



Control Number: 39262



Item Number: 1

Addendum StartPage: 0



701 Brazos St, Suite 600  
Austin, TX 78701

Fax 512 370-4275

March 17, 2011

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

39262  
MARCH 17 2011  
PUBLIC UTILITY COMMISSION

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 Nassau Bay exchange where Verizon is launching a new Voice Over Internet Protocol (VOIP) service, FiOS Digital Voice. This services uses new IP switches and gateways, not associated with the existing voice service. We will need new NXX's to provide routing to our new switches. Currently, we do not have enough consecutive numbers to provide this new service in Verizon's Nassau Bay exchange. In order for Verizon to be able to offer this service, Verizon requests a waiver from the Texas PUCT.

On or about March 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 FiOS Digital Voice 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 provide this service to its customers. 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

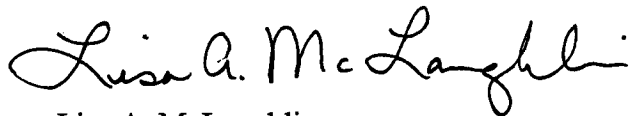
Filing Clerk  
March 17, 2011  
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resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request."<sup>1</sup> Also, paragraph 64 indicated that "States may not accommodate requests for specific numbers (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 provide FiOS Digital Voice. 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).

Central Office Code Assignment Guidelines(COCAG)  
Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1)  
December 9,2005

ATTACHMENT 1

Tracking Number: TXW0002081

Type of Application:  New  Change<sup>1</sup>  Delete

0 GENERAL INFORMATION

1 Contact Information:

Code Applicant:

Company/Entity Name: GTE-SW DBA VERIZON SW INC.-TX (CONTEL)

Headquarters Address: 1 E. PRATT ST. 3E

City,State,Zip: BALTIMORE,MD 21202

Contact Name: Barbara Ingram

Contact Address: 900 Clinton Avenue 1st Floor

City,State,Zip: Irvington ,NJ 07111

Phone: 973-399-5528

Fax: E-Mail: barbara.j.ingram@core.verizon.com

Code Administrator<sup>2</sup>:

Name: Beth Sprague

Address: 46000 Center Oak Plaza

City,State,Zip: Sterling ,VA 20166

Phone: 571-434-5513

Fax: 571-434-5502

2 NPA: 281 NXX<sup>3</sup>: \_\_\_ LATA: 560 OCN<sup>4</sup>: 2154 Parent Company's OCN(s): NONE

Switching Identification (Switching Entity/POI)<sup>5</sup>: NSBYTXXADS1

Locality/City/Wire Center: NASSAU BAY Rate Center<sup>6</sup>: KEMAH

Homing Tandem Operating Co.<sup>7</sup>: VERIZON SW INC. TX Tandem Homing CLLI<sup>TM8</sup>: HSTNTXJA05T

3 Dates: Date of Application: 3/7/2011 Requested Effective Date<sup>9 10</sup>: 4/21/2011

4 a).Type of company/entity requesting the code: LEC (LEC, IC, CMRS, Other)

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

c).Code Assignment Preference (Optional) any

d).Codes that are undesirable, if any na

e).Type of change (Mark all that apply):

OCN: Intra-company<sup>11</sup>  Switching Id  Rate Center  Tandem Homing CLLI

OCN: Inter-company<sup>12</sup>  Effective Date  LATA  Extend Reservation

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.

Pool Indicator<sup>13</sup>:  Yes  No

6 NPA Jeopardy Criteria Apply:  Yes  No

Central Office Code Assignment Guidelines(COCAG)  
Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1)  
December 9,2005

ATTACHMENT 1

7 Code request for new service (Explain): \_\_\_\_\_

- .8  Part 2 attached  Part 2 is not attached for BIRRDs<sup>14 15</sup>  
 Additional Documentation is attached  Additional Documentation is not attached

Comments: \_\_\_\_\_

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 the Central Office Code (NXX) Assignment Guidelines posted on the ATIS Web Site (<https://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application.<sup>16</sup>

*Barbara Ingram*  
Signature of Code Applicant

Code Administrator  
Title

3/7/2011  
Date

CO CODE ASSIGNMENT

MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level<sup>1</sup>  
 (Worksheet to be used for Requests for Additional Codes for Growth)

7/7/2011 Company Name: GTE-SW DBA VERIZON SW INC.-TX (CONTEL)

ATTORNEY: KEMAH

Xs included in growth calculation:<sup>2</sup> See Attached List

Authorized Representative of Code Applicant: Barbara Sienowski

Telephone No: 215-440-4119 FAX No: 215-625-8548

Telephone Numbers (TNs) Available for Assignment (See Glossary) <sup>3</sup>	13423											
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
Previous 6-month growth history <sup>4</sup>	-10	0	1	-44	-28	2	-104	-3	-6	-3	0	-27
Forecast - Next months 1-12 <sup>5</sup>	-167	4	10	-73	-7	13	-104	-3	-6	-3	0	-27

Range Monthly Forecast (Sum of months 1-6 Part C above divided by 6): -37

Months to Exhaust<sup>6</sup>

Telephone Numbers (TNs) Available for Assignment(A) = 999.9

Assignment Level<sup>7</sup>

Average Monthly Forecast (D) \* 100 = 45.14

Telephone Numbers (TNs) Assigned  
 Total Numbering Resources in Applicant's Inventory

1:

57

<sup>1</sup> Worksheet is required to be submitted to the Code Administrator, for audit purposes, it must be in the applicant's files.  
<sup>2</sup> resources for the requested geographic area, including newly acquired codes.  
<sup>3</sup> terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.  
<sup>4</sup> 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.  
<sup>5</sup> TNs needed in each following month, starting with the most recent month as Month #1.  
<sup>6</sup> an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).  
<sup>7</sup> ed numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

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

31-333, 281-335, 281-336

# Pooling Administration System

Dated 08-March-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

## Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 281-KEMAH-TX-422939

**Date of Application:** 03/08/2011 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 03/08/2011 **Date of Response:** 03/08/2011

**Service Provider Name:** GTE-SW DBA VERIZON SW INC.-TX (CONTEL)  
(Telcordia™ LERG™  
Routing Guide ) OCN: 2154

**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 contaminated : \_\_\_\_\_

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

NSBYTXXAPS0

Rate Center: \_\_\_\_\_

KEMAH

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.**

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**Request withdrawn.**

Explanation:

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**Assignment activity suspended by the administrator.**

Explanation:

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**Remarks:**

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<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™ 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.**