

Control Number: 50473



Item Number: 1

Addendum StartPage: 0

# Teleport Communications America, LLC

January 22, 2020

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*Docket No. \_\_\_\_\_*

***Request for Waiver of Denial of Numbering  
Resources – Houston Rate Center – Park Plaza Hospital***

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January 22, 2020

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 – Park Plaza Hospital

Dear Commission Filing Clerk:

Teleport Communications America, LLC (TCAL) requests the Public Utility Commission of Texas (“Commission”) intervene and overturn the Pooling Administrator (“PA”), or Somo’s, denial of TCAL’s request for five (5) thousands-block on behalf of its customer, Park Plaza Hospital, in the 346 NPA, in the Houston rate center.<sup>1</sup>

HCA is requesting 5000 consecutive numbers for expansion of their IP-Flex service, to include an iMobile service, at their Houston location. There are no requirements or restrictions for the numbers. A communications plan has been subsequently developed such that they will implement and assign the numbers within 180 days of the numbers being made available. TCAL owns many codes and blocks, in the Houston rate center but there is no block with 5000 consecutive numbers.

On January 17, 2020, TCAL submitted an application to the PA for the requested five (5) thousands-block in the Houston rate center in accordance with the current guidelines (see attached application and worksheet). The PA denied the request because TCAL did not meet the months-to-exhaust, and utilization criteria established by the FCC.<sup>2</sup>

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.”<sup>3</sup> 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 TCAL in that its existing inventory does not contain five (5) thousands-block of consecutive numbers to meet this customer’s specific request.

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<sup>1</sup> CFR 47§52.15(g)(3)(iv)

<sup>2</sup> CFR 47§52.15(g)(3)(iii), CFR 47§52.15(h)

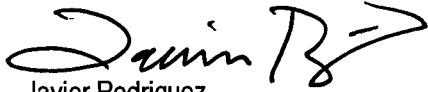
<sup>3</sup> *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, Third Report and Order and Second Order on Reconsideration, FCC 01-362 (rel. December 28, 2001) (*NRO Order*).

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 TCAL's ability to serve the customer. TCAL 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, TCAL must return the numbering resources to the NANPA or Pooling Administrator, and may not retain the numbering resources to serve other customers.

TCAL 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 TCAL five (5) thousands-block of numbers on behalf of its customer, Park Plaza Hospital in the Houston Rate Center.

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

Sincerely,



Javier Rodriguez  
Area Manager – Regulatory Relations

Attachments

Tracking Number: **346-HOUSTON-TX-1208508**Thousands-Block (NPA-NXX-X) Application - Part 1A  
Revised: October 31, 2019**Individual Block  
Request**Type of Application:    New                    Change <sup>i</sup>                    Disconnect

## General Application Information

## 1.1 Contact Information:

## Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - TX**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:<sup>ii</sup>Contact Name: **Kevin Gatchell**Contact Address: **1800 Sutter St**City: **Concord**    State: **CA**    ZIP: **94520**Phone: **925-420-0344**    Fax: **925-420-0377**E-mail: **kgatchell@somos.com**

## 1.2 General Information:

Check one : No LRN needed  LRN needed<sup>iii</sup>:

NPA: 346 LATA: 560 OCN<sup>iv</sup>: 7138 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 5

Switch Identification (Switching Entity/POI<sup>v</sup>):  
HSTNTX01MMD

Rate Center<sup>vi</sup>: HOUSTON

1.3 Dates:

Date of Application<sup>vii</sup>:  
01/17/2020

Requested Effective Date<sup>viii</sup>:  
02/17/2020

Requested Expedited Treatment? (See Section 8.6) Yes  No

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) \_\_\_\_\_

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<sup>ix</sup>: Switching Id Part 1B

OCN: Inter-company<sup>x</sup> 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 a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>Luke Riga</u>	<u>Manager</u>	<u>01/17/2020</u>
Signature of Block Applicant	Title	Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) 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 (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP 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 Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide<sup>xi</sup>. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv

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Thousands-Block Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 2  
 Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 346-HOUSTON-TX-1208508

Date: Friday, January 17, 2020 OCN: 7138 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TX

