

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2006-0335

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

From: Sara Buyak
Telecommunications Department

William Voight 3-6-06

David Meyer 3-6-06

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: March 6, 2006

On February 23, 2006 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 to serve the needs of the Department of the Treasury, Internal Revenue Service (IRS). The IRS is requesting six blocks of 1,000 Direct Inward Dial (DID) contiguous numbers in the Kansas City rate center to support a new IP PBX system. AT&T included in its filing a copy of the Central Office Code (NXX) Assignment Request – Part 1A (Part 1), Pooling Administrator's Response/Confirmation, Months to Exhaust Utilization Certification Worksheet, and a letter from the IRS.

Background

On February 10, 2006, the IRS submitted a letter to AT&T requesting service from AT&T to provide a six blocks of 1,000 DID contiguous numbers that the NXX will end in 0, 1, 2, 4, 5, or 7.

On February 13, 2006, AT&T submitted an application to the Pooling Administrator for six blocks of 1,000 numbers in the Kansas City rate center.

On or about February 13, 2006, the Pooling Administrator denied the request for six blocks of 1,000 telephone numbers because AT&T's utilization rate of 62.701% 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. SBC's utilization level

¹ Administrator's Response/Confirmation, remarks, DR 11, March 27, 2002.
Central Office Code (NXX) Assignment Guidelines, November 21, 2003.

of 62.701% 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 six blocks of 1,000 DID contiguous numbers in the Kansas City rate center to meet a specific request of the IRS. Although AT&T does not meet the required utilization rate of 75%, AT&T has demonstrated a verifiable need for six blocks of 1,000 additional numbers in the Kansas City rate center. Staff recommends the Commission reverse the decision by Neustar to withhold the numbering resources to serve AT&T's request. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

1. Grant AT&T's request for six blocks of 1,000 DID contiguous numbers for the requested telephone number of (816) and that the NXX of these numbers end in 0, 1, 2, 4, 5, or 7 in the Kansas City rate center.
2. Request AT&T to return any unused telephone numbers to the Pooling Administrator.

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: _____**

² Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

**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 Number Plan
Administrator's Decision to Withhold
Numbering Resources

Case No. **TO-2006-0335**

AFFIDAVIT OF Sara Buyak

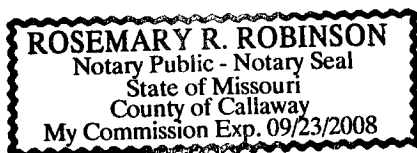
STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

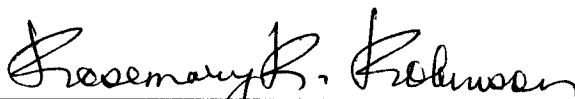
Sara Buyak, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in the preparation of the accompanying staff recommendation, and that the facts therein are true and correct to the best of her knowledge and belief.



Sara Buyak

Subscribed and affirmed before me this 2nd day of March, 2006
I am commissioned as a notary public within the County of Cole, State of Missouri
and my commission expires on 9-23-2008





NOTARY PUBLIC