

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held at its office in  
Jefferson City on the 29th day of  
December, 2005.

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 Numbering Plan ) **Case No. TO-2006-0247**  
Administrator's Decision to Withhold Numbering )  
Resources )

**ORDER REVERSING DECISION  
OF THE NORTH AMERICAN NUMBERING PLAN  
ADMINISTRATOR AND CLOSING CASE**

Issue Date: December 29, 2005

Effective Date: January 8, 2006

***Statement of the Case:***

On December 7, 2005, Southwestern Bell Telephone, L.P., doing business as AT&T Missouri, filed its Application seeking review and reversal of the decision of the North American Numbering Plan Administrator (NANPA), NeuStar, Inc., to withhold nine (9) blocks of 1,000 numbers that AT&T Missouri asserts it needs to provide service to the General Services Administration (GSA), an agency of the government of the United States.

The Commission issued its Order Directing Notice on December 12, 2005, setting December 19 as the deadline for intervention applications. No such applications were received. The Commission also directed its Staff to file a Memorandum and Recommendation by December 21. Staff filed its Memorandum and Recommendation on December 21.

***Discussion:***

In its Application, AT&T Missouri states that GSA requested ten (10) blocks of 1,000 Direct Inward Dial (DID) numbers on behalf of the National Geospatial-Intelligence Agency (NGA), an agency of the United States Department of Defense, which is located in St. Louis, Missouri. NGA is installing a new PBX system on February 3, 2006. GSA specifically requested consecutive numbers in the 314 NPA with an NXX code of 676. GSA advised AT&T Missouri that a block of 10,000 consecutive numbers was necessary for compatibility with the Defense Switched Network that provides dialing to other Department of Defense sites worldwide.

AT&T Missouri is unable to meet GSA's request from the numbers available in its Creve Coeur rate center. AT&T currently has the numbers 314-676-0000 through 314-676-0999 available for use. In order to secure the additional requested numbers, AT&T Missouri submitted a Thousands-Block Application Form for the 314-676-1000 through 314-676-9999 blocks. On the same day, November 17, 2005, NANPA denied AT&T Missouri's application on the grounds that AT&T had not met the standards that govern the allocation of numbering resources. According to the Central Office Code Assignment Guidelines, Section 4.3.1, carriers requesting numbering resources must demonstrate that existing codes within the rate center will exhaust within six months and meet the utilization level of 75%. AT&T Missouri's application did not meet the utilization test because its utilization calculated to only 61.899%.

A carrier may challenge a resource denial before the appropriate state regulatory commission, which may choose to reaffirm or overturn NANPA's decision.<sup>1</sup> Regulation 47 CFR 52.15(g)(4) provides in pertinent part:

Non-compliance. \* \* \* The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA's decision to the appropriate state regulatory commission. The state commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has complied with the reporting and numbering resource application requirements herein. The state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.

AT&T Missouri asserts that it has demonstrated a verifiable need for the resources at issue and that it has exhausted all other available remedies. For this reason, AT&T Missouri argues that NANPA's denial should be overturned.

In its Memorandum and Recommendation, Staff advises the Commission to grant AT&T Missouri's request on the grounds that AT&T Missouri has demonstrated a verifiable need for the resources at issue and has exhausted all other available remedies. While Staff agrees that AT&T Missouri's utilization level does not meet the 75% threshold, AT&T Missouri does not have 9,000 consecutive numbers in the Creve Coeur rate center to meet a specific request by GSA. AT&T Missouri has demonstrated a verifiable need for the additional numbering resources. For this reason, Staff recommends that the Commission reverse NANPA's denial of AT&T Missouri's numbering request and direct NANPA to release the requested resources to AT&T Missouri.

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<sup>1</sup> 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.

The Commission has reviewed AT&T Missouri's Application, the attached supporting documents and Staff's Memorandum and Recommendation. Based on this record, the Commission finds that AT&T Missouri has demonstrated a verifiable need for numbering resources and that AT&T Missouri has exhausted all other available remedies. Regulation 47 CFR 52.15(g)(4) therefore authorizes this Commission to overturn NANPA's decision to deny the requested resources.

**IT IS THEREFORE ORDERED:**

1. That the Application filed on December 7, 2005, by Southwestern Bell Telephone, L.P., doing business as AT&T Missouri, is approved.
2. That the denial by NeuStar, Inc., the North American Numbering Plan Administrator, on November 17, 2005, of the request made that day by Southwestern Bell Telephone, L.P., doing business as AT&T Missouri, is reversed. The remaining nine 1,000 blocks in the 676 prefix of the 314 NPA, specifically 314-676-1000 to 314-676-9999, shall be granted to AT&T Missouri in order for AT&T Missouri to meet the needs of the General Service Administration and to support a new PBX system in the Creve Coeur rate center. If those blocks are not available, NeuStar, Inc. (NANPA) shall grant any other suitable block of 10,000 consecutive numbers that meets the Government Services Administration's request.
3. That this order shall become effective on January 8, 2006.

4. That this case may be closed on January 9, 2006.

**BY THE COMMISSION**

A handwritten signature in black ink, appearing to read 'Colleen M. Dale', written in a cursive style.

Colleen M. Dale  
Secretary

( S E A L )

Davis, Chm., Murray, Gaw, Clayton and Appling, CC., concur

Reed, Regulatory Law Judge