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VIA OVERNIGHT MAIL

October 28, 2013

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

RECEIVED
2013 OCT 29 AM 10: 24
PUBLIC UTILITIES COMMISSION

RE: Request for Waiver of NANPA's Denial of Request for a Block – Newport Rate Center

Dear Ms. Wilson-Frias:

Teleport Communications America, LLC – RI, an affiliate of AT&T Corp., (collectively referred to as AT&T/TCAL) was requested by NeuStar to assume code holder responsibility for abandoned code 401-399 in the Newport, Rhode Island rate center. After reviewing the code, blocks and ports on the code, it was determined that no other blocks were assigned to any other carrier except for the carrier abandoning the code and that AT&T/TCAL had the most ports on the code. Because AT&T/TCAL had an interest based on having ports on the code, AT&T/TCAL believed that it had an obligation to take the code holder responsibility from Global NAPs, the carrier abandoning the code. It is AT&T/TCAL's understanding that Global NAPs is abandoning ~600 codes nationwide.

Because AT&T/TCAL does not have a block currently assigned from 401-399, AT&T/TCAL applied for a block to accommodate milliwatt test requirements reflected on the A record in BIRRDS. Unfortunately but not unreasonably, NeuStar denied the request as AT&T/TCAL did not qualify for growth in the Newport rate center. After discussion with NeuStar, it was determined that pursuing the safety valve process, with the state of Rhode Island, was the only alternative to securing a block. Otherwise, AT&T/TCAL will have a stranded A record in BIRRDS.

On October 18, 2013, AT&T/TCAL submitted a Central Office Code (NXX) Assignment Request (Part 1A) to NeuStar, requesting a block, in 401-399, to meet the corporate need for a test number in a code for which AT&T/TCAL is now the code holder. The Company has an adequate supply of numbers for new customers but NOT a test number in the code we are

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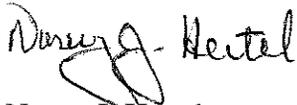
Page 2

assuming code holder responsibility for: 401-399. The Pooling Administration System (PAS) generated an error message on the grounds that AT&T/TCAL did NOT meet the rate center based months-to-exhaust (MTE) threshold of 6 months AND the utilization threshold of 75%. Our MTE is 261 months and utilization is 12.6%. 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/TCAL requests that the Rhode Island Public Utilities Commission ("Commission"), overturn NeuStar's decision and order that a block of numbers, in 401-399, be assigned to AT&T/TCAL in the Newport rate center, to serve as a test number. AT&T notes that when NeuStar denies the release of necessary numbers, a carrier may appeal to the Commission for relief. 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").

If you need additional information, please feel free to contact me.

Respectfully submitted,



Nancy J. Hertel

NJH/plj

Attachments

Part1A

NPA: 401 LATA: 130 OCN: ^{iv} 7125
7351Number of Thousands-Blocks Requested : 1Switching Identification(Switch Entity/POI) : ^vPRVDRIUFDS1

City or Wire Center Name : _____

Rate Center: ^{vi}PRVDRIUFDS1NEWPORTRate Center Sub Zone: NEWPORT**1.3 Dates:**Date of Application: ^{vii} _____
10/18/2013Requested Block Effective Date:
^{viii} 11/18/2013

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) _____
401-399-0
- 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.

Part 1A

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: **WE HAVE SUBMITTED TO BECOME THE CODE HOLDER FOR ABANDONED CODE 401-399 AND NEED TO PROCURE A BLOCK FOR TEST LINE ON THE A RECORD. WE DON'T QUALIFY FOR GROWTH AND PER GARY ZAHN THE ONLY WAY TO GET A BLOCK ASSIGNED IS TO DO A SAFETY VALVE.**

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**

= 10/18/2013

**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.

Part3

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPA3 Part 3

Tracking Number : 401-NEWPORT-RI-680275

Date of Application: 10/18/2013 Effective Date: _____
Date of Receipt: 10/18/2013 Date of Response: 10/18/2013

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - RI
(Telcordia™ LERG™ Routing Guide) OCN: 7351
Parent Company OCN: 7126

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 PRVDRIUFDS1
Rate Center: NEWPORT
Rate Center Sub Zone: NEWPORT

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

____ **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 TM 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.)