

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the matter of the Application of	)	
CenturyTel of Missouri, LLC	)	
For Review and Reversal of North American	)	
Number Plan Administrator's Decision To	)	Case No. _____
Withhold Numbering Resources for the	)	
Wentzville, Missouri Rate Center.	)	

**CENTURYTEL OF MISSOURI, LLC'S  
APPLICATION AND  
MOTION FOR EXPEDITED TREATMENT**

Comes now CenturyTel of Missouri, LLC ("CenturyTel") and files this verified application, pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), and 47 C.F.R 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an order that reviews and reverses the recent decision of the North American Numbering Plan Administrator, NeuStar, Inc., ("NANPA") to withhold certain numbering resources from CenturyTel in the form of two blocks of 1,000 numbers within an existing MCA NXX code assigned to the Wentzville, Missouri rate center. Whereas MCA numbers within CenturyTel's Wentzville MCA NXX may be exhausted within the next few weeks, CenturyTel requires two blocks of 1,000 numbers in the Wentzville rate center to service the future needs of customers requiring MCA numbers. In support of its Application, CenturyTel states as follows:

1. CenturyTel is a Louisiana limited liability corporation that is duly authorized to do business in the state of Missouri. Copies of CenturyTel's Certificate of Authority to transact business in Missouri from the Missouri Secretary of State were filed in Case No. TM-2002-232, and are incorporated herein by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G). CenturyTel's principle place of business is 1151 CenturyTel Drive, Wentzville, Missouri 63885. CenturyTel is a "telecommunications company" and a "public utility" as those terms are defined

in §386.020, RSMo 2000, and, thus, is subject to the jurisdiction, supervision and control of this Commission.

2. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

Larry W. Dority  
FISCHER & DORITY, P.C.  
101 Madison, Suite 400  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383

3. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Wentzville exchange. CenturyTel is close to exhaustion for the MCA NXX numbers in this rate center.

4. Accordingly, on or about December 14, 2004, CenturyTel submitted a Central Office Code (NXX) Assignment Request to NANPA for the assignment of NXX resources necessary to meet future MCA requests. A copy of the application is attached as Exhibit A.<sup>1</sup> CenturyTel completed the application in accordance with NANPA's Central Office Code (NXX) Assignment Guidelines and filled out the necessary Months to Exhaust Certification Worksheet, which is attached as Exhibit B.

5. CenturyTel submitted the request for new MCA central office (NXX) codes because CenturyTel is on the verge of exhausting its MCA numbers within the Wentzville central office. While CenturyTel does have numbers available within non-MCA NXXs in this rate center, CenturyTel is unable to use those numbers due to the Commission's requirement that

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<sup>1</sup> At the time of its December 14, 2004 submission, CenturyTel requested a new MCA NXX Code containing 10,000 numbers assigned to the Wentzville rate center. Since that time, and in the course of recent discussions with the Staff of the Commission regarding this issue, CenturyTel is now aware that 9,000 numbers in an MCA NXX Code for the Wentzville rate center recently were returned to NeuStar (*Order Granting Additional Numbering Resources*, Case No. TO-2005-0062). As a result, once the instant State Waiver is received, CenturyTel will be requesting two blocks of 1,000 numbers from that 9,000 number pool.

MCA and non-MCA service be provided over segregated NXX codes. CenturyTel cannot assign individual numbers as MCA; rather, the entire NXX must be so designated.

6. On or about December 17, 2004, NANPA denied the request on the grounds that CenturyTel had not met the rate center-based months-to-exhaust criteria set forth in the Central Office Code (NXX) Guidelines, notwithstanding the fact that CenturyTel, in the near future, will not have the numbering resources needed to satisfy its customers' MCA demands in the switch at issue. That decision is attached as Exhibit C.

7. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000 Order in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and the state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources. (Report and Order and Further Notice of Proposed Rule Making, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; see also 47 C.F.R. 52.15(g)(3)(iv), attached hereto and marked as Exhibit D). Thus, the Missouri Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein." Id.

8. CenturyTel seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has previously overturned NANPA's decision to withhold numbering resources in its Order Granting Additional Numbering Resources, In the Matter of the Application of GTE Midwest Incorporated d/b/a Verizon Midwest For Review and Reversal of North American Number Plan Administrator's Decision To Withhold Numbering

Resources, Case No. TO-2002-481, June 20, 2002; *see also*, Order Granting Additional Numbering Resources, In the Matter of the Application of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri for Review and Reversal of North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. IO-2003-0318, April 1, 2003.

9. CenturyTel does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

10. CenturyTel does not have any annual report or assessment fees that are overdue in Missouri.

11. CenturyTel requests that the Commission act upon this Application as soon as possible because CenturyTel, in the near future, will not have the numbering resources needed to satisfy its customers' MCA demands in the Wentzville rate center. This pleading was filed as soon as it could have been, after it was determined that NANPA would require a decision from the Commission before releasing the numbering resources. There will be no negative effect on CenturyTel's customers or the general public if the commission acts in an expedited manner.

Wherefore, CenturyTel respectfully requests that the Commission overturn NANPA's previous determination in this matter as soon as possible, and instruct NANPA to release the numbering resources necessary to meet the needs of CenturyTel's customers as set forth herein.

Respectfully submitted,

/s/ Larry W. Dority

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Attorneys for CenturyTel of Missouri, LLC

**VERIFICATION**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE        )

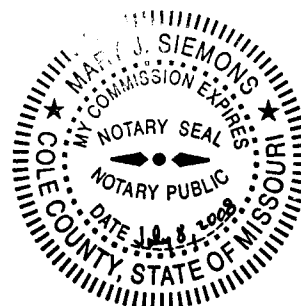
I, Arthur P. Martinez, of lawful age, being first duly sworn upon my oath, state that I am the Director-Government Relations of CenturyTel and that I am authorized to execute this Application on behalf of CenturyTel of Missouri, LLC; and that the facts set forth in the foregoing Application are true to the best of my knowledge, information and belief.

  
Arthur P. Martinez

Subscribed and sworn to me, a Notary Public, on this 20<sup>th</sup> day of December, 2004.

  
Mary J. Siemons – Notary Public

My Commission expires July 8, 2008.



## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, emailed or mailed this 20th day of December, 2004 to:

Mr. Mike Dandino  
Assistant Public Counsel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Mr. Dan Joyce,  
General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

/s/ Larry W. Dority

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Larry W. Dority