

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2009-0010

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

From: Sara Buyak
Telecommunications Department

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

Dennis Frey 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 2, 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 Ladue rate center. Included in this filing is the Thousands-Block Application Form- Part 1A (Part 1), letter from customer requesting 1,000 DID numbers, 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

On June 16, 2008, AT&T submitted an application to the Pooling Administrator for one block of one thousand telephone numbers in the Ladue rate center.

On June 16, 2008, the Pooling Administrator denied the request for one thousand telephone numbers because the utilization rate is 65.273 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.

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 65.273 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

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

² Code of Federal Regulations Title 47-Telecommunication Chapter 1 - Federal Communications Commission, Subchapter B - Common Carrier Services, Part 52 Numbering.

Recommendation

Although AT&T does not meet the guidelines set forth by the FCC for additional numbering resources in the Ladue rate center,³ currently AT&T cannot accommodate Express Scripts, Inc.'s request for one block of one thousand DID telephone numbers in the NPA-NXX of 314-684 within the range of 7000-7999 telephone numbers. For this reason, AT&T has demonstrated a verifiable need for one block of one thousand additional numbers in the Ladue rate center. Therefore, Staff recommends the Commission, at its earliest convenience, issue an order overturning the decision of the Pooling Administrator, and grant AT&T one block of one thousand DID telephone numbers in the NPA-NXX of 314-684 within the range of 7000-7999 for the Ladue rate center. Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

1. AT&T's request for one block of one thousand telephone numbers in the NPA-NXX of 314-684 within the range of 7000-7999 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: _____**

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.

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

Case No. TO-2009-0010

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