Other)Primary type of service Blocks to be used for: Wireline

Thousands-Block(s) (NXX-X) assignment preference (optional)

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

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)

**Thousands-Block Application Form**  
**Part1A**

**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

Change block: Yes \_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:

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

*Theresa Rico*

Signature of Block Applicant

Code Administrator

Title

2/7/2011

Date

**Thousands-Block Application Form**  
**Part1A**

**ATTACHMENT 1**

**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™ ERG™ 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<sup>x</sup>. 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. They 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-XXXX.

**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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Thousands-Block Application Form  
Part1A**

**ATTACHMENT 1**

Notes:

Identify type of and reason for change(s) in Section 1.5.

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

A CO Code application will also need to be submitted to the PA

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 (800 524-120) 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).

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 LLITM code of the switch /POI.

Rate Center name must be a tariffed Rate Center.

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.

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).

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

Attachment 2

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level<sup>1</sup>  
(Thousand-Block Number Pooling Growth Block Request)

Date: 2/7/2011 OCN: 4344 Company Name: GTE-SW DBA VERIZON SW INC.-TX  
Rate Center: PLANO  
List all codes NPA(s)-NXXs and Block NPA(s)-NXX-X(s): See attached list  
Name of Block Applicant: Barbara Siderski Signature: Barbara Siderski

Title: \_\_\_\_\_  
E-Mail: barbara.e.siderski@core.verizon.com Telephone No: 215-440-4119 FAX No: 215-625-8548

- A. Available Numbers: 32876  
B. Assigned Numbers: 50931  
C. Total Numbering Resources: 87000  
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:  
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
1. Growth History - Previous 6 month <sup>2</sup>	6	611	253	108	-167	73					
2. Forecast - Next 12 months <sup>3</sup>	-557	147	173	128	114	151	145	195	130	95	79

3. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 26

4. Months to Exhaust<sup>4</sup> = 999.9  
Utilization<sup>5</sup> = 58.54  
Number Available for Assignment to Customers (A)  
Average Monthly Forecast (G)  
Assigned Numbers (B) - Excluded Numbers (D) \* 100 =  
Total Numbering Resources

Explanation:

A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For audit purposes, the applicant must retain a copy of this document. 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. Forecast of TNs needed in each following month, starting with the most recent month as Month #1. 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, § 52.15 (g) (3) (iii)). Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii)).



# Attachment 2

IPA(s)-NXX-Xs included in growth calculation:

972-964-5,8, 972-985-0,3, 972-596-1,2,5, 972-599-3, 972-758-7, 972-867-4, 972-964-0, 972-985-2, 972-519-7,8, 972-596-7, 972-599-1, 972-612-5,8,9, 972-758-3, 972-599-7, 972-867-0,8, 972-964-6, 972-985-8, 972-519-3, 972-596-9, 972-599-4, 972-612-7, 972-758-0, 972-612-0, 972-867-7, 972-964-2,3,9, 972-985-9, 972-519-1,2, 972-596-0,4, 972-758-5,9, 972-599-8, 972-769-7, 972-964-1,4, 972-985-1,4, 972-596-8, 972-599-5, 972-612-3, 972-758-2, 972-867-2, 972-964-7, 972-519-0,6, 972-596-3,6, 972-599-4, 972-769-1, 972-599-9, 972-867-5, 972-985-6, 972-519-5,9, 972-599-0,2, 972-758-1,8, 972-769-0, 972-867-6,9, 972-985-5,7, 972-519-4, 972-758-4,6, 972-769-2, 972-612-1,9, 972-867-1,3

**McLaughlin, Lisa A**Attachment 3**Subject:** FW: DENIAL: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 972-PLANO-TX-415619**Attachments:** TXW0002076\_P1A\_rev.pdf; TXW0002076\_MTB\_rev.pdf; Plano\_K-Blk analysis.xls**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 972-PLANO-TX-415619

## Pooling Administration System

Dated 09-February-2011

November 21, 2003

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3**Tracking Number :** 972-PLANO-TX-415619**Date of Application:** 02/09/2011 **Effective Date:** \_\_\_\_\_**Date of Receipt:** 02/09/2011 **Date of Response:** 02/09/2011**Service Provider Name:** VERIZON SW INC. TX(Telcordia <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN:4344**NPAC SOA SPID :** \_\_\_\_\_**Pooling Administrator Contact Information:****Kevin Gatchell** Phone: 925-363-8742

Signature of Pooling Administrator

**Kevin Gatchell** Fax: 925-363-7692

Name (print)

Email: kevin.gatchell@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

Attachment 3

contaminated :

Switch Identification(Switch Entity/POI): <sup>1</sup>

PLANTXXBDS0

Rate Center:

PLANO

Rate Center Sub Zone:

☒ **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:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)

**neustar**