BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Southwestern Bell Telephone Company d/b/a AT&T Missouri for Review and Reversal Of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources

Case No. _____

AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW AT&T Missouri¹ and respectfully requests 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 AT&T Missouri.

The requested numbering resources are necessary to meet the telecommunications needs of Liberty Hospital ("Liberty"), located in Liberty, Missouri. These resources consist of two thousands-blocks, which would yield 2,000 numbers needed to serve Liberty's expanding telecommunications needs. More specifically, the requested resources consist of two thousands-blocks within (1) the 816 NPA and (2) the Liberty rate center.

In support of this Application, AT&T Missouri states as follows:

1. AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. AT&T Missouri is authorized to do business in

¹ Southwestern Bell Telephone Company dba AT&T Missouri ("AT&T Missouri"). AT&T Missouri files this verified Application and motion for expedited treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv).

Missouri² and its fictitious name is duly registered with the Missouri Secretary of State.³ AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo 2000.⁴

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

Jeffrey E. Lewis Leo J. Bub Robert J. Gryzmala Attorneys for Southwestern Bell Telephone Company d/b/a AT&T Missouri One AT&T Center, Room 3516 St. Louis, Missouri 63101

3. This Application is prompted by Liberty's previous growth and its expected continued expansion, and is based on Liberty's plan to re-configure its telecommunications infrastructure in its location at 2525 Glenn Hendren Drive in Liberty. As a result, Liberty is in need of additional numbering resources. A letter from Mr. Joseph W. Crossett, Liberty's Administrator, details the specific numbering resources needed by Liberty. *See*, Exhibit A, attached hereto. As the letter indicates, Liberty "has expanded considerably over the last several years (and further expansion is expected)." The letter further notes that Liberty currently "uses four different prefixes" and that this configuration "is cause for much confusion not only to our

² In accordance with 4 CSR 240-2.060(1) and (G), a certified copy of Southwestern Bell Telephone Company's Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044.

³ In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

⁴ Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company d/b/a AT&T Missouri. *See*, <u>Order Granting Expedited Treatment and Approving Tariffs</u>, Case No. TO-2002-185, issued June 29, 2007.

staff, but to the community at large." Consequently, Liberty needs "2,000 consecutive [Direct Inward Dial] telephone numbers." *Id.* Finally, if this Application is granted, Liberty will return to AT&T Missouri "all existing DID telephone numbers" to AT&T Missouri, excepting 816-781-7200." *Id.* AT&T Missouri understands that this return would approximate about 1,600 telephone numbers.

4. AT&T Missouri has researched the available numbering resources in the Liberty rate center and has determined that it has no numbers available to meet Liberty's needs.

5. Consequently, AT&T Missouri requests that the Commission grant it numbering resources consisting of two thousands-blocks within (1) the 816 NPA and (2) the Liberty rate center.

6. On August 17, 2010, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Liberty's needs. A copy of the Application is attached hereto as Exhibit B. AT&T Missouri completed the Application in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet, a copy of which is attached hereto as Exhibit C.

7. On August 17, 2010, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization and/or months-to-exhaust criteria. A copy of that decision is attached hereto as Exhibit D.

8. AT&T Missouri seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases and AT&T Missouri respectfully submits that it should likewise do so here.

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9. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000, <u>Order</u> in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources.⁵ Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁶ Moreover, the FCC determined that states may overturn NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁶ Moreover, the FCC determined that states may overturn NANPA's decision to withhold numbering resources from the carrier based for the carrier to satisfy a specific customer request:

We also agree with WinStar 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. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.⁷

10. The FCC further explained in its March 31, 2000, <u>Order</u> that a "[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers."⁸ Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated "in most

⁵ <u>Report and Order and Further Notice of Proposed Rule Making</u>, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv). ⁶ *Id*.

⁷ <u>Third Report and Order and Second Order on Reconsideration</u>, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, et al., December 12, 2001, paragraph 64; *see also*, 47 CFR 52.15(g)(4). ⁸ *Id*.

instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests."⁹

11. Further, this Application complies with 4 CSR 240-37.040. AT&T Missouri has attached hereto its "Months-to-Exhaust Worksheet" indicating the utilization for the Liberty rate center encompassing both the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-37.040(1)(A)1. *See*, Exhibit C. AT&T Missouri has also attached hereto its most recently-filed FCC Form U1 of Form 502 for this rate center. 4 CSR 240-37.040(1)(A)2. *See*, Exhibit E(HC). Finally, AT&T Missouri attaches copies of its originally-filed request to NANPA (i.e., its Thousands-Block Application Form, Part 1A) and NANPA's denial of that request. 4 CSR 240-37.040(1)(A)3. *See*, Exhibits B and D, respectively. These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, AT&T Missouri has exhausted all other available remedies designed to conserve numbering resources. 4 CSR 240-37.040(1)(A)4.

12. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court which involve retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application. AT&T Missouri has one pending action against it, brought by end-user customers, which involves retail customer service or rates.¹⁰

13. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.

14. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within thirty (30) days. Liberty has indicated that its implementation timeframe is

⁹*Id*. at paragraph 66.

¹⁰ Barry Road Associates, Inc. d/b/a Minsky's Pizza, et al. v. Southwestern Bell Telephone Company, d/b/a AT&T Missouri, et al., Case No. 1016CV02438, Jackson County Circuit Court.

nearing. In order to accommodate Liberty's needs, the Commission must issue its order expeditiously, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of the numbering resources to AT&T Missouri described herein. AT&T Missouri filed this request for expedited treatment as soon as it could have after NANPA rejected AT&T Missouri's request for numbering resources and AT&T Missouri determined that it was not feasible to implement a technological alternative.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter within thirty (30) days, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Liberty Hospital.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Robert J. Fry zmela

JEFFREY E. LEWIS #62389 LEO J. BUB #34326 ROBERT J. GRYZMALA #32454 Attorneys for Southwestern Bell Telephone Company d/b/a AT&T Missouri One AT&T Center, Room 3516 St. Louis, Missouri 63101 314-235-6060 (tn)/314-247-0014 (fax) robert.gryzmala@att.com

CITY OF ST. LOUIS)) SS STATE OF MISSOURI)

VERIFICATION

I, Alan G. Kern, in accordance with 4 CSR 240-2.060(1)(M), first being duly sworn upon my oath, hereby verily state that I am over the age of twenty-one years, sound of mind, and am authorized to act on behalf of Southwestern Bell Telephone Company, d/b/a AT&T Missouri regarding the foregoing document. I have read the document to which this Verification is appended. The facts contained therein are true and correct according to best of my knowledge, information and belief.

Alan G. Kern

Sworn and subscribed to before me this 24th day of August, 2010.

Notary Public



CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by email on August 24, 2010.

Robert J. Suggmala Robert J. Gryamala

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

Exhibit A



P.O. Box 1002 • Liberty, Missouri 64069-1002 • (816) 781-7200

June 2, 2010

Via email to: cm2133@att.com Cecilia Middleton Communication Consultant AT&T Business Solutions Customer Care AT&T Oklahoma

Dear Ms. Middleton:

As per your recent conversation and follow-up e-mails with Bill Hughes regarding the New Liberty Hospital District's (a/k/a Liberty Hospital) request (and subsequent denial) to evaluate the transition to 2,000 consecutive telephone numbers; this letter acts as our submission for a Safety Valve Request. Liberty Hospital is aware that there is no guarantee the request shall be granted, and that the timeframe could be 66+ days.

Liberty Hospital campus, located at 2525 Glenn Hendren Drive in Liberty, Missouri, has expanded considerably over the last several years (and further expansion is expected). Currently the hospital uses four different prefixes in the various departments and it is cause for much confusion not only to our staff, but to the community at large. Liberty Hospital wants to retain the current main telephone number of (816) 781-7200.

We are requesting a Safety Valve Request for a block of 2,000 consecutive DID telephone numbers. There are no digit restrictions. If this request is granted and accepted by Liberty Hospital, all existing DID telephone numbers [with the exception of (816) 781-7200] in use by Liberty Hospital, will be returned to AT&T.

Sincerely, syster . The

Joseph W. Crossett Administrator

JWC:kp

Tracking Number: _____

Thousands-Block Application Form Part 1A

Type of Application (check one):	X New	🗆 Change ⁱ	Disconnect
			= = = = = = = = = = = = = = = = = = = =

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: SOUTHWESTERN BELL Headquarters Address: 2600 Camino Ramon City San Ramon State CA Zip 94583 Contact Name: Connie McNaughton Contact Address: 2600 Camino Ramon, 2S750MM City San Ramon State CA Zip 94583 Phone: 925-824-5627 Fax: 707-435-6386 E-Mail: cm3123@att.com

Pooling Administratorⁱⁱ: Contact Name: **GENEVIEVE BETTIGA** Contact Address: **1800 SUTTER STREET, Suite 571** City **CONCORD** State **CA** Zip **94520** Phone: **925-363-7652** Fax: 925-363-7683 E-Mail: Kevin.gatchell@neustar.biz

1.2 General Information

Check one: No LRN needed _____ LRN neededⁱⁱⁱ_____

NPA: <u>816</u> LATA: <u>524</u> OCN^{iv}: <u>9533</u> Parent Company's OCN <u>9533</u> Number of Thousands-Blocks Requested: <u>2</u>

Switch Identification (Switching Entity/POI)^v: <u>KSCYMO42DS0</u> City or Wire Center Name Rate Center^{vi}: <u>LIBERTY</u> Rate Center Sub Zone: ______

1.3 Dates

Date of Application^{vii}: <u>08/17/2010</u> Requested Block Effective Date^{viii}: <u>EXPEDITE</u> Request Expedited Treatment? (See Section 8.6) Yes <u>X</u> No ____

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: ILEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: WIRELINE
- c) Thousands-Block(s) (NXX-X) assignment preference (optional) <u>CONSECUTIVE</u>
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any ___
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) ______.

