

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

In the Matter of a Request for Expansion of)
the St. Louis Metropolitan Calling Area Plan to)
Include the Exchanges of Washington, Union,)
Wright City, St. Clair, Marthasville, Beaufort,)
Foley, and Warrenton.)
Case No. TO-2005-0141

RESPONSE TO ORDER DIRECTING FILING

Comes now, the Staff of the Missouri Public Service Commission (“Staff”), the Office of Public Counsel (“OPC”), CenturyTel of Missouri, L.L.C. (“CenturyTel”), Spectra Communications Group, L.L.C. d/b/a CenturyTel (“Spectra”), Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri (“AT&T Missouri”), Fidelity Telephone Company (“Fidelity”), the Missouri Independent Telephone Group (“MITG”), and Orchard Farm Telephone Company (“Orchard Farm”), collectively referred to as “the parties”, and state as follows:

1. On February 3, 2006, the Missouri Public Service Commission entered its Order Setting Time for a Stipulation Hearing and Order Directing Filing (“Order”). In its Order, the Commission indicated that it would be aided by receiving additional information from the parties regarding the effect, if any, of the Stipulation and Agreement and CenturyTel’s calling plan on numbering resources. The Commission, thereafter, ordered the parties to explain any effect on the exhaustion of telephone numbers.

2. Pursuant to the terms of the Stipulation and Agreement, the AT&T Missouri exchanges of Beaufort, St. Clair, Union, and Washington will be added to Tier 5 of the MCA Plan as established by the Commission in its Report and Order, In the Matter of the Establishment of a Plan for Expanded Calling Scopes in Metropolitan and Outstate

Exchanges, Case No. TO-92-306, December 23, 1992, and as clarified by the Commission in its Report and Order, In the Matter of an Investigation for the Purpose of Clarifying and Determining Certain Aspects Surrounding the Provisioning of Metropolitan Calling Area Service After the Passage and Implementation of the Telecommunications Act of 1996, Case No. TO-99-483, September 7, 2000 (“the MCA Orders”). If the Commission approves the Stipulation and Agreement, AT&T Missouri either has sought or will seek four 10,000 blocks of numbers, one block of which would be used in each of AT&T Missouri’s exchanges, from the North American Numbering Plan Administrator, NeuStar, Inc., (“NANPA”) to implement MCA service in its exchanges. AT&T Missouri anticipates it will retain 1,000 numbers from each of these 10,000 blocks and will donate 9,000 numbers out of each block back to NANPA. NANPA could reassign these 9,000 numbers to any switched-based CLEC that chooses to offer MCA service in these exchanges

3. Beaufort is the only AT&T Missouri exchange in the 573 NPA impacted by the Stipulation. The 573 NPA is projected to exhaust during the first quarter of 2010. Today, there are 213 available uncontaminated 10,000 blocks in the 573 NPA. Also, there are additional available 1,000 blocks that have been donated back to the pool. Due to the number of available 10,000 blocks (213), the parties anticipate the implementation of the Stipulation and Agreement will have little, if any, affect on the projected exhaust date.

4. The AT&T Missouri exchanges of St. Clair, Union, and Washington all reside in the 636 NPA. The 636 NPA is projected to exhaust during the second quarter of 2023. Today, there are 466 available uncontaminated 10,000 blocks in the 636 NPA.

Also, there are additional available 1,000 blocks that have been donated back to the pool. Due to the number of available 10,000 blocks (466), the parties anticipate the implementation of the Stipulation and Agreement will have little, if any, effect on the projected exhaust date.

5. There is an additional impact on a carrier's ability to meet number utilization thresholds for gaining new codes. MCA makes it more difficult to meet the FCC's code utilization and months-to-exhaust requirements because the MCA requires separate MCA numbers and non-MCA numbers. However, the Commission has granted waivers from NANPA's rejection of code requests as warranted by company, customer, and community needs.

6. Whereas the CenturyTel optional calling plan offered to residential customers in the CenturyTel exchanges of Foley, Holstein, Marthasville, Warrenton and Wright City does not require customers to change their existing telephone numbers, there should be no effect on either numbering resources or the exhaustion of telephone numbers.

Wherefore, Staff, OPC, and AT&T Missouri pray that the Missouri Public Service Commission approve the Stipulation and Agreement, together with any further relief the Commission deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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