

**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)	File No. TO-2011-0050
Reversal of North American Number Plan)	
Thousands-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. On August 24, 2010, 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 2 blocks of one-thousand telephone numbers in the 816 NPA and the Liberty rate center. Specifically, the Liberty Hospital requests 2000 consecutive numbers within the Liberty rate center of the 816 NPA so as to expand and reconfigure its telephone system. Once that reconfiguration is complete, Liberty Hospital will return all of its existing DID numbers to AT&T except for 816-781-7200.

2. The Pooling Administrator denied the Company's request because it did not meet the months to exhaust and utilization criteria required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from the Company if the Commission determines that the Company 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 met this standard. The Staff explains that the Company needs the two additional one-thousand blocks of additional numbers in the Liberty rate center of the 816 NPA.

WHEREFORE, the Staff recommends that the Commission issue an order that:

(1) Determines that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2) Overturns the decision of the Pooling Administrator and grants AT&T's request for 2 consecutive blocks of one-thousand telephone numbers in the NPA of 816 within the Liberty rate center.

Respectfully submitted,



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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 7th day of September, 2010.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2011-0050

From: William Voight
Supervisor, Rates and Tariffs
Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for
Additional Numbering Resources to Accommodate the needs of Liberty
Hospital in Liberty, Missouri.

Date: September 7, 2010

On August 24th, AT&T Missouri (AT&T) filed a request for the Commission to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold AT&T's request for additional telephone numbering resources in the Liberty, Missouri telephone rate center (Application). According to AT&T, Liberty Hospital in Liberty Missouri is in the process of expansion, and needs to reconfigure its telecommunications network in such a manner that necessitates issuance of two consecutive (2) thousands-blocks of telephone numbers.

According to its Application, AT&T states that its request is a "safety valve" waiver request for Liberty Hospital. AT&T requests the Commission to override the NANPA's denial of AT&T's original request, which denial was based on AT&T's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T currently has enough unused telephone numbers to provide service to Liberty Hospital; however, the available telephone numbers are not in a sequential order, as requested by Liberty Hospital.

In support of its Application, AT&T provided copies of its initial NANPA request and subsequent denial by the NANPA. Additionally, AT&T provided Staff highly confidential copies of its telephone number utilization for the Liberty rate center. In the Staff's opinion, AT&T has demonstrated a verifiable need for the additional telephone numbers, and Staff recommends the Commission approve AT&T's request and order a reversal of the NANPA decision to deny the numbers for Liberty Hospital.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

1. AT&T's request for two (2) consecutive thousands-blocks of telephone numbers in the Liberty, Missouri rate center is granted.

Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined AT&T's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

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Case No. TO-2011-0050

AFFIDAVIT OF William Voight

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

William Voight, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Staff Recommendation, and that the facts therein are true and correct to the best of his knowledge and belief.

Bill Voight

WILLIAM VOIGHT

Subscribed and affirmed before me this

7th

day of

September 2010

Carla K. Schnieders

NOTARY PUBLIC

