

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

In the Matter of the Application of Southwestern)	
Bell Telephone Company d/b/a AT&T Missouri)	
for Review and Reversal of North American)	File No. IO-2009-0451
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff")
and for its Recommendation in this matter states as follows:

1. On June 30, 2009, Southwestern Bell Telephone Company, d/b/a AT&T Missouri, filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the form of one block of 1,000 numbers from which 700 consecutive numbers may be drawn, such that the numbers are within (1) the 314 NPA; (2) the St. Louis rate center (STLSMO01DSA); (3) an NXX other than 923; and (4) the XXXX range of 6000 through 6699 to service the needs of HealthLink, Inc. in St. Louis, Missouri. AT&T Missouri indicated that if the requested numbering resources were not available, they request numbering resources within the XXXX blocks of 2XXX, 5XXX, or 8XXX, and that those numbers conform to the remaining numbering resource needs set forth in items (1) through (3) above. The numbering resources are required in order to meet HealthLink's relocation needs for suitable numbering resources at its new address.

2. On July 2, 2009, the Commission issued an Order requiring that the Staff of the Commission shall file a recommendation regarding Southwestern Bell Telephone Company, d/b/a AT&T Missouri's application no later than July 13, 2009.

3. As stated more fully in Appendix A, attached hereto, AT&T based its request on the request of HealthLink, Inc. for 700 consecutive telephone numbers, required for the company to relocate from 12443 Olive Boulevard to 1831 Chestnut Street. HealthLink's prefers to keep its existing block of telephone numbers but change the NXX, (314) NXX-6000-6699. AT&T states there are no available blocks of one thousands telephone numbers that meet HealthLink's needs. According to Exhibit E (HC), AT&T has blocks of one thousand telephone numbers in its inventory to meet HealthLink's request. The Staff asked why those telephone numbers will not satisfy HealthLink's request, but AT&T has not responded to Staff's questions.

WHEREFORE, the Staff respectfully requests that the Commission deny AT&T's Request for Review and Reversal of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources.

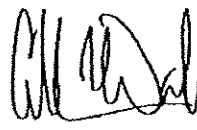
Respectfully submitted,



Colleen M. Dale
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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 13th day of July, 2009.



Cully Dale

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2009-0451
Company Name: Southwestern Bell Telephone Company d/b/a AT&T Missouri
(AT&T)

From: Sara Buyak
Telecommunications Department

William Voight 7/13/09
Utility Operations Division/Date

Subject: Staff Recommendation to Deny AT&T's Request to Override a Decision of the North American Numbering Plan Administrator

Date: July 13, 2009

Summary

On June 30, 2009, AT&T filed a request to review and reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for 1 block of one-thousand telephone numbers in the St. Louis rate center. Specifically, HealthLink, Inc. requests 700 consecutive telephone numbers in the 314-NXX within the range of 6000 through 6699. In the event the 6000-6699 is not available, HealthLink requests the 2000, 5,000, or the 8000 block.

Included in this filing is the Thousands-Blocks Application Form – Part 1 A (Part 1), a letter from HealthLink Inc., Pooling Administrator's Response/Confirmation – Part 3 Form (Part 3), Months to Exhaust Utilization Certification Worksheet, and AT&T's Number Utilization Form (Exhibit E). Staff recommends the Commission deny AT&T's request.

Background

On June 11, 2009, AT&T submitted a request to NeuStar for 1 block of one-thousand telephone numbers. On June 11, 2009, the Pooling Administrator denied AT&T's request because AT&T did not meet the months to exhaust and Utilization criteria.

Regulation 47-CFR 52.15 states, the Pooling Administrator shall withhold numbering resources from any U.S. 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.

HealthLink, Inc. stated the request for 700 consecutive telephone numbers is required for the company to relocate from 12443 Olive Boulevard to 1831 Chestnut Street. HealthLink's preference is to keep the existing block of telephone numbers it has assigned but change the NXX, (314) NXX-6000-6699. AT&T states there are no available blocks of one thousands telephone numbers that meet HealthLink's needs.

According to Exhibit E (HC), AT&T has blocks of one thousand telephone numbers in its inventory to meet HealthLink's request. The Telecommunications Department Staff (Staff) has requested to know why these available telephone numbers will not satisfy HealthLink's request, but AT&T has not provided a response to Staff's questions.

Recommendation

According to 4 CSR 240-37, the burden is on the carrier to demonstrate a verifiable need for numbering resources. Staff's review of Exhibit E (HC), AT&T's current inventory, indicates AT&T has blocks of one thousand telephone numbers to meet HealthLink's request. Also, AT&T's utilization level of 58.63% is below the required utilization level of 75% and the months to exhaust is 1208.47 which is above the required 6 months. For these reasons, AT&T has not demonstrated a verifiable need for 1 block of one-thousand additional telephone numbers in the St. Louis rate center. Staff recommends the Commission deny AT&T's request to overturn the decision of the Pooling Administrator.

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:)

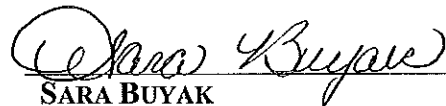
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In the Matter of the Application of)
Southwestern Bell Telephone Company) Case No. IO-2009-0451
d/b/a AT&T Missouri for Review and)
Reversal of the North American Number)
Plan Administrator's Decision to Withhold)
Numbering Resources.)

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 13th day of July, 2009.


NOTARY PUBLIC

