

**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)	<u>File No. IO-2019-0217</u>
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 24, 2019, 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 Thousands-Block Pooling Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri to support the expanding telecommunications needs of St. Luke's Health System's hospital in Kansas City. More specifically, St. Luke's is expanding its voice network to serve its health system in the greater Kansas City area and 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 1,000 consecutive numbers within the 816 Numbering Plan Areas (NPA) with a 816-XX2-XXXX range of 0000-9989. AT&T has no numbering resources meeting the criteria and therefore, requests a one-thousands block from which blocks of 100 consecutive numbers can be drawn.

2. AT&T states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied its request for the additional telephone numbers based on AT&T's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined AT&T's request and supporting documentation. In Staff's opinion, AT&T has demonstrated a verifiable need for the additional telephone numbers and complied with 4 CSR 240-28.016. Staff recommends the Commission approve AT&T's request and order a reversal of the NANPA decision to deny the additional numbers.

WHEREFORE, 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 designated area; and

(3) Contains the following language:

Grant AT&T Missouri's request for 1000 consecutive numbers within the 816 NPA, with a XX2-XXXX range of 0000-9989, in the Kansas City, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying AT&T Missouri's original request.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 7th day of February, 2019, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2019-0217

From: Kari Salsman, Utility Policy Analyst 1
John VanEschen, Utility Regulatory Manager
Telecommunications Department

Subject: Staff's Recommendation to Approve Southwestern Bell
Telephone Company d/b/a AT&T Missouri's Request for
Additional Numbering Resources to accommodate the
Needs of St. Luke's Hospital in the Kansas City rate center.

Date: February 7, 2019

On January 24th, 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 Kansas City, Missouri telephone rate center (Application). According to AT&T Missouri, St. Luke's Hospital (St. Luke's) is expanding its voice network at its Kansas City location. With this expansion, St. Luke's is in need of 1,000 consecutive numbers that will work with their internal dial plan and be consistent with St. Luke's larger voice network serving its operations in Missouri. Specifically, St. Luke's is in need of a 1,000 consecutive numbers, within the 816 NPA, the Kansas City rate center, and the 417-XX2-XXXX range of 0000-9989.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Kansas City 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. 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 available telephone numbers to assign St. Luke's; however, said numbers are not in sequential order, which is necessary to work with St. Luke's internal dial plan.

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 Kansas City rate center. The Staff has examined the request of AT&T Missouri and supporting documentation.

Staff has examined AT&T Missouri's request and in the Staff's opinion, AT&T's application complies with the requirements of 4 CSR 240-28.016. AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 816 area code is the third quarter of 2025. 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 one thousands-block within the 816 NPA, with a XX2-XXXX range of 0000-9989 in the Kansas City rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying AT&T Missouri's original request.