

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

In the Matter of the Application of MCImetro)
Access Transmission Services Corp. d/b/a)
Verizon Access Transmission Services)
for Review and Reversal of North American)
Number Plan Thousands-Block Pooling)
Administrator's Decision to Withhold Numbering)
Resources for Nestle USA in St. Louis, Missouri)

File No. TO-2019-0294

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation in this matter states as follows:

1. On March 29, 2019, MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon or Company) filed an application under 47 C.F.R. 52.15(g)(4)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator, Somos Inc., to withhold certain numbering resources from Verizon to support the expanding telecommunications needs of Nestle USA in St. Louis. More specifically, Nestle USA is implementing strategic centralization of its facsimile services to better serve its customers in the greater St. Louis area to eliminate the need for thousands of individual analog phone lines across the country and is in need of adequate numbering resources in Missouri to support this project. To accommodate its needs, Nestle USA is in need of a 7xxx or 8xxx contiguous range of DID numbers within the 314 or 636 Numbering Plan Areas (NPA) in the St. Louis rate center.

2. Verizon states it cannot meet the requirements of its request from its current inventory or in any other manner. Verizon requests a one-thousands block of contiguous DID numbers in the 7xxx or 8xxx range in order to accommodate Nestle's

need for 1,000 numbers. NANPA denied its request for the additional telephone numbers based on Verizon's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined Verizon's request and supporting documentation. A detailed outline of its investigation and recommendations is included in Staff's Memorandum attached here as Attachment A. Staff's review of Verizon's prior telephone numbering usage indicates Verizon had blocks of one-thousand numbers that could satisfy Nestle's request, however these blocks were donated back to the telephone numbering pool. Consequently Verizon does not currently have available an unused block of one-thousand telephone numbers. In Staff's opinion, Verizon has demonstrated a verifiable need for the additional telephone numbers and complied with 4 CSR 240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the additional numbers.

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

(1). Determines Verizon Access Transmission Services 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 Verizon Access Transmission Services' request for telephone numbers in the designated area; and

(3) Contains the following language:

Grant Verizon's request for a one thousands-block within the 314 or 636 NPA, in the 7xxx or 8xxx range. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 4th day of April, 2019, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2019-0294

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services Request for Additional Numbering Resources to accommodate the needs of Nestle USA in the St. Louis rate center.

Date: April 2, 2019

On March 29th, MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of Verizon for additional telephone numbering resources in St. Louis, Missouri. According to Verizon, Nestle USA (Nestle) is centralizing its facsimile services, which will eliminate the need for thousands of individual analog phone lines across the country, and is in need of a 7xxx or 8xxx contiguous range of DID numbers within the 314 or 636 NPA to accommodate its needs.

According to its Application, Verizon states that it does not have the numbers available for assignment in the St. Louis rate center to meet the needs of Nestle and requests the Commission to override the NANPA's denial of Verizon's request for the additional telephone numbers. Denial was based on Verizon's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Verizon may very well have available telephone numbers to assign Nestle; however, said numbers are not in sequential order, which is necessary to work with Nestle's plan to centralize its facsimile services.

In support of its Application, Verizon provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Verizon provided Staff confidential copies of its telephone number utilization for the St. Louis rate center. The Staff has examined the request of Verizon and supporting documentation. Staff's review of Verizon's prior telephone numbering usage indicates Verizon had blocks of one-thousand numbers that could satisfy Nestle's request, however these blocks were donated back to the telephone numbering pool. Consequently Verizon does not currently have available an unused block of one-thousand telephone numbers.

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STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation in this matter states as follows:

1. On March 29, 2019, MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon or Company) filed an application under 47 C.F.R. 52.15(g)(4)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator, Somos Inc., to withhold certain numbering resources from Verizon to support the expanding telecommunications needs of Nestle USA in St. Louis. More specifically, Nestle USA is implementing strategic centralization of its facsimile services to better serve its customers in the greater St. Louis area to eliminate the need for thousands of individual analog phone lines across the country and is in need of adequate numbering resources in Missouri to support this project. To accommodate its needs, Nestle USA is in need of a 7xxx or 8xxx contiguous range of DID numbers within the 314 or 636 Numbering Plan Areas (NPA) in the St. Louis rate center.

2. Verizon states it cannot meet the requirements of its request from its current inventory or in any other manner. Verizon requests a one-thousands block of contiguous DID numbers in the 7xxx or 8xxx range in order to accommodate Nestle's

need for 1,000 numbers. NANPA denied its request for the additional telephone numbers based on Verizon's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined Verizon's request and supporting documentation. A detailed outline of its investigation and recommendations is included in Staff's Memorandum attached here as Attachment A. Staff's review of Verizon's prior telephone numbering usage indicates Verizon had blocks of one-thousand numbers that could satisfy Nestle's request, however these blocks were donated back to the telephone numbering pool. Consequently Verizon does not currently have available an unused block of one-thousand telephone numbers. In Staff's opinion, Verizon has demonstrated a verifiable need for the additional telephone numbers and complied with 4 CSR 240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the additional numbers.

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

(1). Determines Verizon Access Transmission Services 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 Verizon Access Transmission Services' request for telephone numbers in the designated area; and

(3) Contains the following language:

Grant Verizon's request for a one thousands-block within the 314 or 636 NPA, in the 7xxx or 8xxx range. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 4th day of April, 2019, to all counsel of record.

/s/ Whitney Payne

Staff has examined Verizon's request and in the Staff's opinion, Verizon's application complies with the requirements of 4 CSR 240-28-016. Verizon has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 314 area code is in 2025 and 636 area code forecasted exhaust date is beyond 30 years. Staff recommends the Commission approve Verizon's request and order a reversal of the NANPA decision to deny the additional numbers for Nestle.

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

Grant Verizon's request for a one thousands-block within the 314 or 636 NPA, in the 7xxx or 8xxx range. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.