

January 19, 2017

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JAN 19 2017

PUBLIC SERVICE
COMMISSION

Mark R. Overstreet
(502) 209-1219
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moverstreet@stites.com

HAND DELIVERED

Dr. Talina R. Mathews
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Case No. 2017-00043

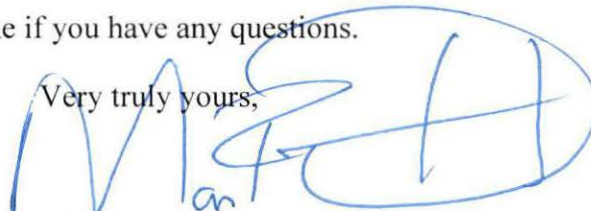
RE: Petition of Windstream Kentucky East, LLC

Dear Dr. Matthews:

Please find enclosed and accept for filing the original and ten copies of Windstream Kentucky East, LLC's petition to overturn the National Pooling Administrator's decision and to grant Windstream Kentucky East, LLC the requested numbering resources.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Mark R. Overstreet

MRO

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

JAN 19 2017
PUBLIC SERVICE
COMMISSION

In the Matter of:

Windstream Kentucky East, LLC’s Petition for
Commission Review and Reversal of a Decision) Case No. 2017- 00 043
of the North American Number Pooling)
Administration)

PETITION FOR REVIEW, APPLICATION FOR GRANT OF NUMBERING RESOURCES,
AND REQUEST FOR EXPEDITED TREATMENT

Windstream Kentucky East, LLC, (“Windstream”) petitions the Public Service Commission of Kentucky (“Commission”) pursuant to 47 C.F.R. § 52.15(g)(4) to review and overturn a recent decision by the Pooling Administrator (“PA”) to withhold certain numbering resources from Windstream required by the company to meet the needs of a particular customer in Lexington, Kentucky. In support of its Petition Windstream states:

Windstream’s Application And PA’s Denial

1. On January 17, 2017, Windstream filed a request with the PA for ten “thousands” block of numbers for a LRN for a new packet switch to serve a customer in Windstream’s Lexington rate center. A copy of the Application is attached as EXHIBIT 1.

2. The additional numbering resources have been requested by a large business customer that uses a DID arrangement and is undergoing a technology project to unify its systems. Attached as EXHIBIT 2 is a copy of a letter from the customer explaining its need for the numbering resources requested by Windstream.

3. On January 17, 2017, the PA denied Windstream’s request on the grounds that Windstream had not satisfied the months-to-exhaust (“MTE”) criteria established in the Central Office Code Assignment Guidelines. A copy of the PA’s denial is attached as EXHIBIT 3.

4. Windstream has demonstrated a verifiable need as Windstream will be unable to meet the needs of this large customer.

5. Windstream cannot satisfy the need for numbering resources from its current inventory or in any other manner and has exhausted all other available remedies.

Basis For Commission Review And Action

6. Under federal numbering rules, a state commission may overturn the PA's decision based on the determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹

7. In its Third Report and Order in the Number Resource Optimization proceeding, the Federal Communications Commission ("FCC") found that "a carrier should be able to get additional number resources when there is verifiable need due to the carrier's inability to satisfy a specific customer request."² Thus, the Commission has the authority to overturn the PA's decision in this matter.

8. As set forth above, Windstream has demonstrated a verifiable need due to the need of a specific customer. In other cases, the Commission has granted the requested numbering relief despite the PA's determination that the carrier did not meet the MTE or utilization thresholds.³

¹ 47 C.F.R. § 52.15(g)(4)

² *Number Resource Optimization*, Third Report and Order and Second Order on Reconsideration, FCC 01-362, 17 FCC Rcd 252, ¶ 64 (2001) ("*Third Report and Order*").

