



Control Number: 46097



Item Number: 1

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AT&T

June 23, 2016

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AT&T Texas
816 Congress
Suite 1100
Austin, Tx 78701

June 23, 2016

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

Re: Request for Waiver of Denial of Numbering Resources – Irving Rate Center – Baylor Scott & White Health

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 two (2) thousand-block of numbers on behalf of its customer, Baylor Scott & White Health in the 214/469/972 NPA, in the Irving rate center.¹

Baylor Scott & White Health has exceeded their existing blocks of DID's in their Irving campus location. They are requesting 2,000 consecutive DID numbers and would like to have the blocks beginning with 0 or 1. They would like to have these numbers by July 1, 2016. At this time, the number pooling inventory is not showing any block that could meet the customer's preference. NANPA will need to open a new code. The customer is requesting **expedited treatment** of this application.

On June 21, 2016, AT&T submitted an application to the PA for the requested two (2) thousand-block in the Irving 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 a two (2) thousand-block of consecutive numbers to meet this customer's specific request.

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*).



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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 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 two (2) thousand-block of numbers on behalf of its customer, Baylor Scott & White Health in the Irving Rate Center.

Questions regarding this request may be referred to me at 512-457-2260.

Sincerely,

A handwritten signature in black ink, appearing to read "Javier Rodriguez". The signature is fluid and cursive, with a large initial "J" and "R".

Javier Rodriguez
Area Manager – Regulatory Relations

Attachments

**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: PRISCILLA TAYLOR
Contact Address: 5001 EXECUTIVE PARKWAY, 3W200V City SAN RAMON State CA Zip 94583
Phone: 925-543-1524 Fax: 925-355-9268
E-Mail: pt3145@att.com

Pooling Administratorⁱⁱ:

Contact

Name: Kevin Gatchell

Contact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520
Phone: 925 363 7653 Fax: 925-363-7686
E-Mail: kevin.gatchell@neustar.biz

1.2 General Information`**Check one:** No LRN needed ☒ **LRN neededⁱⁱⁱ** _____

NPA: 972 LATA: 552 OCN^{iv}: 7726 Parent Company's OCN 9533
Number of Thousands-Blocks Requested: 2

Switch Identification (Switching Entity/POI)^v: DLLSTXNODS0 City or Wire Center Name _____
Rate Center^{vi}: IRVING Rate Center Sub Zone: _____

1.3 Dates

Date of 06/21/2016 Requested Block Effective Date^{vii}: _____
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 972-NXX-0XXX-1XXX
- d) Thousands-Block(s) (NXX-X) that is undesirable for this assignment, if 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) _____.

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 – BAYLOR HEALTHCARE SYSTEM**

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.

PRISCILLA TAYLORCODE ADMINISTRATOR06/21/2016

Signature of Block Applicant

Title

Date

Date 6/21/2016

_OCN: 7726 Company Name: SOUTHWESTERN BELL

Rate Center: IRVING

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (3) ; NPA/NXX-X (61)

Name of Block Applicant: PRISCILLA TAYLOR Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-543-1524 FAX No.: 925-355-9268

E-Mail: PT3145@att.com

A. Available numbers: 31539

B. Assigned numbers: 58353

C. Total Numbering Resources: 91000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0
List excluded Code(s) or Block(s):

6

E. Growth History – Previous 6 months²

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
<u>44</u>	<u>6</u>	<u>-123</u>	<u>-151</u>	<u>-149</u>	<u>-1347</u>						
<u>0</u>	<u>28</u>	<u>2110</u>	<u>125</u>	<u>42</u>	<u>43</u>	<u>54</u>	<u>-11</u>	<u>-6</u>	<u>-28</u>	<u>-141</u>	<u>-67</u>

F. Forecast – Next 12 months³

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 391.333

H. Months to Exhaust⁴ $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \frac{80.594}{80.594}$

I. Utilization⁵ $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = \frac{64.124\%}{64.124\%}$

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))

RODRIGUEZ, JAVIER

From: kevin.gatchell@neustar.biz
Sent: Tuesday, June 21, 2016 3:01 PM
To: TAYLOR, PRISCILLA; BROWN, ROWENA R; BLAKELY, SHANNON M; ARMESTO, AIDA D; POER, SHARON
Cc: PA_Part3@neustar.biz
Subject: 972-IRVING-TX-929257 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 21 June 2016

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 972-IRVING-TX-929257

Date of Application: 06/21/2016 Effective Date: _____

Date of Receipt: 06/21/2016 Date of Response: 06/21/2016

Service Provider Name: SOUTHWESTERN BELL TELEPHONE COMPANY - TX

(LERGTM Routing
Guide¹) OCN: 7726

Parent Company OCN: 7726

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 (1-1000): _____

Switch Identification (Switching/POI)²: DLLSTXNODS0
Rate Center: IRVING

X Form complete, request denied.

Explanation:

DR-57: 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 Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.



[Type text]
6/14/16

[Type text]

AT&T Account Manager Name Paula Rahning

AT&T Address 208 S Akard Street Dallas, TX 75201

Dear Paula,

This letter documents our requirements in relation to additional numbering resources. It is understood that AT&T may take this request to the state commission, if needed, to fulfill our request.

Example of customer explanation

Baylor Scott & White Health Irving campus has exceeded the existing blocks of DIDs supporting this hospital and we are needing to add more DID's to handle the growth of this hospital/campus. We need to add 2,000 more DID numbers ending with xxx-xxx-0xxxx and xxx-xxx-1xxx. We need this DID block to be consecutive numbers. AT&T is our chosen service provider and we understand that they might escalate this request to the state utility commission. The need by date of the new block of numbers by July 1, 2016. It's important that we know at least one week before our turn-up date whether or not this request will be granted.

A handwritten signature in black ink, appearing to read "Tommy Basham", with a stylized flourish at the end.

Tommy Basham

BSW Telecom Operations Team Lead