BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Application of CenturyTel of)		
Missouri, LLC d/b/a CenturyLink, For Review and	í		
Reversal of North American Number Plan	í c	Case No.	
Thousands-Block Pooling Administrator's Decision	, ~		
to Withhold Numbering Resources.	Ś		

CENTURYTEL OF MISSOURI, LLC d/b/a CENTURYLINK'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW CenturyTel of Missouri, LLC d/b/a CenturyLink (CenturyLink) and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. (NANPA), to withhold certain numbering resources from CenturyLink. CenturyLink files this verified Application and Motion for Expedited Treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv). The requested numbering resources are necessary to meet the needs of the Grand Crown Resort in Branson, Missouri as it seeks to simplify its dialing pattern and to provide 9-1-1 services as it deploys a new telecommunications system. The resources requested consist of one sequential, thousands-block within the NPA-NXX of 417-266, with the specific range of 2000 to 2999 requested.

In support of this Application, CenturyLink states as follows:

CenturyLink is a Louisiana limited liability corporation that is duly authorized
to do business in the State of Missouri and authorized by the Commission to
provide basic local and interexchange telecommunications services. Copies of
CenturyLink's Certificate of Authority to transact business in Missouri from the

Missouri Secretary of State were filed in Case No. TM-2002-232¹, and are incorporated herein by reference pursuant to 4 CSR 240-2.060(1)(G).

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

Linda K. Gardner Mailstop: KSOPKJ0702 5454 W. 110th Street Overland Park, KS 66211 Tele: 913-345-6193

Fax: 913-397-3598

Email: Linda.gardner@centurylink.com

- 3. There are no pending actions or final unsatisfied judgments or decisions against CenturyLink from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.
- 4. The Grand Crown Resort in Branson, Missouri is in the process of implementing a telecommunication system in a new development of resort condominiums. In order to more easily number and identify the condominiums for emergency responders and in order to meet the requirements of its telephone system's software for providing 9-1-1 capabilities, a sequential set of Direct Inward Dial (DID) numbers is requested.²

¹ In the Matter of the Joint Application of GTE Midwest Incorporate, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri: 2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) to Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) to Designate CenturyTel of Missouri, LLC, as a Telecommunications Carrier Eligible to Receive Federal Universal Support, Case No. TM-2002-232.

- 5. With the establishment of this telephone system, the Grand Crown Resort will need 1000 DID numbers for the anticipated number of condominiums that will be build within the single development. Given the need for an additional 1000 DID numbers and the installation of the new phone system within this growing development, combining the DID numbers into a sequential numbering plan will be more efficient, easier to use and will provide easier assignment for emergency response location purposes.
- 6. CenturyLink has researched the available blocks in its Branson rate center (BASNMOXADSO) which serves this customer. CenturyLink has no thousandsblocks available for use from which to draw the requested numbering resources that would the Grand Crown Resort's needs. As a result of this research, CenturyLink requests that the Commission grant it numbering resources with the NPA-NXX of 417-266, with the specific range of 2000 to 2999 requested.
- 7. On March 2, 2010, CenturyLink submitted a Thousands-Block Application Form,
 Part 1A, for the numbering resources assignment necessary to meet the Grand
 Crown Resort's needs. ³ CenturyLink completed the Thousands-Block
 Application Form 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.⁴
- On or about March 2, 2010, NANPA denied the requests on the grounds that CenturyLink had not met the utilization criteria.⁵

³ A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

⁴A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

⁵ A copy of that decision is attached hereto and marked as Exhibit D.

- 9. CenturyLink seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases where customers have required a large amount of sequential numbers and it should likewise do so here.
- 10. 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 affirm or overturn NANPA's decision to withhold numbering resources. Thus, the 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." 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.
- 11. The FCC further explained in its March 31, 2000 Order that a "[c]arrier may demonstrate such a need by providing the state with documentation of the

⁶ Report and Order and Further notice of proposed Rule Making, In the Matter of numbering Resource optimization. CC Docket No. 99-200, rel March 31, 2000, Appendix A; see also, 47 CFR 52.15(g)(3)(iv).

