

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

In the Matter of the Application of Windstream )  
Missouri, LLC for Review and Reversal of the )  
Decision of Neustar, Inc. as the Pooling )  
Administrator to Withhold Numbering Resources )

**File No. TO-2017-0029**

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its Recommendation in this matter states as follows:

1. On July 27, 2016, Windstream Missouri, LLC (“Windstream”) filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator, NeuStar, Inc., to withhold certain numbering resources from Windstream in the Albany, Missouri rate center needed to support the deployment of its Broadband Stimulus project supported by the Connect America Fund (“CAF2”). More specifically, Windstream is installing a new switch and requires a unique Location Routing Number (LRN) to identify each recipient switch or point of interface and must establish one LRN per LATA from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain a separate LRN’s for each new packet switch. Only an NXX code holder can obtain an LRN, which necessitates Windstream’s request for an NXX code. Windstream will retain only one thousand number- blocks from the new NXX code.

2. Windstream states that it does not have any NXX codes that could be moved for the purpose of establishing an LRN, nor does it have clean one- thousand

number blocks that could be intra-service provider ported to the new switches. Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the CAF2 project.

3. Windstream provided the Staff with its telephone number utilization for the Albany rate center. The Staff has examined Windstream's request and supporting documentation. In the Staff's opinion, Windstream has demonstrated a verifiable need for the additional routing and telephone numbers. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers.

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

(1) Determines Windstream 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 Windstream's request for telephone numbers in the listed rate centers, and

(3) Contains the following language:

Windstream's request for an LRN and NXX, in the Albany, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from the code and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,



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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 5<sup>th</sup> day of August, 2016.



# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. TO-2017-0029

**From:** Kari Salsman  
John VanEschen  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve Windstream Missouri's Request for Additional Numbering Resources to accommodate the deployment of a Broadband Stimulus Project.

**Date:** August 4, 2016

On July 27<sup>th</sup>, Windstream Missouri (Windstream) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny Windstream's request for additional telephone numbering resources in the Albany, Missouri telephone rate center (Application). According to Windstream, additional numbering resources are necessary to support the deployment of a Broadband Stimulus project, which is being funded with support from the Connect America Fund Phase 2 (CAF2). Windstream is installing a new packet switch and must establish a unique Location Routing Number (LRN) to identify each recipient switch or point of interface and must establish one LRN per LATA from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain an LRN for the new packet switch located in the Albany rate center. Only an NXX code holder can obtain an LRN, thus necessitating Windstream's request for an NXX code for this rate center. Windstream will retain only one single thousand-number-block from the new NXX code.

According to its Application, Windstream states that it does not have any NXX codes that could be moved for the purpose of establishing an LRN, nor does it have a clean one thousand number blocks that could be intra-service provider ported to the new switch. Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the CAF2 project.

In support of its Application, Windstream provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Windstream provided Staff highly confidential copies of its telephone number utilization for the Albany rate center. The Staff has examined Windstream's request and supporting documentation.


The Staff has examined Windstream's request and in the Staff's opinion, Windstream has demonstrated a verifiable need for the additional telephone numbers and complies with the

requirements of 4CSR240-37.040. The Commission has recently approved similar requests by Windstream to support CAF2 projects in cases IO-2016-0344 and TO-2017-0021. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers for the Broadband Stimulus project.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

Windstream's request for an LRN and NXX, in the Albany, Missouri rate center are granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from the code and return the remaining nine blocks to the Pooling Administrator.

Under penalty of perjury, I affirm that the above statement is true and correct.

  
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KARI SALSMAN