



49 Ballston Avenue
Ballston Spa, NY 12020

David Hayes
Manager
State Regulatory Affairs
(518) 704-2066
david.w.hayes@verizon.com

September 28, 2022

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

Re: Request for Waiver of NANPA's Denial of Verizon Rhode Island's Request for 400 Numbers to Serve Johnston Customer

Dear Ms. Massaro:

The purpose of this letter is to seek a waiver of NANPA's (i.e., Somos) decision to deny MCImetro Access Transmission Services LLC, DBA Verizon Access Transmission Services ("Verizon") request for 44 numbers to permit Verizon to offer service to Encompass Health ("Customer"). In submitting this waiver request to the Rhode Island Public Utilities Commission ("Commission"), Verizon notes that when Somos denies the release of a necessary block of 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 practicable.

I. NATURE OF NUMBERING REQUEST

Encompass Health, located in 2113 Hartford Av, Johnston, RI requested 400 telephone numbers specifically in the Providence CO in order to provide integrated dialing at an existing facility to support the growth of the organization. As such, Encompass Health is in need of 400 consecutive numbers. Verizon currently does not have 400 consecutive numbers in its inventory for the Providence exchange.

On September 21, 2022, Verizon submitted a Central Office Code (NXX) Assignment Request (a "Part 1A" form) to Somos, requesting the specific blocks to meet Encompass Health's needs.

The Company explained that it did not have the needed numbers available in its existing inventory in the Scituate rate center. On September 21, 2022, Somos Central Office Code Administrator denied the Company's request on the grounds that Verizon had not met the rate center-based months to exhaust ("MTE") criteria, as set forth by the FCC. This denial was based entirely upon not meeting the MTE requirements -- notwithstanding the fact that Verizon does not have the specific numbering resources needed to satisfy this specific customer's request.

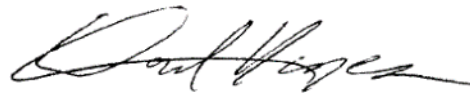
II. REQUEST FOR WAIVER OF NANPA'S NXX CODE DENIAL

By way of this letter, Verizon requests that the Commission overturn Somos's decision and order that 400 consecutive telephone numbers be assigned to Verizon Providence central office to permit Verizon to serve Encompass Health. 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 on Reconsideration (FCC 01-362), released December 28, 2001, in CC Docket No. 96-98 and CC Docket No. 99-200 ("Third NRO Order").

Because Verizon meets the standards set forth in the Commission's past decisions, Verizon respectfully requests this waiver from the Pooling Administrator's denial of Verizon Request for Number Block Release. Granting this waiver will result in the release of 400 numbers for immediate use so that the Company can serve Encompass Health.

Thank you for your assistance in this matter. Please contact me at 518-704-2066 if you have any questions concerning this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Hayes", written in a cursive style.

David Hayes



9001 Liberty Parkway
Birmingham, AL 35242

205.967.7116
encompasshealth.com

Diana A Cudia
Monday, September 19, 2022
Supervisor | Order Management Center
Verizon Business Group
O 877-288-0636 ext. 717-1108

Diana,
Encompass Health is adding DID service to the hospital phones system. Encompass requires 400 consecutive DID numbers in a square block. Example XXX-XXX-XX00/XX99 The first digit of the last four digits cannot start with a 9 or a zero. Four-digit PBX extensions cannot start with 9 or 0.

Site Address:
EH 03026200 Johnston RI
2113 Hartford Ave
Johnston RI 02919
RATE CENTER: SCITUATE

Jonathan Collins and I are the contact points for this request within Encompass Health Telecommunications.

