

**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 Number Plan Thousands-)
Block Pooling Administrator's Decision to)
Withhold Numbering Resources)

Case No. TO-2008-0153

STAFF RECOMMENDATION

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

1. On November 9, 2007, Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri filed an application and Motion for Expedited Treatment under 47 C.F.R. 52.15(g)(3)(iv), requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Pooling Administrator (NANPA), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri. The numbering resources are required in order to accommodate the needs of Jim Butler Chevrolet ("Butler Chevrolet") located in Fenton, Missouri. The numbering resources AT&T Missouri requested consist of a single block of one thousand numbers within the NPA-NXX of 636-717 in the Fenton rate center, and within any of the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999 or 9000-9999 from which one hundred (100) sequential telephone numbers can be drawn to meet the needs of Butler Chevrolet.

2. The Pooling Administrator had denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the 75% utilization criteria.

3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that AT&T Missouri

had demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(3)(iv).

4. 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 block in the Fenton rate center, AT&T Missouri will be unable to meet the needs of its customer. 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 for a single block of one thousand telephone numbers within the NPA-NXX of 636-717 in the Fenton rate center, and within any XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 7000-7999 or 9000-9999, or if the requested block is unavailable to grant it any other suitable block.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission

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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 the Legal Department, NeuStar, 1800 Sutter Street, Suite 780, Concord, CA 94520, this 19th day of November 2007.

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No.TO-2008-0153
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 11/15/07
Utility Operations Division/Date

William Haas 11/15/07
General Counsel's Office/Date

Subject: Staff Recommendation to Approve AT&T's Request to Override a Decision by the Pooling Administrator

Date: November 15, 2007

SUMMARY: AT&T Missouri (AT&T) has requested that the Commission reverse a decision by the Pooling Administrator, which denied AT&T's request for one block of one thousand telephone numbers in the Fenton rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On November 9 2007, AT&T filed with the Missouri Public Service Commission (Commission) a request for one block of one thousand telephone numbers to be assigned to the Fenton rate center. AT&T states that it was denied the request by the Pooling Administrator because the Utilization Worksheet did not meet the utilization of 75% criteria. AT&T requests the Commission review and reverse the decision of the Pooling Administrator.

AT&T states that it submitted the necessary worksheets to the Pooling Administrator, and offers copies of those documents as Exhibits B, 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 Fenton rate center. AT&T is unable to meet Butler Chevrolet's request for 100 sequential direct inward dial (DID) Metropolitan Calling Area (MCA) numbers to accommodate the upgrading of their facilities. Specifically, AT&T requests one block of one thousand telephone numbers in the NPA of 636-717 and an XXXX within the range of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999, or 9000-9999 to meet the needs of Butler's request for 100 sequential DID numbers for the MCA.

RECOMMENDATION: AT&T does not meet requirements for additional telephone numbers because the months to exhaust and utilization does not meet the required criteria as set forth in the FCC guidelines. AT&T does have unused telephone numbers available in the Fenton rate center; however, it is unable to meet the customer's request for 100 sequential DID numbers. Specifically AT&T requests one block of one thousand MCA telephone numbers in the NPA-NXX of 636-717 within the range of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999, or 9000-9999 in the MCA. For this reason, AT&T has demonstrated a verifiable need for one block of one thousand additional MCA telephone numbers in the Fenton 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 one block of one thousand MCA telephone numbers in the NPA-NXX of 636-717 within the range of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999, or 9000-9999 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:)

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

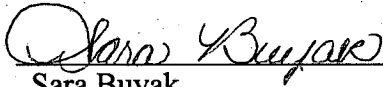
In the Matter of the Application of)
Southwestern Bell Telephone Company)
d/b/a AT&T Missouri For Review and)
Reversal of the North American Number)
Plan Thousands-Block Pooling)
Administrator's Decision to Withhold)
numbering Resources.)

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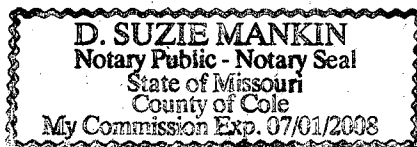
AFFIDAVIT OF Sara Buyak

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Sara Buyak, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in preparing the accompanying staff recommendation and that the facts therein are true and correct to the best of her knowledge and belief.


Sara Buyak

Subscribed and affirmed before me this 15th day of November, 2007
I am commissioned as a notary public within the County of Cole,
State of Missouri and my commission expires on 07-01-2008




NOTARY PUBLIC