

**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	)	<u>File No. IO-2013-0090</u>
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 August 28, 2012, 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 St. Louis, Missouri rate center. More specifically, the requested resources consist of one thousands-block from which 500 consecutive numbers may be drawn that are within (1) the 314 NPA, (2) an XXXX range from 1000 through 7999, and (3) the St. Louis rate center, to meet the needs of the St. Louis Cardinals.

2. AT&T Missouri states that it does not have the numbers available for assignment in the St. Louis rate center to meet the needs of the St. Louis Cardinals. NANPA denied AT&T's request for the additional telephone numbers based on AT&T's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers to assign to the St. Louis Cardinals; however, said numbers are not in sequential order.

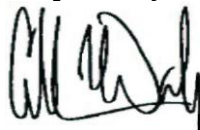
3. AT&T Missouri provided the Staff with its telephone number utilization for the St. Louis rate center. The Staff has examined AT&T Missouri's request and supporting documentation. In the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for the St. Louis Cardinals.

WHEREFORE, the Staff recommends that the Commission issue an order that:

- (1) Determines AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2) Overturns the decision of the Pooling Administrator and grants AT&T Missouri's request for telephone numbers in the Lee's Summit rate center, and
- (3) Contains the following language:

AT&T Missouri's request for one thousands-block within the 314 NPA, an XXXX range from 1000 through 7999, in the St. Louis, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

Respectfully submitted,



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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 6th day of September, 2012.

A handwritten signature in black ink, appearing to be "All Day".

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2013-0090

From: Kari Salsman
William Voight
Telecommunications Department

Subject: Staff's Recommendation to Approve AT&T Missouri's Request for Additional Numbering Resources to accommodate the needs of the St. Louis Cardinals in the St. Louis rate center.

Date: September 4, 2012

On August 28th, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny AT&T Missouri's request for additional telephone numbering resources in the St. Louis, Missouri telephone rate center (Application). According to AT&T Missouri, the St. Louis Cardinals have expanded their staff since they implemented the Cisco phone system in 2004 and require additional lines for added growth. They wish to maintain their current four digit dialing pattern and the phone system will not accept blocks beginning with 0, 8 or 9. To accommodate its needs, St. Louis Cardinals is in need of 500 consecutive numbers to serve the Cardinals' expanding telecommunications needs. More specifically, the requested resources consist of one thousands-block from which 500 consecutive numbers may be drawn that are within (1) the 314 NPA, (2) an XXXX range from 1000 through 7999, and (3) the St. Louis rate center.

According to its Application, AT&T Missouri states that it does not have the numbers available for assignment in the St. Louis rate center to meet the needs of the Cardinals. AT&T Missouri requests the Commission to override the NANPA's denial of AT&T Missouri's request for the additional telephone numbers, which denial was based on AT&T Missouri's inability to meet the guidelines pertaining to current telephone number utilization. In other words, AT&T Missouri may very well have the available telephone numbers to assign to the Cardinals; however, said numbers are not in sequential order.

In support of its Application, AT&T Missouri provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, AT&T Missouri provided Staff highly confidential copies of its telephone number utilization for the St. Louis rate center. The Staff has examined AT&T Missouri's request and supporting documentation.

The Staff has examined AT&T Missouri's request and in the Staff's opinion, AT&T Missouri has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve AT&T Missouri's request and order a reversal of the NANPA decision to deny the additional numbers for St. Louis Cardinals.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

AT&T Missouri's request for one thousands-block within the 314 NPA, an XXXX range from 1000 through 7999, in the St. Louis, Missouri rate center is granted. The Commission further determines that if a new code is required to be opened for this occasion, AT&T Missouri shall utilize one block of one thousand numbers and return the remaining nine blocks to the Pooling Administrator.

Under penalty of perjury, I affirm that the above statement is true and correct.



KARI SALSMAN