

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

IN THE MATTER OF THE APPLICATION OF	)	
WINDSTREAM MISSOURI, LLC FOR	)	
REVIEW AND REVERSAL OF THE DECISION	)	CASE NO. _____
OF NEUSTAR, INC. AS THE POOLING	)	
ADMINISTRATOR TO WITHHOLD	)	
NUMBERING RESOURCES	)	

**APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Windstream Missouri, LLC (“Windstream”) and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. (“NANPA”) to withhold certain numbering resources from Windstream.

The requested numbering resources are necessary to support the deployment of a Connect America Fund Phase 2 (“CAF2”) project.

In support of this Application, Windstream states as follows:

1. Windstream is a Missouri limited liability company duly authorized to conduct business in Missouri, as evidenced by the Certificate of Amendment filed on June 21, 2006 in Case No. IN-2006-0481, and incorporated by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G). Windstream’s principal office is located at 4001 North Rodney Parham Road, Little Rock, Arkansas 72212. Windstream is a “local exchange telecommunications company” and a “public utility,” and is duly authorized to provide “telecommunications service” within the State of Missouri as each of those phrases is defined in Section 386.020, RSMo 2000.

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

Carol Keith  
Deputy General Counsel  
Windstream Missouri, LLC  
4001 N. Rodney Parham Road  
Little Rock, AR 72112

3. This Application is prompted by the need to serve customers in its Union Star rate center via a new packet switch being deployed to support the CAF2 project in this area. According to the applicable industry *Location Routing Number (LRN) Assignment Practices document (ATIS-0300065)* Windstream must establish a unique LRN to identify the recipient switch or POI and must establish one LRN per LATA per switch from an assigned NXX for the recipient switch in the number portability capable network. Thus, Windstream must obtain an LRN for the new packet switch located in the Union Star rate center. Also pursuant to industry guidelines, only an NXX code holder can obtain an LRN, thus necessitating Windstream's request for an NXX code for this rate center. It should be noted, however, that Windstream would retain only a single thousand-number-block from the new NXX code.

4. Given the need described above, on January 12, 2018, Windstream submitted an Application for the LRNs, NXX code and thousand number blocks required to complete the CAF2 project to NeuStar, acting as the NANPA. (A copy of Windstream's Application is attached hereto and incorporated by reference herein as Exhibit A.)

5. NeuStar subsequently denied Windstream's request on the grounds that it failed to meet the months-to-exhaust criteria and/or the utilization criteria established by the Federal Communications Commission ("FCC"). (Copies of both NeuStar's denial are attached hereto and incorporated by reference herein as Exhibit B.) As a result of NeuStar's denial, Windstream has been unable to obtain the LRNs, NXX codes and thousand number blocks it requested and which are required for deployment of this CAF2 project.

6. Under existing procedures, NeuStar, as the NANPA, is required to accept or reject an application for numbering resources based solely on FCC criteria, which require that an applicant establish that its existing numbers inventory within the rate center will exhaust within six months of the application and sets a rate center utilization threshold of seventy-five percent.<sup>1</sup> However, as the Commission is aware,

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<sup>1</sup> *Second Report and Order, Order on Reconsideration* in CC Docket No. 96-98 and CC Docket No. 99-200 and *Second Further Notice of Proposed Rulemaking* in CC Docket No. 99-200, In the Matter of Numbering Resource

the FCC has adopted a safety valve mechanism to allow carriers that do not meet the months-to-exhaust and utilization criteria in a given rate center to obtain additional numbering resources. In establishing the safety valve, the FCC recognized that conditions that could give rise to a need for additional numbering resources “might include situations where a carrier has multiple switches within a rate center but it is unable to readily share numbering resources among those switches.”<sup>2</sup> The FCC makes clear that through the safety valve mechanism a carrier may challenge a numbering resource denial by the NANPA before the appropriate state regulatory commission and that the state commission has jurisdiction to affirm or overturn the NANPA’s decision to withhold numbering resources.

7. Windstream seeks the Commission’s reversal of NeuStar’s decision, acting as NANPA, and requests the Commission to direct NeuStar to assign one LRN. The FCC permits such direction in order to meet specific customer demands and specifically grants state commissions “flexibility to direct the NANPA or pooling Administrator to assign additional numbering resources to carriers that have demonstrated a verifiable need for additional numbering resources outside of these specifically enumerated instances.”<sup>3</sup> Windstream has demonstrated a verifiable need due to its needs in connection with a CAF2 project upgrade to this rural exchange. Windstream cannot meet the requirements of this request from its current inventory or in any other manner.

