

**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)	

CORRECTED SECOND STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Corrected Staff Recommendation in this matter states as follows:

1. On June 30, 2009, 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 form of one block of 1,000 numbers from which 700 consecutive numbers may be drawn, such that the numbers are within (1) the 314 NPA; (2) the St. Louis rate center (STLSMO01DSA); (3) an NXX other than 923; and (4) the XXXX range of 6000 through 6699 to service the needs of HealthLink, Inc. in St. Louis, Missouri. AT&T Missouri indicated that if the requested numbering resources were not available, they request numbering resources within the XXXX blocks of 2XXX, 5XXX, or 8XXX, and that those numbers conform to the remaining numbering resource needs set forth in items (1) through (3) above. The numbering resources are required in order to meet HealthLink's relocation needs for suitable numbering resources at its new address.

2. On July 13, 2009, the Staff filed a Recommendation in which it requested that the Commission deny AT&T's request, based on AT&T's failure to answer all of Staff's questions within the time allotted. The Commission granted additional time, and AT&T has now fully responded.

3. AT&T based its request on the request of HealthLink, Inc. for 700 consecutive telephone numbers, required for the company to relocate from 12443 Olive Boulevard to 1831 Chestnut Street. HealthLink's prefers to keep its existing block of telephone numbers but change the NXX, (314) NXX-6000-6699. AT&T states there are no available blocks of one thousands

telephone numbers that meet HealthLink's needs. According to Exhibit E (HC), AT&T has blocks of one thousand telephone numbers in its inventory to meet HealthLink's request.

4. On July 24, 2009, Staff became aware that HealthLink is now requesting to keep its 4- digit telephone numbers without change. After review of AT&T's July 23, 2009 Response, the Staff now recommends approval of AT&T's request. Staff is modifying its position because the existing 6XXX block of numbers cannot be ported and because the 5XXX block of numbers does not provide an acceptable solution to HealthLink.

WHEREFORE, the Staff respectfully requests that the Commission grant AT&T's Request for Review and Reversal of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources. The staff specifically requests that the following language be contained in the Commission's Order:

The Commission grants AT&T's request to overturn a decision of the Pooling Administrator, and grant AT&T's request to open a block of 6XXX numbers in the St. Louis rate center (314-NXX-6XXX). If the requested block is unavailable from the Pooling Administrator, the Commission further directs that AT&T shall not make any request for alternative numbers, (such as the 2XXX, 5XXX, or 8XXX blocks), for which AT&T is able to fulfill HealthLink's alternative request from its pool of existing numbers .

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

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 27th day of July, 2009.

A handwritten signature in black ink, appearing to read "Cully Dale", is positioned above a horizontal line.

Cully Dale

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2009-0451
Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T)

From: William Voight
Telecommunications Department

Subject: Supplemental Staff Recommendation to Approve AT&T's Request to
Override a Decision of the North American Numbering Plan
Administrator

Date: July 27, 2009

On July 13th the Telecommunication Department Staff (Staff) filed a recommendation requesting the Commission deny AT&T's request for the Commission to reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for one block of one thousand telephone numbers in the Saint Louis rate center. Subsequent to Staff's recommendation, AT&T on July 23rd submitted a response which included e-mails between the Staff and AT&T subject matter experts from the time period July 2 to July 22.

The customer of record in this case is HealthLink. On July 24th Staff became aware that HealthLink had reconsidered previous statements, and was now requesting to keep its 4-digit telephone numbers without change. After having reviewed AT&T's July 23rd Response and analyzing the technical information as well as learning of the customer's latest change of position, the Staff now wishes to recommend approval of AT&T's request. Essentially, Staff is modifying its previous position because the existing 6XXX block of numbers in question cannot be ported from an AT&T switch, and because the 5XXX block of numbers in question represent an unacceptable solution for HealthLink.

Staff wishes to note its concern over AT&T's inability to port the 6XXX block due to technical limitations; however, the Staff is of the view that this case is not the appropriate time to address technical limitations of older generation switches. Moreover, Staff also notes that in spite of initial comments by the customer to the contrary, AT&T reports that HealthLink has subsequently decided that a 5XXX block of numbers is an unacceptable solution because it would necessitate that its end-users change their 4-digit telephone numbers. Lastly, the Staff notes that HealthLink's current numbers will be subject to normal reclamation processes. For these reasons, the Staff believes AT&T has demonstrated a verifiable need for the additional numbering resources and Staff recommends approval of AT&T's request.

In conclusion, the Staff requests the Commission's order state substantially the following:

The Commission grants AT&T's request to overturn a decision of the Pooling Administrator, and grant AT&T's request to open a block of 6XXX numbers in the St. Louis rate center (314-NXX-6XXX). If the requested block is unavailable from the Pooling Administrator, the Commission further directs that AT&T shall not make any request for alternative numbers, (such as the 2XXX, 5XXX, or 8XXX blocks), for which AT&T is able to fulfill HealthLink's alternative request from its pool of existing numbers.

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: (☐ No annual report ☐ Unpaid PSC assessment.
Amount owed:)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

)
)

Case No. IO-2009-0451

AFFIDAVIT OF William Voight

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

William Voight, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Supplemental Staff Recommendation, and that the facts therein are true and correct to the best of his knowledge and belief.

William Voight

WILLIAM VOIGHT

Subscribed and affirmed before me this 27th day of July 2009.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086

Susan L. Sundermeyer

NOTARY PUBLIC