

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

In the Matter of the Application of	)	
Southwestern Bell Telephone, L.P., d/b/a	)	
AT&T Missouri For Review and Reversal	)	Case No.
Of North American Number Plan	)	
Administrator's Decision to Withhold	)	
Numbering Resources	)	

**SOUTHWESTERN BELL TELEPHONE, L.P.,  
D/B/A AT&T MISSOURI'S APPLICATION**

COMES NOW Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri") and files this verified application, pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), and 47 CFR 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an Order that reviews and reverses the decision of the North American Numbering Plan Administrator, NeuStar, Inc., ("NANPA") to withhold certain numbering resources from AT&T Missouri, in a form of six consecutive blocks of 1,000 numbers to service the needs of the Department of the Treasury, Internal Revenue Service ("IRS") a customer of AT&T Missouri in the Kansas City area that is consolidating eight existing locations in the Kansas City metropolitan area into one new complex. In support of its application, AT&T Missouri states as follows:

1. AT&T Missouri is a Texas limited partnership<sup>1</sup>, duly authorized to conduct business in Missouri,<sup>2</sup> with its principal Missouri office at One SBC Center,

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<sup>1</sup> AT&T Missouri filed a copy of its Limited Partnership Agreement with the Commission on October 12, 2001. See In the Matter of the Application of Southwestern Bell Telephone Company To Transfer Property and Ownership of Stock Pursuant to Section 392.200, RSMo., Case No. TO-2002-185, October 12, 2001.

<sup>2</sup> AT&T Missouri filed a certificate from the Missouri Secretary of State Certifying that Southwestern Bell Telephone, L.P. is a foreign limited partnership that is duly authorized to transact business in the State of Missouri with the Commission on January 7, 2002. See In the Matter of the Application of Southwestern Bell Telephone Company to Transfer Property and Ownership of Stock Pursuant to Section 392.300, RSMo., Case No. TO-2002-185, January 7, 2002.

Room 3520, St. Louis, Missouri, 63101. AT&T Missouri is authorized to do business in Missouri and its fictitious name is duly registered with the Missouri Secretary of State.<sup>3</sup> AT&T Missouri is a “local exchange telecommunications company” and a “public utility,” and is duly authorized to provide “telecommunications service” within the State of Missouri as each of those phrases is defined in Section 386.020, RSMo. 2000.

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Paul G. Lane  
Leo J. Bub  
Robert J. Gryzmala  
Mimi B. MacDonald  
Attorneys for Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri  
One SBC Center, Room 3510  
St. Louis, Missouri 63101

3. The IRS has requested 6,000 Direct Inward Dial (“DID”) contiguous numbers and has specifically requested that the NXX of these numbers end in 0, 1, 2, 4, 5, or 7 (or conversely that the NXX of the numbers does not end in 3, 6, 8, or 9).<sup>4</sup> AT&T Missouri has researched the available blocks in its Kansas City rate center, which serves the area in which the new IRS complex is located. A copy of a letter from Brenda J. Long, IT Specialist for the IRS, to AT&T Missouri, dated February 10, 2006, is attached hereto and marked Exhibit A.

4. On February 13, 2006, AT&T Missouri submitted a Thousand-Block Application Form, Part 1A, for the assignment of six one thousand blocks to meet the

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<sup>3</sup> AT&T Missouri filed a copy of the registration of the fictitious name “AT&T Missouri” with the Commission on December 7, 2005. See In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri for Review and Reversal of the North American Number Plan Administrator’s Decision to Withhold Numbering Resources, Case No. TO-2006-0247, December 7, 2005.

<sup>4</sup> The IRS will be utilizing 5-digit dialing within its voice network. It does not want NXX of the numbers to contain a 3 or a 6 because those numbers are currently being utilized at other IRS locations and those numbers will not change. Additionally, the IRS would like to avoid prefixes ending in 8 or 9 so that it does not have a conflict dialing 911 calls or making outside access calls.

IRS's request. A copy of the Application is attached hereto and is marked as Exhibit B. AT&T Missouri completed the application in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet which is attached hereto and marked as Exhibit C.

5. AT&T Missouri submitted the request for six one thousand blocks because AT&T Missouri does not have six one thousand blocks which meet the criteria requested by the IRS. AT&T Missouri is unable to use numbers from any other switch in the Kansas City exchange to satisfy the IRS's request.

6. On or about February 13, 2006, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization criteria of 75% as required by the Federal Communications Commission. That decision is attached hereto and marked Exhibit D.

