

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

In the Matter of an Application)		
For Expedited Commission Review)		
of a NANPA or PA Decision to Deny)	Docket No.	20-COXT-069-MIS
Growth Numbering Resources in)		
The Salina Rate Center.)		

**APPLICATION OF COX KANSAS TELECOM FOR EXPEDITED REVIEW
OF NUMBERING RESOURCE DENIAL**

COMES NOW Cox Kansas Telecom ("Cox"), pursuant to the Expedited Review Process established by the Commission's Order No. 5 in Docket No.01-GIMT-552-GIT, and petitions the Commission to review and reverse the decision of the Thousands-Block Number Pooling Administrator ("PA") denying Cox the availability of certain numbering resources in the Salina, Kansas rate center. In support of its petition, Cox shows the Commission as follows:

1. Cox is an electing carrier providing intrastate local exchange service within the state of Kansas.
2. The Salina Regional Health Center ("Salina Regional"), in Salina, Kansas, is a Cox customer operating out of the Salina, Kansas rate center. To meet the growing needs of Salina Regional and ancillary facilities surrounding its location at 400 South Sante Fe, Salina, Kansas, Salina Regional is requesting additional numbers with a single common prefix. Salina Regional's current range of DID's does not have the capacity to fulfill Salina Regional's projected growth needs over the next 12 months. Per Salina Regional's growth plans, which anticipate rapid additions of

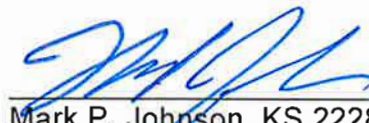
new facilities and a new in-house communications system, a large block of new numbers will be needed in the coming months. Due to the numbering to be used in the new system, the NPA-NXX must be 785-xx8.

3. Salina Regional is requesting a 10,000 contiguous block of DID numbers from a 785-xx8-0000 to 785-xx8-9999 block range. NANPA will need to open a new NXX code for Cox to obtain the necessary blocks. Salina Regional has requested the numbers be available and operational as soon as is possible, thus the request for expedited consideration.
4. On June 16, 2016, Cox, on behalf of Salina Regional, requested 10 blocks (10,000 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; Cox's original application is attached hereto as "Attachment 2" and is made a part hereof by this reference.)
5. Cox's request was subsequently denied by the PA because the request did not meet either of the two 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 PA stated that the application did not meet "the MTE and/or Utilization requirements," for the following reason: on the basis of the application, the PA concluded that Salina Regional would not exhaust already-assigned numbers within twelve months..
6. Salina Regional will not be returning any existing numbers.
7. Cox respectfully requests the Commission give this Petition expedited consideration, given Salina Regional's stated need for additional numbers as

part of its effort to provide expanded services to its patients, staff, and physicians.

WHEREFORE, Cox respectfully requests an Order of the Commission granting its Petition and overturning the PA's denial of Cox's numbering request so that Cox can meet the important needs of Salina Regional Health Center.

Respectfully submitted,



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VERIFICATION

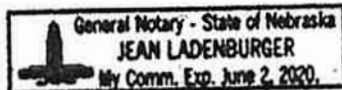
I, Bob Logsdon, of lawful age, and being first duly sworn, now state: I hold the position of Director, Regulatory Affairs, and have read Cox's Petition for Expedited Review of Numbering Resource Denial, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.

Bob Logsdon

Subscribed and sworn to before me on this 5 day of August, 2019.

Jean Ladenburger
Notary public

My commission expires:



CERTIFICATE OF SERVICE

I hereby certify that a correct copy of Cox Kansas Telecom's Application for Expedited Review of Numbering Resource Denial was sent via electronic mail on this 7th day of August, 2019 to:

Amber Smith
Chief Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027



Mark P. Johnson

ATTACHMENT 1



400 S. Santa Fe | P.O. Box 5080
Salina, Kansas 67402-5080
785.452.7000 | www.srhc.com

A healthcare organization of

To whom it may concern,

Salina Regional Health Center is growing, in order to support this growth in the future I would like to formally request a 10,000 block of sequential DID's that align with our dial plan for the city of Salina in the state of Kansas. These numbers will be used to support future growth and our upcoming in house clinical communication system. These numbers will also be used for our upcoming telepresence conference system. The DIDs need to align to a prefix that ends with 8 ie. 785-xx8-xxxx.

