



May 9, 2012

Ms. Cindy Wilson-Frias
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Request for Waiver of NANPA's Denial of Request for 200 Numbers to serve Woonsocket rate center

Ms. Wilson-Frias:

The purpose of this letter is to seek a waiver of NANPA's (ie, NeuStar) decision to denying AT&T's request for 200 numbers in order to permit AT&T to provide service to CVS. 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.

CVS Caremark is the largest pharmacy health care provider in the United States with integrated offerings across the entire spectrum of pharmacy care. They are a pharmacy company, positioned to engage members in behaviors that improve their health and lower overall health care costs for health plans, sponsors and members. CVS Caremark is a market leader in mail order pharmacy, retail pharmacy, specialty pharmacy, and retail clinics, and is a leading provider of Medicare Part D Prescription Drug Plans. They are specifically asking for numbers such that the NXX does not begin with 9 AND the line number is of the format: XX00 through XX99.

On May 8, 2012, 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 has an adequate supply of numbers but NOT of the format: 00XX-0099. 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 502 months and utilization is 13.6%. The denial was based entirely upon our not meeting the MTE and utilization thresholds. 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 200 numbers be assigned to AT&T in the Woonsocket rate center to serve CVS. 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

Part 1A

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TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: **401-
WOONSOCKET-
RI-534259**
**Individual Block
Request**

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION**1.1 Contact Information:****Block Applicant:**

Company Name: **AT&T LOCAL**
 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: **John Auerbach**
 Contact Address: **1800 Sutter St. Ste. 780**
 City, State, Zip: **Concord, CA, 94520**
 Phone: **925-363-8706** FAX: **925-363-7684**
 E-mail: **john.auerbach@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

Part1A

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NPA: 401 LATA: 130 OCN: ^{iv} 7421 Parent Company's OCN 7421

Number of Thousands-Blocks Requested : 1

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

City or Wire Center Name : _____ Rate Center: ^{vi}
PRVDRIGRXXB WOONSOCKET

Rate Center Sub Zone: WOONSOCKET

1.3 Dates:

Date of Application: ^{vii} 05/08/2012 Requested Block Effective Date:
^{viii} 06/08/2012

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) _____
401-733-2-5
- 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 : _____
- 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 (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Tammy Bryant

Signature of Block Applicant

**Sr.
Specialist**

**: 05/08/2012
Network
Support**

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

MTE Block

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-WOONSOCKET-RI-534259

Date: 05/08/2012

OCN: 7421

Company Name: AT&T LOCAL

Rate Center: WOONSOCKET

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): NPA NXX BLOCK ID 401 733 A 401 733 0

Name of Block Applicant: Tammy Bryant

Signature: Tammy Bryant

Title: Sr. Specialist - Network Support

Telephone No.: 908-788-4514

FAX No.: 210-893-2281

E-mail: tbryant@att.com

A. Available Numbers: 502

B. Assigned Numbers: 136

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 Block(s): 0

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
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E. Growth History - Previous 6	<u>0</u>	<u>0</u>	<u>-279</u>	<u>0</u>	<u>0</u>	<u>200</u>					
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MTE Block

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months³

F. Forecast

- Next 12 months⁴

<u>200</u>	<u>-21</u>	<u>-113</u>	<u>-32</u>	<u>-36</u>	<u>-4</u>	<u>-3</u>	<u>-2</u>	<u>0</u>	<u>3</u>	<u>4</u>	<u>-14</u>
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): -1.0

H. Months
to Exhaust⁵

Numbers Available for Assignment to
Customers(A)

=

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

502

Months To Exhaust

-502.00

I.

Utilization⁶ $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 = \underline{13.6}$

=

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))

Part3

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November 21, 2003
 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
 TBPAG Part 3

Tracking Number : 401-
 WOONSOCKET-RI-
 534259

Date of Application: 05/08/2012 Effective Date: _____
 Date of Receipt: 05/08/2012 Date of Response: 05/08/2012

Service Provider Name: AT&T LOCAL
 (Telcordia™ LERG™
 Routing Guide) OCN: 7421

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706
 Signature of Pooling Administrator
John Auerbach Fax: 925-363-7684
 Name (print)
 Email: john.auerbach@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 : _____

Switch Identification(Switch Entity/POI): 1 PRVDRIGRXXB
 Rate Center: WOONSOCKET
 Rate Center Sub Zone: WOONSOCKET

 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.

Part3

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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.)



May 2, 2012

**CVS Caremark
1 CVS Drive
Woonsocket, RI 02895**

AT&T Number Administration/Code Administration;

This Letter of Intent represents a request by CVS Caremark for 200 numbers for ADL Service. CVS Caremark intends to order service, in the WOONSOCKET rate center, on the SPFDMABRDS0 switch pending AT&T's successful completion of the required testing. CVS Caremark intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

CVS Caremark currently has an existing network configuration and therefore technical restrictions exist. The exchange can't start with a 9. The last 2-digits need to start with XX00 and end in XX99 - The numbers MUST be consecutive.

Block	0	(0000-0999): _____
Block	1	(1000-1999): _____
Block	2	(2000-2999): _____
Block	3	(3000-3999): _____
Block	4	(4000-4999): _____
Block	5	(5000-5999): _____
Block	6	(6000-6999): _____
Block	7	(7000-7999): _____
Block	8	(8000-8999): _____
Block	9	(9000-9999): _____

CVS Caremark is the largest pharmacy health care provider in the United States with integrated offerings across the entire spectrum of pharmacy care. We are a pharmacy innovation company, uniquely positioned to engage plan members in behaviors that improve their health and to lower overall health care costs for health plans, plan sponsors and their members. CVS Caremark is a market leader in mail order pharmacy, retail pharmacy, specialty pharmacy, and retail clinics, and is a leading provider of Medicare Part D

Prescription Drug Plans. As one of the country's largest pharmacy benefits managers (PBMs), we provide access to a network of more than 65,000 pharmacies, including more than 7,300 CVS/pharmacy® stores that provide unparalleled service and capabilities. Our clinical offerings include our signature Pharmacy Advisor™ program as well as innovative generic step therapy and genetic benefit management programs that promote more cost effective and healthier behaviors and improve health care outcomes.

As of December 31, 2011, we employ approximately 200,000 colleagues in 44 states, the District of Columbia, and Puerto Rico. We operate more than 7,327 retail stores, 30 onsite pharmacies, 31 specialty pharmacy stores, 13 specialty mail order pharmacies, four mail order pharmacies, and our CVS.com and Caremark.com websites. In addition, our MinuteClinic division runs approximately 657 retail health care clinics.

In the state of RI, in addition to approximately 60 CVS Pharmacy stores, we also have the following locations. CVS will require an additional 300 DID's within the next 3 years.

Corporate Headquarters

CVS Caremark Corporation One CVS Drive Woonsocket, RI 02895

Operations Centers

695 George Washington Hwy. Lincoln, RI 02865-4257

Distribution Centers

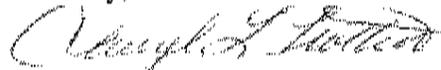
400 Founders Drive Woonsocket, RI 02895-6149

150 Industrial Drive North Smithfield, RI 02896-8034

Regional Offices

25 Blackstone Valley Place Suite 302 Lincoln, RI 02865

Sincerely,



Cheryl Trotter/CVS Caremark/IS Network Services Manager- Corp Telecom