

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

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| 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 Plan Thousands-Block Pooling) | Case No. TO-2009-0213 |
| 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 November 20, 2008, Southwestern Bell Telephone Company d/b/a AT&T Missouri filed an Application and Motion for Expedited Treatment under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Missouri Public Service Commission review and reverse a decision of the North American Numbering Plan Thousands-Block Pooling Administrator (Pooling Administrator), NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri.

2. On December 12, 2008, the Staff filed its second motion for an extension of time in which the Staff explained that AT&T Missouri had requested and was waiting for information from a third party. With its receipt of this information, the Staff is able to recommend that AT&T's request for a block of one thousand numbers can be met from an already open NXX code instead of opening a new NXX code.

3. The Pooling Administrator denied AT&T Missouri's request because AT&T did not meet the 75% utilization criterion required by FCC guidelines. The Commission may overturn the Pooling Administrator's decision to withhold numbering resources from AT&T

Missouri if the Commission determines that the Company 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 AT&T Missouri has met this standard. The Staff explains that AT&T Missouri needs the additional numbering resources for a local routing number (LRN) in the Puxico West wire center of the Puxico rate center.

WHEREFORE, the Staff recommends that the Commission issue an order that:

- (1) determines 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 ATT's request for one block of one thousand numbers in the 573 NPA in the 343 NXX within the XXXX range of 1000 through 1999 in the Puxico rate center.

Respectfully submitted,

/s/ William K. Haas

William K. Haas
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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 17th day of December 2008.

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2009-0213
Company Name: AT&T Missouri (AT&T)

From: Sara Buyak
Telecommunications Department

William Voight 12-17-08
Utility Operations Division/Date

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

Date: December 17, 2008

Summary

On November 20, 2008, AT&T filed a request to review and reverse a decision of the North American Numbering Plan Administrator (Pooling Administrator) for 1 block of one-thousand telephone numbers in the Puxico rate center. AT&T requests 1 block of one-thousand consecutive telephone numbers to facilitate the provisioning of local number portability (LNP). This memorandum recommends approval of AT&T's request. Included in AT&T's filing is the Thousand-Block Application Form (Part 1 A), Months to Exhaust Utilization Certification Worksheet, Pooling Administrator's Response/Confirmation (Part 3), a letter from Ms. Rozlynn Q. Davis, Manager, AT&T Network Operations Center, and AT&T's Number Utilization Form (Exhibit E).

Background

On October 29, 2008, AT&T submitted a request to the Pooling Administrator for 10,000 telephone numbers (an NXX code). In order for AT&T to get a local routing number (LRN), a code would need to be opened specifically for the Puxico West rate center. On October 29, 2008, the Pooling Administrator denied the request because AT&T did not meet the utilization criteria.

The Telecommunications Department Staff (Staff) reviewed the Months to Exhaust and Utilization Certification Worksheet that AT&T submitted to the Pooling Administrator. AT&T's utilization rate is 42.429%. The utilization rate must be 75% which is required by the FCC guidelines before a request for additional numbering resources is permissible as set forth in Regulation 47-CFR 52.15 (6) (A) (iii).¹

¹ Code of Federal Regulations Title 47-Telecommunication Chapter I – Federal Communications Commission, Subchapter B – Common Carrier Services, Part 52 Numbering.

AT&T does not meet the utilization requirements for additional telephone numbers as set forth in the FCC guidelines. AT&T does have in its inventory 1 block of one-thousand telephone numbers for the Puxico rate center; however the Puxico West rate center requires a separate LRN for efficiency and to offer broadband. This requires the Puxico West rate center to have an LRN associated with an NXX that is different than the NXX for the Puxico Main rate center. AT&T's filing requests 1 block of one-thousand telephone numbers within the range of 573-NXX-1000 through 573-NXX-1999. Staff has requested AT&T to use the one thousands block in the already opened 343 NXX within the 573 NPA to designate as an LRN. AT&T has reserved this block.

Recommendation

Since AT&T does not have numbering resources for a LRN in the Puxico West rate center and the utilization rate is 42.429%, Staff has determined that AT&T has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies. Staff recommends the Commission issue an order overturning the decision of the Pooling Administrator by granting AT&T 1 block of one-thousand telephone numbers in the 573 NPA in the 343 NXX within the XXXX range of 1000 through 1999. Specifically, Staff recommends the Commission's order include a statement substantially as follows:

1. AT&T's request for 1 block of one-thousand telephone numbers in the 573 NPA in the 343 NXX within the XXXX range of 1000 through 1999 in the Puxico rate center 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, paying the PSC assessment, MoUSF, and Relay.

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

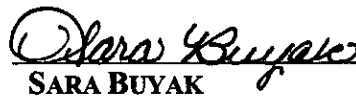
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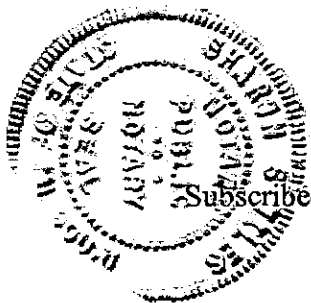
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AFFIDAVIT OF Sara Buyak

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

17th, day of December 2008


NOTARY PUBLIC

