

July 14, 2017

INDIANA UTILITY

REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION)	
OF COMMUNICATIONS)	
CORPORATION OF SOUTHERN)	CAUSE NO. 44966
INDIANA D/B/A TDS TELECOM FOR)	
ASSIGNMENT OF AN NXX CODE IN THE)	
812 NUMBERING PLAN AREA)	

EMERGENCY PETITION FOR ALLOCATION AND ASSIGNMENT OF NXX CODE

Communications Corporation of Southern Indiana d/b/a TDS Telecom (“CCSI”), by counsel, respectfully requests that the Indiana Utility Regulatory Commission (“IURC” or “Commission”) on an expedited basis direct NeuStar, Inc. Pooling Administrator (“NeuStar” or “PA”) to assign numbering resources, as described herein, to fill needs that exceed CCSI’s available inventory. CCSI’s request is made pursuant to 47 C.F.R. § 251(e)(1), the Federal Communications Commission (“FCC”) “safety valve” mechanism announced *In the Matter of Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, released December 28, 2001 (“*Third Report & Order*”), and the IURC’s General Administrative Order (“GAO”) 2011-3, approved November 9, 2011.

Numbering Request

CCSI intends to install a state of the art switching system in Poseyville, Indiana within approximately six (6) months of the date of this Petition, which is planned to replace its legacy switch in its entirety within approximately five (5) years of its installation. The new switching system is required for the Digital Loop Carrier sites that CCSI intends to deploy in 2018, which will provide faster DSL internet speeds for CCSI’s customers. In order to conduct an orderly

transition to this new platform and make this significant financial investment in Indiana, CCSI requires the use of numbering resources, specifically a Local Routing Number (“LRN”), that will allow these switches to coexist with the legacy equipment. Specifically, CCSI will use porting to migrate customers from its legacy switch to the new switching system. Upon completion of this migration, CCSI will begin decommissioning the legacy switch, including moving the NXX code and LRN associated with legacy switch to the new switching system. At that time, CCSI will be able to return the NXX code requested by this Petition to the North American Numbering Plan Administration (“NANPA”) pool for reuse elsewhere in the state.

CCSI is requesting a full NXX code and will retain all ten (10) blocks to prevent contamination and assignment of numbers within the NXX code. CCSI will only use numbers for LRN and testing purposes and will ensure all other numbers are blocked in order to ensure a smooth relinquishment of the assigned NXX code upon the decommissioning of CCSI’s legacy switch. This will prevent other blocks within the assigned NXX code from being assigned to other carriers and will ensure the NXX code can be repurposed in the future. CCSI has requested that the NXX code be made available by January 14, 2018.

Consequently, CCSI requested these numbering resources from NeuStar. However, CCSI’s request was denied because CCSI does not currently meet the FCC’s Months to Exhaust (“MTE”) criteria and/or utilization requirements in the Poseyville rate center.

FCC Criteria

The FCC’s rules require that carriers meet a two-pronged test for eligibility for additional numbering resources.¹ First, carriers must maintain no more than a six-month inventory based on a forecast. CCSI calculated its MTE at 2,688.8 months. The second prong of the test requires that carriers utilize a minimum of 75 percent of its existing inventory. CCSI does not meet this

¹ See 47 C.F.R. § 52.15(g)(3)(B)(iii).

criterion as its current utilization rate is 11.2 percent. On June 2, 2017, CCSI submitted a Thousand Block Application Form Part 1A (“Part 1A”) and a Months to Exhaust and Utilization Certification Worksheet - TN Level (“MTE and Utilization”) to the PA using the Pooling Administration System (“PAS”).² With these documents, CCSI requested a full NXX code in the Poseyville rate center. Following submission of these documents, CCSI received, via PAS, a denial of its request indicating the request was denied because CCSI did not meet the MTE and/or utilization requirements and that CCSI must seek a state waiver from the Commission to proceed.³

Additional Criteria

The IURC has considered additional criteria when evaluating “safety valve” requests:

- (a) Is the requested relief reasonable considering the projected need?
- (b) Has the petitioner thoroughly examined all alternatives available to satisfy the projected need?
- (c) Has the petitioner demonstrated a good-faith effort to participate in the program to conserve numbering resources?⁴

These criteria are addressed below.

