

**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 |) | File No. IO-2009-0451 |
| Number Plan Thousands-Block Pooling |) | |
| Administrator's Decision to Withhold Numbering |) | |
| Resources |) | |

**AT&T MISSOURI'S SUPPLEMENTAL RESPONSE TO STAFF'S
RECOMMENDATION**

COMES NOW AT&T Missouri,¹ and in accordance with the Commission's July 22 Order Granting Additional Time for Responses, files its Supplemental Response to the Staff's Recommendation of July 13. For the reasons shown below, AT&T Missouri has fully addressed Staff's remaining questions concerning AT&T Missouri's Application and urges that the Application be granted at the earliest practicable opportunity.

On June 30, AT&T Missouri filed its Application requesting specific numbering resources on behalf of HealthLink, Inc. ("HealthLink"), due to its impending plans to relocate within the St. Louis area. HealthLink is a member of the WellPoint family of companies and a valued customer of AT&T Missouri. In its Application, AT&T Missouri stated that the contents of the Application, including its associated Exhibits A through E, demonstrated a verifiable need for the numbering resources AT&T Missouri requested.

As is not unusual in such applications, Staff's review of the Application and exhibits lead to inquiries whether certain blocks of numbers within AT&T Missouri's own inventory of numbers might meet HealthLink's needs. AT&T Missouri appreciates that if its own inventory could meet HealthLink's needs, there would be no need for the filing of the Application. AT&T Missouri promptly sought to address each of Staff's inquiries. Nevertheless, Appendix A of

¹ Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

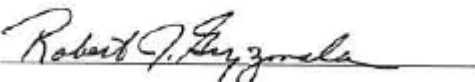
Staff's Recommendation (filed July 13) indicated the view that "AT&T [Missouri] has blocks of one thousand telephone numbers in its inventory to meet HealthLink's request" and that Staff "has requested to know why these available telephone numbers will not satisfy HealthLink's request, but AT&T [Missouri] has not provided a response to Staff's questions."

Attached hereto is the pertinent e-mail correspondence between Staff and AT&T Missouri (from July 1 through July 22), in which AT&T Missouri has addressed Staff's inquiries.² By this correspondence, AT&T Missouri further demonstrates that telephone numbers in its present inventory will not meet HealthLink's needs. To AT&T Missouri's knowledge, no Staff inquiries remain outstanding. AT&T Missouri appreciates Staff's having studiously reviewed and considered its responses.

WHEREFORE, AT&T Missouri respectfully files this Supplemental Response and renews its request that its Application be granted.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

TIMOTHY P. LEAHY #36197

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for Southwestern Bell Telephone Company

d/b/a AT&T Missouri

One AT&T Center, Room 3516

St. Louis, Missouri 63101

314-235-6060 (tn)/314-247-0014 (fax)

robert.gryzmala@att.com

² The e-mail messages attached hereto are the material correspondence (though not all) exchanged. For purposes of brevity and ease of reading, "string" e-mail messages contained within these messages have been deleted.

CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on July 23, 2009.


Robert J. Grymalala

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Public Counsel
Michael F. Dandino
Office Of The Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov
mike.dandino@ded.mo.gov

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Wednesday, July 01, 2009 4:38 PM
To: 'Buyak, Sara*'
Subject: IO-2009-0451

Sara,
HealthLink cannot use certain blocks e.g., 3XXX, 4XXX and 7XXX, because they are already using numbers in those blocks for internal station to station calling. They programmed numbers for internal use into their equipment. These are not numbers that they got from us and they are not used by outsiders to call into the company. Since they will use the DID numbers they get from us as internal station numbers also they can't have DID numbers that are in the same blocks as their internal numbers because there would be duplicate numbers. This is what they mean when they say that their current dialing plan prohibits the use of certain blocks. Thanks
Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Thursday, July 02, 2009 8:48 AM
To: 'Buyak, Sara*'
Subject: RE: IO-2009-0451

