BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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 Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources

File No. IO-2011-0150

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On November 23, 2010, Southwestern Bell Telephone Company d/b/a AT&T Missouri filed an Application and Motion for Expedited Treatment under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator (Pooling Administrator), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the Harvester rate center.

2. The Pooling Administrator denied AT&T Missouri's request because AT&T did not meet the months to exhaust and 75% utilization criteria required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that the Company has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. 52.15 (g)(4).

3. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T Missouri has met this standard. The Staff explains that AT&T Missouri needs the additional numbering resources in the Harvester rate center.

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 ATT's request for one, thousands-block of telephone numbers beginning with either a "6" or "7" in the Harvester rate center, or if those are unavailable, other blocks suitable to meet AT&T's customer's needs.

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 29_{th} day of November, 2010.

MEMORANDUM

То:	Missouri Public Service Commission Official Case File Case No. IO-2011-0150
From:	William Voight Supervisor, Rates and Tariffs Telecommunications Department
Subject:	Staff's Recommendation to Approve AT&T Missouri's Request for Additional Numbering Resources to Accommodate the needs of RGA Reinsurance Company in the Harvester rate center.
Date:	November 29, 2010

On November 23rd, AT&T Missouri (AT&T) 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's request for additional telephone numbering resources in the Harvester, Missouri telephone rate center (Application). According to AT&T, RGA Reinsurance Company (RGA), located in St. Charles County, is in the process of expanding its business, and is in need of one thousand block of Direct Inward Dial telephone numbers. In keeping with its existing dialing sequence, RGA is requesting that the block begin with the digit "6" or "7".

According to its Application, AT&T states that it does not have the necessary telephone numbers to grant RGA's request for a consecutive block of telephone numbers. AT&T requests the Commission to override the NANPA's denial of AT&T's request for the additional telephone numbers, which denial was based on AT&T's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T currently has enough unused telephone numbers to provide service to RGA; however, the available telephone numbers are not in a sequential order, as requested by RGA.

In support of its Application, AT&T provided copies of its NANPA request and subsequent denial by the NANPA. Additionally, AT&T provided Staff highly confidential copies of its telephone number utilization for the Harvester rate center. In the Staff's opinion, AT&T has demonstrated a verifiable need for the additional telephone numbers, and Staff recommends the Commission approve AT&T's request and order a reversal of the NANPA decision to deny the numbers for RGA.

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

"AT&T's request for one, thousands-block of telephone numbers beginning with either a "6" or "7" in the Harvester, Missouri rate center is granted."

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

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Case No. IO-2011-0150

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 Staff recommendation, and that the facts therein are true and correct to the best of his knowledge and belief.

WILLIAM VOIGHT

Subscribed and affirmed before me this <u>29</u>th day of <u>November 2010</u>

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086

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