

July 30, 2008

VIA ELECTRONIC MAIL AND HAND DELIVERY

Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Cox Rhode Island, LLC Waiver Request For Number Block Release

Dear Luly:

On behalf of Cox Rhode Island Telcom, L.L.C., (“Cox”), this letter seeks a waiver of a denial by the Number Pooling Administrator (“NPA”) to release certain blocks of numbers for use by Cox’s customer, GTECH, a commercial customer of Cox (“Customer”).

Cox takes such action pursuant to Federal Communications Commission (“FCC”) rules, set forth at 47 C.F.R. 52.15(g)(3)(iv), and in accordance with the Rhode Island Public Utilities Commission (“Commission”) Orders governing similar requests by Cox. As the Commission has previously ruled, when the NPA denies the release of a necessary block of numbers, a carrier may appeal to the Commission for relief.¹ The Commission then reviews a company’s waiver request “on a case by case basis for reasonableness and to keep some control of the release of blocks.”² Because the Customer is anxious to receive these numbers, we respectfully request that the Commission address this waiver request as soon as practicable.

FACTUAL BACKGROUND

1. Cox has an existing contract with the Customer, GTECH, a commercial customer with corporate offices in Providence, R.I., to provide phone service.

¹ See In Re: Cox Rhode Island Telcom, L.L.C. Waiver Request for Number Block Release – Carey, Richmond & Viking Insurance, Docket No. 3702 (Nov. 8, 2005) and Docket No. 3607 (June 14, 2004) (“CRV Decision”) (Attached as Tab 1).

² CRV Decision in Docket 3607 at 2.

Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
July 30, 2008
Page 2

175 Federal Street
Boston, MA 02110-2210
Telephone 617-482-0600
Fax 617-482-0604

www.apslaw.com

2. Customer has specifically requested 100 telephone numbers from Cox for their business location in Coventry, Rhode Island.³ Cox's existing inventory of numbers for this rate center all have an NPA-NXX that has the last four numbers beginning with either a 3 or a 9. However, the GTECH PBX system is not compatible with numbers that have a last four digit beginning with either a 3 or a 9 because dialing 3 will automatically dial another GTECH location within the U.S., and dialing a number that begins with 9 will automatically send the call outside the GTECH system. To avoid these problems, GTECH has requested that the NXX numbers sought from Cox begin in either the 2000, 5000 or 7000 NPA NXX block.

3. Because Cox did not have sufficient numbers available from its existing inventory to meet the customer request Cox applied to the Pooling Administrator on July 10, 2008 for a new block of numbers, with an NPA NXX block beginning with a number that would meet the customer's PBX needs (again, Cox's existing inventory contains only numbers in the NPA NXX 3 or 9 block that are incompatible with the customer's PBX System).⁴

4. The Pooling Administrator rejected Cox's request for certain blocks of numbers because Cox's number utilization for this rate center is 71%, which is below the FCC required level of 75%, and its months to exhaust numbers out of this rate center (of 11 months)⁵ was also deemed to be above the six month requirement set by the Numbering Administrator.⁵

5. In order to minimize the unused numbers in the remaining block, Cox will return the remaining numbers from a new block to the Pooling Administrator, as contamination of the block would be less than 10% to meet this specific customer request.

STANDARD OF REVIEW

In setting its policy for the assignment of telephone numbers, the FCC designated NANPA and the Pooling Administrator to handle numbering resource administration.⁶ If the NANPA or Pooling Administrator decides to withhold numbering resources from a carrier, the FCC has specifically authorized state commissions to overturn those decisions for reasonable cause documented herein. That authority is specifically set out in the relevant FCC Rule, 47 C.F.R. § 52.15(g)(4), which states:

³ Copy of GTECH letter requesting specific numbers, dated July 10, 2008, is attached at Tab 2.

⁴ Copy of Cox's application to the Pooling Administrator is attached at Tab 3.

⁵ Copy of the NPA rejection attached at Tab 4.

