

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Socket	)	
Telecom, LLC For Review and Reversal	)	
Of North American Number Plan	)	
Administrator's Decision to Withhold	)	Case No. TO-2007-0264
Numbering Resources and Motion for	)	
Expedited Treatment	)	

**SOCKET TELECOM, LLC's SUPPLEMENT TO APPLICATION AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW Socket Telecom, LLC ("Socket") and files this supplement to its verified Application and Motion for Expedited Treatment filed on January 12, 2007. In that Application, Socket requests the Missouri Public Service Commission ("Commission") to issue an expedited order that reviews and reverses the recent denial by NeuStar, Inc. ("NeuStar", "Pooling Administrator" or "PA") of Socket's Application for blocks of telephone numbers. In addition, Socket specifically requests that the Commission direct the PA to immediately release the requested blocks of telephone numbers to Socket.

On January 18, 2007, the Staff of the Missouri Public Service Commission filed a Response to Motion for Expedited Treatment. In that Response, Staff notes that it has requested that Socket amend its application. Staff's request centered around confusion on whether certain NPA-NXX codes were designated as MCA or non-MCA codes in the Pond exchange.

When attempting to obtain numbering resources that are the subject of this Application, Socket used the Local Exchange Routing Guide (LERG) to determine whether NPA-NXX codes

were designated as either MCA or non-MCA codes as required by the Commission¹. Socket was seeking both an MCA and a non-MCA code for the Pond exchange. Socket obtained the 636-422-7 thousand-block, which was designated in the LERG as an MCA code. Socket determined that there were no thousand-blocks of non-MCA codes available for the Pond exchange. For that reason, Socket requested that an entire new code of ten thousand numbers be opened with the intent of designating that code as non-MCA, using a thousand-block of numbers from that code, and donating the remaining blocks back. That request was denied by the PA on the grounds that there were sufficient numbering resources without the need to open a new NPA-NXX code.

On January 16, 2007, Socket was contacted by the Telecommunications Department of the Staff of the Public Service Commission questioning whether the 636-422-7 thousand-block for the Pond exchange was properly identified as a MCA code in Socket's Application. According to the LERG, that thousand-block was identified as a MCA code. However, other publicly available data (<http://www.localcallingguide.com>) and the data used by the Staff of the Public Service Commission suggested that this code was not designated as an MCA code. Given this inconsistency and the desire not to have confusion about whether the code was an MCA code or not, Socket applied for another thousand-block for the Pond exchange that was identified both in the LERG and other sources as being an MCA designated code. That code is 636-405-9. Socket has received confirmation from the PA that code has been assigned to Socket with an effective date in the LERG of February 18, 2007. As Socket had already been assigned the 636-422-7 thousand-block, Socket will donate those numbers back to the PA. With these changes, Socket's original request regarding numbering resources for the Pond exchange remains unchanged. Socket still

¹ Case No. TO-99-483, *Investigation for the purpose of clarifying and determining certain aspects surrounding the provisioning of Metropolitan Calling Area (MCA) service after implementation of the Telecommunications Act of 1996*, Report and Order, 9/7/00, <http://www.psc.mo.gov/orders/2000/09079483.htm>

requests the Commission grant an override to the PA's original denial of Socket's request to open a new NPA-NXX code. This is necessary, as according to the LERG, there are no non-MCA thousand blocks available. In order for Socket to have non-MCA numbering resources available that are consistent with the LERG, Socket must be able to open a new NPA-NXX code and designate that code as non-MCA code.

Staff's second area of concern indirectly referenced in its Response to Motion for Expedited Treatment involved the Sparta exchange. At the time Socket sought numbering resources for this exchange, there were none available. For that reason, Socket requested that the PA open a new NPA-NXX code. That request was granted and Socket designated the full NPA-NXX code as an MCA-Code in the LERG and acquired a thousand-block of numbers. The NPA-NXX code was 417-441 with Socket taking the 417-441-1 thousand block. In order to have non-MCA numbering resources, Socket also requested that the PA open a second full NPA-NXX code. That request was denied on the grounds that there were existing thousand-blocks available. For that reason, Socket requested that the Commission grant an override to the PA's decision regarding that second NPA-NXX code.

After Socket filed its Application, Staff contacted Socket seeking an explanation of why Socket could not use another thousand block with the 417-441 block. After explaining that MCA codes must be designated at the full code level rather than the thousand-block and that Socket had designated the 417-441 code as an MCA code, it was Socket's understanding that there are no outstanding Staff's concerns with respect to the Sparta exchange.

WHEREFORE, based on the Application and this Supplement Socket respectfully requests the Commission to expedite its review and issue its orders in this case as soon as possible

overturning NANPA's previous determination denying Socket access to additional numbering resources, and instruct NANPA to release the numbering resources necessary to satisfy the requests submitted by Socket.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

Carl J. Lumley

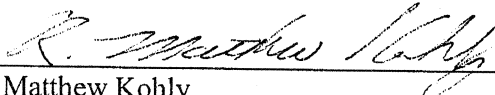
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STATE OF MISSOURI)
)
COUNTY OF BOONE) SS.

VERIFICATION

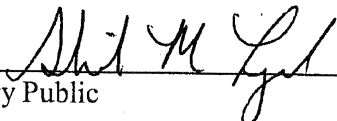
I, R. MATTHEW, KOHLY, first being duly sworn, state on my oath that I am over the age of twenty-one years, sound of mind, and an employee of Socket Telecom, LLC. I am authorized to act on behalf of Socket Telecom, LLC, regarding the foregoing document. I have read the foregoing ~~Supplement~~ and I am informed and believe that the matters contained therein are true. Further, I hereby confirm that Carl J. Lumley, Leland B. Curtis, and Curtis, Heinz, Garrett & O'Keefe, P.C., 130 S. Bemiston, Suite 200, Clayton, Missouri 63105, are authorized to sign all pleadings and documents necessary to obtain the decision of the Missouri Public Service Commission on the foregoing ~~Supplement~~ and to represent Socket Telecom, LLC in this proceeding.



R. Matthew Kohly

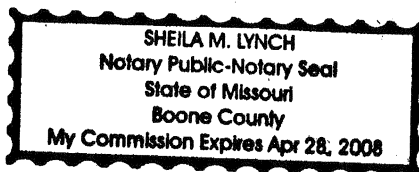
On this 22nd day of January, 2007, before me, a Notary Public, personally appeared R. Matthew Kohly, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and an employee of Socket Telecom, LLC, he signed the foregoing document as an employee of Socket Telecom, LLC, and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.



Notary Public

My Commission Expires:



CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was e-mailed this 22nd day of January, 2007:

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Carl J. Lumley