

August 29, 2012

**VIA ELECTRONIC MAIL AND REGULAR MAIL**

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

Re: Cox Rhode Island Telcom, 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, American Power Conversion/Schneider Electric, a commercial customer of Cox located at 132 Fairgrounds Road, West Kingston, RI 02892 (“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.<sup>1</sup> 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.”<sup>2</sup> Because the Customer is anxious to receive these numbers for their business requirements, we respectfully request that the Commission address this waiver request as soon as practicable.

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<sup>1</sup> 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”)

<sup>2</sup> CRV Decision in Docket 3607 at 2.

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## FACTUAL BACKGROUND

Cox has an existing contract with the Customer to provide telecommunications services. This Customer is now requesting that Cox provide 1400 new numbers from two specific one thousand blocks (1000 from one block and four hundred from the second block).<sup>3</sup>

1. Because Cox did not have sufficient numbers available from its existing inventory to meet the customer request Cox applied to the Pooling Administrator on August 1, 2012 for the new block of numbers to accommodate this customer request.<sup>4</sup>

2. On August 2, 2012, the Pooling Administrator rejected Cox's request for these blocks of numbers. The Pooling Administrator determined that Cox's utilization and months to exhaust are not sufficient to allow for new numbers under the rules set by the Numbering Administrator.<sup>5</sup> Cox's current utilization for this rate center (Narragansett) is 74.54 %, and its months to exhaust numbers out of this rate center, is 2.88 months.

## 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.<sup>6</sup> 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:

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

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<sup>3</sup> Copy of Customer request is attached at Tab 1.

<sup>4</sup> Copy of Cox's application to the Pooling Administrator, dated August 1, 2012, is attached at Tab 2.

<sup>5</sup> Copy of the NPA rejection, dated August 2, 2012, is attached at Tab 3.

<sup>6</sup> 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."

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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 Order<sup>7</sup> 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 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.<sup>8</sup>

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<sup>7</sup> *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").

<sup>8</sup> *Id.* at ¶ 64.

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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)<sup>9</sup> 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.”<sup>10</sup>

In this request filed on behalf of Cox, 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 two numbering blocks in the Narragansett rate center because they determined Cox’s utilization of its numbers in this rate center did not hit the requisite percent and/or months to exhaust thresholds.

Because Cox meets the standards set forth in the Commission’s past decisions and the FCC Rules and Orders, 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 blocks of numbers for immediate use to help this customer.

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<sup>9</sup> *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](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-00-429A1.doc).)

<sup>10</sup> *Id.* at ¶ 1.

ADLER POLLOCK & SHEEHAN P.C.

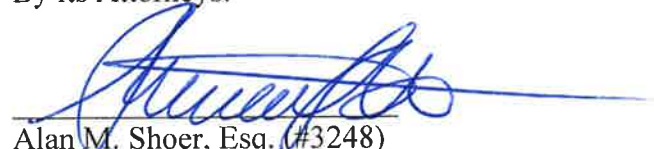
Luly Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
August 29, 2012

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. (#3248)  
Adler Pollock and Sheehan P.C.  
One Citizen's Plaza, 8<sup>th</sup> Floor  
Providence, Rhode Island 02903-1345

Enclosures

619267.1

1



To Whom This may Concern,

This letter is for Cox Communications to request 1400 numbers, all of 401-363-7000, and 400 consecutive numbers from 401-363-9000 to 9399, for the company APC by Schneider Electric and address 132 Fairgrounds Rd, West Kingston, RI 02892. Please let me know if I need to do anything else for this request to be completed.

Regards,

A handwritten signature in blue ink that reads "Chris Wortmann".

Chris Wortmann  
Schneider Electric  
Sr. Network Analyst  
585-398-7356

Merlín Gerín  
Square D  
Telemecanique

Schneider Electric  
North American Operating Division  
1360 Dolwick Drive, Suite 200  
Erlanger, KY 41018-3159  
[www.us.Schneider-Electric.com](http://www.us.Schneider-Electric.com)

2



BR 270

From:

