

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

In the Matter of the Application of Teleport)
Communications America, LLC for Review)
And Reversal of North American Number)
Plan Thousands-Block Pooling Administrator’s)
Decision to Withhold Numbering Resources) **File No. LO-2023-0384**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff),
by and through counsel, and for its Recommendation in this matter states as follows:

1. On May 8, 2023, Teleport Communications of America, LLC, an affiliate of AT&T Corp. (hereafter “Teleport” or “the Company”) filed an application with the Missouri Public Service Commission (the “Commission”) under 47 CFR 52.15(g)(3)(iv), 20 CSR 4240-2.060. and 20 CSR 4240-28.016(1) requesting the Commission review and reverse a decision of the North American Numbering Plan Administrator (NANPA)’s denial of 1,000 consecutive numbers. Teleport requested the numbers to meet BJC HealthCare’s (hereafter “BJC”) expanding telecommunications needs in the Harvester, Missouri Rate Center for Number Plan Areas (NPA) 636.

2. Commission Rule 20 CSR 4240-28.016 governs the specific telephone numbering requirements that each applicant must meet when requesting the Commission overturn a decision of the NANPA or the Thousands-Block Pooling Administrator to deny a carrier’s request for additional numbering resources. Applications must also comply with 4 CSR 4240-2.060 and shall be verified by oath as to the truthfulness contained in the application by an officer or director of the applicant.

3. The Staff recommends the Commission’s Order include statements substantially similar to the following:

Grant Teleport's request for 1,000 consecutive numbers within the 636 NPA, the Harvester rate center, with a preferred assigned block in 636-263-XXXX. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.

4. Staff has provided a memorandum attached to this pleading as Appendix A. Staff's memorandum outlines the reasons why Staff believes Teleport has met the requirements of 20 CSR 4240-28.016, and that the Commission should approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for BJC.

WHEREFORE, Staff recommends that the Commission issue an order that approves Teleport Communications of America, LLC's, application requesting the Commission review and reverse a decision of the NANPA denial of 1,000 consecutive numbers requested to meet BJC's expanding telecommunications needs in the Harvester, Missouri Rate Center; and grant such other and further relief as is just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

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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 7th day of June, 2023, to all counsel of record.

/s/ Carolyn H. Kerr

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. LO-2023-0384

From: Kari Salsman, Senior Research/Data Analyst
John VanEschen, Regulatory Compliance Manager
Telecommunications Department

Subject: Staff's Recommendation to Approve Teleport Communications America, LLC's Request for Additional Numbering Resources to accommodate the needs of BJC HealthCare in the Harvester rate center.

Date: June 7, 2023

On May 8th, Teleport Communications America, LLC (hereafter, "Teleport") filed a request for the Missouri Public Service Commission (hereafter, "Commission") to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of Teleport for additional telephone numbering resources in the Harvester rate center. According to Teleport, BJC HealthCare (BJC) is growing and is in need of 1,000 consecutive numbers within the 636 Numbering Plan Area (NPA), in the Harvester rate center, with a preferred assigned block in 636-263-XXXX.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Harvester rate center to meet the needs of BJC and requests the Commission to override the NANPA's denial of Teleport's request for the additional telephone numbers. Denial was based on Teleport's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Teleport may very well have available telephone numbers to assign BJC; however, said numbers are not in sequential order, which is necessary to work with BJC's communications plan.

In support of its Application, Teleport provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Teleport provided Staff confidential copies of its telephone number utilization for the Harvester rate center. The Staff has examined the request and supporting documentation, and in the Staff's opinion, Teleport's application complies with the requirements of 20 CSR 4240-28.016, and Teleport has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 636 area code is beyond 30 years. Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for BJC.

Specifically, the Staff recommends the Commission's order include statements substantially similar to the following:

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Grant Teleport's request for 1,000 consecutive numbers within the 636 NPA, the Harvester rate center, with a preferred assigned block in 636-263-XXXX. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.