8. Windstream respectfully requests that the Commission act upon this Application within ten (10) business days. The FCC has recognized the importance of timely action:

[W]e recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier’s ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish a specific time limit for states to act on these requests, we believe that, in most instances, 10 business days from receipt of a request that

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Optimization, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215 and 717, FCC 00-419 (rel. December 29, 2000), at ¶ 29.

<sup>2</sup> *Third Report and Order and Second Order on Reconsideration* in CC Docket No. 96-98 and CC Docket No. 99-200, In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and the Telephone Number Portability, FCC 01-362, (rel. December 28, 2001), ¶¶58, 61 and 65.

<sup>3</sup> FCC 01-362 at ¶61.

the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.<sup>4</sup>

9. This Application complies with the Commission's applicable rule, 4 CSR 240-37.040. Windstream has attached hereto its "Months to Exhaust Worksheets" indicating the utilization of the covered rate centers encompassing both the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-37.040(1)(A)1. See, Exhibit C, respectively, attached hereto and incorporated by reference. Additionally, Windstream has attached copies of its originally-filed requests to NANPA and NANPA's denial of those requests. 4 CSR 240-37.040(1)(A)3. See, Exhibits A and B, respectively. These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. Windstream has exhausted all other available remedies designed to conserve numbering resources as related to this request.

10. Granting Windstream's Application will not adversely affect the numbering resources available for use by carriers throughout the state in providing telecommunications services to their customers. Granting Windstream's request is in the public interest and consistent with the FCC's rules and decisions.

11. Windstream 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, nor does Windstream have any pending action against it in Missouri, brought by end-user customers, which involves retail customer service or rates.

12. Windstream does not have any annual report or assessment fees that are overdue in Missouri.

WHEREFORE, Windstream respectfully requests that the Commission overturn and reverse NeuStar's previous determination as the NANPA; direct NeuStar to grant Windstream's applications regarding its request for the numbering resources included in those applications and as described herein; act within ten (10) business days as suggested by the FCC or as soon thereafter as is possible; instruct

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<sup>4</sup> *Id.* at ¶66.

NeuStar acting as NANPA to release the numbering resources as specified herein; and grant all other proper relief to which Windstream may be entitled.

Respectfully submitted,

Windstream Missouri, LLC

By: \_\_\_\_\_

Carol Keith MBN 45065  
Deputy General Counsel -  
Windstream Missouri, LLC  
4001 N. Rodney Parham  
Little Rock, AR 72212  
Telephone: (847) 550-4433  
Facsimile: (330) 486-3561  
E-mail: Carol.Keith@windstream.com

Attorney for Windstream Missouri, LLC

VERIFICATION

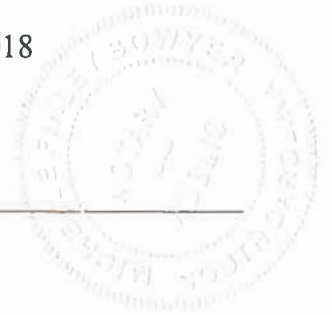
STATE OF SOUTH CAROLINA )  
 ) SS  
COUNTY OF GREENVILLE )

I, Mary Lisa Richards of lawful age, being first duly sworn upon my oath, state that I am the Code Administrator, and that I am authorized to make this verification on behalf of Windstream Missouri, LLC; and that the facts set forth in the foregoing pleading are true to the best of my knowledge, information and belief.

Mary Lisa Richards  
(Name)

Subscribed and sworn to before me this 23<sup>rd</sup> day of January, 2018

Mitchelle Bowyer  
Notary Public



My Commission expires:

October 30, 2018

**CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by first class mail on January 24, 2018.

  
Carol Keith

General Counsel  
Shelley Brueggemann  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Office of the Public Counsel  
200 Madison Street  
P.O. Box 2230  
Jefferson City, MO 65102-2230

# **EXHIBIT A**



Central Office Code Assignment Guidelines (COCAG)  
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking  
Number: **816-UNION STAR-MO-1064566**

**Full NXX: LRN**

Type of  
Application: ☒ New ☐ Change<sup>1</sup>  
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