06/15/2012 09:15

#161 P.001/001



**Amendment To  
Commercial Services Agreement**  
6/8/2012

<b>Cox Account Rep:</b> Mike Kirby	<b>Cox System Address:</b> 9 A.P. Murphy Hwy West Warwick, RI 02893
<b>Phone Number:</b> 401-615-1321	
<b>Fax Number:</b>	
<b>Legal Company Name:</b> American Power Conversion - North RI	<b>Authorized Customer:</b> Express Analytics
<b>Street Address:</b> 132 FAIRGROUNDS RD	<b>Full Name:</b> Chris Wortmann
<b>City/State/Zip:</b> West Kingston, Rhode Island 02892	<b>Billing Contact:</b> 401-284-1550
<b>Billing Address:</b>	<b>Fax:</b>
<b>City/State/Zip:</b>	<b>Contact Number:</b> 545-268-7358
<b>Cox Account #:</b> 230-2145584-00	<b>Email Address:</b> chris.wortmann@schneider-electric.com

Service Description	Prev QTY	New QTY	Unit Price	Term (Months)	Type	Service Charges	
						Monthly Recurring	One Time Activation & Setup Fees
DDI 100 Number Block - per block *		3	\$15.00	18	New	\$30.00	
<b>Totals:</b>						\$30.00	\$0.00

Description	Quantity	Unit Price	Total Fee

Inter-State Service. By initialing here and signing below, Customer represents that at least 10% of the traffic on the designated circuit(s) is Inter-State in nature or is Internet Traffic. No

Please add 200 did's. We are requesting 401-363-9200 to 6399. Thank you.

<b>Customer Authorized Signature</b>	<b>CoxConn, LLC; Cox Rhode Island Telecom, LLC; Cox Connecticut Telecom, LLC</b>
<b>Signature:</b> <i>Patty A. Rodgers</i>	<b>Signature:</b> <i>Cathy Edmetz (for Mike Rigney)</i>
<b>Print:</b> PATTY RODGERS	<b>Print:</b> Cathy Edmetz
<b>Title Position:</b> Regional Commodity Mgr	<b>Title Position:</b> Strategic Acct Specialist
<b>Date:</b> June 15, 2012	<b>Date:</b> 6/15/2012

BR 270

From:

06/08/2012 07:32

#074 P.001/002



**Commercial Services Agreement**  
4/23/2012

<b>Cox Account Rep:</b> Mike Roney		<b>Cox System Address:</b>	
<b>Phone Number:</b> 401-615-1221		S.J.P. Murphy Hwy	
<b>Fax Number:</b>		West Warwick, RI 02893	
<b>Legal Company Name:</b> American Power Conversion - Model PRI		<b>Full Name:</b> Chris Workman	
<b>Street Address:</b> 132 FAIRGROUNDS RD		<b>Billing Contact:</b> 401-284-1550	
<b>City/State/Zip:</b> West Kingston, Rhode Island 02892		<b>Fax:</b>	
<b>Billing Address:</b>		<b>Contact Number:</b> 888-398-7236	
<b>City/State/Zip:</b>		<b>Email Address:</b> chris.workman@spnelder-electric.com	
<b>Cox Account #:</b> 716-000000-00			

Service Description	Prev QTY	New QTY	Unit Price	Term (Months)	Type	Service Charge	
						Monthly Recurring	One Time Activation & Setup Fees
PRI 230+0 Interface		1	\$0.00	18	New	\$0.00	
Cox Connect PRI Back		1	\$450.00	18	New	\$450.00	
RI - PRI Long Distance		1	\$0.00	N-M	New	\$0.00	
EUCL Bulk Facility Charge		1	\$32.20	N-M	New	\$32.20	
DID 100 Number Block - per block *		12	\$15.00	30	New	\$180.00	
Cox Connect PRI Trunk Installation *		1	\$0.00				\$0.00
<b>Total:</b>						<b>\$662.20</b>	<b>\$0.00</b>

Description	Quantity	Unit Price	Total Fee



Inter-State Service. By initialing here and signing below, Customer represents that at least 30% of the traffic on the designated circuit(s) is Inter-State in nature or is Internet traffic. No

Please install new PRI. We are requesting telephone numbers in the ranges 7000-7999 and 303-9000-9199. Thank you.

