

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

In the Matter of the Application of MCIMetro     )  
Access Transmission Services Corp d/b/a     )  
Verizon Access Transmission Services for     )  
Review and Reversal of North American     )  
Number Plan Thousands-Block Pooling     )  
Administrator’s Decision to Withhold     )

**File No. LO-2023-0380**

**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 May 5, 2023, MCIMetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services (“Verizon Access” or the “Company”) filed an application under 47 C.F.R. 52.15(g)(3)(iv), in accordance with 20 CSR 4240-28.016 and 20 CSR 4240-2.060, requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administration (“NANPA”) to withhold certain numbering resources from Verizon Access.

Verizon Access states that its Application is prompted by the United States Department of Agriculture’s (“USDA”) plan to implement new phone service to their Microsoft Teams environment via direct routing and that the plan requires 1,500 contiguous DID<sup>1</sup> numbers in NPA 314’s St. Louis rate center. Verizon Access states that the USDA placed an order with Verizon Access for the 1,500 contiguous DID numbers with a planned in-service date of July 1, 2023. The Application states that because it lacked a 1,500 block of contiguous DID numbers in NPA 314 to meet the

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<sup>1</sup> “Direct Inward Dialing”

USDA's needs, on March 31, 2023, it submitted a request to the NANPA for two contiguous thousands blocks in the St. Louis Missouri rate center.<sup>2</sup> On March 31, 2023, the NANPA denied the request on the grounds that Verizon Access had not met the utilization and/or months-to-exhaust criteria established by the Federal Communications Commission ("FCC"). Verizon Access seeks the Commission's order overturning the NANPA's decision to withhold the numbering resources. The Company also asked for expedited treatment in accordance with 20 CSR 4240-2.080(14).

2. A state commission may overturn the NANPA's decision based upon a determination that the carrier has demonstrated a verifiable need for the requested number resources and has exhausted all available remedies. See 47 CFR Section 52.15(g)(4)(iv)<sup>3</sup>. Staff has examined Verizon Access' request and supporting documentation. In Staff's opinion, Verizon Access has demonstrated a verifiable need for the additional telephone numbers and complied with 20 CSR 4240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the additional numbers. Staff further recommends that the Commission's order include statements substantially similar to the following:

The Commission grants Verizon Access' request for 1,500 consecutive numbers within the 557 NPA, in the St. Louis rate center. This decision reverses a recent decision by the North American

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<sup>2</sup> The 314 area code has exhausted therefore the numbers assigned would be from the overlay area code of 557.

<sup>3</sup> "The NANPA shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The NANPA shall not issue numbering resources to a carrier without an OCN. The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."

Numbering Plan Thousands-Block Pooling Administrator denying Verizon Access' original request.

**WHEREFORE**, Staff recommends that the Commission issue an order that:

1. Determines Verizon Access has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies;
2. Reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon Access' original request; and
3. Grants Verizon Access' request for 1,500 consecutive numbers within the 557 NPA, in the St. Louis rate center.

**Respectfully Submitted,**

/s/ Paul T. Graham #30416

Senior Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Mo 65102-0360  
(573) 522-8459  
[Paul.graham@psc.mo.gov](mailto:Paul.graham@psc.mo.gov)

Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all persons who have entered an appearance of record in this matter on this May 23, 2023, by electronic filing in EFIS.

/s/ Paul T. Graham

## MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. LO-2023-0380

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

**Subject:** Staff's Recommendation to Approve MCIMetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services Request for Additional Numbering Resources to accommodate the needs of the United States Department of Agriculture in the St. Louis rate center.

**Date:** May 19, 2023

On May 5<sup>th</sup>, MCIMetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services (Verizon) 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 Verizon for additional telephone numbering resources in the St. Louis rate center. According to Verizon, the United States Department of Agriculture (USDA) is implementing new phone service to their Microsoft Teams environment via direct routing and is in need of 1,500 consecutive numbers within the 314 Numbering Plan Area (NPA), in the St. Louis rate center.<sup>1</sup>

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

In support of its Application, Verizon provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Verizon provided Staff confidential copies of its telephone number utilization for the St. Louis rate center. The Staff has examined the request and supporting documentation and in the Staff's opinion, Verizon's application complies with the requirements of 20 CSR 4240-28.016 and the company has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 557 area is beyond 30 years. Staff recommends the

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<sup>1</sup> Verizon's application seeks numbers in the 314 area code. Due to an exhaust in the 314 area code and the overlay of the 557 area code in this area, the 1,500 consecutive numbers will need to be assigned from the 557 area code.

Commission approve Verizon's request and order a reversal of the NANPA decision to deny the additional numbers for USDA.

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

Grant Verizon's request for 1,500 consecutive numbers within the 557 NPA, in the St. Louis rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.