

In the Matter of the Application of Embarq  
Missouri Inc. d/b/a CenturyLink, For Review and  
Reversal of North American Number Plan  
Thousands-Block Pooling Administrator's Decision  
to Withhold Numbering Resources.

2. Evidence of proper name registrations was most recently provided to this Commission in Case No. TO-97-53 (Re: United Telephone Company of Missouri's

Adoption Notice Designed to Change the Company's Name to United Telephone Company of Missouri d/b/a Sprint), Case No. TO-98-107 (Application of United Telephone Company of Missouri d/b/a Sprint for Approval of Name Change to Sprint Missouri, Inc.), Case No. TN-2006-0416 (Re Name Change Request of Sprint Missouri, Inc., to Embarq Missouri, Inc., d/b/a Embarq) and Case No. TN-2010-0086 (Fictitious Name Change Request of Embarq Missouri, Inc. d/b/a Embarq to Embarq Missouri, Inc. d/b/a CenturyLink). CenturyLink requests that the information in those cases be incorporated herein by reference.

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

Becky Owenson Kilpatrick  
100 CenturyLink Drive  
Monroe, LA 71203  
Phone: 318.340.5027  
[becky.kilpatrick@centurylink.com](mailto:becky.kilpatrick@centurylink.com)

4. There are no pending actions or final unsatisfied judgments or decisions against CenturyLink from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.

5. Lebanon R-III School District will be installing a new telecommunications system that has the capability to provided direct-inward-dialing (DID). Currently, the School District's system is a patchwork of DID numbers that were assembled over time. Changing the DID numbers into a sequential numbering plan will be more efficient, easier to use and will provide easier assignment for emergency response location.<sup>1</sup>

---

<sup>1</sup> A copy of the Customer Request to CenturyLink is attached hereto and marked as Exhibit A.

6. With the establishment of the new telecommunications system, Lebanon R-III School District will need 1,000 consecutive numbers for the anticipated number of DID numbers needed for every phone extension in the district. Lebanon R-III School District needs the numbers as quickly as possible in order to implement the new system before the start of school in August.

7. CenturyLink has researched the available thousand-blocks in its Lebanon rate center (LBNNMOXADSo) which serves this customer. CenturyLink has no thousands-blocks available for use from which to draw the requested sequential numbering resources that would meet Lebanon R-III School District's needs. As a result of this research, CenturyLink requests that the Commission grant it numbering resources with the NPA-NXX of 417-657, beginning with 6 or 7 as requested.

8. On July 15, 2016, CenturyLink submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Lebanon R-III School District's needs.<sup>2</sup> CenturyLink completed the Thousands-Block Application Form 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.<sup>3</sup>

9. On or about July 15, 2016, NANPA denied the requests on the grounds that CenturyLink had not met the utilization criteria.<sup>4</sup>

10. CenturyLink seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's

---

<sup>2</sup> A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

<sup>3</sup> A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

<sup>4</sup> A copy of this decision is attached hereto and marked as Exhibit D.

decision to withhold numbering resources in several cases where customers have required a large amount of sequential numbers and it should likewise do so here.

11. 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.<sup>7</sup>

12. 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

---

<sup>5</sup> 15 FCC Rcd. 7574, *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rule Making, CC Docket No. 99-200 (rel March 31, 2000), Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

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

<sup>7</sup> *In the Matter of Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration, CC Docket No. 99-200, et al., (rel. December 28, 2001), para. 64; *see also*, 47 CFR 52.15(g)(4).

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

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>

13. Further, this Application complies with 4 CSR 240-37.040. CenturyLink has attached hereto its “Months to Exhaust Worksheet” indicating the utilization for the Lebanon rate center encompassing the preceding six months and projected monthly utilization for the next twelve months.<sup>10</sup> CenturyLink has also attached its most recently filed FCC Form U1 of Form 502 for the Lebanon rate center.<sup>11</sup> Finally, CenturyLink attaches copies of its originally-filed requests to NANPA and NANPA’s denial of those requests.<sup>12</sup> These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyLink has exhausted all other available remedies designed to conserve numbering resources.

14. CenturyLink seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. In order to accommodate Lebanon R-III School District’s needs, the Commission must issue its order as soon as possible so that CenturyLink will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyLink described herein, both to meet Lebanon R-III School District’s needs but also so that CenturyLink and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely

---

<sup>9</sup> *Id.*, at para. 66.

<sup>10</sup> See Exhibit C.

<sup>11</sup> The portions of FCC Form U1 of Form 502 pertaining to the Lebanon rate center are attached hereto and marked as Exhibit E (HC) as it contains exchange specific customer numbers. Please note that this file is a copy of the electronic submission that is now required by the Administrator and no longer carries the headings of the paper form that was formerly utilized by the Administrator.

<sup>12</sup> See Exhibits B and D.

basis. CenturyLink filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

WHEREFORE, CenturyLink respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Lebanon R-III School District in Lebanon, Missouri.

Respectfully Submitted,

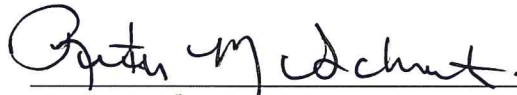
/s/Becky Owenson Kilpatrick  
Becky Owenson Kilpatrick Bar No. 42042  
100 CenturyLink Drive  
Monroe, LA 71201  
Phone: 318.340.5027  
[Becky.kilpatrick@centurylink.com](mailto:Becky.kilpatrick@centurylink.com)

*Attorney for Embarq Missouri, Inc.  
d/b/a CenturyLink*

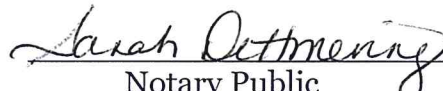
## VERIFICATION

STATE OF WISCONSIN    )  
  ) ss.  
COUNTY OF LA CROSSE )

I, Rita M. Schmitz, of lawful age, and being first duly sworn, now state: I am Analyst II for CenturyLink, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Rita M. Schmitz

Subscribed and sworn to before me this 15th day of July, 2016.

  
\_\_\_\_\_  
Notary Public  
Sarah Dettmering  
Notary Public, State of Wisconsin

My Appointment Expires: 10/2/16



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of July, 2016, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Office of the Public Counsel  
P.O. Box 2200  
Jefferson City, MO 65101  
[mopco@ded.mo.gov](mailto:mopco@ded.mo.gov)

  
\_\_\_\_\_