

**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 Administrator's Decision To ) Case No. \_\_\_\_\_  
Withhold Numbering Resources for the )  
Warrenton, Wentzville, Defiance, Dardenne )  
& Moscow Mills, Missouri Rate Centers. )

**APPLICATION of  
CENTURYTEL OF MISSOURI, LLC**

COMES NOW CenturyTel of Missouri, LLC ("CenturyTel") and files this verified application, pursuant to 4 CSR 240-2.060 and 47 C.F.R 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an order that reviews and reverses the recent decision of the North American Numbering Plan Administrator, NeuStar, Inc., ("NANPA") to withhold certain numbering resources from CenturyTel in the form of the following: (a) one block of 1,000 numbers within a new non-MCA NXX code to be assigned to the Warrenton, Missouri rate center; (b) two blocks of 1,000 numbers within the existing MCA NXX code of 636-887 assigned to the Wentzville, Missouri rate center; (c) one block of 1,000 numbers within the existing MCA NXX code of 636-695 assigned to the Dardenne, Missouri rate center; (d) one block of 1,000 numbers within the existing MCA NXX code of 636-798 assigned to the Defiance, Missouri rate center; and (e) one block of 1,000 numbers within the existing MCA NXX code of 636-366 assigned to the Moscow Mills, Missouri rate center. Whereas MCA numbers within CenturyTel's Wentzville, Dardenne, Defiance and Moscow Mills rate centers, and non-MCA numbers within CenturyTel's Warrenton rate center may be exhausted in the near future, CenturyTel requires all of the requested blocks of 1,000 numbers in the Warrenton, Wentzville, Dardenne, Defiance and Moscow Mills rate centers, as indicated above, to service the future needs of customers requiring MCA and non-MCA numbers. In support of its Application, CenturyTel states as follows:

1. CenturyTel is a Louisiana limited liability corporation that is duly authorized to do business in the state of Missouri. Copies of CenturyTel's Certificate of Authority to transact business in Missouri from the Missouri Secretary of State were filed in Case No. TM-2002-232, and are incorporated herein by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G). CenturyTel's principle place of business in Missouri is 1151 CenturyTel Drive, Wentzville, Missouri 63885. CenturyTel is a "telecommunications company" and a "public utility" as those terms are defined in §386.020, RSMo 2000, and, thus, is subject to the jurisdiction, supervision and control of this Commission.

2. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

Becky Owenson Kilpatrick, Esq.  
CenturyTel  
220 Madison Street  
Jefferson City, Missouri 65101  
Telephone: (573) 636-4261  
Facsimile: (573) 636-6826  
[becky.kilpatrick@centurytel.com](mailto:becky.kilpatrick@centurytel.com)

3. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Warrenton exchange. CenturyTel is close to exhaustion for the non-MCA NXX numbers in this rate center. In fact, at the time of this filing, CenturyTel had only 236 numbers available in the non-MCA NXX code of 636-456 and requires a new NXX code to be assigned to this rate center.

4. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Wentzville exchange. CenturyTel is close to exhaustion and requires that two blocks of 1,000 numbers in the MCA NXX code of 636-887 be assigned to this rate center.

5. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Dardenne exchange. CenturyTel is close to exhaustion and requires that one block of 1,000 numbers in the MCA NXX code of 636-695 be assigned to this rate center.

6. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Defiance exchange. CenturyTel is close to exhaustion and requires that one block of 1,000 numbers in the MCA NXX code of 636-798 be assigned to this rate center.

7. CenturyTel is required to use segregated and dedicated NXX codes to provide customers non-MCA service and optional MCA service in the Moscow Mills exchange. CenturyTel is close to exhaustion and requires that one block of 1,000 numbers in the MCA NXX code of 636-366 be assigned to this rate center.

8. Accordingly, on or about July 25, 2007, CenturyTel submitted its Applications to NANPA requesting additional NXX-X blocks in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines, and filled out the necessary Months to Exhaust and Utilization Certification Worksheets. Copies of the Applications and accompanying Worksheets are attached hereto, and incorporated herein by reference, as **Exhibits A (Warrenton), B (Wentzville), C (Dardenne), D (Defiance) and E (Moscow Mills)**, respectively.

