

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

In the Matter of the Application of)	
Southwestern Bell Telephone Company)	
d/b/a AT&T Missouri For Review and)	File No. IO-2011-0116
Reversal of North American Number Plan)	
Thousands-Block Pooling Administrator's)	
Decision to Withhold Numbering Resources)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On October 27, 2010, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T) filed a request to review and reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for 1 block of one-thousand telephone numbers in the Washington rate center. Specifically, the Rapco Horizon Company requests 100 consecutive telephone numbers in the NPA of 573 within the Jackson rate center.

2. The Pooling Administrator denied the Company's request because it did not meet the utilization criteria required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from the Company if the Commission determines that the Company has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. 52.15 (g)(4).

3. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T has met this standard. The Staff explains that the Company needs the additional one-thousand block of additional numbers in the Jackson rate center.

WHEREFORE, the Staff recommends that the Commission issue an order that:

(1) Determines that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2) Overturns the decision of the Pooling Administrator and grants AT&T's request for 1 block of one-thousand telephone numbers in the NPA of 573 within the Jackson rate center.

(3) States that AT&T's request for one, thousands-block of telephone numbers in the Jackson, Missouri rate center is granted.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of November, 2010.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2011-0116

From: William Voight
Supervisor, Rates and Tariffs
Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for
Additional Numbering Resources to Accommodate the needs of The
Rapco Horizon Company of Jackson, Missouri.

Date: October 28, 2010

On October 27th, AT&T Missouri (AT&T) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny AT&T's request for additional telephone numbering resources in the Jackson, Missouri telephone rate center (Application). According to AT&T, The Rapco Horizon Company in Jackson is in the process of upgrading its internal telephone system, and Rapco Horizon wishes to have consecutive telephone numbers assigned for its internal dialing purposes.

According to its Application, AT&T states that it does not have the necessary telephone numbers to grant Rapco Horizon's request for 100 consecutive telephone numbers. AT&T requests the Commission to override the NANPA's denial of AT&T's request for the additional telephone numbers, which denial was based on AT&T's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T currently has enough unused telephone numbers to provide service to The Rapco Horizon Company; however, the available telephone numbers are not in a sequential order, as requested by Rapco Horizon.

In support of its Application, AT&T provided copies of its NANPA request and subsequent denial by the NANPA. Additionally, AT&T provided Staff highly confidential copies of its telephone number utilization for the Jackson rate center. In the Staff's opinion, AT&T has demonstrated a verifiable need for the additional telephone numbers, and Staff recommends the Commission approve AT&T's request and order a reversal of the NANPA decision to deny the numbers for Rapco Horizon.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

“AT&T's request for one, thousands-block of telephone numbers in the Jackson, Missouri rate center is granted.”

Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined AT&T's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

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Case No. IO-2011-0116

AFFIDAVIT OF William Voight

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

William Voight, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Staff recommendation, and that the facts therein are true and correct to the best of his knowledge and belief.

Bill Voight

WILLIAM VOIGHT

Subscribed and affirmed before me this 28th day of October 2010.



Carla K. Schnieders
NOTARY PUBLIC

CARLA K. SCHNIEDERS
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: August 25, 2012
Commission Number: 08533187