

**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 Thousands-Block        | ) | <b>File No. TO-2010-0079</b> |
| Pooling Administrator's Decision to Withhold      | ) |                              |
| Numbering Resources                               | ) |                              |

**STAFF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On September 4, 2009, CenturyTel of Missouri, LLC filed an Application and Motion for Expedited Treatment under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator (Pooling Administrator), NeuStar, Inc., to withhold two consecutive one-thousand blocks of telephone numbers from CenturyTel.

2. The Pooling Administrator denied the Company's request because it did not meet the months to exhaust and 75% utilization criteria required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from the Company if the Commission determines that the Company has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. 52.15 (g)(4).

3. In the attached Memorandum, labeled Appendix A, the Staff agrees that CenturyTel has met this standard. The Staff explains that the Company needs the additional numbering resources for two blocks of one-thousand additional numbers in the O'Fallon rate center.

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

(1) Determines CenturyTel of Missouri, LLC 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 CenturyTel's request for 2 consecutive blocks of one-thousand telephone numbers in the 636-542

NPA/NXX within the XXXX range of 5000 to 6999 or 6000-7999 in the O'Fallon rate center.

Respectfully submitted,



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Attorney for the Staff of the  
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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 counsel of record this 15<sup>th</sup> day of September, 2009.



# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. TO-2010-0079  
Company Name: CenturyTel of Missouri, LLC (CenturyTel)

From: Sara Buyak  
Telecommunications Department

William Voight 9/10/09  
Utility Operations Division/Date

Subject: Staff Recommendation to Approve a Request to Override a Decision of the North American Numbering Plan Administrator

Date: September 9, 2009

## **Summary**

On September 4, 2009, CenturyTel filed a request to review and reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for 2 consecutive blocks of one-thousand telephone numbers in the O'Fallon rate center. Specifically, Fort Zumwalt School District (Zumwalt) requests 2 consecutive blocks of a thousand telephone numbers in the 636-542 NPA/NXX within the ranges of 5000 to 6999 or 6000 to 7999 to be compatible with the new Direct Inward Dialing (DID) system. Included in this filing is the Thousands-Blocks Application Form – Part 1 A (Part 1), a letter from Zumwalt, Pooling Administrator's Response/Confirmation – Part 3 Form (Part 3), Months to Exhaust Utilization Certification Worksheet, and CenturyTel's Number Utilization Form. Staff recommends approval of CenturyTel's request.

## **Background**

On June 25, 2009, CenturyTel submitted a request to NeuStar for 2 blocks of one-thousand telephone numbers. On June 25, 2009, the Pooling Administrator denied CenturyTel's request because CenturyTel did not meet the months to exhaust and Utilization criteria. Zumwalt stated the request for 2 consecutive blocks of one-thousand direct inward dial (DID) telephone numbers is required for the new switch and to simplify the dialing plan.

The Telecommunications Department Staff (Staff) reviewed the CO Assignment data that CenturyTel submitted to the Pooling Administrator. CenturyTel's utilization level of 70.283% is below the Federal Communications Commission (FCC) guidelines of 75% which is required before a request for additional numbering resources is permissible. CenturyTel's months to exhaust is 56.166 and 59.166. The months to exhaust must be 6

months or less which is required of FCC guidelines before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (h).<sup>1</sup>

Regulation 47-CFR 52.15 states, the Pooling Administrator shall withhold numbering resources from any carrier that fails to comply with the reporting and numbering resource application requirements established in this part. The regulation further states that the carrier may challenge the Pooling Administrator's decision to the appropriate state regulatory commission and the state commission may affirm, or may overturn, the Pooling Administrator's decision to withhold numbering resources from the carrier based on the determination that a carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available resources.

### **Recommendation**

CenturyTel's utilization level of 70.283% is below the required utilization level of 75% and the months to exhaust is 56.166 and 59.166 which is above the required 6 months. Also, CenturyTel does not have 2 consecutive blocks of one-thousand telephone numbers. For this reason, CenturyTel has demonstrated a verifiable need for 2 consecutive blocks of one-thousand additional telephone numbers in the O'Fallon rate center. Staff recommends the Commission issue an order overturning the decision of the Pooling Administrator by granting CenturyTel 2 consecutive blocks of one-thousand telephone numbers in the 636-542 NPA/NXX within the range of 5000 to 6999 or 6000 to 7999 in the O'Fallon rate center. Specifically, Staff recommends the Commission's order include a statement substantially as follows:

1. CenturyTel's request for 2 consecutive blocks of one-thousand telephone numbers in the 636-542 NPA/NXX within the XXXX range of 5000 to 6999 or 6000-7999 in the O'Fallon rate center is granted.

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: (☐ No annual report ☐ Unpaid PSC assessment.  
Amount owed: )

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<sup>1</sup> Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

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In the Matter of the Application of )  
CenturyTel of Missouri, LLC For Review ) Case No. TO-2010-0079  
and Reversal of North American Number )  
Plan Thousands-Block Pooling )  
Administrator's Decision to Withhold )  
Numbering Resources )

**AFFIDAVIT OF Sara Buyak**

STATE OF MISSOURI )  
 ) ss:  
COUNTY OF COLE )

Sara Buyak, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in preparing 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 9<sup>th</sup> day of September 2009.

  
NOTARY PUBLIC

