



Bruce A. Ney  
General Attorney

20150309160915  
Filed Date: 03/09/2015  
State Corporation Commission  
of Kansas  
AT&T Kansas  
220 SE Sixth Street  
Room 515  
Topeka, Kansas 66603-3596

T: 785.276.8413  
F: 785.276.1948  
bruce.ney@att.com

March 9, 2015

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

Re: KCC Docket No. 15-TCAT- 395 -MIS

Dear Ms. Thomas:

Attached you will find *Teleport Communications America, LLC'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

**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-TCAT-____-MIS
for the Assignment of Numbering	)	
Resources in the Manhattan, Kansas Rate	)	
Center.	)	

**TELEPORT COMMUNICATIONS AMERICA, LLC's PETITION FOR  
EXPEDITED REVIEW OF NUMBERING RESOURCE DENIAL**

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

1. TCA is a certificated, competitive local exchange carrier ("CLEC") providing local exchange services within the state of Kansas.
  
2. Kansas Secured Title is a TCA customer operating out of the Manhattan, Kansas rate center. Kansas Secured Title is a title company providing title and escrow

---

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

services to the area around Manhattan, Kansas for real estate transactions. Kansas Secured Title is completing a statewide network and phone system that requires consecutive numbers to complete installation and interaction with its existing network configuration and numbering scheme. Accordingly, Kansas Secured Title is requesting 20 consecutive numbers of the format: 785-XXX-28XX. (A copy of the customer's request is attached hereto as "Attachment 1" and is made a part hereof by this reference.)

3. On February 25, 2015, TCA, on behalf of Kansas Secured Title, requested one 1,000 block of DID numbers from the PA. (A copy of TCA's application is attached hereto as "Attachment 2" and is made a part hereof by this reference.)

4. TCA'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 made a part hereof by this reference.) Specifically, the FCC requires the months-to-exhaust to be six (6) months or fewer and inventory utilization to be at least 75 percent. At the time of the denial of its request, TCA's months-to-exhaust was .292 months and utilization was at 46.5%.

5. Kansas Secured Title will not be returning any existing numbers.

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

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

Respectfully submitted,



BRUCE A. NEY (KS#15554)  
220 E. Sixth Street, Room 515  
Topeka, Kansas 66603-3596  
(785) 276-8413  
(785) 276-1948 (facsimile)  
[bruce.ney@att.com](mailto:bruce.ney@att.com)

Attorney for  
Teleport Communications America, LLC  
d/b/a AT&T

# **ATTACHMENT 1**



SERVICE BEYOND  
EXPECTATION

## KANSAS SECURED TITLE MANHATTAN LLC

February 19, 2015

**KS Secured Title**  
303 S Seth Childs Road  
Manhattan, KS 66502

303 S. SETH CHILDS ROAD  
MANHATTAN, KS 66502

(785) 537-1677  
FAX (785) 537-1696

AT&T TNAC,

This Letter of Intent represents a request by KS Secured Title for 20 numbers for BVOIP service. KS Secure Title intends to order service, in the Manhattan rate center, on the KSCYMO09Gtl switch pending AT&T's successful completion of the required testing. KS Secure Title intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

KS Secure Title currently has an existing network configuration and therefore technical requirements request numbers from the following block.

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

Kansas Secured Title is a Title Insurance Company providing title and escrow services to the area around Manhattan Kansas for real estate transactions.

KS Secure Title has contracted for a complete statewide network and phone system with AT&T. We need consecutive numbers to complete the installation and comply with our numbering scheme. We will continue to add sites to the network as contracts come due.

Sincerely,

  
**Keith A. Love, Controller**

# **ATTACHMENT 2**

## TBPAG Attachment 1 - January 12, 2015

## Thousands-Block Application Form - Part 1A

Tracking Number: 785-MANHATTAN-  
KS-810240  
Individual Block  
Request

Type of Application:      New                      Change      Disconnect

GENERAL APPLICATION INFORMATION

## 1.1 Contact Information:

Block Applicant:

Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - KS

Headquarters Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07920

Contact Name: Luke Riga

Contact Address: One AT&T Way

City, State, Zip: Bedminster, NJ, 07920

Phone: 908-234-6795      Fax: 908-234-8044      E-mail: lriga@att.com

Pooling Administrator: <sup>ii</sup>

Contact Name: Genevieve Bettiga

Contact Address: 1800 Sutter St

City, State, Zip: Concord, CA, 94520

Phone: 925-363-7652      Fax: 925-363-7683

E-mail: genevieve.bettiga@neustar.biz

## 1.2 General Information:



Check one : No LRN needed \_\_\_\_\_ LRN needed <sup>iii</sup> \_\_\_\_\_

NPA: 785 LATA: 534 OCN: <sup>iv</sup> 8995 Parent Company's  
OCN 7125

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI) : <sup>v</sup>  
SALNKSQAFMD

Rate Center: <sup>vi</sup> MANHATTAN

### 1.3 Dates:

Date of Application: <sup>vii</sup> 02/25/2015 Requested Block Effective  
Date: <sup>viii</sup> 03/28/2015

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.

