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)	Case No.	
Number Plan Thousands-Block Pooling)		
Administrator's Decision to Withhold Numbering)		
Resources)		

AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW AT&T Missouri¹ 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, NeuStar, Inc. ("NANPA"), to withhold certain numbering resources from AT&T Missouri.

The requested numbering resources are necessary to meet the needs of Hannibal-LaGrange College ("Hannibal-LaGrange"), located in Hannibal, Missouri. The resources consist of a single thousands-block within the NPA-NXX of 573-629, in the Hannibal rate center, and within the XXXX range of 3000-3999 (i.e., 573-629-3000 through 573-629-3999) from which three hundred (300) sequential telephone numbers can be drawn to meet Hannibal-LaGrange's needs. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet Hannibal-LaGrange's needs.

 $^{^1}$ Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri"). AT&T Missouri files this verified Application and motion for expedited treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv).

In support of this Application, AT&T Missouri states as follows:

- 1. AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. AT&T Missouri is authorized to do business in Missouri² and its fictitious name is duly registered with the Missouri Secretary of State.³ AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo. 2000.⁴
- 2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Timothy P. Leahy
Leo J. Bub
Robert J. Gryzmala
Attorneys for Southwestern Bell Telephone Company
d/b/a AT&T Missouri
One AT&T Center, Room 3516
St. Louis, Missouri 63101

3. Hannibal-LaGrange is a four-year liberal arts college which was founded in 1858 and is located at 2800 Palmyra Road in Hannibal, Missouri. Hannibal-LaGrange is in the process of expanding its facilities to accommodate increased student enrollment and, in

² In accordance with 4 CSR 240-2.060(1) and (G), a certified copy of Southwestern Bell Telephone Company's Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044..

³ In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

⁴ Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company, d/b/a AT&T Missouri. See, Order Granting Expedited Treatment and Approving Tariffs, Case No. TO-2002-185, issued June 29, 2007.

connection with that expansion, is upgrading its telecommunications system and facilities to accommodate its growing needs.

- 4. Hannibal-LaGrange has requested numbering resources consisting of three hundred (300) sequential telephone numbers. Mr. Brock Lodde, of Simply Office Solutions, has been coordinating Hannibal-LaGrange's telecommunications-related needs with the college's personnel. A copy of Mr. Lodde's November 15, 2007, letter to AT&T Missouri is attached hereto and marked as Exhibit A1. As noted in the letter, Hannibal-LaGrange needs "three hundred consecutive Direct Inward Dial numbers to accommodate the upgrading of its new telecommunications system and facilities necessitated by its expansion." As Mr. Lodde further explains, the XXXX range of consecutive numbers needed by Hannibal-LaGrange "cannot start with '9' or '0' because the ShoreTel telephone system that is being installed will not accept those numbers."
- 5. AT&T Missouri has no available thousands-blocks available for use from which to draw the numbering resources that would meet Hannibal-LaGrange's needs. It has researched the available blocks in its Hannibal rate center (HNBLMOACDSA) which serves Hannibal-LaGrange's location.
- 6. As a result of this research, AT&T Missouri requests that the Commission grant it numbering resources consisting of the NPA-NXX of 573-629, and the XXXX range of 3000-3999 (i.e., 573-629-3000 through 573-629-3999). AT&T Missouri has determined that the numbering resources requested herein would be compatible with Hannibal-LaGrange's telecommunications service requirements. In the event that the requested numbering resources

needs.

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⁵ Although the number resources requested in an earlier letter by Mr. Oran Woodworth, Hannibal-LaGrange's Accounting and Purchasing Agent, to AT&T Missouri (attached hereto and marked as Exhibit A2), are not available, Hannibal-LaGrange has since indicated that the numbering resources requested herein would meet its

are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet Hannibal-LaGrange's needs.

- 7. On October 30, 2007, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Hannibal-LaGrange's needs. A copy of the Application is attached hereto and is marked as Exhibit B. AT&T Missouri completed the Application 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, a copy of which is attached hereto and marked as Exhibit C.
- 8. On or about October 30, 2007, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization criteria. A copy of that decision is attached hereto and marked as Exhibit D.
- 9. AT&T Missouri 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 and it should likewise do so here.
- 10. 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 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. Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold

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⁶ Report and Order and Further Notice of Proposed Rule Making, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; see also, 47 CFR 52.15(g)(3)(iv).

numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein." 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:

We also agree with WinStar that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.⁸

11. 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." 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." ¹⁰

12. Further, this Application complies with 4 CSR 240-37.040. AT&T Missouri has attached hereto its "Months-to-Exhaust Worksheet" indicating the utilization for the Hannibal rate center encompassing the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-37.040(1)(A)1. *See*, Exhibit C. AT&T Missouri has also attached hereto its most recently-filed FCC Form U1 of Form 502 for the Hannibal rate center. 4 CSR 240-37.040(1)(A)2. *See*, Exhibit E. Finally, AT&T Missouri attaches copies of its originally-

Id.