By signing this Agreement, you represent that you are the authorized Customer representative and the information above is true and correct. This Agreement binds Customer to the terms and conditions attached to this Agreement and any other terms and conditions applicable to the Services selected above, including without limitation, the Cox tariffs, Service Guides, state and federal regulations, the General Terms, and the Cox Acceptable Use Policy (the "AUP"). Customer acknowledges receipt and acceptance of the AUP and the General Terms by signing this Agreement. This Agreement is subject to credit approval and Customer authorizes Cox to check credit. The prices above do not include applicable taxes, fees, assessments or surcharges which are additional and may change. This proposal is valid provided Customer signs and delivers this Agreement to Cox unchanged within thirty (30) days from the date above. Cox may withdraw this proposal at any time prior to Customer's signature. If, within thirty (30) days after Customer's signature below, Cox determines that Customer's location is not serviceable under Cox's normal installation guidelines, Cox may terminate this Agreement without liability. If Customer terminates or decreases any Service that is part of a bundle offering, the remaining Services shall be subject to price increases for the remaining Term. Both parties agree that each party may use electronic signatures to sign this Agreement. If Cox performs any work including construction or incurs any costs to provide Service to Customer and Customer cancels this Agreement prior to Service installation, Customer shall be liable for Cox's reasonable costs in addition to any other termination charges. I acknowledge that I have read and understand the 911 disclosure in Section 2 of the Service Terms.




















<b>Customer Authorized Signatures</b>		<b>CoxCom, LLC Cox Rhode Island Telecom, LLC Cox Connecticut Telecom, LLC</b>	
<b>Signature:</b> <i>Patty A Rodgers</i>	<b>Signature:</b> <i>Cathy Edington (for Mike Roney)</i>	<b>Print:</b> <i>Patty A Rodgers</i>	<b>Print:</b> <i>Cathy Edington</i>
<b>Title Position:</b> <i>Regional Connectivity Mgr.</i>	<b>Title Position:</b> <i>Strategic Account Specialist</i>	<b>Date:</b> <i>June 1, 2012</i>	<b>Date:</b> <i>6/8/2012</i>

## Pooling Administration System

 [anne.henderson@cox.com \(SP\)](#)  Sign Out

---

Time : 08/01/2012 10:37:37 AM EDT


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

Your request has been successfully submitted.  
The Tracking Number for the request is: **401-NARRAGNSTT-RI-553425**

[Return to Inbox](#)

[View Forms](#)

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Question? Email us  
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3

**Henderson, Anne (CCI-Atlanta)**

**From:** john.auerbach@neustar.biz  
**Sent:** Wednesday, August 01, 2012 10:39 AM  
**To:** NOC TN Admin  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 401-NARRAGNSTT-RI-553425

**Pooling Administration System**

Dated 01-August-2012

November 21, 2003  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

**Tracking Number :** 401-NARRAGNSTT-RI-553425

Date of Application: 08/01/2012 Effective Date: \_\_\_\_\_  
Date of Receipt: 08/01/2012 Date of Response: 08/01/2012

Service Provider Name: COX RHODE ISLAND TELECOM INC  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN: 8778

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): <sup>1</sup>

**WWWKRIDBDS1**

Rate Center:

**NARRAGNSTT**

Rate Center Sub Zone:

\_\_\_\_\_

**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.**

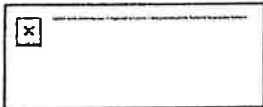
Explanation:

**Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> 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.)



**TN ADMINISTRATION**  
Block Request ID 270

OCN	8778
NPA	401
NPA Relief	
LATA	130
Parent Company OCN	8778
Quantity of Blocks Requested	2
If requesting more than one block, Do you want multiple effective dates?	NO
If requesting more than one block, Do you want multiple switches?	NO
Rate Center	NARRAGNSTT
Rate Center Sub Zone	
Switch Identification	wwwkridbds1
City or Wire Center Name	LEN 401592 0200
Date of Application	2012-07-31 14:45:37.0
Request Expedited Treatment	NO
Requested Effective Date	08-31-2012

Type of Service Provider Requesting the Thousands-Block	
Type of SP	CLEC
Primary type of Service Blocks to be used for	WIRELINE
Thousands-Block(s) (NPA-NXX-X) Assignment preference	4013637 4013639
Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any	
Type of Request	
Remarks	

} OCN 7421  
AT&T Local

Months to Exhaust and Utilization Certification Worksheet	
Codes List NPA(s)-NXX-X(s)	401.284.0, 401.284.1, 401.284.2, 401.284.3, 401.284.4, 401.360.2, 401.792.4
Available Numbers	1082
Assigned Numbers	5218
Total Numbering Resources	7000
Quantity Activated in last 90 days	0
List Excluded Code(s) or Block(s)	

