

# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. TO-2009-0106  
Company Name: Southwestern Bell Telephone Company d/b/a AT&T Missouri  
(AT&T)

From: Sara Buyak  
Telecommunications Department

William Voight                      9-29-08  
Utility Operations Division/Date

Denny Frey                      9-29-08  
General Counsel's Office/Date

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

Date: 9-25-08

## **Summary**

On September 19, 2008, AT&T 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 Lee's Summit rate center. Saint Luke's Health System (St. Luke) requests 400 consecutive direct inward dial (DID) telephone numbers. This memorandum recommends approval of AT&T's request. Included in this filing is the Thousand-Block Application Form (Part 1 A), a letter from St. Luke, Pooling Administrator's Response/Confirmation (Part 3), Months to Exhaust Utilization Certification Worksheet, and AT&T's Number Utilization Form (Exhibit E).

## **Background**

On September 11, 2008, AT&T submitted a request to the Pooling Administrator for 1 block of one-thousand telephone numbers. On September 11, 2008, the Pooling Administrator denied the request because AT&T did not meet the months to exhaust criteria.

The Telecommunications Department Staff (Staff) reviewed the Months to Exhaust and Utilization Certification Worksheet that AT&T submitted to the Pooling Administrator. AT&T's month's to exhaust is 61.665 months. The months to exhaust must be 6 months or less which is required by the FCC guidelines before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (6)(A)(iii).<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.

**Recommendation**

AT&T does not meet the months to exhaust requirements for additional telephone numbers as set forth in the FCC guidelines. AT&T does have in its inventory 1 block of one-thousand telephone numbers; however it is unable to meet St. Luke's requirements. St. Luke requests 400 sequential DID telephone numbers in the 816 NPA with the last digit in the NXX ending in 7 within the range of 0000, 1000, 2000, 3000 or 4000 in the Lee's Summit rate center (816-NX7-0000, 816-NX7-1000, 816-NX7-2000, 816-NX7-3000 or 816-NX7-4000).

Staff recommends the Commission issue an order overturning the decision of the Pooling Administrator by granting AT&T 1 block of one-thousand telephone numbers in the 816 NPA in the NXX ending in 7 within the range of 0000, 1000, 2000, 3000 or 4000. Specifically, Staff recommends the Commission's order include a statement substantially as follows:

1. AT&T's request for 1 block of one-thousand telephone numbers in the 816 NPA with the last digit in the NXX ending in 7 within the range of 0000, 1000, 2000, 3000 or 4000 in the Lee's Summit 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: )

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

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

Case No. TO-2009-0106


**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 25<sup>th</sup> day of September, 2008.

  
NOTARY PUBLIC

ROSEMARY R. ROBINSON  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Callaway County  
My Commission Expires: September 23, 2012  
Commission Number: 08499510