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 Missouri¹ and respectfully requests that the Commission issue an Order, on an expedited basis, 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 expanding telecommunications needs of the General Services Administration, acting on behalf of the Department of the U.S. Navy ("GSA"), located at the Inshore Boat Facility, Army Reserve Center, 7301 South Highway 94, in Saint Charles County, Missouri. These resources consist of a one thousands-block from which two hundred (200) consecutive numbers can be drawn within (1) the 636 NPA, and (2) the Harvester rate center. AT&T Missouri further requests that if such specific resources are not available when the Commission issues its order, the Commission should direct NANPA to provide such resources as are available to meet GSA's numbering resource needs.

¹ 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 Delaware 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 Missouri² and its fictitious name is duly registered with the Missouri Secretary of State. 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.
- 2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Leo J. Bub Robert J. Gryzmala Attorneys for Southwestern Bell Telephone Company d/b/a AT&T Missouri One AT&T Center, Room 3520 St. Louis, Missouri 63101

3. This Application is prompted by GSA's request made to meet the expanding telecommunications needs of the Department of the Navy. As a result, GSA is in need of additional numbering resources. A letter from Mr. Kenneth Melvin, representing GSA's Federal Telecommunications Service, outlines GSA's need for 200 additional lines to support a new PBX system to be installed on February 28, 2013 where currently there is no service. *See*,

² 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. The company has since been converted into a Delaware corporation. *See*, Certificate of Conversion from the Missouri Secretary of State, dated October 3, 2012 (which was filed with the Commission on December 4, 2012 in Case No. IO-2013-0323).

³ 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.

Exhibit A, attached hereto. As the letter indicates, GSA is requesting 200 additional numbers in sequential order.

- 4. AT&T Missouri has researched the available numbering resources in the Harvester rate center and has determined that it has no numbers available to meet GSA's needs.
- 5. Consequently, AT&T Missouri requests that the Commission grant it numbering resources consisting of a one thousands-block from which two hundred (200) consecutive numbers can be drawn within (1) the 636 NPA, and (2) the Harvester rate center.
- 6. On February 11, 2013, AT&T Missouri submitted a Thousands-Block
 Application Form, Part 1A, for the numbering resources assignment necessary to meet GSA's needs. A copy of the Application is attached hereto 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 as Exhibit C.
- 7. On February 21, 2013, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization and/or months-to-exhaust criteria. A copy of that decision is attached hereto as Exhibit D.
- 8. 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.
- 9. 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.⁴ Thus, the Commission has the authority to "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." 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.⁶

- 10. The FCC further explained in its March 31, 2000, <u>Order</u> 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." 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."
- 11. 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 Harvester rate center encompassing both the preceding six months and projected monthly utilization for the

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⁴ 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).

⁶ 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).

⁸ *Id.* at paragraph 66.

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 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.

- 12. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court which involve Missouri retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application. AT&T Missouri has one pending action against it in Missouri, brought by end-user customers, which involves retail customer service or rates.⁹
- 13. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.
- 14. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within ten (10) business days. GSA has explained that these numbers are needed "to support a new PBX system that has been ordered by The Department of the Navy and will be installed on February 28, 2013." *See*, Exhibit A. In order to accommodate GSA's needs, the Commission must issue its order expeditiously, so that although AT&T Missouri cannot provide the numbering resources when immediately needed, it can do so soon thereafter, following the filing of a new request with NANPA for the release of the numbering resources to AT&T Missouri

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⁹ Barry Road Associates, Inc. d/b/a Minsky's Pizza, et al. v. Southwestern Bell Telephone Company, d/b/a AT&T Missouri, et al., Case No. 1016CV02438, Jackson County Circuit Court.

described herein. AT&T Missouri filed this request for expedited treatment as soon as it could have 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 ten (10) business days, and instruct NANPA to release the numbering resources described herein. AT&T Missouri further requests that if such specific resources are not available when the Commission issues its order, the Commission should direct NANPA to provide such resources as are available to meet the numbering resource needs of the Department of Navy.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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 3520

St. Louis, Missouri 63101

314-235-6060 (tn)/314-247-0014 (fax)

robert.gryzmala@att.com

COUNTY OF COLE)	~~
STATE OF MISSOURI)	SS

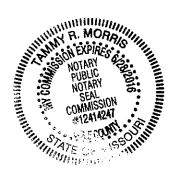
VERIFICATION

I, Timothy M. Judge, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and Area Manager-Regulatory of AT&T Services, Inc. I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.

Timothy M. Judge

Sworn and subscribed to before me this <u>25th</u> day of <u>February</u>, 2013.

