BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)		
Southwestern Bell Telephone, L.P., d/b/a)		
AT&T Missouri For Review and Reversal)	Case No	
Of North American Number Plan)		
Administrator's Decision to Withhold)		
Numbering Resources)		

SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri")¹ and files this verified application and motion for expedited treatment, pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), and 47 CFR 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an Order that reviews and reverses the decision of the North American Numbering Plan Administrator, NeuStar, Inc. ("NANPA"), to withhold certain numbering resources from AT&T Missouri, in a form of four pristine thousands-number blocks of numbers to service the needs of J.P. Morgan Chase Bank ("J.P. Morgan"), located at 9300 Ward Parkway in Kansas City, Missouri, 64114, which is assuming the servicing of certain clients of American Century Services. In support of this application, AT&T Missouri states as follows:

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¹ Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri").

- 1. AT&T Missouri is a Texas limited partnership², duly authorized to conduct business in Missouri,³ with its principal Missouri office at One AT&T Center, Room 3500, St. Louis, Missouri, 63101. AT&T Missouri is authorized to do business in Missouri and its fictitious name is duly registered with the Missouri Secretary of State.⁴ AT&T Missouri 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 proceeding should be sent to:

Paul G. Lane Leo J. Bub Robert J. Gryzmala Attorneys for Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri One AT&T Center, Room 3520 St. Louis, Missouri 63101

3. J.P. Morgan has requested four pristine thousands-number blocks of Direct Inward Dial ("DID") numbers and has specifically requested that these numbers be in the thousands-number block ranges of 2000 – 4999 (i.e., three consecutive blocks) and 7,000 – 7,999 (i.e., one block), if possible, in the 816 NPA. AT&T Missouri has researched the available blocks in its Kansas City rate center which serves the J.P. Morgan location. AT&T Missouri has no available thousands-blocks available for use

² AT&T Missouri filed a copy of its Limited Partnership Agreement with the Commission on October 12, 2001. See In the Matter of the Application of Southwestern Bell Telephone Company To Transfer Property and Ownership of Stock Pursuant to Section 392.200, RSMo., Case No. TO-2002-185, October 12, 2001.

³ AT&T Missouri filed a certificate from the Missouri Secretary of State Certifying that Southwestern Bell Telephone, L.P. is a foreign limited partnership that is duly authorized to transact business in the State of Missouri with the Commission on January 7, 2002. See In the Matter of the Application of Southwestern Bell Telephone Company to Transfer Property and Ownership of Stock Pursuant to Section 392.300, RSMo., Case No. TO-2002-185, January 7, 2002.

⁴ A copy of the registration of the fictitious name "AT&T Missouri" is attached hereto and marked as Exhibit A.

that meet the customer's needs. In order to best meet the needs of J.P. Morgan, AT&T Missouri requests that the Commission grant it four pristine thousands-number blocks, in the ranges of 2000 – 4999 and 7,000 – 7,999 in the NPA-NXX of 816-673. If the requested 816-673 blocks are unavailable at the time of the Commission's Order, AT&T Missouri requests that the Commission grant it any other suitable blocks that meet J.P. Morgan's request. A copy of the September 11, 2006, letter from Cynthia S. Davis, an employee of J.P. Morgan, to AT&T Missouri, is attached hereto and marked as Exhibit B. J.P. Morgan requests four pristine thousands-number blocks (i.e. pristine blocks) due to compatibility with its telecommunications system.

- 4. On August 21, 2006, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the assignment of four thousands-number blocks necessary to meet J.P. Morgan's request. A copy of the Application is attached hereto and is marked as Exhibit C. AT&T Missouri completed the application in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet which is attached hereto and marked as Exhibit D.
- 5. AT&T Missouri submitted the request for four thousands-number blocks because AT&T Missouri does not have four thousands-number blocks available to service J.P. Morgan's needs. AT&T Missouri is unable to use numbers from any other switch in the Kansas City rate center area or in the 816 NPA to satisfy J.P. Morgan's request.

- 6. On or about August 21, 2006, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization criteria. That decision is attached hereto and marked Exhibit E.
- 7. Under existing procedures, NANPA 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 reaffirm or overturn NANPA's decision to withhold numbering resources. Thus, the Missouri Commission has the authority to "affirm or overturn the NANPA's 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 NANPA's 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 numbering resources in a given rate center that it cannot meet with its current inventory.⁷ The FCC explained 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

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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), a copy of which is attached hereto and marked as Exhibit F).

