

**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	)	Case No. _____
Number Plan Thousands-Block Pooling	)	
Administrator's Decision to Withhold Numbering	)	
Resources	)	

**AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW AT&T Missouri<sup>1</sup> and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. ("NANPA"), to withhold certain numbering resources from AT&T Missouri.

The requested numbering resources are necessary to meet the needs of Lockton Companies LLC ("Lockton"), located in Kansas City, Missouri. The resources consist of two (2) thousands-blocks that (1) are within the 816 NPA, (2) are within the Kansas City (KSCYMO05DSO) rate center, and (3) are such that each of the two thousands-blocks have identical XXXX ranges of 4000-4999, 5000-5999 or 6000-6999 (i.e., two full thousands-blocks, each with matching XXXX ranges from 4000-4999, 5000-5999 or 6000-6999). The requested thousands-blocks are necessary to meet Lockton's expanding telecommunications-related needs. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet Lockton's needs.

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<sup>1</sup> Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri"). AT&T Missouri files this verified Application and motion for expedited treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv).

In support of this Application, AT&T Missouri states as follows:

1. AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. AT&T Missouri is authorized to do business in Missouri<sup>2</sup> and its fictitious name is duly registered with the Missouri Secretary of State.<sup>3</sup> AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo 2000.<sup>4</sup>

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Timothy P. Leahy  
Leo J. Bub  
Robert J. Gryzmala  
Attorneys for Southwestern Bell Telephone Company  
d/b/a AT&T Missouri  
One AT&T Center, Room 3516  
St. Louis, Missouri 63101

3. Lockton is a large insurance brokerage firm which offers a wide variety of risk management, insurance and other services. Lockton is located at 444 West 47<sup>th</sup> Street in Kansas City, Missouri and is in the process of expanding its facilities to include an additional location at

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<sup>2</sup> In accordance with 4 CSR 240-2.060(1) and (G), a certified copy of Southwestern Bell Telephone Company's Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044.

<sup>3</sup> In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

<sup>4</sup> Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company d/b/a AT&T Missouri. See, Order Granting Expedited Treatment and Approving Tariffs, Case No. TO-2002-185, issued June 29, 2007.

4800 Main Street in Kansas City. In connection with its expansion, Lockton is upgrading its telecommunications system and facilities and, more specifically for purposes of this Application, will require an additional 2,000 Direct Inward Dial ("DID") numbers.

4. A copy of the November 15, 2007, letter from Mr. David E. Shively, Vice-President, Corporate Telecommunications Manager, to AT&T Missouri is attached hereto and marked as Exhibit A. As noted in the letter, Lockton needs "1,000 additional sequential numbers in 2 prefixes for a total of 2,000 additional DIDs." Each of its employees using these numbering resources will be assigned "a telephone number and a direct fax number for electronic fax delivery and distribution. The last four-digits assigned for the fax number [should] match the last four-digits assigned for the telephone number with different prefixes." As Mr. Shively further explains, "[t]o accommodate our current dial plan the last four digits would need to begin with 4, 5 or 6."

5. AT&T Missouri has researched the available blocks in its Kansas City rate center (KSCYMO05DSO) which serves Lockton's location. AT&T Missouri has determined that it has no thousands-blocks available in order to meet Lockton's needs.

6. As a result of this research, AT&T Missouri requests that the Commission grant it numbering resources consisting of two (2) thousands-blocks that (1) are within the 816 NPA, (2) are within the Kansas City rate center, and (3) are such that each of the two thousands-blocks have identical XXXX ranges of 4000-4999, 5000-5999 or 6000-6999 (i.e., two full thousands-blocks, each with matching XXXX ranges from 4000-4999, 5000-5999 or 6000-6999). AT&T Missouri has determined that the numbering resources requested herein would be compatible with Lockton's telecommunications service requirements. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri



specifically requests that the Commission grant it any other suitable numbering resources that meet Lockton's needs.

7. On December 7, 2007, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Lockton's needs. A copy of the Application is attached hereto and is marked as Exhibit B. AT&T Missouri completed the Application in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet, a copy of which is attached hereto and marked as Exhibit C.

