

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2006-0231

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri

From: Sara Buyak
Telecommunications Department

William Voight 12-9-05

/s/ William K. Haas 12-9-05

Utility Operations Division/Date

General Counsel's Office/Date

Subject: Staff Recommendation to Approve Request to Override Decision of the North American Numbering Plan Administrator

Date: December 8, 2005

On November 29, 2005 Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (SBC) filed a request for additional numbering resources with the Missouri Public Service Commission (Commission). SBC requests that the Commission review and reverse a decision of NeuStar, Inc. (NeuStar), the Pooling Administrator/North American Numbering Plan Administrator (Pooling Administrator), to withhold certain numbering resources to serve the needs of the Park Hill School District. Park Hill School District is requesting 3 blocks of 1,000 consecutive numbers in the Kansas City rate center to convert the old PBX system into a single, integrated phone system that will service the entire school district. Included in this filing is the Central Office Code (NXX) Assignment Request – Part 1A (Part 1), Pooling Administrator's Response/Confirmation, Months to Exhaust Utilization Certification Worksheet, a letter from Park Hill School District, and Code of Federal Regulations Title 47 – Telecommunication Chapter 1 – Federal Communications Commission (47- CFR).

Background

On October 3, 2005, Park Hill School District submitted a letter to SBC requesting service from SBC to replace its existing PBX service into a single, integrated phone system that will span the entire district and utilize SmartTrunks with DID blocks for inbound dialing. Park Hill School District requested 3 blocks of 1000 contiguous numbers that start with 4,5,6,7, or 8. Park Hill School District will return 170 phone numbers to SBC.

On October 21, 2005, SBC submitted an application to the Pooling Administrator for three blocks of 1,000 consecutive telephone numbers in the Kansas City rate center.

On or about October 21, 2005, the Pooling Administrator denied the request for three blocks of 1,000 telephone numbers because SBC's utilization rate of 61.623 % did not meet the required utilization level of 75%.¹

¹ Administrator's Response/Confirmation, remarks, DR 11, March 27, 2002.
Central Office Code (NXX) Assignment Guidelines, November 21, 2003.

The Telecommunications Department Staff (Staff) reviewed the utilization data that SBC submitted to the Pooling Administrator in the CO assignment form. SBC's utilization level of 61.623% is below the FCC guidelines of 75% which is required before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (h).²

Recommendation

SBC does not have three blocks of 1,000 DID numbers in the Kansas City rate center to meet a specific request of the Park Hill School District. Although SBC does not meet the required utilization rate of 75%, SBC has demonstrated a verifiable need for three blocks of 1,000 additional numbers in the Kansas City rate center. Staff recommends the Commission reverse the decision by Neustar to withhold the numbering resources to serve Park Hill School District's request. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

1. Grant SBC's request for three contiguous blocks of 1,000 DID numbers for the requested telephone number of (816) starting with 4, 5, 6, 7, or 8 to meet the needs of Park Hill School District and to be compatible with its single, integrated phone system in the Kansas City rate center.

Staff is unaware of any other filing that may affect or be affected by this filing.

☒ **The Company is not delinquent in filing an annual report and paying the PSC assessment.**

☐ **The Company is delinquent. Staff recommends the Commission grant the requested relief/action on the condition the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this case after it has corrected the delinquency.**

☐ **No annual report** ☐ **Unpaid PSC assessment. Amount owed:**)

² Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.