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T.R.A. DOCKET ROOM

December 20, 2007

VIA HAND DELIVERY

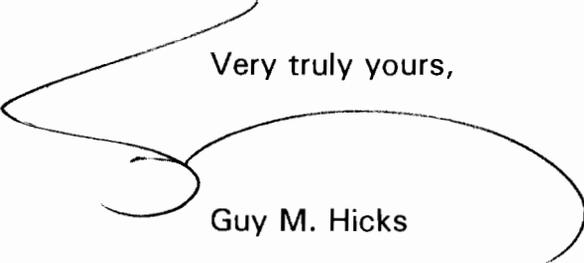
Hon. Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

RE: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Vanderbilt University*
Docket No 07-00275

Dear Chairman Kyle:

Enclosed are the original and four copies of AT&T Tennessee's *Petition for Expedited Review of Central Office Code Denial*. Copies of the enclosed are being provided to counsel for the Number Pooling Administrator.

Very truly yours,


Guy M. Hicks

GMH:ch

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to Vanderbilt University*

Docket No. _____

PETITION FOR EXPEDITED REVIEW OF CENTRAL OFFICE CODE DENIAL

AT&T Tennessee, pursuant to rules adopted by the FCC for challenging determinations of the Number Pooling Administrator ("NeuStar"), petitions the Tennessee Regulatory Authority (the "Authority") for an expedited review of NeuStar's denial of AT&T Tennessee's application for use of central office code numbering resources in the 615 area code.

AT&T Tennessee respectfully shows the Authority as follows:

1. AT&T Tennessee is a telecommunications public utility regulated by the Authority providing intraLATA, local exchange telecommunications services in the Nashville Rate Center.

2. NeuStar is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See C.F.R. § 52.13(a), (b).

3. On March 31, 2000, the Federal Communications Commission issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104" or the "March Order"). On

December 29, 2000, the FCC issued its 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. 99-200 ("FCC 00-429" or the "December Order"). These FCC orders addressed issues and strategies relating to the efficient use of numbering resources.

4. In FCC 00-104 and FCC 00-429, the FCC announced rules and sought comments in an effort to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to slow further exhaustion of existing numbers under the NANP.

5. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier's need for numbering resources by requiring carriers to report rate center based utilization data to NeuStar. The FCC further required that to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NeuStar to make code assignments, required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application in order for a code to be assigned.

6. This shift to a "rate center" basis for determining the need for new numbering resources was intended to "more accurately reflect how numbering resources are assigned" and to allow "carriers to obtain numbering resources in

response to specific customer demands." FCC Order ¶105. AT&T Tennessee has sought reconsideration of the above-described MTE rule before the FCC on two separate occasions. On December 28, 2001, the FCC entered an order retaining the rules requiring carriers to calculate MTE on a rate center basis rather than on a per-switch basis. *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, CC Docket Nos. 99-200, 96-98 and 95-116, *Third Report and Order and Second Order on Reconsideration* in CC Docket No. 99-200, FCC 01-362, Paragraph 48 (rel. Dec. 28, 2001).

7. On or about December 6, 2007, AT&T Tennessee submitted a Central Office Code (NXX) Assignment Request - Part 1, and the CO Code Assignment - Months to Exhaust Certification Worksheet, to NeuStar to be assigned a new code (NX5) necessary to meet the demands of its customer, Vanderbilt University ("Vanderbilt"). The request and worksheet are attached hereto as Exhibits "A" and "B" respectively.

8. The code assignment request was for a new code (NX5) in the 615 NPA area code, in response to Vanderbilt's request for 10,000 DID numbers in a new NXX (NX5). Vanderbilt cited high utilization of existing DID numbers as its basis for this request. However, AT&T Tennessee did not have sufficient number resources available within its inventory in the Nashville rate center, and, accordingly, AT&T Tennessee was unable to provide Vanderbilt with sufficient numbers to meet its needs. For this reason, AT&T Tennessee sought the numbering resources as noted above.

9. AT&T Tennessee completed the applications in accordance with NeuStar's Central Office Code (NXX) Assignment Guidelines and completed the necessary Months to Exhaust Certification Worksheet required by NeuStar.