³ *See*, Order, Case No. 2016-00209 (Ky. P.S.C. July 8, 2016); Order, Case No. 2016-00194 (Ky. P.S.C. June 16, 2016); Order, Case No. 2015-00323 (Ky. P.S.C. October 16, 2015); Order, Case No. 2015-00157 (Ky. P.S.C. June 4, 2015); Order, Case No. 2015-00114 (Ky. P.S.C. April 29, 2015); Order, Case No. 2015-00092 (Ky. P.S.C. April 6, 2015); Order, Case No. 2014-00032 (Ky. P.S.C. March 20, 2014); Order, Case No. 2013-00375 (Ky. P.S.C. November 6, 2013); Case No. 2013-00358 (Ky. P.S.C. November 6, 2013.)

9. Granting Windstream's Petition 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.

Request For Expedited Treatment

10. Windstream respectfully requests that the Commission act upon this Petition within ten business days. Expedited treatment is required to meet the needs of the persons to be served through the switch and Windstream's internal business plans and schedule.

11. The FCC also has recognized the importance of timely action:

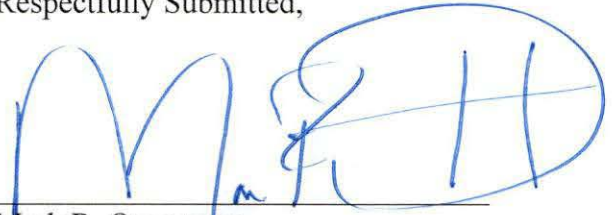
[W]e recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier's ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish 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 the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.⁴

Therefore, Windstream respectfully requests that the Commission:

1. Overturn the Pooling Administrator's decision;
2. Direct the PA to grant Windstream's requests for numbering resources; and
3. Enter its Order doing so within ten business days, or as soon thereafter as is possible; and
4. Grant Windstream such further relief as may be appropriate.

⁴ *Third Report and Order* at ¶66.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'M. R. Overstreet', is written above a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
(502) 223-3477

COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

EXHIBIT 1

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

Revised: January 4, 2016

Tracking
Number: **859-LEXINGTON-KY-975980**

**Full NXX: Dedicated
Customer**

Type of
Application: **New**
Change¹
Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
Name: **WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON**

Headquarters
Address: **301 N Main St**

City, State, Zip: **Greenville, SC, 29601**

Contact Name: **Kerry Flury**

Contact
Address: **301 N Main St**

City: **Greenville** State: **SC** ZIP: **29601**

Phone: **864-672-5376** Fax :

E-mail: **kerry.flury@windstream.com**

Code Administrator:²

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: **859** NXX:³ LATA: **466** OCN:⁴**9690**

Parent Company's OCN(s) **G118**

Switching Identification (Switching Entity/POI)

⁵**LXTNKYXAPS2**

Locality/City/Wire Center:

Rate

Center:⁶**LEXINGTON**

Homing Tandem Operating Co.⁷: At&TTandem Homing
CLLI^{TM8}: LXTNKYXA01T1.3 Dates

Date of Application: 01/17/2017 Requested Effective Date:^{9,10} 03/24/2017 -

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

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-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.

<u>Kerry Flury</u>	<u>Code Administrator</u>	<u>01/17/2017</u>
Signature of Code Applicant	Title	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 Telcordia™ 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 (CLLITM Code) of the applicant's switch or POI. 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.

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 CLLITM 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.

Tracking Number: **859-LEXINGTON-KY-975980**

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

Full NXX:
Dedicated
Customer

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON**
Headquarters Address: **301 N Main St**
City: **Greenville** State: **SC** ZIP: **29601**
Contact Name: **Kerry Flury**
Contact Address: **301 N Main St**
City: **Greenville** State: **SC** ZIP: **29601**
Phone: **864-672-5376** Fax:
E-mail: **kerry.flury@windstream.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Genevieve Bettiga**
Contact Address: **1800 Sutter St**
City: **Concord** State: **CA** ZIP: **94520**
Phone: **925-363-7652** Fax: **925-363-7683**
E-mail: **genevieve.bettiga@neustar.biz**

1.2 General Information:

Check one : No LRN needed LRN neededⁱⁱⁱ:

NPA: 859 LATA: 466 OCN^{iv}: 9690 Parent Company's OCN G118

Number of Thousands-Blocks Requested : 10

Switch Identification (Switching Entity/POI^v):
LXTNKYXAPS2

Rate Center^{vi}: LEXINGTON

1.3 Dates:

Date of Application^{vii}: 01/17/2017 Requested Effective Date^{viii}: 03/24/2017

Requested Expedited Treatment? (See Section 8.6) Yes No

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) N/A

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 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.

