



March 11, 2010

Ms. Luly Massaro
Commissions Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Request for Waiver of NANPA's Denial of Request for 1000 Numbers to serve N. Kingstown rate center

Ms. Massaro:

The purpose of this letter is to seek a waiver of NANPA's (ie, NeuStar) decision to denying AT&T's request for 1000 numbers in order to permit AT&T to provide service to the 143 Communications Flight Rhode Island Air National Guard ("Customer"). In submitting this waiver request to the Rhode Island Public Utilities Commission ("Commission"), AT&T notes that when NeuStar denies the release of necessary numbers, a carrier may appeal to the Commission for relief. Because the Customer is anxious to receive these numbers, we respectfully request that the Commission address this waiver request as soon as possible.

143 Communications Flight (143 CF) Rhode Island Air National Guard, located at the Quonset Ang Base in North Kingstown, Rhode Island requested 1000 numbers in the North Kingstown rate center. They are specifically asking for numbers of the format of 401-NXX-3XXX and they will be activating the entire block. This growth is necessary to accommodate a new unit moving from Coventry and having them integrate into an existing and complex direct inward dial (DID) and on-base internal network configuration.

On March 1, 2010, AT&T submitted a Central Office Code (NXX) Assignment Request (Part 1A) to NeuStar, requesting a block to meet the customer's need. The Company does not have a 3-block (we own only a 9-block in North Kingstown). The Pooling Administration System (PAS) generated an error message on the grounds of our NOT meeting the rate center based months-to-exhaust (MTE) threshold of 6 months AND the utilization threshold of 75%. Our MTE is 5.934 and utilization is .3%. The denial was based entirely upon our not meeting the MTE and utilization thresholds; notwithstanding the fact that AT&T does not have the specific 3-block needed to satisfy the customer's request. A copy of the denial is attached.

By way of this letter, AT&T requests that the commission overturn NeuStar's decision and order that 1000 numbers be assigned to AT&T in the North Kingstown rate center to serve 143 CF. The Commission has the authority to take such action pursuant to the FCC's Numbering Resource Optimization ("NRO") Third Report and Order and Second Order of Reconsideration (FCC 01-362), released December 28, 2001, in CC Docket NO. 96-98 and CC Docket No. 99-200 ("Third NRO Order").

Respectfully submitted,



Dale C. Morgenstern
AT&T - Network Regulatory
One AT&T Way – Suite 4D146
Bedminster, NJ 07921
O: 908-234-5120
C: 201-960-6668

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: **401-NO KINGSTN-RI-345295**
Individual Block Request

Type of Application: New Change ⁱ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **TCG RHODE ISLAND**

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

City, State, Zip: **Bedminster, NJ, 07921**

Contact Name: **Tammy Bryant**

Contact Address: **358 Old Main Street**

City, State, Zip: **Asbury, NJ, 08802**

Phone: **908-788-4514** FAX: **210-893-2281** E-mail: **tbryant@att.com**

Pooling Administrator: ⁱⁱ

Contact Name: **Dora Wirth**

Contact Address: **1800 Sutter St**

City, State, Zip: **Concord, CA, 94520**

Phone: **925-363-8706** FAX: **925-363-7684**

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

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: 401 LATA: 130 OCN: ^{iv} 7351 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
PRVDRIUFDS1

City or Wire Center Name : PRVDRIUFDS1 Rate Center: ^{vi} NO KINGSTN

Rate Center Sub Zone: NO KINGSTN

1.3 Dates:

Date of Application: ^{vii} 03/01/2010 Requested Block Effective Date: ^{viii}
04/01/2010

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.

