

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Southwestern)	
Bell Telephone, L.P., d/b/a AT&T Missouri for)	
Review and Reversal of North American Number)	Case No. TO-2007-0343
Plan Administrator's Decision to Withhold)	
Numbering Resources)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On March 20, 2007, Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, filed an Application and Motion for Expedited Treatment requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator (NANPA), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri.¹ The numbering resources AT&T Missouri requested consist of two consecutive thousands-blocks, each having a NPA-NXX of 314-684 and an XXXX within the range 5XXX through 8XXX to meet the needs of Express Scripts, Inc. in the St. Louis, Missouri area. The numbering resources are required in order to meet Express Scripts' expansion needs and the impending relocation of its corporate headquarters into a new St. Louis area building.

2. The Pooling Administrator had denied AT&T Missouri's request on the grounds that AT&T Missouri had not met the standard that an applicant must demonstrate that 75% of the numbers assigned to it in the rate center are currently in use.

3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T Missouri if the Commission determines that AT&T Missouri

¹ Although AT&T Missouri's Application references a decision by the North American Numbering Plan Administrator, the decision to withhold numbering resources was made by the Pooling Administrator. NeuStar, Inc., functions as both Plan Administrator and Pooling Administrator.

has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47C.F.R. §52.15(g)(3)(iv).

4. In the attached Memorandum, labeled Appendix A, the Staff agrees that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an order from the Commission approving AT&T Missouri's request to receive the desired block in the Ladue rate center, AT&T Missouri will be unable to meet the needs of its customer. The Staff recommends that the Commission issue an order overturning the Pooling Administrator's decision.

WHEREFORE, the Staff recommends that the Commission, at its earliest convenience, issue an order that:

- (1) determines that AT&T Missouri has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2) reverses the decision of the Pooling Administrator and grants AT&T Missouri's request to receive two blocks of one thousand numbers in the NPA-NXX of 314-684 and an XXXX within the range of 5XXX through 8XXX, or if the requested blocks are unavailable to grant it other suitable blocks.

Respectfully submitted,

/s/ William K. Haas
William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

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Missouri Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record and to Legal Department, NeuStar, 1800 Sutter Street, Suite 780, Concord, CA, 94520, this 30th day of March 2007.

/s/ William K. Haas
William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No.TO-2007-0343
Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri

From: Sara Buyak
Telecommunications Department

William Voight 3-29-07
Utility Operations Division/Date

William Haas 3-29-07
General Counsel's Office/Date

Subject: Staff Recommendation to Approve AT&T's Request to Override a Decision by the Pooling Administrator

Date: March 27, 2007

SUMMARY: AT&T Missouri (AT&T) has requested that the Commission reverse a decision by the Pooling Administrator, which denied AT&T's request for two blocks of one thousand telephone numbers in the Ladue rate center. This memorandum recommends approval of AT&T's request.

BACKGROUND: On March 15, 2007, AT&T filed with the Missouri Public Service Commission (Commission) a request for two blocks of one thousand telephone numbers to be assigned to the Ladue rate center. AT&T states that it was denied the request by the Pooling Administrator because the Months to Exhaust and Utilization Worksheet did not meet the 6 months exhaust and utilization of 75% criteria. AT&T requests the Commission review and reverse the decision of the Pooling Administrator.

AT&T states that it submitted the necessary worksheets to the Pooling Administrator, and offers copies of those documents as Exhibits B, C, D, and E to its application in this Case. AT&T was denied the additional telephone numbers because it did not meet the necessary requirements established by the Federal Communications Commission. AT&T does have unused telephone numbers available in the Ladue rate center; however, it is unable to meet the customer's request for two blocks of one thousand consecutive telephone numbers for direct inward dial (DID) trunks. Specifically, two blocks of one thousand telephone numbers in the NPA-NXX of 314-684 and an XXXX within the range of 5XXX through 8XXX to meet the needs of Express Scripts, Inc. The XXXX thousands-blocks beginning with 0, 1, 2, 4, and 9 are unacceptable because they conflict with the Express Script's internal dialing plan.

RECOMMENDATION: AT&T does not meet requirements for additional telephone numbers because the months to exhaust and utilization does not meet the required criteria as set forth in the FCC guidelines. However, AT&T does have unused telephone numbers available in the Ladue rate center; however, it is unable to meet the customer's request for two blocks of one thousand consecutive telephone numbers for their DID trunks. Specifically AT&T requests two blocks of one thousand telephone numbers in the NPA-NXX of 314-684 within the range of 5XXX through 8XXX. For this reason, AT&T has

demonstrated a verifiable need for two blocks of one thousand additional numbers in the Ladue rate center. Therefore, the Staff recommends approval of AT&T's application. Additionally, the Staff recommends the Commission's order include the statement substantially as follows:

1. AT&T's request for two blocks of one thousand telephone numbers in the NPA-NXX of 314-684 and an XXXX within the range of 5XXX through 8XXX is granted.

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:

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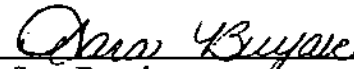
In the Matter of the Application of)
Southwestern Bell Telephone, L.P., d/b/a)
AT&T Missouri For Review and Reversal)
Of The Pooling Administrator's Decision)
to Withhold Numbering Resources)
)

Case No. TO-2007-0343

AFFIDAVIT OF Sara Buyak

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Sara Buyak, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in preparing the accompanying staff recommendation, and that the facts therein are true and correct to the best of her knowledge and belief.


Sara Buyak

Subscribed and affirmed before me this 29th day of March, 2007.
I am commissioned as a notary public within the County of Callaway
State of Missouri and my commission expires on 9-21-10



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


NOTARY PUBLIC