10. At the time of the code request, the Nashville rate center had an MTE of approximately 60 months.

11. Despite the fact that AT&T Tennessee's Nashville rate center may not exhaust for 60 months, AT&T Tennessee is unable to provide the requested service through its switch that serves Vanderbilt within the Nashville rate center. This is because the individual switch that serves this customer within the Nashville rate center does not have sufficient number resources to meet the customer's request.

12. On or about December 6, 2007, NeuStar's Central Office Code Administration denied the code assignment request on the grounds that AT&T Tennessee had not met the rate center based months-to-exhaust criteria now set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that AT&T Tennessee does not have the numbering resources needed to satisfy its customers' demands in the switch at issue. That decision is attached hereto as Exhibit "C."

13. AT&T Tennessee's inability to provide this large business customer with the requested numbers prevents AT&T Tennessee from providing the quality of service this customer desires and expects. (Correspondence from Vanderbilt is attached as Exhibit "D").

14. Relief for the 615 NPA was implemented with the start of mandatory dialing on September 15, 1997. The Authority also ordered thousands-block

pooling for the 615 NPA with a Pool Start Date of March 14, 2002. According to NeuStar, based on the 2007 NRUF and NPA Exhaust Analysis dated October 31, 2006, the projected exhaust date of the 615 NPA is the First Quarter 2013. Therefore, granting AT&T Tennessee's request for numbering resources would not materially impact exhaustion of available numbers in the 615 NPA.

15. Both FCC 00-104 and NeuStar's Central Office Code (NXX) Guidelines provide that state regulatory authorities have the power and authority to review NeuStar's decision to deny a request for numbering resources. See FCC 00-104, Appendix A, Final Rules, § 52.15(g) (3) (iv) ("The carrier may challenge the NeuStar's decision to the appropriate state regulatory commission"); NeuStar Central Office Code (NXX) Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

16. The TRA has recognized its jurisdiction and authority to review NeuStar denials and to order the release of numbering resources to meet specific customer needs. The TRA has, for example, ordered NeuStar to provide AT&T Tennessee with numbering resources to meet the service requirements of the University of Tennessee, even though AT&T Tennessee had been unable to satisfy the required months-to-exhaust criteria. *Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to University of Tennessee - Chattanooga* (approved by the Directors on November 20, 2001 by a

vote of 3-0) (see correspondence from TRA Executive Secretary, dated November 29, 2001, attached as Exhibit "E").

17. In reviewing previous petitions of this type, the TRA Staff has requested that AT&T Tennessee provide additional information concerning number utilization for the specific central office involved in the request. This information for the Nashville, including the NSVLTNUNDSO Central Office is attached hereto as Exhibit "G."

18. The Authority, and not the FCC, is the most appropriate body to address this appeal. As noted above, the Authority has been granted jurisdiction to hear appeals from NeuStar's decisions regarding numbering resources. Any jurisdiction of the FCC to do the same is merely concurrent with the jurisdiction of the Authority. AT&T Tennessee believes that the Authority can more quickly address the numbering problem facing Vanderbilt and AT&T Tennessee, and, because time is of the essence to the customer, AT&T Tennessee believes it is appropriate to pursue this matter in the forum that can most quickly address the issue.

19. Under earlier months-to-exhaust procedures used by NeuStar, waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under existing procedures, NeuStar looks at the number of months-to-exhaust for the entire rate center without any exceptions. The current process for review is arbitrary and results in decisions contrary to the public interest and decisions that do not necessarily

preserve the efficient use of telephone numbers or postpone dates of exhaust. Moreover, the denial of sufficient numbering resources to AT&T Tennessee to meet Vanderbilt's request is inconsistent with the FCC's position that "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." FCC 00-429 at ¶ 61. By refusing to grant numbering resources sufficient to meet Vanderbilt's needs, the NeuStar is preventing Vanderbilt from obtaining the service of its choice from its carrier of choice, AT&T Tennessee.

20. Notwithstanding customer need for a specific numbering arrangement, AT&T Tennessee's analysis indicates that AT&T Tennessee will be unable to meet the six-months-to-exhaust threshold at the rate center level in time to obtain adequate numbering resources to serve this customer absent relief from the Authority. This situation will result in AT&T Tennessee's inability to respond to its customer's needs for specific numbering resources.

CONCLUSION

For the reasons articulated above, AT&T Tennessee respectfully urges the Authority to direct the NeuStar to provide the requested numbers to AT&T Tennessee to enable AT&T Tennessee to meet the specific requirements of Vanderbilt in order that Vanderbilt may receive the service of its choice from the provider of its choice to meet its telecommunications needs.