Rate Center: HOUSTON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 281-254-7, 281-254-8, 281-846-7, 346-227-5, 346-227-6, 346-227-7, 346-237-2, 346-237-3, 346-272-2, 346-272-6, 346-272-7, 346-294-2, 346-294-3, 346-294-4, 346-294-5, 346-294-6, 346-294-7, 346-294-8, 346-310-6, 346-348-7, 346-348-9, 346-397-7, 346-398-1, 346-398-2, 346-398-3, 346-403-2, 346-403-3, 346-403-4, 346-403-5, 346-403-6, 346-403-7, 346-403-8, 346-403-9, 346-718-6, 346-772-0, 346-772-4, 346-802-6, 346-867-4, 713-265-6, 713-325-5, 713-325-6, 713-325-7, 713-325-8, 713-325-9, 713-814-6, 713-815-6, 713-815-7, 713-848-0, 713-848-1, 713-848-2, 713-848-3, 713-848-4, 713-848-5, 713-848-6, 713-848-7, 713-848-8, 713-848-9, 713-904-6, 713-904-8, 713-904-9, 713-969-6, 713-997-1, 713-997-2, 713-997-3, 713-997-4, 713-997-5, 713-997-6, 713-997-7, 832-214-0, 832-214-1, 832-214-2, 832-214-3, 832-214-4, 832-214-5, 832-214-6, 832-214-9, 832-254-0, 832-254-1, 832-254-2, 832-254-3, 832-254-4, 832-254-5, 832-254-6, 832-254-7, 832-254-8, 832-254-9, 832-319-5, 832-325-0, 832-325-1, 832-325-2, 832-325-3, 832-325-4, 832-325-5, 832-325-6, 832-325-7, 832-325-9, 832-357-0, 832-357-1, 832-357-2, 832-357-3, 832-357-4, 832-357-5, 832-357-6, 832-357-7, 832-357-8, 832-357-9, 832-389-5, 832-519-2, 832-591-5, 832-649-6, 832-652-2, 832-667-0, 832-667-1, 832-667-2, 832-667-3, 832-667-4, 832-667-5, 832-667-6, 832-667-7, 832-667-9, 832-742-2, 832-742-3, 832-839-4, 832-839-5, 832-839-6, 832-839-7, 832-839-8, 832-839-9, 832-849-4, 832-973-4, 832-973-5, 832-973-6, 832-973-7, 832-973-8, 832-993-3, 713-353, 713-431, 713-821, 713-830, 713-860, 713-986,

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<sup>3</sup>: 25844



B. Assigned Numbers: 167490

C. Total Numbering Resources<sup>4</sup>: 195000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>5</sup>: 3000

List

Excluded Code(s) or Block(s): NPA NXX BLOCK ID 346 398 1 346 398 2 346 398 3

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth History - Previous 6 months<sup>6</sup>

	<u>-100</u>	<u>2097</u>	<u>161</u>	<u>1622</u>	<u>-408</u>	<u>389</u>						
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F. Forecast - Next 12 months<sup>7</sup>

	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>	<u>712</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: 712.0

H. Months to Exhaust<sup>9</sup> = Numbers Available for Assignment to Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	25844	36.298
2	26844	37.702
3	27844	39.107
4	28844	40.511
5	29844	41.916

I. Utilization<sup>10</sup> = Assigned Numbers (B) X 100 = 87.234

**Total Numbering Resources (C)-Excluded  
Numbers (D)**

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

<sup>2</sup>List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

<sup>3</sup>The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>4</sup>The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

<sup>5</sup>Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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).

<sup>6</sup>Net change in Telephone Numbers (TN) 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>7</sup>Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

<sup>9</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 346-HOUSTON-TX-1208508

Date of Application: 01/17/2020 Effective Date:
Date of Receipt: 01/17/2020 Date of Response: 01/17/2020

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - TX

(LERG TM Routing Guide 1) OCN: 7138
Parent Company OCN: 7125

NPAC SOA SPID :

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-420-0344
Signature of Pooling Administrator
Kevin Gatchell Fax: 925-420-0377
Name (print)
Email: kgatchell@somos.com

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: HSTNTX01MMD
Rate Center: HOUSTON

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 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.**

\_\_\_\_ Request Withdrawn.

Explanation:

\_\_\_\_ Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>™</sup>, CLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and TPM<sup>™</sup> Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.



January 15, 2020

HCA Healthcare, Inc. DBA  
Park Plaza Hospital  
1313 Hermann Dr.  
Houston, TX 77004

AT&T TNAC,

This Letter of Intent represents a request by Park Plaza Hospital for a contiguous block of 5000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP service. Park Plaza Hospital intends to order service in the Houston rate center, on the NWORLAMAGT5(P) switch, pending AT&T's successful completion of the required testing. Park Plaza Hospital intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

HCA Healthcare, Inc. dba Park Plaza Hospital currently has no requirements or restrictions on the numbers assigned.

Founded in 1968, HCA Healthcare is ranked 63 in Fortune 500 and has been named one of the "World's Most Ethical Companies" for ten years in a row. As one of the nation's leading providers of healthcare, HCA Healthcare is comprised of 185 hospitals and approximately 1,800 sites of care including surgery centers, freestanding ERs, urgent care centers and physician clinics in 21 states and the United Kingdom. Currently, HCA Healthcare employs approximately 270,000 colleagues, 38,000 physicians and 94,000 registered nurses. Each year approximately five percent of all U.S. hospital services happen at an HCA Healthcare facility.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Bailey".

Senior Telecom Analyst  
615-344-8849  
[cynthia.bailey@hcahealthcare.com](mailto:cynthia.bailey@hcahealthcare.com)