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20150310150014
Filed Date: 03/10/2015
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March 10, 2015

Neysa Thomas
Acting Secretary
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: KCC Docket No. 15-SWBT-402-MIS

Dear Ms. Thomas:

Attached you will find *Southwestern Bell Telephone Company's Petition for Expedited Review of Numbering Resource Denial* for filing in a new docket.

Sincerely,

Bruce A. Ney
General Attorney

Attachment
cc: Andrew French, Litigation Counsel

(SLSH, Kansas City Rate Center)

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of a Petition for Commission)	
Review of a NANPA or PA Decision to)	
Withhold Growth Numbering Resources)	
Following the Expedited Review Process)	Docket No. 15-SWBT-____-MIS
for the Assignment of Numbering)	
Resources in the Kansas City Rate Center.)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S PETITION FOR
EXPEDITED REVIEW OF NUMBERING RESOURCE DENIAL**

COMES NOW Southwestern Bell Telephone Company, d/b/a AT&T Kansas ("SWBT"), pursuant to the Expedited Review Process established by the Commission's Order No.5 in Docket No.01-GIMT-552-GIT,¹ and petitions the Commission to review and reverse the decision of the Thousands-Block Number Pooling Administrator ("PA") denying SWBT the availability of certain numbering resources in the Kansas City rate center. In support of its petition, SWBT shows the Commission as follows:

1. SWBT is an electing carrier providing intrastate local exchange services within the state of Kansas.

2. Saint Luke's South Hospital ("SLSH") in Overland Park, Kansas is a SWBT customer operating out of the Kansas City rate center. SLSH is expanding their voice network for new medical group offices in Overland Park, Kansas. SLSH is requesting 600 sequential DID numbers for this facility which is part of a larger voice

¹ Order No. 5, In the Matter of a General Investigation into Number Conservation Measures, Docket No. 01-GIMT-552-GIT, dated Sept. 13, 2002.

network that utilizes approximately 14,000 DID numbers from locations across the Kansas City metropolitan area. In order for SLSH to maintain their dialing plan, they would like the numbers from an NXX ending in 6 and from either blocks 5, 6, or 9. At this time, the Number Pooling inventory is not showing any blocks available for assignment from an NXX ending in 6. NANPA will need to open a new code.

3. On March 5, 2015, SWBT, on behalf of SLSH, requested one 1,000 block of DID numbers from the PA. (A copy of the customer's request is attached hereto as "Attachment 1" and is made a part hereof by this reference; SWBT's application is attached hereto as "Attachment 2" and is made a part hereof by this reference.) SLSH states that it needs the additional numbers urgently as phone number shortage affects patient care.

4. SWBT's request was subsequently denied by the PA because the request did not meet the FCC established requirements for additional resources. (A copy of the PA's denial is attached hereto as "Attachment 3" and is made a part hereof by this reference.) Specifically, the FCC requires the months-to-exhaust to be six months or fewer and inventory utilization to be at least 75 percent. At the time of the denial of its request, SWBT's months-to-exhaust was 795.299 months and utilization was at 56.47%, neither of which satisfies the FCC's requirements.

5. SLSH will not be returning any existing numbers.

6. SWBT respectfully requests the Commission give this Petition expedited consideration.

WHEREFORE, SWBT respectfully requests an Order of the Commission granting its Petition and overturning the PA's denial of its numbering request so that SWBT can meet the important needs of SLISH.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bruce A. Ney", is written over a horizontal line.

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Attorney for
Southwestern Bell Telephone Company
d/b/a AT&T Kansas

ATTACHMENT 1

To: AT&T
From: Olga Gencheva
CC: Demetria White-Gaulden
Date: February 27, 2015
Re: Safety Valve Request

The Saint Luke's South Hospital in Overland Park, KS is in need of expanding its voice network for new medical group offices. This facility is also part of a larger voice network that utilizes approximately 14,000 DID numbers from different Central Office locations across the greater Kansas City metro area.

SLHS has requested AT&T for additional 600 DID numbers and was provided with the list of non consecutive numbers in three different prefixes. SLHS cannot utilize provided numbers as they are in conflict with SLHS dialing plan therefore, specific DNs are being requested in order to fit into this large dialing plan.

The additional DID numbers are needed urgently as phone number shortage affects patient care.

Please treat this letter as a Safety Valve Request for 600 consecutive DID numbers in following ranges :

913-XXX-4500 through 913-XXX-6999 (64500 - 66999)
913-XXX-7200 through 913-XXX-7299 (67200 - 67299)
913-XXX-9100 through 913-XXX-9999 (69100 - 69999)

Please advise when these number ranges are available.