First, the requested relief is reasonable given CCSI’s need for additional numbering resources while replacing its legacy switches with a new platform. These additional numbering resources will allow the legacy switches and new platform to coexist during the equipment migration. CCSI’s current inventory does not contain numbers that meet this need. To complete this project, CCSI needs an NXX code that does not have an LRN tied to it, as only one LRN per

² Copies of the Part 1A and MTE and Utilization worksheet are attached as Attachment A and B, respectively.

³ A copy of the PA’s denial is attached as Attachment C.

⁴ GAO 2011-3; *See In the Matter of the Petition of Indiana Bell Telephone Company, Inc. for Assignment of 1,000 Block NXX Codes in the 317 NPA*, Cause No. 42917, Ind. PUC LEXIS 359 (November 9, 2005).

NXX code can exist. The only NXX code currently assigned in the Poseyville rate center is 812-874, and CCSI is already using the LRN associated with this NXX code for its legacy switch. Second, CCSI has thoroughly examined all alternatives available to satisfy the projected need. CCSI checked whether it had the necessary resources in the Poseyville rate center to satisfy this need. As indicated, CCSI does not have sufficient inventory to meet its needs. CCSI also checked whether it held any blocks in the Poseyville rate center that could be exchanged for a block in the pool, as permitted by industry guidelines. However, CCSI does not have any blocks that are eligible for donation for the Poseyville rate center. In addition, CCSI has generally demonstrated good-faith participation in the program to conserve numbering resources and will continue to do so by returning the requested NXX code to NANPA upon completion of this project. While CCSI efficiently utilizes numbers in the Poseyville rate center and makes substantial efforts to conserve numbering resources, as a last resort it must invoke the FCC's "safety valve" procedures in order to meet its needs.

In conclusion, although CCSI has an adequate supply of telephone numbers to satisfy incremental requests for numbers without receiving a new block of numbers, its inventory cannot satisfy CCSI's code-specific need. CCSI respectfully requests that the Commission direct the PA to assign numbering resources, as described herein.

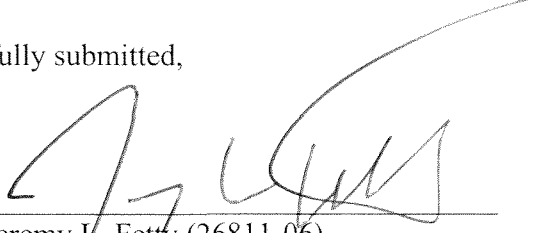
Relief Requested

WHEREFORE, Communications Corporation of Southern Indiana d/b/a TDS Telecom requests that the Commission direct the Pooling Administrator, NeuStar, Inc., to grant Communications Corporation of Southern Indiana d/b/a TDS Telecom's original request for the numbering resources described herein of a full NXX code in the Poseyville rate center, as necessary to meet the needs of CCSI and for other necessary relief.

Dated:

Respectfully submitted,

By



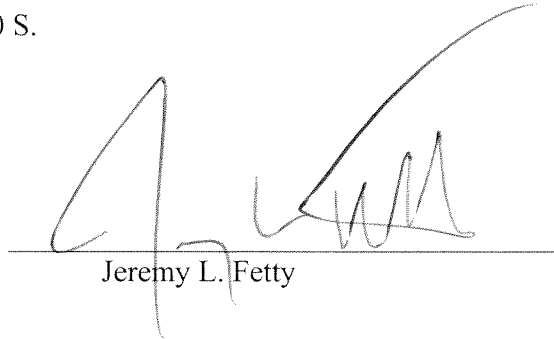
Jeremy L. Fetty (26811-06)
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aboling@parrlaw.com

Attorneys for Petitioner, Communications
Corporation of Southern Indiana d/b/a TDS
Telecom

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following electronically this 14th day of July, 2017.