⁸ Third Report and Order and Second Order on Reconsideration, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, et al., December 12, 2001, paragraph 64; *see also*, 47 CFR 52.15(g)(4).

¹⁰ *Id.* at paragraph 66.

filed request to NANPA (i.e., its Thousands-Block Application Form, Part 1a) and NANPA's denial of that request. 4 CSR 240-37.040(1)(A)3. *See*, Exhibits B and D. These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, AT&T Missouri has exhausted all other available remedies designed to conserve numbering resources. 4 CSR 240-37.040(1)(A)4.

- 13. AT&T Missouri does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.
- 14. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.
- 15. AT&T Missouri 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. Hannibal-LaGrange "need[s] to program the 300 new DID's within the next week, if at all possible to make the install date before the end of November." Exhibit A1. In order to accommodate Hannibal-LaGrange's needs, the Commission must issue its order as soon as possible, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of the numbering resources to AT&T Missouri described herein, both to meet Hannibal-LaGrange's needs and so that AT&T Missouri and any other telecommunications service providers that provides service via a switch can program their switches. AT&T Missouri filed this request for expedited treatment as soon as it could have. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri's request for numbering resources and AT&T Missouri determined that it was not feasible to implement a technological alternative.

WHEREFORE, AT&T Missouri 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 described herein to meet the telecommunications needs of Hannibal-LaGrange College and, in the event that the requested resources are then unavailable, to release such other suitable blocks as will meet Hannibal-LaGrange College's needs.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPNY

TIMOTHY P. LEAHY

#36197 LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for Southwestern Bell Telephone Company

d/b/a AT&T Missouri

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robert.gryzmala@att.com (E-Mail)

COUNTY OF COLE)	
)	SS
STATE OF MISSOURI)	

VERIFICATION

I, Alan G. Kern, first being duly sworn, state on my oath that I am over the age of twenty-one years, sound of mind, and Director-Regulatory of Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri"). I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read the foregoing document and I am informed and believe that the matters contained therein are true.

Alan G. Kern

On this 15th day of November 2007, before me, a Notary Public, personally appeared Alan G. Kern, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and Director-Regulatory of AT&T Missouri, he signed the foregoing document as Director-Regulatory of AT&T Missouri and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.

TOTADA STANDARD

My Commission Expires: January 5, 2008

MARYANN PURCELL
Notary Public - Notary Seal
STATE OF MISSOURI

City of St. Louis
My Commission Expires: Jan. 5, 2008

CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by email on November 15, 2007.

Robert J. Lygmala

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
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11/15/2007

To AT&T Missouri,

Hannibal-LAGrange College needs three hundred consecutive Direct Inward Dial numbers to accommodate the upgrading of its new telecommunications system and facilities necessitated by its expansion. These DID's are going to be used for the employees for the college and cannot start with '9' or '0' because the ShoreTel telephone system that is being installed will not accept those numbers. They need to program the 300 new DID's within the next week, if at all possible to make the install date before the end of November. Please request the 300 DID's ASAP.

Thank you,

Brock Lodde Simply Office Solutions DBA - WorldNet Solutions AT&T Agent



To Whom It May Concern,

We need to have 300 DID's in a specific range. We can not have numbers that start with 0 or 9 because our phone system can not handle that range. Could you please supply us with 300 DID's in the following range.

573 406-6500-6800

If these ranges do not work could you give us 300 consecutive numbers between the range of 1000-8999.

Oran Woodworth

Accountant and Purchasing Agent

573-221-3675 ext 262

TBPAG Attachment 1 - March 19, 2007 ATIS-0300066.at1

Part 1A								
Type of Application (check one): X New □ Change ⁱ □ Disconnect								
GENERAL APPLICATION INFORMATION								
1.1 Contact Information: Block Applicant: Company Name: _AT&T-SOUTHWEST_ Headquarters Address: _2600 CAMINO RAMON								
1.2 General Information								
Check one: No LRN neededXLRN needediii								
NPA: _573 LATA: _520OCN ^{iv} : _9533 Parent Company's OCN_9533 Number of Thousands-Blocks Requested:1 Switch Identification (Switching Entity/POI) ^v : _HNBLMOACDSACity or Wire Center Name								
Rate Center Vi:HANNIBALRate Center Sub Zone:								
1.3 Dates								
Date of Application VIII:10/30/2007 Requested Block Effective Date VIII:45 DAY Request Expedited Treatment? (See Section 8.6) YesX No								
1.4 Type of Service Provider Requesting the Thousands-Block:								
a) Type of Service Provider:								
1.5 Type of Request								
Initial block for rate center: Yes, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days								
Growth block for rate center: Yes_XXX_, If Yes, attach months to exhaust worksheet								