Growth History - Previous 6 Months
------------------------------------

Month 1 - 0	Month 2 - 26	Month 3 - 20
Month 4 - 633	Month 5 - 148	Month 6 - 33

<b>Forecast - Next 12 Months</b>			
Month 1 - 1543	Month 2 - 143	Month 3 - 143	Month 4 - 143
Month 5 - 143	Month 6 - 143	Month 7 - 143	Month 8 - 143
Month 9 - 143	Month 10 - 143	Month 11 - 143	Month 12 - 143

<b>Months to Exhaust and Utilization</b>	
<b>Average Monthly Forecast</b>	376
<b>Months to Exhaust</b>	2.88
<b>Utilization Percentage</b>	74.54 %

<b>Part 1B</b>	
<b>Will Block be activated by NPAC ?</b>	NO
<b>Service Provider NPAC SOA SPID</b>	7661
<b>LRN</b>	
<b>Remarks</b>	



BR270

TN ADMINISTRATION

TN Utilization Summary as of 2012-07-31

OCN: 8778

EOC	LNP	Special Use	Ratecenter	NPA	NOXX	X	Internal Office	Test	Other	Administrative	Assigned	Residential	Business	Aging	Reserved	Unavailable	Available	Shield
EOC	Y		BRISTOL	401	396	5	0	0	0	0	679	45	17	62	5	746	254	238
EOC	Y		BRISTOL	401	396	9	0	1	0	1	872	54	44	98	2	973	27	238
EOC	Y		CAROLINA	401	213	6	0	0	0	0	928	37	11	48	0	976	24	238
EOC	Y		CAROLINA	401	552	7	0	0	0	0	324	8	5	13	0	337	663	238
EOC	Y		CENTREDALE	401	349	0	0	1	0	1	851	35	13	48	0	900	100	238
EOC	Y		CENTREDALE	401	349	2	0	0	0	0	876	45	17	62	1	939	61	238
EOC	Y		CENTREDALE	401	349	3	0	0	0	0	870	28	32	60	0	930	70	238
EOC	Y		CENTREDALE	401	349	4	0	0	0	0	864	24	32	56	0	920	80	238
EOC	Y		CENTREDALE	401	349	5	0	0	0	0	804	35	125	160	6	970	30	238
EOC	Y		CENTREDALE	401	830	5	0	0	0	0	838	2	6	8	0	846	154	238
EOC	Y		COVENTRY	401	385	3	0	0	0	0	737	38	6	44	3	784	216	238
EOC	Y		COVENTRY	401	385	9	0	10	0	10	944	38	2	40	0	994	6	238
EOC	Y		CUMBLND HL	401	405	0	0	1	0	1	864	29	7	36	2	903	97	238
EOC	Y		CUMBLND HL	401	405	3	0	0	0	0	135	1	0	1	0	136	864	238
EOC	Y		GREENWICH	401	336	3	0	0	0	0	364	1	2	3	0	367	633	238
EOC	Y		GREENWICH	401	398	0	0	0	0	0	856	26	18	44	1	901	99	238
EOC	Y		GREENWICH	401	398	1	0	0	0	0	892	2	12	14	0	906	94	238
EOC	Y		GREENWICH	401	398	2	0	22	0	22	853	33	27	60	3	938	62	238
EOC	Y		GREENWICH	401	398	7	0	0	0	0	835	23	42	65	4	904	96	238
EOC	Y		GREENWICH	401	398	8	0	4	0	4	813	23	40	63	1	881	119	238
EOC	Y		HOPEVALLEY	401	491	9	0	0	0	0	882	40	12	52	2	936	64	238
EOC	Y		JAMESTOWN	401	560	0	0	0	0	0	587	43	9	52	1	640	360	238
EOC	Y		LITCOMPTON	401	592	0	0	28	1	29	360	14	9	23	5	417	583	238
EOC	Y		NARRAGNITT	401	284	0	0	0	0	0	937	53	7	60	1	998	2	238

