

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2005-0406

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri

From: Sara Buyak
Telecommunications Department

William Voight 5-23-05

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/s/ David A. Meyer 5/23/05

Utility Operations Division/Date

General Counsel's Office/Date

Subject: Staff Recommendation to Approve Request to Override Decision of the North American Numbering Plan Administrator

Date: May 20, 2005

On May 10, 2005 Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (SBC) filed a request for additional numbering resources with the Missouri Public Service Commission (Commission). SBC requests that the Commission review and reverse a decision of NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator), to withhold certain numbering resources to serve the needs of General Services Administration (GSA). GSA is requesting a block of 1,000 Metropolitan Calling Area numbers compatible with its Private Switched Network in the Maxville rate center. Included in this filing is the Central Office Code (NXX) Assignment Request – Part 1A (Part 1), Pooling Administrator's Response/Confirmation, Months to Exhaust Utilization Certification Worksheet, a letter from the GSA, and Code of Federal Regulations Title 47 – Telecommunication Chapter 1 – Federal Communications Commission (47- CFR).

Background

On April 28, 2005, GSA submitted a letter to SBC requesting service from SBC to replace its existing Centrex service with a new PBX system that will be installed in early July. GSA requested 1000 numbers in the 5000 series range, but stated that if these numbers were not available its preference would be for numbers starting with the digit 1, 2, 3, or 6. GSA stated that it was necessary that the numbers be a consecutive block of 1000 numbers due to compatibility with its Defense Switched Network that provides dialing to other Department of Defense sites worldwide.

On April 28, 2005, SBC submitted an application to the Pooling Administrator for a block of 1,000 consecutive telephone numbers designated for the Metropolitan Calling Area Plan in the Maxville rate center to be compatible with its Private Switched Network for the telephone number (636)-321-5000.

On April 28, 2005, the Pooling Administrator denied the request for 1,000 telephone numbers because SBC's utilization rate of 62.229 % did not meet the required utilization level of 75%.¹

The Telecommunications Department Staff (Staff) reviewed the utilization data that SBC submitted to the Pooling Administrator in the CO assignment form. SBC's utilization level of 62.229% is below the FCC 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

Missouri's Metropolitan Calling Area requires separate codes to serve both MCA and non-MCA customers. SBC does not meet the utilization rate of 75% and does not have 1,000 DID numbers in the MCA to assign to GSA. For this reason, SBC has demonstrated a verifiable need for one block of 1,000 additional numbers in the Maxville rate center. As stated above, SBC does not meet the established guidelines for the utilization rate for a block of 1,000 additional telephone numbers and requests a waiver from the Commission to serve GSA's request. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

1. Grant SBC's request for a block of 1,000 MCA numbers for the requested telephone number of (636)321-5000 to meet the needs of GSA and to be compatible with its Private Switched Network in the Maxville rate center.

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:**)

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

² Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.