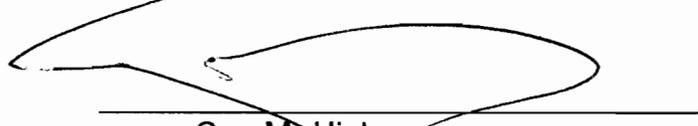
WHEREFORE, AT&T Tennessee requests:

1. The Authority review the decision of the NeuStar to deny AT&T Tennessee's request for additional numbering resources; and

2. The Authority direct the NeuStar to provide numbers to AT&T Tennessee to meet the specific requirements of Vanderbilt in the Nashville rate center within the 615 NPA.

Respectfully submitted,

AT&T TENNESSEE

A large, handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is somewhat stylized and loops around the line.

Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6311

Pooling Administration System

 loretta.archer@bridge.bellsouth.com (SP)

[Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level¹

Date **Thursday, December 6, 2007**

OCN **9419**

Company Name **BELLSOUTH SO CNTL**

Rate Center **NASHVILLE**

List all Codes NPA(s)-NXXs and Blocks
NPA(s)-NXX-X(s)

| | |
|---------|---|
| 615-207 | 0 |
| 615-214 | 0 |
| 615-214 | 1 |
| 615-214 | 2 |
| 615-214 | 3 |
| 615-214 | 4 |
| 615-214 | 5 |
| 615-214 | 6 |
| 615-214 | 7 |
| 615-214 | 8 |

Name of Block Applicant **Ms Loretta J Archer**

Title **Facility Specialist**

Telephone Number **(205) 968-8703**

Fax Number **(205) 977-3013**

E-Mail **loretta.archer@bellsouth.com**

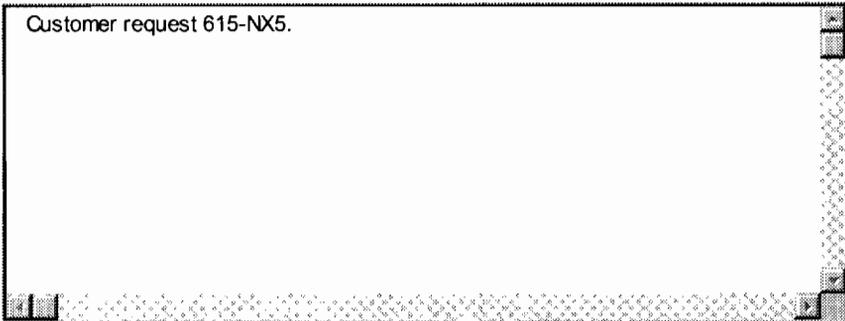
A. Available Numbers *

B. Assigned Numbers *

C. Total Numbering Resources *

D. Quantity of numbers activated in the
past 90 days and excluded from the
Utilization calculation *

List excluded Code(s) or Block(s)



E. Growth History - Previous 6 months² *

| | | | |
|---------|------|---------|-------|
| Month 1 | 3287 | Month 2 | 15652 |
| Month 3 | 598 | Month 4 | 3228 |
| Month 5 | 3502 | Month 6 | 2883 |

F. Forecast - Next 12 months³ *

| | | | |
|----------|------|----------|------|
| Month 1 | 4858 | Month 2 | 4858 |
| Month 3 | 4858 | Month 4 | 4858 |
| Month 5 | 4858 | Month 6 | 4858 |
| Month 7 | 4858 | Month 8 | 4858 |
| Month 9 | 4858 | Month 10 | 4858 |
| Month 11 | 4858 | Month 12 | 4858 |

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **4858.000**

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

| Block Requested | A. Available Numbers | H. Months to Exhaust |
|-----------------|----------------------|----------------------|
| 1 | 291427 | 59.989 |

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **71.281**

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.