Office of Utility Consumer Counselor
115 W. Washington Street, Ste. 1500 S.
Indianapolis, IN 46204
infomgt@oucc.in.gov



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ATTACHMENTS

- A. Numbering Resources Request Form (Part 1 and/or Part 1A)
- B. Months to Exhaust and Utilization Certification Worksheet - TN Level
- C. Documentation of Numbering Request Denial by Numbering Resources Administrator
- D. Documentation demonstrating verifiable need for additional numbering resources (e.g. Customer Request Letter)
- E. A customer's utilization plan for the numbers requested (i.e. number of phone lines, number of offices, hospital beds, expansion plans), if a customer will receive numbers as a result of the safety valve process
- F.-H. Certifications
- I. Verification

ATTACHMENT A

Tracking
Number: **812-POSEYVILLE-IN-1022632**

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

Full NXX: LRN

Type of
Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company
Name: **COMMUNICATIONS CORP. OF SOUTHERN INDIANA**

Headquarters
Address: **525 Junction Road**

City: **Madison** State: **WI** ZIP: **53717**

Contact
Name: **Anne Chism**

Contact
Address: **525 Junction Road**

City: **Madison** State: **WI** ZIP: **53717**

Phone: **608-824-0266** Fax:

E-mail: **anne.chism@tdstelecom.com**

Pooling Administrator:ⁱⁱ

Contact
Name: **Agnes Rom**

Contact
Address: **1800 Sutter St**

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

Phone: **925-363-7650** Fax: **925-363-7681**

E-mail: **agnes.rom@neustar.biz**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: **X**

NPA: **812** LATA: **330** OCN^{iv}: **0809** Parent Company's
OCN **0881**

Number of Thousands-Blocks Requested : **10**

Switch Identification (Switching
Entity/POI^v): **POVLINXAGT0**

Rate Center^{vi}: **POSEYVILLE**

1.3 Dates:

Date of Requested Effective
Application^{vii}: **06/20/2017** Date^{viii}: **12/20/2017**

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) **812-900**
- 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) **812-xxx-0,812-xxx-1,812-xxx-2,812-xxx-3,812-xxx-4,812-xxx-5,812-xxx-6,812-xxx-7,812-xxx-8,812-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^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ 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) or by contacting inc@atis.org as of the date of this application.

Anne Chism

Sr. Administrator - Number
Management

06/20/2017

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 (iconectivTM) LERGTM Routing Guide^{xi}. 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 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:

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

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

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

^{iv}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).

^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 /POL.

^{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}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.

^xSelect 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.

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

Revised: January 4, 2016

Tracking
Number: **812-POSEYVILLE-IN-1022632**

Full NXX: LRN

Type of
Application: ☒ New ☐
Change¹ ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Ent
ity Name: **COMMUNICATIONS CORP. OF SOUTHERN INDIANA**

Headquarters
Address: **525 Junction Road**

City, State,
Zip: **Madison, WI, 53717**

Contact
Name: **Anne Chism**

Contact
Address: **525 Junction Road**

City: **Madison** State: **WI** ZIP: **53717**

Phone: **608-824-0266** Fax :

E-mail: **anne.chism@tdstelecom.com**

Code Administrator:²

Name: **Patricia Soderland**

Address: **21575 Ridgetop Circle**

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

Phone: **571-434-5348** Fax : **571-434-5502**

1.2 NPA: **812** NXX:³ **330** LATA: **0809** Parent Company's
OCN:⁴

OCN(s) 0881

Switching Identification (Switching Entity/POI)

⁵POVLINXAGT0

Locality/City/Wire Center: POSEYVILLE

Rate

Center: ⁶POSEYVILLE

Homing Tandem Operating Co.: ⁷AMERITECH
INDIANA

Tandem Homing
CLLI^{TM8}: EVVLIN0311T

1.3 Dates

Date of Application: 06/20/2017

Requested Effective

Date: ^{9,10}

0/2017

12/2

☐ 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) **812-900**

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem
Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservations

1.5 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: ¹³☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service

(Explain): _____

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

Comments:

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 application¹⁴.

Anne Chism

Signature of Code Applicant

**Sr. Administrator - Number
Management**

Title

**06/20/2
017**

Date

¹Identify type and reason for change(s) in Section 1.4(e).

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

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

⁴Operating 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 TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵This 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[®] Location Code (CLLI[™] Code) of the applicant's switch or POI. Common Language[®] and Telcordia[®] are registered trademarks and CLLI[™], LERG[™] Routing Guide and iconectiv[™] are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

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

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI[™] Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code 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.

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

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The 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.

¹⁴An incomplete form may result in delays in processing this request.

