



**Carla Mascaro**  
AVP Senior Legal Counsel

**AT&T Services, Inc.**  
1425 Highway 206  
Bedminster, NJ 07921

**T 908.635.4943**  
**Cm2643@att.com**  
**att.com**

June 6, 2025

Cynthia Wilson-Frias, Esquire  
Chief of Legal Services  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Teleport Communications America, LLC— Request for Waiver of NANPA’s Denial of Request for 1,500 Numbers to Serve the Greenwich Rate Center**

Dear Ms. Wilson-Frias:

Teleport Communications America, LLC (hereinafter “TCAL”) respectfully requests that the Rhode Island Public Utilities Commission (“Commission”) grant a waiver of NANPA’s decision denying its request for 1,500 contiguous telephone numbers, which are necessary to provide service to the Rhode Island Army National Guard (hereinafter “the Rhode Island Army National Guard” or “the Customer”).

The Rhode Island Army National Guard is requesting that 1,500 contiguous telephone numbers be allocated to TCAL within the GREENWICH Rate Center to meet its growing operational needs. The requested telephone numbers will support a range of mission-critical functions including voice conferencing, video communication, and call center operations. The Rhode Island Army National Guard directly supports the Department of Defense, and the requested numbers are essential to fulfilling its service requirements. To meet a contractually required customer request date, the Rhode Island Army National Guard hopes to activate the numbering block on or before June 30, 2025.

The Rhode Island Army National Guard is specifically requesting that the telephone numbers be assigned within the 401 NPA, ending with XXX-6 or XXX-7, to facilitate migration to its new platform while ensuring uninterrupted operations.<sup>1</sup>

On May 14, 2025, TCAL submitted a Central Office Code (NXX) Assignment Request (Part 1) to NANPA requesting a numbering block to meet the Customer’s needs.<sup>2</sup> TCAL has an adequate supply of numbers but not of the format requested: 401-XXX-6 and 401-XXX-7. The Pooling Administration System (PAS) generated an error message on the grounds that TCAL did not meet the rate center-based months-to-exhaust (MTE) threshold of 6 months and the utilization

---

<sup>1</sup> A copy of the confidential customer letter of intent is attached as Confidential Attachment A. TCAL requests the Commission treat Attachment A as confidential.

<sup>2</sup> A copy of the Part 1 and MTE worksheets are attached as Confidential Attachments B and C. respectively. TCAL requests the Commission treat Attachments B and C as confidential.

threshold of 75%. TCAL's MTE is 5 months and its utilization is 30%. The denial was based entirely on TCAL not having met the MTE and utilization thresholds. A copy of the denial is attached.<sup>3</sup>

TCAL respectfully requests the Commission overturn NANPA's decision and order that 1,500 contiguous telephone numbers be assigned in the Greenwich rate center to serve the Customer. The Commission has the authority to take such action pursuant to the Federal Communication Commission's ("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 black ink that reads "Carla Mascaro". The script is cursive and fluid.

*Carla Mascaro*

Attachments

---

<sup>3</sup> A copy of the Part 3 denial is attached as Confidential Attachment D. TCAL requests the Commission treat Attachment D as confidential.