

**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)	<u>File No. IO-2015-0259</u>
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 April 10, 2015, 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 Trenton, Missouri rate center. More specifically, the requested resources consist of one thousands-block from which 100 consecutive numbers may be drawn that are within (1) the 816 NPA, (2) the Trenton rate center, (3) an XXXX range of 4000-6999, to meet the needs of St. Luke's Health System in expanding voice services at Wright Memorial Hospital in Trenton.

2. AT&T Missouri states that it does not have the numbers available for assignment in the Trenton 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 Trenton 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 Trenton rate center, and

(3) Contains the following language:

AT&T Missouri's request for 100 consecutive numbers within the 816 NPA, with an XXXX range of 4000-6999, in the Trenton, Missouri rate center is granted.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

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 17th day of April, 2015.

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

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2015-0259

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 Health System in the Trenton rate center.

Date: April 15, 2015

On April 10th, 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 Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of AT&T Missouri for additional telephone numbering resources in the Trenton, Missouri telephone rate center (Application). According to AT&T Missouri, Saint Luke's Health System (St. Luke's) is expanding its voice network at its Wright Memorial Hospital in Trenton. With this expansion, St. Luke's is in need of additional numbering resources that would be consistent with St. Luke's larger voice network serving its entire health system across the greater Kansas City metropolitan area. To accommodate its needs, St. Luke's is in need of 100 consecutive numbers within the XXXX range of 4000-6999.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the Trenton 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 Trenton 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, ATAT's application complies with the requirements of 4CSR240-37.040. 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:

Grant AT&T Missouri's request for 100 consecutive numbers within the 816 NPA, with an XXXX range of 4000-6999, in the Trenton, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyLink's original request.

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".

KARI SALSMAN