<u>Kerry Flury</u>	<u>Code Administrator</u>	<u>01/17/2017</u>
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™) LERG™ 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 iconectiv™ 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 /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} 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.

^x Select 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.

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: **859-LEXINGTON-KY-975980**Date: **Tuesday, January 17, 2017** OCN: **9690** Company Name: **WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON**Rate Center: **LEXINGTON**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **859-218, 859-219, 859-223, 859-224, 859-225, 859-226, 859-231, 859-232, 859-233, 859-243, 859-244, 859-245, 859-246, 859-252, 859-253, 859-254, 859-255, 859-257, 859-257, 859-258, 859-259, 859-260, 859-263, 859-264, 859-266, 859-268, 859-269, 859-271, 859-272, 859-273, 859-275, 859-276, 859-277, 859-278, 859-280, 859-281, 859-288, 859-290, 859-293, 859-294, 859-296, 859-299, 859-313, 859-323, 859-335, 859-357, 859-367, 859-373, 859-381-0,1,2,3,4,5,6,8,9, 859-388-1,3,5,6,7,8,9, 859-389, 859-425, 859-455-0,3,4,5,7,8,9, 859-543, 859-566, 859-639, 859-705-0, 859-892-859-971**

Name of Block Applicant: **Kerry Flury**Signature: **Kerry Flury**Title: **Code Administrator**Phone: **864-672-5376-**

Fax:

E-Mail: **kerry.flury@windstream.com**A. Available Numbers: **188007**B. Assigned Numbers: **361040**C. Total Numbering Resources: **565000**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) or
Block(s):

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

E. Growth
History -
Previous 6
months⁴ 864 -294 -258 -872 -650 -2254

F. Forecast
- Next 12
months⁵ -577 -606 -636 -668 -702 -737 -774 -812 -852 -896 -940 -987

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): -654.333

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	188007	-287.326

I.
Utilization⁷ Assigned Numbers (B) X 100 = 63.901
=
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))

EXHIBIT 2

122 James F. Hardymon Building
Lexington, Kentucky 40506-0495
Office: 859-257-3609
Fax: 859-323-1025

December 8th, 2016

Windstream,

This Letter of Intent represents a request by the University of Kentucky to reserve a contiguous block of 10,000 new DIDs on the current Windstream account 161806927. UK intends to activate these numbers within 30 days from receipt of the numbers. The business purpose for adding an entire NXX is due to a UK Healthcare implementation of a technology project which will attempt to unify all mobile communications devices onto a single platform. As a result the total end user device count will increase significantly past the current DID range surplus. The initial rollout will consume 3,000 DIDs with subsequent phases adding additional demands for PSTN dialable numbers.

The UK dial plan currently contains the 10,000 number DID blocks of:

- 859-323-XXXX
- 859-257-XXXX
- 859-218-XXXX

Inside the University 5 digit extension dialing is allowed. For example, a phone with the DID of 859-323-1234 can be dialed as 3-1234 internally. In order to maintain this 5 digit dialing we would like to request a new NXX where the 6th digit is **NOT** a 0, 1, 3, 7, 8, or 9 if possible. In other words we would prefer one of the below options:

- 859-XX2-XXXX
or
- 859-XX4-XXXX
or
- 859-XX5-XXXX
or
- 859-XX6-XXXX (preferred)

UK Healthcare provides services for the entire state of Kentucky. It includes offerings for virtually every major medical service, such as cardiovascular care, pediatrics, diabetes and psychiatric care, emergency and pulmonary care, rehabilitation, neuroscience, sports medicine and occupational health, obstetrics, stroke treatment, orthopedics, surgery center, oncology/cancer care, women's services, outpatient imaging centers, and wound healing. As of FY 2015 UK Healthcare had assets exceeding \$1.7 billion and generated patient revenue in excess of \$1.2 billion. More than \$1.8 billion has been invested in facilities, technology and programs to support the growth of healthcare initiatives in recent years.

