

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

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|---|---|-----------------------|
| In the Matter of the Application of |) | |
| CenturyTel of Missouri, LLC for Review |) | |
| and Reversal of the North American |) | |
| Numbering Plan Administrator's Decision |) | Case No. IO-2006-0195 |
| to Withhold Numbering Resources for the |) | |
| Wentzville, Missouri Rate Center. |) | |

STAFF RECOMMENDATION

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

1. CenturyTel of Missouri, LLC ("CenturyTel") filed an application requesting the Commission to issue an order reversing the decision of the North American Numbering Plan Administrator, NeuStar, Inc., ("NANPA") to withhold numbering resources which CenturyTel had requested to service the needs of customers in the Wentzville rate center.

2. This Commission may overturn the NANPA's decision to withhold numbering resources from CenturyTel if the Commission determines that CenturyTel has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 CFR §52.15(g)(4).

3. In the attached Memorandum, the Staff agrees that CenturyTel has demonstrated a verifiable need for one 1,000 block of numbers and has exhausted all other available remedies, and therefore recommends that the Commission issue an order overturning the NANPA's decision denying a single 1,000 block of numbers to CenturyTel.

4. The Staff also requests that the Commission direct CenturyTel to sequentially assign the 1,000 block of numbers.

WHEREFORE, the Staff respectfully recommends that the Commission issue an order that: (1) determines that CenturyTel has demonstrated a verifiable need for one 1,000 block of numbers and has exhausted all other available remedies; (2) reverses the decision of the NANPA for one 1,000 block of additional numbers and directs NANPA to issue to CenturyTel a block of 1,000 NXX codes in the Wentzville rate center; and (3) directs CenturyTel to sequentially assign the 1,000 block of numbers.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Marc Poston
Marc Poston
Senior Counsel
Missouri Bar No. 45722

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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 7th day of December 2005.

/s/ Marc Poston

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2006-0195

CenturyTel of Missouri, LLC

From: Sara Buyak
Telecommunications Department

William Voight 11-28-05
Utility Operations Division/Date

Marc Poston 12-7-05
General Counsel's Office/Date

Subject: Staff Recommendation to Approve CenturyTel's Request to Override a Decision
by the North American Numbering Plan Administrator

Date: November 28, 2005

SUMMARY: CenturyTel has requested that the Commission reverse a decision by the North American Numbering Plan Administrator, which denied CenturyTel's request for an additional block of one thousand telephone numbers in the Wentzville rate center. This memorandum recommends approval of CenturyTel's request.

BACKGROUND: On November 3, 2005, CenturyTel of Missouri, LLC (CenturyTel) filed with the Missouri Public Service Commission (Commission) a request for additional numbering resources, to be assigned to the Wentzville rate center. Although CenturyTel initially applied to NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator) for two blocks of one thousand telephone numbers, footnote one of CenturyTel's instant application clarifies that it seeks only one block of one thousand telephone numbers. CenturyTel states that it was denied the request by NeuStar, even though CenturyTel has nearly reached a point of numbering exhaust in the Wentzville rate center. CenturyTel requests the Commission review and reverse the decision of NeuStar.

CenturyTel states that it submitted the necessary worksheets to NeuStar, and offers copies of those documents as Exhibits A and B to its application in this Case. CenturyTel states that it was denied the additional telephone numbers because it did not meet the necessary requirements established by the Federal Communications Commission. CenturyTel states that it does have unused telephone numbers available in the Wentzville rate center; however, it is unable to use the spare numbers because of Missouri's Metropolitan Calling Area plan (MCA). CenturyTel states that the MCA plan requires use of segregated NXX codes which requires a minimum of two codes per telephone exchange - one code for MCA telephone numbers, and an additional code for non-MCA telephone numbers. Therefore, CenturyTel seeks the additional numbers to service the future needs of customers requiring MCA numbers.

RECOMMENDATION: CenturyTel does not meet requirements for additional telephone numbers because the months-to-exhaust criteria exceeds a six months supply of telephone numbers and does not meet the required utilization rate of 75% as set forth in the FCC guidelines. However, Missouri's MCA requires separate codes to serve both MCA and non-MCA customers, and CenturyTel does not have sufficient MCA numbers available to service the future needs of customers in the Wentzville rate center. For this reason, CenturyTel has demonstrated a verifiable need for one block of 1,000 additional numbers in the Wentzville rate center. Therefore, the Staff recommends approval of CenturyTel's application. Additionally, the Staff recommends the Commission's order include two statements substantially as follows:

1. CenturyTel's request for a block of 1,000 telephone numbers is granted.
2. CenturyTel shall sequentially assign the block of 1,000 telephone numbers.

Staff is unaware of any other filing that may affect or be affected by this filing.

☒ **The Company is not delinquent in filing an annual report and paying the PSC assessment.**

☐ **The Company is delinquent. Staff recommends the Commission grant the requested relief/action on the condition the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this case after it has corrected the delinquency.**

(☐ No annual report ☐ Unpaid PSC assessment. Amount owed:)