

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2005-0323

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri

From: Sara Buyak
Telecommunications Department

William Voight / Natelle Dietrich
4-7-05 4-7-05
Utility Operations Division/Date

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General Counsel's Office/Date

Subject: Staff Recommendation to Approve Request to Override decision of the North American Numbering Plan Administrator

Date: April 6, 2005

On March 24, 2005, Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (SBC) filed a proposed request to review and reverse a decision of NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator), to withhold five consecutive blocks of 1,000 Direct Inward Dial numbers to service the needs of BJC HealthCare, a customer of SBC in the Harvester rate center. BJC HealthCare will be opening a new hospital in O'Fallon, to be called Progress West Health Center. SBC requires these number resources to provide basic local telecommunications service on a non-Metropolitan Calling Area/Metropolitan Calling Area (MCA) basis. Included in this filing is the Thousands-Block Application Form – Part 1A (Part 1) for the Harvester rate center, and Pooling Administrator's Response/Confirmation for the Harvester rate center, the Months To Exhaust and Utilization Certification Worksheet, and a letter from BJC Healthcare.

Background

On February 10, 2005, in a letter to SBC, BJC requested five blocks of 1,000 DID numbers in the MCA with the prefix beginning with 636-xx2, 636-xx4, and 636-xx7 stating that its phone systems will not accept blocks beginning with 636-xx0, 636-xx8, or 636-xx9.

On February 17, 2005, SBC submitted an application to the Pooling Administrator for five blocks of 1,000 telephone numbers in the Harvester rate center. SBC's application, known as a Part 1 Request, was made to obtain a block dedicated to MCA numbers for the Harvester rate center.

On February 17, 2005, the Pooling Administrator denied the request for five consecutive 1,000 telephone numbers because the utilization rate is 58.469 percent. 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 The Months to Exhaust and Utilization

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

Certification Worksheet includes the previous 6-month growth history, forecast for the next 12 months, average monthly forecast, months to exhaust, utilization level, and telephone numbers for assignment.

The Telecommunications Department Staff (Staff) reviewed the months to exhaust forecast and utilization data that SBC submitted to the Pooling Administrator. SBC's utilization level is 58.469 %. The utilization level of 58.469% is below the FCC's 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).²

Recommendation

SBC does not meet the utilization rate because it is 58.469% which is below the required utilization rate of 75% as set in the FCC guidelines. Because Missouri requires separate codes to serve MCA and non-MCA and because SBC received a special request from BJC for five blocks of 1,000 DID numbers in the MCA with the prefix beginning with 636-xx2, 636-xx4, and 636-xx7 for five consecutive blocks of 1,000 additional telephone numbers, SBC has demonstrated a verifiable need for telephone numbers in the Harvester rate center.

Staff recommends the Commission issue an Order Approving SBC's request to override the decision of NANPA denying SBC's request for five consecutive blocks of 1,000 additional telephone numbers with 636-xx2, 636-xx4, and 636-xx7. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

- Five consecutive blocks of 1,000 additional telephone numbers with 636-xx2, 636-xx4, and 636-xx7.

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:)

² Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.