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June 12 2023

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334-5701

Dear Ms. Tanner,
This letter requests the Commission's review of the NANPA recent denial of Teleport Communications of Georgia, LLC (AT&T) application for use of numbering resources in the Lagrange rate center. AT&T respectfully requests that the Commission consider this request on an expedited basis. [1]

On December 28, 2001, the FCC issued its most recent numbering order ("the Order") in the Numbering Resource Optimization docket (Docket 99-200). Among other things the Order established a "Safety Valve" mechanism. This mechanism was designed to address situation in which carriers need additional numbers but cannot meet the rate center based on the utilization and months-to-exhaust (MTE) thresholds. The FCC noted that conditions that might give rise to a need for such numbers "might include situations where a carrier has multiple switches with a rate center, but it is unable to readily share numbering resources among the switches". Order para 58. The FCC delegated authority to state commissions "to hear claims that a safety valve should be applied when the NANPA or Pooling Administrator denies a specific requires for numbering resources." Order, para 61. Moreover, the FCC rules that "states may grant requests by carriers that receive a specific customer request for numbering resources that exceed their available inventory."

When considering a request, the FCC explained that "states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in each rate center that it cannot meet with its current inventory. Carriers must demonstrate the need by proving the state with documentation of the customer request and current proof of utilization and MTE calculations for the rate center. States may not accommodate requests for specific numbers (ie: vanity numbers) but may grant requests for customers seeking contiguous blocks of numbers." Order, para 65. Finally, recognizing that failure to address a

[1] Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration," *see, e.g.,* 47 C.F.R. §52.15, and the FCC's Orders addressing these matters allow for challenges of determinations by both entities. *See* Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*"). Accordingly, this Letter addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so.

request for additional numbering resources can negatively impact carriers, the FCC directed states to act on carriers request for a safety valve "as expeditiously as possible."

On February 24, 2023, AT&T submitted a Central Office Code Assignment Request to NANPA for 5000 numbers, in the 706 & 762 area code, for Wellstar Health System, to be served by the Lagrange rate center. These numbers will support the B-VoIP at the Wellstar West Georgia Hospital.

AT&T submitted this request because it did not have 5000 numbers in the Lagrange rate center, as requested by Wellstar Health System, to maintain a 5-digit dialing pattern to be in blocks 5 and 6. Also, the 3$^{\text{-digit}}$ in the NXX cannot be a 0 or 9. AT&T owns 706-443-7 and 762-888-1 with ~865 available numbers amongst the blocks. The rate center utilization calculation indicated that the Lagrange rate center utilization was 53.75% which is out of MTE utilization scope. AT&T's inability to meet the Wellstar Health System request is since AT&T does not meet the utilization requirement in the Lagrange rate center. A new NPA-NXX will need to be opened to accommodate the request.

AT&T requests that the Commission review the NANPA's decision and grant its "Safety Valve" request. Specifically, AT&T respectfully asks that the Commission order NANPA to provide numbers to meet Wellstar West Georgia Hospital request outlined herein. There are currently 5 consecutive blocks in the industry pool supporting this request. Supporting information documenting AT&T's request to NANPA and NANPA's denial is attached for your information and review.

We are available to answer any questions you may have, and we appreciate your consideration.

Thank you,

Rich Johnson
Assistant Vice President – Legislative & Regulatory Affairs
AT&T Georgia

Copy to: Mr. Leon Bowles
Mr. Patrick Reinhardt

2/15/2023

Wellstar Health System
793 Sawyer Road
Marietta, GA

TNAC:

Please accept this Letter of Intent requesting additional numbering resources. Wellstar requests 5,000 consecutive numbers in the LAGRANGE GA rate center. Reference address 1514 Vernon Rd LaGrange, GA 30240. Service Type: BVOIP.

Wellstar is nationally ranked and locally recognized for our high-quality care, inclusive culture, and exceptional doctors and caregivers, Wellstar Health system is one of the largest and one of the most integrated healthcare systems in Georgia. Our state-of-the-art facilities include:

- 10 hospitals
- 300+ medical office locations
- 9 cancer centers
- 55 rehabilitation centers
- 3 hospice facilities
- 1 retirement village
- 21 imaging centers
- 15 urgent care locations
- 5 health parks

We are upgrading Wellstar West Georgia Hospital and would like to convert them to our current B-VoIP platform. We are also building a new Health Park in the Lagrange area that will need numbers.
The hospital is currently utilizing MetTel as a service provider and we would like to change the provider to AT&T. The phone system will not accept blocks beginning with 0, or 9. Our goal is to maintain a 5-digit dialing pattern, and therefore we are requesting the 5,000 consecutive numbers to be in blocks 5 and 6. (example xxx-xxY-xxxx with Y not being a 0 or 9) Wellstar is hoping to activate these numbers as quickly as possible. Given this is an upgrade/replacement project we will not be returning our existing numbers as they belong to MeTel. We will port the main hospital numbers from MetTel to AT&T. We have recently installed AT&T Circuit ID: /IUEC/841886//ATI/ in preparation for the hospital phone system upgrade.

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

Junior Cook 2/28/2023

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