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

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) 401-267-3 OR 401-522-3
- 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 X 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 : _____
- e) 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 (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Tammy Bryant

**Associate
Technical
Support Analyst** 03/01/2010

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 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 section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **401-NO KINGSTN-RI-345295**

Date: **03/01/2010**

OCN: **7351**

Company Name: **TCG RHODE ISLAND**

Rate Center: **NO KINGSTN**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **401-372-9**

Name of Block Applicant: **Tammy Bryant**

Signature: **Tammy Bryant**

Title: **Associate Technical Support Analyst**
FAX No.: **210-893-2281**

Telephone No.: **908-788-4514**

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

A. Available Numbers: **989**

B. Assigned Numbers: **3**

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 ²: **0**

List
Excluded
Code(s) or **0**
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	0	0	2	-8	0	0						
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months³

F. Forecast

- Next 12 months⁴ **1000 0 0 0 0 0 0 0 0 0 0 0**

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):**166.667**

H. Months to Exhaust⁵
 =

Numbers Available for Assignment to Customers(A)

Average Monthly Forecast(G)

Block Requested
1

Available Numbers
989

Months To Exhaust
5.934

I.

Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 = \mathbf{0.3}$

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

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.

²Quantity 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).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

November 21, 2003
ATIS-0300066.at3

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Attachment 3

Pooling Administrator's Response/Confirmation
TBPA Part 3

Tracking Number : 401-NO KINGSTN-RI-345295

Date of Application: 03/01/2010 Effective Date: _____
Date of Receipt: 03/01/2010 Date of Response: 03/01/2010

Service Provider Name: TCG RHODE ISLAND
(Telcordia™ LERG™ Routing Guide) OCN: 7351

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dora Wirth Phone: 925-363-8706

Signature of Pooling Administrator

Dora Wirth Fax: 925-363-7684

Name (print)

Email: dora.wirth@neustar.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 : _____

Switch Identification(Switch Entity/POI): ¹ PRVDRIUFDS1
Rate Center: NO KINGSTN
Rate Center Sub Zone: NO KINGSTN

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 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.)

02/26/2010 09:54

4010061230

143CF

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**143 COMMUNICATIONS FLIGHT
RHODE ISLAND AIR NATIONAL GUARD
QUONSET ANG BASE
NORTH KINGSTOWN, RHODE ISLAND 02882**



Date: 2-25-2010

**143 AW Communications Flight
Rhode Island Air National Guard
North Kingstown, RI 02852**

AT&T Number Administration/Code Administration;

This Letter of Intent represents a request by 143rd CF (Communications Flight) for 1000 new consecutive numbers in NPA-NXX-3XXX block for Prime Service. 143rd CF intends to order service, in the North Kingston, RI rate center, on the PRVDRIUFDSI(P) switch pending AT&T's successful completion of the required testing. 143rd CF intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

143rd CF currently has an existing network configuration and therefore technical restrictions exist in the following blocks:

**Block 0 (0000-0999): _ This block does not meet DOD dialing requirements for base
Block 1 (1000-1999): __ This block does not meet DOD dialing requirements for base
Block 2 (2000-2999): __ This block does not meet DOD dialing requirements for base
Block 3 (3000-2999): __ This block meets the DOD dialing access and plan standards
Block 4 (4000-4999): __ This block does not meet DOD dialing requirements for base
Block 5 (5000-5999): __ This block does not meet DOD dialing requirements for base
Block 6 (6000-6999): __ This block does not meet DOD dialing requirements for base
Block 7 (7000-7999): __ This block does not meet DOD dialing requirements for base
Block 8 (8000-8999): __ This block does not meet DOD dialing requirements for base
Block 9 (9000-9999): __ This block does not meet DOD dialing requirements for base**

The current set of numbers does not allow for conformance with mandated Department of Defense (DOD) dialing access and plan Standards. The requested 1000 new numbers in the 3XXX - 3999 will meet these standards. We will return all existing numbers to the pool when the new numbers become effective.

The 143rd CF requires these numbers to meet pending growth at the base, to conform to DOD standards and to continue to support the DOD war-fighting mission of the 143rd CF. We need these numbers as soon as possible with a need date of 30 May 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D Anthon".

**Michael D Anthon, Lt. Col, RIANG
Commander, 143 Communications Flight**