8. On or about December 7, 2007, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization criteria. A copy of that decision is attached hereto and marked as Exhibit D.

9. AT&T Missouri seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases and AT&T Missouri respectfully submits that it should likewise do so here.

10. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000, Order in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources.<sup>5</sup> Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold

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<sup>5</sup> 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; *see also*, 47 CFR 52.15(g)(3)(iv).

numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein.”<sup>6</sup> Moreover, the FCC determined that states may overturn NANPA’s decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request:

We also agree with WinStar that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.<sup>7</sup>

11. The FCC further explained in its March 31, 2000, Order that a “[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center” and that states “may grant requests for customers seeking contiguous blocks of numbers.”<sup>8</sup> Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated “in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.”<sup>9</sup>

12. Further, this Application complies with 4 CSR 240-37.040. AT&T Missouri has attached hereto its “Months-to-Exhaust Worksheet” indicating the utilization for the Kansas City rate center (KSCYMO05DSO) encompassing both the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-37.040(1)(A)1. *See*, Exhibit C. AT&T Missouri has also attached hereto its most recently-filed FCC Form U1 of Form 502 for this rate center. 4 CSR 240-37.040(1)(A)2. *See*, Exhibit E(HC). Finally, AT&T Missouri

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<sup>6</sup> *Id.*

<sup>7</sup> 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)(4).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* at paragraph 66.

attaches copies of its originally-filed request to NANPA (i.e., its Thousands-Block Application Form, Part 1A) and NANPA's denial of that request. 4 CSR 240-37.040(1)(A)3. *See*, Exhibits B and D, respectively. These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, AT&T Missouri has exhausted all other available remedies designed to conserve numbering resources. 4 CSR 240-37.040(1)(A)4.

13. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application. Moreover, AT&T Missouri has no pending actions which satisfy the listed criteria in Arkansas, Kansas, Missouri or Oklahoma. AT&T Missouri (which operates in Texas under the fictitious name AT&T Texas) has six pending formal complaints or lawsuits from end-user customers in Texas which involve retail customer service or rates.<sup>10</sup> (Additionally, AT&T Missouri is involved in various actions involving terms and conditions of interconnection agreements with competitive local exchange telephone companies that are in various stages of litigation or appeal.).

14. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.

15. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within thirty (30) days. Lockton reports that it "wish[es] to secure numbers and

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<sup>10</sup> The pending lawsuits in Texas involving customer service or rates are (1) Irving's Holding, Inc. v. SBC Communications, Inc., Docket No. CC-05-07415-C and (2) David Lavine, M.D. and David Lavine, M.D., P.A. d/b/a Center for Cosmetic and Reconstructive Surgery v. AT&T Inc., Cause No. 07-54771-2. The pending formal complaints before the Texas Public Utility Commission involving customer service or rates are as follows: (1) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34332; (2) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34940; (3) Formal Complaint Pursuant to PUC Procedural Rule 22.242 Against AT&T On Behalf Of The River Oaks Imaging, Docket No. 34511 and (4) Complaint of John J. Gitlin, Esq. Against AT&T Texas, Docket No. 34348.




begin assignment and transition as soon as possible, as we are rapidly depleting our current assignment block of 816-960-9000 through 9999." Exhibit A. In order to accommodate Lockton's needs, the Commission must issue its order expeditiously, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of the numbering resources to AT&T Missouri described herein, both to meet Lockton's needs and so that AT&T Missouri and any other telecommunications service providers that provides service via a switch can program their switches. AT&T Missouri filed this request for expedited treatment as soon as it could have. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri's request for numbering resources and AT&T Missouri determined that it was not feasible to implement a technological alternative.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter within thirty (30) days, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Lockton Companies LLC and, in the event that the requested resources are then unavailable, to release such other suitable blocks as will meet Lockton Companies LLC's needs.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

TIMOTHY P. LEAHY #36197

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for Southwestern Bell Telephone Company  
d/b/a AT&T Missouri