²Net 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.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To 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, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

Pooling Administration System

 loretta.archer@bridge.bellsouth.com (SP)

[Sign Out](#)

Request Resources

| | |
|---------------------|--|
| State | <input type="text" value="TENNESSEE"/> |
| NPA | <input type="text" value="615"/> |
| Rate Center | <input type="text" value="NASHVILLE"/> |
| OCN | <input type="text" value="9419-BELLSOUTH SO CNTL"/> |
| Type of Application | <input type="text" value="Application for a full NXX for a Dedicated Customer"/> |

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

 loretta.archer@bridge.bellsouth.com (SP)

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Request Full NXX (Dedicated Customer)

Do you already have a block/code in this

rate center? Yes No

Will all blocks be activated on the same

switch? Yes No

Will there be multiple block effective dates

requested? Yes No

Pooling Administration System

 loretta.archer@bridge.bellsouth.com (SP)

[Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **71.281 percent**. The FCC requires a utilization of **75.000 percent**.

Select One Option and Submit

- Return to the Months To Exhaust Form
- Discard all the information provided for the request and start with a fresh Part 1A
- State Waiver Option

Submit

VANDERBILT UNIVERSITY



NASHVILLE, TENNESSEE 37203

Information Technology Services • 143 Hill Center/Peabody Box 34 • Direct phone (615) 322-2951 • fax (615) 343-1605

October 17, 2007

Glenn Kittle
AT&T
Floor 24, 333 Commerce St.
Nashville, TN 37201-3300

Dear Mr. Kittle:

Vanderbilt University would like to acquire an additional block of 10,000 DID numbers due to voice network growth. Currently, we have exceeded 80% utilization of our existing DID allotment. If possible, this block of DID numbers should be from the exchange of NX5-xxxx. If this is not possible, we can discuss alternatives. We have no other dialing restrictions.

We appreciate your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Mathews', written in a cursive style.

Dave Mathews
Director, Network Services
Peabody #34
230 Appleton Place
Nashville, TN 37203

TENNESSEE REGULATORY AUTHORITY



Sara Kyle, Chairman
Lynn Greer, Director
Malvin Malone, Director

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

November 29, 2001

Ms. Cheryl Dixon
Senior Code Administrator
1800 Sutter Street
Suite: 570
Concord, CA 94520

RE: Denial of BellSouth's Central Office Code ("NXX") Assignment Request.

Dear Ms. Dixon:

On November 1, 2001, BellSouth Petitioned the Tennessee Regulatory Authority ("TRA") for Expedited Review of Growth Code Denial by the North American Numbering Plan Administration ("NANPA"), Docket No. 01-00957. BellSouth specifically requested the overturn of NANPA's denial, and order the issue of one growth code ("NXX") for the Chattanooga rate center in the 423 NPA.

BellSouth stated they requested a growth code in the 423 NPA in response to a request received from a customer, the University of Tennessee, Chattanooga ("UTC"), as they did not have sufficient numbering resources available to meet the customer's needs. BellSouth's also stated that the Chattanooga Rate Center's Months to Exhaust ("MTE") calculation was 31.88 months.

The TRA Staff ("Staff") verified that the MTE requirement six months cannot be met. Staff also verified that the Chattanooga rate center is a multiple switch rate center, and that the MTE has to be calculated on a rate center level rather than at switch level. Staff is also satisfied with the validity of UTC's request. In that the 423 NPA has a projected exhaust date for the 4th Quarter of 2004, and the current demands in the 423 NPA is 2.5 NXXs per month, it is unlikely that the assignment of one (1) NXX will have a material effect on the projected exhaust of the 423 NPA.

On November 20, 2001, the Directors of the Tennessee Regulatory Authority approved BellSouth's petition, and ordered the NANPA to issue BellSouth one growth code in the 423 NPA. The TRA Order will be provided once it is administratively processed.

Sincerely,

A handwritten signature in black ink, appearing to read "K. David Waddell".

K. David Waddell
Executive Secretary

CC: Brent Struthers, NeuStar

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-8953
www.state.tn.us/trs

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-55, SUB 1268

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

**In the Matter of
Petition of BellSouth Telecommunications, Inc.,
for Review of NANPA Denial of Application
for Numbering Resources)**

**ORDER RULING ON THE
BELLSOUTH PETITION**

BY THE COMMISSION: On March 6, 2001, BellSouth Telecommunication, Inc. (BellSouth) requested that the Commission review the North American Numbering Plan Administrator's (NANPA) decision denying the reservation of two central office codes (NXXs) in the 910 and 836 Numbering Plan Areas (NPAs). Reservation of one NXX was requested for Guilford County Government and one NXX was requested for Corning, Inc., from NANPA.

