



at&t

February 2, 2024

Jimarli Figueiredo  
New Jersey Board of Public Utilities  
44 S. Clinton Avenue, 2<sup>nd</sup> Floor West  
P.O. Box 350  
Trenton, New Jersey 08625

Re: Safety Valve Request for Teleport Communications America, LLC.

Dear Mr. Figueiredo:

Teleport Communications America, LLC. (TCAL) submits this application to the New Jersey Board of Public Utilities (BPU) to: (1) grant TCAL "safety valve" relief from North American Numbering Plan Association ("National Pooling Administrator" or "NPA") of TCAL's application for telephone numbers (2) authorize and direct the NPA to release the numbers to TCAL to serve our customer and (3) protect the proprietary/confidentiality provided under Board Rules, Orders and New Jersey law. 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"), as well as the Board's Rules, Orders and New Jersey law.

Our customer is requesting 3,000 consecutive numbers in the Pennington rate center<sup>1</sup>. Our customer plans to expand their current location, and the phone system will not accept numbers beginning with 7 or 9 in the 609 NPA. The customer will activate the numbers as soon as they are made available to them.

On January 8, 2024, TCAL submitted a "Thousand Block Application Form Part 1A, and a "Months-to-Exhaust and Utilization Certification Worksheet – TN Level" ("MTE and Utilization") to the NPA<sup>2</sup> for 3 blocks in the Pennington rate center. The Pooling Administrator denied the request, stating: "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 3A denial."<sup>3</sup> The NPA applies the FCC rules and INC Guidelines which require that the block holder requesting growth resources demonstrates that the existing resources will exhaust within 6 months AND meet the 75% utilization level. The month-to-exhaust and the utilization thresholds were not met.

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<sup>1</sup> AT&T considers the customer's name proprietary and trade secret information. Accordingly, AT&T asks that the Commission not reveal the name of the customer beyond these discussions. See attached Company-Proprietary customer letter.

<sup>2</sup> A copy of the Part 1A and MTE worksheet are attached. AT&T asks the Commission to treat the information contained in these documents as confidential.

<sup>3</sup> A copy of the Pooling Administrator's response is attached. AT&T asks the Commission to treat the information contained in the request and response as confidential.

AT&T requests that the BPU overturn the NPA's decision in the interest of our customer, as we are unable to satisfy their need without an exception. Any correspondence with the NPA in this matter may be brought to the attention of the Pooling Administrator responsible for the geography in question:

Patricia Soderland  
Pooling Administrator  
NANPA, Inc.  
Two Tower Center Blvd., 20<sup>th</sup> floor  
East Brunswick, NJ 08816  
Phone: 571-363-3828  
E-Mail: pscoderland@nanpa.com

Respectfully submitted,



Wendy Scott  
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**CONFIDENTIAL ATTACHMENTS**

**REDACTED**