Notary Publid



CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by email on February 25, 2013.

Robert J. Lygmala

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

Office Of The Public Counsel P.O. Box 7800 Jefferson City, MO 65102 opcservice@ded.mo.gov



GENERAL SERVICES ADMINISTRATION FEDERAL TELECOMMUNICATIONS SERVICE 1222 Spruce Street ST. LOUIS, MO 63103

January 30, 2013

TO: Ms Leticia Campbell

Dear Leticia,

The General Services Administration, a federal government agency, on behalf of The Department of the Navy (SPAWARSYSCEN) Yorktown, will require new ISDN-PRI telephone service from AT&T at the Inshore Boat Facility, Army Reserve Center, 7301 South Highway 94, Saint Charles County, Missouri. This service will be required to support a new PBX system that has been ordered by The Department of the Navy and will be installed on February 28, 2013. This service will be provided via a new AT&T PRI as this location presently has no service provided. We are requesting that AT&T provide a block of 200 consecutive DID telephone numbers on or before the February 28, 2013 installation date to meet the needs of this customer. It is our understanding from AT&T that there are no available telephone numbers to meet our request for service. AT&T is our chosen service provider and we understand that they might escalate to the state utility commission. The block of 200 consecutive DID telephone numbers will meet the 12 month needs of the Department of the Navy and the long term plan will be to add additional numbers as the site grows by the Navy mission. There is not a digit restriction or preference requested.

It is important that we know whether these numbers will be made available as soon as possible as this impacts the installation of the new telephone system at the NAVY Training site.

Thank you for your prompt attention to this request.

Sincerely, //S//
Kenneth Melvin

TBPAG Attachment 1 – February 11, 2008 ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Type of Application (check one):	X□ New	□ Change ⁱ	□ Disconnect
<u>GENER</u>	AL APPLICATIO	N INFORMATION	
1.1 Contact Information:			
Block Applicant:			
Company Name: <u>AT&T CORPORATI</u>			
Headquarters Address: <u>2600 CAMINO R</u>	AMON_City <u>SA</u>	<u>N RAMON</u> _StateC	<u>CA</u> Zip <u>94583</u>
Contact Name: PATTY BERRIS	N. OCZEONANA	C'A CANDAMON	State CA 7: 04592
Contact Address: 2600 CAMINO RAMO		City <u>SAN RAMON</u>	State_ <u>CA</u> Zip94583
Phone: 925-901-1934 Fax: 925-			
E-Mail: <u>pb1986@att.com</u>			
Pooling Administrator ⁱⁱ :			
Contact			
Name: _ Genevieve Bettiga			
Contact Address: 1800 SUTTER STREET	Γ, SUITE 571 _Cit	y_CONCORD State_	<u>CA</u> Zip 94520
Phone: <u>925-363-8742</u>	Fax: _	925-363-7686	
E-Mail: <u>genevievebettiga@neustar.biz</u>			
1.2 General Information			
1.2 General information			
Check one: No LRN needed X	LRN needediii		
NPA: 636 LATA: 520 OC		arent Company's OCN_	9533
Number of Thousands-Blocks Requested: _	1		
	T. V	5 .00	
Switch Identification (Switching Entity/PO	1)': _WDSPMO01	DS0City or W	ire Center Name
Rate Center ^{vi} : _HARVESTER	Rate (enter Sub Zone:	
1.3 Dates			
Date of Application ^{vii} :02/20/2013			iii:
Request Expedited Treatment? (See Section	n 8.6) Yes_X_	No	
145 60 1 5 11 5 4	41 751 1 15		
1.4 Type of Service Provider Requesting	g the Thousands-B	slock:	
a) Type of Service Provider:LEC		(I F(TIXC CMRS Other)
b) Primary type of service Blocks to be	used for WIRE	LINE	, 1110, CIVIIW, OHIOI)
c) Thousans-Block(s) (NXX_X) prefer			
d) Thousands-Block(s) (NXX-X) that	are undesirable for	this assignment, if any	
e) If requesting a code for LRN purpos			oing (the remainder of the bl
be given to the pool)		.,,	

Tracking Number: ____

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Thousands-Block Application Form

Part 1A
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
Growth block for rate center: Yes_X_, 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
1.6 Block Return
 a) Is this block Contaminated: Yes or No b) If Yes how many TNs are NOT available for assignment: c) Have all new Intra SP ports been completed in the NPAC: Yes or No d) Has this block been protected from further assignment: Yes or No
Remarks:SAFETY VALVE WAIVER REQUEST – ST FRANCOIS COUNTY AMBULANCE
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) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.
PATTY BERRIS CODE ADMINISTRATOR 02/20/2013 Signature of Block Applicant Title Date