NANPA, in reaching its decision to deny the numbering resources, stated that BellSouth's Month-to-Exhaust worksheet shows that BellSouth has more than a six month supply of numbering resources in the two central offices which would be providing services to these customers, respectively. However, BellSouth stated that it does not have in its inventory 10,000 sequential numbers (i.e., one NXX) in each NPA available to meet the service requirement for these two customers.

There were no comments filed on this matter before the Commission.

WHEREUPON, the Commission now reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that NeuStar, Inc., as NANPA, should provide BellSouth the numbering resources needed to meet the needs of Guilford County Government and Corning, Inc. The Commission notes that BellSouth, as a telecommunications service provider, should be allowed to meet its specific customer requirements. Furthermore, the reservations of numbering resources in this instance represent identifiable and known market requirements. The Commission also recognizes that NANPA in reaching its decision must recognize and use industry guidelines to ensure consistent decision-making among all industry participants.

IT IS, THEREFORE, ORDERED as follows:

1. That NANPA shall provide BellSouth the numbering resources it needs to meet the service requirements for Guilford County Government and Corning, Inc.

2. That the numbering resources assigned by BellSouth to Guilford County Government and Corning, Inc., shall be done in a sequential numbering manner to optimize these resources.

3. That these numbering resources shall be subject to reclamation if not used within the allowable reservation period according to industry guidelines.

ISSUED BY ORDER OF THE COMMISSION.

This the 10th day of April, 2001.

NORTH CAROLINA UTILITIES COMMISSION



Geneva S. Thigpen, Chief Clerk

| NASHVILLE EXCHANGE | | | | | |
|---------------------------|----------|--------------------------|-------------------------|-------------------------------|--------------------|
| NPA-NXX | X | Available Numbers | Assigned Numbers | Total Number Resources | Utilization |
| 615 | 207 | 999 | 1 | 1 | 100.000% |
| 615 | 214 | 1,645 | 4,665 | 9,978 | 46.753% |
| 615 | 221 | 1,641 | 6,255 | 8,632 | 72.463% |
| 615 | 222 | 0 | 9,861 | 10,000 | 98.610% |
| 615 | 226 | 2,068 | 6,101 | 9,366 | 65.140% |
| 615 | 227 | 3,376 | 5,284 | 9,444 | 55.951% |
| 615 | 228 | 2,791 | 5,701 | 9,428 | 60.469% |
| 615 | 231 | 162 | 7,650 | 7,858 | 97.353% |
| 615 | 232 | 2,970 | 6,170 | 8,587 | 71.853% |
| 615 | 234 | 1,996 | 4 | 4 | 100.000% |
| 615 | 238 | 1,997 | 3 | 3 | 100.000% |
| 615 | 242 | 3,220 | 5,577 | 9,571 | 58.270% |
| 615 | 244 | 3,534 | 4,820 | 9,478 | 50.855% |
| 615 | 248 | 2,708 | 5,201 | 8,522 | 61.030% |
| 615 | 250 | 2,977 | 22 | 23 | 95.652% |
| 615 | 251 | 1,859 | 5,471 | 8,020 | 68.217% |
| 615 | 252 | 585 | 8,834 | 9,724 | 90.847% |
| 615 | 253 | 813 | 9,155 | 9,994 | 91.605% |
| 615 | 254 | 3,990 | 4,770 | 9,473 | 50.354% |
| 615 | 255 | 3,772 | 5,082 | 9,541 | 53.265% |
| 615 | 256 | 3,889 | 4,827 | 9,427 | 51.204% |
| 615 | 258 | 5,574 | 744 | 4,438 | 16.764% |
| 615 | 259 | 2,732 | 5,835 | 9,067 | 64.354% |
| 615 | 262 | 2,212 | 6,007 | 9,274 | 64.772% |
| 615 | 263 | 3,938 | 62 | 109 | 56.881% |
| 615 | 269 | 2,503 | 5,122 | 8,129 | 63.009% |
| 615 | 271 | 610 | 8,906 | 9,750 | 91.344% |
| 615 | 275 | 3,184 | 753 | 3,109 | 24.220% |
| 615 | 279 | 2,624 | 4,824 | 7,749 | 62.253% |
| 615 | 284 | 0 | 9,999 | 9,999 | 100.000% |
| 615 | 291 | 1,468 | 8,081 | 9,906 | 81.577% |
| 615 | 292 | 3,399 | 5,121 | 8,908 | 57.488% |
| 615 | 296 | 996 | 4 | 4 | 100.000% |
| 615 | 297 | 3,410 | 5,218 | 9,004 | 57.952% |
| 615 | 298 | 1,369 | 7,230 | 9,067 | 79.740% |
| 615 | 299 | 2,582 | 4,643 | 7,630 | 60.852% |
| 615 | 301 | 2,981 | 19 | 19 | 100.000% |
| 615 | 309 | 1,432 | 6,397 | 8,132 | 78.665% |
| 615 | 312 | 4,755 | 245 | 245 | 100.000% |
| 615 | 313 | 680 | 8,277 | 9,821 | 84.279% |
| 615 | 315 | 1,498 | 5,120 | 6,885 | 74.365% |
| 615 | 316 | 2,158 | 6,327 | 8,612 | 73.467% |
| 615 | 317 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 320 | 4,395 | 3,840 | 8,697 | 44.153% |
| 615 | 321 | 3,356 | 5,143 | 8,944 | 57.502% |

