

**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 )

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

COMES NOW AT&T Missouri<sup>1</sup> 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 needs of Metropolitan Community College ("MCC"), located in the Kansas City area, and consist of 400 consecutive numbers that will serve MCC's Blue River Campus. More specifically, the requested resources consist of one (1) thousands block, from which four hundred (400) numbers may be drawn that are within (1) the 816 NPA, (2) the Kansas City rate center, (3) the 604 NXX, and (4) the XXXX range of 6400-6799 (i.e., 816-604-6400 through 816-604-6799).

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

---

<sup>1</sup> 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).

Missouri<sup>2</sup> and its fictitious name is duly registered with the Missouri Secretary of State.<sup>3</sup> 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.<sup>4</sup>

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

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. MCC is a Kansas City area community college comprised of several campuses. On July 24, 2009, based on MCC's growth, its upgrading of telecommunications facilities and its effort to meld its campuses within a single "One College, One Campus" theme, the Commission issued its Order Overturning North American Numbering Plan Administrator's Decision in Case No. IO-2010-0013 ("Order"). As a result of the Order, AT&T Missouri's request to receive five blocks of one thousand telephone numbers in the 816 NPA within the XXXX range of 1000-5999 in the Kansas City rate center was granted. Thereafter, MCC was assigned numbers in the 604 NXX, within the XXXX range of 1000 through 5999.

---

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

4. It has since been determined that the need for additional numbering resources at MCC's Blue River campus was not adequately accounted for. Consequently, according to the September 14, 2009, letter from Ms. Sheryl O'Roark, MCC's Telecommunications Manager (attached hereto as Exhibit A), MCC is in need of "an additional 400 numbers, 604-6400-6799, to enable us to match all of our existing numbers with only the prefix changing." MCC emphasizes, as it had in the course of the application leading to the Commission's July 24 Order, that "it is important that MCC have one common NXX for all of its campuses city-wide, as part of its goal of serving the area as 'One College, One Campus.'" *Id.* MCC also reports that it is willing to return 604-5800 through 5899, and most of 220-6400 through 6799, in order to preserve number resources. *Id.*

5. AT&T Missouri has researched the available numbering resources in the Kansas City rate center which serves MCC's campus locations. AT&T Missouri has determined that it has no numbers available to meet MCC's needs.

6. As a result of this research, AT&T Missouri requests that the Commission grant it numbering resources consisting of one (1) thousands block, from which four hundred (400) numbers may be drawn that are within (1) the 816 NPA, (2) the Kansas City rate center, (3) the 604 NXX, and (4) the XXXX range of 6400-6799 (i.e., 816-604-6400 through 816-604-6799).

7. On September 18, 2009, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet MCC'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.

8. On September 18, 2009, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization or months-to-exhaust criteria. A copy of that decision is attached hereto as Exhibit D.

9. 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.

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.<sup>5</sup> 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."<sup>6</sup> 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:

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.<sup>7</sup>

---

<sup>5</sup> 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).

<sup>6</sup> *Id.*

<sup>7</sup> 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).

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.”<sup>8</sup> 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.”<sup>9</sup>

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 Kansas City 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.

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,

---

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* at paragraph 66.

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.<sup>10</sup>

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

15. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within ten (10) business days. MCC's letter states that MCC "need[s] to activate the new numbers by October 1, 2009, or sooner, if possible." (Exhibit A). In order to accommodate MCC'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. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri's request for numbering resources on September 18, 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 ten (10) business days, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Metropolitan Community College.

---

<sup>10</sup> 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) Formal Complaint Pursuant to PUC Procedural Rule 22.242 Against AT&T On Behalf Of The River Oaks Imaging, Docket No. 34511 and (4) Complaint of John J. Gitlin, Esq. Against AT&T Texas, Docket No. 34348.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

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

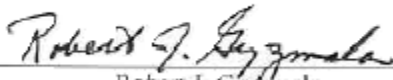
St. Louis, Missouri 63101

314-235-6060 (tn)/314-247-0014 (fax)

[robert.gryzmala@att.com](mailto:robert.gryzmala@att.com)

**CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by e-mail on September 22, 2009.

  
Robert J. Gryzmala


General Counsel  
Kevin Thompson  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)  
[kevin.thompson@psc.mo.gov](mailto:kevin.thompson@psc.mo.gov)

Public Counsel  
Michael F. Dandino  
Office Of The Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)  
[mike.dandino@ded.mo.gov](mailto:mike.dandino@ded.mo.gov)

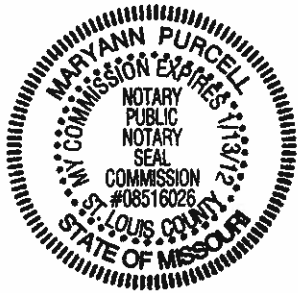
CITY OF ST. LOUIS        )  
  )  
STATE OF MISSOURI        )        SS

**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 Director-Regulatory of AT&T Services, Inc. I 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 22<sup>nd</sup> day of September, 2009.



  
\_\_\_\_\_  
Notary Public





Department of Telecommunications

September 14, 2009

Stephanie Hundley  
Technical Sales Consultant GEM  
AT&T  
500 East 8<sup>th</sup> Street, Suite 808  
Kansas City, MO 64106

Dear Stephanie:

Metropolitan Community College (MCC), in Kansas City, Missouri, is requesting an additional 400 numbers, 604-6400-6799, to enable us to match all our existing numbers with only the prefix changing.