TN Utilization Summary as of 2012-07-31, OCN: 8778

EOC	Y																	31	18	49	0	996	4	238
EOC	Y																	47	10	57	0	997	3	238
EOC	Y																	58	20	78	0	991	9	238
EOC	Y																	14	12	26	0	998	2	238
EOC	Y																	0	0	0	0	0	1000	238
EOC	Y																	13	12	25	404	938	62	238
EOC	Y																	81	15	96	4	1000	0	238
EOC	Y																	49	22	71	2	973	27	238
EOC	Y																	69	18	87	14	997	3	238
EOC	Y																	67	37	104	14	999	1	238
EOC	Y																	63	27	90	0	995	5	238
EOC	Y																	70	32	102	2	929	71	238
EOC	Y																	59	10	69	0	373	627	238
EOC	Y																	3	19	22	0	971	29	238
EOC	Y																	5	2	7	0	889	111	238
EOC	Y																	12	25	37	0	938	62	238
EOC	Y																	10	7	17	1	1000	0	238
EOC	Y																	7	125	132	1	1000	0	238
EOC	Y																	3	1	4	0	886	114	238
EOC	Y																	2	0	2	4	904	96	238
EOC	Y																	0	0	0	0	201	799	238
EOC	Y																	20	33	53	0	924	76	238
EOC	Y																	25	14	39	1	469	531	238
EOC	Y																	36	3	39	2	968	32	238
EOC	Y																	43	8	51	0	940	60	238
EOC	Y																	41	41	82	0	897	103	238
EOC	Y																	74	33	107	3	935	65	238
EOC	Y																	4	6	10	0	876	124	238
EOC	Y																	52	8	60	0	873	127	238

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EOC	Y				401	335	3	0	0	0	0	0	0	825	45	8	53	6	884	116	238
EOC	Y				PAWTUCKET	401	475	0	0	2	0	2	0	831	60	5	65	10	908	92	238
EOC	Y				PAWTUCKET	401	475	1	0	3	0	3	0	810	65	10	75	0	888	112	238
EOC	Y				PAWTUCKET	401	475	2	0	0	0	0	0	834	60	8	68	3	905	95	238
EOC	Y				PAWTUCKET	401	475	3	0	2	0	2	0	776	74	12	86	0	864	136	238
EOC	Y				PAWTUCKET	401	475	4	0	0	0	0	0	800	50	20	70	0	870	130	238
EOC	Y				PAWTUCKET	401	475	5	0	0	0	0	0	844	50	6	56	2	902	98	238
EOC	Y				PAWTUCKET	401	475	6	0	3	0	3	0	849	59	20	79	0	931	69	238
EOC	Y				PAWTUCKET	401	475	7	0	12	0	12	0	790	60	14	74	0	876	124	238
EOC	Y				PAWTUCKET	401	475	8	0	0	0	0	0	787	15	9	24	0	811	189	238
EOC	Y				PAWTUCKET	401	475	9	0	0	0	0	0	783	48	16	64	0	847	153	238
EOC	Y				PAWTUCKET	401	721	5	0	0	0	0	0	766	29	37	66	1	833	167	238
EOC	Y				PAWTUCKET	401	753	7	0	2	0	2	0	700	8	1	9	103	814	186	238
EOC	Y				PORTSMOUTH	401	293	0	0	0	0	0	0	930	42	13	55	5	990	10	238
EOC	Y				PORTSMOUTH	401	293	5	0	0	0	0	0	588	43	19	62	5	655	345	238
EOC	Y				PROVIDENCE	401	228	3	0	4	0	4	0	905	41	20	61	2	972	28	238
EOC	Y				PROVIDENCE	401	228	6	0	2	0	2	0	853	64	39	103	1	959	41	238
EOC	Y				PROVIDENCE	401	228	7	0	20	0	20	0	816	37	49	86	5	927	73	238
EOC	Y				PROVIDENCE	401	228	8	0	9	0	9	0	823	29	72	101	16	949	51	238
EOC	Y				PROVIDENCE	401	270	0	0	3	0	3	0	880	68	16	84	1	968	32	238
EOC	Y				PROVIDENCE	401	270	1	0	4	1	5	0	893	54	21	75	4	977	23	238
EOC	Y				PROVIDENCE	401	270	2	0	2	0	2	0	878	80	15	95	1	976	24	238
EOC	Y				PROVIDENCE	401	270	3	5	1	0	6	0	884	54	22	76	6	972	28	238
EOC	Y				PROVIDENCE	401	270	4	0	5	0	5	0	868	45	46	91	1	965	35	238
EOC	Y				PROVIDENCE	401	270	5	0	3	0	3	0	852	65	24	89	9	953	47	238
EOC	Y				PROVIDENCE	401	270	6	0	6	0	6	0	833	50	28	78	0	917	83	238
EOC	Y				PROVIDENCE	401	270	7	0	0	0	0	0	842	60	20	80	0	922	78	238
EOC	Y				PROVIDENCE	401	270	8	0	0	0	0	0	950	12	15	27	9	986	14	238
EOC	Y				PROVIDENCE	401	270	9	0	3	0	3	0	871	61	23	84	20	978	22	238

