

**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. IO-2012-0107
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

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

COMES NOW AT&T Missouri¹ and respectfully submits its response to the Staff's October 17 Recommendation, pursuant to the Commission's Order Setting Time for Responses.

1. On October 6, 2011, AT&T Missouri filed an Application under 47 C.F.R. 52.15(g)(3)(iv), for the benefit of St. Luke's East Hospital, requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator ("NANPA"), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the Lee's Summit, Missouri rate center.

2. Staff's October 17 Recommendation to the Commission reported that Staff examined AT&T's request and supporting documentation and that Staff concluded that AT&T Missouri had demonstrated a verifiable need for the additional telephone numbers. Thus, Staff recommended that the Commission approve AT&T Missouri's application and order a reversal of NANPA's decision to deny the additional numbers for St. Luke's East Hospital. At the same time, however, Staff suggested that the following language be contained in the Commission's Order: "The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator."

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

3. In its October 19 Order Setting Time for Responses, the Commission ordered that any responses to Staff's Recommendation, "specifically to Staff's suggestion of opening a new code," be filed by not later than 10 a.m. on October 24.

4. AT&T Missouri urges that the Commission approve its numbering resource application, for the reasons stated therein and for the reasons set forth both in Staff's Recommendation and Public Counsel's October 17 Recommendation. With respect to Staff's suggestion, AT&T Missouri emphasizes that its numbering request to NANPA was limited to a single thousands-block.² It is AT&T Missouri's understanding, based upon the currently available number pooling inventory, that a new code will indeed have to be opened in order to meet the numbering resource needs of St. Luke's East Hospital. To the extent that that proves to be so (following the issuance of the Commission's order), it is also AT&T Missouri's understanding that AT&T Missouri will only receive a single thousands-block of numbers and that the remaining nine thousands-blocks of numbers will be retained by NANPA for use by others. However, to the extent that AT&T Missouri receives from NANPA all ten of the thousands-blocks comprising the newly-opened code, AT&T Missouri commits to utilize just one thousands-block of numbers and to return the remaining nine thousands-blocks of numbers to NANPA.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter, and instruct NANPA to release the specific numbering resources described in AT&T Missouri's Application. AT&T Missouri further requests that if such specific resources are not available when the Commission issues its order, the Commission should direct NANPA to provide such resources as are available to meet Saint Luke's East Hospital's numbering resource needs.

² See, Application, Exhibit B, Section 1.2 (stating: "Number of Thousands-Blocks Requested: 1").

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

JEFFREY E. LEWIS #62389

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

CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on October 24, 2011.


Robert J. Gryzmala

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

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