

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2005-0397

Socket Telecom, LLC

From: Sara Buyak
Telecommunications Department

William Voight 5-19-05

/s/ Marc Poston 5-19-05

Utility Operations Division/Date

General Counsel's Office/Date

Subject: Staff Recommendation to Approve Request to Override Decision of the North American Numbering Plan Administrator, and Grant Expedited Approval.

Date: May 19, 2005

On May 2, 2005, Socket Telecom, LLC (Socket) filed a request for additional numbering resources with the Missouri Public Service Commission (Commission). Socket is a competitive local exchange carrier with principal Missouri offices in Columbia. Pursuant to 4 CSR 240-2.080(16), Socket also filed a Motion for Expedited Treatment requesting the Commission grant Socket's request "as soon as possible." Socket requests the Commission to review and reverse a decision of NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator), to withhold certain numbering resources to serve the needs of customers in the Springfield Local Access and Transport Area (LATA 522). Included in this filing is Socket's State of Missouri Certificate, Months to Exhaust Utilization Certification Worksheet, and the Months to Exhaust and Utilization Certification Worksheet Response.

Background

On April 28, 2005, Socket submitted an application to the Pooling Administrator for a block of 1,000 telephone numbers in the Springfield rate center to establish a location routing number. On April 29, 2005, NeuStar denied Socket's request because the months to exhaust criteria exceeds 6 months and the utilization rate was 0.806%. According to the Central Office Code Assignment Guidelines, Section 4.3.1, code holders requesting growth codes must demonstrate that existing codes within the rate center will exhaust within 6.0 months and meet the utilization level of 75%.¹ In response to Socket's application, NeuStar determined Socket already had sufficient telephone numbers to last beyond six months. In order to provide Socket with additional telephone numbers, Socket will need to obtain a decision from the Missouri Commission to reverse NueStar's decision.

Socket is requesting the additional numbering resources in order to establish a location routing number. A location routing number is a 10-digit number, in the format NPA-NXX-

¹ Administrator's Response/Confirmation, remarks, DR 11, March 27, 2002.
Central Office Code (NXX) Assignment Guidelines, November 21, 2003.

XXXX uniquely identifying a switch or point of interconnection within a Local Access and Transport Area. The NPA-NXX portion of the location routing number is used to route calls to numbers that have been ported from other telephone carriers. Telephone number porting is used to enable customers to keep their original telephone number when changing telephone company providers. In this instance, Socket wants calls placed to its customers in the Springfield area to be routed to Socket's point of interconnection with Southwestern Bell Telephone Company in the Springfield rate center. Without the location routing number, Socket states that it is unable to provide telecommunications service to satisfy customer requests.

Socket states that although it has an adequate supply of telephone numbers to satisfy current customer demand, it is unable to provide adequate service to customers who desire to port their telephone numbers from another carrier. Socket states that it is necessary to receive the additional 1,000 block of numbers to establish a location routing number to reflect its point of interconnection with Southwestern Bell Telephone Company in the Springfield telephone exchange. Absent the location routing number, Socket states it is unable to port numbers from other carriers, and that it currently has customers "on hold" because of this problem.

In order to establish a location routing number a carrier must be the assigned "code holder" for a particular NPA NXX. Only one location routing number can be established from the block of 10,000 telephone numbers. Since Socket only intends to use 1,000 telephone numbers (only one of which is the actual LRN), Socket would be required to return nine 1,000 blocks to the Pooling Administrator. The remaining 999 numbers in the retained 1,000 block would then be available for Socket to assign to customers. According to the Location Routing Number Assignment Practices, carriers requesting an additional NPA NXX to establish a location routing number must return any blocks not justified for retention in its inventory². Thus, Socket would be required to return the unused nine 1,000 blocks to the Pooling Administrator to be used to satisfy future industry requests.

Recommendation

The Telecommunications Department Staff (Staff) reviewed the months to exhaust forecast and utilization data that Socket submitted to the Pooling Administrator. Socket's months to exhaust exceeds 6 months and the utilization level of 0.806% is below the FCC guidelines of 75% which is required before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (h).³ Nevertheless, in Staff's opinion, Socket's desire for a location routing number in the Springfield Local Access and Transport Area demonstrates a verifiable need for additional numbering resources.

Staff has explored other ways to accommodate Socket's request besides having the Missouri Commission reverse NeuStar's decision. For example, another carrier has a NXX block within the Springfield rate center from which Socket could designate a location routing number. Staff contacted the carrier assigned to this NXX block about the prospect of transferring the assignment of the (417) NXX to Socket; however the carrier declined to

² Location Routing Number Assignment Practices, January 23, 2004, 2 (1).

³ Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

relinquish its status as “code holder of the ten thousand block” to Socket. Although the Missouri Commission could conceivably order the other carrier to relinquish “code holder status” of the NXX block, Staff believes a less contentious solution is to simply grant Socket’s request. Therefore, the Staff recommends approval of Socket’s request for the Commission to override Neustar’s denial of the needed code.

Staff recommends the Commission issue an Order Approving Socket’s request to override the decision of the Pooling Administrator denying Socket’s request for 1,000 additional telephone numbers in the Springfield rate center. Staff further recommends the Commission direct Socket to return nine of the ten 1,000 blocks of telephone numbers to the Pooling Administrator. Therefore, the Staff recommends language in the Commission’s order be substantially as follows:

1. The Pooling Administrator is to assign Socket 10,000 telephone numbers in the Springfield rate center.
2. Socket shall return nine of the ten 1,000 blocks of telephone numbers to the Pooling Administrator.

Staff is unaware of any other filing that may affect or be affected by this filing.

☒ **The Company is not delinquent in filing an annual report and paying the PSC assessment.**

☐ **The Company is delinquent. Staff recommends the Commission grant the requested relief/action on the condition the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this case after it has corrected the delinquency.**

(☐ No annual report ☐ Unpaid PSC assessment. Amount owed:)