One AT&T Center, Room 3516

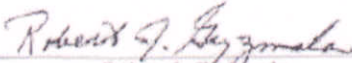
St. Louis, Missouri 63101

314-235-6060 (Telephone)/314-247-0014 (Facsimile)

[robert.gryzmala@att.com](mailto:robert.gryzmala@att.com) (E-Mail)

**CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by e-mail on December 17, 2007.

  
Robert J. Grymalak

General Counsel  
Kevin Thompson  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)  
[kevin.thompson@psc.mo.gov](mailto:kevin.thompson@psc.mo.gov)

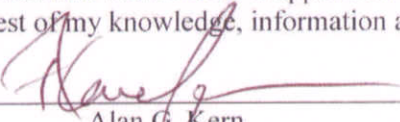
Public Counsel  
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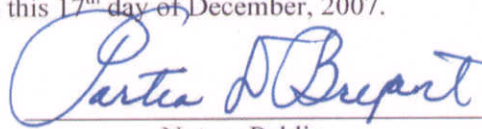
CITY OF ST. LOUIS       )  
                                      )  
STATE OF MISSOURI       )       SS

**SWORN VERIFICATION**

I, Alan G. Kern, in accordance with 4 CSR 240-2.060(1)(M), first being duly sworn upon my oath, hereby verily state that I am over the age of twenty-one years, sound of mind, and Director-Regulatory of Southwestern Bell Telephone Company, d/b/a AT&T Missouri ("AT&T Missouri"). I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read the document to which this Verification is appended. The facts contained therein are true and correct according to best of my knowledge, information and belief.

  
\_\_\_\_\_  
Alan G. Kern

Sworn and subscribed to before me this 17<sup>th</sup> day of December, 2007.

  
\_\_\_\_\_  
Notary Public

PORTIA D. BRYANT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for St. Louis County  
My Commission Expires: June 09, 2011  
Commission Number: 07388013



November 15, 2007

AT&T  
Attn: Laurie Adame  
712 E. Huntland Drive, Room 313  
Austin, TX 78752

RE: Additional DID Number Request

Dear Laurie:

Lockton Companies is expanding our office located at 444 W. 47<sup>th</sup> Street, Kansas City, MO 64112 to include space located at 4800 Main Street, Kansas City, MO. Each Associate is assigned a telephone number and a direct fax number for electronic fax delivery and distribution. The last four-digits assigned for the fax number match the last four-digits assigned for the telephone number with different prefixes.

Our goal is to maintain the PBX four-digit dialing pattern and corresponding automated fax delivery system by securing enough additional numbers to accommodate our anticipated growth for the next five years.

We are requesting 1,000 additional sequential numbers in 2 prefixes for a total of 2,000 additional DIDs. To accommodate our current dial plan the last four digits would need to begin with 4, 5 or 6. With minor to moderate dial plan modification we can accommodate using 3 or 7. We can not use 0, 1, 2, 8 or 9.

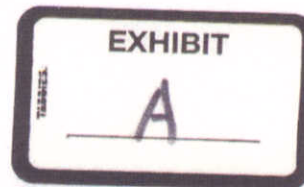
We wish to secure numbers to begin assignment and transition as soon as possible, as we are rapidly depleting our current primary assignment block of 816-960-9000 through 9999. Actual occupation of the new location will occur late May, 2008.

If additional information is required, please contact me at 816-960-9183, fax 816-783-9183 or email [dshiveley@lockton.com](mailto:dshiveley@lockton.com).

Respectfully,

David E. Shiveley  
VP, Corporate Telecommunications Manager

LOCKTON COMPANIES, LLC  
444 W 47th St, Ste 900 / Kansas City, MO 64112-1906  
816-960-9000 / FAX: 816-960-9099  
[www.lockton.com](http://www.lockton.com)



Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

## Thousands-Block Application Form

### Part 1A

Type of Application (check one): ☒ New ☐ Change<sup>i</sup> ☐ Disconnect

#### GENERAL APPLICATION INFORMATION

##### 1.1 Contact Information:

###### Block Applicant:

Company Name: AT&T-SOUTHWEST  
Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583  
Contact Name: CONNIE MCNAUGHTON/G. DEWBERRY  
Contact Address: 2600 CAMINO RAMON, 1S900 E City SAN RAMON State CA Zip 94583  
Phone: 925 824-5627 Fax: 925 355-9268 E-Mail: cm3123@att.com

