

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

In the Matter of the Application of )  
CenturyTel of Missouri, LLC, for Review )  
and Reversal of the North American )  
Numbering Plan Administrator's Decision )  
to Withhold Numbering Resources for the )  
Warrenton, Wentzville, Defiance, )  
Dardenne & Moscow Mills, Missouri Rate )  
Centers. )

Case No. IO-2008-0040

**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 with NeuStar, Inc., the Pooling Administrator of the North American Numbering Plan ("Pooling Administrator") to obtain 1,000 blocks of telephone numbers to implement Metropolitan Calling Area ("MCA") in the CenturyTel rate centers of Wentzville, Defiance, Dardenne, and Moscow Mills. The Pooling Administrator denied CenturyTel's request because CenturyTel's utilization rate did not meet the required utilization rate. CenturyTel now seeks review of the Pooling Administrator's decision.
2. Staff notes that CenturyTel's request to obtain one 1,000 block of telephone numbers to implement non-MCA in the CenturyTel rate center of Warrenton has been withdrawn and is now moot, as NeuStar has now granted that request on August 31, 2007.
3. This Commission may overturn the Pooling Administrator'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 C.F.R. § 52.15(g)(4).

3. In the attached Memorandum, labeled Appendix A, the Staff agrees that CenturyTel has demonstrated a verifiable need for numbering resources, and has exhausted all other available remedies, for:

- (a) One block of 1,000 MCA NXX telephone numbers in the Wentzville rate center.
- (b) One block of 1,000 MCA NXX telephone numbers in the Dardenne rate center.
- (c) One block of 1,000 MCA NXX telephone numbers in the Defiance rate center.
- (d) One block of 1,000 MCA NXX telephone numbers in the Moscow Mills rate center.

Staff recommends that the Commission issue an order overturning the Pooling Administrator's decision on these requests.

4. Staff notes that Missouri's MCA requires separate codes to serve both MCA and non-MCA customers. Even though CenturyTel has sufficient non-MCA numbers available to service customer needs in the Wentzville, Dardenne, Defiance, and Moscow Mills rate centers, CenturyTel does not have sufficient MCA numbers available to service the future needs of customers in those same rate centers.

**WHEREFORE**, the Staff recommends that the Commission, at its earliest convenience, issue an order that:

(1) determines that CenturyTel has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies for:

- (a) One block of 1,000 MCA NXX telephone numbers in the Wentzville rate center.
- (b) One block of 1,000 MCA NXX telephone numbers in the Dardenne rate center.
- (c) One block of 1,000 MCA NXX telephone numbers in the Defiance rate center.
- (d) One block of 1,000 MCA NXX telephone numbers in the Moscow Mills rate center.

(2) reverses the decision of the Pooling Administrator and approves CenturyTel's request for blocks of 1,000 numbers in the Wentzville, Defiance, Dardenne, and Moscow Mills exchanges and, specifically, grant:

- (a) CenturyTel's request for a one block of 1,000 MCA NXX telephone numbers in the 636-887 for the Wentzville rate center.

- (b) CenturyTel's request for a one block of 1,000 MCA NXX telephone numbers in the 636-695 in the Dardenne rate center.
- (c) CenturyTel's request for a one block of 1,000 MCA NXX telephone numbers in the 636-798 in the Defiance rate center.
- (d) CenturyTel's request for a one block of 1,000 MCA NXX telephone numbers in the 636-366 in the Moscow Mills rate center.

Respectfully submitted,

/s/ Shelley Syler Brueggemann  
Shelley Syler Brueggemann  
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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 4<sup>th</sup> day of September 2007.

/s/ Shelley Syler Brueggemann\_\_\_\_\_

# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. IO-2008-0040

CenturyTel of Missouri, LLC

From: Sara Buyak  
Telecommunications Department

<u>William Voight</u>	<u>9-4-07</u>	<u>/s/ Shelley Syler Brueggemann</u>	<u>9-4-07</u>
Utility Operations Division/Date		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: September 4, 2007

SUMMARY: CenturyTel has requested that the Commission reverse a decision by the North American Numbering Plan Administrator, which denied CenturyTel's request for:

1. One block of 1,000 MCA NXX telephone numbers in the Wentzville rate center.
2. One block of 1,000 MCA NXX telephone numbers in the Dardenne rate center.
3. One block of 1,000 MCA NXX telephone numbers in the Defiance rate center.
4. One block of 1,000 MCA NXX telephone numbers in the Moscow Mills rate center.

This memorandum recommends approval of CenturyTel's request.

BACKGROUND: On August 9, 2007, CenturyTel of Missouri, LLC (CenturyTel) filed with the Missouri Public Service Commission (Commission) a request for additional numbering resources, to be assigned to the Warrenton, Wentzville, Dardenne, Defiance, and Moscow Mills rate centers. CenturyTel states that it was denied the request by NeuStar because the months to exhaust and utilization rate did not meet the 75% as required by the Federal Communications Commission for Warrenton, Wentzville, Dardenne, Defiance, and Moscow Mills rate center. CenturyTel requests the Commission review and reverse the decision of NeuStar.

CenturyTel offers copies of Part 1 of the Application filed with NeuStar as Exhibits A, B, C, D, E, F, G and H 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 rate centers but are unable to use those telephone numbers because of Missouri's Metropolitan Calling Area plan (MCA). 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 telephone numbers.

On August 31, 2007, NeuStar filed a request to the Pooling Administrator for one block of 1,000 telephone numbers in the non-MCA code of 636-235 assigned to Warrenton. The Pooling Administrator granted the request. On August 31, 2007, CenturyTel filed a notice to the Commission to withdraw its request for a block of 1,000 telephone numbers in the Warrenton exchange.

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, Dardenne, Defiance, and Moscow Mills rate center. For this reason, CenturyTel has demonstrated a verifiable need for:

1. One block of 1,000 MCA NXX telephone numbers in the Wentzville rate center.
2. One block of 1,000 MCA NXX telephone numbers in the Dardenne rate center.
3. One block of 1,000 MCA NXX telephone numbers in the Defiance rate center.
4. One block of 1,000 MCA NXX telephone numbers in the Moscow Mills rate center.

Therefore, the Staff recommends approval of CenturyTel's application. Additionally, the Staff recommends the Commission's order include four statements substantially as follows:

1. CenturyTel's request for one block of 1,000 MCA NXX telephone numbers in the 636-887 for the Wentzville rate center is granted.
2. CenturyTel's request for one block of 1,000 MCA NXX telephone numbers in the MCA NXX code of 636-695 in the Dardenne rate center is granted.
3. CenturyTel's request for one block of 1,000 MCA NXX telephone numbers in the MCA NXX code of 636-798 in the Defiance rate center is granted.
4. CenturyTel's request for one block of 1,000 MCA NXX telephone numbers in the MCA NXX code of 636-366 in the Moscow Mills rate center is granted.

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: )