⁶ 47 C.F.R. § 52.15(a) states: "Central Office Code Administration shall be performed by the NANPA, or another entity or entities, as designated by the Commission." 47 C.F.R. § 52.20(d) states: "The Pooling Administrator shall be a non-governmental entity that is impartial and not aligned with any particular telecommunications industry segment, and shall comply with the same neutrality requirements that the NANPA is subject to under this part."



Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
July 30, 2008
Page 3

175 Federal Street
Boston, MA 02110-2210
Telephone 617-482-0600
Fax 617-482-0604

www.apslaw.com

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an Operating Company Number (OCN). The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. **The state commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has complied with the reporting and numbering resource application requirements herein. The state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.** (emphasis added)

The FCC also clarified in the text of its Numbering Resources Order⁷ that carriers may now appeal to states using a "safety valve" mechanism (paragraphs 57-66). As is noted in the following, the FCC contemplated the need for states to respond when denials failed to consider a "specific customer request":

...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. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory. Carriers may demonstrate such a need by providing the state with documentation of the customer request and current proof of utilization in the rate center. States may not accommodate requests for specific numbers (i.e., vanity numbers), but may grant requests for customers seeking contiguous blocks of numbers. Any numbering resources granted for this reason may be initially activated only to serve the

⁷ *In the Matter of Numbering Resource Optimization, et al.*, CC Docket Nos. 99-200 and 96-98, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200 ("Third NRO").

Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
July 30, 2008
Page 4

175 Federal Street
Boston, MA 02110-2210
Telephone 617-482-0600
Fax 617-482-0604

www.apslaw.com

requesting customer for whom the application was made. If the customer request is withdrawn or declined, the requesting carrier must return the numbering resources to the NANPA or Pooling Administrator, and may not retain the numbering resources to serve other customers without first meeting our growth numbering resource requirements.⁸

Lastly, FCC numbering policy is not intended to deny carriers the use of numbers for legitimate purposes such as the request by Cox in this petition. In issuing its Numbering Resource Optimization Order, released December 29, 2000 (and effective May 8, 2001)⁹ the FCC communicated the heart of its pro-competition policy when it stated:

“[w]e continue to develop, adopt and implement a number of strategies to ensure that the numbering resources of the North American Numbering Plan (NANP) are used efficiently, and that all carriers have the numbering resources they need to compete in the rapidly expanding telecommunications marketplace.”¹⁰

Applying this FCC guidance, the Rhode Island Commission has determined that a carrier may be granted a waiver from the Pooling Administrator’s decision when a Carrier has a utilization rate over 50% and a customer is requesting less than 10% of the block, with the remaining 90 % to be returned to the Pooling Administrator.¹¹ For example, in its CRV Decision, the Commission granted Cox a waiver from the NPA’s denial based on the fact that Cox’s utilization rate was at 51% and the unused 90 % of the block numbers were returned to the NPA for assignment to another carrier¹².

In this petition, Cox is now at utilization rate of 71% and the Customer is only requesting 100 specific telephone numbers, which represents less than 10 % of the block that is being requested. If this waiver request is granted, Cox intends to return the unused numbers to the Pooling Administrator to preserve the numbering resource.

⁸ *Id.* at ¶ 64.

⁹ *In the Matter of Numbering Resource Optimization, et al.*, CC Docket Nos. 99-200 and 96-98, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 89-200 (rel. Dec. 29, 2000) (“*FCC 00-429 Second NRO*”)(available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-00-429A1.doc)

¹⁰ *Id.* at ¶ 1.

¹¹ CRV Decision in Docket 3607 at 2.

¹² CRV Decision in Docket 3607 at 2, 3.

Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
July 30, 2008
Page 5

175 Federal Street
Boston, MA 02110-2210
Telephone 617-482-0600
Fax 617-482-0604

www.apslaw.com

Returning these numbers of a block will meet the objectives outlined by the Commission in the CRV Decision to preserve Rhode Island available telephone numbers, thus preserving the 401 area code.¹³ It will maximize number conservation and further preserve the area code, while allowing Customer a choice in competitive carriers.

