

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

File No. IO-2013-0518

**STAFF RECOMMENDATION TO APPROVE AT&T MISSOURI'S
REQUEST FOR ADDITIONAL NUMBERING RESOURCES**

COMES NOW Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and for its Recommendation in this matter states as follows:

1. On June 13, 2013, 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 St. Louis, Missouri telephone rate center ("Application"). According to AT&T Missouri, WellPoint Inc. ("WellPoint") is consolidating several separate locations into a single facility, which will be served by a centralized PBX system. To accommodate its needs, WellPoint is in need of 5000 lines in sequential order. Specifically, the requested resources consist of five consecutive thousands-blocks within (1) the 314 NPA, and (2) the St. Louis rate center.

2. On the same date, the Commission issued an Order that directed Staff to review the Application and file a recommendation no later than June 20, 2013.

3. According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the St. Louis rate center to meet the needs of WellPoint. 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 WellPoint; however, said numbers are not in sequential order.

4. A carrier may challenge NANPA's denial of numbering resources before the Commission, and the Commission may overturn the decision where there is a verifiable need for the carrier to satisfy a specific customer request.¹

5. 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 all the documentation required under Rule 4 CSR 240-37.040(1)(A).

6. Staff has examined AT&T Missouri's request and supporting documentation. Staff's *Memorandum* attached hereto recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny additional numbering resources.

WHEREFORE, Staff recommends 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;

¹ See Rule 4 CSR 240-37.040; *Report and Order and Further Notice of Proposed Rule Making*, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; *Third Report and Order and Second Order on Reconsideration*, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, et al., December 12, 2001, paragraph 64. See also 47 CFR 52.15 (g)(3)(iv) and (g)(4).

(2) Overturns the decision of the Pooling Administrator and grants AT&T Missouri's request for telephone numbers within the 314 NPA, and the St. Louis rate center; and

(3) Contains the following language:

AT&T Missouri's request for five consecutive thousands-blocks within the 314 NPA, in the St. Louis, 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 five blocks of one thousand numbers and return the remaining five blocks to the Pooling Administrator.

Respectfully submitted,

/s/ Jennifer Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically or by First Class United States Postal Mail, postage prepaid on this 18th day of June 2013, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Jennifer Hernandez

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2013-0518

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for Additional Numbering Resources to accommodate the needs of WellPoint, Inc. in the St. Louis rate center.

Date: June 14, 2013

On June 13th, 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 St. Louis, Missouri telephone rate center (Application). According to AT&T Missouri, WellPoint Inc. (WellPoint) is consolidating several separate locations into a single facility, which will be served by a centralized PBX system. To accommodate its needs, WellPoint is in need of 5000 lines in sequential order. Specifically, the requested resources consist of five consecutive thousands-blocks within (1) the 314 NPA, and (2) the St. Louis rate center.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the St. Louis rate center to meet the needs of WellPoint. 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 WellPoint; 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 St. Louis 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 WellPoint.

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

AT&T Missouri's request for five consecutive thousands-blocks within the 314 NPA, in the St. Louis, 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 five blocks of one thousand numbers and return the remaining five blocks to the Pooling Administrator.

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

A handwritten signature in cursive script that reads "Kari Salsman".

KARI SALSMAN