

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Teleport            )  
Communications America, LLC for Review and        )  
Reversal of North American Number Plan            )  
Thousands-Block Pooling Administrator’s            )  
Decision to Withhold Numbering Resources         )  
**File No. LO-2023-0246**

**STAFF’S RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Recommendation*, states the following:

1. On February 1, 2023, Teleport Communications of America, LLC (“Teleport”), filed with the Missouri Public Service Commission its *Application of Teleport Communications America, LLC for Numbering Relief*. The company later supplemented its application on March 7, 2023.

2. On March 8, 2023, the Commission ordered Staff to file a recommendation regarding Teleport’s application or a status report by April 11, 2023.

3. Teleport filed its application under 47 C.F.R. 52.15(g)(3)(iv) requesting the Commission reverse the North American Numbering Plan Thousands-Block Pooling Administrator’s (“NANPA”) decision to deny Teleports request for additional telephone resources in the Kirkwood rate center. Teleport’s requested resources consist of 2,000 consecutive numbers required to meet Mercy Technology Services’ (“Mercy”) communication needs.

Teleport’s application complies with 20 CSR 4240-28.016. The Company provided copies of its request to and subsequent denial from NANPA. Teleport also provided confidential copies of its telephone number utilization for the Kirkwood rate center.

NANPA denied Teleport's request because Teleport did not adhere to their telephone number usage guidelines. NANPA required Teleport to use their available telephone numbers. Teleport indicated, however, that its available telephone numbers are not in sequential order. Teleport stated sequential order is necessary for Mercy's communications plan. Thus, Staff found that Teleport has a verifiable need for additional telephone numbers.

4. Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for Mercy.

**WHEREFORE**, Staff recommends the Commission approve Teleport's request and order that include statements substantially similar to the following:

Grant Teleport's request for 2,000 consecutive numbers within the 557 NPA, the Kirkwood rate center, and the range of 3000-8000. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.

Respectfully submitted,

**/s/ Eric Vandergriff**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 10<sup>th</sup> day of April, 2023.

**/s/ Eric Vandergriff**

## MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. LO-2023-0246

**From:** Kari Salsman, Senior Research/Data Analyst  
John VanEschen, Regulatory Compliance Manager  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve Teleport Communications America, LLC's Request for Additional Numbering Resources to accommodate the Needs of Mercy Technology Services in the Kirkwood rate center.

**Date:** March 31, 2023

On February 1<sup>st</sup>, Teleport Communications America, LLC (Teleport) 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 Teleport for additional telephone numbering resources in the Kirkwood rate center. According to Teleport, Mercy Technology Services is expanding its presence in Sunset Hills due to growth for business and is in need of 2,000 consecutive numbers within the 557 Numbering Plan Area (NPA), in the Kirkwood rate center, and the 557-XXX-XXXX range of 3000-8000.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Kirkwood rate center to meet the needs of Mercy and requests the Commission to override the NANPA's denial of Teleport's request for the additional telephone numbers. Denial was based on Teleport's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Teleport may very well have available telephone numbers to assign Mercy; however, said numbers are not in sequential order, which is necessary to work with Mercy's communications plan.

In support of its Application, Teleport provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Teleport provided Staff confidential copies of its telephone number utilization for the Kirkwood rate center. The Staff has examined the request and supporting documentation and in the Staff's opinion, Teleport's application complies with the requirements of 20 CSR 4240-28.016 and Teleport has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 557 area code is beyond 40 years. Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for Mercy.

Specifically, the Staff recommends the Commission's order include statements substantially similar to the following:

Grant Teleport's request for 2,000 consecutive numbers within the 557 NPA, the Kirkwood rate center, and the range of 3000-8000. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.