

**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 Reversal of North American)
Number Plan Thousands-Block)
Pooling Administrator's Decision to Withhold)
Numbering Resources)

File No. IO-2016-0009

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Recommendation in this matter states as follows:

1. On July 8, 2015, Southwestern Bell Telephone Company, d/b/a AT&T Missouri filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the Leavenworth-Lansing, Missouri rate center to meet the needs of SBC Internet Services, Inc. d/b/a AT&T Internet Services (SBCIS/ATTIS). More specifically, the requested resources consist of one thousands-block in the 816 NPA, the Leavenworth-Lansing rate center, the 816-NXX-7XXX range and it must be a Special Service Code Type N.

2. AT&T Missouri states that it does not have the numbers available for assignment in the Leavenworth-Lansing center to meet SBCIS/ATTIS's needs. NANPA denied AT&T Missouri's request for the additional telephone numbers based on AT&T Missouri's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers; however, said numbers do not meet the required criteria.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Leavenworth-Lansing rate center. The Staff has examined AT&T Missouri's request and supporting documentation. In the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers.

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

- (1) Determines AT&T Missouri 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 Missouri's request for telephone numbers in the listed rate centers, and
- (3) Contains the following language:

Grant AT&T Missouri's request for a one thousands-block, in the Leavenworth-Lansing, Missouri rate center, in the 816-NXX-7XXX range, with a Special Service Code Type N. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying AT&T Missouri's original request. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,



Colleen M. Dale
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Attorney for the Staff of the
Missouri Public Service Commission
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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 22nd day of July, 2015.

A handwritten signature in black ink, appearing to be "All Day".

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2016-0009

From: Kari Salsman
Telecommunications Department
John VanEschen
Tariff, Safety, Economic and Engineering Analysis

Subject: Staff's Recommendation to Southwestern Bell Telephone Company d/b/a AT&T Missouri Request for Additional Numbering Resources to accommodate the needs of SBC Internet Services, Inc. d/b/a AT&T Internet Services in the Leavenworth-Lansing rate center.

Date: July 20, 2015

On July 8th, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of AT&T Missouri for additional telephone numbering resources in the Leavenworth-Lansing, Missouri telephone rate center (Application). According to AT&T Missouri, SBC Internet Services, Inc. d/b/a AT&T Internet Services (SBCIS/ATTIS) is expanding its network in the Leavenworth-Lansing rate center in the Kansas City metropolitan area. With this expansion, SBCIS/ATTIS is in need of additional numbering resources. To accommodate its needs, SBCIS/ATTIS is in need of one thousands-block in the 816 NPA, the Leavenworth-Lansing rate center, the 816-NXX-7XXX range and it must be a Special Service Code Type N.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Leavenworth-Lansing rate center to meet the needs of SBCIS/ATTIS and requests the Commission to override the NANPA's denial of AT&T Missouri's request for the additional telephone numbers, which denial was based on AT&T Missouri's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers to assign SBCIS/ATTIS; however, said numbers are not Special Service Code Type "N" numbers which are typically used for plain old telephone service. The numbers currently available are numbers designated for an extended local calling area.

In support of its Application, AT&T Missouri provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, AT&T Missouri provided Staff highly confidential copies of its telephone number utilization for the Leavenworth-Lansing rate center. The Staff has examined the request of AT&T Missouri and supporting documentation.

The Staff has examined AT&T Missouri's request and in the Staff's opinion, ATAT's application complies with the requirements of 4CSR240-37.040. AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for SBCIS/ATTIS.

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

Grant AT&T Missouri's request for a one thousands-block, in the Leavenworth-Lansing, Missouri rate center, in the 816-NXX-7XXX range, with a Special Service Code Type N. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying AT&T Missouri's original request. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

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

Under penalty of perjury, I affirm that the above statement is true and correct.

A handwritten signature in cursive script that reads "Kari Salsman".

KARI SALSMAN