

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2005-0312

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 18, 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 a block of 1,000 numbers to service the needs of St. Louis Community College, a customer of SBC in the Pond rate 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 Pond rate center, and Pooling Administrator's Response/Confirmation for the Pond rate center, the Months To Exhaust and Utilization Certification Worksheet, and a letter from St. Louis Community College.

Background

On November 30, 2004, in a letter to SBC St. Louis Community College requested a block of 1,000 DID numbers in the MCA for the Pond rate center which must be in the 2000-2999 block so that they may internally route numbers on a five-digit basis.

On November 9, 2004, SBC submitted an application to the Pooling Administrator for a block of 1,000 telephone numbers in the Pond rate center. SBC's application, known as a Part 1 Request, was made to obtain a block dedicated to MCA numbers for the Pond rate center.

On November 9, 2004, the Pooling Administrator denied the request for 1,000 telephone numbers because the utilization rate is 46.900 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 Certification Worksheet includes the previous 6-month growth history, forecast for the next 12 months,

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

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 46.900 %. The utilization level of 46.900% 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 46.900% 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 St. Louis Community College for 1,000 DID numbers in the MCA which must be in the 2000-2999 range so that they may internally route numbers on a five-digit basis, SBC has demonstrated a verifiable need for a block of 1,000 additional telephone numbers in the Pond rate center.

Staff recommends the Commission issue an Order Approving SBC's request to override the decision of NANPA denying SBC's request for an additional 1,000 code. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

- A block of 1,000 DID numbers in the MCA which must be in the 2000-2999 range so that they may internally route numbers on a five-digit basis .

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.