



Cheryl Hamill
AVP-Senior Legal Counsel

AT&T Services, Inc.
225 W. Randolph St. – Ste. 25A
Chicago, IL 60606
Phone: (312) 727-2424
Fax: (281) 664-9916
Email: chamill@att.com

May 18, 2018

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

RE: Request for Waiver of NANPA's Denial of Request for 2000 Numbers in the Westerly Rate Center

Dear Ms. Wilson-Frias:

The purpose of this letter is to seek a waiver of NANPA's (i.e., NeuStar) decision to deny AT&T's request for 2000 numbers to permit AT&T to provide service to Yale New Haven Health. 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, a carrier may appeal to the Commission for relief. Because the customer is anxious to receive these numbers, AT&T respectfully requests that the Commission address this waiver request as soon as possible.

Yale New Haven Health recently acquired the Westerly facility at 25 Wells Street from L&M Healthcare. They are implementing the AT&T IPFlex technology.

On April 27, 2018, AT&T submitted a Central Office Code (NXX) Assignment Request (Part 1A) to NeuStar, requesting 2 blocks to meet the Customer's needs. The Company has an adequate supply of numbers, but they are not in blocks 1 and 4. The Pooling Administration System (PAS) generated an error message on the grounds of our NOT meeting the rate center based months-to-exhaust (MTE) threshold of 6 months AND the utilization threshold of 75%. AT&T's MTE is 7.8 months and utilization is 49.3%. The denial was based upon AT&T not meeting both thresholds. A copy of the denial is attached.

By way of this letter, AT&T requests that the Commission overturn NeuStar's decision and order that 2000 numbers be assigned to AT&T in the Westerly rate center to serve Yale New Haven 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 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 "Cheryl Hamill".

Cheryl Hamill

Tracking Number: **401-WESTERLY-RI-1090274**Thousands-Block Application Form - Part 1A
Revised: January 4, 2016**Individual Block
Request**Type of Application: New Changeⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - RI**Headquarters Address: **One AT&T Way**City: **Bedminster** State: **NJ** ZIP: **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**Pooling Administrator:ⁱⁱContact Name: **John Auerbach**Contact Address: **1800 Sutter St. Ste. 780**City: **Concord** State: **CA** ZIP: **94520**Phone: **925-363-8706** Fax: **925-363-7684**E-mail: **john.auerbach@neustar.biz**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 401 LATA: 130 OCN^{iv}: 7351 Parent Company's OCN
7125

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI^v):
PRVDRIWAVMD

Rate Center^{vi}: WESTERLY

1.3 Dates:

Date of Application^{vii}: 04/27/2018 Requested Effective Date^{viii}:
05/29/2018

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

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 :

- 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) _____
401-656-1,4 MUST HAVE A 1 & 4 BLOCK
 d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any 0,2,3,5-9
 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.

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:

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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Tammy Bryant

Sr. Specialist - Network Support

04/27/2018

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 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.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider 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 (iconectivTM) LERGTM Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider 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 iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider 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 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. Service Providers 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 indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth 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 must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new 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 is available to assist in completing these forms.

ⁱⁱⁱA CO Code application will also need to be submitted to the PA.

^{iv}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 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 switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the switch /POL.

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

^{vii}Acknowledgment and indication of disposition of this application will 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 NPA-NXX of the LRN to be associated with this block (s) is/will be active in the PSTN prior to the effective date of the block(s).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Common Language[®] and Telcordia[®] are registered trademarks and CLI[™], LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 401-WESTERLY-RI-1090274

Date: Friday, April 27, 2018 OCN: 7351

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - RI

Rate Center: WESTERLY

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 401-388-A,9

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: 501

B. Assigned Numbers: 493

C. Total Numbering Resources: 1000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation³: 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 months⁴ 0 50 0 4 0 0

F. Forecast - Next 12 months⁵ 1109 9 9 9 9 9 9 9 9 9 9

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 192.333

H. Months to Exhaust⁶ = $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	501	2.605
2	1501	7.804

I. Utilization⁷ = $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{49.3}$

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.

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

³Quantity 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).

⁴Net 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.

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

⁶To 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)).

⁷Newly 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-WESTERLY-RI-1090274

Date of Application: 04/27/2018 Effective Date: _____

Date of Receipt: 04/27/2018 Date of Response: 04/27/2018

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - RI

(LERGTM Routing Guide¹) 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)²: PRVDRIWAVMD

Rate Center:

WESTERLY

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.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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

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

April 27, 2018

Yale New Haven Health
25 Wells St
Westerly, RI 02891

AT&T TNAC.

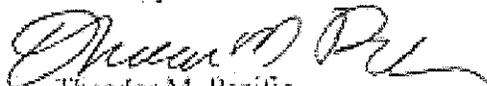
This Letter of Intent represents a request by Yale New Haven Health for 1,100 Numbers for BVoIP Service. Yale New Haven Health intends to order service, in the Westerly rate center, on the PRVDRIWAVMD switch pending AT&T's successful completion of the required testing. Yale New Haven Health intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

Yale New Haven Health currently has an existing network configuration and therefore technical requirements exist in the following blocks:

- Block 0 (0000-0999): _____
- Block 1 (1000-1999): 1300 - 1399
- Block 2 (2000-2999): _____
- Block 3 (3000-3999): _____
- Block 4 (4000-4999): 4000 - 4999
- Block 5 (5000-5999): _____
- Block 6 (6000-6999): _____
- Block 7 (7000-7999): _____
- Block 8 (8000-8999): _____
- Block 9 (9000-9999): _____

Acquired new hospital and require new numbers for expansion of IPFLEX technology

Sincerely,



Theodor M. Pacific
Lead Telecom Analyst
Yale New Haven Health Systems
Office: (203)688-7708
Email: ted.pacific@ynhh.org