

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

In the Matter of the Application of Southwestern )	
Bell Telephone, L.P., d/b/a AT&T Missouri, for )	
Review and Reversal of North American )	Case No. TO-2006-0247
Numbering Plan 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. The General Services Administration (GSA), a federal government agency, is purchasing services from Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri. The GSA requested 10,000 consecutive telephone numbers in the Creve Coeur rate center to meet the needs of the National Geospatial-Intelligence Agency. The GSA requested that the numbers be in the 314 NPA with an NXX code of 676, if possible.

2. AT&T Missouri has one 1000-number block in the 676 prefix of the 314 NPA. AT&T Missouri filed an application with NeuStar, the Pooling Administrator of the North American Numbering Plan, requesting the remaining nine 1000-number blocks in the 676 prefix. The Pooling Administrator denied AT&T Missouri's request because AT&T Missouri had not met the utilization criteria of 75%.

3. The 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).

4. 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. Without an order from the Commission approving AT&T Missouri's request to receive the desired blocks in the Creve Coeur rate center, SBC Missouri will be unable to serve the needs of its customer GSA. The Staff recommends that the Commission issue an order overturning the Pooling Administrator's decision.

**WHEREFORE**, the Staff recommends that the Commission, at its earliest convenience, issue an order that:

- (1) determines that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2) reverses the decision of the Pooling Administrator and approves SBC Missouri's request to receive the remaining nine 1000-number blocks in the 676 prefix of the 314 NPA, or if those nine blocks are not available, to release 10 consecutive 1,000 number blocks constituting an entire prefix in the Creve Coeur rate center in order to meet the GSA's request.

Respectfully submitted,

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/s/ William K. Haas

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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 21<sup>st</sup> day of December 2005.

/s/ William K. Haas