

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the Matter of the Application of CenturyTel of )  
Missouri, LLC d/b/a CenturyLink, For Review and )  
Reversal of North American Number Plan )  
Thousands-Block Pooling Administrator's Decision )  
to Withhold Numbering Resources. )

Case No. \_\_\_\_\_

**CENTURYTEL OF MISSOURI, LLC d/b/a CENTURYLINK'S  
APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW CenturyTel of Missouri, LLC d/b/a CenturyLink (CenturyLink) and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. (NANPA), to withhold certain numbering resources from CenturyLink. CenturyLink files this verified Application and Motion for Expedited Treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv). The requested numbering resources are necessary to meet the needs of the Columbia Public Schools, in Columbia, Missouri when it implements a new E-911 system. The resources requested consist of a block of 3,000 consecutive numbers beginning with NPA-NXX-3000 or similar number.

In support of this Application, CenturyLink states as follows:

1. CenturyLink is a Louisiana limited liability corporation that is duly authorized to do business in the State of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of CenturyLink's Certificate of Authority to transact business in Missouri from the

Missouri Secretary of State were filed in Case No. TM-2002-232<sup>1</sup>, and are incorporated herein by reference pursuant to 4 CSR 240-2.060(1)(G).

2. All correspondence, pleadings, orders, decisions, and communications regarding this matter should be sent to:

Becky Owenson Kilpatrick  
625 Cherry Street  
Columbia, MO 65201  
Phone: 573.886.3506  
Becky.kilpatrick@centurylink.com

3. There are no pending actions or final unsatisfied judgments or decisions against CenturyLink from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.

4. Columbia Public Schools will be installing a new E911 system that has the capability to provided direct-inward-dialing (DID), which will allow 911 Services to be notified of what specific building and room from which an emergency call is placed. The new E-911 system requires Columbia Public Schools to have a DID associated with every phone extension in the district. Columbia Public Schools is currently assigned the 573-214-3xxx block of numbers, and requests an additional 3,000 sequential numbers. Combining the DID numbers into a sequential numbering plan will be more

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<sup>1</sup> In the Matter of the Joint Application of GTE Midwest Incorporated, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri: 2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) to Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) to Designate CenturyTel of Missouri, LLC, as a Telecommunications Carrier Eligible to Receive Federal Universal Support, Case No. TM-2002-232.

efficient, easier to use and will provide easier assignment for emergency response location.<sup>2</sup>

5. With the establishment of the new E-911 telephone system, Columbia Public Schools will need 3,000 consecutive numbers for the anticipated number of DID numbers needed for every phone extension in the district. Columbia Public Schools plans to use all numbers as quickly as possible in order to implement the new E-911 system.

6. CenturyLink has researched the available thousand-blocks in its Columbia rate center (OFLNMOXADS0) which serves this customer. CenturyLink has no thousands-blocks available for use from which to draw the requested numbering resources that would meet Columbia Public Schools' needs. As a result of this research, CenturyLink requests that the Commission grant it numbering resources with the NPA-NXX of 636-607, beginning 3, 4 and 5 as requested.

7. On January 12, 2015, CenturyLink submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Columbia Public Schools' needs.<sup>3</sup> CenturyLink completed the Thousands-Block Application Form 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.<sup>4</sup>

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<sup>2</sup> A copy of the Customer Request to CenturyLink is attached hereto and marked as Exhibit A.

<sup>3</sup> A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

<sup>4</sup> A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

8. On or about February 26, 2015, NANPA denied the requests on the grounds that CenturyLink had not met the utilization criteria.<sup>5</sup>

9. CenturyLink seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases where customers have required a large amount of sequential numbers and it should likewise do so here.

10. 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 affirm or overturn NANPA's decision to withhold numbering resources.<sup>6</sup> Thus, the 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."<sup>7</sup> 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.<sup>8</sup>

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<sup>5</sup> A copy of this decision is attached hereto and marked as Exhibit D.

<sup>6</sup> 15 FCC Rcd. 7574, *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rule Making, CC Docket No. 99-200 (rel March 31, 2000), Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

<sup>7</sup> *Id.*

<sup>8</sup> *In the Matter of Numbering Resource Optimization, Third Report and Order and Second Order on Reconsideration*, CC Docket No. 99-200, et al, (rel. December 28, 2001), para. 64; *see also*, 47 CFR 52.15(g)(4).

11. The FCC further explained in its March 31, 2000 *Order* 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 in the rate center” and that states “may grant requests for customers seeking contiguous blocks of numbers.”<sup>9</sup> Moreover, 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.”<sup>10</sup>

12. Further, this Application complies with 4 CSR 240-37.040. CenturyLink has attached hereto its “Months to Exhaust Worksheet” indicating the utilization for the Columbia rate center encompassing the preceding six months and projected monthly utilization for the next twelve months.<sup>11</sup> CenturyLink has also attached its most recently filed FCC Form U1 of Form 502 for the Columbia rate center.<sup>12</sup> Finally, CenturyLink attaches copies of its originally-filed requests to NANPA and NANPA’s denial of those requests.<sup>13</sup> These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyLink has exhausted all other available remedies designed to conserve numbering resources.

