

July 24, 2019

Missouri Public Service Commission Honorable Judge Morris L. Woodruff 200 Madison Street Jefferson City, MO 65102

Re: St. Luke's Health System Number Request

Dear Judge Woodruff,

With this letter Teleport Communications America, LLC ("Teleport"), an affiliate of AT&T Corp., has filed an application seeking the Commission's review and reversal of the North American Number Plan Thousands-Block Pooling Administrator's decision concerning a request for telephone numbers to serve St. Luke's Primary Care facility in Clinton, Missouri.

Pursuant to Commission rule 4 CSR 240-2.135(2)(B), we have designated and filed Exhibit E to this application as "Confidential" because it contains very competitively sensitive information not available to the public in any format. This exhibit, the FCC Form U1 of Form 502 for the Clinton, Missouri rate center, shows the number of AT&T Missouri retail residential and business access lines by NPA-NXX within the rate center.

Access line information disaggregated in this fashion reveals the number of access lines a carrier serves on a very specific and localized geographic or market segment basis. This internal market-share information has been developed at great expense and is closely guarded by all carriers. If made public, this type of information would make carriers more vulnerable to the marketing efforts of their competitors. As a result, access line information at this level of detail is kept confidential by carriers in the industry and is not available to the public in any format.

Accordingly, this information falls squarely within the "Confidential" classification of 4 CSR 240-2.135(2)(A)(3): "marketing analysis or other market-specific information relating to services offered in competition with others."

Please call me with any questions or if anything further is needed.

Very truly yours,

Leo J. Bub

Attachments



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Teleport)		
Communications America, LLC)		
for Review and Reversal Of North American)	Case No	
Number Plan Thousands-Block Pooling)		
Administrator's Decision to Withhold Numbering)		
Resources)		

TELEPORT'S APPLICATION

Teleport Communications America, LLC ("Teleport"), an affiliate of AT&T Corp., respectfully requests ¹ the Commission issue an Order reviewing and reversing Somos' ² denial of 100 consecutive numbers Teleport requested to meet Saint Luke's Health System telecommunications needs at its Primary Care facility in Clinton, Missouri.

In support of this Application, Teleport states:

1. Teleport is a Delaware limited liability company with headquarters at One AT&T Way, Bedminster, New Jersey 07921. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. Teleport is authorized to do business in Missouri. Teleport is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide

 $^{^{1}}$ Teleport files this verified Application pursuant to 4 CSR 240-2.060, 4 CSR 240-28.016(1) and 47 CFR 52.15(g)(3)(iv).

² In 2018, the North American Numbering Plan Administrator ("NANPA") function was competitively bid by the FCC and Somos was chosen to act as the NANPA for a one-year term.

³ In accordance with 4 CSR 240-2.060(1)(G), a certified copy of Teleport's Certificate of Registration as a Foreign Limited Liability Company, issued on June 7, 2012, by the Missouri Secretary of State was filed with the Commission on August 1, 2012, in Case No. TA-2013-0040. Teleport presently does not transact business in Missouri under any fictitious name.

"telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo.⁴

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Leo J. Bub Attorney for Teleport Communications America, LLC 1010 Pine Street, Room 19E-D-01 St. Louis, Missouri 63101

- 3. Saint Luke's Health System, at its Primary Care facility in the Clinton area, has migrated to B-VoIP and would like to add 100 DID numbers in the format 660-XX4-72XX such that they integrate into the existing network in the Kansas City metro area. This location has had outdated equipment and could not provide DID service until now. (*See* Exhibit A). The Industry pool currently has 660-924-7000 available but 660-924-7200 is contaminated by 1 number. In the spirit of number conservation and to activate service quicker, Saint Luke's Health System has agreed to take the contaminated block even if they only receive 99 available numbers.
- 4. Teleport has researched the available numbering resources in the Clinton rate center and has determined that it cannot meet the customer's needs. Teleport has 660-869-4 with ~900 numbers but that does not meet their requested format of 660-XX4-72XX.
- 5. Consequently, Teleport requests that the Commission grant it numbering resources consisting of one (1) thousands block.
- 6. On June 27, 2019 Teleport submitted a thousands-block Application Form, Part 1A, for the numbering resources assignment necessary to meet Saint Luke's needs (Exhibit B). Teleport completed the Application in accordance with the Industry Numbering Committee's