⁷ Id.

⁸ Third Report and Order and Second Order on Reconsideration, in the matter of numbering Resource optimization, CC Docket No. 99-200, et al, rel. December 28, 2001, para. 64; see also, 47 CFR 52.15(g)(4).

customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers." 9 Moreover, 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."10

- 12. Further, this Application complies with 4 CSR 240-37.040. CenturyLink has attached hereto its "Months to Exhaust Worksheet" indicating the utilization for the Branson rate center encompassing the preceding six months and projected monthly utilization for the next twelve months. 11 CenturyLink has also attached its most recently filed FCC Form U1 of Form 502 for the Branson rate center. 12 Finally, CenturyLink attaches copies of its originally-filed requests to NANPA and NANPA's denial of those requests. 13 These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyLink has exhausted all other available remedies designed to conserve numbering resources.
- 13. CenturyLink seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as

⁹ Id.

¹⁰ *Id.*, at para. 66.

¹¹ See Exhibit C.

¹² The portions of FCC Form U1 of Form 502 pertaining to the Branson rate center are attached hereto and marked as Exhibit E (HC) as it contains exchange specific customer numbers. ¹³ See Exhibits B and D.

Resort's needs, the Commission must issue its order as soon as possible so that CenturyLink will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyLink described herein, both to meet the Grand Crown Resort's needs but also so that CenturyLink and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely basis. CenturyLink filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

WHEREFORE, CenturyLink respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of the Grand Crown Resort in Branson, Missouri.

Respectfully Submitted,

Linda K Gardner Mo Bar #32224

5454 W. 110th Street

Overland Park, Kansas 66211

Tele. 913-345-6193

e-mail: Linda.gardner@centurylink.com

Attorney for CenturyTel of Missouri, LLC d/b/a CenturyLink

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 26 day of April 2010, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

Steve Reed General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65101 gencounsel@psc.mo.gov

Office of the Public Counsel P.O. Box 2200 Jefferson City, MO 65101 mopco@ded.mo.gov

Kathy Mehrer

VERIFICATION

STATE OF MI	SSOURI)	
)	SS.
COUNTY OF	JEFFERSON)	

I, Becky Owenson Kilpatrick, of lawful age, and being first duly sworn, now state: I am Manager, Regulatory for the South-Central Region for CenturyLink, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief

Becky Owenson Kilpatrick

Subscribed and sworn to before me this day of April, 2010.

Notary Public

My Appointment Expires:

RODNEY A. MISCHKE
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 22, 2013
Commission Number: 09827277



Date: 4-7-2010

From: Danny Henderson, Telecomm Manager, Grand Crowne Resorts, Inc., LLC

subj: Request for 1000 DID numbers

To: [Commissioner Name]

As requested we submit the following information associated with our request for 1000 DID numbers.

The business name, as well as the contact person's name, title and telephone number.
 Grand Crowne Resorts, Inc., LLC

Danny A. Henderson Telecomm Manager 417-332-8423 Office 417-676-0047 Mobile

- b. A detailed explanation regarding why the specific number ranges are needed. The DID numbers are required to comply with 911 services for our new PSALI software. Our Grand Crowne Resort location is only halfway finished and already has 498 condos that need DID's for 911 compliance. In addition the current list of numbers we have received are not in consecutive sequence making building location and unit numbering plant that much more difficult. We need at least the 498 plus another 502 since the Grand Crowne Resort is only halfway completed.
- c. The total number of telephone numbers currently in service and the date the new numbers will be activated if the numbering request is approved.

Currently we have 1,399 DID telephone numbers at our 430-C State Hwy., Branson, Mo. 65616.