⁷ Third Report and Order and Second Order on Reconsideration in CC Docket Number 96-98 and CC Docket Number No. 99-200, In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Telephone Number Portability, CC Docket Number 99-200, et al., December 12, 2001, paragraph 64.

in the rate center."⁸ The FCC further explained that states "may grant request for customers seeking contiguous blocks of numbers."⁹ Further, 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."¹⁰

- 8. AT&T Missouri seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. The FCC permits such direction in order to meet specific customer demand. This Commission has overturned NANPA's decision to withhold numbering resources in several cases.¹¹
- 9. AT&T Missouri does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.
- 10. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.

9 <u>10</u>

⁸ Id

¹⁰ <u>Id</u>. at paragraph 66.

¹¹ For instance, the Commission has overturned NANPA's decision in the following cases: (1) Order Reversing Decision of the North American Numbering Plan Administrator and Closing Case. In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, for Review and Reversal of North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2006-0247, December 29, 2005; (2) Order Reversing Decision of the North American Numbering Plan Administrator and Closing Case, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, for Review and Reversal of North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2005-0406, May 26, 2005; (3) Order Granting Additional Numbering Resources, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, for Review and Reversal of the North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2005-0312, April 19, 2005; (4) Order Granting Additional Numbering Plan Resources, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, For Review and Reversal of North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. IO-2003-0318, April 1, 2003; and (5) Order Granting Additional Numbering Resources, In the Matter of the Application of GTE Midwest Incorporated, d/b/a Verizon Midwest for Review and Reversal of North American Number Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2002-481, June 2, 2002.

11. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC. J.P. Morgan has informed AT&T Missouri that it would like to establish service effective September 27, 2006, or as soon thereafter as practicable. In order to accommodate J.P. Morgan's request, the Commission must issue its order as soon as possible, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of four 1,000 blocks to AT&T Missouri to meet J.P. Morgan's needs, and so that AT&T Missouri, and any other telecommunications provider that provides service via a switch, can program its switch. AT&T Missouri filed this request for expedited treatment as soon as it could have. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri's request for numbering resources and AT&T Missouri determined that it was not feasible to implement a technological alternative.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten business days as envisioned by the FCC, and instruct NANPA to release the numbering resources necessary to meet the needs of J.P. Morgan Chase.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

PAUL G. LANE

#27011

LEO J. BUB

#34326

ROBERT J. GRYZMALA

#32454

Attorneys for Southwestern Bell Telephone, L.P.,

d/b/a AT&T Missouri

One AT&T Center, Room 3520

St. Louis, Missouri 63101

314-235-6060 (Telephone)/314-247-0014 (Facsimile)

robert.gryzmala@att.com (E-Mail)

VERIFICATION OF APPLICATION

I, Jason Olson, Director-Regulatory for Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri, and pursuant to 4 CSR 240-2.060(F), hereby swear and affirm that I am authorized to speak on behalf of the Applicant AT&T Missouri and that the statements contained in this application are true and correct to the best of my knowledge, information and belief.

Jason Olson

STATE OF MISSOURI)	
)	SS
CITY OF ST. LOUIS)	

I, Maryann Purcell, a Notary Public do hereby certify that on this 11th day of September, 2006, personally appeared before me Jason Olson who declared that all of the information contained herein above is true, to the best of his knowledge and belief.

Notary Public

My Commission Expires: January 5, 2008

MARYANN PURCELL
Notary Public - Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: Jan. 5, 2008

CERTIFICATE OF SERVICE

Copies of this document were served on all counsel of record by e-mail on September 11, 2006.

Robert J. Grymala

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STATE OF MISSOURI



Robin Carnahan Secretary of State

X00698918

CERTIFICATE OF CORPORATE RECORDS

AT&T MISSOURI

I, ROBIN CARNAHAN, Secretary of the State of the State of Missouri and Keeper of the Great Seal thereof, do hereby certify that the annexed pages contain a full, true and complete copy of the original documents on file and of record in this office for which certification has been requested.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 22nd day of November, 2005

Certification Number: 8195 Secretary feet State

Verify this certificate online at http://www.sos.mo.gov/businessentity/verification



State of Missouri Robin Carnahan, Secretary of State

Corporations Division P.O. Box 778 / 600 W. Main Street, Rm 322 Jefferson City, MO 65102

Business name to be registered:

File Number: 200532522409 X00698918 Date Filed: 11/21/2005 Expiration Date: 11/21/2010 Robin Carnahan Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7) (Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

