

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

In the Matter of the Application of)
Southwestern Bell Telephone, L.P., for)
Review and Reversal of the North)
American Numbering Plan)
Administrator's Decision to Withhold)
Numbering Resources)

Case No. TO-2007-0185

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri filed an application with NeuStar, Inc., the Pooling Administrator of the North American Numbering Plan ("Pooling Administrator") to obtain ten blocks of telephone numbers in the 314 NPA, each having an NXX code concluding in the digit 3 or 5 for use by BJC Healthcare Systems and the Washington University Medical School. The Pooling Administrator denied AT&T Missouri's request because AT&T Missouri's utilization rate did not meet the required utilization rate. AT&T Missouri now seeks review of the Pooling Administrator's decision.

2. This Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that AT&T Missouri 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 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 NPA/NXX codes in the 314 NPA, AT&T Missouri will be unable

to offer the service BJC Healthcare Systems and Washington University Medical School require. 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;
- (2) reverses the decision of the Pooling Administrator and approves AT&T Missouri's request to receive ten pristine blocks of one thousand telephone numbers in the 314 NPA with NXX codes concluding in the digit of 3 or 5.

Respectfully submitted,

/s/ David A. Meyer

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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 20th day of November 2006.

/s/ David A. Meyer

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No.TO-2007-0185
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 11/17/06
Utility Operations Division/Date

David Meyer 11/20/06
General Counsel's Office/Date

Subject: Staff Recommendation to Approve AT&T's Request to Override a Decision by the North American Numbering Plan Administrator (NANPA)

Date: November 16, 2006

SUMMARY: AT&T Missouri (AT&T) has requested that the Commission reverse a decision by the North American Numbering Plan Administrator (NANPA), which denied AT&T's request for ten pristine blocks of one thousand telephone numbers in the St. Louis rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On November 9, 2006, AT&T filed with the Missouri Public Service Commission (Commission) a request for ten pristine blocks of one thousand telephone numbers to be assigned to the St. Louis rate center. AT&T states that it was denied the request by NANPA 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 NANPA.

AT&T states that it submitted the necessary worksheets to NANPA, and offers copies of those documents as Exhibits 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 St. Louis rate center; however, it is unable to meet the customer's request for ten pristine blocks of one thousand telephone numbers in the (314) each having an NXX code concluding in the digit 3 or 5.

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. However, AT&T does not have ten pristine blocks of one thousand telephone numbers in the St. Louis rate center having an NXX code concluding in the digit of 3 or 5. If the requested blocks are unavailable at the time of the Commission's Order, AT&T requests that it be granted any other suitable blocks that meet BJC/Washington University's request. For this reason, AT&T has demonstrated a verifiable need for ten pristine blocks of one thousand additional numbers in the St. Louis 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:

Appendix A

1. AT&T's request for ten pristine blocks of one thousand telephone numbers having an NXX code concluding in the digit of 3 or 5 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:)

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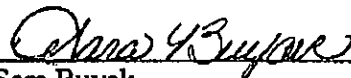
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AFFIDAVIT OF Sara Buyak

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Sara Buyak, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in the preparation of 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 17th day of November
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