Sara,

In response to your question concerning how many numbers in 314-989-6700-6999 are in use - all of those numbers are assigned to other customers. Thanks

Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Thursday, July 02, 2009 10:28 AM
To: 'Buyak, Sara''
Subject: RE: IO-2009-0451

Sara,
Concerning your question about 314-465 and Bank of America, Bank of America has the entire NXX. Thanks
Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Thursday, July 02, 2009 10:52 AM
To: 'Buyak, Sara'
Subject: RE: IO-2009-0451

I'm still checking on the technical issues with porting out of a 1A, but the answer to "why does it need to port if it is in St. Louis" is that 314-762 is in a different switch in St. Louis than the switch that will serve HealthLink in its new location. To move 314-762 to a different switch would be porting.

To understand internal numbering think about HealthLink employees who have a telephone on their desk but do not have a DID number. They have to have an internal station number assigned to their phone so other employees can call them. Those station numbers are 4 digits. Now think about the employees that have DID numbers so they can be called by the outside world. Those employees use the last 4 digits of the DID number for their station number. So if HealthLink assigned internal station numbers in the 4XXX range (which they did), they can't also use DID numbers in the 4XXX range because more than one employee would have the same number.

Alan Kern
 State Legislative & Reg Affairs
 AT&T Services, Inc
 314-331-1610
alan.kern@att.com

From: Buyak, Sara* [mailto:s.buyak@psc.mo.gov]
Sent: Thursday, July 02, 2009 10:30 AM
To: KERN, ALAN G (ATTSI)
Subject: RE: IO-2009-0451

Hi Alan,

I'm still unsure about a few items. You said the (314)762 is an old 1 A switch and cannot port. Why does it need to port if it is in St. Louis where HealthLink is moving? Why isn't this switch portable?

The explanation you gave me on why the company cannot use the 3, 4, or 7 block does not make sense. (They programmed numbers for internal use into their equipment. These are not numbers that they got from us and they are not used by outsiders to call into the company.) Why is the company using another numbering system? How does that work with the current numbers you are going to assign to HealthLink? If the (314)762 blocks cannot be ported, are you going to return the blocks to the pool?

Can we have a conference call on Monday to discuss?

Thank You,
 Sara

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Thursday, July 09, 2009 11:19 AM
To: 'Buyak, Sara*'
Subject: RE: IO-2009-0451

Sara,

As we discussed earlier, because of technical limitations of the 1A switch there are restrictions on moving numbers into and out of it. One of the limitations is a limit on the number of thousands blocks and NPA-NXX combinations that can be loaded into the switch. As you know the available thousands block in the St. Louis rate center that would satisfy the needs of HealthLink is, unfortunately, in a 1A switch.

We do port numbers out of a 1A to CLECs when they win one of our customers and move them to the CLEC switch. However we do not port numbers into the 1A switch unless the NPA-NXX combination of the number already exists in the switch. I have asked our network folks about the feasibility of porting a thousands block out of a 1A to another one of our switches, but I have not received a determination on that at this time.

If you have any questions please call me. Thanks
Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Friday, July 10, 2009 11:07 AM
To: 'Buyak, Sara'
Subject: RE: IO-2009-0451

Sara,

I received confirmation that we do not port thousands blocks out of our 1As to other switches. This policy is due to the capacity limitations discussed in the email below and in our earlier discussions. If we begin moving thousands of numbers from a 1A and that triggers a need to replenish the 1A with additional numbers, we could be prevented from doing so because of the limit on the number of blocks and NPA-NXX combinations that can be loaded into the 1A switch.

If you have any questions please call me. Thanks

Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

From: KERN, ALAN G (ATTSI)
Sent: Thursday, July 09, 2009 11:19 AM
To: 'Buyak, Sara*'
Subject: RE: IO-2009-0451

Sara,

As we discussed earlier, because of technical limitations of the 1A switch there are restrictions on moving numbers into and out of it. One of the limitations is a limit on the number of thousands blocks and NPA-NXX combinations that can be loaded into the switch. As you know the available thousands block in the St. Louis rate center that would satisfy the needs of HealthLink is, unfortunately, in a 1A switch.