7. 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 a state commission may choose to reaffirm or overturn NANPA's decision to withhold numbering resources.<sup>5</sup> 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

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<sup>5</sup> 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 CFR 52.15(g)(3)(iv).

numbering resource application requirements herein.”<sup>6</sup> Moreover, the FCC determined that states may overturn NANPA’s decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request:

We also agree with WinStar that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.<sup>7</sup> The FCC explained that a “[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center.”<sup>8</sup> The FCC further explained that states “may grant request for customers seeking contiguous blocks of numbers.”<sup>9</sup> Further, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated “in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.”<sup>10</sup>

8. AT&T Missouri seeks the Commission’s direction to overturn NANPA’s decision to withhold numbering resources. The FCC permits such direction in order to meet specific customer demand. This Commission has previously overturned NANPA’s decision to withhold numbering resources in the following cases: (1) 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. TO-2006-0231, December 13, 2005; (2) Order Reversing Decision of the North

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<sup>6</sup> Id.

<sup>7</sup> Third Report and Order and Second Order on Reconsideration in CC Docket Number 96-98 and CC Docket Number No. 99-200, In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Telephone Number Portability, CC Docket Number 99-200, et al., December 12, 2001, paragraph 64.

<sup>8</sup> Id.

<sup>9</sup> Id.

<sup>10</sup> Id. at paragraph 66.

American Numbering Plan Administrator and Closing Case, 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. TO-2005-0406, May 26, 2005; (3) 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 the North American Numbering Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2005-0312, April 19, 2005; (4) Order Granting Additional Numbering Plan 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; (5) 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 2, 2002.

9. AT&T Missouri 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.

10. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.


11. AT&T Missouri asks that the Commission act on this request within ten (10) business days as envisioned by the FCC. The IRS has informed AT&T Missouri

that it would like to have these numbers by May 1, 2006, so that planning and number assignments can be done prior to actual move in. In order to accommodate the IRS's request, the Commission must issue its order as soon as possible, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of six one thousand blocks to AT&T Missouri to meet the IRS's needs, and so that AT&T Missouri, and any other telecommunications provider that provides service via a switch, can program its switch.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten business days as envisioned by the FCC, and instruct NANPA to release the numbering resources necessary to meet the needs of the IRS.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

By:   
PAUL G. LANE #27011  
LEO J. BUB #34326  
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## **CERTIFICATE OF SERVICE**

Copies of this document were served on all counsel of record by e-mail on February 23, 2006.

  
Mimi B. MacDonald

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**Thousands-Block Application Form  
Part 1A****Type of Application (check one):** ☒ **New** ☐ **Change<sup>i</sup>** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: **SBC SOUTHWEST**Headquarters Address: **2600 CAMINO RAMON** City **SAN RAMON** State **CA** Zip **94583**Contact Name: **LOURDES PANOPIO**Contact Address: **2600 CAMINO RAMON, 1S9000** City **SAN RAMON** State **CA** Zip **94583**Phone: **925-823-9276** Fax: **925-355-9268**E-Mail: **lp1721@camail.sbc.com****Pooling Administrator<sup>ii</sup>:**Contact Name: **GENEVIEVE PAULINO**Contact Address: **1800 SUTTER STREET, Suite 571** City **CONCORD** State **CA** Zip **94520**Phone: **925-363-7652** Fax: **925-363-7683**E-Mail: **genevieve.paulino@neustar.com****1.2 General Information****Check one:** No LRN needed ☒ **LRN needed<sup>iii</sup>** \_\_\_\_\_NPA: **816** LATA: **524** OCN<sup>iv</sup>: **9533** Parent Company's OCN **9533**Number of Thousands-Blocks Requested: **6**Switch Identification (Switching Entity/POI)<sup>v</sup>: **KSCYMO55DS3** City or Wire Center Name **MCGEE**Rate Center<sup>vi</sup>: **KANSASCITY** Rate Center Sub Zone: \_\_\_\_\_**1.3 Dates**Date of Application<sup>vii</sup>: **02/13/06** Requested Block Effective Date: **03/13/2006**Request Expedited Treatment? (See Section 8.6) Yes ☒ No \_\_\_\_\_**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: **ILEC** (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: **WIRELINE**c) Thousands-Block(s) (NXX-X) assignment preference (optional) **xxx-nx2, nx4, nx5, nx7 – For Dedicated Customer, US Gov't-IRS**d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any **xxx-nx3, nx6, nx 8, nx 9**

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) \_\_\_\_\_.

