

**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-2009-0010
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 July 2, 2008, Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri") 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. On July 3, 2008, the Commission issued an order that, among other things, directed the Staff to file a recommendation concerning the Application by July 14, 2008, or as soon thereafter as possible.

3. The numbering resources AT&T Missouri requested from the Pooling Administrator on June 16, 2008, consist of one (1) thousands-block within the 314 NPA, the 684 NXX, and the 7XXX range (*i.e.*, 314-684-7000 through 314-684-7999), in the Ladue rate center (STLSMO20DSA). AT&T Missouri states that the requested thousands-block is necessary to accommodate the expansion of the corporate

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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.

headquarters of Express Scripts, Inc. (“Express Scripts”) to an additional nearby building, while still enabling Express Scripts to maintain its current six-digit dialing plan. AT&T Missouri asserts that it currently has no thousands-blocks available in its Ladue rate center in order to meet Express Scripts’ needs.

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 June 16, 2008, the Pooling Administrator responded and denied AT&T Missouri’s request on the grounds that AT&T Missouri had not met the utilization criteria.

6. This Commission may overturn the Pooling Administrator’s decision to withhold numbering resources from AT&T Missouri if the Commission determines that AT&T Missouri 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 notes that AT&T Missouri is currently unable to provide Express Scripts with a block of one thousand DID telephone numbers in the NPA-NXX of 314-684 and the range of 7000-799. Without an order from the Commission approving AT&T Missouri’s request to receive the desired block in the Ladue rate center, AT&T Missouri 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's request to receive one (1) thousands-block within the 314 NPA, the 684 NXX, and the 7XXX range (*i.e.*, 314-684-7000 through 314-684-7999) in the Ladue rate center, or in the event the requested block is unavailable, any other suitable block.

Respectfully submitted,

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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 15<sup>th</sup> day of July 2008.

/s/ Dennis L. Frey