Request Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No X

### 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) 785-473-2
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_
- 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<sup>ix</sup>    Switching Id    Part 1B

OCN: Inter-company<sup>x</sup>    Effective Date

Change 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 \_\_\_\_\_

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 (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Luke Riga**

Signature of Block Applicant

**Manager**

Title

**02/25/2015**

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.

Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 785-MANHATTAN-KS-810240Date: Wednesday,  
February 25, 2015OCN: 8995Company Name: TELEPORT COMMUNICATIONS  
AMERICA, LLC - KSRate Center: MANHATTANList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 785-370-7Name of Block Applicant: Luke Riga Signature: Luke RigaTitle: ManagerTelephone No.: 908-234-6795-FAX No.: 908-234-8044E-Mail: lriga@att.comA. Available Numbers: 9B. Assigned Numbers: 465C. Total Numbering Resources: 1000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>3</sup>: 0

List

Excluded

Code(s) or

Block(s):

Month Month Month Month Month Month Month Month Month Month Month Month

	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12
E. Growth History - Previous 6 months <sup>4</sup>	<u>4</u>	<u>2</u>	<u>3</u>	<u>200</u>	<u>307</u>	<u>73</u>						
F. Forecast - Next 12 months <sup>5</sup>	<u>20</u>	<u>32</u>	<u>19</u>	<u>35</u>	<u>38</u>	<u>41</u>	<u>40</u>	<u>43</u>	<u>46</u>	<u>46</u>	<u>32</u>	<u>11</u>

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 30.833

H. Months to Exhaust<sup>6</sup> = 
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<b>9</b>	<b>0.292</b>

I. Utilization<sup>7</sup> = 
$$\frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{46.5}$$

Explanation: \_\_\_\_\_

<sup>1</sup>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.

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

<sup>3</sup>Quantity 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

# **ATTACHMENT 3**

January 12, 2015  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : **785-MANHATTAN-  
KS-810240**

Date of Application: **02/25/2015** Effective Date: \_\_\_\_\_  
Date of Receipt: **02/25/2015** Date of Response: **02/25/2015**

Service Provider Name: **TELEPORT COMMUNICATIONS AMERICA, LLC - KS**

(iconectiv <sup>TM</sup> LERG <sup>TM</sup>  
Routing Guide ) OCN: **8995**

Parent Company OCN: **7125**

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): <sup>1</sup>

SALNKSQAFMD

Rate Center:

MANHATTAN

☒ Form Complete, request denied.

Explanation:

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 the administrator.

Explanation:

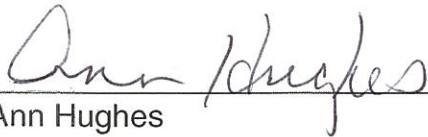
Remarks:

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> 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)

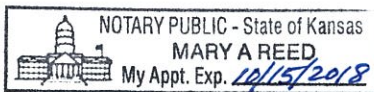
**VERIFICATION**


STATE OF KANSAS       )  
                                  ) SS:  
COUNTY OF SHAWNEE )

I, Ann Hughes, of lawful age, and being first duly sworn, now state: I am Manager – Regulatory Analysis, and have read Teleport Communications America, LLC'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 9th day of March, 2015.



  
Notary Public

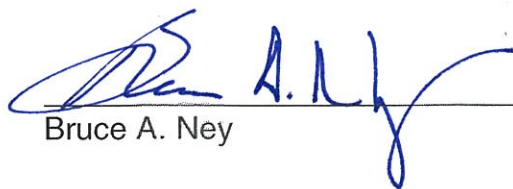
My appointment expires: October 15, 2018



## **CERTIFICATE OF SERVICE**

I hereby certify that a correct copy of Teleport Communication America, LLC's for Expedited Review of Numbering Resource Denial was sent via electronic mail on this 9th day of March, 2015 to:

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



---

Bruce A. Ney