

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of MCI)	
Communications Services, Inc., d/b/a Verizon)	
Business Services for Review and)	Case No.
Reversal of the North American Number Plan)	
Administrator's Decision to Withhold Numbering)	
Resources.)	

MCI COMMUNICATIONS SERVICES, INC.
d/b/a VERIZON BUSINESS SERVICES'
APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW MCI Communications Services, Inc., d/b/a Verizon Business Services ("Verizon") and files this verified Application and Motion for Expedited Treatment, pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16) and 47 C.F.R. 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an Order on an expedited basis that reviews and reverses the decision of the Pooling Administrator, NeuStar, Inc. ("PA"), to withhold certain numbering resources from Verizon in the form of a block of 2,000 contiguous numbers to meet the needs of a customer in the 314 NPA. In support of its application, Verizon states as follows:

1. MCI Communications Services, Inc. (MCI) is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 600 Hidden Ridge, HQE02H45, P.O. Box 152092, Irving, Texas 75015-2415. MCI is authorized to do business in Missouri and its fictitious name Verizon Business Services is duly registered with the Missouri Secretary of State.¹ A Certificate of Good Standing from the Missouri Secretary of State is attached hereto as Exhibit A. MCI is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

¹ MCI filed a copy of the registration of the fictitious name "Verizon Business Services" with the Commission on December 23, 2005. See, In the Matter of the name Change of MCI Communications Services to Verizon Business Services, Case No. XN-2006-0275

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

Carl J. Lumley
Leland B. Curtis
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
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3. On or about June 9, 2006, Verizon submitted a Thousands-Block Application Form, Part 1A, for the assignment of a block of 2,000 contiguous numbers to meet the needs of a customer in the 314 NPA. The customer's specific needs to implement its plans are described on Exhibit E. Verizon 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 Worksheet.

4. Verizon submitted the request because Verizon does not have such a block of numbers which could be used to serve the customer.

5. On or about June 9, 2006, the PA denied the request on the grounds that Verizon had not met the Thousands-Block Number Pooling Administration Guidelines (Section 8.3.4), which states that applicants must demonstrate that existing numbering resources for the rate center will exhaust within 6 months. The following Highly Confidential Exhibits are submitted herewith under seal:²

- a. Exhibit B: Thousand-Block Application Form, Part 1A;
- b. Exhibit C: Months to Exhaust and Utilization Certification Worksheet;

² Verizon has filed a motion herewith pursuant to 4 CSR 240-2.085 for the issuance of a standard protective order and uses the phrase "highly confidential" as defined therein. The exhibits submitted herewith concern a specific customer and market-specific information relating to services offered in competition with others.

- c. Exhibit D: The PA's decision denying additional numbering resources;
- d. Exhibit E: Copy of the customer letter to the Missouri Public Service Commission.

6. Under existing procedures, the PA 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 reaffirm or overturn the PA's decision to withhold numbering resources.³ Thus, the Missouri Commission has the authority to "affirm or overturn the PA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁴ Moreover, the FCC gave the states the flexibility to direct the PA to assign additional numbering resources to carriers that have demonstrated a verifiable need.⁵ The FCC recognized that in many instances, the failure to address a request for additional numbering resources can impair a carrier's ability to stay in or expand business.⁶ 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."⁷

7. Verizon seeks the Commission's expedited direction to overturn the PA's decision to withhold numbering resources. This Commission has previously overturned the PA's decision to withhold numbering resources for other carriers.

³ 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).

⁴ Id.

⁵ Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, December 12, 2001, paragraph 61.

⁶ Id. at paragraph 66.

⁷ Id.

8. Verizon does not have any pending 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.

9. Verizon does not have any annual report or assessment fees that are overdue in Missouri.

10. Verizon asks that the Commission act on this request as soon as possible and no later than within ten (10) business days as envisioned by the FCC. Expedited action is needed to meet the customer's needs. There will be no negative effective on other customers or the general public if the Commission acts expeditiously. This pleading was filed as soon as possible.

WHEREFORE, Verizon respectfully requests that the Commission overturn the PA's previous determination in this matter on an expedited basis as envisioned by the FCC, and instruct the PA to release the numbering resources necessary for Verizon to serve its customer.

Respectfully submitted

/s/ Carl J. Lumley

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d/b/a Verizon Business Services

VERIFICATION

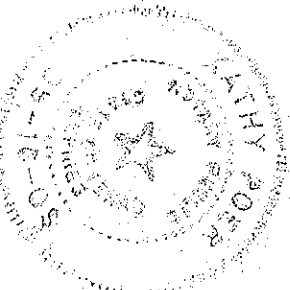
STATE OF Texas)
)
COUNTY OF Dallas) ss:

I, Godfrey Chisanga, being first duly sworn, depose and state that I am over the age of 21 years, sound of mind, and the Manager of MCI Communications Services, Inc. d/b/a Verizon Business Services, the Applicant in the subject proceeding, and that I am authorized to make this Verification on behalf of MCI Communications Services, Inc. d/b/a Verizon Business Services; that I have read the foregoing Application and know the contents thereof; and that the same is true and correct to the best of my knowledge, information, and belief. Further, I verify that the Applicant will comply with all other applicable rules and regulations. I also verify that Carl J. Lumley, Leland B. Curtis, and Curtis, Heinz, Garrett & O'Keefe, PC, 130 S. Bemiston, Suite 200, Clayton, Missouri, 63105 are authorized to sign all pleadings and documents necessary to receive the approval of the Missouri Public Service Commission of the foregoing Application, and to represent MCI Communications Services, Inc. d/b/a Verizon Business Services in this proceeding.

Godfrey Chisanga

Subscribed and sworn to before me this 12 day of June, 2006.

My commission expires: 9-16-09



Certificate of Services

A true and correct copy of the foregoing document was either emailed, faxed or mailed this 15th day of June, 2006, to:

General Counsel
Missouri Public Service Commission
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Jefferson City, MO 65102
generalcounsel@psc.mo.gov

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/s/ Carl J. Lumley