###### Pooling Administrator<sup>ii</sup>:

Contact Name: GENEVIEVE PAULINO  
Contact Address: 800 SUTTER STREET, Suite 571 City CONCORD State CA Zip 94520  
Phone: 925-363-7652 Fax: 925-363-7683 E-Mail: genevieve.paulino@neustar.com

##### 1.2 General Information

Check one: No LRN needed ☒ X LRN needed<sup>iii</sup> \_\_\_\_\_

NPA: 816 LATA: 524 OCN<sup>iv</sup>: 9533 Parent Company's OCN 9533  
Number of Thousands-Blocks Requested: 2

Switch Identification (Switching Entity/POI)<sup>v</sup>: KSCYMO05DS0 City or Wire Center Name \_\_\_\_\_  
Rate Center<sup>vi</sup>: KANSASCITY Rate Center Sub Zone: \_\_\_\_\_

##### 1.3 Dates

Date of Application<sup>vii</sup>: 12/07/2007 Requested Block Effective Date<sup>viii</sup>: 45 DAY  
Request Expedited Treatment? (See Section 8.6) Yes ☒ X No \_\_\_\_\_

##### 1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: ILEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: WIRELINE
- c) Thousands-Block(s) (NXX-X) assignment preference (optional) 2 DIFFERENT NXX'S WITH SAME BLOCKS, EITHER 4,5,6
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any CUSTOMER CAN'T USE BLOCKS 0,1,2,8,9
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) \_\_\_\_\_.

##### 1.5 Type of Request

Initial block for rate center: Yes \_\_\_\_\_, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days



Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

**Thousands-Block Application Form  
Part 1A**

Growth block for rate center: Yes XXX, If Yes, attach months to exhaust worksheet

Change block: Yes \_\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:  
\_\_\_\_\_

Disconnect block: Yes \_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks: DEDICATED CUSTOMER - LOCKTON INSURANCE - EXPEDITING THROUGH NEUSTAR

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066.

SIGNATURE ON FILE  
Signature of Block Applicant

CODE ADMINISTRATOR  
Title

12/07/2007  
Date

## Thousands-Block Application Form Part 1A

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**Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under “Block Applicant” the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>ix</sup>. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: \_\_\_\_\_

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ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

Foot Notes:

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<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>ix</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.



# Appendix 3 - Modified August 6, 2001

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level 1 (Thousands-Block Number Pooling Growth Block Request)

Date: 12/07/2007 OCN: 9533 Company Name: AT&T-SOUTHWEST

Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA-NXX (267) NPA-NXX-X (661)

Name of Block Applicant: CONNIEMCNAUGHTON/GWEN DEWBERRY Signature: SIGNATURE ON FILE

Title: CODE ADMINISTRATOR Telephone No.: (925) 824-5627 FAX No.: (925) 355-9268 E-Mail: cm3123@ATT.COM

A. Available Numbers: 379879

B. Assigned Numbers: 827362

C. Total Numbering Resources: 1356988

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0  
List excluded Code(s) or Block(s): 0

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months <sup>2</sup>	-2875	-2273	-11564	13269	-10058	-2021						
F. Forecast – Next 12 months <sup>3</sup>	0	1318	3885	0	1658	2010	1530	2071	2146	347	0	264

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 1478.5

H. Months to Exhaust<sup>4</sup>  $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \frac{256.935}{}$

I. Utilization<sup>5</sup>  $\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = \frac{60.97\%}{}$

Explanation: - FORECAST Actual Value M1 (- 16818) Actual Value M4 (- 1667) Actual Value M11 (-1589) DEDICATED CUSTOMER

