

**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) **File No. IO-2013-0323**
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 December 4, 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 200 consecutive numbers may be drawn that are within (1) the 314 NPA, (2) an XXXX within the range from 3500 through 3699 through 7999, and (3) the St. Louis rate center, to meet the needs of the First Bank’s disaster recovery configuration requirements.

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 First Bank. 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 First Bank; 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 St. Louis 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 3500 through 3599 and 3600 through 3699, 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 12th day of December, 2012.

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

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IO-2013-0323

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 First Bank
in the St. Louis rate center.

Date: December 10, 2012

On December 4th, 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, First Bank is planning the implementation of a disaster recovery configuration for its "RightFax" application, which sends and receives facsimile transmissions and is in need of additional numbering resources. To accommodate its needs, First Bank is in need of 200 additional lines to fully complete their Disaster Recovery requirements. Specifically, they need the same last four digits at their Clayton location as they have at their Hazelwood location. More specifically, the requested resources consist of a one thousands-block from which 200 consecutive numbers may be drawn that are within (1) the 314 NPA, (2) an XXXX range from 3500-3599 and 3600-3699 (i.e., 314-NXX-3500 through 3599 and 314 NXX-3600 through 3699) 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 First Bank. 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 First Bank; 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.

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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 First Bank.

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 3500 through 3599 and 3600 through 3699, 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