

**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 |) | Case No. _____ |
| Number Plan Thousands-Block Pooling |) | |
| Administrator's Decision to Withhold Numbering |) | |
| Resources |) | |

APPLICATION FOR NUMBERING RESOURCES

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. ("NeuStar"), to withhold certain numbering resources from AT&T Missouri.

The requested numbering resources are necessary to meet the needs of SSM Health Care - St. Louis and SSM St. Clare Health Center in Fenton, Missouri. The resources consist of four (4) thousands-blocks that are (1) within the 636 NPA, (2) within the Fenton rate center (FNTNMO54DS0), and (3) comprised of the XXXX ranges of 2XXX, 3XXX, 4XXX and 5XXX. The requested thousands-blocks are necessary to meet St. Clare Health Center's telecommunications-related needs. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet St. Clare Health Center's needs.

¹ Southwestern Bell Telephone Company d/b/a 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).

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 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:

Timothy P. Leahy
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. SSM Health Care - St. Louis is a major provider of a wide range of health care services in the St. Louis area, offering services through, for example, St. Joseph Hospital of Kirkwood and St. Mary's Health Center. It is in the process of building a new facility at 1015 Bowles Avenue in Fenton, Missouri, which will be known as SSM St. Clare Health Center. (SSM

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, Order Granting Expedited Treatment and Approving Tariffs*, Case No. TO-2002-185, issued June 29, 2007.

Health Care - St. Louis and SSM St. Clare Health Center shall be referred to collectively herein as “St. Clare Health Center”). The new St. Clare Health Center will provide acute health care to the Southwest St. Louis County area. As explained in greater detail below, St. Clare Health Center needs 4,000 Direct Inward Dial (“D.I.D.”) numbers for the facility.

4. A copy of the June 23, 2008 letter from Mr. James M. Rogan, Senior Telecom Systems Analyst of SSM Integrated Health Technologies, is attached hereto and marked as Exhibit A. As noted in the letter, St. Clare Health Center needs “4000 D.I.D. numbers for the main facility. This is for all hardwired telephone sets, wireless handsets, FAX machines and conference phones. These 4000 numbers need to be consecutive numbers and must be in the 2000, 3000, 4000 and 5000 blocks specifically to accommodate and coordinate numbering patterns that match patient rooms on each floor of the hospital. SSM is requiring that D.I.D. numbers match the specific 4 digit patient room numbers at the new SSM St. Clare Health Center to create an easier dial plan for family members trying to reach patients.” AT&T Missouri understands that St. Clare Health Center will draw at least five hundred numbers from each thousands-block, whose first XXXX digit will correspond with a specific patient floor of the hospital.

5. AT&T Missouri has researched the available blocks in its Fenton rate center (FNTNMO54DS0) which will serve St. Clare Health Center’s location. AT&T Missouri has determined that it has no thousands-blocks available in order to meet St. Clare Health Center’s needs.

6. As a result of this research, AT&T Missouri requests that the Commission grant it numbering resources consisting of four (4) thousands-blocks that are (1) within the 636 NPA, (2) within the Fenton rate center (FNTNMO54DS0), and (3) comprised of the XXXX ranges of 2XXX, 3XXX, 4XXX and 5XXX. AT&T Missouri has determined that the numbering resources requested herein would be compatible with St. Clare Health Center’s telecommunications service

requirements. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet St. Clare Health Center's needs.

7. On June 18, 2008, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet St. Clare Health Center's needs. A copy of the Application is attached hereto and is marked 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 and marked as Exhibit C.

8. On June 18, 2008, NeuStar denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the utilization criteria. A copy of that decision is attached hereto and marked as Exhibit D.

