

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

In the Matter of the Application of Windstream)
Missouri, LLC for Review and Reversal of the)
Decision of Somos, Inc. as the Pooling)
Administrator to Withhold Numbering Resources)

File No. IO-2020-0139

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 November 18, 2019, Windstream Missouri, LLC, 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 Thousands-Block Pooling Administrator (NANPA), Somos, Inc., to withhold certain numbering resources from Windstream Missouri to support the broadband stimulus project in Grandin, Oxly, Patterson, Ponder and Wappapello Park, Missouri. More specifically, Windstream Missouri is installing new packet switches in these service areas. To accommodate its needs, Windstream Missouri is in need of a separate location routing number (LRN) to identify each recipient switch or point of interconnection (POI) and must appoint one LRN per local access and transport area (LATA) from an assigned NXX or area code for each recipient switch in the number portability capable network. Windstream Missouri must hold the NXX code for each of the five separate LRNs it requests and will retain only a single one-thousands block from each NXX code.

2. Windstream Missouri states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied its request for the

separate LRNs based on Windstream Missouri's inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined Windstream Missouri's request and supporting documentation. In Staff's opinion, Windstream Missouri has demonstrated a verifiable need for the additional telephone numbers and complied with 20 CSR 4240-28.016. Staff recommends the Commission approve Windstream Missouri's request and order a reversal of the NANPA decision to deny the additional LRNs.

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

(1). Determines Windstream 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 Windstream Missouri's request for telephone numbers in the designated areas; and

(3) Contains the following language:

Grant Windstream's request for five LRNs and five NXXs, in the Grandin, Oxly, Patterson, Ponder and Wappapello Park, Missouri rate centers. Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 27th day of November, 2019, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2020-0139

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve Windstream Missouri, LLC's Request for Additional Numbering Resources to accommodate the deployment of a Broadband Stimulus Project.

Date: November 27, 2019

On November 18th Windstream Missouri, LLC (Windstream) 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 Windstream's request for additional telephone numbering resources in the Grandin, Oxly, Patterson, Ponder and Wappapello Park, Missouri telephone rate centers (Application). According to Windstream, additional numbering resources are necessary to support the broadband stimulus project. Windstream is installing new packet switches in the Grandin, Oxly, Patterson, Ponder and Wappapello Park, Missouri rate centers to support the project. Windstream must establish a unique Location Routing Number (LRN) to identify each recipient switch or Point of Interconnection (POI) and must establish one LRN per local access and transport area (LATA) from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain separate LRN's for each of these five new packet switches. Only an NXX code holder can obtain an LRN which necessitates Windstream's request for five separate NXX codes. Windstream will retain only single thousand-number-block from each of these new NXX codes.

Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the Broadband Stimulus project.

In support of its Application, Windstream provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Windstream provided Staff highly confidential copies of its telephone number utilization for the Grandin, Oxly, Patterson, Ponder and Wappapello Park, rate centers.

Staff has examined Windstream's request supporting documentation, and in Staff's opinion, Windstream's application complies with the requirements of 20 CSR 4240-28.016. Staff has granted similar requests by Windstream for numbering resources to support a broadband stimulus project with the most recent being Case No. IO-2018-0203. Windstream has demonstrated a verifiable need for the additional telephone numbers. Staff recommends the Commission approve

Windstream's request and order a reversal of the NANPA decision to deny the additional numbers for the Broadband Stimulus project.

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

Grant Windstream's request for five LRNs and five NXXs, in the Grandin, Oxly, Patterson, Ponder and Wappapello Park, Missouri rate centers. Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.