1 A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

2 Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

3 Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

4 To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

5 Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

816-KANASCITY-MO      2 BLOCK REQUEST      LOCKTON INSURANCE

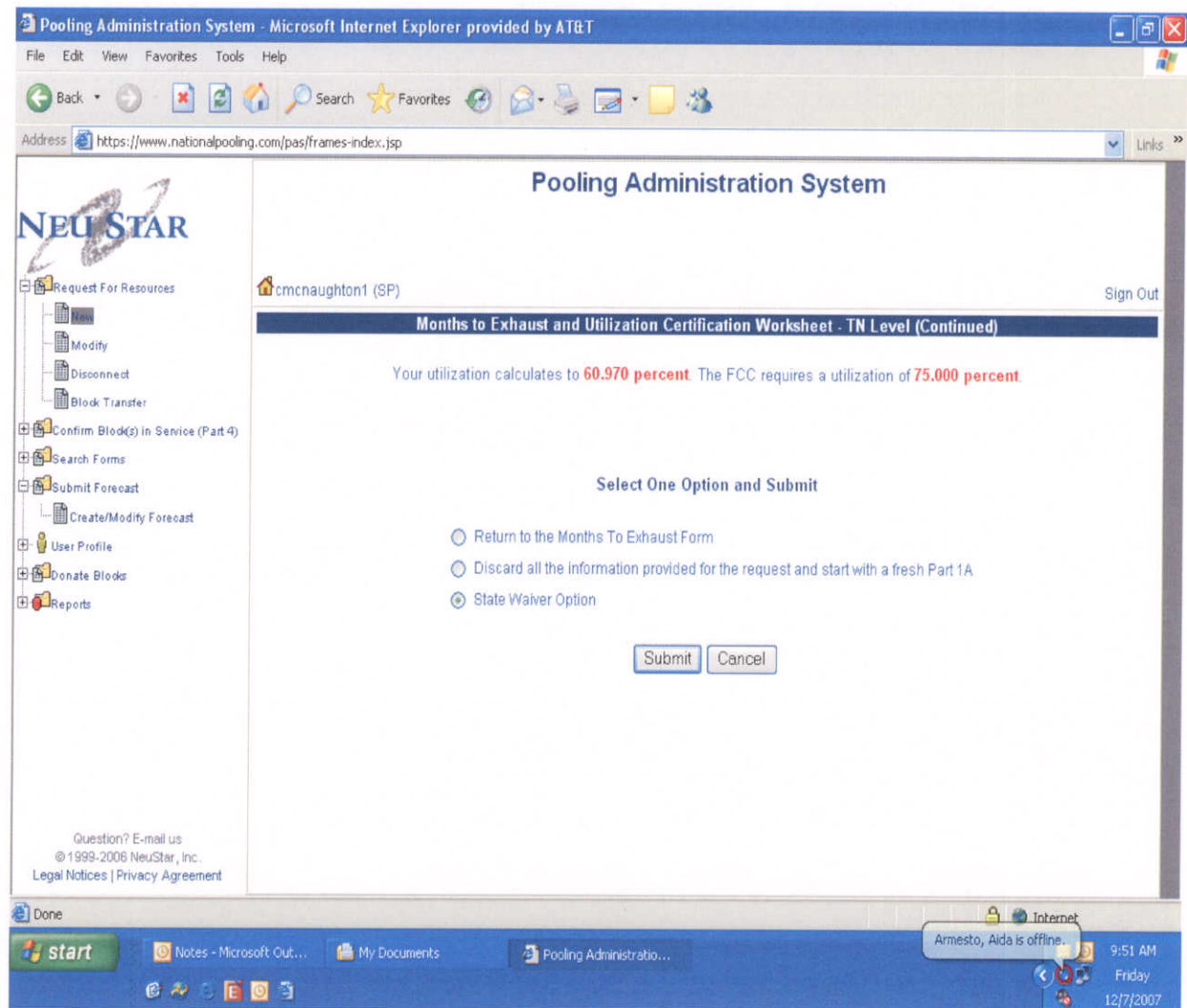


EXHIBIT D

**EXHIBIT E**  
**IS**  
**HIGHLY CONFIDENTIAL**  
**IN ITS ENTIRETY**