

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

In the Matter of the Application of MCImetro           )  
Access Transmission Services Corp. d/b/a           )  
Verizon Access Transmission Services for           )  
Review and Reversal of North American Number   )  
Plan Thousands-Block Pooling Administrator's    )  
Decision to Withhold Numbering Resources        )

**File No. TO-2020-0099**

**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 October 4, 2019, MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon) filed an application under 47 C.F.R. § 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold certain numbering resources from Verizon to support the expanding telecommunications needs of Mercy Hospital Lincoln in Troy, Missouri. The application states Mercy Hospital Lincoln is implementing new technology that will improve provider and patient medical services by refining safe and accurate information sharing and Health Information Portability and Accountability Act (HIPAA)-compliant communications between hospital staff and departments in the Troy, Missouri area. To accommodate the implementation, Mercy Hospital Lincoln is in need of 200 consecutive numbers ending in NXX-5XXX, and within the 636 Numbering Plan Area (NPA).

2. Verizon states it could not meet the needs of the request from its current inventory or in any other manner so it submitted a request for the additional telephone

numbers to NANPA, which was denied on the grounds that Verizon had not met the utilization and/or months-to-exhaust criteria.

3. Staff has examined Verizon's request and supporting documentation. A description of Staff's investigation and recommendations is included in the Memorandum attached here as Attachment A. In Staff's opinion, Verizon 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 Verizon Access Transmission Services has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies;

(2). Overturns the decision of the Pooling Administrator and grants Verizon Access Transmission Services' request for telephone numbers in the designated area; and

(3) Contains language similar to the following:

Grant Verizon's request for 200 consecutive numbers within the 636 NPA, ending in NXX-5XXX, in the Troy rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.

Respectfully submitted,

**/s/ Jamie S. Myers**

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Attorney for the Staff of the  
Missouri Public Service Commission

**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 15th day October, 2019, to all counsel of record.

**/s/ Jamie S. Myers**

## MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. TO-2020-0099

**From:** Kari Salsman  
John VanEschen  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve MCIMetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services Request for Additional Numbering Resources to accommodate the needs of Mercy Hospital Lincoln in the Troy rate center.

**Date:** October 15, 2019

On October 4<sup>th</sup>, MCIMetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon) 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 Verizon for additional telephone numbering resources in Troy, Missouri. According to Verizon, Mercy Hospital Lincoln (Mercy) is implementing new technology that will improve provider and patient medical services by refining safe and accurate information sharing and HIPAA-compliant communications between hospital staff and departments. Mercy is in need of 200 consecutive numbers within the 636 Numbering Plan Area (NPA), ending in NXX-5XXX. Verizon requests one thousands-block in which these 200 numbers can be drawn to implement the new system.

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

In support of its Application, Verizon provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Verizon provided Staff confidential copies of its telephone number utilization for the Troy rate center. The Staff has examined the request of Verizon and supporting documentation and in the Staff's opinion, Verizon's application complies with the requirements of 20 CSR 4240-28.016. Verizon 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 Verizon's request and order a reversal of the NANPA decision to deny the additional numbers for Mercy.

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

Grant Verizon's request for 200 consecutive numbers within the 636 NPA, ending in NXX-5XXX, in the Troy rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.