



**Cheryl Hamill**  
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November 28, 2017

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

RE: Teleport Communication America, LLC – RI's Request for Waiver of NANPA's Denial of Request for 10,000 Numbers to Serve the Centredale Rate Center

Dear Ms. Wilson-Frias:

The purpose of this letter is to seek a waiver of the NANPA's (i.e., NeuStar) decision to deny Teleport Communication America, LLC – RI's ( hereinafter AT&T's) request for 10,000 numbers to permit AT&T to provide service to Citizens Bank. Citizens Bank, the 12<sup>th</sup> largest bank in the United States offering financial services to over 5 million individuals, companies and institutions, is currently expanding its presence in Rhode Island.

On October 24, 2017, AT&T submitted a Central Office Code (NXX) Assignment Request (Part 1A) to NeuStar requesting a code to meet the customer's need. AT&T has an adequate supply of numbers (~855 across multiple blocks) but not a full code. The Pooling Administration System (PAS) generated an error message on the grounds that AT&T had NOT met both the 6 month rate center based months-to-exhaust (MTE) threshold AND the 75% utilization threshold. AT&T's MTE is 855 months and its utilization is 93.85%. The denial was based entirely upon AT&T not having met the MTE threshold. A copy of the denial is attached. 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, the carrier may appeal to the Commission for relief. Because Citizens Bank is anxious to receive these numbers, AT&T respectfully requests that the Commission address this waiver request as soon as possible.

AT&T respectfully requests that the Commission overturn NeuStar's decision and order that 10,000 numbers be assigned to AT&T in the Centredale rate center to serve Citizens Bank. 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,

A handwritten signature in blue ink that reads "Cheryl Hamill".

Cheryl Hamill

Central Office Code Assignment Guidelines (COAG)  
 Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking  
 Number: **401-CENTREDALE-RI-1042945**

**Full NXX: Dedicated  
 Customer**

Type of Application:  New  Change<sup>1</sup>  
 Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity  
 Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - RI**

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

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

Contact Name: **Tammy Bryant**

Contact  
 Address: **358 Old Main Street**

City: **Asbury** State: **NJ** ZIP: **08802**

Phone: **908-537-0179** Fax : **210-  
893-  
2281**

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

Code Administrator:<sup>2</sup>

Name: **Patricia Soderland**

Address: **21575 Ridgetop Circle**

City: **Sterling** State: **VA** ZIP: **20166**

Phone: **571-434-5348** Fax : **571-  
434-  
5502**

NXX:<sup>3</sup> LATA: **130**  
 1.2 NPA: **401** OCN:<sup>4</sup>**7351** Parent Company's  
 OCN(s) **7125**

Switching Identification (Switching Entity/POI)

<sup>5</sup>**PRVDRIWAVMD**

Locality/City/Wire Center:**PRVDRIWAVMD**

Rate  
Center:<sup>6</sup>**CENTREDALE**  
Tandem Homing  
Homing Tandem Operating Co.<sup>7</sup>:**VERIZON**      CLLI<sup>TM8</sup>:**PRVDRIWA06T**

1.3 Dates

Date of Application:**10/24/2017**

Requested Effective

Date:<sup>9,10</sup>

**12/29/2017**

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    Yes     No

Expedite Documentation must be provided if "Request Expedite" = Yes  
Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS,  
Other): **CAP OR CLEC**

b) Type of service (e.g., Cellular - Type 2): **Wireline**

c) Code Assignment Preference (Optional) \_\_\_\_\_

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

OCN-Intra-company<sup>11</sup>     Switching Id     Rate Center  
Tandem Homing CLLI

OCN-Inter-company<sup>12</sup>     Effective Date     LATA     Extend  
Reservations

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: <sup>13</sup>  Yes  No

1.6 NPA Jeopardy Criteria Apply:  Yes  No

1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:  
\_\_\_\_\_

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application<sup>14</sup>.

**Tammy Bryant**

Signature of Code Applicant

**Sr. Specialist - Network Support**

Title

**10/24/2017**

Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup>The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup>Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language®

Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</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, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup>Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup>Select if you are the current Code Holder

<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup>An incomplete form may result in delays in processing this request.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>  
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 401-CENTREDALE-RI-1042945

Date: Tuesday, October 24, 2017 OCN: 7351 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - RI

Rate Center: CENTREDALE

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: NPA NXX BLOCK ID 401 292 A 401 300 3 401 757 2 401 757 4 401 757 5

Name of Block Applicant: Tammy Bryant

Signature: Tammy Bryant

Title: Sr. Specialist - Network Support 893-2281

Phone: 908-537-0179-

Fax: 210-

E-Mail: tbryant@att.com

A. Available Numbers: 855

B. Assigned Numbers: 13139

C. Total Numbering Resources: 14000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: 0

List Excluded Code(s) or Block(s): 0

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

E. Growth History - Previous 6 months<sup>4</sup>

0    1    0    0    3    1

F. Forecast - Next 12 months<sup>5</sup>

1    1    1    1    1    1    1    1    1    1    1    1

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 1.0

H. Months to Exhaust<sup>6</sup>  
=

Numbers Available for Assignment to Customers (A)

Average Monthly Forecast (G)

Block Requested  
1

Available Numbers  
855

Months To Exhaust  
855.00

I. Utilization<sup>7</sup>  
=

Assigned Numbers (B)

X 100 = 93.85

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

Explanation: \_\_\_\_\_

<sup>1</sup>A 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.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>Quantity 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).

<sup>4</sup>Net 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.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4) (ii))

Thousands-Block Number Pooling Administration Guidelines  
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 401-  
CENTREDALE-RI-  
1042945

Date of Application: 10/24/2017 Effective Date: \_\_\_\_\_

Date of Receipt: 10/24/2017 Date of Response: 10/24/2017

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - RI

(LERG™ Routing Guide<sup>1</sup>) OCN: 7351

Parent Company OCN: 7125

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 (1-1000): \_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>: PRVDRIWAVMD  
 Rate Center: CENTREDALE

Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code 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 Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language<sup>®</sup> Location Code (CLLI<sup>™</sup> Code) of the switching entity/POI shown on the Part 1A form. Common Language<sup>®</sup> is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

11/16/2017

**Citizens Bank N.A.**  
**685 GREENVILLE AVE**  
**JOHNSTON, RI 02919**

AT&T TNAC,

This Letter of Intent represents a request by Citizens Bank N.A. for 10,000 *consecutive* Numbers for BVOIP Services. Citizens Bank N.A. intends to order service, in the CENTREDALE rate center, on the BVOIP Switch: CLMASCTLGT0(P) pending AT&T's successful completion of the required testing. Citizens Bank N.A. also intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

Citizens Bank had three acquisitions in different decades that helped shape the momentum of the Company prior to a period of rapid growth which began in 1988. As the 12th largest retail bank in the United States, we deliver a broad range of financial services to over five million individuals, companies, not for profits, and institutions.

Our plans for growth in our new Johnston, RI facility will include over 4,000 employees to support voice, wireless and fax services for more than 1,300 other locations including over 75 back office locations. We anticipate further growth in the Johnston campus facility.

Sincerely,



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Steve White