

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

IN THE MATTER OF THE APPLICATION OF)	
WINDSTREAM MISSOURI, INC. FOR)	
REVIEW AND REVERSAL OF THE DECISION)	CASE NO. IO-2012-0125
OF NEUSTAR, INC. AS THE POOLING)	
ADMINISTRATOR TO WITHHOLD)	
NUMBERING RESOURCES)	

SECOND AMENDED APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Windstream Missouri, Inc. (“Windstream”) and respectfully submits its second amendment to its request 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 Windstream. The purpose of this Second Amended Application is to correct and clarify the description of how the Myrtle rate center relates to Windstream’s request for additional numbering resources that is at issue here.

In support of this Second Amended Application, Windstream states as follows:

1. On October 21, 2011 Windstream filed its Application and Motion for Expedited Treatment (“Application”) in this Case. Said Application is hereby incorporated by reference except to the extent modified by herein. On November 4, 2011 Windstream filed its Amended Application and Motion for Expedited Treatment (“Amended Application”) in this Case. The Amended Application attempted to correct and further explain circumstances relating to the portion of Windstream’s request relating to the Myrtle rate center. The Amended Application is likewise incorporated by reference except to the extent modified herein.
2. As noted in both the Application and Amended Application, Windstream request for relief is prompted by the need to serve customers in its Bolivar, Doniphan, Myrtle, Morrisville and Oxly exchanges via new packet switches that are being deployed to support a broadband Stimulus project in those locations. Windstream is installing new Class 5 type packet switches, each with their own point

code and trunking/circuits, in the Bolivar and Doniphan Missouri rate centers.¹ Windstream's Morrisville and Oxly rate centers are also included in this Broadband Stimulus project, as they are remotes served under the Bolivar and Doniphan switches, respectively. While the Myrtle rate center is a host switch today, it will not have its own soft switch. Instead, Broadband Stimulus customers in the Myrtle rate center will be connected to the Doniphan soft switch over newly-constructed fiber transport and then back to the Branson tandem, the same tandem that serves legacy Myrtle customers.² The LRN and related NXX Code are required for Myrtle in order to avoid differences in rating of calls to/from customers in the Myrtle rate center as between legacy and Broadband Stimulus customers. The business plan for inclusion of the Myrtle rate center within Windstream's Broadband Stimulus proposal in Missouri is dependent on the ability to utilize the new soft switch being deployed in Doniphan to also serve Broadband Stimulus customers in the Myrtle rate center, the newly-constructed fiber transport linking the Myrtle rate center to the Doniphan end-office having made that possible. Without the LRN, it is highly unlikely that the Myrtle rate center customers could have been included in the broadband expansion.

3. The Application as amended and as explain herein demonstrates a verifiable need for the numbering resources requested herein. Windstream has exhausted all other available remedies designed to conserve numbering resources as related to this request.

4. Granting Windstream's Application, as amended, will not adversely affect the numbering resources available for use by carriers throughout the state in providing telecommunications services to their customers. Granting Windstream's request is in the public interest in that it will facilitate the expansion of broadband availability to relatively low customer-density, rural areas of Missouri and is consistent with the FCC's rules and decisions.

¹ Doniphan and Bolivar require separate soft switches (and, thus, separate LRNs) because they are separated by over 200 miles with no connecting transport facilities, home off of different tandems and are located in different LATAs.

² This corrects an error in the Amended Application, which described that the Broadband Stimulus customers in the Myrtle rate center would be served through the Sikeston tandem and that legacy Myrtle rate center customers would continue be served via the Bransom tandem. The correct description of the situation is that all Myrtle rate center customers will continue to be served via the Branson tandem, with Myrtle rate center Broadband Stimulus customer traffic connecting to the Doniphan end-office to obtain soft-switch functions and then traversing to the Branson tandem back through the Myrtle rate center. Legacy Myrtle rate center customers will continue to connect to the Bransom tandem directly.

WHEREFORE, Windstream respectfully requests that the Commission overturn and reverse Neustar's previous determination as the NANPA to the extent outlined in the Amended Application; direct Neustar to grant Windstream's applications regarding its request for the numbering resources as described therein; act within ten (10) business days as suggested by the FCC or as soon thereafter as is possible; instruct Neustar acting as NANPA to release the numbering resources as specified in the Amended Application; and grant all other proper relief to which Windstream may be entitled.

Respectfully submitted,

Windstream Missouri, Inc.

By: Edward J. Cadieux
Edward J. Cadieux MBN 29468
Director – Regulatory Counsel
Windstream Missouri
12400 Olive Blvd, Suite 430
Saint Louis, MO 63141
Telephone: (636) 537-5743
Facsimile: (330) 486-3690
E-mail: Edward.Cadieux@windstream.com

Attorney for Windstream Missouri, Inc.

VERIFICATION

STATE OF MISSOURI

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COUNTY OF SAINT LOUIS COUNTY

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I, Edward Cadieux, of lawful age, being first duly sworn upon my oath, state that I am the Director/Regulatory Counsel and that I am authorized to make this verification on behalf of Windstream Missouri, Inc.; and that the facts set forth in the foregoing pleading are true to the best of my knowledge, information and belief.

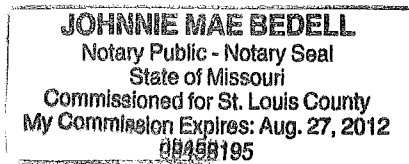
Edward J. Cadieux
(Name)

Subscribed and sworn to before me this 10th day of Nov., 2011.

Johnnie Mae Bevell
Notary Public


My Commission expires:

August 27, 2012



CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on November 10, 2011.



Edward Cadieux

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Office of the Public Counsel
P. O. Box 7800
Jefferson City, MO 65102
[opcservice @ded.mo.gov](mailto:opcservice@ded.mo.gov)