**Code Applicant:**

Company/Entity  
Name: **WINDSTREAM MISSOURI, INC.**

Headquarters  
Address: **4001 RODNEY PARHAM ROAD**

City, State, Zip: **LITTLE ROCK, AR, 72212**

Contact Name: **MARY RICHARDS**

Contact  
Address: **301 N MAIN STREET**

City: **GREENVILLE** State: **SC** ZIP: **29609**

Phone: **864-672-5329** Fax :

E-mail: **MARY.RICHARDS@WINDSTREAM.COM**

**Code Administrator:**<sup>2</sup>

Name: **David Morgan**

Address: **46000 Center Oak Plaza**

City: **Sterling** State: **VA** ZIP: **20166**

Phone: **571-434-5381** Fax : **571-434-5502**

1.2 NPA: **816** NXX:<sup>3</sup> LATA: **524** OCN:<sup>4</sup>**1885**  
Parent Company's OCN(s) **G118**

Switching Identification (Switching Entity/POI)

<sup>5</sup>**UNSTMOXAPS0**

Locality/City/Wire Center:

Rate Center:<sup>6</sup>**UNION  
STAR**

Homing Tandem Operating Co.<sup>7</sup>:**AT&T**

Tandem Homing  
CLLI<sup>TM8</sup>:**STJSMODN03T**

1.3 DatesDate of Application: 01/12/2018

Requested Effective

Date:<sup>9,10</sup>03/19/2018

☐ 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 Yes \_\_\_\_\_ No X

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): Incumbent Local Exchange Carrier (ILEC)b) Type of service (e.g., Cellular - Type 2): Wireline

c) Code Assignment Preference (Optional) \_\_\_\_\_

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company<sup>11</sup> ☐ Switching Id ☐ Rate Center ☐ Tandem  
Homing CLLI☐ OCN-Inter-company<sup>12</sup> ☐ Effective Date ☐ LATA ☐ Extend  
Reservations1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: <sup>13</sup> ☒ Yes ☐ No1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No1.7 Code request for new service (Explain): CAF2 SWITCH DEPLOYMENT

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRDS. The 45-calendar day nationwide minimum interval cut-over for BIRDS will not begin until input into BIRDS has been completed.

Comments:

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I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application<sup>14</sup>.

**MARY RICHARDS**

Signature of Code Applicant

**CODE ADMINISTRATOR** **01/12/2018**

Title

Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup>The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup>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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language<sup>®</sup> Location Code (CLLI<sup>TM</sup> Code) of the applicant's switch or POI. Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>6</sup>Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</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, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup>Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup>Select if you are the current Code Holder

<sup>12</sup>Select if you are not the current Code Holder

<sup>13</sup>The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup>An incomplete form may result in delays in processing this request.

Tracking Number: **816-UNION STAR-MO-1064566**

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

**Full NXX: LRN**

Type of Application: ☒ New ☐ Change <sup>i</sup> ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **WINDSTREAM MISSOURI, INC.**

Headquarters Address: **4001 RODNEY PARHAM ROAD**

City: **LITTLE ROCK** State: **AR** ZIP: **72212**

Contact Name: **MARY RICHARDS**

Contact Address: **301 N MAIN STREET**

City: **GREENVILLE** State: **SC** ZIP: **29609**

Phone: **864-672-5329** Fax:

E-mail: **MARY.RICHARDS@WINDSTREAM.COM**

Pooling Administrator:<sup>ii</sup>

Contact Name: **Margaret Harrell-Simington**

Contact Address: **1800 Sutter Street, Suite 780**

City: **Concord** State: **CA** ZIP: **94520**

Phone: **925-363-8747** Fax: **925-363-8747**

E-mail: **margaret.harrell-simington@neustar.biz**

1.2 General Information:

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

NPA: 816 LATA: 524 OCN<sup>iv</sup>: 1885 Parent Company's OCN G118

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI<sup>v</sup>):  
UNSTMOXAPS0

Rate Center<sup>vi</sup>: UNION STAR

### 1.3 Dates:

Date of Application<sup>vii</sup>:  
01/12/2018

Requested Effective Date<sup>viii</sup>:  
03/19/2018

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

☐ 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 : Incumbent Local Exchange Carrier (ILEC)  
(LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : Wireline

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) 816-xxx-9.

