



Control Number: 41293



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AT&T

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Request for Waiver of Denial of Numbering Resources – Houston Rate Center – Texas Children’s Hospital

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March 14, 2013

Commission Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78701

Re: Request for Waiver of Denial of Numbering Resources – Houston Rate Center – Texas Children's Hospital

Dear Commission Filing Clerk:

Southwestern Bell Telephone Company d/b/a AT&T Texas (AT&T) requests the Public Utility Commission of Texas ("Commission") intervene and overturn the Pooling Administrator ("PA"), or NeuStar's, denial of AT&T's request for ten (10) thousand-block of numbers on behalf of its customer, Texas Children's Hospital System in the 713 NPA, in the Houston rate center.¹

Texas Children's Hospital (TCH) is requesting 10,000 consecutive DID number to be installed at their location at 6621 B Fannin in Houston, Texas. TCH is expanding phone capabilities for patient care phones throughout the hospital and wish to maintain their current 5-digit dialing pattern. TCH is in need of a block of DID numbers starting with 3. The customer is requesting **expedited treatment** of this application.

On February 27, 2013, AT&T submitted an application to the PA for the requested ten (10) thousand-block in the Houston rate center in accordance with the current guidelines (see attached application and worksheet). The PA denied the request because AT&T did not meet the months-to-exhaust, and utilization criteria established by the FCC.²

The FCC has adopted a safety valve mechanism to allow carriers that do not meet utilization criteria in a given rate center to obtain additional numbering resources. 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 when there is a verifiable need due to the carrier's inability to satisfy a specific customer request."³ Also, paragraph 64 indicates that "States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers." This mechanism should be available to AT&T in that its existing inventory does not contain ten (10) thousand-block of consecutive numbers to meet this customer's specific request.

The PA's decision violates the intent and requirement of the FCC and Commission in allowing carriers access to numbering resources to meet specific customer demands upon a sufficient showing of need, and the PA's denial of numbering resources interferes with AT&T's ability to serve the customer. AT&T

¹ CFR 47§52.15(g)(3)(iv)

² CFR 47§52.15(g)(3)(iii), CFR 47§52.15(h)

³ *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, Third Report and Order and Second Order on Reconsideration, FCC 01-362 (rel. December 28, 2001) (*NRO Order*).

understands that the numbering resources requested may only be activated to serve the requesting customer for whom the application is being made. If the customer request is withdrawn or declined, AT&T must return the numbering resources to the NANPA or Pooling Administrator, and may not retain the numbering resources to serve other customers.

AT&T has demonstrated that it cannot meet the customer's request through its existing inventory and respectfully requests that the Commission direct the PA to assign to AT&T ten (10) thousand-block of numbers on behalf of its customer, Texas Children's Rate Center in the Houston Rate Center.

Questions regarding this request may be referred to me at 512-457-2299.

Sincerely,

A handwritten signature in cursive script that reads "Karen Bevell".

Karen Bevell
Area Manager – Regulatory Relations

Attachments

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Type of Application (check one): New Change¹ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: AT&T CORPORATION
Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583
Contact Name: PATTY BERRIS
Contact Address: 2600 CAMINO RAMON, 2S750MM City SAN RAMON State CA Zip 94583
Phone: 925-901-1934 Fax: 925-355-9268
E-Mail: pb1986@att.com

Pooling Administratorⁱⁱ:

Contact
Name: Genevieve Bettiga
Contact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520
Phone: 925-363-8742 Fax: 925-363-7686
E-Mail: genevievebettiga@neustar.biz

1.2 General Information

Check one: No LRN needed LRN neededⁱⁱⁱ

NPA: 713 LATA: 560 OCN^{iv}: 9533 Parent Company's OCN 9533
Number of Thousands-Blocks Requested: 10

Switch Identification (Switching Entity/POI)^v: HSTNTXMCDS0 City or Wire Center Name _____
Rate Center^{vi}: HOUSTON Rate Center Sub Zone: _____

1.3 Dates

Date of Application^{vii}: 02/27/2013 Requested Block Effective Date^{viii}: _____
Request Expedited Treatment? (See Section 8.6) Yes No

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: WIRELINE
- c) Thousands-Block(s) (NXX-X) preference: 713-NX3
- 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) _____.

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

**Thousands-Block Application Form
Part 1A**

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

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

Disconnect 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____
-

Remarks: **SAFETY VALVE WAIVER REQUEST – TEXAS CHILDRENS HOSPITAL**

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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

PATTY BERRIS
Signature of Block Applicant

CODE ADMINISTRATOR
Title

02/27/2013
Date

Appendix 3 - Modified August 6, 2001

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET -- TN Level 1
(Thousands-Block Number Pooling Growth Block Request)**

Date: 02/27/2013 OCN: 9533 Company Name: SOUTHWESTERN BELL

Rate Center: HOUSTON

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (294) ; NPA/NXX-X (1437)

Name of Block Applicant: PATTY BERRIS Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-901-1934 FAX No.: 925-355-9268
E-Mail: pb1986@att.com

A. Available numbers: 1,687,169

B. Assigned numbers: 2,386,562

C. Total Numbering Resources: 4,376,913

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None
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 ²	<u>-3714</u>	<u>-4734</u>	<u>-6996</u>	<u>-3637</u>	<u>-3095</u>	<u>-6609</u>						
F. Forecast -- Next 12 months ³	<u>0</u>	<u>4687</u>	<u>12168</u>	<u>3054</u>	<u>2453</u>	<u>920</u>	<u>-3887</u>	<u>-1404</u>	<u>337</u>	<u>-1333</u>	<u>-1381</u>	<u>-1266</u>

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 3880.333

H. Months to Exhaust⁴ Numbers Available for Assignment to Customers (A) = 434,800
Average Monthly Forecast (G)

I. Utilization⁵ Assigned Numbers (B) * 100 = 54.526
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 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.
3 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4 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)).
5 Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

From: kevin.gatchell@neustar.biz
Sent: Wednesday, February 27, 2013 7:45 AM
To: MOSELEY, PATRICIA A; BERRIS, PATTY; CODE ADMIN SBC INTERNET SVCS; ARMESTO, AIDA D
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 713-HOUSTON-TX-615554

Pooling Administration System

Dated 27-February-2013

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 713-HOUSTON-TX-615554

Date of Application: 02/27/2013 **Effective Date:** _____

Date of Receipt: 02/27/2013 **Date of Response:** 02/27/2013

Service Provider Name: SOUTHWESTERN BELL

(Telcordia TM LERG TM Routing Guide) **OCN:** 9533

Parent Company OCN: 9533

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): ¹ _____

HSTNTXMCDS0

Rate Center: _____

HOUSTON

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™ 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.)



Texas Children's Hospital

To Whom It may concern,

3-7-13


Texas Children's Hospital requests 10,000 consecutive DID numbers to installed at 6621B Fannin. These numbers will meet TCH requirements for the next 3 years. TCH is expanding phone capabilities for patient care phones throughout the hospital.

Our goal is to maintain the current 5-digit dialing pattern. TCH is in need of a block of DID numbers starting with 3 (5 digit dialing)
Example: xxx-xx3-0000.

We request an installation date of March 1, 2013.

TCH prefers doing business with AT&T as our service provider. All other lines at this location are with AT&T.

Thank you,


William Cheong

Texas Children's Hospital
6621 Fannin Houston, Texas 77030
832-824-1000