It is clear that all necessary elements are present to allow the Commission adequate evidence for the overturning of NPA's denial. First, Cox has demonstrated that it has received a customer request for numbering resources that it cannot meet with its current inventory. Second, Cox has demonstrated need by documenting in writing that it has a customer request and has demonstrated proof of utilization. Third, Cox made the appropriate application to NPA. Fourth, NPA denied Cox's request for a one-thousand block in the Coventry rate center because Cox's utilization of its numbers in this rate center did not hit the requisite percent and months to exhaust thresholds.

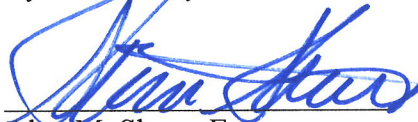
Because Cox meets the standards set forth in the Commission's past decisions, Cox respectfully requests this waiver from the Pooling Administrator's denial of Cox's Request for Number Block Release. Granting this waiver will result in the release of new NPA NXX block of numbers for immediate use to help this customer.

Thank you for your prompt consideration of this matter. Should you have any questions or need additional information, please contact me at 401-274-7200.

Respectfully Submitted,

Cox Connecticut Telcom, LLC

By its Attorneys:



Alan M. Shoer, Esq.

Bar No. 3248

Adler Pollock and Sheehan P.C.

One Citizen's Plaza

Providence, Rhode Island 02903-1345

AMS/bck

Enclosure

461356_1.doc

¹³ CRV Decision in Docket 3607 at 3.

1

2005 R.I. PUC LEXIS 32, *

IN RE: **COX** RHODE ISLAND TELCOM, LLC **WAIVER REQUEST** FOR **NUMBER** BLOCK
RELEASE -- CAREY, RICHMOND & VIKING INSURANCE

DOCKET NO. 3702

Rhode Island Public Utilities Commission

2005 R.I. PUC LEXIS 32

November 8, 2005, Issued

CORE TERMS: block, customer, utilization, carrier, certifying, assigned, unused, zero, area code, preserving, conserve, putting, phone

PANEL: [*1] Elia Germani, Chairman; Robert B. Holbrook, Commissioner; Mary E. Bray, Commissioner

OPINION: REPORT AND ORDER

I. OVERVIEW

On October 17, 2005, **Cox** Rhode Island Telcom, L.L.C. ("**Cox**"), filed a **request** with the Public Utilities Commission ("Commission") for a **waiver** from the denial by the North American **Number** Pooling Administrator ("NANPA") of **Cox's request** to release certain blocks of **numbers** for **Cox's** customer, Carey, Richmond & Viking Insurance ("the Customer"). Specifically, **Cox** had requested 5 **numbers** in thousands blocks that do not begin with NPA NXX 0000, 1000, 3000 or 9000. **Cox** has been assigned the thousand block NPA NXX 0000 (area code -- exchange -- block). The Customer is expanding its business and would like to have additional direct inward dial **numbers** ("DIDs"). The DIDs cannot begin with zero because the internal phone system is set up to send all callers who hit zero to the switchboard. This is the same customer who was the subject of Commission Order No. 17870 (issued June 14, 2004).

II. HISTORY OF COMMISSION'S **WAIVER** ORDERS

In Docket No. 3567, Order No. 17622 (issued December 1, 2003), **Cox** had a customer seeking specific blocks of **numbers**. The customer was seeking [*2] to install a DID system and further, to have the new **numbers** match the old extensions, thus prompting a **request** for specific blocks which **Cox** did not already have. In that case, **Cox** did not have a 70% utilization rate on its assigned blocks, but rather, only had a 51% utilization rate on the remaining **numbers** it had available for customers.

