## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Southwestern Bell Telephone Company d/b/a AT&T Missouri For Review and Reversal Of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources

File No. IO-2009-0451

## AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW AT&T Missouri<sup>1</sup> and pursuant to the Commission's July 14 Order Setting Time for Responses, respectfully provides this response to Staff's Recommendation of July 13, and further, moves the Commission for an order permitting AT&T Missouri to file a supplemental response to Staff's Recommendation by not later than July 24.

Staff's Recommendation indicates that, based on Exhibit E filed with AT&T Missouri's Application (i.e., the FCC Form U1 of Form 502), it appears that AT&T Missouri already has blocks of one thousand telephone numbers in its inventory to meet the numbering resource request of HealthLink, Inc. ("HealthLink"). Staff has asked why those telephone numbers will not satisfy HealthLink's request.

In response to Staff's Recommendation, AT&T Missouri states that questions about the numbering resource usage reflected in the FCC Form U1 are not unusual in numbering resource applications. AT&T Missouri has always stood ready in connection with its own applications to address any and all such questions. While AT&T Missouri has addressed such questions here, there nevertheless remains an open issue having to do with the subject of number portability. While AT&T Missouri has already conveyed some information to Staff regarding this subject, it is actively engaged in securing additional information Staff has requested. This collective

<sup>&</sup>lt;sup>1</sup> Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

information should adequately address whether the telephone numbers identified by Staff can or cannot satisfy HealthLink's request.

AT&T Missouri is diligently pursuing this information. Nevertheless, it needs additional time within which to collect and convey it to Staff. Therefore, AT&T Missouri respectfully moves the Commission for an order granting it through and including July 24, 2009, within which to supplement this response to Staff's Recommendation.

WHEREFORE, AT&T Missouri respectfully files this response and moves for an order allowing it to supplement its response by not later than July 24, 2009.

Respectfully submitted,

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SOUTHWESTERN BELL TELEPHONE COMPANY

BY Robert J. Fry zmela

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## **CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by email on July 20, 2009.

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