

**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)	File No. TO-2010-0244
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 February 2, 2011, CenturyTel of Missouri, LLC d/b/a CenturyLink ("CenturyLink") filed an Application and Motion for Expedited Treatment under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator (Pooling Administrator), NeuStar, Inc., to withhold additional telephone numbers from CenturyLink to meet its customer's request for 200 consecutive MCA telephone numbers beginning with X000.

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 CenturyTel has met this standard. The Staff explains that the Company needs the additional numbering resources for one block of one-thousand additional numbers in the O'Fallon rate center. As there are insufficient MCA numbers available, a new ten-thousand block will need to be opened, CenturyLink will designate the NXX as MCA, and return 9,000 of those numbers to the Administrator.

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

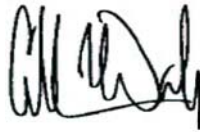
(1) Determines CenturyTel of Missouri, LLC has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2) Overturns the decision of the Pooling Administrator and grants CenturyTel's request for 1 block of one-thousand telephone numbers in the O'Fallon rate center, and

(3) Contains the following language:

CenturyLink's request for a 1K block of consecutive MCA telephone numbers beginning with NPA-NXX-1000 or similar number, in the O'Fallon, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, CenturyLink shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,



Colleen M. Dale, Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@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 this 8th day of February, 2011.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2011-0244

From: Kari Salsman
William Voight
Telecommunications Department

Subject: Staff's Recommendation to Approve CenturyLink's Request for
Additional Numbering Resources to accommodate the needs of SAK
Construction, LLC in the O'Fallon rate center.

Date: February 8, 2011

On February 2nd, 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 Administrator (NANPA) to withhold and deny CenturyLink's request for additional telephone numbering resources in the O'Fallon, Missouri telephone rate center (Application). According to CenturyLink, SAK Construction, LLC (SAK Construction), is in the process of expanding its business and moving its new headquarters to O'Fallon. SAK Construction believes the best way to implement its new Direct Inward Dial telephone system is to match the internal extension scheme and make the numbers sequential. To accommodate its internal needs, SAK Construction is in need of 200 consecutive Metro Direct Inward Dial telephone numbers beginning with NPA-NXX-1000 or similar number.

According to its Application, CenturyLink states that the requested telephone numbers are required to be a part of the Metropolitan Calling Area (MCA), which is a unique telephone numbering system in the St. Louis metropolitan area. CenturyLink states that it does not have 200 sequential MCA telephone numbers available for assignment in the O'Fallon rate center. CenturyLink requests the Commission to override the NANPA's denial of CenturyLink's request for the additional telephone numbers, which 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 the available telephone numbers to assign to SAK Construction; however, said numbers are not MCA numbers and also may not be in sequential order.

In support of its Application, CenturyLink provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, CenturyLink provided Staff highly confidential copies of its telephone number utilization for the O'Fallon rate center. The Staff has examined CenturyLink's request and supporting documentation, and the Staff has spoken at length with company officials. According to information provided by the Company, there are no MCA blocks available in the O'Fallon number pooling inventory. Consequently, a new code (10K numbers) must be opened in order for CenturyLink to assign a new MCA numbering prefix.

Case No. TO-2011-0244

Page 2 of 2

The Staff has examined CenturyLink's request and in the Staff's opinion, CenturyLink has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve CenturyLink's request and order a reversal of the NANPA decision to deny the additional numbers for SAK Construction.

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

CenturyLink's request for a 1K block of consecutive MCA telephone numbers beginning with NPA-NXX-1000 or similar number, in the O'Fallon, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, CenturyLink shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined CenturyLink's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.


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

In the Matter of the Application of)	
CenturyTel of Missouri, LLC d/b/a)	Case No. TO-2011-0244
CenturyLink, for Review and Reversal of)	
North American Number Plan Thousands-)	
Block Pooling Administrator's Decision to)	
Withhold Numbering Resources)	

AFFIDAVIT OF KARI SALSMAN

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Kari Salsman, 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.



KARI SALSMAN

Subscribed and affirmed before me this 8th day of February 2011.





NOTARY PUBLIC