Thank you

A handwritten signature in cursive script that reads 'Paul Trickey'.

Paul Trickey

Director, Telecommunications

Salina Regional Health Center

ATTACHMENT 2

TN ADMINISTRATION

Block Request ID 17632

OCN	1802
NPA	785
NPA Relief	
LATA	534
Parent Company OCN	1802
Quantity of Blocks Requested	10
If requesting more than one block, Do you want multiple effective dates?	NO
If requesting more than one block, Do you want multiple switches?	NO
Rate Center	SALINA
Rate Center Sub Zone	
Switch Identification	SALNKSTA0MD
City or Wire Center Name	
Date of Application	2019-07-19 15:26:55.0
Request Expedited Treatment	NO
Requested Effective Date	08-19-2019

Type of Service Provider Requesting the Thousands-Block	
Type of SP	CLEC
Primary type of Service Blocks to be used for	WIRELINE
Thousands-Block(s) (NPA-NXX-X) Assignment preference	
Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any	
Type of Request	
Remarks	

Months to Exhaust and Utilization Certification Worksheet	
Codes List NPA(s)-NXX-X(s)	785.404.1, 785.404.2, 785.404.3, 785.404.4, 785.404.6, 785.515.5,
Available Numbers	1509
Assigned Numbers	4084
Total Numbering Resources	6000
Quantity Activated in last 90 days	0
List Excluded Code(s) or Block(s)	

Growth History - Previous 6 Months

Month 1 - 0	Month 2 - 0	Month 3 - 0
Month 4 - 0	Month 5 - 0	Month 6 - 0

Forecast - Next 12 Months			
Month 1 - 10000	Month 2 - 0	Month 3 - 0	Month 4 - 0
Month 5 - 0	Month 6 - 0	Month 7 - 0	Month 8 - 0
Month 9 - 0	Month 10 - 0	Month 11 - 0	Month 12 - 0

Months to Exhaust and Utilization	
Average Monthly Forecast	1667
Months to Exhaust	0.91
Utilization Percentage	68.07 %

Part 1B	
Will Block be activated by NPAC ?	NO
Service Provider NPAC SOA SPID	7661
LRN	7854046111
Remarks	

ATTACHMENT 3

From: NOC TN Admin <NOC.TN@cox.com>
Sent: Friday, July 19, 2019 3:34 PM
To: mrsjones830@gmail.com
Subject: FW: [EXTERNAL] , 785-SALINA-KS-1169965 - DENIED PAS - Part 3 Confirmation

From: mharrell-simington@somos.com <mharrell-simington@somos.com>
Sent: Friday, July 19, 2019 3:32 PM
To: NOC TN Admin <NOC.TN@cox.com>
Cc: PA_Part3@somos.com
Subject: [EXTERNAL] , 785-SALINA-KS-1169965 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 19 July 2019

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 785-SALINA-KS-1169965

Date of Application: 07/19/2019 Effective Date: _____
Date of Receipt: 07/19/2019 Date of Response: 07/19/2019

Service Provider Name: COX KANSAS TELCOM, LLC-KS
(LERG™ Routing Guide¹) 1802
OCN: _____
Parent Company OCN: 7987

NPAC SOA SPID : _____

Pooling Administrator Contact Information:
Margaret Harrell-Simington Phone: 925-420-0346
Signature of Pooling Administrator
Margaret Harrell-Simington Fax: 925-420-0377
Name (print)

Email:

mharrell-
simington@somos.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:

SALNKSTA0MD

Rate Center:

SALINA

☒ Form complete, request denied.

Explanation:

DR-57: 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 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 (CLL[™] Code) of the switching entity/POI shown on the Part 1A form. Common Language[®] is a registered

trademark and CLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.