The **request** in Docket No. 3567 was an issue of first impression for the Commission. The Commission noted that the purpose of the utilization percentage is to conserve unused **numbers** in order to extend the life of the NPA. In light of the importance of conserving **numbers** and preserving the NPA, the Commission set initial minimum standards that must be met by a carrier in order for the Commission to consider a **request** for a **waiver**. The Commission found that a carrier must have a utilization rate over 50% and must have a customer ready, willing and able to utilize at least 60% of the **numbers** within the requested blocks either immediately, or in the very near future. This in no way was meant to suggest that the Commission will automatically approve every **request** that meets these minimum standards. The Commission stated that it must review each **request** [*3] on a case by case basis for reasonableness and to keep some control on the release of blocks.

In Docket No. 3607, the customer required less than 10 percent of a block. **Cox** met the Commission's first standard regarding utilization rate but not the second standard of **numbers** to be put into service. However, **Cox** indicated that because the customer is requesting less than 10 percent of a block, **Cox** could return the remaining **numbers** to the Pooling Administrator (NANPA) for assignment to another carrier, thus preserving the blocks. Return of 90% of the block would prevent stranding a large amount of unused **numbers**. Although **Cox** did not meet the threshold set forth in Order No. 17622 (issued December 1, 2003), **Cox** did have a 51% utilization level, had a customer desiring to do business with **Cox** and take **numbers** immediately, and had agreed to return the unused **numbers** to the Pooling Administrator, the Commission allowed the **waiver request** for the release of an available block of **numbers**, other than NPA NXX 0000, 1000, 3000 or 9000. **Cox** was required to file with the Commission a copy of the Part 4 (certifying **numbers** in service) and a copy of the Block Donation Form (certifying return [***4**] of a block) that it needed to file with NANPA. Return of the block was to be made within 30 days of commencing service with the customer. **Cox** complied with the Commission's Order.

III. COMMISSION FINDINGS

In order for a carrier to receive an additional block of **numbers**, the Federal Communications Commission ("FCC") has determined that the carrier must have a 75 percent utilization rate. **Cox's** current utilization rate is 66.7 percent. Therefore, it does not meet the FCC's requirement. However, it does meet the Commission's first standard for seeking a **waiver**. This case mirrors the prior Commission holding in Docket No. 3607, with the exception of the amount of **numbers** required by the Customer. The Customer will still require less than 10 percent of a block. Therefore, once, again, the Commission will allow the **waiver request** for the release of an available block of **numbers**, other than NPA NXX 0000, 1000, 3000 or 9000. **Cox** shall file with the Commission a copy of the Part 4 (certifying **numbers** in service) and a copy of the Block Donation Form (certifying return of a block) that it needed to file with NANPA. Return of the block was to be made within 30 days of putting the **numbers** into [***5**] service.

The Commission again cautions that carriers should make every effort to work with customers to avoid the need to seek a **waiver** and maximize the utilization of the **numbers** to which the carrier is assigned. The **Number** Pooling Rules are in place to conserve the 401 area code. However, in this case, **Cox** was assigned a **number** block that begins with zero which causes problems with internal phone systems and is viewed as a somewhat unique situation.

Accordingly, it is

(18415) ORDERED:

1. That **Cox's request** for a **waiver** from the denial of the release of a thousand block other than the following NPA NXX 0000, NPA NXX 1000, NPA NXX 3000, and NPA NXX 9000 is granted.
2. **Cox** shall file with the Commission a copy of the Part 4 (certifying **numbers** in service) and a copy of the Block Donation Form (certifying return of a block) that it will need to file with NANPA.
3. Return of the block shall be made within 30 days of putting the **numbers** into service.

EFFECTIVE AT WARWICK, RHODE ISLAND ON OCTOBER 26, 2005 PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED ON NOVEMBER 8, 2005.

PUBLIC UTILITIES COMMISSION

Elia Germani, Chairman *

* Chairman Germani concurs but is unavailable [***6**] for signature.