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

10. Under existing procedures, NeuStar 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 provides that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn NeuStar's decision to withhold numbering resources.⁵ Thus, the Commission has the authority to "affirm or overturn the [NeuStar's] decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering

⁵ Report and Order and Further Notice of Proposed Rule Making, 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).

resource application requirements herein.”⁶ Moreover, the FCC determined that states may overturn NeuStar’s decision to withhold numbering resources from the carrier where there is a verifiable need 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

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 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 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

12. 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 Fenton rate center (FNTNMO54DS0) 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 NeuStar (i.e., its Thousands-Block Application Form, Part 1A) and NeuStar’s denial of that request. 4 CSR 240-37.040(1)(A)3. *See*, Exhibits B and D, respectively.

⁶ *Id.*

⁷ Third Report and Order and Second Order on Reconsideration, 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.*

⁹ *Id.* at paragraph 66.

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.

13. 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. Moreover, AT&T Missouri has no pending actions which satisfy the listed criteria in Arkansas, Kansas, Missouri or Oklahoma. AT&T Missouri (which operates in Texas under the fictitious name AT&T Texas) has six pending formal complaints or lawsuits from end-user customers in Texas which involve retail customer service or rates.¹⁰

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

15. While AT&T Missouri does not seek expedited treatment of a nature sometimes requested in its previous numbering resource applications filed (e.g., 30 days), AT&T Missouri requests that this Application be addressed with an eye towards certain needs which St. Clare Health Center has indicated to AT&T Missouri. In particular, St. Clare Health Center reports that “[a]lthough our facility is not scheduled for opening until March 2009, it is imperative that we confirm available D.I.D. numbers 5 months in advance of opening to allow for number assignments, testing, notification, referrals, public relations and other activities associated with bringing the new hospital to operational readiness for opening.” Exhibit A. As the Commission may be aware, not

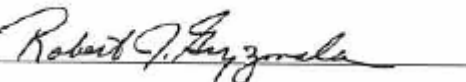
¹⁰ The pending lawsuits in Texas involving customer service or rates are (1) Irving's Holding, Inc. v. SBC Communications, Inc., Docket No. CC-05-07415-C and (2) David Lavine, M.D. and David Lavine, M.D., P.A. d/b/a Center for Cosmetic and Reconstructive Surgery v. AT&T Inc., Cause No. 07-54771-2. The pending formal complaints before the Texas Public Utility Commission involving customer service or rates are as follows: (1) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34332; (2) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34940; (3) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 35363; Complaint of Lonzie Leath Against AT&T Texas, Docket No. 35133; and (4) Complaint of John J. Gitlin, Esq. Against AT&T Texas, Docket No. 34348.

until a Commission order is issued can AT&T Missouri file a new request with NeuStar for the release of the numbering resources to AT&T Missouri described herein, both to meet St. Clare Health Center's needs and so that AT&T Missouri and any other telecommunications service providers that provides service via a switch can program their switches.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NeuStar's previous determination in this matter within sixty to ninety (60-90) days, and instruct NeuStar to release the numbering resources described herein to meet the telecommunications needs of St. Clare Health Center and, in the event that the requested resources are then unavailable, to release such other suitable blocks as will meet St. Clare Health Center's needs.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

TIMOTHY P. LEAHY #36197

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for Southwestern Bell Telephone Company

d/b/a AT&T Missouri

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St. Louis, Missouri 63101

314-235-6060 (Telephone)/314-247-0014 (Facsimile)

robert.gryzmala@att.com (E-Mail)

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

VERIFICATION

I, Alan G. Kern, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and Director-Regulatory of AT&T Services, Inc. I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.

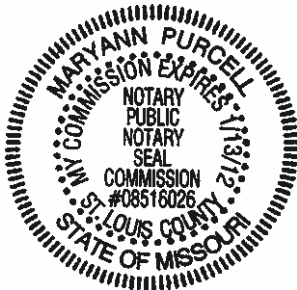


Alan G. Kern

Sworn and subscribed to before me this 2nd day of July, 2008.

