

**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 Number)	Case No. TO-2009-0014
Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold)	
Numbering Resources)	

REQUEST FOR ADDITIONAL TIME TO FILE RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully states to the Commission as follows:

1. On July 2, 2008, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T) filed an Application For Review and Reversal of North American Number Plan Thousands-Block Pooling Administrator's Decision to Withhold Numbering Resources.
2. The Pooling Administrator, NeuStar, Inc., had denied AT&T's request for four blocks of 1,000 Metropolitan Calling Area (MCA) numbers in the Fenton rate center on the grounds that AT&T had not met the utilization criteria.
3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T if the Commission determines that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(4).
4. Staff filed its initial recommendation in this matter on August 18, 2008. In that recommendation, Staff agreed that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other verifiable remedies with regard to half

of the numbering resources requested by the company. Also in its initial recommendation, Staff disagreed that AT&T has a need to contaminate 4 blocks of 1,000 MCA numbers in the Fenton rate center to meet the needs of this customer. Staff initially recommended that AT&T can meet the needs of its customer with two blocks of 1,000 telephone numbers rather than four blocks.

5. After the Staff filed its initial recommendation on August 18, AT&T filed a response to Staff's recommendation on August 22, 2008.

6. Also after the staff filed its initial recommendation, AT&T's customer, SSM Healthcare (SSM), submitted a letter for the Commission's consideration on September 9, 2008.

7. Since Staff filed its initial recommendation on August 18, Staff has engaged in communication with AT&T regarding this numbering request.

8. Staff also submitted several questions to SSM after SSM submitted its letter on September 9, 2008.

9. SSM responded to Staff's questions on September 17.

10. Staff requires additional time to consider the information provided by SSM on September 17 to determine what impact SSM's responses will have on Staff's recommendation and any response Staff will make to AT&T's August 22 filing.

11. Staff requests that the Commission grant it until September 26, 2008 to make any filing responsive to AT&T's August 22 filing.

WHEREFORE, the Staff requests that the Commission allow Staff to file its response to AT&T's August 22 filing no later than September 26, 2008.

Respectfully submitted,

/s/ Jennifer Heintz

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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 this 18th day of September 2008.

/s/ Jennifer Heintz