Thousands-Block Application Form Part 1A

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.
- 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 TelcordiaTM LERGTM 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 TelcordiaTM 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 CLLITM tandem of the facilities based providerTM. 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, inter-exchange carrier, CMRS. The 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.
- Section 1.6 Service Providers shall indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA must seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

Foot Notes:			
Page 3 of 4			

TBPAG Attachment 1 – February 11, 2008 ATIS-0300066.at1

Thousands-Block Application Form Part 1A

ⁱ Identify type of and reason for change(s) in Section 1.5.

ii The Pool Administrator is available to assist in completing these forms.

iii A CO Code application will also need to be submitted to the PA

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).

^v 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 CLLITM code of the switch /POI.

vi Rate Center name must be a tariffed Rate Center.

vii 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.

viii 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).

ix Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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

Date: 02/21/2013 OCN: 9533 Company Name: SOUTHWESTERN BELL

Rate Center: <u>HARVESTER</u>

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (4); NPA/NXX-X (86)

Name of Block Applicant: PATTY BERRIS Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-901-1934 FAX No.: 925-355-9268

E-Mail: pb1986@att.com

A. Available numbers: 47,342

B. Assigned numbers: 70,845

C. Total Numbering Resources: <u>126,000</u>

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None List excluded Code(s) or Block(s):

		Month #1 <u>-240</u>	Month #2 <u>-149</u>	Month #3 <u>-200</u>	Month #4 <u>30</u>	Month #5 <u>-149</u>	Month #6 <u>-225</u>	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E.	Growth History – Previous 6 months ²				_								
		<u>0</u>	<u>391</u>	1409	<u>432</u>	<u>464</u>	<u>478</u>	<u>506</u>	<u>580</u>	<u>-200</u>	<u>-190</u>	<u>-293</u>	<u>-506</u>
F.	Forecast – Next 12 months ³												
G.	Average Monthly Forecast (Sum of	f months i	#1-6 (Part	F above)	divided by	y 6): <u>5</u>	<u> 29.0</u>						
H.	Months to Exhaust ⁴	<u>N</u>	lumbers A			nent to Cu precast (G		<u>A)</u>	=	<u>89.493</u>			
I.	Utilization ⁵	Total N	<u>A</u> Iumbering	Resource	lumbers (es (C) - E D)		umbers	* 100	=	56.226%	<u>2</u>		

Explanation:

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))

From: genevieve.bettiga@neustar.biz

Sent: Thursday, February 21, 2013 10:28 AM

To: MOSELEY, PATRICIA A; BERRIS, PATTY; CODE ADMIN SBC INTERNET

SVCS; ARMESTO, AIDA D

Cc: PA_Part3@neustar.biz

Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking

Number: 636-HARVESTER-MO-614307

Pooling Administration System

Dated 21-February-2013

Email:

November 21, 2003 Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation TBPAG Part 3

636-**Tracking Number:** HARVESTER-MO-614307 Date of Application: 02/21/2013 Effective Date: Date of Date of Receipt: 02/21/2013 02/21/2013 Response: Service Provider Name: **SOUTHWESTERN BELL** (Telcordia TM LERG TM 9533 Routing Guide) OCN: Parent Company OCN: 9533 NPAC SOA SPID: **Pooling Administrator Contact Information:** 925-363-**Genevieve Bettiga** Phone: 7652 Signature of Pooling Administrator 925-363-**Genevieve Bettiga** Fax: 7683 Name (print)

genevieve.bettiga@neustar.biz

NPA-NXX or NPA- NXX-X :	Block Assigned:
	Block Reserved : Block Reservation Expiration Date : Block/Code Modified : Block/Code Disconnected :
Block Contaminated(Yes or No):	Disconnected.
If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1 Rate Center: Rate Center Sub Zone:	wdspmo01ds0 HARVESTER
X Form Complete, request denied.	
Explanation: DR-57: You do not meet the MTE and/or Utilization therefore this request for a new block is denied. requesting a State Waiver from the appropriate states this Part 3 denial. If you are in disagreement with request, please refer to the Thousands-Block Nu Administration Guidelines for the appeals proce	You may proceed with state commission using h the disposition of this umber (NXX-X) Pooling
Request withdrawn.	_
Explanation:	
Assignment activity suspended by the administr	rator.
Explanation:	
Remarks:	

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

EXHIBIT E

IS

HIGHLY CONFIDENTIAL

IN ITS ENTIRETY