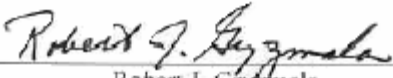


Notary Public



CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on July 2, 2008.


Robert J. Grymalak

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June 23, 2008

Mr. Steven Timm
AT&T Missouri
Sr. Account Manager
12851 Manchester Road, 3-W-252
Des Peres, MO 63131

Dear Mr. Timm,

SSM Health Care-St. Louis (d.b.a.) SSM St. Joseph's Health Center is constructing a new health care facility in Fenton, Missouri. This new facility will be known as SSM St. Clare Health Center. Currently the address being used for construction purposes is 1015 Bowles Avenue, Fenton MO 63026. SSM St. Clare Health Center as part of SSM Health Care-St. Louis will provide acute health care to the Southwest St. Louis county area. The current plan has SSM St. Clare Health Center opening for business on March 30, 2009.

The Telecommunication needs are as follows;

4000 D.I.D. numbers for the main facility. This is for all hardwired telephone sets, wireless handsets, FAX machines and conference phones. These 4000 numbers need to be consecutive numbers and must be in the 2000, 3000, 4000, and 5000 blocks specifically to accommodate and coordinate numbering patterns that match patient room numbers on each floor of the hospital. SSM is requiring that D.I.D. numbers match the specific 4 digit patient room numbers at the new SSM St. Clare Health Center to create an easier dial plan for family members trying to reach patients.

Although our facility is not scheduled for opening until March 2009, it is imperative that we confirm available D.I.D. numbers 5 months in advance of opening to allow for number assignments, testing, notification, referrals, public relations and other activities associated with bringing the new hospital to operational readiness for opening.

At this time we are looking at 4-ISDN-PRI circuits. Each circuit will utilize all 24 ports on each circuit for a total of 96 ports.

We will need at least 8 -1FB circuits and an unknown number of special circuits for fire alarm and other monitoring services.

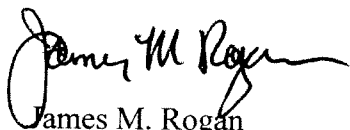
As we get further along in the project we will be able to refine and identify all the circuits and circuit types needed.

We would like to look at number replication with the Fenton wire center being the "service" and another wire center as the "protect" source.

Page 2, SSM St. Clare Health Center

The customer contact for all Telecommunications needs at SSM St. Clare Health Center and SSM St. Joseph's Hospital Kirkwood will be Jim Rogan his contact information is, office 314-768-8993, pager 314-999-3053 and e-mail

Sincerely,

A handwritten signature in black ink, appearing to read "James M. Rogan". The signature is fluid and cursive, with a large initial "J" and "R".

James M. Rogan
Sr. Telecom Systems Analyst
SSM Integrated Health Technologies
SSM St. Mary's Health Center
SSM St. Joseph's Hospital Kirkwood
SSM St. Clare Health Center

CC: Leighton Wassilak, Information Systems Manager

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A****Type of Application (check one):** ☒ **New** ☐ **Changeⁱ** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**

Company Name: AT&T CORPORATION
 Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583
 Contact Name: CONNIE MCNAUGHTON
 Contact Address:
2600 CAMINO RAMON, 1S900V City SAN RAMON State CA Zip 94583
 Phone: 925-824-5627 Fax: 925-355-9268
 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: julie.kline@neustar.biz

1.2 General Information**Check one:** No LRN needed ☒ **LRN neededⁱⁱⁱ** _____

NPA: 636 LATA: 520 OCN^{iv}: 9533 Parent Company's OCN 9533
 Number of Thousands-Blocks Requested: 4

Switch Identification (Switching Entity/POI)^v: FNTNMO54DS0 City or Wire Center Name _____
 Rate Center^{vi}: FENTON Rate Center Sub Zone: _____

1.3 Dates

Date of Application^{vii}: 06/18/2008 Requested Block Effective Date^{viii}: 45 DAYS
 Request Expedited Treatment? (See Section 8.6) Yes _____ No ☒ **X**

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: WIRELINE
- c) Thousands-Block(s) (NXX-X) assignment preference (optional) **SSC J – EMS SERVICE, 636-XXX, 2, 3, 4, 5**
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any **SSC N – LOCAL SERVICE**
- 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) _____.

