

**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-2008-0196
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 Missouri") filed an application with NeuStar, Inc., the Pooling Administrator of the North American Numbering Plan ("Pooling Administrator") to obtain two blocks of 1,000 telephone numbers; within the 816 NPA; within the Kansas City rate center; and that each of the two 1,000 blocks have an XXXX within the range of 4000-4999, 5000-5999, or 6000-6999. 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, for two blocks of 1,000 telephone numbers in the Kansas City rate

center. Staff recommends that the Commission issue an order overturning the Pooling Administrator's decision on these requests.

WHEREFORE, the Staff recommends that the Commission issue an order that reverses the decision of the Pooling Administrator and approves AT&T Missouri's request for two blocks of 1,000 numbers in the Kansas City rate center exchange as AT&T Missouri has demonstrated a verifiable need for these numbering resources and has exhausted all other available. Staff further recommends the Commission, specifically, grant AT&T Missouri's request for two blocks of one thousand telephone numbers in the NPA of 816 and have an XXXX within the range of 4000-4999, 5000-5999, or 6000-6999.

Respectfully submitted,

/s/ Shelley Syler Brueggemann

Shelley Syler Brueggemann

Senior Counsel

Missouri Bar No. 52173

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-7393 (Telephone)

(573) 751-9285 (Fax)

shelley.brueggemann@psc.mo.gov (e-mail)

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 7th day of January 2008.

/s/ Shelley Syler Brueggemann

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2008-0196
Southwestern Bell Telephone Company d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

<u>William Voight</u>	<u>1/3/08</u>	<u>Shelley Syler Brueggemann</u>	<u>1/3/08</u>
Utility Operations Division/Date		General Counsel's Office/Date	

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

Date: January 3, 2008

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 two blocks of one thousand telephone numbers in the Kansas City rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On December 17, 2007, AT&T filed with the Missouri Public Service Commission (Commission) a request for two blocks of one thousand telephone numbers to be assigned to the Kansas City rate center. AT&T states that it was denied the request by the Pooling Administrator because the Utilization Worksheet did not meet the 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, and D 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 Kansas City rate center. However, AT&T is unable to meet Lockton Companies, LLC's (Lockton) request for two blocks of direct inward dial (DID) numbers to assign a telephone number and a direct fax number for electronic fax delivery with the last four-digits matching the phone and fax. Specifically, AT&T requests two blocks of one thousand telephone numbers in the NPA of 816 and an XXXX within the range of 4000-4999, 5000-5999, or 6000-6999 to meet the needs of Lockton's request for two blocks of sequential DID numbers.

RECOMMENDATION: AT&T does not meet requirements for additional telephone numbers because the months to exhaust and utilization worksheet does not meet the required criteria as set forth in the FCC guidelines and therefore AT&T was denied the additional telephone numbers. AT&T does have unused telephone numbers available in the Kansas City rate center; however, it is unable to meet the customer's request for two blocks of sequential DID numbers. Specifically, AT&T requests two blocks of one thousand telephone numbers in the NPA of 816 and an XXXX within the range of 4000-4999, 5000-5999, or 6000-6999. For this reason, AT&T has demonstrated a verifiable need for two blocks of one thousand

additional telephone numbers in the Kansas City 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 two blocks of one thousand telephone numbers in the NPA of 816 and an XXXX within the range of 4000-4999, 5000-5999, or 6000-6999 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:)

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

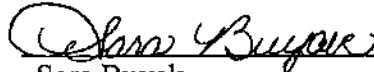
In the Matter of the Application of)
Southwestern Bell Telephone Company)
d/b/a AT&T Missouri For Review and)
Reversal of The North American Number)
Plan Thousand-s Block Pooling)
Administrator's Decision to Withhold)
Numbering Resources)

Case No. TO-2008-0196

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 3rd day of January 2008.



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


NOTARY PUBLIC