

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2006-0247

Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 12/20/05

/s/ William K. Haas 12/20/05

Utility Operations Division/Date

General Counsel's Office/Date

Subject: Staff Recommendation to Approve Request to Override Decision of the North American Numbering Plan Administrator

Date: December 20, 2005

On December 7, 2005 Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri (AT&T) filed a request for additional numbering resources with the Missouri Public Service Commission (Commission). AT&T requests that the Commission review and reverse a decision of NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator), to withhold certain numbering resources requested by the General Services Administration. The General Services Administration is requesting 10,000 consecutive DID telephone numbers in the Creve Coeur rate center to meet the needs of the Geospatial-Intelligence Agency, another government agency. Included in this filing is the Central Office Code (NXX) Assignment Request – Part 1A (Part 1), Pooling Administrator's Response/Confirmation, Months to Exhaust Utilization Certification Worksheet, a letter from General Services Administration, State of Missouri Certificate of Corporate Records, and Registration of Fictitious Name.

Background

On November 15, 2005, the General Services Administration submitted a letter to AT&T requesting service from AT&T.. The General Services Administration requested 10,000 consecutive DID telephone numbers, in the 314 NPA with an NXX code of 676, to support a new PBX system. The General Services Administration stated that it is necessary that the numbers be a consecutive block of 10,000 numbers (i.e., an entire prefix) for compatibility with the Defense Switched Network that provides dialing to other Department of Defense sites worldwide.

On November 17, 2005, AT&T submitted an application to the Pooling Administrator for 9,000 consecutive telephone numbers in the Creve Coeur rate center. AT&T has one block of 1,000 telephone number in the 314 NPA with an NXX code of 676.

On or about November 17, 2005, the Pooling Administrator denied the request for 9,000 consecutive telephone numbers because AT&T's utilization rate of 61.899 % did not meet the required utilization level of 75%.¹

The Telecommunications Department Staff (Staff) reviewed the utilization data that AT&T submitted to the Pooling Administrator in the CO assignment form. AT&T's utilization level of 61.899% 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

Recommendation

AT&T does not have 9,000 consecutive numbers in the Creve Coeur rate center to meet a specific request of the General Services Administration. Although AT&T does not meet the required utilization rate of 75%, AT&T has demonstrated a verifiable need for 9,000 consecutive numbers in the Creve Coeur rate center. Staff recommends the Commission reverse the decision by Neustar to withhold the numbering resources to serve General Services Administration's request. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

1. Grant AT&T's request for the remaining nine 1,000 number blocks in the 676 prefix of the 314 NPA if available, to meet the needs of the General Services Administration and to support a new PBX system in the Creve Coeur rate center, or if those blocks are not available, to grant it any other suitable block of 10,000 consecutive numbers that meets the Government Services Administration's request.

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:**)

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 I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.