Robert B. Holbrook, Commissioner

Mary E. Bray, Commissioner

Source: [Rhode Island > Find Statutes, Regulations, Administrative Materials & Court Rules > By Administrative Materials > RI Public Utilities Commission Decisions](#) 

Terms: **Cox request for waiver of numbers** ([Edit Search](#) | [Suggest Terms for My Search](#) | [Feedback on Your Search](#))

View: Full

Date/Time: Monday, July 14, 2008 - 5:05 PM EDT



[About LexisNexis](#) | [Terms & Conditions](#) | [Contact Us](#)

Copyright © 2008 LexisNexis, a division of Reed Elsevier Inc. All rights reserved.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: COX RHODE ISLAND TELCOM, LLC :
WAIVER REQUEST FOR NUMBER BLOCK : DOCKET NO. 3607
RELEASE – CAREY, RICHMOND & VIKING :
INSURANCE :

REPORT AND ORDER

On May 13, 2004, Cox Rhode Island Telcom, L.L.C. ("Cox"), filed a request with the Public Utilities Commission ("Commission") for a waiver from the denial by the North American Number Pooling Administrator ("NANPA") of Cox's request to release certain blocks of numbers for Cox's customer, Carey, Richmond & Viking Insurance ("the Customer"). Specifically, Cox had requested 9 numbers in thousands blocks that do not begin with NPA NXX 0000, 1000, 3000 or 9000. Cox has been assigned the thousand block NPA NXX 0000. The Customer is expanding the business and would like to have direct inward dial numbers ("DID's") that will match the current four digit internal extensions. The DIDs cannot begin with zero because the internal phone system is set up to send all callers who hit zero to the switchboard.

In Docket No. 3567, Order No. 17622 (issued December 1, 2003), Cox had a customer seeking specific blocks of numbers. The customer was seeking to install a DID system and further, to have the new numbers match the old extensions, thus prompting a request for specific blocks which Cox did not already have. In that case, Cox did not have a 70% utilization rate on its assigned blocks, but rather, only had a 51% utilization rate on the remaining numbers it had available for customers.

The request in Docket 3567 was an issue of first impression for the Commission. The Commission noted that the purpose of the utilization percentage is to conserve

unused numbers in order to extend the life of the NPA. In light of the importance of conserving numbers and preserving the NPA, the Commission set initial minimum standards that must be met by a carrier in order for the Commission to consider a request for a waiver. The Commission found that a carrier must have a utilization rate over 50% and must have a customer ready, willing and able to utilize at least 60% of the numbers within the requested blocks either immediately, or in the very near future. This in no way was meant to suggest that the Commission will automatically approve every request that meets these minimum standards. The Commission stated that it must review each request on a case by case basis for reasonableness and to keep some control on the release of blocks. Furthermore, if the Commission found that its ruling in Docket No. 3567 resulted in an influx of waiver requests, the Commission reserved its right to tighten the minimum standards in order to protect the NPA.

In this instance, Cox's current utilization of its block is at 51%, so Cox meets the first standard. However, the Customer only requires nine numbers from a thousand number block not beginning with NPA NXX 0000, NPA NXX 1000, NPA NXX 3000 or NPA NXX 9000. Therefore, Cox does not meet the second standard. However, Cox has made an argument regarding why it should be granted the waiver nonetheless. Cox has indicated that because the customer is requesting less than 10% of a block, Cox can return the remaining numbers to the Pooling Administrator (NANPA) for assignment to another carrier. Return of 90% of the block will prevent stranding a large amount of unused numbers.

Cox has maintained that this will meet the objectives outlined by the Commission in Order No. 17622 because it will maximize the number conservation within the block

and will further preserve the NPA, while allowing the customer a choice of competitive carriers.

After reviewing Cox's request on a case-specific basis, the Commission finds that although Cox has not met the threshold set forth in Order No. 17622 (issued December 1, 2003), Cox does have a 51% utilization level, has a customer desiring to do business with Cox and take numbers immediately, and has agreed to return the unused numbers to the Pooling Administrator, the Commission will allow the waiver request for the release of an available block of numbers, other than NPA NXX 0000, 1000, 3000 or 9000. Cox shall file with the Commission a copy of the Part 4 (certifying numbers in service) and a copy of the Block Donation Form (certifying return of a block) that it will need to file with NANPA. Return of the block shall be made within 30 days of commencing service with the customer.

