

**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 Number) **File No. IO-2015-0317**
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 June 1, 2015, 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 Lee's Summit, Missouri rate center to meet the needs of St. Luke's East Hospital. More specifically, the requested resources consist of 200 consecutive numbers within the XX7-XXXX range of 0400-4399; 4500-4599; 5500-5599; 5800-5899; or 6400-9999.

2. AT&T Missouri states that it does not have the numbers available for assignment in the Lee's Summit center to meet St. Luke's needs. NANPA denied AT&T Missouri's request for the additional telephone numbers 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; however, said numbers do not meet the required criteria.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Lee's Summit 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.

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 listed rate centers, and
- (3) Contains the following language:

Grant AT&T Missouri's request for 200 consecutive numbers within the 816 NPA, with an XX7-XXXX range of 0400-4399; 4500-4599; 5500-5599; 5800-5899; or 6400-9999, in the Lee's Summit, Missouri rate center.

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 4th day of June, 2015.

A handwritten signature in black ink, appearing to be "Allan" followed by a stylized flourish.

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2015-0317

From: Kari Salsman
Telecommunications Department
John VanEschen
Tariff, Safety, Economic and Engineering Analysis

Subject: Staff's Recommendation to Southwestern Bell Telephone Company d/b/a AT&T Missouri Request for Additional Numbering Resources to accommodate the needs of Saint Luke's Health System in the Lee's Summit rate center.

Date: June 3, 2015

On June 1st, 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 Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of AT&T Missouri for additional telephone numbering resources in the Lee's Summit, Missouri telephone rate center (Application). According to AT&T Missouri, Saint Luke's Health System (St. Luke's) is expanding its voice network at its East Hospital in Lee's Summit. With this expansion, St. Luke's is in need of additional numbering resources that would be consistent with St. Luke's larger voice network serving its entire health system across the greater Kansas City metropolitan area. To accommodate its needs, St. Luke's is in need of 200 consecutive numbers within the XX7-XXXX range of 0400-4399; 4500-4599; 5500-5599; 5800-5899; or 6400-9999.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Lee's Summit rate center to meet the needs of St. Luke's and 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 St Luke's; 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 Trenton rate center. The Staff has examined the request of AT&T Missouri and supporting documentation.

The Staff has examined AT&T Missouri's request and in the Staff's opinion, ATAT's application complies with the requirements of 4CSR240-37.040. 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 St. Luke's.

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

Grant AT&T Missouri's request for 200 consecutive numbers within the 816 NPA, with an XX7-XXXX range of 0400-4399; 4500-4599; 5500-5599; 5800-5899; or 6400-9999, in the Lee's Summit, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyLink's original request.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined AT&T Missouri's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

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



KARI SALSMAN