List of all number blocks currently assigned to customer: 417-332-8200 thru 8599 (399) used for employees 417-243-4554 thru 4599 (46) unused block not large enough 417-243-5000 thru 5099 (100) portion used for Hotel floors CID

417-243-5701 thru 5099 (544) block not large enough for GC resort 417-243-7200 thru 7521 (310) used for Surrey resort condo DIDs

We do not want to change any numbers we just want a 1000 block of consecutive numbers that would be large enough to cover our Grand Crowne Resort with consecutive numbers

We currently have around 1500 telephone numbers in use at various locations.

- d. We can get rid of the unused block of numbers listed above if necessary but it would be much simpler if we could just get a new block of 1000 numbers to accommodate the existing condos and future expansion of our Grand Crowne Resort which has almost 500 extensions and is only halfway completed.
- f. The anticipated expenses and/or problems that the business may incur if the numbering request is denied.

Denial of the numbering request is not acceptable for our best business practices.

g. Clarification of any unusual issues related to their request.

Customer signature Title Delecom Manager, Grand Course Resonts, Fur, UC

Thousands-Block Application Form - Part 1A

Tracking

417-BRANSON-MO-

Number:

345817

Individual Block

Request

Type of

New

Change

Application:

Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name:

CENTURYTEL MO (SW)

Headquarters

Address:

100 Centurylink Drive

City, State, Zip: Monroe, LA, 71203

Contact Name: Shannon Wiese

Contact

333 North Front Street

Address:

City, State, Zip: La Crosse, WI, 54601

Phone: 608-

FAX: _608-796-

796-5116 -5116 7990

E-mail: shannon.wiese@centurylink.com

Pooling Administrator: ii

Contact Name: Genevieve Bettiga

Contact

Address:

1800 Sutter St

City, State, Zip: Concord, CA,94520

Phone:

925-363-7652

FAX: <u>925-363-7683</u>

E-mail: genevieve.bettiga@neustar.biz

1.2 General Information:

Check one: No LRN needed X LRN needed iii

NPA: 417

LATA:

OCN: iv 9787

Parent Company's OCN 5775

Number of Thousands-Blocks Requested: 1

Switching Identification(Switch Entity/POI): v

https://www.nationalpooling.com/pas/search/print form.jsp

basnmoxads0
City or Wire Center Name : Branson Rate Center: vi BRANSON
Rate Center Sub Zone:
1.3 Dates:
Date of Application: vii 03/02/2010 Requested Block Effective Date: viii
Date of Application: vii 03/02/2010 Requested Block Effective Date: viii 04/02/2010
By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.
Request Expedited Treatment? (See Section 8.6) YesNoX
1.4 Type of Service Provider Requesting the Thousands-Block:
a) Type of Service Provider: <u>Incumbent Local Exchange Carrier (ILEC)</u> (LEC, IXC, CMRS, Other)
b) Primary type of service Blocks to be used for: Wireline
c) Thousands-Block(s) (NXX-X) assignment Preference (Optional)
would like a 2 block 417-266-2 would be great.
d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any customer can not us the 8 or 9 block
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:
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
By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.
Type of change(Mark all that apply)
OCN:Intra-company ix Switching Id Part 1B
OCN:Inter-company x Effective Date
Change block: Yes If Yes, list NPA-NXX-X
1
1.6 Block Return :
a) Is this block Contaminated Ves No.

b)	If Yes how many TNs are NOT available for assignment:		
c)	Have all new Intra SP ports been completed in the NPAC	Yes No	
d)	Has this block been protected from further assignment Ye	sNo	
Dis	connect block: YesIf Yes, list NPA-NXX-X		
Ren	narks:		
Tho the	reby certify that the above information requesting an NXX-best of my knowledge and that this application has been preusands-Block (NXX-X) Pooling Administration Guidelines ATIS web site (http://www.atis.org/inc) or by contacting inclication.	pared in accord	dance with the
Sha	nnon Wiese	Area Supervisor	03/02/2010
Sign	nature of Block Applicant	Title	Date

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 TM LERG TM 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 TM 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 TM tandem of the facilities based provider Xi. 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. The 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.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

ⁱ Identify the type of change(s) in Section 1.5.

ii The Pool Administrator is available to assist in completing these forms.

iii A CO Code application will also need to be submitted to the PA.

iv 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).

