## 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-2010-0013
Number Plan Thousands-Block Pooling	)	
Administrator's Decision to Withhold Numbering	)	
Resources	)	

## STAFF REPLY IN OPPOSITION TO AT&T MISSOURI'S MOTION FOR EXPEDITED TREATMENT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and respectfully requests that the Commission deny AT&T Missouri's Motion for Expedited Treatment in this matter, in which it asks the Commission to overturn the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. ("NANPA"), to withhold certain numbering resources from AT&T Missouri.

As its basis for its request for expedited treatment, AT&T Missouri asserts as follows:

14. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within ten (10) business days. MCC's July 2 letter states that MCC "need[s] to activate the new numbers by September 15, 2009, or sooner, if possible" and that "[i]t is important that we know within 30-45 days if our request can be granted." (Exhibit A). In order to accommodate MCC's needs, the Commission must issue its order expeditiously, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of the numbering resources to AT&T Missouri described herein. AT&T Missouri filed this request for expedited treatment as soon as it could have. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri's request for numbering resources on July 2, and AT&T Missouri determined that it was not feasible to implement a technological alternative.

The Staff does not usually oppose requests to expedite matters, but in this case, filed on a Friday, ten business days is simply impossible for the Staff to review this matter and prepare and file a Staff Recommendation in sufficient time to allow an RLJ to

write an Order, distribute it to the Commissioners, have it placed on the Commission's Agenda and have it voted out no later than July 23. The only scheduled Commission Agenda during that time period is Wednesday, July 15. The Commission's internal deadlines would require that the Order be drafted and disseminated to Commissioners no later than next Tuesday morning. Allowing only two business days in which to complete the review, submit a Staff Recommendation and draft an Order is not reasonable.

**WHEREFORE**, the Staff respectfully requests that the Commission deny AT&T's Motion for Expedited Treatment.

Respectfully submitted,

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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 10th day of July, 2009.

Cully Dale