The Commission again cautions that carriers should make every effort to work with customers to avoid the need to seek a waiver, maximizing on the utilization of the numbers to which the carrier is assigned. The Number Pooling Rules are in place to conserve the 401 area code. In this case, Cox was assigned a number block that begins with zero. This causes problems with internal phone systems and is viewed as a somewhat unique situation.

Accordingly, it is

(17870) ORDERED:

1. That Cox's request for a waiver from the denial of the release of a thousand block other than the following NPA NXX 0000, NPA NXX 1000, NPA NXX 3000, and NPA NXX 9000 is granted.

2. Cox shall file with the Commission a copy of the Part 4 (certifying numbers in service) and a copy of the Block Donation Form (certifying return of a block) that it will need to file with NANPA.
3. Return of the block shall be made within 30 days of commencing service with the customer.

EFFECTIVE AT WARWICK, RHODE ISLAND ON JUNE 10, 2004
PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED ON
JUNE 14, 2004.

PUBLIC UTILITIES COMMISSION

Elia Germani, Chairman

*Kate F. Racine, Commissioner

Robert B. Holbrook, Commissioner

* Commissioner Racine did not participate in the decision.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: COX RHODE ISLAND TELCOM, LLC :
WAIVER REQUEST FOR NUMBER BLOCK : DOCKET NO. 3567
RELEASE - TORAY PLASTICS OF AMERICA :

REPORT AND ORDER

On November 3, 2003, Cox Rhode Island Telcom, L.L.C. ("Cox"), filed a request with the Public Utilities Commission ("Commission") for a waiver from the denial by the North American Number Pooling Administrator ("NANPA") of Cox's request to release certain blocks of numbers for Cox's customer, Toray Plastics of America ("Toray"). Specifically, Cox had requested 1,800 numbers in specific thousands blocks beginning with NPA NXX 2000, 3000, and 4000.¹

Because Cox's utilization rate (the percentage of numbers within the blocks currently assigned to Cox that are in service) is at fifty-one percent (51%), which is 19% below Rhode Island's required 70% utilization rate, Cox's request for the specific blocks was denied. In other words, Cox is not allowed, unless granted a waiver by the Commission, to obtain new blocks of numbers unless at least 70% of the numbers assigned to it are in use. The purpose of this rule is to preserve Rhode Island's available telephone numbers, thus preserving the 401 area code (or "NPA").

According to an attachment to Cox's filing, Toray is ready, willing and able to utilize 60% of the numbers as soon as they are made available to Cox. Toray currently has a PBX system whereby a person calls a main number and is connected to a Toray representative via a four digit extension. Toray desires to allow for direct dialing to its representatives using the four digit extensions. In other words, if a Toray representative

¹ Within the NPA NXX, Cox only has the thousands blocks beginning with 0000 and 7000 assigned to it.

is currently assigned the extension 2345, that representative's direct number will end in 2345. In response to Commission data requests, Cox indicated that the numbers it is seeking are not currently assigned to someone else. Furthermore, Cox will put 1,800 of the 3,000 requested numbers into service immediately.

This is an issue of first impression for the Commission. As noted above, the purpose of the utilization rate is to conserve unused numbers in order to extend the life of the NPA. In light of the importance of conserving numbers and preserving the NPA, the Commission must set initial minimum standards that must be met by a carrier in order for the Commission to even consider a request for a waiver. In this case, Cox has a utilization of over 50% and it has a customer who is ready, willing and able to utilize at least 60% of the requested numbers as soon as they are available to Cox. The other 40% will be available for Cox to assign to either Toray, if it needs additional lines, or to other customers.

