

**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 the North American Numbering Plan )  
Administrator's Decision to Withhold )  
Numbering Resources )

Case TO-2006-0335

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its recommendation states:

1. Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri filed an application with NeuStar, Inc., the Pooling Administrator of the North American Numbering Plan ("Pooling Administrator") to obtain a block of telephone numbers for use by the Department of the Treasury, Internal Revenue Service ("IRS"), a customer of AT&T Missouri in the Kansas City area that is consolidating eight existing locations in the Kansas City metropolitan area into one new complex. The Pooling Administrator denied AT&T Missouri's request because AT&T Missouri's utilization rate did not meet the required utilization rate. AT&T Missouri now seeks review of the Pooling Administrator's decision.

2. This 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).

3. 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 NPA/NXX codes in the Kansas City rate center, AT&T Missouri will be unable to offer the service the IRS requires to support its IP PBX system. 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;
- (2) reverses the decision of the Pooling Administrator and approves AT&T Missouri's request to receive a block of 6,000 Direct Inward Dial ("DID") contiguous numbers and, if possible have the NXX of these numbers end in 0, 1, 2, 4, 5, or 7 (or conversely, *not* have the NXX of the numbers end in 3, 6, 8, or 9); and
- (3) directs AT&T Missouri to return any unused telephone numbers to the Pooling Administrator.

Respectfully submitted,

**/s/ David A. Meyer**

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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 6th day of March 2006.

**/s/ David A. Meyer**\_\_\_\_\_