

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

In the Matter of the Application of Teleport)
Communications America, LLC for Review and)
Reversal of North American Administrator's)
Decision to Withhold Numbering Resources) **File No. CO-2025-0112**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and hereby respectfully submits this *Staff Recommendation*.

1. On September 26, 2024, the above-referenced Teleport Communications America, LLC (“Teleport” or “Company”) filed an application requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator Thousands-Block Pooling Administrator (“NANPA”) to deny the Company 3,000 consecutive numbers in the Jefferson City Rate Center. Teleport made the request in order to allow the State of Missouri to assign numbers to its individual employees.

2. On October 11, 2024, the Commission consolidated Case No. CO-2025-0112 with Case No. XO-2025-0113 with Case No. CO-2025-0112 being the lead case.

3. Rule 20 CSR 4240-28.016 requires a carrier that requests the Commission to overturn a decision of NANPA to deny a carrier’s request for additional numbering resources to file an application with the Commission to meet certain criteria.

4. As explained in Staff’s Memorandum, attached hereto as Appendix A, Staff conducted an investigation into Teleport’s application for compliance with the Commission’s rules and federal requirements. Based on its review, Staff recommends

the Commission approve Teleport's application and order a reversal of the NANPA decision to deny the 3,000 consecutive numbers for the State of Missouri.

WHEREFORE, Staff recommends that the Commission grant Teleport Communications America, LLC request for 3,000 consecutive numbers within the 573 or 235 NPA and the Jefferson City rate center and grant such other and further relief as it finds just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 16th day of October, 2024, to all counsel of record.

/s/ Ron Irving

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. CO-2025-0112

From: Kari Salsman, Senior Research/Data Analyst
John VanEschen, Regulatory Compliance Manager
Telecommunications Department

Subject: Staff's Recommendation to Approve Teleport Communications
America, LLC's Request for Additional Numbering Resources to
Accommodate the Needs of the State of Missouri in the Jefferson City
Rate Center

Date: October 16, 2024

On September 26th, Teleport Communications America, LLC (Teleport) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny the request of Teleport for additional telephone numbering resources in the Jefferson City rate center. According to Teleport, the State of Missouri is assigning numbers to its individual employees and is in need of 3,000 consecutive numbers in the 573 or 235 Numbering Plan Area (NPA) in the Jefferson City rate center to accommodate its plan.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Jefferson City rate center to meet the needs of the State and requests the Commission to override the NANPA's denial of Teleport's request for the additional telephone numbers. Denial was based on Teleport's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Teleport may very well have available telephone numbers to assign the State; however, said numbers are not in sequential order, which is necessary to work with the State's communications plan.

In support of its Application, Teleport provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Teleport provided Staff confidential copies of its telephone number utilization for the Jefferson City rate center. The Staff has examined the request and supporting documentation and in the Staff's opinion, Teleport's application complies with the requirements of 20 CSR 4240-28.016 and Teleport has demonstrated a verifiable need for the additional telephone numbers. Staff also notes the current forecasted exhaust date for the 573 & 235 NPAs is beyond 40 years.¹ Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for the State.

¹ The new 235 area code was introduced in the 573 area code. NANPA no longer conducts a forecast solely for the 573 area code but rather combines the 573 and 235 area codes.

Specifically, the Staff recommends the Commission's order include statements substantially similar to the following:

Grant Teleport's request for 3,000 consecutive numbers within the 573 or 235 NPA and the Jefferson City rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.