**1.5 Type of Request**

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Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – November 21, 2003  
ATIS-0300066.at1

**Thousands-Block Application Form**  
**Part 1A**

Initial block for rate center: Yes\_\_\_\_, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes **X**, If Yes, attach months to exhaust worksheet

Change block: Yes\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:

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Disconnect block: Yes\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines INC 99-0127-023

SIGNATURE ON FILE

Signature of Block Applicant

DATA ADMINISTRATOR

Title

February 15, 2006

Date

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## Thousands-Block Application Form

### Part 1A

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**Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under “Block Applicant” the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>viii</sup>. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

## **Thousands-Block Application Form Part 1A**

Foot Notes:

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<sup>i</sup> Identify type of and reason for change(s) in Section 1.6.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

### Appendix 3 - Modified August 6, 2001

#### MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level <sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Date: 02/13/06 OCN: 9533 Company Name: SBC SOUTHWEST

Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX: 267; NPA/NXX-X: 588

Name of Block Applicant: CONNIE MC NAUGHTON Signature: SIGNATURE ON FILE

Title: MANAGER CODE ADMINISTRATOR Telephone No.: 925-824-5627 FAX No.: 925-355-9268

E-Mail: cm3123@camail.sbc.com

A. Available numbers: 316902

B. Assigned numbers: 768008

C. Total Numbering Resources: 1224867

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None

List excluded Code(s) or Block(s): None

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months <sup>2</sup>	<u>10752</u>	<u>-4536</u>	<u>1371</u>	<u>-102</u>	<u>-2684</u>	<u>2214</u>						
F. Forecast – Next 12 months <sup>3</sup>	<u>0</u>	<u>1876</u>	<u>8311</u>	<u>1396</u>	<u>0</u>	<u>1488</u>	<u>1074</u>	<u>1220</u>	<u>1058</u>	<u>433</u>	<u>-597</u>	<u>674</u>
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>2178.500</u>											
H. Months to Exhaust <sup>4</sup>	<u>Numbers Available for Assignment to Customers (A)</u>								=	<u>145.468</u>		
	<u>Average Monthly Forecast (G)</u>											
I. Utilization <sup>5</sup>	<u>Assigned Numbers (B) – Excluded Numbers (D)</u>						<u>* 100</u>		=	<u>62.701%</u>		
	<u>Total Numbering Resources (C) – Excluded Numbers (D)</u>											

Explanation: K-Block Assignment Preference: 816-xxx-2000-7999; Undesirable: 816-xxx-0, 1, 8, 9. Actual Month 1(-12670) & Month 5(-751). For Dedicated Customer, US Gov't-IRS. Requesting for an Expedite Effective Date.

<sup>1</sup> A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup> Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

<sup>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

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Request For Resources

New

Modify

Disconnect

Block Transfer

Confirm Block(s) in Service (Part 4)

Search Forms

Submit Forecast

User Profile

Donate Blocks

Reports

ip1721@msg.pacbell.com (SP)

Sign Out

Pooling Administration System

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to 62.701 percent. The FCC requires a utilization of 75.000 percent.

Select One Option and Submit

☐ Return to the Months To Exhaust Form

☐ Discard all the information provided for the request and start with a fresh Part 1A

☒ State Waiver Option

Submit

Cancel

Question? E-mail us

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Internet



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, DC 20224

February 10, 2006

Jon W. Florey  
Client Business Manager  
AT&T Government Solutions  
370 3<sup>rd</sup> St., Room 604  
San Francisco, CA 94107

Dear Mr. Florey,

The Internal Revenue Service, a federal government agency, will require new ISDN-PRI telephone service from AT&T Government Solutions at our new complex being built at 333 W. Pershing Rd., Kansas City, Missouri. This service will be required to support a new IP PBX system that has been ordered and is planned for installation this summer.

We are consolidating eight existing locations in the Kansas City metropolitan area into this new complex. We are requesting that AT&T provide a block of 6,000 consecutive DID telephone numbers for our use at our new complex. The IRS would like to have these 6,000 numbers by May 1, 2006, so that planning and number assignments can be done prior to the actual move in.

Three other IRS sites within the Kansas City metropolitan area will not consolidate into the new complex but will be networked with the new complex. These three sites will retain their existing numbers. Those number ranges are:

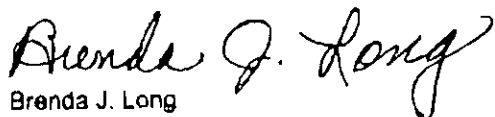
816-823-0900 through 816-823-0999  
816-503-4200 through 816-503-4299  
816-966-2300 through 816-966-2599  
816-966-2800 through 816-966-2899

We will be utilizing 5-digit dialing within our voice network. The new 6,000 DID telephone numbers should not conflict with the last 5-digits of the numbers listed above. Therefore, we would like to avoid prefixes ending in a 3 or 6. Also, we would like to avoid prefixes ending in 8 or 9 so we don't have a conflict dialing 911 calls or making outside access calls.

It is our understanding from AT&T that there are no available telephone numbers to meet our request for service. It is important that we know whether these numbers will be made available as soon as possible as this impacts the transition to the new telephone system.

If you have any questions, please contact me at 816-823-8905. Thank you for your prompt attention to this request.

Sincerely,



Brenda J. Long  
IT Specialist  
Internal Revenue Service  
Mail Stop 6360 BB  
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Kansas City, MO 64131