| NASHVILLE EXCHANGE | | | | | |
|---------------------------|----------|--------------------------|-------------------------|-------------------------------|--------------------|
| NPA-NXX | X | Available Numbers | Assigned Numbers | Total Number Resources | Utilization |
| 615 | 322 | 318 | 9,522 | 9,896 | 96.221% |
| 615 | 324 | 970 | 30 | 30 | 100.000% |
| 615 | 327 | 2,883 | 5,002 | 8,400 | 59.548% |
| 615 | 329 | 2,293 | 5,942 | 8,923 | 66.592% |
| 615 | 331 | 2,856 | 5,627 | 9,258 | 60.780% |
| 615 | 332 | 3,817 | 3,477 | 5,643 | 61.616% |
| 615 | 333 | 2,836 | 5,405 | 8,944 | 60.432% |
| 615 | 335 | 294 | 700 | 1,000 | 70.000% |
| 615 | 340 | 1,823 | 5,081 | 7,438 | 68.311% |
| 615 | 341 | 2,192 | 6,392 | 8,634 | 74.033% |
| 615 | 342 | 1,130 | 8,831 | 8,977 | 98.374% |
| 615 | 343 | 0 | 9,997 | 9,997 | 100.000% |
| 615 | 344 | 0 | 9,999 | 9,999 | 100.000% |
| 615 | 345 | 2,975 | 14 | 14 | 100.000% |
| 615 | 346 | 1,993 | 7 | 7 | 100.000% |
| 615 | 350 | 5,318 | 3,872 | 9,399 | 41.196% |
| 615 | 352 | 2,492 | 6,095 | 9,368 | 65.062% |
| 615 | 353 | 3,029 | 5,581 | 9,072 | 61.519% |
| 615 | 354 | 2,295 | 3,032 | 5,701 | 53.184% |
| 615 | 356 | 2,998 | 5,775 | 9,440 | 61.176% |
| 615 | 360 | 1,990 | 6,213 | 8,813 | 70.498% |
| 615 | 361 | 2,754 | 5,760 | 9,170 | 62.814% |
| 615 | 365 | 3,599 | 5,516 | 9,405 | 58.650% |
| 615 | 366 | 2,670 | 5,300 | 8,464 | 62.618% |
| 615 | 367 | 3,069 | 5,253 | 8,811 | 59.619% |
| 615 | 369 | 3,889 | 111 | 111 | 100.000% |
| 615 | 370 | 1,561 | 6,419 | 8,825 | 72.737% |
| 615 | 371 | 1,547 | 6,707 | 8,688 | 77.198% |
| 615 | 372 | 1,340 | 5,121 | 7,365 | 69.532% |
| 615 | 373 | 1,080 | 6,596 | 8,481 | 77.774% |
| 615 | 376 | 1,525 | 6,336 | 8,188 | 77.382% |
| 615 | 377 | 1,261 | 5,562 | 7,504 | 74.120% |
| 615 | 383 | 3,043 | 4,995 | 8,659 | 57.686% |
| 615 | 385 | 2,668 | 5,884 | 9,005 | 65.341% |
| 615 | 386 | 1,609 | 6,391 | 8,209 | 77.854% |
| 615 | 391 | 1,378 | 6,040 | 7,749 | 77.946% |
| 615 | 399 | 4,168 | 4,234 | 9,057 | 46.748% |
| 615 | 401 | 588 | 6,635 | 7,906 | 83.924% |
| 615 | 416 | 1,160 | 2,600 | 3,100 | 83.871% |
| 615 | 421 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 432 | 1,901 | 4,999 | 7,900 | 63.278% |
| 615 | 445 | 2,273 | 4,063 | 5,683 | 71.494% |
| 615 | 457 | 8,200 | 1,800 | 10,000 | 18.000% |
| 615 | 458 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 460 | 1,024 | 8,062 | 9,273 | 86.941% |

