

**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)
Administrator's Decision to Withhold)
Numbering Resources.)
)

Case No. TO-2007-0336

STAFF RECOMMENDATION

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

1. On March 15, 2007, Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri (AT&T) filed its Application and Motion for Expedited Treatment seeking review and reversal of the decision of the Pooling Administrator, NeuStar, Inc. to withhold certain numbering resources. AT&T asserts it needs these numbers to provide service to a customer with a new hospital facility in the 816 NPA. AT&T's customer is requesting a new block of 1,000 numbers in the Lee's Summit rate center. To meet this need, AT&T requested one block of 1,000 numbers.
2. The Pooling Administrator had denied AT&T's request on the grounds that AT&T had not met the standard set forth in 47 C.F.R. 52.15(A)(iii)(B)(h), which states that an applicant must demonstrate that 75% of the numbers assigned to it in the rate center are currently in use.
3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T if the Commission determines that AT&T has

demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(4).

4. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an order from the Commission approving AT&T's request to receive the desired block in the Lee's Summit rate center, AT&T 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 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 approves AT&T's request to receive one block of 1,000 numbers in the NPA-NXX-XXXX f 816 and any NXX assignment within the range of 2XXX through 7XXX each within the XXXX.

Respectfully submitted,

/s/ Jennifer Heintz

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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 26th day of March 2007.

/s/ Jennifer Heintz

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2007-0336
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

/s/William Voight 3-26-07
Utility Operations Division/Date

/s/Jennifer Heintz 3-26-07
General Counsel's Office/Date

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

Date: March 22, 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 Lee's Summit rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On March 15, 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 Lee's Summit rate center. zaAT&T states that it was denied the request by the Pooling Administrator because the Months to Exhaust and Utilization Worksheet did not meet the 6 months exhaust and 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 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 Lee's Summit rate center; however, it is unable to meet the customer's request for one block of one thousand consecutive telephone numbers for their direct inward dial (DID) trunks. Specifically, a block of one thousand telephone numbers in the NPA-NXX-XXXX of 816 and any NXX assignment within the range of 2XXX through 7XXX each within the XXXX. The XXXX thousands-blocks beginning with 0, 1, 8, and 9 are unacceptable because they conflict with the Lee's Summit Hospital's internal dialing plan.

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. However, AT&T does have unused telephone numbers available in the Lee's Summit rate center; however, it is unable to meet the customer's request for one block of one thousand consecutive telephone numbers for their DID trunks. Specifically AT&T requests one block of one thousand telephone numbers in the 816 NPA within the range of 2XXX through 7XXXX. For this reason, AT&T has demonstrated a

verifiable need for one block of one thousand additional numbers in the Lee's Summit 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 telephone numbers within the NPA of (816) also within the range of 2XXX through 7XXX 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:)

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OF THE STATE OF MISSOURI**

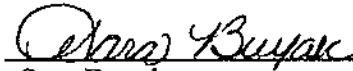
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AFFIDAVIT OF Sara Buyak

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 26th day of March 2007.
I am commissioned as a notary public within the County of Callaway,
State of Missouri and my commission expires on 9-21-10



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


Susan L. Sundermeyer