LCON 1:
Christopher Vaughan, RCDD
Systems Engineer III
(800)981-2503 Office Toll Free
(205)970-3406 Office
(205)229-3381 Cell
Encompass Health Information Technology Group
Christopher.Vaughan@encompasshealth.com

LCON 2
Jonathan Collins
Systems Engineer II
(205)970-4450 Office
(205)623-9618 Cell
Encompass Health Information Technology Group
Jonathn.Collins@EncompassHealth.Com

Sincerely,

Christopher H. Vaughan

Tracking Number: **401-SCITUATE-RI-1726777**Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019**Individual Block
Request**Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC - RI**

Headquarters Address: **One Verizon Way**

City: **Basking Ridge** State: **NJ** ZIP: **07920**

Contact Name: **Katherine Rafalski**

Contact Address: **900 Chelmsford Road**

City: **Lowell** State: **MA** ZIP: **01851**

Phone: **978-322-2153** Fax: **978-323-4849**

E-mail: **katherine.rafalski@one.verizon.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Patricia Soderland**

Contact Address: **Two Tower Center Boulevard, 20th Floor**

City: **East Brunswick** State: **NJ** ZIP: **08816**

Phone: **571-363-3828** Fax: **571-363-3838**

E-mail: **psoderland@nanpa.com**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____NPA: **401** LATA: **130** OCN^{iv}: **7231** Parent Company's OCN **7229**Number of Thousands-Blocks Requested : **1**Switch Identification (Switching Entity/POI^v): **PRVDRICEDS0**

Rate Center^{vi}: SCITUATE

1.3 Dates:

Date of Application^{vii}:
09/21/2022

Requested Effective Date^{viii}:
10/22/2022

Requested Expedited Treatment? (See Section 8.6) Yes No

Expedited Explanation:

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- Primary Type of Service Blocks to be used for : Wireline
- Thousands-Block(s) (NXX-X) assignment preference (Optional) 401-587-3
- Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any The first digit of the last four digits cannot start with a zero or nine.
- 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 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 :

- Is this block Contaminated: Yes _____ No _____
- If Yes how many TNs are NOT available for assignment : _____
- 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 a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>Katherine Rafalski</u>	<u>Code Administrator</u>	<u>09/21/2022</u>
Signature of Block Applicant	Title	Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) 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 (PA) section also requires the SP to fill in the PA’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) completes the application should be entered in this section, as well as the Effective Date of the requested Thousands-Block.

Section 1.4 Service Providers (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs may indicate their preference for a particular Thousands-Block, e.g., 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are for additional Thousands-Blocks in a Rate Center in which the Applicant already has Numbering Resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are

returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, the request for return shall be denied.

The Thousands-Block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii}Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 401-SCITUATE-RI-1726777

Date of Application: 09/21/2022 Effective Date: _____

Date of Receipt: 09/21/2022 Date of Response: 09/21/2022

Service Provider Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC - RI

(LERGTM Routing Guide¹) OCN: 7231

Parent Company OCN: 7229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Patricia Soderland Phone: 571-363-3828

Signature of Pooling Administrator

Patricia Soderland Fax: 571-363-3838

Name (print)

Email: psoderland@nanpa.com

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)²: PRVDRICEDS0

Rate Center: SCITUATE

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 3A denial. If you are in

disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **401-SCITUATE-RI-1726777**

Date: **Wednesday, September 21, 2022**

OCN: **7231**

Company Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC - RI**

Rate Center: **SCITUATE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **401-227-9,**

Name of Block Applicant: **Katherine Rafalski**

Signature: **Katherine Rafalski**

Title: **Code Administrator**

Phone: **978-322-2153-**

Fax: **978-323-4849**

E-Mail: **katherine.rafalski@one.verizon.com**

A. Available Numbers³: **274**

B. Assigned Numbers: **619**

C. Total Numbering Resources⁴: **1000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: **0**

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

	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 months ⁶	<u>-12</u>	<u>3</u>	<u>-4</u>	<u>7</u>	<u>-3</u>	<u>-12</u>
--	-------------------	-----------------	------------------	-----------------	------------------	-------------------

F. Forecast - **405** **0** **0** **0** **0** **0** **0** **0** **0** **0** **0**
 Next 12
 months⁷

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: **67.5**

H. Months to Exhaust⁹ = $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	274	4.059

I. Utilization¹⁰ = $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \mathbf{61.9}$

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

²List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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).

⁶Net change in Telephone Numbers (TN) 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.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

NPANXX	K	BLOCK_EXCLN_RSN	REMARKS	INST	UNAV	%CONT	TRSP	EXCL	OTSP	PO	RC_ST	RC	CLLI	SITE/WC ST	SITE/WC	BH_OCN
401227	9			1,000	724	72.4	283	0	0	59	RI	SCITUATE	PRVDRICEDSO	RI	AF	7231