^v 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 CLLITM code of the switch /POI.

vi Rate Center name must be a tariffed Rate Center.

vii 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.

viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹ (Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 417-BRANSON-MO-345817

Date: 03/02/2010

OCN:9787

Company Name: CENTURYTEL MO (SW)

Rate Center: BRANSON

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):417-239-0,1,2,3,8,9 417-243-1,2,3,4,5,7,8 417-266-3,4,7 417-330-0,1,2,3,4,5,6,7,8,9 417-332-0,1,2,3,4,5,6,7,8,9 417-334-0,1,2,3,4,5,6,7,8,9 417-335-0,2,3,4,5,6,7,8,9 417-336-0,1,2,3,4,5,6,7,8,9 417-337-5,6,7,8,9 417-339-0,1,2,3,4,5,6,7,8,9 417-348-0,1,2,3,4,5,6,7,8,9 417-791-0,

Name of Block Applicant: Shannon Wiese

Signature: Shannon Wiese

Title: Area Supervisor 608-796-7990

Telephone No.: 608-796-51165116

FAX No .:

E-mail: shannon.wiese@centurylink.com

A. Available Numbers: 14841

B. Assigned Numbers: 74159

C. Total Numbering Resources:89000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²:0

List Excluded Code(s) or Block(s):

Month Month

Explanation: _

F. Forecast - Next 12 months ⁴	1	0	0	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	0	<u>0</u>	0	<u>0</u>
G. Average N	Monthly	Foreca	ast (Sur	n of mo	onths 1-	6 (Part	F above	e) divid	led by 6	(): <u>0.167</u>	6 6 6	
H. Months to Exhaust ⁵	Num		ailable Custom		signmer	nt to						
Average Monthly Forecast(G)												
Block Requested Available Numb 1 14841						mbers		Outre-source seeman	s To E			
I. Utilization ⁶ Assigned Numbers(B) - Excluded Numbers X 100 = (D) 83.325												
Total Numbering Resources(C)-Excluded Numbers(D)												

¹A 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.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received=10,000).

³Net 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.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To 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, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

November 21, 2003 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number :	417-BRANSC 345817	ON-MO-	ii.	
Date of Application:	03/02/2010		Effective Date:	
Date of Receipt:	03/02/2010		Date of Response:	03/02/2010
Service Provider Name:	CENTURYTE	L MO (SV	V)	
(Telcordia [™] LERG [™] Routing Guide) OCN:	9787			
NPAC SOA SPID :	·			4.
Pooling Administrator Contac Genevieve Bettiga	t Information:	Phone:		925-363-7652
Signature of Pooling Administrat	tor			020-000-1002
Genevieve Bettiga		Fax:		925-363-7683
Name (print)				
Email:		genevie	ve.bettiga@neustar.biz	*
NPA-NXX or NPA-NXX-				
X:			Block Assigned:	
			Block Reserved:	
			Block Reservation Date :	n Expiration
			Block/Code Modit	
Plant Cantagin to 104			Block/Code Disco	onnected :
Block Contaminated (Yes of			0	11,
If Yes,enter the number of		ated :		
Switch Identification(Switch	Entity/POI): 1		basnmoxads0	
Rate Center:			BRANSON	
Rate Center Sub Zone:				
X Form Complete, request a Explanation:	denied.			
	be BATE and to	. 1 12-17		= 0 V/W25W 00 00
DR-57: You do not meet t a new block is denied. Yo appropriate state commis disposition of this reques Administration Guideline	is may procee sion using thi it, please refer	s Part 3 of to the Th	questing a State Waive Ienial. If you are in disa Iousands-Block Numbe	r from the
Request withdrawn. Explanation:	6			
Across Mary Conditional April 1997				
Assignment activity susp	anded by the	adminiat-	oto v	=
Explanation:	ended by the a	administi	alor.	#5

-	-21		100		69000	37
w	a	m		PK.	S	
12	-	111	i Cit			٠

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)