

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

In the Matter of the Application of Southwestern)
Bell Telephone, L.P., d/b/a AT&T Missouri, for)
Review and Reversal of North American) Case No. TO-2007-0098
Numbering Plan Administrator's Decision to)
Withhold Numbering Resources)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On September 11, 2006, Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, filed an application requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator (NANPA), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the form of four thousand-number blocks of numbers to meet the needs of its customers, J.P. Morgan Chase Bank (J.P. Morgan), in the 816-673 NPA-NXX.

2. 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).

3. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an Order from the Commission approving AT&T Missouri's request to receive the desired NPA/NXX codes in the Kansas City rate center, AT&T Missouri

will be unable to offer the service J.P. Morgan requires to serve its clients. Staff recommends that the Commission issue an order overturning the NANPA'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;
- (2) reverses the decision of the NANPA and approves AT&T Missouri's request to receive four blocks of one thousand telephone numbers for the NPA-NXX of 816-673 in the ranges of 2,000 – 4,999 and 7,000 – 7,999, and
- (3) grants AT&T Missouri any other suitable blocks that meet J.P. Morgan's request, if the requested 816-673 blocks are unavailable.

Respectfully submitted,

/s/ William K. Haas
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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 and to Kimberly Miller, NeuStar Legal Department, 2000 M Street NW, Suite 600, Washington, DC 20036, this 20th day of September 2006

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2007-0098

Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 9-20-06
Utility Operations Division/Date

William Haas 9-20-06
General Counsel's Office/Date

Subject: Staff Recommendation to Approve AT&T's Request to Override a Decision by the North American Numbering Plan Administrator (NANPA)

Date: September 18, 2006

SUMMARY: AT&T Missouri (AT&T) has requested that the Commission reverse a decision by the North American Numbering Plan Administrator, which denied AT&T's request for four blocks of one thousand telephone numbers in the Kansas City rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On September 11, 2006, AT&T filed with the Missouri Public Service Commission (Commission) a request for four blocks of one thousand telephone numbers to be assigned to the Kansas City rate center. AT&T states that it was denied the request by NANPA because the Months to Exhaust and Utilization Worksheet did not meet the utilization criteria of 75%. AT&T requests the Commission review and reverse the decision of NANPA.

AT&T states that it submitted the necessary worksheets to NANPA, and offers copies of those documents as Exhibits C, D, and E to its application in this Case. AT&T was denied the additional telephone numbers because it did not meet the necessary requirements established by the Federal Communications Commission. AT&T does have unused telephone numbers available in the Kansas City rate center; however, it is unable to meet the customer's request for four one thousand telephone numbers in the (816) 673 in the ranges of 2000-4999 (i.e., three consecutive blocks) and 7,000 – 7,999 (i.e., one block).

RECOMMENDATION: AT&T does not meet requirements for additional telephone numbers because the utilization criteria does not meet the required utilization rate of 75% as set forth in the FCC guidelines. However, AT&T does not have four blocks of one thousand telephone numbers in the Kansas City rate center in the ranges of 2,000 – 4,999 and 7,000 – 7,999. For this reason, AT&T has demonstrated a verifiable need for four blocks of one thousand additional numbers in the Kansas City rate center. Therefore, the Staff recommends approval of AT&T's application. Additionally, the Staff recommends the Commission's order include the statement substantially as follows:

1. AT&T's request for four blocks of one thousand telephone numbers for the (816) 673 in the ranges of 2,000 – 4,999, and 7,000 – 7,999 is granted.

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:**)

