

**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)	File No. IO-2009-0451
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

**OFFICE OF THE PUBLIC COUNSEL'S RESPONSE TO STAFF'S
RECOMMENDATION**

The Office of the Public Counsel supports Staff's recommendation given the record in this case. The Commission should not be asked to review and reverse a decision to withhold numbering resource without full disclosure of the relevant evidence and information. Here the Staff has spotlighted AT&T's failure to supply the specific reasons why AT&T's existing inventory of numbering resource will not satisfy the requested block of numbers. Staff's request was reasonable and the information requested is relevant.

Public Counsel usually supports or does not object to AT&T's or other carrier's requests to review and reverse the NANPA Pooling decision. However, the companies usually provide relevant and convincing evidence with the request to demonstrate how the Pooling Administrator's ruling based on the strict application of guidelines is inconsistent with the specific Missouri facts and the public interest. The proposed issuance of the numbering resources should not waste numbering resources or pose an unnecessary threat of exhaustion.

AT&T failed to provide the information and Staff's recommendation is reasonable, subject to further review if the information is submitted.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ **Michael F. Dandino**

BY: _____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed or hand delivered this 16th day of July, 2009 to the following:

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