



Control Number: 48373



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AT&T
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PUBLIC UTILITY COMMISSION
FILING CLERK

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Docket No. **48373**

***Request for Waiver of Denial of Numbering
Resources – Midlothian Rate Center – Midlothian ISD***

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Javier Rodriguez
Area Manager – Regulatory Relations

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

T 512.457.2260
Jrodriguez4@att.com

May 15, 2018

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

Re: Request for Waiver of Denial of Numbering Resources – Midlothian Rate Center – Midlothian ISD

Dear Commission Filing Clerk:

Teleport Communications America, LLC (“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) thousands-block of numbers on behalf of its customer, Midlothian ISD in the 469 NPA, in the Midlothian rate center.¹

Midlothian ISD is requesting 1800 consecutive numbers to be utilized to provide 100 numbers to 11 existing schools and 3 administration buildings. They are also in the process of building a new elementary and a new middle school such that there will be 13 schools in the District. A communications plan has been developed such that they will implement and assign the numbers within 180 days of the numbers being made available. Midlothian is requesting 1800 consecutive numbers. AT&T owns 469-672-8 with approximately 210 numbers available.

On May 15, 2018, AT&T submitted an application to the PA for the requested two (2) thousands-block in the Midlothian 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 two (2) thousands-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) thousands-block of numbers on behalf of its customer, Midlothian ISD in the Midlothian 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", is placed above the typed name.

Javier Rodriguez
Area Manager – Regulatory Relations

Attachments

Tracking Number: **469-MIDLOTHIAN-TX-1094274**

Thousands-Block Application Form - Part 1A
Revised: January 4, 2016

Individual Block Request

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS GROUP - DALLAS**

Headquarters Address: **One AT&T Way**

City: **Bedminster** State: **NJ** ZIP: **07920**

Contact Name: **Luke Riga**

Contact Address: **One AT&T Way**

City: **Bedminster** State: **NJ** ZIP: **07920**

Phone: **908-234-6795** Fax: **908-234-8044**

E-mail: **lriga@att.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Kevin Gatchell**

Contact Address: **1800 Sutter St**

City: **Concord** State: **CA** ZIP: **94520**

Phone: **925-363-8742** Fax: **925-363-7692**

H

E-mail: kevin.gatchell@neustar.biz

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 469 LATA: 552 OCN^{iv}: 7148 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI^v): FTWOTXEDX1Z

Rate Center^{vi}: MIDLOTHIAN

1.3 Dates:

Date of Application^{vii}: 05/15/2018

Requested Effective Date^{viii}: 06/15/2018

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (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) _____

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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 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 _____ 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 _____ No _____
- d) Has this block been protected from further assignment: Yes _____ 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **469-MIDLOTHIAN-TX-1094274**

Date: **Tuesday, May 15, 2018**

OCN: **7148**

Company Name: **TELEPORT COMMUNICATIONS GROUP - DALLAS**

Rate Center: **MIDLOTHIAN**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **NPA NXX BLOCK ID 469 672 8**

Name of Block Applicant: **Luke Riga**

Signature: **Luke Riga**

Title: **Manager**

Phone: **908-234-6795-**

Fax: **908-234-8044**

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

A. Available Numbers: **161**

B. Assigned Numbers: **637**

C. Total Numbering Resources: **1000**

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	<u>0</u>	<u>35</u>	<u>41</u>	<u>2</u>	<u>1</u>	<u>4</u>						
F. Forecast - Next 12 months ⁵	<u>1814</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>	<u>14</u>

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):314.0



H. Months to Exhaust⁶ =
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	161	0.513
2	1161	3.697

I. Utilization⁷ =
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{63.7}$$

Explanation: _____

¹A 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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

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

⁶To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : **469-MIDLOTHIAN-
TX-1094274**

Date of Application: **05/15/2018** Effective Date: _____
Date of Receipt: **05/15/2018** Date of Response: **05/15/2018**

Service Provider Name: **TELEPORT COMMUNICATIONS GROUP - DALLAS**
(LERG™ Routing Guide¹) OCN: **7148**
Parent Company OCN: **7125**

NPAC SOA SPID :

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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:

FTWOTXEDX1Z

Rate Center:

MIDLOTHIAN

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.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language[®] Location Code (CLLI[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia



5/04/2018

Midlothian ISD
100 Walter Stephenson Road
Midlothian, TX 76065

AT&T TNAC:

This Letter of Intent represents a request by Midlothian ISD for 1800 consecutive telephone numbers for AT&T B-VoIP Service. Midlothian ISD intends to order service, in the Midlothian rate center. Pending AT&T's successful completion of the required testing, Midlothian ISD will activate the numbers within 180 days of the effective date of the code/block.

Midlothian ISD would like to provide a sequential block of 100 TN's to each of our 11 current schools and 3 administration/auxillary buildings. Midlothian is also in the process of building one new elementary campus and one new middle school campus bringing the total to 13 schools. Due to anticipated growth in the next 1-3 years, we also need to add an additional elementary campus before 2020.

Regards,

Leslie Garakani
Chief Technology Officer MISD

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