MCC is changing from Plexar Custom to Cisco IP Telephony, and has already reserved 604-1000-5999 as a result of recent action taken by the Missouri PSC. As we have mentioned before, it is important that MCC have one common NXX for all of its campuses city-wide, as part of its goal of serving the area as "One College, One Campus." To accomplish this at our Blue River Campus, we need the additional numbers in the range of 6400-6799 (within NXX 604) to match our existing numbers. We would be willing to return 604-5800 through 5999, and most of 220-6400-6799, to preserve number resources.

We plan to serve all eight (8) campus locations with the new Cisco Call Manager, utilizing OPTEMAN as our Wide Area Network. Inter-campus traffic will traverse the OPTEMAN network.

Our clients and staff utilize dial 8 + ten digits for calls to the PSTN, which will be routed over our PRI SmartTrunk spans. Our current dialing pattern is five-digit internally. We want to implement four-digit dialing for dialing consistency.

Our request for a single prefix (NXX) is so our constituents perceive MCC as "One College, One Campus."

We need to activate the new numbers by October 1, 2009, or sooner, if possible.

AT&T is our chosen service provider, and we understand that they might escalate this request to the Missouri PSC. It is important that we know as soon as possible if our request can be granted.

Sincerely,

A handwritten signature in black ink that reads 'Sheryl O'Roark'.

Sheryl O'Roark  
Telecommunications Manager

Tracking Number: \_\_\_\_\_

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

### Thousands-Block Application Form Part 1A

Type of Application (check one):  New  Change<sup>i</sup>  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, 1S900V City San Ramon State CA Zip 94583

Phone: 925-824-5627 Fax: 925-355-9268

E-Mail: cm3123@att.com

###### Pooling Administrator<sup>ii</sup>:

Contact Name: KEVIN GATCHELL

Contact Address: 1800 SUTTER STREET, Suite 571 City CONCORD State CA Zip 94520

Phone: 925-363-7653 Fax: 925-363-7686

E-Mail: Kevin.gatchell@neustar.biz

##### 1.2 General Information

Check one: No LRN needed   LRN needed<sup>iii</sup> \_\_\_\_\_

NPA: 816 LATA: 524 OCN<sup>iv</sup>: 9533 Parent Company's OCN 9533

Number of Thousands-Blocks Requested: 1

Switch Identification (Switching Entity/POI)<sup>v</sup>: KSCYMO05DS0 City or Wire Center Name

Rate Center<sup>vi</sup>: KANSASCITY Rate Center Sub Zone: \_\_\_\_\_

##### 1.3 Dates

Date of Application<sup>vii</sup>: 09/18/2009 Requested Block Effective Date<sup>viii</sup>: NORMAL PROCESS

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: ILEC (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for: WIRELIN

c) Thousands-Block(s) (NXX-X) assignment preference (optional) 816-604-6

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 , 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: SAFETY VALVE WAIVER REQUEST FOR METROPOLITAN COMMUNITY COLLEGE .

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.

<u>Connie McNaughton</u>	<u>CODE ADMINISTRATOR</u>	<u>SEPTEMBER 18, 2009</u>
Signature of Block Applicant	Title	Date

---

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
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<sup>ix</sup>. 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. 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.

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

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1**Thousands-Block Application Form  
Part 1A**

Foot Notes:

---

<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> 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).

<sup>v</sup> 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.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> 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: 09/18/2009 OCN: 9533 Company Name: AT&T-SOUTHWEST

Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA-NXX (169 ) NPA-NXX-X ( 730 )- see attached list

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: 408471

B. Assigned Numbers: 789337

C. Total Numbering Resources: 1354977

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0

List excluded Code(s) or Block(s): 0

	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 <sup>2</sup>	<u>-2245</u>	<u>-1800</u>	<u>1574</u>	<u>-2517</u>	<u>-650</u>	<u>1708</u>						

F. Forecast – Next 12 months <sup>3</sup>	<u>0</u>	<u>0</u>	<u>1502</u>	<u>0</u>	<u>14</u>	<u>314</u>	<u>79</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
---	----------	----------	-------------	----------	-----------	------------	-----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 305

H. Months to Exhaust<sup>4</sup>  $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}} = \underline{1339.249}$

I. Utilization<sup>5</sup>  $\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}} * 100 = \underline{58.255\%}$

Explanation: - **Actual Value M1(- 8072) Actual Value M2(-2499) Actual Value M4(-3430) Actual Value M8(-1122) Actual Value 9(-1522)**

**Actual Value M10(-433) Actual Value M11(-444) Actual Value M12(-3757) SAFETY VALVE REQUEST. Dedicated Customer METROPOLITAN COMMUNITY COLLEGE.**

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))

**From:** genevieve.bettiga@neustar.biz

Exhibit D

**Sent:** Friday, September 18, 2009 10:38 AM

**To:** GESCAT, SUZANNE S (ATTPB); PANOPIO, LOURDES B (ATTPB); MC NAUGHTON, CONNIE S (ATTOPS); LOWERY, JEANNIE C (ATTPB)

**Cc:** PA\_Part3@neustar.biz

**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 816-KANSASCITY-MO-319153



## Pooling Administration System

Dated 18 September 2009

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPA3 Part 3

**Tracking Number :** 816-KANSASCITY-MO-319153

**Date of Application:** 09/18/2009 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 09/18/2009 **Date of Response:** 09/18/2009

**Service Provider Name:** SOUTHWESTERN BELL  
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> 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:** KSCYMO05DS0

**Rate Center Sub Zone:** KANSASCITY

**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.**

**Request withdrawn.**

**Explanation:** \_\_\_\_\_

**Assignment activity suspended by the administrator.**

**Explanation:** \_\_\_\_\_

**Remarks:** \_\_\_\_\_

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the \_\_\_\_\_ of Telecoordin

**EXHIBIT E**

**IS**

**HIGHLY CONFIDENTIAL**

**IN ITS ENTIRETY**