The Commission adopts these standards as the minimum that must be met in order for the Commission to consider a request for a waiver. A carrier must have a utilization rate over 50% and must have a customer ready, willing and able to utilize at least 60% of the numbers within the requested blocks either immediately, or in the very near future. This in no way is meant to suggest that the Commission will automatically approve every request that meets these minimum standards. The Commission must review each request on a case by case basis for reasonableness and to keep some control on the release of blocks. For example, if a carrier files a petition seeking 10 thousands blocks and will only put 6,000 numbers in place, leaving 4,000 numbers not in use, the Commission may very well find that it is unreasonable to have the equivalent of four

blocks not in use when a carrier's utilization rate is below 70%. Furthermore, if the Commission finds that this ruling results in an influx of waiver requests, the Commission reserves its right to tighten the minimum standards in order to protect the NPA.

Because Cox's application has satisfied the minimum standards adopted today, the Commission approves Cox's request for a waiver from the denial of the release of the requested thousands blocks in question.

Accordingly, it is

(17622) ORDERED:

1. That Cox's request for a waiver from the denial of the release of the three requested thousands blocks in question is granted.

EFFECTIVE AT WARWICK, RHODE ISLAND ON NOVEMBER 21, 2003
PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED ON
DECEMBER 1, 2003.

PUBLIC UTILITIES COMMISSION

Elia Germani, Chairman

Kate F. Racine, Commissioner

Robert B. Holbrook, Commissioner

2



GTECH[®]
Architects of Gaming

July 10, 2008

Mike Rigney
Cox Business Services
9 JP Murphy Highway
West Warwick, RI 02893

Mike:

The DID number range that you have provided, (385-3300-3399), will not work due to a numbering conflict within our Global PBX Network. We will need a DID number range whereby the last 4 digits start with a 2, 5, or 7. Thank much.

Thank you,

Vikki

Vikki Poulos
Supervisor

GTECH Corp
10 Memorial Blvd
Providence, RI 02903

3

Pooling Administration System

 sandra.gore@cox.com (SP)

[Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **66.700 percent**. The FCC requires a utilization of **75.000 percent**.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option



Pooling Administration System

anne.henderson@cox.com (SP)

Time : 07/10/2008 02:01:11 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

Part 1A

Type of Application : New Block

[View Pool Replenishment Status](#)

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your us

Block Applicant :

Company Name **COX RI TELECOM**

Headquarters Address: **5775 Peachtree Dunwoody Road**

City: **Atlanta**

State: **GA**

Zip: **30342**

Contact Name **Anne Henderson**

Contact Address **5775 Peachtree Dunwoody Road**

City **Atlanta**

State **GA**

Zip **30342**

Telephone **404-269-8738**

Fax **404 132**

E-mail **NOC.TN@COX.COM**

Pooling Administrator II:

Contact Name **Dora Wirth**

Contact Address **1800 Sutter St**

City **Concord**

State **CA**

Zip **94520**

Telephone **925-363-8706**

Fax **925 768**

E-mail **dora.wirth@neustar.com**

1.2 General Information

NPA **401**

LATA * **130**

OCN lv* **8778-COX RI TELECOM**

Parent

Company OCN * **7987**

Number of
Thousands-
Blocks **1**

Requested

Switch

Identification
(Switching
Identity/POI)** **WWWKRIDBDS0**

City or Wire Center
Name

Pooling Administration System

Rate Center ^{vi} **COVENTRY**

Rate Center Sub
Zone

1.3 Dates

Date of Application ^{vii} **Thursday, July 10, 2008**

Request Expedited Treatment Yes No

Requested Effective Date ^{viii} **08/10/2008** (MM/DD/YYYY)

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider* **CAP OR CLEC**

b) Primary Type of Service Blocks to be used for* **Wireline**

401.385.7

c) Thousands-Block(s) (NPA-NXX-X) assignment preference
Click here to see the available blocks in the pool.

NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks

are not available.

d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any

1.5 Type of Request*

- Initial block for rate center
 - Growth block for rate center
- Or

By selecting this checkbox, I acknowledge that I am willing to accept a block in red ar explicitly understand that the underlying code may not yet be activated in the PSTN a loaded in the NPAC on the block effective date.