⁴ Teleport received a certificate of service authority to provide basic local, nonswitched local, and interexchange telecommunications services in the State of Missouri from the MoPSC on August 28, 2012, in Case No. TA-2013-0040.

Thousands-Block Pooling Assignment Guidelines and completed the necessary Months-to-Exhaust and Utilization Certification Worksheet (Exhibit C).

- 7. On June 27, 2019, Somos denied the request on the grounds that Teleport had not met the months-to-exhaust or utilization thresholds. (Exhibit D)
- 8. Teleport respectfully asks the Commission to overturn Somos' decision to withhold numbering resources. This Commission has overturned the North American Numbering Plan Administrator's decision to withhold numbering resources in several cases and Teleport respectfully submits that it should likewise do so here.
- 9. Under existing procedures, Somos has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000, Order in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn Somos' decision to withhold numbering resources. Thus, the Commission has the authority to "affirm or overturn" Somos' decision to withhold numbering resources from the carrier "based on its determination of compliance with the reporting and numbering resource application requirements herein." Moreover, the FCC determined that states may overturn Somos' decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request:

We also agree with WinStar that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for

⁶ *Id*.

⁵ Report and Order and Further Notice of Proposed Rule Making, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

numbering resources in a given rate center that it cannot meet with its current inventory.⁷

- 10. The FCC further explained in its March 31, 2000, <u>Order</u> that a "[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers." Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated "in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests."
- 11. Further, this Application complies with 4 CSR 240-28.016(1). Teleport has attached hereto its "Months-to-Exhaust Worksheet" indicating the month-to-exhaust in the Clinton rate center encompassing both the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-28.016(1)(A). (Exhibit C). Teleport has also attached hereto its most recently-filed FCC Form U1 of Form 502 for this rate center. 4 CSR 240-28.016(1)(B). (Exhibit E Confidential). Finally, Teleport attaches copies of its originally-filed request to Somos (i.e., its Thousands-Block Application Form, Part 1A and Somos' denial of that request. 4 CSR 240-28.016(1)(C). (Exhibits B and D, respectively). These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, Teleport has exhausted all other available remedies designed to conserve numbering resources. 4 CSR 240-28.016(1)(D).

⁷ <u>Third Report and Order and Second Order on Reconsideration</u>, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, et al., December 12, 2001, paragraph 64; *see also*, 47 CFR 52.15(g)(4).

[°] Id.

⁹ *Id.* at paragraph 66.

12. Teleport has no final unsatisfied judgments or decisions against it from any state or federal agency or court which involve Missouri retail customer service or rates, which action,

judgment or decision has occurred within three (3) years of the date of this Application.

13. Teleport does not have any annual report or assessment fees that are overdue in

14. Saint Luke's has explained that these numbers are needed in order to add

additional DIDs for its Primary Care facility in Clinton.

Missouri.

described herein.

WHEREFORE, Teleport respectfully requests that the Commission overturn Somos's previous determination in this matter and instruct Somos to release the numbering resources

Respectfully submitted,

TELEPORT COMMUNICATIONS AMERICA, LLC

By: Yw ML

#34326 Leo J. Bub

Attorney for Teleport Communications America, LLC

1010 Pine Street, Room 19E-D-01

St. Louis, Missouri 63101

T: 314-396-3679 leo.bub@att.com

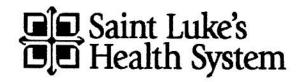
CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by email on July $24,\,2019$

Lu M

Leo J. Bub

Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov Office of The Public Counsel P.O. Box 7800 Jefferson City, MO 65102 opcservice@ded.mo.gov



Date 06-24-2019

Information Services
Saint Luke's Health System
800 NW Chipman Road, Suite 5950
Lee's Summit, MO 64063

TNAC:

Please accept this Letter of Intent requesting additional numbering resources. Saint Luke's Health System requests 100 consecutive numbers in the Clinton rate center.

