BEFORE THE PUBLIC SERVICE COMMISSION
OF DELAWARE

IN THE MATTER TELEPORT COMMUNICATIONS	)	**PSC DOCKET**
AMERICA, LLC TO OBTAIN NUMBERING TO OBTAIN	)	**14 -** 0493
RESOURCES IN THE HOLLY OAK RATE CENTER	)	
FILED OCTOBER 30, 2014	)	

VERIFIED APPLICATION OF TELEPORT COMMUNICATIONS AMERICA, LLC FOR 2 BLOCKS OF TELEPHONE NUMBERS USING THE FCC SAFETY VALVE PROCESS

PROPRIETARY VERSION

This Verified Application is being filed on behalf of Teleport Communications America, LLC. by:

Wendie C. Stabler
Saul Ewing LLP
P. O. Box 1266
222 Delaware Avenue
Wilmington, DE 19899
(302) 421-6865
(302) 421-5868 (fax)
wstabler@saul.com

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2014 OCT 30 PM 1 22
DELAWARE P.S.C.

Dated: October 30, 2014

BEFORE THE PUBLIC SERVICE COMMISSION
OF DELAWARE

IN THE MATTER TELEPORT COMMUNICATIONS	)	**PSC DOCKET**
AMERICA, LLC TO OBTAIN NUMBERING TO OBTAIN	)	**14 - _____**
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VERIFIED APPLICATION OF
TELEPORT COMMUNICATIONS AMERICA, LLC
FOR 2 BLOCKS OF TELEPHONE NUMBERS
USING THE FCC SAFETY VALVE PROCESS

1. Teleport Communications America, LLC (Teleport) respectfully petitions the Delaware Public Service Commission ("Commission") to grant its application of the safety valve for NXX-X acquisition. By this letter, Teleport requests that the Commission grant the request for additional numbering resources initially denied by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA"), and that the Commission authorize the PA to release 2 blocks of numbers to Teleport so that we may serve our customer. The customer is a technology company that has an immediate need for the numbers to support disaster recovery and business continuity operations.

2. This request is based on the Federal Communications Commission ("FCC") Rules found at 47 C.F.R. 52.15(g)(3)(iv) and pursuant to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines and the Central Office Code (NXX) Assignment Guidelines published by the Industry Numbering Committee ("INC").[1]

3. A Delaware customer has requested that Teleport provide 1300 numbers for its business in the Holly Oak rate center.[2] AT&T has developed a communications plan that the customer will implement, and consequently, the customer will activate the 1300 numbers as soon as they are available.

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[1] These guidelines may be found on the INC web site: http://www.atis.org/inc/docs.asp
[2] See attached customer letter. Pursuant to Administrative Rule 11 and 29 Del. C. §10002(d), this letter is considered Proprietary and not subject to public disclosure. A redacted/public version is being filed simultaneously herewith.

4. The New Castle rate center in the 302 area code began number pooling on May 16, 2002. Consequently, normal numbering resource acquisition by a number pooling carrier, such as Teleport, is via an interface with the PA. The number pool for the Holly Oak rate center has 12 pristine blocks and 9 partially contaminated blocks available.[3]

5. On October 10, 2014 AT&T submitted a "Thousand Block Application Form Part 1A", and a "Months to Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the PA for 2 blocks[4] in the Holly Oak rate center. During the session with the Pooling Administration System ("PAS"), we received an error message indicating that the request would not process through the system without a state waiver.[5] The PA applies the FCC rules and INC Guidelines. These rules and guidelines require that a block holder requesting growth resources demonstrate that existing resources within the rate center will both exhaust within 6 months AND meet the 75% utilization level. The error message included calculations showing the utilization threshold was NOT met.

6. Although Teleport has an adequate supply of numbers to satisfy incremental requests without receiving a new block of numbers, Teleport's existing telephone resources cannot satisfy the need for 1300 numbers.

7. Teleport respectfully requests that the Commission grant the request for numbering resources and authorize the PA to issue the number block in the interest of our customer, as we are unable to satisfy the numbering needs of this customer without such an exception. Any correspondence with the PA in this matter may be brought to the attention of the Pooling Administrator responsible for the geographic area in question:

Ms. Agnes Rom
Pooling Administrator
NeuStar, Inc.
1800 Sutter Street, Room 780
Concord, CA 94520
925-363-7650

---

[3] See the Pooling Administration System Block Report:
http://nationalpooling.org/pas/control/reportselectpoolstep1?siteTyp=FR
[4] See attached Part 1A and MTE worksheet.
[5] The error message is appended to the Part 1a/MTE, attached.