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the bes knowledge and that this application has been prepared in accordance with the Thousands-Block (NX Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org>) by contacting inc@atis.org as of the date of this application.

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

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the c name, company headquarters address, a contact within the company, an address where the contact may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing N (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also l submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its pa company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administrator addition, the number of thousands-blocks requested should be supplied. The Switch Identification as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem facilities based provider^{XI}. Explanations of these terms may be found in the footnotes.

Pooling Administration System

anne.henderson@cox.com (SP)

Time : 07/10/2008 02:07:08 PM EDT

- [-] Individual Block Requests
 - [-] New Block Request
 - [-] New Block Reservation
 - [-] Assign/Cancel Reservation
 - [-] Block Modification
 - [-] Block Disconnect
 - [-] Saved Block Requests
 - [-] Modify Pending Request
- [-] CO/NXX Code Requests
- [-] Confirm Resources In Service
- [-] Donate Blocks
- [-] Submit Forecast
- [-] Search Forms
- [-] Reports
- [-] User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Lev

Date **Thursday, July 10, 2008**

OCN **8778**

Company Name **COX RI TELECOM**

Rate Center **COVENTRY**

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)

401.385.3
401.385.9

Name of Block Applicant **Anne Henderson**

Title **AMA Coordinator**

Telephone Number **404-269-8738**

Fax Number **404-269-1321**

E-Mail **NOC.TN@COX.COM**

A. Available Numbers * **287**

B. Assigned Numbers * **1420**

C. Total Numbering Resources * **2000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ² * **0**

List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months³ *

Month 1	14	Month 2	18
Month 3	0	Month 4	0
Month 5	22	Month 6	98

F. Forecast - Next 12 months⁴ *

Month 1	25	Month 2	25
Month 3	25	Month 4	25
Month 5	25	Month 6	25
Month 7	25	Month 8	25
Month 9	25	Month 10	25
Month 11	25	Month 12	25

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **25.0**

H. Months to Exhaust⁵ (Numbers Available for Assignment to customers (A) / Average Monthly Fore

Block Requested	A. Available Numbers	H. Months to Exhau
1	287	11.480

I. Utilization⁶(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers 100

Explanation

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
² Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the applicant. The quantity 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 TNs).
³ Net change in TNs no longer available for assignment in each previous month, starting with the most recent month as Month #1, and Month #6 as the current month.
⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
⁵ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than 12 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(iii)).

Pooling Administration System



anne.henderson@cox.com (SP)

• Sign Out

Time : 07/10/2008 02:07:41 PM EDT

- Individual Block Requests
 - New Block Request
 - New Block Reservation
 - Assign/Cancel Reservation
 - Block Modification
 - Block Disconnect
 - Saved Block Requests
 - Modify Pending Request
- CO/NXX Code Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
- User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

Your Utilization calculates to 71.000%. The FCC required the utilization of 75.000%.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver

Question? Email us
© 1997-2012 NeuStar, Inc.
Legal Notice

Sent: Friday, July 11, 2008 1:08 PM
To: Gandonu, Viwanu (CCI-New England); NOC TN Admin
Subject: Suspended-Denied Request form.doc

Second time should be a charm Viwanu!



NUMBERING SOLUTIONS ADMINISTRATION

Friday, July 11, 2008

From: Numbering Solutions Administration

Subject: Denied Internal Number Request

This email is regarding the Internal Number request submitted for the rate center of Conventry on Thursday, July 10, 2008

The Internal Number received was invalid due to the following reason(s).

- Forecast not on file
- Utilization threshold does not meet NRO requirements
- Months to Exhaust exceeds NRO requirements
- Incomplete application
- Edited Utilization Summary
- Invalid TN Assignments
- Sent to wrong Fax Number/email
- Other

Remarks: The MTE calculation and the Utilization on the Internal Projection Worksheet does not meet the NRO requirements. In order to receive a new block, you must request a state waiver.

Sincerely,

Numbering Solutions Administration Group
Cox Communications, Inc.