

**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 )  
Number Plan Thousands-Block Pooling )  
Administrator's Decision to Withhold Numbering )  
Resources )

**File No. IO-2014-0146**

**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 November 14, 2013, 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 Chillicothe, Missouri rate center. More specifically, the requested resources consist of one thousands-block from which two sets of consecutive numbers totaling 600 numbers may be drawn that are within (1) the 660 NPA, (2) the Chillicothe rate center, (3) the 214 NXX and (4) the XXXX ranging from 8100 through 8499 and 8600 through 8799 to meet the needs of St. Luke's Hedrick Medical Center.

2. AT&T Missouri states that it does not have the numbers available for assignment in the Chillicothe rate center to meet the needs of St. Luke's. 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 St. Luke's; however, said numbers do not meet the required criteria.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Chillicothe 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 St. Luke's.

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

(1) Determines AT&T 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 AT&T Missouri's request for telephone numbers in the Chillicothe rate center, and

(3) Contains the following language:

AT&T Missouri's request for 600 numbers within the 660 NPA, 214 NXX, and 8100-8499 and 8600-8799 XXXX in the Chillicothe, Missouri rate center (i.e., (660)214-8100 – (660)214-8499, and (660)214-8600 – (660)214-8799) is granted.

Respectfully submitted,



Colleen M. Dale  
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Attorney for the Staff of the  
Missouri Public Service Commission  
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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 20<sup>th</sup> day of November, 2013.

A handwritten signature in black ink, appearing to be "Allan" followed by a stylized surname.

# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. IO-2014-0146

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

**Subject:** Staff's Recommendation to Southwestern Bell Telephone Company d/b/a AT&T Missouri Request for Additional Numbering Resources to accommodate the needs of Saint Luke's Hedrick Medical Center in the Chillicothe rate center.

**Date:** November 19<sup>th</sup>, 2013

On November 14<sup>th</sup>, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny the request of AT&T Missouri for additional telephone numbering resources in the Chillicothe, Missouri telephone rate center (Application). According to AT&T Missouri, Saint Luke's Hedrick Medical Center (St. Luke's) is moving its facility, which is part of its overall telecommunications network, that utilizes numbers among various locations across the Kansas City metropolitan area. To accommodate its needs, St. Luke's is in need of 600 consecutive numbers for the relocation. Specifically, the requested resources consist of 600 numbers within (1) the 660 NPA, (2) the Chillicothe rate center, (3) the 214 NXX, and (4) XXXXs beginning with 8 and ranging from 8100 through 8499 and from 8600 through 8799.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Chillicothe rate center to meet the needs of St. Luke's and requests the Commission to override the NANPA's denial of AT&T Missouri's request for the additional telephone numbers, which denial was based on AT&T Missouri'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 St Luke's; however, said numbers are not in sequential order.

In support of its Application, AT&T Missouri provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, AT&T Missouri provided Staff highly confidential copies of its telephone number utilization for the Chillicothe rate center. The Staff has examined the request of AT&T Missouri and supporting documentation.

The Staff has examined AT&T Missouri's request and 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 St. Luke's.

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

AT&T Missouri's request for 600 consecutive numbers within the 600 NPA, the 214 NXX, with XXXX's beginning with 8 and ranging from 8100 through 8499 and from 8600 through 8799 (i.e., 660 214-8100 through 660 214-8499, and 660 214-8600 through 660 214-8799), in the Chillicothe, Missouri rate center is granted.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined AT&T Missouri's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

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

A handwritten signature in cursive script that reads "Kari Salsman".

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KARI SALSMAN