

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

In the Matter of the Application of MCImetro Access)
Transmission Services Corp d/b/a Verizon Access)
Transmission Services for Review and Reversal of North)
American Number Plan Thousands-Block Pooling)
Administrator’s Decision to Withhold Numbering)
Resources)

Case No. _____

**MCIMETRO ACCESS TRANSMISSION SERVICES CORP
D/B/A VERIZON ACCESS TRANSMISSION SERVICES’
APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

MCImetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services (a/k/a OCN 7432 “MCI WORLDCOM COMMUNICATIONS, INC – MO”; hereinafter referred to as “Verizon Access”) files this application pursuant to 20 CSR 4240-2.060, 20 CSR 4240-2.080, 20 CSR 4240-28.016, and 47 C.F.R. § 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission (“Commission”) issue an order, on an expedited basis, that reviews and reverses the recent decision of the North American Numbering Plan Thousands-Block Pooling Administrator (“PA”) to withhold certain numbering resources from Verizon Access.

The requested numbering resources are necessary to meet the telecommunications needs of Verizon Access’ customer, U.S. Department of Agriculture (“USDA”), in St. Louis, Missouri. USDA needs 1,500 contiguous Direct Inward Dialing (“DID”) numbers in NPA 314’s St. Louis rate center to implement new phone service to their Microsoft Teams environment via direct routing. On March 30, 2023 the PA rejected Verizon Access’ request for the necessary numbering resources. Verizon Access requests that if the specific resources are not available

when the Commission issues its order, that it direct the PA to provide such resources as are available to meet USDA's numbering needs.

In support of its Application, Verizon Access states as follows:

1. Verizon Access is a Delaware corporation with its principal office at One Verizon Way, Basking Ridge, NJ 07920. It may be contacted via its attorney of record reflected in Paragraph 3 below.

2. Verizon Access is duly authorized to conduct business in Missouri,¹ with its fictitious name duly registered with the Missouri Secretary of State.² Verizon Access is a "local exchange telecommunications company," "alternative local exchange telecommunications company" and "public utility" certificated by this Commission³ and duly authorized to provide "telecommunications service" within the state of Missouri, as each of these terms is defined in Section 386.020, RSMo.

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

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¹ A certified copy of Verizon Access' Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on October 21, 2013 in Case No. LO-2014-0102. Verizon Access has since converted from an LLC into a corporation. See MCImetro Access Transmission Services Corp.'s Certificate of Authority from the Missouri Secretary of State, filed with the Commission on November 14, 2016 in File No. LN-2017-0142.

² A copy of the registration of the fictitious name Verizon Access Transmission Services was filed with the Commission on December 23, 2005 in Case No. LN-06-276.

³ The Commission most recently expanded Verizon Access' certificate of service authority in its September 25, 2008 order in Case No. TA-2009-0083.

And

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4. As mentioned above, this Application is prompted by USDA's plan to implement new phone service to their Microsoft Teams environment via direct routing. This plan requires 1,500 contiguous DID numbers in NPA 314's St. Louis rate center. USDA placed an order with Verizon Access for the 1,500 contiguous DID numbers with a planned in-service date of July 1, 2023. See **Exhibit A** hereto, which is a true and correct copy of USDA's March 21, 2023 letter to Verizon Access, explaining USDA's business needs.

5. If USDA cannot obtain the requested 1,500 contiguous DID numbers, it will impact its ability to implement its desired dial plan and adversely affect its ability to implement the upgrade to its Microsoft Teams environment via direct routing as planned. The inability to complete the planned upgrade will greatly affect the efficiency of work operations at its St. Louis location. See **Exhibit A**.

