

**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	)	<b><u>File No. IO-2012-0172</u></b>
Number Plan Thousands-Block 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 December 1, 2011, 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 Lee's Summit, Missouri rate center. More specifically, the requested resources consist of one 1000-block of Direct Inward Dial telephone numbers. More specifically, the requested resources consist of one thousands-blocks within (1) the 816 NPA, (2) the XXXXs whose ranges of either 2000-2999 or 7000-7999 and (3) the Lee's Summit rate center. one thousands-blocks from which 300 consecutive numbers may be drawn that are within (1) the 816 NPA, (2) an NXX comprised of XX7, (3) an XXXX range from 6000 through 8999, and (4) the Lee's Summit rate center to meet the needs of the Government Employees Health Association, Inc.

2. AT&T Missouri states that it does not have the numbers available for assignment in the Lee's Summit rate center to meet the needs of the Government Employees Health Association, Inc. 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 the Government Employees Health Association, Inc.; however, said numbers are not in sequential order.

3. AT&T Missouri provided the Staff with its telephone number utilization for the Lee's Summit 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 the Government Employees Health Association, Inc.

**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 Lee's Summit rate center, and

(3) Contains the following language:

AT&T Missouri's request for one thousands-blocks within the 816 NPA, XXXXs ranges of either 2000-2999 or 7000-7999, in the Lee's Summit, Missouri rate center is granted.

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 9<sup>th</sup> day of December, 2011.



# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. IO-2012-0172

**From:** Kari Salsman  
Telecommunications Unit

William Voight          12-7-11  
Tariff, Safety, Economic and Engineering Analysis

**Subject:** Staff's Recommendation to Approve AT&T Missouri's Request for Additional Numbering Resources to accommodate the needs of Government Employees Health Association, Inc. in the Lee's Summit rate center.

**Date:** December 7<sup>th</sup>, 2011

On December 1<sup>st</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 AT&T Missouri's request for additional telephone numbering resources in the Lee's Summit, Missouri telephone rate center (Application). According to AT&T Missouri, Government Employees Health Association, Inc. ("GEHA"), is in the process of expanding its present location, as well as its recent acquisition of adjacent property in Lee's Summit. To accommodate its needs, GEHA is in need of one 1000-block of Direct Inward Dial telephone numbers. More specifically, the requested resources consist of one thousands-blocks within (1) the 816 NPA, (2) the XXXXs whose ranges of either 2000-2999 or 7000-7999 and (3) the Lee's Summit rate center.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Lee's Summit rate center to meet the needs of GEHA. AT&T Missouri 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 to GEHA; 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 Ladue rate center. The Staff has examined AT&T Missouri's request and supporting documentation.

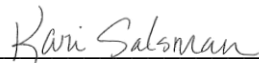
The Staff has examined AT&T Missouri's request and in the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for GEHA.

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

AT&T Missouri's request for one thousands-blocks within the 816 NPA, XXXXs ranges of either 2000-2999 or 7000-7999, in the Lee's Summit, 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.



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KARI SALSMAN