

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Application of CenturyTel)	
of Missouri, LLC For Review and Reversal of North)	
American Number Plan Thousands-Block Pooling)	Case No. _____
Administrator's Decision to Withhold Numbering)	
Resources.)	

CENTURYTEL OF MISSOURI, LLC'S APPLICATION AND
MOTION FOR EXPEDITED TREATMENT

COMES NOW CenturyTel of Missouri, LLC (CenturyTel) 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 CenturyTel. CenturyTel 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). The requested numbering resources are necessary to meet the needs of Fort Zumwalt School District (Fort Zumwalt) as it seeks to simplify its dialing pattern as it deploys a new telecommunications system. The resources requested consist of two consecutive, thousands-block within the NPA-NXX of 636-542, with the specific ranges of 5000 to 6999 or 6000 to 7999 requested.¹

In support of this Application, CenturyTel states as follows:

1. CenturyTel is a Louisiana limited liability corporation that is duly authorized to do business in the State of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of CenturyTel's Certificate of Authority to transact business in Missouri from the

¹ Line range cannot begin with 0 or 9.

Missouri Secretary of State were filed in Case No. TM-2002-232², and are incorporated herein by reference pursuant to 4 CSR 240-2.060(1)(G).

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

Linda K. Gardner
5454 W. 110th Street
Overland Park, KS 66211
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3. There are no pending actions or final unsatisfied judgments or decisions against CenturyTel from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.
4. Fort Zumwalt is in the process of implementing a more efficient telecommunication system designed to better meet the needs of its employees, parents, students and community. As part of this upgrade, it will be deploying a new system comprised of 35 phone switches, with a planned "live" launch of the system at the end of September 2009. A sequential set of Direct Inward Dial (DID) numbers is requested in order to simplify the dialing plan used.³
5. With the upgrade, Fort Zumwalt will need to add 2000 DID numbers to its 400 existing DID numbers, for a total of 2400 DID numbers. The current DID

² In the Matter of the Joint Application of GTE Midwest Incorporated, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri; 2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) to Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) to Designate CenturyTel of Missouri, LLC, as a Telecommunications Carrier Eligible to Receive Federal Universal Support, Case No. TM-2002-232.

³ A copy of the Customer Request to CenturyTel is attached hereto and marked as Exhibit A.

numbers are divided between several prefixes as DID numbers were added and assigned when needed based on then current availability. Given the need for an additional 2000 DID numbers and the installation of the new phone system, combining the DID numbers into a sequential numbering plan will be more efficient, easier to use and more responsive for staff use and incoming callers.

6. CenturyTel has researched the available blocks in its O'Fallon rate center (OFLNMOXADSO) which serves this customer. CenturyTel has no thousands-blocks available for use from which to draw the requested numbering resources that would meet Fort Zumwalt's needs. As a result of this research, CenturyTel requests that the Commission grant it numbering resources with the NPA-NXX of 636-542, with line ranges of 5000 to 6999 or 6000 to 7999.
7. On June 25, 2009, CenturyTel submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Fort Zumwalt's needs.⁴ CenturyTel completed the Thousands-Block Application Form 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.⁵
8. On or about June 25, 2009, NANPA denied the requests on the grounds that CenturyTel had not met the utilization criteria.⁶

⁴ A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

⁵ A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

⁶ A copy of those decisions are attached hereto and marked as Exhibit D.

9. CenturyTel 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 where customers have required a large amount of sequential numbers and it should likewise do so here.
10. 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 *Order* 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.⁷ 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."⁸ Moreover, the FCC determined that states may overturn NANPA's decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request.⁹
11. The FCC further explained in its March 31, 2000 *Order* that a "[c]arrier may demonstrate such a need by providing the state with documentation of the

⁷ *Report and Order and Further notice of proposed Rule Making*, In the Matter of numbering Resource optimization, CC Docket No. 99-200, rel March 31, 2000, Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

⁸ *Id.*

⁹ *Third Report and Order and Second Order on Reconsideration*, in the matter of numbering Resource optimization, CC Docket No. 99-200, et al, rel. December 28, 2001, para. 64; *see also*, 47 CFR 52.15(g)(4).

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.”¹⁰ Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated “in most 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.”¹¹

12. Further, this Application complies with 4 CSR 240-37.040. CenturyTel has attached hereto its “Months to Exhaust Worksheet” indicating the utilization for the O’Fallon rate center encompassing the preceding six months and projected monthly utilization for the next twelve months.¹² CenturyTel has also attached its most recently filed FCC Form U1 of Form 502 for the O’Fallon rate center.¹³ Finally, CenturyTel attaches copies of its originally-filed requests to NANPA and NANPA’s denial of those requests.¹⁴ These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyTel has exhausted all other available remedies designed to conserve numbering resources.
13. CenturyTel seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. Fort Zumwalt plans a live cut over of its system at

¹⁰ *Id.*

¹¹ *Id.*, at para. 66.

¹² See Exhibit C.

¹³ The portions of FCC Form U1 of Form 502 pertaining to the O’Fallon rate center are attached hereto and marked as Exhibit E (HC) as it contains exchange specific customer numbers.

¹⁴ See Exhibits B and D.

the end of September. In order to accommodate Fort Zumwalt's needs, the Commission must issue its order as soon as possible so that CenturyTel will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyTel described herein, both to meet Fort Zumwalt's needs but also so that CenturyTel and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely basis. CenturyTel filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

WHEREFORE, CenturyTel respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Fort Zumwalt School District.

Respectfully Submitted,



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Attorney for CenturyTel of Missouri, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of September 2009, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

Steve Reed
General Counsel
Missouri Public Service Commission
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Mike Dandino
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VERIFICATION

STATE OF)
) ss.
COUNTY OF)

I, Arthur Martinez, of lawful age, and being first duly sworn, now state: I am Director of Government Relations for the South Central Region for CenturyTel, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief.


Arthur P. Martinez

Subscribed and sworn to before me this 4th day of September, 2009.


Notary Public

My Appointment Expires:

