

**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)	File No. TO-2010-0349
Reversal of North American Number Plan)	
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 May 27, 2010, Southwestern Bell Telephone Company d/b/a AT&T Missouri (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 Washington rate center. Specifically, the Parker Hannifin Corporation requests 800 consecutive telephone numbers in the NPA of 636 within the XXXX range of 1000-1999, 2000-2999, 3000-3999 or 4000-4999 to be compatible with the new Direct Inward Dial and telephone system.

2. The Pooling Administrator denied the Company's request because it did not meet the months to exhaust and utilization 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 AT&T has met this standard. The Staff explains that the Company needs the additional one-thousand block of additional numbers in the Washington rate center.

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

(1) Determines that AT&T 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 AT&T's request for 1 block of one-thousand telephone numbers in the NPA of 636 within the XXXX of 1000-1999, 2000-2999, 3000-3999 or 4000-4999 in the Washington rate center.

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 3rd day of June, 2010.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2010-0349
Company Name: Southwestern Bell Telephone Company d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

Natelle Dietrich June 3, 2010
Utility Operations Division/Date

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

Date: June 2, 2010

Summary

On May 27, 2010, Southwestern Bell Telephone Company d/b/a AT&T Missouri (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 Washington rate center. Specifically, the Parker Hannifin Corporation requests 800 consecutive telephone numbers in the NPA of 636 within the XXXX range of 1000-1999, 2000-2999, 3000-3999 or 4000-4999 to be compatible with the new Direct Inward Dial and telephone system. Included in this filing is the Thousand-Block Application Form – Part 1 A (Part 1), Pooling Administrator's Response/Confirmation – Part 3 Form (Part 3), a letter from the Parker Hannifin Corporation, and AT&T's Months to Exhaust Utilization Certification Worksheet. Staff recommends the Commission approve AT&T's request.

Background

On May 25, 2010, AT&T submitted a request to NeuStar for 1 block of one-thousand telephone numbers. On May 25, 2010, the Pooling Administrator denied AT&T's request because AT&T did not meet the months to exhaust and Utilization criteria.

Parker Hannifin purchased telephone, voicemail, ACD system, and adding Direct Inward Dial for all the staff. Parker Hannifin requires 800 consecutive telephone numbers in the XXXX range of 1, 2, 3, or 4. Parker Hannifin cannot use 0, 5, 6, 7, 8 or 9 since these digits would conflict with the other facilities dialing plans.

The Telecommunications Department Staff (Staff) reviewed the CO Assignment data that AT&T submitted to the Pooling Administrator. AT&T's utilization level of 69% is below the Federal Communications Commission (FCC) guidelines of 75% which is

required before a request for additional numbering resources is permissible. AT&T's months to exhaust is 26. 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).¹

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

AT&T states that it does not meet the requirements for additional telephone numbers because its months to exhaust and utilization rate does not meet the required 6 months and the utilization rate of 75% as set forth in the FCC guidelines. Also, Parker Hannifin requires the 800 consecutive telephone numbers in the XXXX range of 1, 2, 3, and 4 for its new Direct Inward Dial, new telephones, voicemail, and ACD systems. The XXXX range cannot be in the 0, 5, 6, 7, 8, or 9 range since these digits would conflict with the other facilities dialing systems. For this reason, AT&T has demonstrated a verifiable need for 1 block of one-thousand telephone numbers in the Washington rate center.

Staff recommends the Commission approve AT&T's request for 1 block of one-thousand telephone numbers in the NPA of 636 within the XXXX of 1000-1999, 2000-2999, 3000-3999 or 4000-4999 in the Washington rate center. 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 NPA of 636 within the XXXX of 1000-1999, 2000-2999, 3000-3999 or 4000-4999 in the Washington rate center is approved.

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:)

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

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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 3rd day of June 2010.


NOTARY PUBLIC