1.5 Type of Request

Initial block for rate center: Yes____, If Yes attach evidence of authorization and proof of capability to provide

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007 ATIS-0300066.at1

Thousands-Block Application Form Part 1A

Service within 60 days

Growth block for rate center: Yes \underline{X} , If Yes, attach months to exhaust worksheet

Change block: Yes _____, If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect block: Yes_____, If Yes, list NPA-NXX-X ______

Remarks: <u>SAFETY VALVE WAIVER REQUEST FOR LIBERTY HOSPITAL.</u>

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066.

Connie McNaughton	CODE ADMINISTRATOR	August 17, 2010
Signature of Block Applicant	Title	Date

Thousands-Block Application Form Part 1A

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN)are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^{ix}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: _____

Thousands-Block Application Form Part 1A

Foot Notes:

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

iii A CO Code application will also need to be submitted to the PA

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

Appendix 3 - Modified August	MONTHS TO EXI	IAUST and sands-Bloc						– TN Leve	l 1	I	Exhibit C
Date: 08/17/2010 OCN: 9533	Company Nar	ne: <u>AT&T</u>	-SOUTHV	VEST							
Rate Center: LIBERTY											
List all Codes NPA(s)-NXXs and Blocks	s NPA(s)-NXX-X(s): <u>NPA-</u>	NXX()		-X ()						
Name of Block Applicant: <u>CONNIE M</u>	ICNAUGHTON	Signature:	SIGNA		FILE			_			
Title: CODE ADMINISTRATOR T	elephone No.:	(925) 824-50	<u>627</u> FA	X No.:	<u>(707) 435</u>	-6386	_E-Mail:_	cm3123	@att.com		
A. Available Numbers: <u>14675</u>	-										
B. Assigned Numbers: <u>35022</u>											
C. Total Numbering Resources:	99										
D. Quantity of numbers activated in the List excluded Code(s) or Block(s): _		d excluded	from the U	Itilization	calculation	: <u>0</u>					
	Month Montl #1 #2	n Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months ²	<u>-139 -240</u>	<u>-133</u>	<u>-271</u>	<u>-134</u>	<u>-145</u>						
F. Forecast – Next 12 months ³	<u> </u>	<u>2001</u>	<u>49</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	_0	0	0	_0
G. Average Monthly Forecast (Sum of months	s #1-6 (Part F above)	divided by 6):	336.16	7							
H. Months to Exhaust ⁴	Num	<u>ibers Available</u> Average	e for Assignm e Monthly Fo		omers (A)		=	43.654	1		
I. Utilization ⁵		<u>d Numbers (B)</u> ring Resource				* 100	=	68.672	%		
Explanation: - Actual Value M1(- 380)	Actual Value M4	(-46) Actua	I Value M	5(-148) <i>A</i>	ctual Valu	ue M6(-1	08) Actual	Value M7	'(-106)		

Actual Value M8(-59) Actual Value M9(-82) Actual Value M10(-100) Actual Value M11(-86) Actual Value M12(-88) SAFETY VALVE REQUEST. Dedicated Customer LIBERTY HOSPITAL.

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

² Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

⁵ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

rans

From:	genevieve.bettiga@neustar.biz Exhibit D
Sent:	Tuesday, August 17, 2010 2:48 PM
То:	GESCAT, SUZANNE S (ATTPB); PANOPIO, LOURDES B (ATTPB); MOSELEY, PATRICIA A
	(ATTOPS); MC NAUGHTON, CONNIE S (ATTOPS)
Cc:	PA_Part3@neustar.biz
Subject:	PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 816-
	LIBERTY-MO-381937

Page 1 of 2

Pooling Administration System

Dated 17 August 2010

November 21, 2003 ATIS-0300066.at3			Attachmer
	ooling Administrator's Re TBPAG P		
Tracking Number :	816-LIBERTY-MO- 381937	_	
Date of Application:	08/17/2010	Effective Date:	
Date of Receipt:	08/17/2010	Date of Response:	08/17/2010
Service Provider Name:	SOUTHWESTERN	BELL	
(Telcordia TM LERG TM Routing Guide) OCN:	9533		
NPAC SOA SPID :			
Pooling Administrator Co Genevieve Bettiga Signature of Pooling Admin Genevieve Bettiga	Phone:		925-363-7652
Name (print)	I ax.		923-303-7083
Email:	genevie	eve.bettiga@neustar.t	<u>biz</u>
NPA-NXX or NPA- NXX-X :		Block Assigned	d:
		Block Reserved	l:
		Block Reservati Expiration Date :	ion
		Block/Code Mo	dified :
		Block/Code Disconnected :	
Block Contaminated()			
If Yes,enter the number	er of TNs contaminated :		
Switch Identification(St	witch Entity/POI): 1	KSCYMO42DS	60

Rate Center:

Rate Center Sub Zone:

X Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

LIBERTY

____ Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia,LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies,Inc.)

neustar

Exhibit E(NP)

EXHIBIT E

IS

HIGHLY CONFIDENTIAL

IN ITS ENTIRETY