Olga Gencheva 02-27-2015

Olga Gencheva
Network Engineer II
Information Services
Saint Luke's Health System
800 NW Chipman Road, Suite 5950
Lee's Summit, MO 64063

Phone (816) 251-9922
E-mail ogencheva@saint-lukes.org

ATTACHMENT 2

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Type of Application (check one): ☒ New ☐ Change¹ ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: AT&T CORPORATION
Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583
Contact Name: ESTHER LIU
Contact Address: 2600 CAMINO RAMON, 2S750MM City SAN RAMON State CA Zip 94583
Phone: 925-543-1203 Fax: 925-355-9268
E-Mail: el1683@att.com

Pooling Administratorⁱⁱ:

Contact

Name: kevin Gatchell

Contact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520

Phone: 925 363 7653 Fax: 925-363-7686

E-Mail: kevin.gatchell@neustar.biz

1.2 General Information

Check one: No LRN needed ☒ X LRN neededⁱⁱⁱ ☐

NPA: 913 LATA: 524 OCN^{iv}: 9533 Parent Company's OCN 9533

Number of Thousands-Blocks Requested: 1

Switch Identification (Switching Entity/POI)^v: KSCYKSCBDS0 City or Wire Center Name _____

Rate Center^{vi}: KANSASCITY Rate Center Sub Zone: _____

1.3 Dates

Date of 03/05/2015 Requested Block Effective Date^{vii}: _____

Request Expedited Treatment? (See Section 8.6) Yes ☒ X No ☐

1.4 Type of Service Provider Requesting the Thousands-Block:

a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for: WIRELINE

c) Thousands-Block(s) (NXX-X) 913-NX6-5,6,9

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if

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) _____

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

**Thousands-Block Application Form
Part 1A**

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

Change block: Yes____, If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect block: Yes____, If Yes, list NPA-NXX-X _____

1.6 Block Return

- a) Is this block Contaminated: Yes____ or 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____ or No____
d) Has this block been protected from further assignment: Yes____ or No____

Remarks: SAFETY VALVE WAIVER REQUEST – SAINT LUKE'S HEALTH SYSTEM

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.

ESTHER LIU
Signature of Block Applicant

CODE ADMINISTRATOR
Title

03/05/2015
Date

Thousands-Block Application Form

Part 1A

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™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{viii}. 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, inter-exchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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 shall 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 unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA must 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.

**Thousands-Block Application Form
Part 1A**

Foot Notes:

-
- ⁱ Identify type of and reason for change(s) in Section 1.5.
 - ⁱⁱ The Pool Administrator is available to assist in completing these forms.
 - ⁱⁱⁱ A 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).
 - ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
 - ^{vi} Rate Center name must be a tariffed Rate Center.
 - ^{vii} 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).
 - ^{viii} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3 - Modified August 6, 2001

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1 (Thousands-Block Number Pooling Growth Block Request)

Date 03/05/2015 OCN: 9533 Company Name: SOUTHWESTERN BELL
Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (71); NPA/NXX-X (315)

Name of Block Applicant: ESTHER LIU Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-543-1203 FAX No.: 925-355-9268

E-Mail: el1683@att.com

A. Available numbers: 379093

B. Assigned numbers: 561190

C. Total Numbering Resources: 993791

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 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
	<u>-956</u>	<u>-1378</u>	<u>-2355</u>	<u>-1072</u>	<u>-594</u>	<u>-1020</u>						
E. Growth History – Previous 6 months ²	<u>0</u>	<u>592</u>	<u>1000</u>	<u>636</u>	<u>0</u>	<u>632</u>	<u>175</u>	<u>-852</u>	<u>-205</u>	<u>-61</u>	<u>-2040</u>	<u>-660</u>

F. Forecast – Next 12 months³

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 476.667

H. Months to Exhaust⁴
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{795.299}$$

I. Utilization⁵
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = \underline{56.470\%}$$

¹ 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.

² 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.

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

⁴ To 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)).

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

ATTACHMENT 3

Pooling Administration System

Dated 05 March 2015

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 913-KANSASCITY-
KS-812262

Date of Application: 03/05/2015 Effective Date: _____

Date of Receipt: 03/05/2015 Date of Response: 03/05/2015

Service Provider Name: SOUTHWESTERN BELL

(iconectiv™ LERG™
Routing Guide) OCN: 9533

Parent Company OCN: 9533

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-7652

Signature of Pooling Administrator

Genevieve Bettiga Fax: 925-363-7683

Name (print)

Email: genevieve.bettiga@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 :

Switch Identification(Switch Entity/POI): ¹

KSCYKSCBDS0

Rate Center:

KANSASCITY

X Form Complete, request denied.

Explanation:

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.

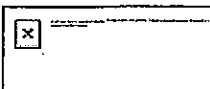
Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

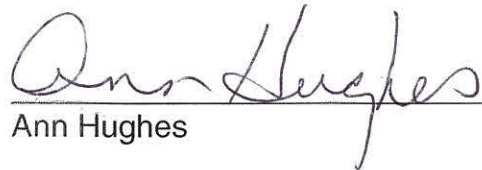
¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)



VERIFICATION

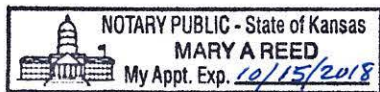
STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

I, Ann Hughes, of lawful age, and being first duly sworn, now state: I am Director-External Affairs, and have read Southwestern Bell Telephone Company's Petition for Expedited Review of Numbering Resource Denial, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.



Ann Hughes

Subscribed and sworn to before me this 10th day of March, 2015.





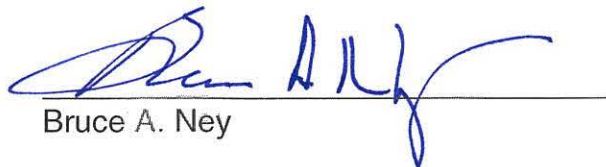
Notary Public

My appointment expires: October 15, 2018

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of Southwestern Bell Telephone Company's Petition for Expedited Review of Numbering Resource Denial was sent via U.S. Mail or hand-delivered on this 10th day of March, 2015 to:

Andrew French
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027



Bruce A. Ney