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-2013-0355
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

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 January 15, 2013, Southwestern Bell Telephone Company, d/b/a AT&T Missouri, 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 Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the Farmington, Missouri rate center. More specifically, the requested resources consist of one thousands-block from which 200 consecutive numbers may be drawn that are within (1) the 573 NPA, (2) an XXXX within the range from 5100 through 5299, and (3) the Farmington rate center, to meet the needs of the St. Francois County Ambulance District.
- 2. AT&T Missouri states that it does not have the numbers available for assignment in the Farmington rate center to meet the needs of the St. Francois County Ambulance District. NANPA denied AT&T's request for the additional telephone numbers based on AT&T's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers to assign to the St. Francois County Ambulance District; however, said numbers are not in sequential order.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Farmington rate center. The Staff has examined AT&T Missouri's request and supporting documentation. In the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for the St. Francois County Ambulance District.

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

- (1) Determines AT&T 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 AT&T Missouri's request for telephone numbers in the St. Louis rate center; and
 - (3) Contains the following language:

AT&T Missouri's request for one thousands-block within the 573 NPA, an XXXX range from 5100 through 5299, in the Farmington, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

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 25^{th} day of January, 2013.

MEMORANDUM

To: Missouri Public Service Commission Official Case File

Case No. IO-2013-0355

From: Kari Salsman

William Voight

Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for

Additional Numbering Resources to accommodate the needs of St. François County Ambulance District in the Farmington rate center.

Date: January 23, 2013

On January 15th, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny AT&T Missouri's request for additional telephone numbering resources in the Farmington, Missouri telephone rate center (Application). According to AT&T Missouri, St. Francois County Ambulance District (SFCAD) is expanding its current operations. To accommodate its needs, SFCAD is in need of 200 additional lines in sequential order. Specifically, the requested resources consist of a one thousands-block from which 200 consecutive numbers may be drawn that are within (1) the 573 NPA, (2) an XXXX range from 5100-5299 (i.e., 573-NXX-5100 through 5299) and (3) the Farmington rate center.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Farmington rate center to meet the needs of SFCAD. AT&T Missouri requests the Commission to override the NANPA's denial of AT&T Missouri's request for the additional telephone numbers, which denial was based on AT&T Missouri's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers to assign SFCAD; however, said numbers are not in sequential order.

In support of its Application, AT&T Missouri provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, AT&T Missouri provided Staff highly confidential copies of its telephone number utilization for the Farmington rate center. The Staff has examined AT&T Missouri's request and supporting documentation.

The Staff has examined AT&T Missouri's request and in the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for SFCAD.

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

AT&T Missouri's request for one thousands-block within the 573 NPA, an XXXX range from 5100 through 5299, in the Farmington, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

Under penalty of perjury, I affirm that the above statement is true and correct.

KARI SALSMAN