

**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)	

STAFF RECOMMENDATION

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 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, 2008.

10. Staff has considered the response filed by AT&T on August 22, the letter submitted by SSM on September 9, and the responses to Staff's questions provided by SSM on September 17.

11. Based on the additional information it has received since filing its initial recommendation, Staff has amended its recommendation. Staff's amended recommendation is attached hereto and is labeled Attachment A.

12. For the reasons set forth in Attachment A, Staff recommends that the Commission grant AT&T's request for three blocks of 1,000 MCA telephone numbers in

the Fenton rate center and further recommends that Staff deny AT&T's request for one additional block of 1,000 numbers.

13. Without an order from the Commission partially approving AT&T's request and allowing the company to receive three 1,000-number blocks in the Fenton rate center, AT&T will be unable to meet the needs of its customer. The Staff recommends that the Commission issue an order partially overturning the Pooling Administrator's decision and grant AT&T three 1,000-blocks of numbers in the Fenton rate center. Staff further recommends that the Commission issue an order denying in part AT&T's request.

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

- (1) grants in part and denies in part AT&T's request for four blocks of 1,000 MCA telephone numbers in the 636 area code within the range of 2000, 3000, 4000, or 5000.
- (2) grants AT&T three blocks of 1,000 MCA telephone numbers in the Fenton rate center and denies AT&T the additional one block of 1,000 MCA telephone numbers in the Fenton rate center that it has requested.

Respectfully submitted,

/s/ Jennifer Heintz

Jennifer Heintz

Senior Counsel

Missouri Bar No. 57128

Attorney for the Staff of the
Missouri Public Service Commission

PO Box 360

Jefferson City, MO 65102

(573) 751-8701 (Telephone)

(573) 751-9285 (Fax)

jennifer.heintz@psc.mo.gov

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 25th day of September 2008.

/s/ Jennifer Heintz

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2009-0014
Company Name: AT&T

From: Sara Buyak
Telecommunications Department

John Van Eschen 9-25-08
Utility Operations Division/Date

Jennifer Heintz 9-25-08
General Counsel's Office/Date

Subject: Staff's response to AT&T's and SSM St. Clare Health Center

Date: September 25, 2008

On August 22, 2008, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T) responded to the Missouri Commission Staff's (Staff's) August 18, 2008 recommendation. On September 9, 2008, AT&T filed a supplemental response containing a letter from SSM St. Clare Health Center (St. Clare).

In response to these filings Staff requested and received additional information from AT&T and St. Clare. St. Clare provided more detailed information about the total number of telephone numbers that will immediately be used. In response to a request for clarification of how St. Clare intends to use all four blocks of numbers in a relatively short period, St. Clare simply stated it is committed to having one consistent three digit prefix for all telephone numbers used for future campus expansion. If St. Clare's request is approved St. Clare intends to lease all four blocks of telephone numbers even though not all the telephone numbers will be in service. St. Clare intends to pay AT&T a monthly fee per group of 100 numbers.

The customer explained an intended use of a portion of the numbers is to create an easier dialing plan for callers to reach patients at the health center. St. Clare also intends to use numbers for such things as physician offices, staff use, administration use, fax machine use, wireless handset use and for the use by a secondary data center. From Staff's perspective, the customer has demonstrated an immediate need for 2,000 telephone numbers. In this respect, there is no question the customer should be granted two blocks of one-thousand telephone numbers. The customer claims they will eventually use all 4,000 telephone numbers by building an additional 150-plus bed tower, a second multi-story medical office building; plus St. Clare also indicates the surgery center and emergency department were designed to accommodate potential expansion. In response to a subsequent Staff question as to how the 4,000 numbers will be used in a relatively short period, St. Clare responded that it is not sure it can answer this question at this time.

With this additional information, Staff acknowledges additional numbers may be necessary to accommodate future expansion. In this respect Staff amends its original recommendation, which was to grant 2 blocks of one-thousand telephone numbers. Instead, Staff recommends the Commission grant AT&T 3 blocks of one-thousand MCA telephone numbers in the Fenton rate center. Such blocks should be in the 636 area code within the range of 2000, 3000, 4000 or 5000.

AT&T claims that prior numbering requests have involved customers who use 500 or fewer telephone numbers within a one-thousand block of numbers; however, in those cases the company requested, or Staff recommended that only the maximum number of blocks be opened to accommodate the request. For instance, to accommodate a request for 100 numbers, it would be necessary to open one thousands-block. This pending request involves opening multiple blocks of one-thousand numbers whereby the customer specifically intends to only initially use a portion of numbers within each block. Perhaps the request most similar to the pending request is from Case No. TO-2002-481, whereby GTE Midwest Incorporated d/b/a Verizon Midwest asked the Commission to reverse a North American Number Plan Administrator's Decision to Withhold Numbering Resources in response to a numbering request of Kanakuk Kamps. This customer requested 4 blocks of one-thousand telephone numbers but intended to only use 500 telephone numbers out of each block. The Commission ultimately ordered Verizon to assign 2 blocks of one-thousand telephone numbers, in contrast to Kanakuk Kamp's request for 4 blocks of one-thousand telephone numbers.

In summary, Staff amends its original recommendation and recommends the Commission grant AT&T 3 blocks of one-thousand telephone numbers. Therefore, Staff recommends the Commission issue an order that:

- (1) grants in part and denies in part AT&T's request for 4 blocks of one-thousand MCA telephone numbers in the 636 area code within the range of 2000, 3000, 4000 or 5000.
- (2) grants AT&T 3 blocks of one-thousand MCA telephone numbers in the Fenton rate center and denies AT&T the additional 1 block of one-thousand MCA telephone numbers in the Fenton rate center.

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

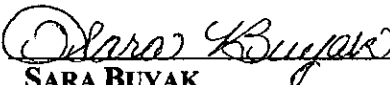
In the Matter of the Application of)
Southwestern Bell Telephone Company)
d/b/a AT&T Missouri For Review and)
Reversal Of The North American Number)
Plan Thousands-Block Pooling)
Administrator's Decision to Withhold)
Numbering Resources)

Case No. TO-2009-0014

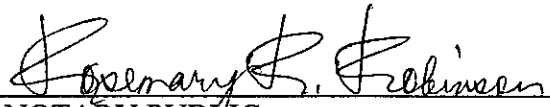
AFFIDAVIT OF Sara Buyak

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 25th day of September, 2008.


NOTARY PUBLIC

