

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

In the Matter of the Application of MCImetro)
Access Transmission Services LLC. d/b/a)
Verizon Access Transmission Services for)
Review and Reversal of North American Number)
Plan Thousands-Block Pooling Administrator's)
Decision to Withhold Numbering Resources)

File No. TO-2020-0040

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 August 15, 2019, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon or Company) 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, to withhold certain numbering resources from Verizon to support the expanding telecommunications needs of Mercy Hospital Jefferson in Festus, Missouri. More specifically, Mercy Hospital Jefferson is implementing new technology that will improve provider and patient medical services by refining safe and accurate information sharing and Health Information Portability and Accountability Act (HIPAA)-compliant communications between hospital staff and departments in the Festus Missouri area. To accommodate its needs, Mercy Hospital Jefferson is in need of 2,000 contiguous DID numbers, ending in an NXX of 7, and within the 636 Numbering Plan Area (NPA). Verizon has no numbering resources meeting the criteria and therefore, requests 2 contiguous one-thousands blocks of DID numbers within the 636 NPA.

2. Verizon states it cannot meet the requirements of its request from its current inventory or in any other manner. NANPA denied its request for the additional telephone numbers based on Verizon's failure to meet the months-to-exhaust criteria and/or its inability to meet the guidelines pertaining to current telephone number utilization.

3. Staff has examined Verizon'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, Verizon has demonstrated a verifiable need for the additional telephone numbers and 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 additional numbers.

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

(1). Determines Verizon Access Transmission Services has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and

(2). Overturns the decision of the Pooling Administrator and grants Verizon Access Transmission Services' request for telephone numbers in the designated area; and

(3) Contains the following language:

Grant Verizon's request for two thousands-block within the 636 NPA, in the FSSCRSTLCY rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.

Respectfully submitted,

/s/ Ron Irving

Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 23rd day August, 2019, to all counsel of record.

/s/ Ron Irving

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2020-0040

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

Subject: Staff's Recommendation to Approve MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services Request for Additional Numbering Resources to accommodate the needs of Mercy Hospital Jefferson in the Festus rate center.

Date: August 23, 2019

On August 15th, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon) 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 Verizon for additional telephone numbering resources in the Festus telephone rate center (Application). According to Verizon, Mercy Hospital Jefferson (Mercy) is implementing new technology that will improve provider and patient medical services by refining safe and accurate information sharing and Health Information Portability and Accountability Act (HIPAA)-compliant communications between hospital staff and departments. With this implementation, Mercy is in need of 2,000 consecutive numbers. Specifically, Mercy is in need of 2,000 consecutive numbers within the 636 NPA, ending in an NXX of 7, in the Festus rate center. Verizon requests 2 contiguous one thousands-blocks to meet this need.

According to its Application, Verizon states that it does not have the numbers available for assignment in the Festus rate center to meet the needs of Mercy and requests the Commission to override the NANPA's denial of Verizon's request for the additional telephone numbers. Denial was based on Verizon's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Verizon may very well have available telephone numbers to assign Mercy; however, said numbers are not in sequential order, which is necessary to work with Mercy's communications plan.

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

Staff has examined Verizon's request and supporting documentation, and in Staff's opinion, Verizon's application complies with the requirements of 4 CSR 240-28.016. Verizon has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 636 area code is beyond 30 years.

Staff recommends the Commission approve Verizon's request and order a reversal of the NANPA decision to deny the additional numbers for Mercy.

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

Grant Verizon's request for two thousands-block within the 636 NPA, ending in an NXX of 7, in the FSSCRSTLCY rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Verizon's original request.