

**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 Number Plan	)	Case No. TO-2009-0106
Thousands-Block Pooling Administrator's	)	
Decision to Withhold Numbering	)	
Resources.	)	

**STAFF RECOMMENDATION**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its recommendation respectfully states as follows:

1. On September 19, 2008, Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri" or "Company") filed an Application And Motion For Expedited Treatment,<sup>1</sup> requesting that the Commission review and reverse a decision of the North American Thousands-Block Pooling Administrator, NeuStar, Inc. ("Pooling Administrator"), to withhold certain numbering resources from AT&T Missouri.

2. Also on September 19, the Commission issued an order that, among other things, directed the Staff to file a recommendation concerning the Application by September 29, 2008, or as soon thereafter as possible.

3. The numbering resources AT&T Missouri requested from the Pooling Administrator consist of one (1) thousands-block from which 400 consecutive direct inward dial ("DID") numbers may be drawn. The numbers are to be within: a) the 816 NPA, b) the Lee's Summit rate center (KSCYMO41DS0), c) an NXX ending in 7, and d) the range of 0000 through 4399 (*i.e.*, 816-NX7-0000 through 816-NX7-4399). AT&T

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<sup>1</sup> The filing was made pursuant to 47 CFR. 52.15(g)(3)(iv), 4 CSR 240-2.060 and -2.080(16), and 4 CSR 240-37.040.

Missouri states that the requested thousands-block is necessary to accommodate Saint Luke's Health System's (St. Luke's") expansion of its Saint Luke's East – Lee's Summit Hospital. The Company asserts that it currently has no thousands-blocks available in its Lee's Summit rate center that would meet the needs of Saint Luke's.

4. According to the Central Office Code (NXX) Assignment Guidelines, Section 4.3.1, 2003, carriers requesting numbering resources must demonstrate that existing codes within the rate center will exhaust within six months and meet the utilization level of 75%.

5. On September 11, 2008, the Pooling Administrator responded and denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the months to exhaust criterion.

6. This Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that the Company has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. (47 C.F.R. § 52.15(g)(4)).

7. The Staff agrees that AT&T Missouri has met the test. In the attached Memorandum (Appendix A), the Staff explains that, although AT&T Missouri currently does have in its inventory one (1) thousand-block of telephone numbers, it is unsuitable to accommodate the request of Saint Luke's for 400 DID telephone numbers in the 816 NPA with the last digit ending in 7 within the thousand-block ranges of 0000 through 4000, in the Lee's Summit rate center. Thus, without a Commission order approving AT&T Missouri's request to receive one of the identified number blocks, the Company

will be unable to meet the needs of its customer. Accordingly, the Staff recommends that the Commission issue an order overturning the Pooling Administrator's decision.

WHEREFORE, the Staff recommends that the Commission, at its earliest convenience, issue an order that:

- (1) determines that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2) reverses the decision of the Pooling Administrator and grants AT&T Missouri one (1) thousand-block of telephone numbers within the 816 NPA, with the NXX ending in 7, and in a range beginning with 0000, 1000, 2000, 3000, or 4000 in the Lee's Summit rate center, or in the event one of the identified blocks is unavailable, any other suitable block.

Respectfully submitted,

/s/ Dennis L. Frey

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#### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29<sup>th</sup> day of September 2008.

/s/ Dennis L. Frey