

**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                         )  
Number Plan Thousands-Block Pooling                            )  
Administrator's Decision to Withhold Numbering                )  
Resources   )

**File No. LO-2017-0058**

**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 25, 2016, 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 Ladue, Missouri rate center. More specifically, the requested resources consist of one 1000-block of consecutive numbers to meet the needs of the Boeing Company's new facility in the Hazelwood area.

2. Teleport states that it does not have the numbers available for assignment in the Ladue rate center to meet Boeing's needs. 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 Boeing; however, said numbers do not meet the required criteria.

3. Teleport provided the Staff with its telephone number utilization for the Ladue, 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 Boeing.

**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 Ladue, Missouri rate center, and
- (3) Contains the following language:

The Commission grants Teleport Communications America, LLC request for 1,000 consecutive numbers within the Ladue, 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 9<sup>th</sup> day of September, 2016.

A handwritten signature in black ink, appearing to be "Allan" followed by a stylized surname.

# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. LO-2017-0058

**From:** Kari Salsman  
John VanEschen  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve Teleport Communications America, LLC's Request for Additional Numbering Resources to accommodate the needs of Boeing Company in the Ladue rate center.

**Date:** September 9, 2016

On August 25<sup>th</sup>, Teleport Communications America, LLC (Teleport), an affiliate of AT&T Corp., 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 the request of Teleport for additional telephone numbering resources in the Ladue, Missouri telephone rate center (Application). According to Teleport, the Boeing Company (Boeing) is opening a new facility in the Hazelwood area. With this expansion, Boeing is in need of 1,000 consecutive numbers to support personnel at the new Hazelwood facility.

According to its Application, Teleport states that it does not have the numbers available for assignment in the Ladue rate center to meet the needs of Boeing and 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 Boeing; 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 Ladue rate center. 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 Boeing.

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

Grant Teleport Communications America, LLC request for 1,000 consecutive numbers within the Ladue, 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 Teleport'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 that reads "Kari Salsman".

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KARI SALSMAN