

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Fidelity )  
Communication Services I, Inc., for Review )  
and Reversal of the North America Number )  
Plan Thousands-Block Pooling Administrator's )  
Decision to Withhold Numbering Resources )  
for the Rolla, Missouri, Exchange )

**File No. CO-2020-0091**

**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 30, 2019, Fidelity Communication Services I, Inc., 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, Somos, Inc., (NANPA) to withhold certain numbering resources from Fidelity in the Rolla, Missouri service area. Fidelity has been experiencing issues properly routing and rating phone calls in specific switches for which it donated blocks of numbers containing necessary local routing numbers (LRN). Fidelity further has a desire to capture all minutes of traffic traversing its switch, to create accurate carrier access billing (CABs) and ensure receipt of appropriate compensation for its switching function specifically related to the LRNs in three numbers blocks which it donated to the numbers pooling authority previously.

2. NANPA denied Fidelity's request for the LRNs based on its failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization. In other words, Fidelity may very well have the available telephone numbers; however, said numbers do not meet the required criteria.

3. Fidelity has requested that the Commission act on its request within 20 business days. Staff recommends that this request is reasonable.

4. Fidelity provided Staff with its Motion to Exhaust worksheets indicating the telephone number utilization of the covered service areas. Staff has examined Fidelity's request and supporting documentation. In Staff's opinion, Fidelity has demonstrated a verifiable need for the LRNs and has complied with 20 CSR 4240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the numbering resources.

**WHEREFORE,** Staff recommends that the Commission issue an order that:

(1). Determines Fidelity Communication Services I, Inc., 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 Fidelity Communication Services II, Inc.'s request for telephone numbers in the listed service area; and

(3). Complies with the suggestion of action within 20 business days; and

(4). Contains the following language:

Grant Fidelity's request for the 573 426-0 block in the Rolla rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Fidelity's original request.

Respectfully submitted,

**/s/ Whitney Payne**

Whitney Payne  
Senior Counsel  
Missouri Bar No. 64078  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-8706 (Telephone)  
(573) 751-9285 (Fax)  
[whitney.payne@psc.mo.gov](mailto:whitney.payne@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 15<sup>th</sup> day of October, 2019, to all counsel of record.

**/s/Whitney Payne**

## MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. CO-2020-0091

**From:** Kari Salsman  
John VanEschen  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve Fidelity Communication Services I, Inc. Request to overturn the North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources for the Rolla, Missouri, Exchange.

**Date:** October 15, 2019

On September 30<sup>th</sup>, Fidelity Communication Services I, Inc. (Fidelity) 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 Fidelity for additional telephone numbering resources in the Rolla telephone rate center (Application). Back in 2004 Fidelity donated several blocks of numbers to the pooling administrator. The company has since discovered that three of the blocks contained Local Routing Numbers (LRNs) and without the LRN's in the proper switch, Fidelity is experiencing issues with properly routing and rating calls. According to Fidelity, the numbering resources are necessary to eliminate the routing and rating issues associated with the LRN not residing in Fidelity's inventory. Specifically Fidelity is in need of the 573 426-0 block in the Rolla rate center to prevent routing, rating and billing issues.

In support of its Application, Fidelity provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Fidelity provided Staff a confidential copy of its telephone number utilization for the Rolla rate center.

Staff has examined Fidelity's request and supporting documentation, and in Staff's opinion, Fidelity's application complies with the requirements of 20 CSR 4240-28.016. Fidelity has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 573 area code is the 3<sup>rd</sup> quarter of 2027. Staff recommends the Commission approve Fidelity's request and order a reversal of the NANPA decision to deny the additional numbers.

Specifically, Staff recommends the Commission's order include a statement substantially as follows:

MO PSC CASE NO. CO-2020-0091  
OFFICIAL CASE FILE MEMORANDUM  
Page 2 of 2

Grant Fidelity's request for the 573 426-0 block in the Rolla rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Fidelity's original request.