Saint Luke's Health System is a non-profit hospital network in the bi-state Kansas City metro area, located in northeast Kansas and northwest Missouri. With over 12,000 local employees, Saint Luke's Health System is the third largest private employer in the Kansas City metro.

PSTN connection for Saint Luke's Medical Group located at 603 E Gaines Dr, Clinton, MO was recently migrated to BVOIP over SIP trunk. Due to an outdated CO equipment this location had never been able to utilize DID service. We would like to provide it at this time. Given this is a service expansion project we will not be returning our existing numbers.

This facility is also part of a larger voice network that utilizes approximately 20,000 DID numbers from different Central Office locations across the greater Kansas City metro area.

SLHS has requested AT&T for additional 100 DID numbers and was provided with the only 100 DID block of consecutive numbers that are in conflict with our existing greater Kansas City Metro hospital 5 digit dialing plan therefore, specific DNs are being requested in order to fit into this large dialing plan.

The Safety Valve Request is for 100 consecutive DID range in 660-XX4-72XX format if possible. DID range in 660-XXX-72XX format will be less preferable, but acceptable.

Pending AT&T's successful completion of testing, Saint Luke's Health System understands these numbers will need to be activated within 180 days of the effective date.

Olga Sencheer

Thank you for your help.

Best regards.
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

Tracking Number: 660-CLINTON-MO-1166322

> Thousands-Block Application Form - Part 1A Revised: January 4, 2016

Individual Block Request

Type of

Application:

1 New

Change i

Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company

Name:

TELEPORT COMMUNICATIONS AMERICA, LLC - MO

Headquarters

Address:

One AT&T Way

City:

Bedminster

ZIP: 07920

Contact

Name:

Luke Riga

Contact Address:

One AT&T Way

City:

Bedminster

State:

State:

NЛ

NJ

ZIP: 07920

Phone: 908-234-6795

Fax: 908-234-8044

E-mail: Iriga@att.com

Pooling Administrator:ii

Contact

Name:

Margaret Harrell-Simington

Contact

1800 Sutter Street, Suite 780

Address:

Concord

State:

CA

ZIP: 94520

City: Phone:

925-420-0346

Fax: 925-420-0377

E-mail: mharrell-simington@somos.com

1.2 General Information:
Check one: No LRN needed LRN needediii;
NPA: 660 LATA: 524 OCN ^{iv} : 6123 Parent Company's OCN 7125
Number of Thousands-Blocks Requested : 1
Switch Identification (Switching Entity/POI ^v): KSCYMO09YMD
Rate Center ^{vi} : CLINTON
1.3 Dates:
Date of Application ^{vii} :_ Requested Effective Date ^{viii} : 07/29/2019
Requested Expedited Treatment? (See Section 8.6) YesNox
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: <u>CAP OR CLEC</u> (LEC, IXC, CMRS, Other) b) Primary Type of Service Blocks to be used for: <u>Wireline</u> c) Thousands-Block(s) (NXX-X) assignment preference (Optional)
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: YesIf Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center: worksheet	Yes X If Yes, attach months to	exhaust
block in red and explicitly und	box, I acknowledge that I am willing to a derstand that the underlying CO code ma ded in the NPAC on the block effective or	v not vet he
Type of change (Mark all that		
OCN: Intra-compa	ny ^{ix} Switching Id 11 Part 1B	
OCN: Inter-compa	any ^x : Effective Date	
Change block : YesI	f Yes, list NPA-NXX-X	200
1.6 Block Return:		
 d) Have all new Intra SP por d) Has this block been prote 	ed: Yes No e NOT available for assignment : erts been completed in the NPAC: Yes ected from further assignment: Yes If Yes, list NPA-NXX-X	No
Remarks:		
accurate to the best of my known in accordance with the Thousa	information requesting an NXX-X block wledge and that this application has been nds-Block (NXX-X) Pooling Administration the ATIS web site (www.atis.or, he date of this application.	prepared ation
Luke Riga	<u>Manager</u>	06/27/2019
Signature of Block Applicant		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 Guidexi. 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 thousandsblock.