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<sup>9</sup> *Id.*

<sup>10</sup> *Id.*, at para. 66.

<sup>11</sup> See Exhibit C.

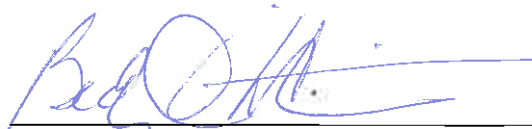
<sup>12</sup> The portions of FCC Form U1 of Form 502 pertaining to the Columbia rate center are attached hereto and marked as Exhibit E (HC) as it contains exchange specific customer numbers. Please note that this file is a copy of the electronic submission that is now required by the Administrator and no longer carries the headings of the paper form that was formerly utilized by the Administrator.

<sup>13</sup> See Exhibits B and D.

13. CenturyLink seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. In order to accommodate Columbia Public Schools' needs, the Commission must issue its order as soon as possible so that CenturyLink will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyLink described herein, both to meet Columbia Public Schools' needs but also so that CenturyLink and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely basis. CenturyLink filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

WHEREFORE, CenturyLink respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Columbia Public Schools in Columbia, Missouri.

Respectfully Submitted,



Becky Owenson Kilpatrick

Bar No. 42042

625 Cherry Street

Columbia, MO 65201

Phone: 573.886.3506

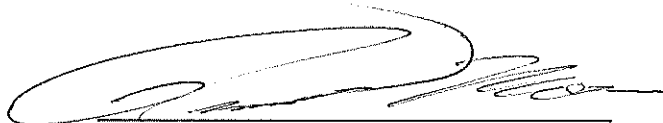
[Becky.kilpatrick@centurylink.com](mailto:Becky.kilpatrick@centurylink.com)

*Attorney for CenturyTel of Missouri, LLC  
d/b/a CenturyLink*

VERIFICATION

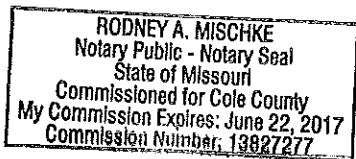
STATE OF MISSOURI       )  
  )  
COUNTY OF Cole       ) ss.

I, Richard W. Moore, of lawful age, and being first duly sworn, now state: I am State Regulatory & Legislative Affairs Manager for CenturyLink, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief.



Richard W. Moore

Subscribed and sworn to before me this 6 day of March, 2015.



Notary Public


My Appointment Expires: 6/22/2017

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16<sup>th</sup> day of March, 2015, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Office of the Public Counsel  
P.O. Box 2200  
Jefferson City, MO 65101  
[mopco@ded.mo.gov](mailto:mopco@ded.mo.gov)

  
\_\_\_\_\_





## Exhibit A

**Date:** 02/24/2015  
**From:** Columbia Public Schools  
**Subj:** Request for 3000 DID numbers  
**To:** Court Chrisman

As requested we submit the following information associated with our request for 3000 DID numbers.

- a. Columbia Public Schools  
Ryan Pelc  
Network Specialist II  
573-214-3909
- b. b. Columbia Public Schools is currently implementing an E-911 system. This upgrade to our phone system will allow 911 Services to be notified of what specific building and room a 911 call is placed from. This new setup requires us to have a DID associated with every phone extension in the district. As such we need 3000 additional DID numbers. CPS currently owns the 573-214-3xxx block of numbers. We request an additional 3000 numbers in the 573-xxx-xxxx number range. We would prefer all 3000 numbers to be contiguous if at all possible, to allow for a more logical E-911 implementation.
- c. CPS currently has 1000 DID numbers in active service, which are tied to six PRI lines that we have housed at three different sites: Aslin Administration Building, Hickman High School, and Rock Bridge High School. These three sites trunk phone service over our IP phone system to 39 locations. We need all existing numbers to remain in existence, and to have no changes made to that extension range.
- d. We need the 3000 additional DID numbers to also be spanned across all six of our PRI lines. Our E-911 system is currently ready to go, except for the DID portion of the config. So, we need these new numbers as soon as possible, to facilitate a timely E-911 deployment for the district.
- e. We are needing the 3000 additional DID numbers to be activated asap. Following activation we will associate all CPS phone extensions with the new numbers and proceed with our E-911 deployment



## Exhibit A

- f. All of our existing numbers will remain unchanged, so CPS does not require any special recordings or forwardings.
- g. Completing our E-911 installation will not be possible without these DID numbers. So, denial of the numbering request is not acceptable for our best business practices.
- h. Our existing 1000 DIDs (573-214-3xxx) numbers are required to remain in existence with no changes.

