

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

In the Matter of the Application of MCImetro)
Access Transmission Services, LLC d/b/a)
Verizon Access Transmission Services for)
Review and Reversal of the North American)
Number Plan Administrator's Decision to)
Withhold Numbering Resources.)

Case No. TO-2006-0367

STAFF RECOMMENDATION

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

1. On March 23, 2006, MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services (Verizon) filed its Application seeking review and reversal of the decision of the Pooling Administrator, NeuStar, Inc., to withhold two blocks of 1,000 contiguous numbers that Verizon asserts it needs to provide service to a new customer. Verizon supplemented its Application on March 24 and 31, 2006.

2. The Pooling Administrator had denied Verizon's request because Verizon had not met the utilization criteria of 75% required by the FCC.

3. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from Verizon if the Commission determines that Verizon has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. 47 C.F.R. § 52.15(g)(4).

4. In the attached Memorandum, labeled Appendix A, the Staff agrees that Verizon has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Without an order from the Commission approving Verizon's request to receive the

desired blocks in the St. Louis rate center Verizon will be unable to serve the needs of a new 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 Verizon 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 approves Verizon's request to receive two consecutive blocks of 1,000 numbers (starting with 1, 2, 3, 4, 5, 6, or 7) in the St. Louis rate center.

Respectfully submitted,

/s/ William K. Haas

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

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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 service as shown below this 3rd day of April 2006.

/s/ William K. Haas

North American Numbering Plan
Administrator, NeuStar
Legal Department
1800 Sutter Street, Suite 780
Concord, CA 94520

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2006-0367

MCImetro Access Transmission Services, LLC d/b/a Verizon Access
Transmission Services

From: Sara Buyak
Telecommunications Department

William Voight 3-30-06

William Haas 3-30-06

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: March 30, 2006

On March 23, 2006, MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services (Verizon) filed a request for additional numbering resources with the Missouri Public Service Commission (Commission). Verizon 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 a customer. Verizon's customer is requesting two blocks of 1,000 Direct Inward Dial (DID) contiguous numbers in the St. Louis rate center to support a new PBX system. Verizon included in its filing a copy of the Central Office Code (NXX) Assignment Request – Part 1A (Part 1), State of Missouri Certificate of Good Standing, Form U1 – Utilization Report, Pooling Administrator's Response/Confirmation, , and a letter from the customer.

Background

On March 16, 2006, Verizon submitted an application to the Pooling Administrator for two blocks of 1,000 numbers in the St. Louis rate center. The Pooling Administrator denied the request for two blocks of 1,000 telephone numbers because Verizon's utilization rate of 67.850% did not meet the required utilization level of 75%.¹

The Telecommunications Department Staff (Staff) reviewed the utilization data that Verizon submitted to the Pooling Administrator in the CO assignment form. Verizon's utilization level of 67.850% 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

¹ Administrator's Response/Confirmation, remarks, DR 11, March 27, 2002.

Central Office Code (NXX) Assignment Guidelines, November 21, 2003.

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

Recommendation

Verizon does not have two blocks of 1,000 DID contiguous numbers in the St. Louis rate center to meet a specific request of their customer. Although Verizon does not meet the required utilization rate of 75%, Verizon has demonstrated a verifiable need for two blocks of 1,000 additional numbers in the St. Louis rate center. Staff recommends the Commission reverse the decision by Neustar to withhold the numbering resources to serve Verizon's request. Therefore, the Staff recommends language in the Commission's order be substantially as follows:

1. Grant Verizon's request for two blocks of 1,000 DID contiguous numbers for the requested telephone number of (314) ranging between 1000-7999 in the St. Louis rate center.
2. Request Verizon to return any unused telephone numbers to the Pooling Administrator.

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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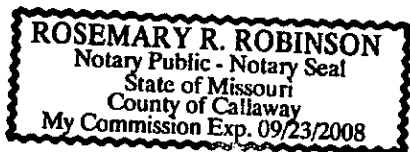
AFFIDAVIT OF Sara Buyak


STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Sara Buyak, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in the preparation of 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 30th day of March, 2006
I am commissioned as a notary public within the County of Cole, State of Missouri
and my commission expires on 9-23-2008




NOTARY PUBLIC