

**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 Thousands-)	Case No. TO-2007-0417
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 25, 2007, Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri filed an Application and Motion for Expedited Treatment requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Pooling Administrator (NANPA), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri. The numbering resources AT&T Missouri requested consist of a single thousand-block within the 636 NPA, and in the Festus-Crystal City rate center, and further, confined to the 8000-8499 XXXX range to meet the needs of Holcim (US) Inc. The numbering resources are required in order to accommodate Holcim's new manufacturing facility in Bloomsdale, Missouri.

2. The Pooling Administrator had denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the 6 months to exhaust and 75% utilization criteria.

3. The Commission may overturn the pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that AT&T Missouri had demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(3)(iv).

4. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an order from the Commission approving AT&T Missouri's request to receive the desired block in the Festus-Crystal City rate center, AT&T Missouri 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 Missouri 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 grants AT&T Missouri's request for one block of one thousand telephone numbers within the 636 NPA, in the Festus-Crystal City rate center, and with an XXXX within the range of 8000-8499, or if the requested block is unavailable to grant it an other suitable block.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-7510 (Telephone)

(573) 751-9285 (Fax)

william.haas@psc.mo.gov

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 and to the Legal Department, NeuStar, 1800 Sutter Street, Suite 780, Concord, CA 94520, this 14th day of May 2007.

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2007-0417
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 5-3-07
Utility Operations Division/Date

/s/ William Haas 5-3-07
General Counsel's Office/Date

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

Date: May 2, 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 Festus-Crystal City rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On April 25, 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 Festus-Crystal City rate center. AT&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 B, 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 Festus-Crystal City rate center; however, it is unable to meet the customer's request for 500 sequential direct inward dial (DID) numbers. Specifically, one block of one thousand telephone numbers in the NPA of 636 and an XXXX within the range of 8000 through 8499 to meet the needs of Holcim Inc's (Holcim) request for 500 sequential DID numbers.

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. AT&T does have unused telephone numbers available in the Festus-City rate center; however, it is unable to meet the customer's request for 500 sequential DID numbers. Specifically AT&T requests one block of one thousand telephone numbers in the NPA-NXX of 636 within the range of 8000 through 8499. For this reason, AT&T has demonstrated a verifiable need for one block of one thousand additional numbers in the Festus-City 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 in the NPA of 636 and an XXXX within the range of 8000 through 8499 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:)

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

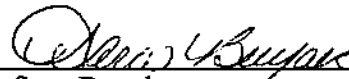
In the Matter of the Application of)
Southwestern Bell Telephone, L.P. d/b/a)
AT&T Missouri For Review and Reversal)
of North American Number Plan)
Thousands-Block Pooling Administrator's)
Decision to Withhold Numbering)
Resources)

Case No. TO-20007-0417

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 3rd day of May 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 #06942088



NOTARY PUBLIC