Ryan Pelc  
Network Specialist II

Exhibit B

Thousands-Block Application Form - Part 1A

Tracking Number: **573-COLUMBIA-MO-810750**

**Individual Block Request**

Type of Application: ☐ New ☐ Change <sup>i</sup> ☐ Disconnect

**GENERAL APPLICATION INFORMATION**

1.1 Contact Information:

**Block Applicant:**

Company Name: **CENTURYTEL OF MISSOURI LLC (CNTL) DBA CENTURYLINK**

Headquarters Address: **100 CenturyLink Dr**

City, State, Zip: **Monroe, LA, 71203**

Contact Name: **Rita Schmitz**

Contact Address: **333 N Front Street**

City, State, Zip: **La Crosse, WI, 54601**

Phone: **608-796-5600** Fax: E-mail: **Rita.Schmitz@CenturyLink.com**

**Pooling Administrator:** <sup>ii</sup>

Contact Name: **Genevieve Bettiga**

Contact Address: **1800 Sutter St**

City, State, Zip: **Concord, CA, 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 needed <sup>iii</sup> \_\_\_\_\_

NPA: 573 LATA: 521 OCN: <sup>iv</sup> 9784 Parent Company's OCN 9784  
Exhibit B Number of Thousands-Blocks Requested : 3

Switch Identification (Switching Entity/POI) : <sup>v</sup>  
CLMAMOXADS1

Rate Center: <sup>vi</sup> COLUMBIA

1.3 Dates:

Date of Application: <sup>vii</sup> 02/26/2015 Requested Block Effective Date:  
<sup>viii</sup> 03/29/2015

☐ 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? (See Section 8.6) Yes \_\_\_\_\_ No X

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) \_\_\_\_\_  
Customer is requesting 3000 consecutive DID numbers. We would request assignment of 573-607-3, 4 & 5.
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any Any three blocks that are not consecutive.
- 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) \_\_\_\_\_

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 <sup>ix</sup> ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company <sup>x</sup> ☐ Effective Date

Change block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

Exhibit B 1.6 Block Return :

- a) Is this block Contaminated: Yes \_\_\_\_\_ or 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 \_\_\_\_\_ or No \_\_\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_\_ or 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 (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Rita Schmitz**

**Process Analyst II**

**02/26/2015**

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 iconectiv™ LERG™ 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 iconectiv Telecom 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 CLLI™ tandem of the facilities based provider <sup>xi</sup>. 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.

Exhibit B 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.

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 unless they meet criteria outlined in section 9.1.2 of these Guidelines. 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.

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Footnotes:

- <sup>i</sup> Identify the type of change(s) in Section 1.5.
- <sup>ii</sup> The Pool Administrator is available to assist in completing these forms.
- <sup>iii</sup> A CO Code application will also need to be submitted to the PA.
- <sup>iv</sup> 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).
- <sup>v</sup> 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 CLLI<sup>TM</sup> code of the switch /POI.
- <sup>vi</sup> Rate Center name must be a tariffed Rate Center.
- <sup>vii</sup> 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.
- <sup>viii</sup> 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).
- <sup>ix</sup> Select if you are the current Block Holder.
- <sup>x</sup> Select if you are not the current Block Holder
- <sup>xi</sup> LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv



Exhibit C

F. Forecast

- Next 12 months<sup>5</sup>      3      0      0      0      0      0      0      0      0      0      0

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):0.5

H. Months  
to Exhaust<sup>6</sup>  
=

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	66662	133324.00
2	67662	135324.00
3	68662	137324.00

I.

Utilization<sup>7</sup>      Assigned Numbers(B)      X 100 =      65.077  
=

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

Explanation: \_\_\_\_\_

<sup>1</sup> 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.

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

<sup>3</sup> Quantity 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).

<sup>4</sup> 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.

<sup>5</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>6</sup> 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, section 52.15 (g) (3) (iii)).

<sup>7</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))



January 12, 2015  
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 573-COLUMBIA-  
MO-810750

Date of Application: 02/26/2015 Effective Date: \_\_\_\_\_

Date of Receipt: 02/26/2015 Date of Response: 02/26/2015

Service Provider Name: CENTURYTEL OF MISSOURI LLC (CNTL) DBA  
CENTURYLINK

(iconectiv<sup>TM</sup> LERG  
TM Routing Guide ) 9784  
OCN: \_\_\_\_\_

Parent Company OCN: 9784

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 : \_\_\_\_\_

Switch Identification(Switch  
Entity/POI): <sup>1</sup>

CLMAMOXADS1

Rate Center:

COLUMBIA

Exhibit D

\_\_\_\_ Form Complete, request denied.

Explanation:

**You do not meet the MTE and/or Utilization requirements, therefore this request for a new block 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.**

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\_\_\_\_ Request withdrawn.

Explanation:

\_\_\_\_ Assignment activity suspended by the administrator.

Explanation:

\_\_\_\_ Remarks:

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)