

**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)
Thousands-Block Pooling Administrator's)
Decision to Withhold Numbering Resources)

File No. TO-2020-0325

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 April 14, 2020, CenturyTel of Missouri, LLC, d/b/a CenturyLink (CenturyLink or Company) filed an application under 47 C.F.R. 52.15(g)(3)(iv), in accordance with 20 CSR 4240-28.016, requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator, Somos, to withhold certain numbering resources from CenturyLink to support the needs of National Information Solutions Cooperative in Lake St. Louis, Missouri. More specifically, National Information Solutions Cooperative is expanding and to accommodate its needs, is in need of 600 consecutive DID numbers within the 636 Numbering Plan Area (NPA). CenturyLink has no numbering resources meeting the criteria and therefore, requests the necessary DID numbers within the 636 NPA, beginning with the number three (3), in the Dardenne rate center. The Company also asked for expedited treatment in accordance with 20 CSR 4240-2.080(14).

2. CenturyLink states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied its request for the additional telephone numbers based on its failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined CenturyLink's request and supporting documentation. In Staff's opinion, CenturyLink has demonstrated a verifiable need for the additional telephone numbers and complied with 20 CSR 4240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the additional numbers.

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

(1). Determines CenturyTel of Missouri, LLC, d/b/a 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 CenturyTel of Missouri, LLC, d/b/a CenturyLink's request for telephone numbers in the designated area; and

(3) Contains the following language:

Grant CenturyTel of Missouri, LLC, d/b/a CenturyLink's request for at least 600 consecutive numbers within the 636 NPA, in the Dardenne rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyTel of Missouri, LLC, d/b/a CenturyLink's original request.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 21st day of April, 2020, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2020-0325

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve CenturyTel of Missouri d/b/a CenturyLink's Request for Additional Numbering Resources to accommodate the needs of National Information Solutions Cooperative in the Dardenne rate center.

Date: April 21, 2020

On April 14th, CenturyTel of Missouri, LLC d/b/a CenturyLink (CenturyLink) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of CenturyLink for additional telephone numbering resources in Lake St. Louis, Missouri. According to CenturyLink, National Information Solutions Cooperative (NISC) is expanding its presence in Lake St. Louis due to growth for business and is in need of 600 consecutive numbers within the 636 Numbering Plan Area (NPA), beginning with the number three, in the Dardenne rate center. CenturyLink requests one thousands-block in which these 600 numbers can be drawn.

According to its Application, CenturyLink states that it does not have the numbers available for assignment in the Dardenne rate center to meet the needs of NISC and requests the Commission to override the NANPA's denial of CenturyLink's request for the additional telephone numbers. Denial was based on CenturyLink's inability to meet the guidelines pertaining to current telephone number utilization. In other words, CenturyLink may very well have available telephone numbers to assign NISC; however, said numbers are not in sequential order, which is necessary to work with NISC's communications plan.

In support of its Application, CenturyLink provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, CenturyLink provided Staff confidential copies of its telephone number utilization for the Dardenne rate center. The Staff has examined the request of CenturyLink and supporting documentation and in the Staff's opinion, CenturyLink's application complies with the requirements of 20 CSR 4240-28.016. CenturyLink has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 636 area code is beyond 30 years. Staff recommends the Commission approve CenturyLink's request and order a reversal of the NANPA decision to deny the additional numbers for NISC.

Specifically, the Staff recommends the Commission's order include statements substantially similar to the following:

Grant CenturyLink's request for 600 consecutive numbers within the 636 NPA, beginning with 3, in the Dardenne rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyLink's original request.