| NASHVILLE EXCHANGE | | | | | |
|--------------------|-----|-------------------|------------------|------------------------|-------------|
| NPA-NXX | X | Available Numbers | Assigned Numbers | Total Number Resources | Utilization |
| 615 | 463 | 2,614 | 5,794 | 8,769 | 66.074% |
| 615 | 467 | 3,938 | 57 | 59 | 96.610% |
| 615 | 507 | 1,197 | 4,118 | 4,501 | 91.491% |
| 615 | 514 | 999 | 1 | 1 | 100.000% |
| 615 | 524 | 2,450 | 5,050 | 6,550 | 77.099% |
| 615 | 532 | 2,529 | 7,447 | 9,997 | 74.492% |
| 615 | 565 | 1,779 | 221 | 221 | 100.000% |
| 615 | 574 | 1,898 | 101 | 1,001 | 10.090% |
| 615 | 612 | 4,009 | 3,133 | 6,778 | 46.223% |
| 615 | 613 | 999 | 1 | 1 | 100.000% |
| 615 | 620 | 999 | 1 | 1 | 100.000% |
| 615 | 627 | 4,992 | 6 | 8 | 75.000% |
| 615 | 646 | 1,521 | 7,268 | 9,436 | 77.024% |
| 615 | 650 | 5,546 | 2,650 | 8,503 | 31.165% |
| 615 | 660 | 6,286 | 700 | 6,986 | 10.020% |
| 615 | 661 | 1,464 | 5,825 | 9,032 | 64.493% |
| 615 | 662 | 2,429 | 6,101 | 9,234 | 66.071% |
| 615 | 664 | 590 | 9,087 | 9,979 | 91.061% |
| 615 | 665 | 3,294 | 4,565 | 8,151 | 56.005% |
| 615 | 673 | 3,257 | 3,960 | 7,610 | 52.037% |
| 615 | 687 | 240 | 7,546 | 9,810 | 76.922% |
| 615 | 695 | 4,869 | 131 | 131 | 100.000% |
| 615 | 717 | 5,035 | 1,570 | 6,876 | 22.833% |
| 615 | 720 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 724 | 999 | 1 | 1 | 100.000% |
| 615 | 725 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 726 | 3,181 | 6,066 | 9,769 | 62.094% |
| 615 | 727 | 2,994 | 6 | 6 | 100.000% |
| 615 | 731 | 4,882 | 3,711 | 9,413 | 39.424% |
| 615 | 733 | 1,704 | 7,823 | 9,912 | 78.925% |
| 615 | 734 | 765 | 7,921 | 8,915 | 88.850% |
| 615 | 736 | 1,522 | 7,252 | 9,172 | 79.067% |
| 615 | 737 | 9,919 | 50 | 9,999 | 0.500% |
| 615 | 738 | 0 | 4,000 | 4,000 | 100.000% |
| 615 | 741 | 3,593 | 6,375 | 9,986 | 63.839% |
| 615 | 742 | 2,243 | 6,364 | 9,029 | 70.484% |
| 615 | 743 | 247 | 8,428 | 8,686 | 97.030% |
| 615 | 744 | 709 | 8,017 | 9,749 | 82.234% |
| 615 | 747 | 686 | 7,293 | 8,161 | 89.364% |
| 615 | 748 | 959 | 8,104 | 9,438 | 85.866% |
| 615 | 749 | 55 | 8,911 | 8,980 | 99.232% |
| 615 | 760 | 963 | 17 | 37 | 45.946% |
| 615 | 762 | 0 | 9,999 | 9,999 | 100.000% |
| 615 | 769 | 2,000 | 8,000 | 10,000 | 80.000% |
| 615 | 770 | 1,546 | 7,752 | 9,572 | 80.986% |

