

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

In the Matter of the Application of Teleport	)	
Communications of America, LLC for	)	
Review and Reversal of North American	)	<b><u>File No. LO-2015-0229</u></b>
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 March 24, 2015, Teleport Communications of America, LLC 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 Teleport in the Lee's Summit, Missouri rate center. More specifically, the requested resources consist of one 1000-block of consecutive numbers to meet the needs of the City of Lee's Summit.

2. Teleport states that it does not have the numbers available for assignment in the Lee's Summit rate center to meet the needs of the City of Lee's Summit. NANPA denied Teleport's request for the additional telephone numbers based on Teleport's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Teleport may very well have the available telephone numbers to assign to the City of Lee's Summit; however, said numbers do not meet the required criteria.

3. Teleport provided the Staff with its telephone number utilization for the Lee's Summit, Missouri rate center. The Staff has examined Teleport's request and supporting documentation. In the Staff's opinion, Teleport has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for Columbia Public Schools.

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

(1) Determines Teleport 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 Teleport's request for telephone numbers in the Lee's Summit, Missouri rate center, and

(3) Contains the following language:

The Commission grants Teleport's request for one (1) one-thousand block of numbers within the Lee's Summit, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.

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 3<sup>rd</sup> day of April, 2015.



# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. LO-2015-0229

**From:** Kari Salsman  
Telecommunications Unit  
John VanEschen  
Tariff, Safety, Economic and Engineering Analysis

**Subject:** Staff's Recommendation to Approve Teleport Communications of America's Request for Additional Numbering Resources to accommodate the needs of the City of Lee's Summit in the Lee's Summit rate center.

**Date:** March 27, 2015

On March 24<sup>th</sup>, Teleport Communications of 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 Teleport's request for additional telephone numbering resources in the Lee's Summit, Missouri telephone rate center (Application). According to Teleport, the City of Lee's Summit (City) is expanding and upgrading its communications system. The City is migrating its legacy voice services to a Session Initiation Protocol based unified communications system. As part of this technology upgrade, the City is in need of one thousand consecutive numbers, preferable within the same 1000 block of numbers.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Lee's Summit rate center to meet the needs of the City. Teleport requests the Commission to override the NANPA's denial of Teleport's request for the additional telephone numbers, which 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 the available telephone numbers to assign to the City; however, said numbers are not in sequential order.

In support of its Application, Teleport provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, Teleport provided Staff highly confidential copies of its telephone number utilization for the Lee's Summit rate center. The Staff has examined Teleport's request and supporting documentation.

The Staff has examined Teleport's request and in the Staff's opinion, Teleport's application complies with the requirements of 4CSR240-37.040. Teleport has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Teleport's request and order a reversal of the NANPA decision to deny the additional numbers for the City.

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

Grant Teleport's request for one (1) one-thousand block of numbers within the Lee's Summit, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying Teleport's original request.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined Teleports's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

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

A handwritten signature in cursive script, reading "Kari Salsman", is positioned above a horizontal line.

KARI SALSMAN