6. Because Verizon Access lacked a 1,500 block of contiguous DID numbers in NPA 314 with which to meet USDA's needs, on March 31, 2023, it submitted a request to the PA for two contiguous thousands blocks in the St. Louis Missouri rate center, along with the necessary Months to Exhaust and Utilization Certification Work Sheet. A true and correct copy of Verizon Access' request is attached hereto as **Exhibit B**. The accompanying months-to-exhaust worksheet, which is trade secret and confidential, is attached hereto as **Confidential**

Exhibit C. As required by 20 CSR 4240-28.016, Verizon Access' FCC Form U1 of Form 502, which is also trade secret and confidential, is attached as **Confidential Exhibit D.**

7. On March 31, 2023, the PA denied the request on the grounds that Verizon Access had not met the utilization and/or months-to-exhaust criteria established by the Federal Communications Commission ("FCC"). A true and correct copy of the PA's decision is attached hereto as **Exhibit E.**

8. Verizon Access seeks the Commission's direction to overturn the PA's decision to withhold numbering resources, as Verizon Access has now exhausted all other available remedies designed to conserve numbering resources. The Commission has previously overturned decisions of the PA upon facts similar to those in this Application.

9. A state commission may overturn the PA's decision based on the Commission's determination that the carrier has demonstrated a verifiable need for the requested numbering resources and has exhausted all other available remedies. *See* 47 C.F.R. § 52.15(g)(4). Similarly, the FCC has held that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." *See* Third Report and Order and Second Order on Reconsideration, *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*, 17 FCC Rcd 252 (rel. Dec. 28, 2001) at ¶ 64 ("*12/28/01 Order*"). State commissions are permitted to grant such requests provided they are for customers seeking contiguous blocks of numbers, rather than "vanity numbers." *Id.*

10. In this case, USDA requires two thousands blocks of contiguous DID numbers in NPA 314, in the St. Louis rate center. Granting this application will benefit the public interest

because it will ensure the new phone service is completed to USDA's improved Microsoft Teams environment so the USDA is better able to serve its employees, constituents, and consumers.

11. Verizon Access respectfully requests that the Commission act upon this Application within ten (10) business days. Verizon Access has acted expeditiously to engage counsel and file for the requested relief, and the FCC has recognized the importance of timely state commission action:

[W]e recognize that in many instances, the failure to address a request for additional numbering resources can impair a carriers' ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as expeditiously as possible. Although we do not establish a specific time limit for states to act on these requests, we believe that, in most instances 10 business days from receipt of a request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests.⁴

12. This Application satisfies the requirements of 20 CSR 4240-28.016 by providing all required documentation outlined therein.

13. Verizon Access does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency, which involves customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application.

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

15. Verizon Access seeks expedited treatment and requests that the Commission act on this request within ten (10) business days, so that Verizon Access will have enough time to file a new request with the PA for the release of the numbering resources described herein.

⁴ See 12/28/01 Order at ¶ 66.

WHEREFORE, Verizon Access respectfully requests that the Commission overturn the PA's previous determination in this matter within ten (10) business days, and instruct the PA to release the numbering resources necessary to meet the USDA's plans to upgrade its phone service to their Microsoft Teams environment via direct routing, enabling the USDA to better serve its customers. Verizon Access further requests that if the specific resources are not available when the Commission issues its order, that it direct the PA to provide such resources as are available to meet USDA's numbering needs.

Respectfully submitted,

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*Attorneys for MCI metro Access Transmission
Services Corp d/b/a Verizon Access Transmission
Services*

Dated: May 5, 2023

CERTIFICATE OF SERVICE

Copies of the foregoing Application and all attachments thereto were served on the following by e-mail on May 5, 2023.

Anne E. Callenbach

Nancy Dippell
Secretary
Missouri Public Service Commission
P.O. Box 360
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nancy.dippell@psc.mo.gov

VERIFICATION

I, Anne E. Callenbach, in accordance with 4 CSR 240-2.060(1)(M) and first being duly sworn upon my oath, hereby state that I am over the age of twenty-one, am sound of mind, am an attorney for MCImetro Access Transmission Services Corp d/b/a Verizon Access Transmission Services, and am authorized to act on its behalf. I have read the foregoing document to which this Verification is appended and the facts contained therein are true to the best of my knowledge, information and belief.

Anne E. Callenbach