The University of Kentucky is a public, land grant university dedicated to improving people's lives through excellence in education, research and creative work, service and health care. As Kentucky's flagship institution, the University plays a critical leadership role by promoting diversity, inclusion, economic development and human well-being.

The University of Kentucky:

- Facilitates learning, informed by scholarship and research;
- Expands knowledge through research, scholarship and creative activity; and
- Serves a global community by disseminating, sharing and applying knowledge.

The University, as the flagship institution, plays a critical leadership role for the Commonwealth by contributing to the economic development and quality of life within Kentucky's borders and beyond. The University nurtures a diverse community characterized by fairness and equal opportunity.

This order is being placed from the office of the Chief Information Officer for the University of Kentucky in Lexington, KY.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian M. P.", with a large, stylized flourish at the end.

University of Kentucky
Analytics and Technologies
301 Rose St.
Lexington, KY 40506

EXHIBIT 3

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

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : **859-LEXINGTON-
KY-975980**

Date of Application: **01/17/2017** Effective Date:
Date of Receipt: **01/17/2017** Date of Response: **01/17/2017**

Service Provider Name: **WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON**

(LERGTM Routing **9690**
Guide¹) OCN:
Parent Company OCN: **G118**

NPAC SOA SPID :

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: **925-363-7652**

Signature of Pooling
Administrator

Genevieve Bettiga Fax: **925-363-7683**

Name (print)

Email: **genevieve.bettiga@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:

LXTNKYXAPS2

Rate Center:

LEXINGTON

 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.

Appendix 3 - Modified August 6, 2001

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

Date: 01/12/17 OCN: 9690 Company Name: _____ WINDSTREAM COMMUNICATIONS

Rate Center: LEXINGTON

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): 859-218, 859-219, 859-223, 859-224, 859-225, 859-226, 859-231, 859-232, 859-233, 859-243, 859-244, 859-245, 859-246, 859-252, 859-253, 859-254, 859-255, 859-257, 859-257, 859-258, 859-259, 859-260, 859-263, 859-264, 859-266, 859-268, 859-269, 859-271, 859-272, 859-273, 859-275, 859-276, 859-277, 859-278, 859-280, 859-281, 859-288, 859-290, 859-293, 859-294, 859-296, 859-299, 859-313, 859-323, 859-335, 859-357, 859-367, 859-373, 859-381-0,1,2,3,4,5,6,8,9, 859-388-1,3,5,6,7,8,9, 859-389, 859-425, 859-455-0,3,4,5,7,8,9, 859-543, 859-566, 859-639, 859-705-0, 859-892-859-971

Name of Block Applicant: Wanda Crenshaw Signature: _____

Title: MIROR Admin Telephone No.: 786-629-4242 FAX No.: 706-776-4295
E-Mail : Wanda.Crenshaw@windstream.com

A. Available Numbers: 188,007

B. Assigned Numbers: 361,040

C. Total Numbering Resources: 565,000

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 ²	864	-294	-258	-872	-650	-2254								
F. Forecast – Next 12 months ³	-577	-606	-636	-668	-702	-737	-774	-812	-852	-896	-940	-987		
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	-654													
H. Months to Exhaust ⁴	<u>Numbers Available for Assignment to Customers (A)</u>						=						-466	
	Average Monthly Forecast (G)													
I. Utilization ⁵	<u>Assigned Numbers (B) – Excluded Numbers (D)</u>						* 100						=	64%
	Total Numbering Resources (C) – Excluded Numbers (D)													

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))