

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of MCImetro)
Access Transmission Services, LLC d/b/a Verizon)
Access Transmission Services for Review and) Case No.
Reversal of the North American Number Plan)
Administrator's Decision to Withhold Numbering)
Resources.)

MCImetro ACCESS TRANSMISSION SERVICES, LLC
d/b/a VERIZON ACCESS TRANSMISSION SERVICES'
APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services ("Verizon") and files this verified Application and Motion for Expedited Treatment, pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16) and 47 C.F.R. 52.15(g)(3)(iv), and respectfully requests that the Missouri Public Service Commission ("Commission") issue an Order on an expedited basis that reviews and reverses the decision of the Pooling Administrator, NeuStar, Inc., ("PA") to withhold certain numbering resources from Verizon in the form of a block of 2,000 contiguous numbers to meet the needs of a new customer in St. Louis (314 NPA). In support of its application, Verizon states as follows:

1. MCImetro Access Transmission Services, LLC (MCIMetro) is a Delaware limited liability company in good standing duly authorized to conduct business in Missouri with regulatory offices at 600 Hidden Ridge, HQE02H45, P.O. Box 152092, Irvin, Texas 75015-2415. MCImetro is authorized to do business in Missouri and its fictitious name Verizon Access Transmission Services is duly registered with the Missouri Secretary of State.¹ A Certificate of Good Standing from the Missouri Secretary of State is attached hereto as Exhibit D. MCImetro is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

¹ MCImetro filed a copy of the registration of the fictitious name "Verizon Access Transmission Services" with the Commission on December 23, 2005. See, In the Matter of the name Change of MCImetro Access Transmission Services to Verizon Access Transmission Services, Case No. LN-2006-0276.

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

Carl J. Lumley
Leland B. Curtis
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
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3. On or about March 7, 2006, Verizon submitted a Thousands-Block Application Form, Part 1A, for the assignment of a block of 2,000 contiguous numbers to meet the needs of a new customer in St. Louis (314 NPA). Verizon 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 Worksheet.

4. Verizon submitted the request because Verizon does not have such a block of numbers which could be used to serve the customer.

5. On or about March 7, 2006, the PA denied the request on the grounds that Verizon had not met the utilization criteria of 75% as required by the Federal Communications Commission. The following Highly Confidential Exhibits are submitted herewith under seal:²

- a. Exhibit A: Thousand-Block Application Form, Part 1A;
- b. Exhibit B: Months to Exhaust and Utilization Certification Worksheet;
- c. Exhibit C: The PA's decision denying additional numbering resources.

6. Under existing procedures, the PA 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

² Verizon has filed a motion herewith pursuant to 4 CSR 240-2.085 for the issuance of a standard protective order and uses the phrase "highly confidential" as defined therein. The exhibits submitted herewith concern a specific customer and market-specific information relating to services offered in competition with others.

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 reaffirm or overturn the PA's decision to withhold numbering resources.³ Thus, the Missouri Commission has the authority to "affirm or overturn the PA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁴ Moreover, the FCC gave the states the flexibility to direct the PA to assign additional numbering resources to carriers that have demonstrated a verifiable need.⁵ The FCC recognized that in many instances, the failure to address a request for additional numbering resources can impair a carrier's ability to stay in or expand business.⁶ 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."⁷

7. Verizon seeks the Commission's expedited direction to overturn the PA's decision to withhold numbering resources. This Commission has previously overturned the PA's decision to withhold numbering resources for other carriers.

8. Verizon does not have any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

9. Verizon does not have any annual report or assessment fees that are overdue in Missouri.

³ 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).

⁴ Id.

⁵ Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, December 12, 2001, paragraph 61.

⁶ Id. at paragraph 66.

⁷ Id.

10. Verizon asks that the Commission act on this request as soon as possible and no later than within ten (10) business days as envisioned by the FCC. Expedited action is needed to meet the customer's needs. There will be no negative effective on other customers or the general public if the Commission acts expeditiously. This pleading was filed as soon as possible.

WHEREFORE, Verizon respectfully requests that the Commission overturn the PA's previous determination in this matter on an expedited basis as envisioned by the FCC, and instruct the PA to release the numbering resources necessary for Verizon to serve its new customer.

Respectfully submitted

/s/ Carl J. Lumley

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d/b/a Verizon Access Transmission Services

VERIFICATION

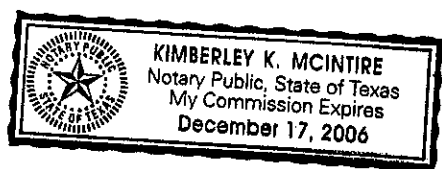
STATE OF _____)
)
COUNTY OF _____) ss:

I, DANNY ADAMS, being first duly sworn, depose and state that I am over the age of 21 years, sound of mind, and the Code Administrator of MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services, the Applicant in the subject proceeding, and that I am authorized to make this Verification on behalf of MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services; that I have read the foregoing Application and know the contents thereof; and that the same is true and correct to the best of my knowledge, information, and belief. Further, I verify that the Applicant will comply with all other applicable rules and regulations. I also verify that Carl J. Lumley, Leland B. Curtis, and Curtis, Heinz, Garrett & O'Keefe, PC, 130 S. Bemiston, Suite 200, Clayton, Missouri, 63105 are authorized to sign all pleadings and documents necessary to receive the approval of the Missouri Public Service Commission of the foregoing Application, and to represent MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services in this proceeding.

Danny Adams

Subscribed and sworn to before me this 23rd day of March, 2006.

My commission expires: December 17, 2006



Certificate of Services

A true and correct copy of the foregoing document was either emailed, faxed or mailed this 23rd day of March, 2006, to:

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Missouri Public Service Commission
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/s/ Carl J. Lumley_____