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)	File No. IO-2012-0052
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

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 August 18, 2011, Southwestern Bell Telephone Company, d/b/a AT&T Missouri, filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the form of one block of 1,000 numbers and one block of 500 numbers in the Ladue, Missouri rate center. 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 to meet the needs of Express Scripts, Inc.
- 2. AT&T Missouri states that it does not have sequential numbers available for assignment in the Ladue rate center to meet the needs of Express Scripts. NANPA denied AT&T's request for the additional telephone numbers based on AT&T'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.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Ladue rate center. The Staff has examined AT&T Missouri's request and supporting documentation. 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.

WHEREFORE, the Staff respectfully requests that the Commission grant AT&T's Request for Review and Reversal of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources. The Staff specifically requests that the following language be contained in the Commission's Order:

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.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of August, 2011.