

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

In the Matter of the Application of Windstream     )  
Missouri, LLC for Review and Reversal of the     )  
Decision of Nuestar, Inc. as the Pooling            )  
Administrator to Withhold Numbering Resources    )

**File No. IO-2018-0203**

**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 January 24, 2018, Windstream Missouri, LLC 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 Missouri in the Union Star, Missouri rate center to support the deployment of a Connect America Fund Phase 2 (CAF2) project. More specifically, Windstream is installing new packet switches and must establish a unique Location Routing Number (LRN) to identify each recipient switch or point of interface 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 an LRN for this new packet switch. Only an NXX code holder can obtain an LRN which necessitates Windstream's request for an NXX code for the Union Star rate center. Windstream will retain only a single thousand-number-block from this new NXX code.

2. Windstream Missouri states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied Windstream Missouri's

request for the additional telephone numbers based on Windstream Missouri's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream Missouri may very well have the available telephone numbers; however, said numbers do not meet the required criteria. Windstream Missouri has been unable to obtain the LRN, NXX code and thousand number block which it states are required for deployment of the CAF2 project.

3. Windstream Missouri has requested that the Commission act on its request within 10 business days pursuant to the Federal Communication Commission's order 01-362 directing NANPA to respond to requests within 10 business days. Staff recommends that this request is reasonable.

4. Windstream Missouri provided Staff with its Motion to Exhaust worksheets indicating the telephone number utilization of the covered rate centers. Staff has examined Windstream Missouri's request and supporting documentation. In Staff's opinion, Windstream Missouri has demonstrated a verifiable need for the additional telephone numbers and complied with 4 CSR 240-37.040. Staff recommends the Commission approve Windstream Missouri's request and order a reversal of the NANPA decision to deny the additional numbers.

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

- (1). Determines Windstream Missouri 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 Missouri's request for telephone numbers in the listed rate center; and

(3) Complies with the Federal Communication Commission's suggestion of action within 10 business days; and

(4). Contains the following language:

Windstream's request for an LRN and an NXX code, in the Union Star, Missouri rate center are granted. Windstream shall utilize one block of one thousand numbers from the code and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,

**/s/ Whitney Payne**

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 31st day of January, 2018, to all counsel of record.

**/s/ Whitney Payne**