BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of MCI) Communications Services, Inc., d/b/a) Verizon Business Services for Review and) Reversal of the North American Number) Plan Administrator's Decision to Withhold) Numbering Resources)

Case No. TO-2006-0478

STAFF RECOMMENDATION

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

1. On June 15, 2006, MCI Communications Services, Inc., d/b/a Verizon Business Services (Verizon) filed its Application seeking review and reversal of the decision of the Pooling Administrator, NeuStar, Inc. to withhold certain numbering resources. Verizon asserts it needs these numbers to provide service to a new customer in the 314 NPA. Verizon's customer is requesting two blocks of 1,000 contiguous numbers in the Ladue rate center.

2. The Pooling Administrator had denied Verizon's request on the grounds that Verizon had not met the Thousands-Block Number Pooling Administration Guidelines (Section 8.3.4), which states that applicants must demonstrate that existing numbering resources for the rate center will exhaust within six months. Verizon's failure to demonstrate that existing numbering resources will be exhausted within six months was the sole reason explicitly relied upon in the Pooling Administrator's decision. Section 8.3.4 of the guidelines also requires an applicant to demonstrate that it has met the number utilization criteria of 75% required by the FCC. The material submitted by Verizon in support of its application demonstrates that Verizon also has not met the 75% utilization criteria.

3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from Verizon if the Commission determines that Verizon has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(4).

4. In the attached Memorandum, labeled Appendix A, the Staff agrees that Verizon has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an order from the Commission approving Verizon's request to receive the desired blocks in the Ladue rate center, Verizon will be unable to meet the needs of a new 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:

- determines that Verizon 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 approves Verizon's request to receive two blocks of 1,000 DID contiguous numbers for the requested telephone numbers of (314)813 ranging between 5000/6999 in the Ladue rate center.

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Respectfully submitted,

/s/ Jennifer Heintz

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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 23rd day of June 2006.

<u>/s/ Jennifer Heintz</u>