

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

In the matter of the Application of	)	
CenturyTel of Missouri, LLC	)	
For Review and Reversal of North American	)	
Number Plan Administrator's Decision To	)	Case No. _____
Withhold Numbering Resources for the	)	
Foley, Holstein and Wright City, Missouri	)	
Rate Centers.	)	

**APPLICATION  
OF  
CENTURYTEL OF MISSOURI, LLC**

COMES NOW CenturyTel of Missouri, LLC ("CenturyTel") and files this verified application, pursuant to 4 CSR 240-2.060 and 47 C.F.R 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an order that reviews and reverses the recent decision of the North American Numbering Plan Administrator, NeuStar, Inc., ("NANPA") to withhold certain numbering resources from CenturyTel in the form of one new NXX code with one block of 1,000 numbers for each of the following CenturyTel rate centers necessary for implementation of the new Tier 6 of the St. Louis Metropolitan Calling Area (MCA) Plan<sup>1</sup>: Foley, Holstein and Wright City, Missouri. Whereas customers subscribing to the new Tier 6 MCA service within CenturyTel's five exchanges constituting the new tier will need to change their telephone number to an MCA-designated telephone number, CenturyTel requires at least one new NXX code with one block of 1,000 numbers in the Foley, Holstein and Wright City rate centers to service the future needs of customers requiring MCA numbers. In support of its Application, CenturyTel states as follows:

1. CenturyTel is a Louisiana limited liability corporation that is duly authorized to do business in the state of Missouri. Copies of CenturyTel's Certificate of Authority to transact

---

<sup>1</sup> Order Approving Stipulation and Agreement and Order Directing Filing, May 18, 2006, Case No. TO-2005-0141; Order Directing Filing of Staff Recommendation, June 27, 2006, Case No. TO-2005-0141, Tariff No. YI-2006-0946.

business in Missouri from the Missouri Secretary of State were filed in Case No. TM-2002-232, and are incorporated herein by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G). CenturyTel's principle place of business in Missouri is 1151 CenturyTel Drive, Wentzville, Missouri 63885. CenturyTel is a "telecommunications company" and a "public utility" as those terms are defined in §386.020, RSMo 2000, and, thus, is subject to the jurisdiction, supervision and control of this Commission.

2. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

Larry W. Dority  
FISCHER & DORITY, P.C.  
101 Madison, Suite 400  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383  
E-mail: [lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)

3. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Foley, Holstein and Wright City exchanges.

4. Accordingly, on or about October 3, 2006, CenturyTel submitted its requests to the Pooling Administrator requesting a new NXX code with one block of 1,000 numbers for each of the above-named rate centers of Foley, Holstein and Wright City, and submitted the necessary Months to Exhaust and Utilization Certification Worksheets. Copies of the Worksheets submitted for the Foley, Holstein and Wright City rate centers are attached hereto, and incorporated herein by reference, as **Exhibits A, B and C**, respectively.

5. The Pooling Administrator denied the requests on the grounds that, pursuant to CenturyTel's Months to Exhaust and Utilization Worksheets, CenturyTel did not demonstrate

that the individual exchanges met the FCC's utilization requirement of 75.00 percent, as reflected on the last page of the attached Exhibits.

6. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000 Order in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and the state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources. (Report and Order and Further Notice of Proposed Rule Making, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; see also 47 C.F.R. 52.15(g)(3)(iv), attached hereto and marked as **Exhibit D**). Thus, the Missouri Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein." Id.

7. CenturyTel seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission previously overturned NANPA's decisions to withhold numbering resources to CenturyTel for its Dardenne, Missouri Rate Center in its Order Granting Additional Numbering Resources, issued in Case No. IO-2006-0428, June 1, 2006 and Case No. IO-2005-0178, January 11, 2005. See also, Order Granting Additional Numbering Resources, Case No. IO-2006-0195, December 19, 2005; Order Granting Additional Numbering Resources, Case No. IO-2005-0179, January 27, 2005; Order Granting Additional Numbering Resources, In the Matter of the Application of GTE Midwest Incorporated d/b/a Verizon Midwest For Review and Reversal of North American Number Plan Administrator's Decision To Withhold Numbering Resources, Case No. TO-2002-481, June 20, 2002; Order Granting

Additional Numbering Resources, In the Matter of the Application of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri for Review and Reversal of North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. IO-2003-0318, April 1, 2003.

8. CenturyTel does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

9. CenturyTel does not have any annual report or assessment fees that are overdue in Missouri.

WHEREFORE, CenturyTel respectfully requests that the Commission overturn NANPA's previous determinations in this matter, and instruct NANPA to release the numbering resources necessary to meet the needs of CenturyTel's customers as set forth herein.

Respectfully submitted,

/s/ Larry W. Dority

Larry W. Dority

Mo. Bar 25617

FISCHER & DORITY, P.C.

101 Madison, Suite 400

Jefferson City, MO 65101

Tel: (573) 636-6758

Fax: (573) 636-0383

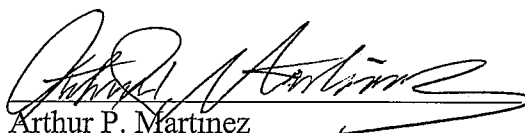
Email: lwdority@sprintmail.com

Attorneys for CenturyTel of Missouri, LLC

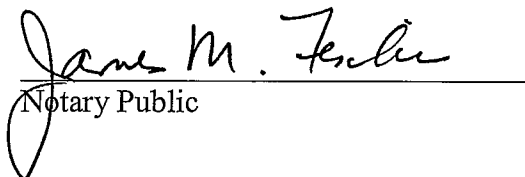
VERIFICATION

STATE OF MISSOURI           )  
  ) SS  
COUNTY OF COLE            )

I, Arthur P. Martinez, of lawful age, being first duly sworn upon my oath, state that I am the Director Government Relations of CenturyTel and that I am authorized to execute this Application on behalf of CenturyTel of Missouri, LLC; and that the facts set forth in the foregoing Application are true to the best of my knowledge, information and belief.

  
Arthur P. Martinez

Subscribed and sworn to before me this 17<sup>th</sup> day of October, 2006.

  
Notary Public

My Commission expires:

October 6, 2007



JAMES M. FISCHER  
Cole County  
My Commission Expires  
October 6, 2007

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, emailed or mailed this 18<sup>th</sup> day of October, 2006, to:

Mr. Michael Dandino  
Deputy Public Counsel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Mr. Kevin Thompson  
General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

/s/ Larry W. Dority

---

Larry W. Dority