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A****1.5 Type of Request**

Initial block for rate center: Yes____, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes__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 _____

1.6 Block Return

-
- a) Is this block Contaminated: Yes____ or No____
b) If Yes how many TNs are NOT available for assignment:____
c) Have all new Intra SP ports been completed in the NPAC: Yes____ or No____
d) Has this block been protected from further assignment: Yes____ or No____
-

Remarks: __SAFETY VALVE WAIVER REQUEST – ST CLARE HOSPITAL – SSC J SERVICE _____

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) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

ON FILE- CONNIE MCNAUGHTON_ _CODE ADMINISTRATOR_ _JUNE 11, 2008_____
Signature of Block Applicant Title Date

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1

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 Telcordia™ LERG™ 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 Telcordia™ 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 CLLI™ 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, inter-exchange carrier, CMRS. They 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.

Section 1.6 Service Providers shall indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA must seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A**

Foot Notes:

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).

^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 CLLI™ 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.

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹
(Thousands-Block Number Pooling Growth Block Request)

Date: 06/11/2008 OCN: 9533 Company Name: AT&T - SOUTHWEST

Rate Center: FENTON

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (5) 636-326, 636-349, 636-305, 636-343, 636-717 NPA/NXX-X (5) 636-717-0,1,2,3,6

Name of Block Applicant: CONNIE MCNAUGHTON Signature: SIGNATURE ON FILE

Title: CODE ADMINISTRATOR Telephone No.: 925-824-5627 FAX No.: 925-355-9268

E-Mail: cm3123@att.com

A. Available numbers: 14830

B. Assigned numbers: 28696

C. Total Numbering Resources: 4500

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: None

List excluded Code(s) or Block(s): None

| | Month #1 | Month #2 | 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>-102</u> | <u>-12</u> | <u>-145</u> | <u>130</u> | <u>18</u> | <u>41</u> | | | | | | |
| F. Forecast – Next 12 months ³ | <u>0</u> | <u>81</u> | <u>4113</u> | <u>0</u> | <u>47</u> | <u>64</u> | <u>39</u> | <u>31</u> | <u>36</u> | <u>16</u> | <u>15</u> | <u>0</u> |
| G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): | | | | | | | | <u>718</u> | | | | |
| H. Months to Exhaust ⁴ | $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$ | | | | | | | = | | <u>21</u> | | |
| I. Utilization ⁵ | $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$ | | | | | | | * 100 | = | <u>63.769%</u> | | |

Explanation: ACTL MO 1 (-159) ACTL MO 4 (-19) ACTL MO 12 (-83) SAFETY VALVE WAIVER REQUEST – ST CLARE HOSPITAL – SSC J.

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))

Dated 18 June 2008

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPA Part 3

Tracking Number : 636-FENTON-MO-218236

Date of Application: 06/18/2008 Effective Date: _____
Date of Receipt: 06/18/2008 Date of Response: 06/18/2008

Service Provider Name: SOUTHWESTERN BELL
(Telcordia TM LERG TM Routing Guide) OCN: 9533

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-7652
Signature of Pooling Administrator
Genevieve Bettiga Fax: 925-363-7683
Name (print)
Email: genevieve.bettiga@neustar.biz

NPA-NXX or NPA-NXX-
X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code Modified : _____
Block/Code Disconnected : _____

Block Contaminated(Yes or No) :
If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

Rate Center:

Rate Center Sub Zone:

FNTNMO54DS0

FENTON

☒ **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.

☐ **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.)

EXHIBIT E
IS
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IN ITS ENTIRETY