

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

In the Matter of the Application of Teleport                     )  
Communications America, LLC for Review                     )  
And Reversal of North American Number Plan                     )  
Thousands-Block Pooling Administrator's                     )  
Decision to Withhold Numbering Resources                     )

**File No. TO-2020-0014**

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation in this matter states as follows:

1. On July 24, 2019, Teleport Communication American, LLC, an affiliate of AT&T Corp., (Teleport) filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator, Somos (NANPA), to withhold certain numbering resources from Teleport to support the integration of telecommunications needs of Saint Luke's Health System at its Primary Care facility in Clinton, Missouri. More specifically, Teleport requested 100 DID numbers in the format 660-XX4-72XX in order to integrate into the existing network in the Kansas City Metro area.

2. Teleport states it has researched the available number resources in the Clinton rate center and determined into cannot meet the customer's needs. NANPA denied its request for the telephone numbers based on Teleport's failure to meet the months-to-exhaust criteria or utilization thresholds.

3. Staff has examined Teleport's request and supporting documentation. A detailed outline of its investigation and recommendations is included in Staff's Memorandum attached here as Attachment A. In Staff's opinion, Teleport has demonstrated a verifiable need for the additional telephone numbers and has complied

with 4 CSR 240-28.016. Staff recommends the Commission approve the request and order a reversal of the NANPA decision to deny the numbers.

**WHEREFORE**, Staff recommends that the Commission issue an order that:

- (1). Determines Teleport has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2). Overturns the decision of NANPA and grants Teleport's request for telephone numbers in the designated area; and
- (3) Contains the following language:

Grant Teleport's request for one thousands-block within the 660 NPA, in 660-XX4-72XX format, in the Clinton rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.

Respectfully submitted,

**/s/ Alexandra L. Klaus**

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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 parties and/or counsel of record on this 23<sup>rd</sup> day of August, 2019.

**/s/ Alexandra L. Klaus**

## MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. TO-2020-0014

**From:** Kari Salsman, Utility Policy Analyst I  
John VanEschen, Utility Regulatory Manager  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve Teleport Communications America, LLC's Request for Additional Numbering Resources to accommodate the needs of Saint Luke's Health System in the Clinton rate center.

**Date:** August 23, 2019

On July 24<sup>th</sup>, Teleport Communications America, LLC (Teleport) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of Teleport for additional telephone numbering resources in the Clinton, Missouri telephone rate center (Application). According to Teleport, Saint Luke's Health System (St. Luke's) is expanding its voice network at its Clinton location. With this expansion, St. Luke's is in need of 100 consecutive numbers that will work with their internal dial plan and be consistent with St. Luke's larger voice network serving its Kansas City metro area. Specifically, St. Luke's is in need of 100 consecutive numbers, within the 660 NPA, in the Clinton rate center, in 660-XX4-72XX format. Teleport requests one thousands-block in which these 100 numbers can be drawn.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Clinton rate center to meet the needs of St. Luke's and requests the Commission to override the NANPA's denial of Teleport's request for the additional telephone numbers. Denial was based on Teleport's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Teleport may very well have available telephone numbers to assign St. Luke's; however, said numbers are not in 660-XX4-72XX format, which is necessary to work with St. Luke's internal dial plan.

In support of its Application, Teleport provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Teleport provided Staff a confidential copy of its telephone number utilization for the Clinton rate center.

Staff has examined Teleport's request and supporting documentation, and in Staff's opinion, Teleport's application complies with the requirements of 4 CSR 240-28.016. Teleport has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 660 area code is beyond 30 years. Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for St. Luke's.

Specifically, Staff recommends the Commission's order include a statement substantially as follows:

Grant Teleport's request for one thousands-block within the 660 NPA, in 660-XX4-72XX format, in the Clinton rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.