AT&T Missouri

	One SBC Plaza, 208 S.	One SBC Plaza, 208 S. Akard St.						
(P.O. Box may only be used in	addition to a physical street address)			-				
City, State and Zip Code	Dallas, TX 75202							
The parties having an interest in a percentage owned. If all parties a Name of Owners, Individual or Business Entity Southwestern Bell Telephone, L.P.	the business, and the percentage the are jointly and severally liable, percentage the street and Number One SBC Plaza, 208 S. Akard St.	entage of ownership nee	entity is owner, indicated not be listed.): Zip Code	te business name and If listed, Percentage of ownership must equal 100%				
In Affirmation thereof, the facts	Stated shove are true and correct							
In Affirmation thereof, the facts (The undersigned understands that false sta	stated above are true and correct tements made in this filing are subject to the	::						
115		e penalties provided under Sec	ction 5/5.060 RSMo)					
N= B-	Nathan	n Barth		11_18_2005				
Suthorized Signature	Nathai			11-18-2005 Date				
authorized Signature	Nathan	n Barth						
	Nathan	n Barth Printed Name		Date				
Authorized Signature	Nama	Printed Name Printed Name Printed Name Printed Name	State of Missouri	Date Date				
Authorized Signature Authorized Signature Authorized Signature Name and address to return filed	document:	Printed Name Printed Name Printed Name Printed Name		Date Date				
Address:	document:	Printed Name Printed Name Printed Name Printed Name	State of Missouri	Date Date				

JPMorganChase 🗘

September 11, 2006

To Whom It May Concern,

JP Morgan Chase, located at 9300 Ward Parkway in Kansas City, Missouri, 64114 is assuming the servicing of certain clients of American Century Services. It is important that our JPMC Retirement Planning Services telecommunications needs in the Kansas City area be properly supported.

AT&T does not currently have the desired telephone numbers to support our telecommunications needs. We are therefore requesting telephone numbers consisting of the following four thousands-blocks: 2000-2999; 3,000-3,999; 4,000-4,999; and 7,000-7,999, all within in the Kansas City (816) area code. It is important that all four blocks of numbers have same NXX.

AT&T is our telecommunications provider of choice, and we understand that AT&T might have to escalate this request to the public utility commission. We appreciate any efforts that can be made to expedite the handling of our request, so that these numbers can be activated by not later than October 10, 2006.

Thank you,

Cyntala S. Davis
JP Morgan Chase

Global Technology Infrastructure

Voice Network Engineer

317-321-8142

TBPAG Attachment 1	- November 21,	2003
	ATIS-03000	66 at1

Tracking Number: ____

Thousands-Block Application Form Part 1A

Type of Application (check one):	X New	□ Change ⁱ	□ Disconnect					
GENERAL APPLICATION INFORMATION								
1.1 Contact Information:								
Block Applicant: Company Name: SOUTHWESTERN BEI Headquarters Address: 2600 CAMINO RA Contact Name: LOURDES PANOPIO Contact Address: 2600 CAMINO RAM Phone: 925-823-9276 Fax: 925-355-9268 E-Mail: lp1721@att.com	MON City SAN		-					
Pooling Administrator ⁱⁱ : Contact Name: GENEVIEVE PAULINO Contact Address: 1800 SUTTER STREET Phone: 925-363-7653 Fax: 925-363-7686 E-Mail: genevieve.paulino@neustar.com	7, Suite 571 City	CONCORD State C A	A Zip <u>94520</u>					
1.2 General Information								
Check one: No LRN needed X	_ LRN needed ⁱⁱⁱ							
NPA: 816 LATA: 524 OCN ^{iv} : 9533 Parer Number of Thousands-Blocks Requested: 4		EN <u>9533</u>						
Switch Identification (Switching Entity/POI Rate Center ^{vi} : KANSASCITY Rate Center								
1.3 Dates								
Date of Application ^{vii} : <u>08/21/06</u> Requ Request Expedited Treatment? (See Section								
1.4 Type of Service Provider Requesting	the Thousands-	Block:						
a) Type of Service Provider: <u>ILEC</u> b) Primary type of service Blocks to be c) Thousands-Block(s) (NXX-X) assig <u>customer</u> , <u>JP Morgan Chase Bank</u> . d) Thousands-Block(s) (NXX-X) that a e) If requesting a code for LRN purpose be given to the pool)	nment preference are undesirable for es, indicate which	INE (optional) 816-xxx-200 r this assignment, if any						
-								
1.5 Type of Request								

Tracking Number: ____ TBPAG Attachment 1 – November 21, 2003 ATIS-0300066.at1

Thousands-Block Application Form Part 1A

nitial 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	, If Yes, attach months to exhaus	st worksheet							
Change block: Yes, If Yes, indi-	cate NPA-NXX-X, type of and reas	son for change:							
Disconnect block: Yes, If Yes, l	ist NPA-NXX-X								
I hereby certify that the above informathat this application has been prepared INC 99-0127-023	1 0		•						
SIGNATURE ON FILE Signature of Block Applicant	DATA ADMINISTRATOR Title	August 21, 2006 Date							

Tracking Number: ____ TBPAG Attachment 1 – November 21, 2003
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

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.
- 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 TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider viii. 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. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also 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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: ____ TBPAG Attachment 1 – November 21, 2003
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Thousands-Block Application Form Part 1A

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.6.

ii The Pool Administrator is available to assist in completing these forms.

