

**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)
SBC Missouri, for Review and Reversal)
of the North American Numbering Plan)
Administrator's Decision to Withhold)
Numbering Resources)

Case TO-2005-0406

STAFF RECOMMENDATION

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

1. Southwestern Bell Telephone, L.P., d/b/a SBC Missouri filed an application with NeuStar, Inc., the Pooling Administrator of the North American Numbering Plan ("Pooling Administrator") to obtain a block of telephone numbers for use by the General Services Administration. The Pooling Administrator denied SBC Missouri's request because SBC Missouri's utilization rate did not meet the required utilization rate. SBC Missouri now seeks review of the Pooling Administrator's decision.

2. This Commission may overturn the Pooling Administrator's decision to withhold numbering resources from SBC Missouri if the Commission determines that SBC 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 SBC Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an Order from the Commission approving SBC Missouri's request to receive the desired NPA/NXX code in the Maxville rate center, SBC Missouri will be unable

to offer the serve the General Service Administration requires. 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 SBC Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies;
- (2) reverses the decision of the Pooling Administrator and approves SBC Missouri's request to receive a block of 1,000 MCA numbers for the requested telephone number of (636) 321-5000, or if that number is not available, then any block beginning with "1," "2," "3," or "6" in the Maxville rate center.

Respectfully submitted,

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/s/ David A. Meyer

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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 this 23rd day of May 2004.

/s/ David A. Meyer