### 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 \_\_\_\_\_ 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 \_\_\_\_\_ No \_\_\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_\_ 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 ([www.atis.org/inc](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**MARY RICHARDS**

**CODE ADMINISTRATOR**

**01/12/2018**

Signature of Block Applicant Title

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 (iconectiv<sup>TM</sup>) LERG<sup>TM</sup> Routing Guide<sup>xi</sup>. 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 iconectiv<sup>TM</sup> 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 thousands-block.

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:

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup>A CO Code application will also need to be submitted to the PA.

<sup>iv</sup>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).

<sup>v</sup>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<sup>TM</sup> Code of the switch /POI.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

<sup>vii</sup>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.



<sup>viii</sup> 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).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

# **EXHIBIT B**

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

**Revised: January 4, 2016**

**Pooling Administrator's Response/Confirmation**

Tracking Number : 816-UNION STAR-  
MO-1064566

Date of Application: 01/12/2018 Effective Date: \_\_\_\_\_

Date of Receipt: 01/12/2018 Date of Response: 01/12/2018

Service Provider Name: WINDSTREAM MISSOURI, INC.

(LERG<sup>TM</sup> Routing Guide<sup>1</sup>) OCN: 1885

Parent Company OCN: G118

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Margaret Harrell-Simington Phone: 925-363-8747

Signature of Pooling Administrator

Margaret Harrell-Simington Fax: 925-363-8747

Name (print)

Email: margaret.harrell-simington@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 (1-1000): \_\_\_\_\_

**UNSTMOXAPS0**

Switch Identification (Switching/POI)<sup>2</sup>:

Rate Center:

UNION STAR

☒ 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:

<sup>1</sup> Telcordia<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language<sup>®</sup> Location Code (CLLI<sup>™</sup> Code) of the switching entity/POI shown on the Part 1A form. Common Language<sup>®</sup> is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

# **EXHIBIT C**

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

Date: 01/10/2018 OCN: 1885 Company Name: Windstream Communications  
Rate Center: UNION STAR, MO  
List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s)816-593-0,1,2,4,5,7,8 & 9  
Name of Block Applicant: Connie McKie Signature:  
Title: MIROR Coordinator Telephone No.: 786-629-4242 FAX No.: 706-776-3495  
E-Mail: Connie.McKie@windstream.com

A. Available Numbers: 7664

B. Assigned Numbers: 283

C. Total Numbering Resources: 8,000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:  
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 months <sup>2</sup>	4	1	4	13	14	-36						
F. Forecast – Next 12 months <sup>3</sup>	1	1	1	1	1	2	2	2	2	3	3	3

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 1.83

H. Months to Exhaust<sup>4</sup>  
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = 4187.9$$

I. Utilization<sup>5</sup>  
$$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = 3.53\%$$

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 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))

## Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>  
(Thousands-Block Number Pooling Growth Block Request)Tracking Number: 816-UNION STAR-MO-1064566Date: Friday, January 12, 2018 OCN: 1885Company Name: WINDSTREAM MISSOURI, INC.Rate Center: UNION STARList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 816-593-0,1,2,4,5,7,8,9Name of Block Applicant: MARY RICHARDSSignature: MARY RICHARDSTitle: CODE ADMINISTRATORPhone: 864-672-5329-

Fax:

E-Mail: MARY.RICHARDS@WINDSTREAM.COMA. Available Numbers: 7664B. Assigned Numbers: 283C. Total Numbering Resources: 8000D. 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>: 0List  
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>4</u>	<u>1</u>	<u>-4</u>	<u>13</u>	<u>14</u>	<u>-36</u>						

E. Growth  
History -  
Previous 6  
months<sup>4</sup>

F. Forecast  
- Next 12  
months<sup>5</sup>

<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>3</u>	<u>3</u>	<u>3</u>
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G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 1.167

H. Months  
to Exhaust<sup>6</sup>  
=

Numbers Available for Assignment to  
Customers (A)

Average Monthly Forecast (G)

Block Requested

1

Available Numbers

7664

Months To Exhaust

6567.266

I.

Utilization<sup>7</sup>  
=

Assigned Numbers (B)

X 100 =

3.537

Total Numbering Resources (C)-Excluded  
Numbers (D)

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

<sup>4</sup> 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.

<sup>5</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month 1.



<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4) (ii))