We do port numbers out of a 1A to CLECs when they win one of our customers and move them to the CLEC switch. However we do not port numbers into the 1A switch unless the NPA-NXX combination of the number already exists in the switch. I have asked our network folks about the feasibility of porting a thousands block out of a 1A to another one of our switches, but I have not received a determination on that at this time.

If you have any questions please call me. Thanks

Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Tuesday, July 14, 2009 1:06 PM
To: 'Buyak, Sara*'
Subject: RE: IO-2009-0451

Sara,
See our responses below.

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com

From: Buyak, Sara* [mailto:s.buyak@psc.mo.gov]
Sent: Thursday, July 09, 2009 1:24 PM
To: KERN, ALAN G (ATTSI)
Subject: RE: IO-2009-0451

Hi Alan,

I just received a couple more questions to ask you:

1. Who has physical possession of (314)465(0-9)? AT&T's inventory shows 9 of 10 blocks in or underutilized. Bank of America

2. Why can't HealthLink use:

(314)206-8 assigned to a customer 247-2 assigned to a customer 247-5 assigned to a customer 247-6 assigned to a customer 247-8 assigned to a customer 260-2 assigned to a customer 260-5 5000-5054 are spare, 5055-5299 are ported out, 5300-5999 are spare and were offered to the customer, but the customer does not want to change from its existing 6XXX numbers 261-2 assigned to a customer 371-2 does not have 700 consecutive numbers 371-5 does not have 700 consecutive numbers 371-6 does not have 700 consecutive numbers 371-8 does not have 700 consecutive numbers 466-2 assigned to a customer 466-5 assigned to a customer 466-6 assigned to a customer 466-8 assigned to a customer 652-5 a 1A office and does not have 700 consecutive numbers 652-6 a 1A office and does not have 700 consecutive numbers 664-5 does not have 700 consecutive numbers 762-6 a 1A office 762-8 a 1A office

Thank you for your help,

Sara

KERN, ALAN G (ATTSI)

From: KERN, ALAN G (ATTSI)
Sent: Wednesday, July 22, 2009 2:52 PM
To: 'Buyak, Sara'
Subject: IO-2009-0451 Add'l Information

Sara,

I would like to follow up on a couple issues surrounding the HealthLink safety valve request. One of the issues we discussed last week was the impact of the 1A switch on the HealthLink request. The 1A switches have a limitation based upon their capacity. That is, there is a limitation on the number of NPA-NXX combinations and number groups (essentially thousands blocks) that can be loaded into a 1A switch. Once the number of NPA-NXXs and number groups reach the maximum, we are unable to add additional numbers to the switch. For this reason, we do not port out blocks of numbers to other AT&T switches in the rate center, since this would deplete the supply of available numbers in the switch. On the other hand, we certainly do port out numbers to CLECs as required by the FCC's rules. When a customer chooses to leave AT&T and begin receiving service from a CLEC, the customer's number is ported to the CLEC's switch, thus fulfilling our porting obligation to the CLEC.

As you know we have seven 1A switches in the St. Louis area. They are functioning well and our customers are not encountering any quality of service difficulties with these switches. Given these switches' operating performance, and the cost of replacing such assets, we are not planning to retire them in the near future. It is important to emphasize also that HealthLink has agreed to return nearly all of their existing numbers to us. They plan to keep a handful (5-10) of their main numbers for remote call forwarding to their new location. These few numbers are needed to help ensure that HealthLink can maintain business continuity after their move, an important objective to the company. Meanwhile, the number return will at the same time minimize the impact of a new numbering resource assignment for this important customer.

I hope this provides all of the information that you need. If not, please call me. Thanks

Alan

Alan Kern
State Legislative & Reg Affairs
AT&T Services, Inc
314-331-1610
alan.kern@att.com