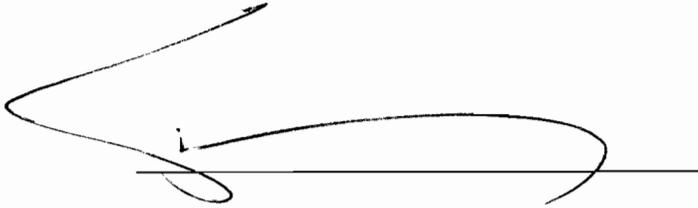
| NASHVILLE EXCHANGE | | | | | |
|---------------------------|----------|--------------------------|-------------------------|-------------------------------|--------------------|
| NPA-NXX | X | Available Numbers | Assigned Numbers | Total Number Resources | Utilization |
| 615 | 777 | 3,992 | 3 | 5 | 60.000% |
| 615 | 780 | 786 | 8,513 | 9,589 | 88.779% |
| 615 | 781 | 2,512 | 5,822 | 8,854 | 65.756% |
| 615 | 782 | 1,006 | 8,026 | 9,140 | 87.812% |
| 615 | 783 | 661 | 8,612 | 9,405 | 91.568% |
| 615 | 795 | 1 | 9,999 | 10,000 | 99.990% |
| 615 | 831 | 2,774 | 6,297 | 9,489 | 66.361% |
| 615 | 832 | 3,131 | 5,509 | 9,310 | 59.173% |
| 615 | 833 | 3,685 | 5,001 | 9,205 | 54.329% |
| 615 | 834 | 3,375 | 5,334 | 9,268 | 57.553% |
| 615 | 835 | 170 | 9,682 | 9,876 | 98.036% |
| 615 | 837 | 2,928 | 5,803 | 9,415 | 61.636% |
| 615 | 843 | 4,976 | 21 | 23 | 91.304% |
| 615 | 844 | 3,985 | 15 | 28 | 53.571% |
| 615 | 846 | 6,971 | 26 | 30 | 86.667% |
| 615 | 860 | 2,752 | 4,824 | 8,389 | 57.504% |
| 615 | 862 | 770 | 9,060 | 9,999 | 90.609% |
| 615 | 865 | 2,330 | 6,149 | 9,385 | 65.519% |
| 615 | 868 | 2,763 | 5,479 | 9,164 | 59.788% |
| 615 | 870 | 2,558 | 861 | 3,879 | 22.196% |
| 615 | 871 | 1,038 | 6,771 | 8,122 | 83.366% |
| 615 | 872 | 1,548 | 6,381 | 8,478 | 75.265% |
| 615 | 874 | 2,796 | 5,542 | 8,697 | 63.723% |
| 615 | 876 | 1,325 | 7,218 | 9,569 | 75.431% |
| 615 | 880 | 1,383 | 7,039 | 8,660 | 81.282% |
| 615 | 882 | 1,181 | 6,475 | 7,871 | 82.264% |
| 615 | 883 | 2,229 | 6,034 | 9,044 | 66.718% |
| 615 | 884 | 2,754 | 4,373 | 7,421 | 58.927% |
| 615 | 885 | 3,308 | 4,883 | 8,792 | 55.539% |
| 615 | 886 | 1,202 | 3,117 | 3,523 | 88.476% |
| 615 | 889 | 2,436 | 5,679 | 8,825 | 64.351% |
| 615 | 902 | 1,301 | 7,759 | 9,230 | 84.063% |
| 615 | 936 | 0 | 10,000 | 10,000 | 100.000% |
| 615 | 937 | 0 | 9,996 | 9,996 | 100.000% |
| 615 | 963 | 575 | 8,242 | 8,908 | 92.524% |
| 615 | 974 | 999 | 1 | 1 | 100.000% |
| 615 | 986 | 4,693 | 305 | 306 | 99.673% |
| | | 384,452 | 880,623 | 1,235,433 | 71.281% |

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2007, a copy of the foregoing document was served on the parties of record, via the method indicated:

- Hand
- U.S. Mail
- Facsimile
- Overnight Mail
- Electronic Mail

Ms. Cheryl Dixon
Senior Code Administrator
Number Pooling Administrator
1800 Sutter Street, Suite 570
Concord, California 94520

A handwritten signature in black ink, consisting of a large, sweeping loop that starts from the left, goes up and over, then comes down and under a horizontal line, ending with a small flourish.