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EOC	Y				401	169	7	4	12	0	16	808	61	26	87	0	911	89	238
EOC	Y				401	383	0	0	1	0	1	884	57	16	73	1	959	41	238
EOC	Y				401	383	1	6	0	0	6	905	49	14	63	0	974	26	238
EOC	Y				401	383	2	18	21	0	39	845	50	44	94	0	978	22	238
EOC	Y				401	383	3	0	1	0	1	903	65	21	86	3	993	7	238
EOC	Y				401	383	4	0	1	0	1	948	31	18	49	2	1000	0	238
EOC	Y				401	383	5	0	2	0	2	929	39	25	64	2	997	3	238
EOC	Y				401	383	6	19	4	0	23	894	49	23	72	2	991	9	238
EOC	Y				401	383	7	3	1	0	4	925	53	16	69	0	998	2	238
EOC	Y				401	383	8	5	4	0	9	903	63	13	76	3	991	9	238
EOC	Y				401	383	9	9	1	0	10	921	43	17	60	3	994	6	238
EOC	Y				401	415	8	0	0	0	0	969	10	4	14	1	984	16	238
EOC	Y				401	432	6	0	1	0	1	820	67	15	82	14	917	83	238
EOC	Y				401	432	7	0	2	0	2	817	61	15	76	103	998	2	238
EOC	Y				401	437	6	0	1	0	1	831	67	22	89	1	922	78	238
EOC	Y				401	437	8	0	2	0	2	895	27	16	43	0	940	60	238
EOC	Y				401	490	0	0	1	0	1	838	64	25	89	8	936	64	238
EOC	Y				401	533	9	0	1	0	1	826	72	3	75	0	902	98	238
EOC	Y				401	572	3	0	0	0	0	757	44	138	182	0	939	61	238
EOC	Y				401	632	0	0	1	0	1	840	63	18	81	9	931	69	238
EOC	Y				401	632	4	0	1	0	1	850	35	29	64	0	915	85	238
EOC	Y				401	649	4	0	0	0	0	750	5	244	249	0	999	1	238
EOC	Y				401	654	4	0	0	0	0	940	30	9	39	2	981	19	238
EOC	Y				401	654	5	0	3	0	3	965	21	4	25	2	995	5	238
EOC	Y				401	654	6	0	0	0	0	942	22	7	29	3	974	26	238
EOC	Y				401	680	4	0	0	0	0	1000	0	0	0	0	1000	0	238
EOC	Y				401	680	5	0	0	0	0	997	0	0	0	0	997	3	238
EOC	Y				401	680	7	0	0	0	0	986	6	2	8	1	995	5	238
EOC	Y				401	680	8	0	0	0	0	1000	0	0	0	0	1000	0	238

