

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Windstream)	
Missouri, Inc. for Review and Reversal of)	
North American Number Plan Thousands-Block)	<u>File No. IO-2015-0303</u>
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 May 18, 2015, Windstream Missouri, Inc. 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 Windstream in the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia, Missouri rate centers. More specifically, the requested resources consist of one NXX for each recipient switch or Point of Interconnection in each of the rate centers listed above in order to obtain necessary Local Routing Numbers to install new number portability capable packet switches. Windstream will retain only one thousand-number block from each NXX ten-thousands-block and return the other 9000 numbers to NANPA.

2. Windstream states that it does not have the numbers available for assignment in the listed rate centers to meet its needs for these network upgrades. NANPA denied Windstream's request for the additional telephone numbers based on Windstream's inability to meet the guidelines pertaining to current telephone number

utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not meet the required criteria.

3. Windstream provided the Staff with its telephone number utilization for the listed rate centers. The Staff has examined Windstream's request and supporting documentation. In the Staff's opinion, Windstream has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers.

WHEREFORE, the Staff recommends that the Commission issue an order that:

(1) Determines Windstream has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2) Overturns the decision of the Pooling Administrator and grants Windstream's request for telephone numbers in the listed rate centers, and

(3) Contains the following language:

Windstream's request for eight LRNs and eight NXXs, in the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia, Missouri rate center are granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.

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 26th day of May, 2015.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2015-0303

From: Kari Salsman
Telecommunications Unit
John VanEschen
Tariff, Safety, Economic and Engineering Analysis

Subject: Staff's Recommendation to Approve Windstream Missouri's Request for Additional Numbering Resources to accommodate the deployment of a Broadband Stimulus Project.

Date: May 21, 2015

On May 18th Windstream Missouri (Windstream) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny Windstream's request for additional telephone numbering resources in the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia, Missouri telephone rate centers (Application). According to Windstream, additional numbering resources are necessary to support the broadband stimulus project. Windstream is installing new packet switches in the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia, Missouri rate centers to support the project. Windstream must establish a unique LRN to identify each recipient switch or POI and must establish one LRN per LATA from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain separate LRN's for each of these eight new packet switches. Only an NXX code holder can obtain an LRN which necessitates Windstream's request for eight separate NXX codes. Windstream will retain only single thousand-number-block from each of these new NXX codes.

Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the Broadband Stimulus project.

In support of its Application, Windstream provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Windstream provided Staff highly confidential copies of its telephone number utilization for the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia rate center. The Staff has examined Windstream's request and supporting documentation.

The Staff has examined Windstream's request and in the Staff's opinion, Windstream's application complies with the requirements of 4CSR240-37.040. Windstream has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers for the Broadband Stimulus project.

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

Windstream's request for eight LRNs and eight NXXs, in the Crocker, Dixon, Gallatin, Greenville, Piedmont, Purdy, Stover and Vandalia, Missouri rate center are granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.

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

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

KARI SALSMAN