

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

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

Case No. TO-2007-0468

**STAFF RECOMMENDATION**

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

1. On June 6, 2007, Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, 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 (NANPA), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri. The numbering resources AT&T Missouri requested consist of a single thousands-block within the NPA-NXX of 636-461, in the Imperial rate center, and within the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999, 9000-9999, from which one hundred (100) sequential telephone numbers can be drawn in order to meet the needs of Boemler Chevrolet in Arnold, Missouri. AT&T Missouri requested the Commission grant any other suitable numbering resources that meet Boemler's needs if the requested numbering resources are unavailable. The numbering resources are required in order to upgrade Boemler's telecommunications system and facilities to subscribe to SmartTrunk® service for its voice and data communications.

2. The Pooling Administrator denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the months to exhaust and utilization criteria set forth in the FCC guidelines.

3. The 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)(3)(iv).

4. In the attached Memorandum, 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 block in the Imperial rate center, AT&T Missouri will be unable to meet the needs of its customer. The 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; and
- (2) reverses the decision of the Pooling Administrator and grants AT&T Missouri's request for one block of one thousand MCA telephone numbers in the NPA-NXX of 636-461 within the range of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999, or 9000-9999, or if the requested blocks are unavailable to grant it any other suitable block.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the  
Missouri Public Service Commission

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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 and to the Legal Department, NeuStar, 1800 Sutter Street, Suite 780, Concord, CA 94520, this 19<sup>th</sup> day of June 2007.

/s/ William K. Haas

# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No.TO-2007-0468  
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak  
Telecommunications Department

William Voight      6-12-07  
Utility Operations Division/Date

William Haas      6-12-07  
General Counsel's Office/Date

Subject: Staff Recommendation to Approve AT&T's Request to Override a Decision by the Pooling Administrator

Date: June 12, 2007

SUMMARY: AT&T Missouri (AT&T) has requested that the Commission reverse a decision by the Pooling Administrator, which denied AT&T's request for one block of one thousand telephone numbers in the Imperial rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On June 6, 2007, AT&T filed with the Missouri Public Service Commission (Commission) a request for one block of one thousand telephone numbers to be assigned to the Imperial rate center. AT&T states that it was denied the request by the Pooling Administrator 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 the Pooling Administrator.

AT&T states that it submitted the necessary worksheets to the Pooling Administrator, and offers copies of those documents as Exhibits B, 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 Imperial rate center. AT&T is unable to meet Boemler Chevrolet's request for 100 sequential direct inward dial (DID) numbers for a PRI Smart Trunk to accommodate the upgrading of their facilities. Specifically, AT&T requests one block of one thousand telephone numbers in the NPA of 636-461 and an XXXX within the range of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999, or 9000-9999 to meet the needs of Boemler's request for 100 sequential DID numbers for the Metropolitan Calling Area (MCA).

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. AT&T does have unused telephone numbers available in the Imperial rate center; however, it is unable to meet the customer's request for 100 sequential DID numbers. Specifically AT&T requests one block of one thousand MCA telephone numbers in the NPA-NXX of 636-461 within the range of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999, or 9000-9999 in the MCA. For this reason, AT&T

has demonstrated a verifiable need for one block of one thousand additional MCA telephone numbers in the Imperial 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:

1. AT&T's request for one block of one thousand MCA telephone numbers in the NPA-NXX of 636-461 within the range of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999, or 9000-9999 is granted.

Staff is unaware of any other filing that may affect or be affected by this filing.

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☒ **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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OF THE STATE OF MISSOURI**

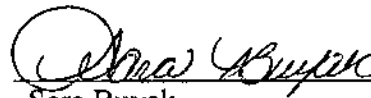
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Thousands-Block Pooling Administrator's )  
Decision to Withhold Numbering )  
Resources )

Case No. TO-2007-0468

**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 12<sup>th</sup> day of June 2007  
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 #06942086

  
NOTARY PUBLIC