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EOC	Y			PROVIDENCE	401	714	0	0	2	0	2	0	0	882	54	28	82	3	969	31	238
EOC	Y			PROVIDENCE	401	808	6	0	37	0	37	0	37	863	48	21	69	21	990	10	238
EOC	Y			PROVIDENCE	401	865	6	0	1	0	1	0	1	927	14	22	36	0	964	36	238
EOC	Y			PROVIDENCE	401	919	5	0	2	0	2	0	2	844	43	4	47	1	894	106	238
EOC	Y			SCITUATE	401	764	0	0	0	0	0	0	0	877	19	6	25	2	904	96	238
EOC	Y			SCITUATE	401	764	5	0	0	0	0	0	0	230	15	7	22	0	252	748	238
EOC	Y			TIVERTON	401	816	0	0	0	0	0	0	0	915	36	12	48	4	967	33	238
EOC	Y			TIVERTON	401	816	5	0	0	0	0	0	0	701	30	4	34	2	737	263	238
EOC	Y			W WARWICK	401	615	0	0	19	0	19	0	19	881	50	5	55	5	960	40	238
EOC	Y			W WARWICK	401	615	1	40	30	0	70	0	70	861	4	5	9	0	940	60	238
EOC	Y			W WARWICK	401	615	2	0	105	0	105	0	105	799	32	12	44	0	948	52	238
EOC	Y			W WARWICK	401	615	3	1	64	0	65	0	65	843	56	14	70	0	978	22	238
EOC	Y			W WARWICK	401	615	5	0	72	0	72	0	72	843	46	28	74	2	991	9	238
EOC	Y			W WARWICK	401	615	7	1	90	0	91	0	91	811	32	25	57	1	960	40	238
EOC	Y			W WARWICK	401	615	8	0	47	0	47	0	47	860	57	17	74	0	981	19	238
EOC	Y			W WARWICK	401	615	9	1	117	0	118	0	118	822	33	20	53	1	994	6	238
EOC	Y			W WARWICK	401	825	6	0	1	0	1	0	1	353	1	1	2	0	356	644	238
EOC	Y			W WARWICK	401	825	7	0	131	0	131	0	131	790	20	15	35	8	964	36	238
EOC	Y			WARREN	401	289	0	0	1	0	1	0	1	938	43	8	51	4	994	6	238
EOC	Y			WARREN	401	289	2	0	1	0	1	0	1	903	38	36	74	4	982	18	238
EOC	Y			WARREN	401	337	5	0	0	0	0	0	0	494	22	21	43	3	540	460	238
EOC	Y			WARWICK	401	681	4	0	0	0	0	0	0	873	23	41	64	0	937	63	238
EOC	Y			WARWICK	401	681	5	0	0	0	0	0	0	1000	0	0	0	0	1000	0	238
EOC	Y			WARWICK	401	691	2	0	0	0	0	0	0	1000	0	0	0	0	1000	0	238
EOC	Y			WARWICK	401	773	7	0	0	0	0	0	0	879	5	16	21	0	900	100	238
EOC	Y			WARWICK	401	921	0	0	0	0	0	0	0	920	29	12	41	0	961	39	238
EOC	Y			WARWICK	401	921	1	0	0	0	0	0	0	959	31	6	37	2	998	2	238
EOC	Y			WARWICK	401	921	2	0	0	0	0	0	0	931	25	44	69	0	1000	0	238
EOC	Y			WARWICK	401	921	3	0	0	0	0	0	0	967	17	13	30	2	999	1	238

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EOC	Y			401	WARWICK	401	921	4	0	0	0	0	0	0	0	948	21	17	38	3	989	11	238
EOC	Y			401	WARWICK	401	921	5	0	2	0	2	0	2	866	36	57	93	6	967	33	238	
EOC	Y			401	WARWICK	401	921	6	0	0	0	0	0	919	51	29	80	0	999	1	238		
EOC	Y			401	WARWICK	401	921	7	0	0	0	0	0	1000	0	0	0	0	1000	0	238		
EOC	Y			401	WARWICK	401	921	8	0	0	0	0	0	180	0	0	0	100	200	800	238		
EOC	Y			401	WESTERLY	401	315	0	0	0	0	0	0	926	54	8	62	4	992	8	238		
EOC	Y			401	WESTERLY	401	315	2	0	0	0	0	0	920	25	15	40	1	961	39	238		
EOC	Y			401	WESTERLY	401	315	5	0	0	0	0	0	944	38	12	50	1	995	5	238		
EOC	Y			401	WESTERLY	401	584	7	0	0	0	0	0	993	5	0	5	0	998	2	238		
EOC	Y			401	WESTERLY	401	637	4	0	0	0	0	0	839	18	10	28	1	868	132	238		
EOC	Y			401	WESTERLY	401	637	7	0	0	0	0	0	450	19	13	32	0	482	518	238		
EOC	Y			401	WLOCESATER	401	992	9	0	0	0	0	0	8	0	0	0	0	8	992	238		
EOC	Y			401	WOONSOCKET	401	356	0	0	0	0	0	0	822	55	5	60	1	883	117	238		
EOC	Y			401	WOONSOCKET	401	356	1	0	0	0	0	0	814	70	8	78	7	899	101	238		
EOC	Y			401	WOONSOCKET	401	356	4	0	0	0	0	0	811	72	8	80	0	891	109	238		
EOC	Y			401	WOONSOCKET	401	597	0	0	0	0	0	0	862	61	5	66	3	931	69	238		
EOC	Y			401	WOONSOCKET	401	597	5	0	0	0	0	0	785	37	18	55	0	840	160	238		
EOC	Y			401	WOONSOCKET	401	597	6	0	0	0	0	0	800	64	25	89	1	890	110	238		
EOC	Y			401	WOONSOCKET	401	768	3	0	0	0	0	0	321	3	8	11	0	332	668	238		