

**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 the North American Numbering Plan) Case No. IO-2012-0107
Thousands-Block Pooling Administrator's Decision to)
Withhold Numbering Resources.)

PUBLIC COUNSEL'S RECOMMENDATION

COMES NOW the Office of the Public Counsel (Public Counsel) and advises the Public Service Commission that the Office of the Public Counsel supports AT&T's request that the Commission direct the North American Numbering Plan Thousands-Block Pooling Administrator, Neustar, Inc., to release additional numbering resources to AT&T for use by AT&T to serve Saint Luke's East Hospital ("Saint Luke") located in Lee's Summit, Missouri.

Public Counsel believes that the request for numbering resources has considerable merit. The requested blocks will facilitate Saint Luke's growth while preserving a simplified and coordinated dialing pattern enabling efficient and easy-to-use telecommunications service throughout the facility for the benefit of patients, visitors, physicians and administrative personnel. Further, the request advances the interest of the general public in Saint Luke's regional service area through the use of a simplified dialing pattern which reduces the potential for confusion, inconvenience and unnecessary long-distance charges associated with misdialed calls. Granting the request is consistent with the public interest.

Based on AT&T's October 6, 2011, application and attached documentation as well as independent contact with Saint Luke, Public Counsel offers the following in

support of AT&T's request for reversal of the North American Numbering Plan Administrator's decision to withhold numbering resources.

1. The request will not waste numbering resources since St. Luke has nearly exhausted its current numbering resource allocation;
2. The request is necessary to maintain the Hospital's current coordinated dialing pattern which assigns unique station numbers across Hospital facilities served by different central offices;
3. Maintaining the Hospital's current coordinated dialing pattern reduces confusion, improves efficiency and enhances the Hospital's accessibility to Missouri residents and the general public;
4. The request provides flexibility in conserving central office codes since the Hospital is willing to accept any available sequence of 300 numbers from the Lee's Summit rate center which have a central office code ending in "7" and station numbers with a range from 6000 through 8999;
5. The review process allows the Commission to override the administrator when the strict application of the guidelines would not be proper and in keeping with the public interest. This is an appropriate case for the Commission to exercise its authority.

For these reasons, Public Counsel suggests to the Commission that the granting of this request for St. Luke is consistent with number conservation goals, provides needed numbering resources for the Hospital, will result in a benefit to consumers and to the public, and is otherwise consistent with the public interest.

Respectfully submitted,

OFFICE OF THE Public Counsel

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 17th day of October 2011:

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