

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2012-0052

From: Kari Salsman
William Voight
Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for Additional Numbering Resources to accommodate the needs of Express Scripts, Inc. in the Ladue rate center.

Date: August 29, 2011

On August 18th, 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 Administrator (NANPA) to withhold and deny AT&T Missouri's request for additional telephone numbering resources in the Ladue, Missouri telephone rate center (Application). According to AT&T Missouri, Express Scripts, Inc. (Express Scripts), is in the process of expanding its business and opening a new business location in Ladue. Express Scripts wishes to maintain their current 6-digit dialing pattern. To accommodate its needs, Express Scripts is in need of one 1000-block and one 500-block of Direct Inward Dial telephone numbers. More specifically, the requested resources consist of two consecutive thousands-blocks within (1) the 314 NPA, (2) an NXX comprised of X39, (3) XXXXs whose ranges do not begin with 0, 8, or 9, and (4) the Ladue rate center.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Ladue rate center to meet the needs of Express Scripts. AT&T Missouri requests the Commission to override the NANPA's denial of AT&T Missouri's request for the additional telephone numbers, which 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 the available telephone numbers to assign to Express Scripts; however, said numbers are not in sequential order.

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 Ladue rate center. The Staff has examined AT&T Missouri's request and supporting documentation.

The Staff has examined AT&T Missouri's request and in the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for Express Scripts.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

AT&T Missouri's request for two consecutive thousands-blocks within the 314 NPA, ideally an NXX comprised of X39, XXXXs whose ranges do not begin with 0,8, or 9, in the Ladue, Missouri rate center is granted.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined AT&T Missouri's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

Under penalty of perjury, I affirm that the above statement is true and correct.

A handwritten signature in cursive script, reading "Kari Salsman", is written over a horizontal line.

KARI SALSMAN