

**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-2019-0090

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 September 27, 2018, 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 to support the expanding telecommunications needs of American Dehydrated Foods, Inc. ("ADF") in Monett, Missouri. ADF is expanding its voice network to serve its operations in Monett and is in need of additional numbering resources that would be consistent with ADF's larger voice network serving its operations across Monett. To accommodate its needs, ADF is in need of 100 consecutive numbers within the 417-XXX-XXXX range of 1000-4000 or 6000-8000. AT&T has no numbering resources meeting the criteria and therefore, requests a one-thousands block from which these 100 numbers can be drawn.

2. AT&T states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied its request for the additional telephone

numbers based on AT&T's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined AT&T's request and supporting documentation. In Staff's opinion, AT&T has demonstrated a verifiable need for the additional telephone numbers and complied with 4 CSR 240-37.040. Staff recommends the Commission approve AT&T'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 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 designated area; and

(3) Contains the following language:

Grant AT&T Missouri's request for 100 consecutive numbers within the 417 NPA, with a XXX-XXXX range of 1000-4000 or 6000-8000, in the Monett, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying AT&T Missouri's original request.

Respectfully submitted,

/s/ Ron Irving

Ron Irving

Legal Counsel

Missouri Bar No. 56147

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8702 (Telephone)

(573) 751-9285 (Fax)

ron.irving@psc.mo.gov

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 15th day of October, 2018, to all counsel of record.

/s/Ron Irving