

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

In the Matter of the Application of CenturyTel	)	
of Missouri, LLC d/b/a CenturyLink for Review	)	
and Reversal of North American Number Plan	)	<b><u>Case No. TO-2010-0294</u></b>
Thousands-Block Pooling Administrator's	)	
Decision to Withhold Numbering Resources	)	

**STAFF RECOMMENDATION**

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

1. On April 26, 2010, CenturyTel of Missouri, LLC d/b/a CenturyLink filed an Application 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 Thousands-Block Pooling Administrator (Pooling Administrator), NeuStar, Inc., to withhold one one-thousand blocks of telephone numbers from CenturyLink.

2. The Pooling Administrator denied the Company's request because it did not meet the months to exhaust criteria required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from the Company if the Commission determines that the Company 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 CenturyLink has met this standard. The Staff explains that the Company needs the additional one-thousand block of additional numbers in the Branson rate center.

WHEREFORE, the Staff recommends that the Commission issue an order that:

(1) Determines CenturyLink has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2) Overturns the decision of the Pooling Administrator and grants CenturyLink's request for 1 block of one-thousand telephone numbers in the NPA/NXX of 417-266 within the XXXX range of 2000 - 2999 in the Branson rate center.

Respectfully submitted,



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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 this 28<sup>th</sup> day of April, 2010.



# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. TO-2010-0294  
Company Name: CenturyTel Of Missouri, LLC d/b/a CenturyLink (CenturyLink)

From: Sara Buyak  
Telecommunications Department

William Voight 4/28/10  
Utility Operations Division/Date

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

Date: April 27, 2010

## **Summary**

On April 26, 2010, CenturyLink filed a request to review and reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for 1 block of one-thousand telephone numbers in the Branson rate center. Specifically, the Grand Crown Resort requests 1000 consecutive telephone numbers in the NPA/NXX of 417-266 within the XXXX range of 2000-2999 to be compatible with the software for the 9-1-1 service and to accommodate the expanding facilities. Included in this filing is the Thousands-Blocks Application Form – Part 1 A (Part 1), Pooling Administrator's Response/Confirmation – Part 3 Form (Part 3), Months to Exhaust Utilization Certification Worksheet, and a letter from Grand Crown Resorts. Staff recommends approval of CenturyLink's request.

## **Background**

On March 2, 2010, CenturyLink submitted a request to NeuStar for 1 block of one-thousand telephone numbers. On March 2, 2010, the Pooling Administrator denied CenturyLink's request because CenturyLink did not meet the months to exhaust criteria.

The Telecommunications Department Staff (Staff) reviewed the CO Assignment data that CenturyLink submitted to the Pooling Administrator. CenturyLink's months to exhaust is 89 months. The months to exhaust must be 6 months or less which is required of FCC guidelines before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (h).<sup>1</sup>

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<sup>1</sup> Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

Regulation 47-CFR 52.15 states, the Pooling Administrator shall withhold numbering resources from any U.S. carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The regulation further states that the carrier may challenge the Pooling Administrator's decision to the appropriate state regulatory commission and the state commission may affirm, or may overturn, the Pooling Administrator's decision to withhold numbering resources from the carrier based on the determination that a carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available resources.

### **Recommendation**

CenturyLink's months to exhaust is 89 months which is above the required 6 months. Also, CenturyLink does not have 1 block of one-thousand consecutive telephone numbers to accommodate the needs of the Grand Crown Resort for 1000 telephone numbers. For this reason, CenturyLink has demonstrated a verifiable need for 1 block of one-thousand additional telephone numbers in the Branson rate center. Staff recommends the Commission issue an order overturning the decision of the Pooling Administrator by granting CenturyLink 1 block of one-thousand telephone numbers in the NPA/NXX of 417-266 within the XXXX range of 2000-2999, in the Branson rate center. Specifically, Staff recommends the Commission's order include a statement substantially as follows:

1. CenturyLink's request for 1 block of one-thousand telephone numbers in the NPA/NXX of 417-266 within the XXXX range of 2000 - 2999 in the Branson rate center 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: (☐ No annual report ☐ Unpaid PSC assessment.  
Amount owed: )

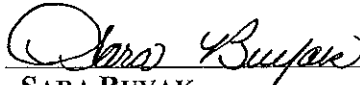
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In the Matter of the Application of )  
CenturyTel Of Missouri, LLC d/b/a ) Case No. TO-2010-0294  
CenturyLink For Review and Reversal of )  
North American Number Plan Thousands- )  
Block Pooling Administrator's Decision to )  
Withhold Numbering Resources )

**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 28<sup>th</sup> day of April 2010.

  
NOTARY PUBLIC