ATTACHMENT B

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

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET -
TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **812-POSEYVILLE-IN-1022632**

Date: **Tuesday, June
20, 2017**

OCN: **0809**

Company Name: **COMMUNICATIONS
CORP. OF SOUTHERN INDIANA**

Rate Center: **POSEYVILLE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **812-874-0,2,3,5,8**

Name of Block Applicant: **Anne
Chism**

Signature: **Anne Chism**

Title: **Sr. Administrator - Number Management**
Fax: -

Phone: **608-824-0266-**

E-Mail: **anne.chism@tdstelecom.com**

A. Available Numbers: **4444**

B. Assigned Numbers: **556**

C. Total Numbering Resources: **5000**

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) **n/a**
or
Block(s):

Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont	Mont
h	h	h	h	h	h	h	h	h	h	h	h	h
1	2	3	4	5	6	7	8	9	10	11	12	

E.
Growth
History -
Previous
6 months⁴

<u>4</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>3</u>	<u>2</u>							
----------	----------	----------	----------	----------	----------	--	--	--	--	--	--	--

F.
Forecast -
Next 12
months⁵

<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):5.0

H.
Months
to
Exhaust⁶
=

Numbers Available for Assignment
to Customers (A)

Average Monthly Forecast (G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	4444	888.80
2	5444	1088.80
3	6444	1288.80
4	7444	1488.80
5	8444	1688.80
6	9444	1888.80
7	10444	2088.80
8	11444	2288.80
9	12444	2488.80
10	13444	2688.80

I.
Utilization⁷ =

Assigned Numbers (B) X 100 = 11.12

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

Explanation: _____

¹A 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.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity 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).

⁴Net 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.

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

⁶To 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)).

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

ATTACHMENT C

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 812-
POSEYVILLE-IN-
1022632

Date of Application: 06/20/2017 Effective Date: _____

Date of Receipt: 06/20/2017 Date of Response: 06/20/2017

Service Provider Name: COMMUNICATIONS CORP. OF SOUTHERN INDIANA

(LERGTM Routing Guide¹) OCN: 0809

Parent Company OCN: 0881

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Agnes Rom Phone: 925-363-7650

Signature of Pooling Administrator

Agnes Rom Fax: 925-363-7681

Name (print)

Email: agnes.rom@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): _____

Switch Identification (Switching/POI)²: **POVLINXAGT0**

Rate Center: **POSEYVILLE**

× 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:

¹ Telcordia[®] is a registered trademark and LERG[™] Routing Guide and iconectiv[™] 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 (CLLI[™] 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.

ATTACHMENT D

The instant request is required to establish a new Local Routing Number and is not associated with a specific customer request.

ATTACHMENT E

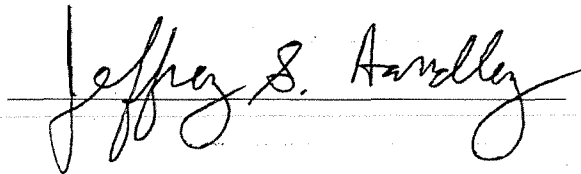
The instant request is required to establish a new Local Routing Number and is not associated with a specific customer request.

ATTACHMENTS F, G, H

- F. Communications Corporation of Southern Indiana d/b/a TDS Telecom (“CCSI”) is able and willing to return any uncontaminated blocks or codes in exchange for the requested numbers. CCSI does not currently have any uncontaminated blocks.
- G. The requested numbering resources will be used only for the purposes outlined in this Petition. If any of the numbering resources (e.g. thousand-blocks) associated with the request are not utilized for the purposes set forth in the petition, CCSI will return/donate those numbering resources (e.g. thousand-blocks) back to the Numbering Administrator (e.g. Pooling Administrator).
- H. The numbering resources will be used within 18 months of the Commission’s Order, and CCSI will return/donate any uncontaminated (less than 10 percent utilized) thousand-blocks or unused NXX codes back to the Numbering Administrator (e.g. Pooling Administrator).

ATTACHMENT I

I, Jeffrey S. Handley affirm under penalties of perjury that I am employed as Manager State Government Affairs by Communications Corporation of Southern Indiana d/b/a TDS Telecom; that I have read the foregoing *Emergency Petition for Allocation and Assignment of NXX Code* and know the contents thereof; and that the statements and representations therein contained are true to the best of my knowledge, information, and belief.

A handwritten signature in black ink, reading "Jeffrey S. Handley", is written over a horizontal line. The signature is cursive and stylized, with the first letters of each name being capitalized and prominent.