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

ı	Part 1A	on Form
Change block: Yes, If Yes, in	ndicate NPA-NXX-X, type of and reas	son for change:
Disconnect block: Yes, If Ye	es, list NPA-NXX-X	
Remarks:DEDICATED CUST	OMER	
•	1 0	s true and accurate to the best of my knowledge and -Block (NXX-X) Pooling Administration Guidelines
SIGNATURE ON FILE Signature of Block Applicant	CODE ADMINISTRATORTitle	

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Instructions for filling out each Section of the Part 1A form:

- Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.
- Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^{ix}. Explanations of these terms may be found in the footnotes.
- Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.
- Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.
- Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: ____ TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.5.

The Pool Administrator is available to assist in completing these forms.

iii A CO Code application will also need to be submitted to the PA

Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

vi Rate Center name must be a tariffed Rate Center.

vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)

Dat	te: 10/30/2007	00	:N: <u>9533</u>	Co	ompany Nan	ne: <u>AT</u>	T&T-SOU	THWEST						
Rat	te Center: HANN	<u>IBAL</u>		_										
List	t all Codes NPA(s)-N	KXs: 573-221,	, 573-231, 5	73-248,	573-406, 57	3-629								
anc	d Blocks NPA(s)-NXX	-X(s): <u>573-23</u>	1-0, 1, 3, <u>5</u> 7	73-248-0,	1, 2, 3, 5, 8	, 9, 573-	<u>-406-0, 1, </u>	5, 6, 573-	<u>629-0</u>					
Naı	me of Block Applicant	: CONNIEM	MCNAUGH	TON/NA	TALIE WHIT	TINGTO	ON	Signature	e: SIG	NATURE	ON FILE			
Title	e: CODE ADMINIS	TRATOR	Telephone	No.: <u>(9</u>	25) 824-562°	7 FA	X No.:	<u>(925) 355</u>	-9268	_E-Mail:_	cm3123	@ATT.CC	<u>MC</u>	
A.	Available Numbers:	5438	_											
В.	Assigned Numbers:	17940												
C.	Total Numbering Res	sources: 25	000											
D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:0														
			Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E.	Growth History – months ²	Previous 6	<u>-52</u>	53	<u>-154</u> .	53_	<u>-52</u>	<u>166</u>						
F.	Forecast – Next 12 m	onths ³	0	<u>1024</u>		<u>)</u>	0	0	<u>0</u>	0	0	0	0	0
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):														
Н.	Months to Exhaust ⁴	ļ		Numbe	ers Available for Average M			mers (A)		=	31.863			
l.	Utilization ⁵				Numbers (B) – E g Resources (C				* 100	=	<u>71.760</u>	%		

Explanation: - FORECAST Actual Value M1 (- 675) Actual Value M3 (- 37) Actual Value M4 (- 21) Actual Value M5 (- 18) Actual Value M6 (-28) Actual Value M7 (- 21) Actual Value M8 (- 63) Actual Value M9 (- 79) Actual Value M10 (- 43) Actual Value M11 (-56) Actual Value M12 (-35) DEDICATED CUSTOMER - 1 BLOCK REQUEST - LAGRANGE

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

² Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

⁵ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

573-HANNIBAL-MO

LAGRANGE COLLEGE

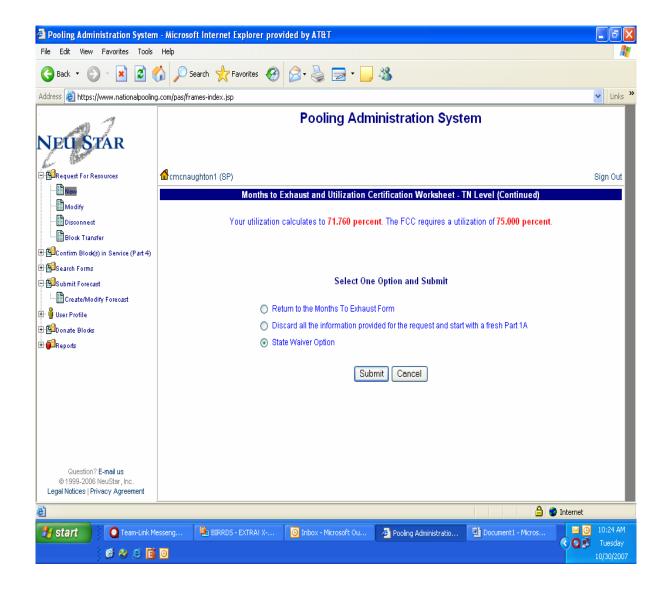


EXHIBIT E

IS

HIGHLY CONFIDENTIAL

IN ITS ENTIRETY