## **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 the North American Numbering Plan ) Thousands-Block Pooling Administrator's Decision to ) Withhold Numbering Resources. )

Case No. TO-2011-0050

## **PUBLIC COUNSEL'S RECOMMENDATION**

COMES NOW the Office of the Public Counsel (Public Counsel) and advises the Public Service Commission that the Office of the Public Counsel supports AT&T's request that the Commission direct the North American Numbering Plan Thousands-Block Pooling Administrator (Neustar) to release two sequential thousand blocks of numbers from a single central office code for use by AT&T to serve Liberty Hospital.

Public Counsel believes that the request for numbering resources has considerable merit. The requested blocks will facilitate a simplified and coordinated dialing pattern addressing the Hospital's need to provide efficient and easy-to-use telecommunications service throughout the facility for the benefit of patients, visitors, physicians and administrative personnel. Further, the request advances the interest of the general public in Liberty Hospital's regional service area through the use of a simplified dialing pattern which reduces the potential for confusion and inconvenience associated with misdialed calls. Granting the request is consistent with the public interest.

Based on AT&T's August 24, 2010, application and attached documentation as well as independent contact with Liberty Hospital, Public Counsel offers the following in support of AT&T's request for reversal of the North American Numbering Plan Administrator's decision to withhold numbering resources.

- 1. The request will not waste numbering resources since Liberty Hospital intends to return 1600 displaced numbers;
- 2. The request provides flexibility in conserving central office codes since the Hospital is willing to accept two sequential 1000 blocks from any designated central office code;
- 3. The request will reduce confusion and improve efficiency by consolidating the Hospital's numbering resource use from four central office codes into one central office code.
- 4. The seamless, coordinated use of numbering resources advances the Hospital's mission benefiting Missouri residents and the general public;
- 5. The review process allows the Commission to override the administrator when the strict application of the guidelines would not be proper and in keeping with the public interest. This is an appropriate case for the Commission to exercise its authority.

For these reasons, Public Counsel suggests to the Commission that the granting of this request for Liberty Hospital is consistent with number conservation goals, provides a needed numbering resources for the Hospital, will result in a benefit to consumers and to the public, and is otherwise consistent with the public interest. Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ Lewis R. Mills, Jr.

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 25<sup>th</sup> day of August 2010:

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/s/ Lewis R. Mills, Jr.