

**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 Reversal of)	
North American Number Plan Thousands-)	Case No. TO-2009-0005
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. Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T") filed an application with the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. ("Pooling Administrator"), to obtain one block of 1,000 telephone numbers within the Hannibal rate center, and requested the 1,000 block in this NPA of 573-629 have an XXXX within the range of 4000-4999. The Pooling Administrator denied AT&T's request because AT&T's utilization rate did not meet the required utilization rate. AT&T 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 if the Commission determines that AT&T 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 demonstrated a verifiable need for numbering resources and has exhausted all other available remedies for a block of 1,000 telephone numbers in the Hannibal rate center. Therefore, Staff

recommends that the Commission issue an order overturning the Pooling Administrator's decision on this request.

WHEREFORE, the Staff recommends that the Commission issue an order that reverses the decision of the Pooling Administrator and approves AT&T's request for a block of 1,000 numbers in the Hannibal rate center exchange as AT&T has demonstrated a verifiable need for these numbering resources and has exhausted all other available remedies. Staff further recommends the Commission, specifically, grant AT&T's request for a block of 1,000 telephone numbers in the NPA of 573-629 and have an XXXX within the range of 4000-4999.

Respectfully submitted,

/s/ Shelley Syler Brueggemann

Shelley Syler Brueggemann

Senior Counsel

Missouri Bar No. 52173

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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 this 14th day of July 2008.

/s/ Shelley Syler Brueggemann

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2009-0005

Southwestern Bell Telephone Company d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 7-14-08
Utility Operations Division/Date

Shelley Brueggemann 7-14-08
General Counsel's Office/Date

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

Date: July 10, 2008

On July 1, 2008, 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 one block of one thousand telephone numbers in the Hannibal rate center. Included in this filing is the Thousands-Block Application Form--Part 1A (Part 1), letter from Hannibal-LaGrange College requesting 800 DID's, Pooling Administrator's Response/Confirmation - Part 3 form (Part 3), Months to Exhaust Utilization Certification Worksheet, and AT&T's number utilization (Exhibit E).

Background

Hannibal-LaGrange College is requesting 800 DID telephone numbers in the NPA-NXX of 573-629 within the range of 4000-4999. AT&T has 573-629-0XXX to assign to Hannibal-LaGrange College, however; the telephone numbers in the 573-629-0XXX will not work in the phone system since 0 is the number for the operator. Also, Hannibal-LaGrange College requests this block of telephone numbers for 911. Each room will be assigned an extension number so when a student dials 911 the location of the call will be easy to locate.

On June 5, 2008, AT&T submitted an application to the Pooling Administrator for a block of one thousand telephone numbers in the Hannibal rate center.

On June 5, 2008, the Pooling Administrator denied the request for one thousand telephone numbers because the utilization rate is 70.323 percent. According to the Central Office Code Assignment Guidelines, code holders requesting growth codes must demonstrate that existing codes within the rate center will exhaust within 6 months and meet the utilization level of 75%.¹ The Months to Exhaust and Utilization Certification Worksheet includes the previous 6-month growth history, forecast for the next 12 months, average monthly forecast, months to exhaust, utilization level, and telephone numbers available for assignment.

¹ Administrator's Response/Confirmation, remarks, DR 11, March 27, 2002.
Central Office Code (NXX) Assignment Guidelines, November 21, 2003.

The Telecommunications Department Staff (Staff) reviewed the months to exhaust forecast and utilization data that AT&T submitted to the Pooling Administrator in the Part 1A form. AT&T's utilization level is 70.323 percent. The utilization level is below the FCC guidelines of 75% which is required before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (h).²

Recommendation

Although AT&T does not meet the guidelines set forth by the FCC for additional numbering resources in the Hannibal rate center,³ at its earliest convenience, Staff recommends the Commission issue an order overturning the decision of the Pooling Administrator, and grant AT&T one block of one thousand telephone numbers in the NPA-NXX of 573-629 within the range of 4000-4999 for the Hannibal rate center. 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 telephone numbers in the NPA-NXX of 573-629 within the range of 4000-4999 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:**)

² Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

³ For example, AT&T does not meet the six months exhaust forecast and it does not meet the minimum number utilization level of seventy-five percent.

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

Case No. TO-2009-0005

AFFIDAVIT OF Sara Buyak

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

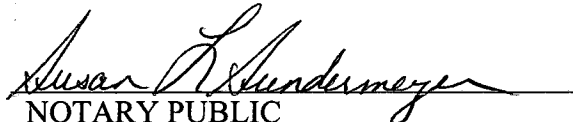
Sara Buyak, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in preparing the accompanying staff recommendation, and that the facts therein are true and correct to the best of her knowledge and belief.


SARA BUYAK

Subscribed and affirmed before me this 10th day of July 2008.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


NOTARY PUBLIC