

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Application of CenturyTel of)
Missouri, LLC d/b/a CenturyLink, For Review and)
Reversal of North American Number Plan) Case No. _____
Thousands-Block Pooling Administrator's Decision)
to Withhold Numbering Resources.)

CENTURYTEL OF MISSOURI, LLC d/b/a CENTURYLINK
APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW CenturyTel of Missouri, LLC d/b/a CenturyLink (CenturyLink) and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, Telcordia Technologies, Inc. dba as iconectiv. (NANPA), to withhold certain numbering resources from CenturyLink. CenturyLink files this verified Application and Motion for Expedited Treatment pursuant to 20 CSR 4240-2.060, 20 CSR 4240-2.080(14), 20 CSR 4240-28.016 and 47 CFR 52.15(g)(3)(iv). The requested numbering resources are necessary to meet the needs of National Information Solutions Cooperative in Lake St. Louis, Missouri when it expands its existing service location. The resources requested consist of 600 consecutive direct-inward-dial (DID) telephone numbers in the 636 area code.

In support of this Application, CenturyLink states as follows:

1. CenturyLink is a Louisiana limited liability corporation that is duly authorized to do business in the State of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of CenturyLink's Certificate of Authority to transact business in Missouri from the

Missouri Secretary of State were filed in Case No. TM-2002-232,¹ and are incorporated herein by reference pursuant to 20 CSR 4240-2.060(1)(G).

2. All correspondence, pleadings, orders, decisions, and communications regarding this matter should be sent to:

Brook Villa
301 Main Street, Suite 1200
Baton Rouge, LA 70801
Phone: 225-333-3021
brook.villa@centurylink.com

Becky Owenson Kilpatrick
100 CenturyLink Drive
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3. There are no pending actions or final unsatisfied judgments or decisions against CenturyLink from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.

4. National Information Solutions Cooperative (NISC) is expanding its presence in Lake St. Louis, Missouri due to growth in the business. NISC projects a need of an additional 600 new DID numbers for its Lake St. Louis location. NISC has specifically requested a block of 600 consecutive DID numbers for this growth. Adding sequential numbering will be more efficient, easier to use and will provide easier assignment for emergency response location.²

¹ *In the Matter of the Joint Application of GTE Midwest Incorporated, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri: 2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) to Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) to Designate CenturyTel of Missouri, LLC, as a Telecommunications Carrier Eligible to Receive Federal Universal Support*, Case No. TM-2002-232.

² A copy of the Customer Request to CenturyLink is attached hereto and marked as Exhibit A.

5. CenturyLink has researched the available thousand-blocks in its Dardenne rate center (DRDNMOXARS1) which serves this customer and found that it has no thousands-blocks available for use from which to draw the requested sequential numbering resources that would meet NISC's needs.³ As a result of this research, CenturyLink requests that the Commission grant it numbering resources with the NPA-NXX of 636-3xx, beginning with 3 as requested.

6. On April 2, 2020 CenturyLink submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet NISC's needs.⁴ CenturyLink completed the Thousands-Block Application Form in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet.⁵

7. On or about April 2, 2020, NANPA denied the requests on the grounds that CenturyLink had not met the utilization criteria.⁶

8. CenturyLink seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases where customers have required a large amount of sequential numbers and it should likewise do so here.

9. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the

³ Seven potential thousand-blocks are available in the Dardenne rate center. Of those seven blocks, six are designated for the metropolitan calling area ("MCA") plan. The remaining block, which is non-MCA, begins with a '1' and is likewise unavailable as NISC's direct inward dialing system will not function with blocks that begin with a '0', '1', or '9'.

⁴ A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

⁵ A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

⁶ A copy of this decision is attached hereto and marked as Exhibit D.

FCC's March 31, 2000 *Order* in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources.⁷ Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁸ Moreover, the FCC determined that states may overturn NANPA's decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request.⁹

10. The FCC further explained in its March 31, 2000 *Order* that a "[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers."¹⁰ Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated "in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests."¹¹

11. Further, this Application complies with 20 CSR 4240-28.016. CenturyLink has attached hereto its "Months to Exhaust Worksheet" indicating the utilization for the Dardenne rate center encompassing the preceding six months and

⁷ 15 FCC Rcd. 7574, *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rule Making, CC Docket No. 99-200 (rel. Mar. 31, 2000), Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

⁸ *Id.*

⁹ *In the Matter of Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration, CC Docket No. 99-200, et al., (rel. Dec. 28, 2001), para. 64; *see also*, 47 CFR 52.15(g)(4).

¹⁰ *Id.*

¹¹ *Id.*, at para. 66.

projected monthly utilization for the next twelve months.¹² CenturyLink has also attached its most recently filed FCC Form U1 of Form 502 for the Dardenne rate center.¹³ Finally, CenturyLink attaches copies of its originally-filed requests to NANPA and NANPA's denial of those requests.¹⁴ These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyLink has exhausted all other available remedies designed to conserve numbering resources.

12. CenturyLink seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. In order to accommodate NISC's needs, the Commission must issue its order as soon as possible so that CenturyLink will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyLink described herein, both to meet NISC's needs but also so that CenturyLink and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely basis. CenturyLink filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

WHEREFORE, CenturyLink respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources

¹² See Exhibit C.

¹³ The portions of FCC Form U1 of Form 502 pertaining to the Dardenne rate center are attached hereto and marked as Exhibit E (Confidential) as it contains exchange specific customer numbers. Please note that this file is a copy of the electronic submission that is now required by the Administrator and no longer carries the headings of the paper form that was formerly utilized by the Administrator.

¹⁴ See Exhibits B and D.

described herein to meet the telecommunications needs of NISC in Lake St. Louis, Missouri.

Respectfully Submitted,

/s/ Becky Owenson Kilpatrick

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Phone: 318.340.5027

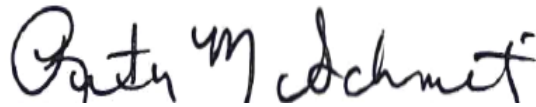
Becky.kilpatrick@centurylink.com

*Attorney for CenturyTel of Missouri, LLC
d/b/a CenturyLink*

VERIFICATION

I, Rita M. Schmitz, of lawful age, and being first duly sworn, now state: I am an Analyst II for CenturyLink, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Rita M Schmitz". The signature is written in a cursive, flowing style.

Rita M. Schmitz

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of April, 2020, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

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