9. CenturyTel submitted the requests for additional thousand blocks because CenturyTel is on the verge of exhausting its MCA numbers within the Wentzville, Dardenne, Defiance and Moscow Mills central offices; and non-MCA numbers within the Warrenton central office. While CenturyTel does have numbers available within non-MCA NXXs in the Wentzville, Dardenne, Defiance and Moscow Mills rate centers, CenturyTel is unable to use

those numbers due to the Commission's requirement that MCA and non-MCA service be provided over segregated NXX codes. In addition, while CenturyTel does have numbers available within MCA NXXs in the Warrenton rate center, CenturyTel is unable to use those numbers due to the Commission's requirement that MCA and non-MCA service be provided over segregated NXX codes. CenturyTel cannot assign individual numbers as MCA or non-MCA; rather, the entire NXX must be so designated.

10. NANPA denied the request on the grounds that, pursuant to CenturyTel's Months to Exhaust and Utilization Worksheets, CenturyTel's utilization calculates to the following percentages for each exchange:

- (a) Warrenton – 89.482 percent
- (b) Wentzville – 70.100 percent;
- (c) Dardenne – 70.685 percent;
- (d) Defiance – 24.725 percent; and
- (e) Moscow Mills – 40.783 percent.

The FCC requires a utilization of 75.000 percent. The requests were denied notwithstanding the fact that CenturyTel, in the near future, will not have the numbering resources needed to satisfy its customers' MCA or, with respect to the Warrenton rate center, non-MCA demands in the switches at issue. The NANPA's decision with regard to the Warrenton rate center is attached as **Exhibit F**.

11. 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 the state commission may

choose to affirm or overturn NANPA's decision to withhold numbering resources. (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 C.F.R. 52.15(g)(3)(iv), attached hereto and marked as **Exhibit G**). 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 numbering resource application requirements herein." Id.

12. CenturyTel seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission previously overturned NANPA's decision to withhold numbering resources to CenturyTel for its Wentzville, Missouri Rate Center in 2005 in its Order Granting Additional Numbering Resources, Case No. IO-2006-0195, December 19, 2005; and Order Granting Additional Numbering Resources, Case No. IO-2005-0179, January 27, 2005. *See also*, Order Granting Additional Numbering Resources, Case No. IO-2005-0178, January 11, 2005; 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 20, 2002; 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. IO-2003-0318, April 1, 2003.

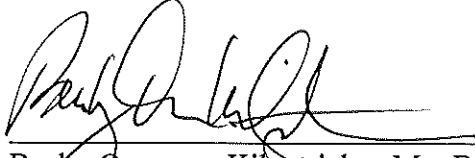
13. CenturyTel does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates,

which action, judgment, or decision has occurred within three (3) years of the date of this Application.

14. CenturyTel does not have any annual report or assessment fees that are overdue in Missouri.

Wherefore, CenturyTel respectfully requests that the Commission overturn NANPA's previous determination in this matter, and instruct NANPA to release the numbering resources necessary to meet the needs of CenturyTel's customers as set forth herein.

Respectfully submitted,



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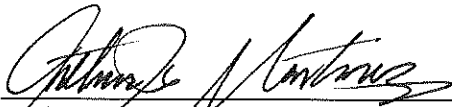
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Attorney for CenturyTel of Missouri, LLC

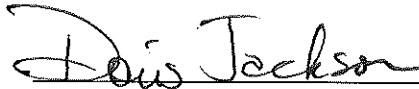
VERIFICATION

STATE OF MISSOURI            )  
  ) SS  
COUNTY OF COLE            )

I, Arthur P. Martinez, of lawful age, being first duly sworn upon my oath, state that I am the Region Director of Government Relations of CenturyTel and that I am authorized to execute this Application on behalf of CenturyTel of Missouri, LLC; and that the facts set forth in the foregoing Application are true to the best of my knowledge, information and belief.

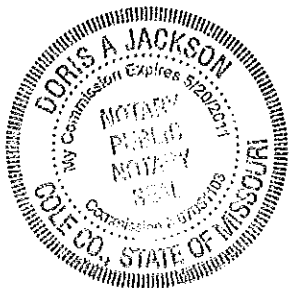
  
\_\_\_\_\_  
Arthur P. Martinez

Subscribed and sworn to before me this 9<sup>th</sup> day of August, 2007.

  
\_\_\_\_\_  
Notary Public

My Commission expires:

\_\_\_\_\_ 5/20/2011 \_\_\_\_\_

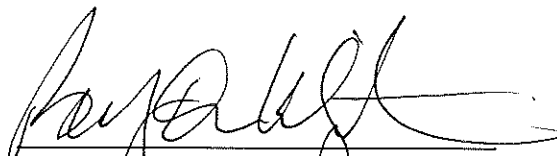


## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, emailed or mailed this 9<sup>th</sup> day of August, 2007 to:

Mr. Michael Dandino  
Senior Public Counsel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Mr. William Haas,  
Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102



Becky Owenson Kilpatrick