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:

Identify the type of change(s) in Section 1.5.

iiThe Pool Administrator is available to assist in completing these forms.

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

ivOperating 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 /POI.

viRate 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 CLLITM, LERGTM Routing Guide and iconectivTM 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 Level 1

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 660-CLINTON-MO-1166322

Date: Thursday, June OCN-6123 Company Name: TELEPORT COMMUNICATIONS

27, 2019

OCN:6123 AMERICA, LLC - MO

Rate Center: CLINTON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)2:660-869-4,

Name of Block Applicant: Luke

Signature: Luke Riga

Riga

Title:Manager

Phone: 908-234-6795-

Fax: 908-234-8044

E-Mail: <u>lriga@att.com</u>

A. Available Numbers:899

B. Assigned Numbers: 101

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 3:0

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 ⁴	<u>100</u>	1	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>		v		10	11	12
F. Forecast - Next 12 months ⁵	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>	<u>17</u>
G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):17.0												
H. Months to Exhaust ⁶ = Numbers Available for Assignment to Customers (A)												
	A	verage	Month	ly Fore	cast (G))						
		Block	k Reque	ested		Availa	ble Nur 899	<u>nbers</u>		Month	s To Ex	<u>thaust</u>
I. Utilization ⁷ Assigned Numbers (B) X 100 = 10.1 Total Numbering Resources (C)-Excluded Numbers (D)												
Explanation:												

^IA 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.

²List all numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS.

When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired 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).

⁶Net 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.

⁷Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly 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:	660-CLINTO MO-1166322		
Date of Application:	06/27/2019	Effective Date	:
Date of Receipt:	06/27/2019	Date of Respo	nse: 06/27/2019
Service Provider Name:	TELEPORT	COMMUNICATIONS A	MERICA, LLC - MO
(LERG TM Routing Guide ¹) OCN:	6123	60 000 We 2 1 2 1 1 1 2 1	· · · · · · · · · · · · · · · · · · ·
Parent Company OCN:	7125		NA A AND CONTRACT CONTRACTOR (C.S.).
NPAC SOA SPID :	38	7. 864 0	
Pooling Administrator Community Margaret Harrell-Simington Signature of Pooling Administrator	on	nation: Phone:	925-420-0346
Margaret Harrell-Simington Name (print)		Fax:	925-420-0377
Email:		mharrell- simington@somos.cor	n
NPA-NXX or NPA-NXX-X :		Block Assigned:	
		Block Reserved:	
		Block Reservation Expiration Date:	To the second se
		Block/Code Modified:	1) 100 Village and discount
		Block/Code Disconnected:	
Block Contaminated	(Yes or No):		940 0 0 0 0
		ontaminated (1-1000):	en e

Switch Identification (Switching/POI) ² :	KSCYMO09YMD
Rate Center:	CLINTON
X Form complete, request denied.	
Explanation:	
DR-57: You do not meet the MTE and/or Utilization request for a new block is denied. You may proceed Waiver from the appropriate state commission usin are in disagreement with the disposition of this req Thousands-Block Number (NXX-X) Pooling Administration appeals process.	d with requesting a State g this Part 3 denial. If you uest, please refer to the
Request Withdrawn.	
Explanation:	
Assignment Activity Suspended by Administrator. Explanation:	
el e	
Remarks:	

¹ Telcordia[®] is a registered trademark and LERGTM Routing Guide and iconectivTM 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 (CLLITM 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.