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

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).

^v 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 CLLITM code of the switch /POI.

vi Rate 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 Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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

Date: 08/21/06 OCN: 9533 Company Name: SOUTHWESTERN BELL

Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX: 151; NPA/NXX-X: 379

Name of Block Applicant: CONNIE MC NAUGHTON Signature: SIGNATURE ON FILE

Title: MANAGER CODE ADMINISTRATOR Telephone No.: 925-824-5627 FAX No.: 925-355-9268

E-Mail: cm3123@att.com

A. Available numbers: 342254

B. Assigned numbers: 837005

C. Total Numbering Resources: <u>1358797</u>

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None

List excluded Code(s) or Block(s): None

		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 ²	<u>-5789</u>	<u>6148</u>	<u>0</u>	<u>426</u>	<u>-3231</u>	<u>-692</u>						
F.	Forecast – Next 12 months ³	<u>464</u>	<u>5401</u>	<u>2013</u>	<u>1034</u>	<u>1754</u>	<u>489</u>	<u>1950</u>	<u>1721</u>	<u>735</u>	<u>1807</u>	<u>2706</u>	2097
G.	G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 1859.167												
H.	Months to Exhaust ⁴	<u>N</u>	umbers A		or Assignm Monthly Fo			<u>A)</u>	=	184.090			
l.	Utilization ⁵		<u>gned Num</u> Iumbering	Resource				* 100	=	61.599%	<u>′o</u>		

Explanation: K-Block Assignment Preference: 816-xxx-2000-4999, 7000-7999. For Dedicated Customer, JP Morgan Chase Bank. Requesting for an Expedite

Effective Date.

copy of this document.

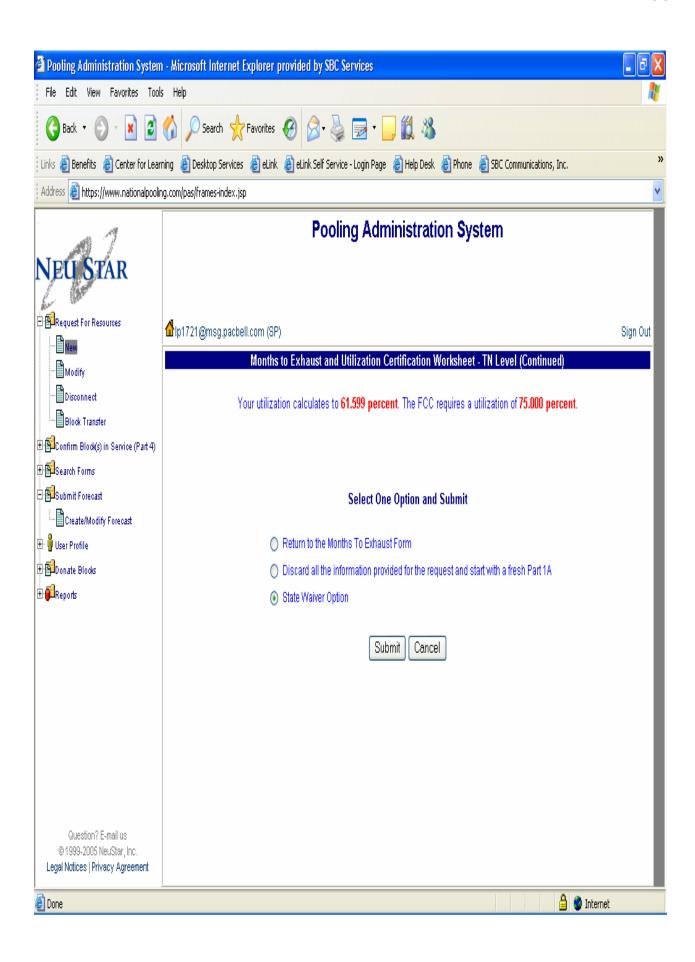
¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a

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))



47 C.F.R § 52.15(g)(3)(iv):

The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an OCN. The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.