Respectfully submitted,
Teleport Communications America, LLC

By their Attorneys,

Wendie C. Stabler (#2220)
222 Delaware Avenue, Suite 1200
P.O. Box 1266
Wilmington, DE 19899
(tel) 302.421.6865
(fax) 302.421.5868

Dated: October 30, 2014

OFFICER VERIFICATION

STATE OF NEW JERSEY :
: ss.
COUNTY OF Hunterdon :

I, James F. Dionne, state that I am a the Chief Financial Officer of Teleport Communications America, LLC; that I am authorized to make this Verification on behalf of Teleport Communications America, LLC; that the foregoing filing was prepared under my direction and supervision; and that the statements in the foregoing document are true and correct to the best of my knowledge, information, and belief.

Name: James F. Dionne
Title: Chief Financial Officer
Teleport Communications America, LLC

SWORN TO AND SUBSCRIBED before me
this 28th day of October, 2014.

Robert Cancillieri
Notary Public

Robert Cancillieri
Notary Public of New Jersey
My Commission Expires
June 18, 2018

PROPRIETARY VERSION

OF ATTACHMENT

TO VERIFIED APPLICATION OF
TELEPORT COMMUNICATIONS AMERICA, LLC,
FOR TWO BLOCKS OF TELEPHONE NUMBERS
USING THE FCC SAFETY VALVE PROCESS

BERKLEY TECHNOLOGY SERVICES, LLC

Berkley Technology Services LLC.

101 Bellevue Parkway
Wilmington, DE 19809

October 21, 2014

RE: Letter of Intent

AT&T TNAC,

This Letter of Intent represents a request by W.R. Berkley for 1300 numbers for BVoIP Service. W.R. Berkley intends to order service, in the Holly Oak rate center, on the PHLAPASBDS0 switch pending AT&T's successful completion of the required testing. W.R. Berkley intends to activate these numbers within 180 days from AT&T's receipt of the numbers.
W.R. Berkley has over 6000 employees. The requested 1300 numbers will be utilized to support disaster recovery and business continuity operations for the various W.R. Berkley companies.

Sincerely,

David Halter

David Halter
Network Planning Engineer
Berkley Technology Services
507-449-6861
dhalter@wrberkley.com

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 302-HOLLY OAK-DE-768200

Individual Block Request

Type of Application: New [i] **Change** **Disconnect**

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TCG NEW JERSEY, INC. - PA

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: [ii]

Contact Name: Agnes Rom

Contact Address: 1800 Sutter St

City,State,Zip: Concord ,CA,94520

Phone: 925-363-7650 FAX: 925-363-7681

E-mail: agnes.rom@neustar.biz

1.2 General Information:

Check one : No LRN needed __X__ LRN needed [iii] _____

Parent Company's OCN

NPA: 302 LATA: 228 OCN: [iv] 7125
7309

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : [v]
PHLAPASBDS0

City or Wire Center Name :_____

Rate Center: [vi]
HOLLY OAK

Rate Center Sub Zone:_____

1.3 Dates:

Date of Application: [vii] _
10/10/2014

Requested Block Effective Date: [viii]
11/10/2014

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) _____
302-281-6

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.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level[1]
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **302-HOLLY OAK-DE-768200**

Date: **10/10/2014** OCN:**7309** Company Name:**TCG NEW JERSEY, INC. - PA**

Rate Center: **HOLLY OAK**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):**NPA NXX BLOCK ID 302 826 9 302 826 A**

Name of Block Applicant:**Luke Riga** Signature: **Luke Riga**

Title:**Manager** Telephone No.: **908-234-6795** FAX No.: **908-234-8044**

E-mail: **lriga@att.com**

A. Available Numbers:**802**

B. Assigned Numbers: **197**

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 calculation [2]:**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
E. Growth History - Previous 6	**0**	**0**	**0**	**0**	**0**	**300**						

months[3]												
F. Forecast - Next 12 months[4]	**1000**	3	2	2	3	1	3	3	3	4	5	5

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **168.5**

H. Months to Exhaust[5] = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Block Requested	Available Numbers	Months To Exhaust
1	**802**	**4.76**

I. Utilization[6] = $\frac{\text{Assigned Numbers(B) - Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}}$ X 100 = **19.7**

Explanation: _____

[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]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 received=2,000 and 1 code received =10,000).

[3]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.

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

[5]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, section 52.15 (g) (3) (iii)).

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

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 302-HOLLY OAK-DE-768200

Date of Application: 10/10/2014 Effective Date:
Date of Receipt: 10/10/2014 Date of Response: 10/10/2014

Service Provider Name: TCG NEW JERSEY, INC. - PA
(Telcordia ™ LERG ™ Routing Guide) OCN: 7309
Parent Company OCN: 7125

NPAC SOA SPID :

Pooling Administrator Contact Information:
Agnes Rom
Signature of Pooling Administrator
Phone: 925-363-7650
Agnes Rom
Name (print)
Fax: 925-363-7681
Email: agnes.rom@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] PHLAPASBDS0
Rate Center: HOLLY OAK
Rate Center Sub Zone:

X **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.