

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

In the Matter of the Application of Embarq)
Missouri, Inc. d/b/a CenturyLink for Review)
And Reversal of North American Number Plan)
Thousands-Block Pooling Administrator's)
Decision to Withhold Numbering Resources)

File No. TO-2017-0017

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and
for its Recommendation in this matter states as follows:

1. On July 15, 2016, Embarq Missouri, Inc. d/b/a CenturyLink ("Embarq") filed an application under 47 C.F.R. 52.15(g)(3)(iv) requesting that the Commission review and reverse a decision of the North American Numbering Plan Administrator, NeuStar, Inc., to withhold certain numbering resources from AT&T Missouri in the Lebanon, Missouri rate center to meet the needs of the Lebanon R-III School District. More specifically, the requested resources consist of one 1000-block of Direct Inward Dial telephone numbers beginning with 417-654-7000 or similar.

2. Embarq states that it does not have the numbers available for assignment in the Lebanon rate center to meet the needs of the Lebanon R-III School District. NANPA denied Embarq's request for the additional telephone numbers based on Embarq's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Embarq Missouri may very well have the available telephone numbers to assign to the Lebanon R-III School District; however, said numbers do not meet the required criteria.

3. Embarq provided the Staff with its telephone number utilization for the Kansas City rate center. The Staff has examined Embarq's request and supporting documentation. In the Staff's opinion, Embarq has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Embarq's request and order a reversal of the NANPA decision to deny the additional numbers for the Lebanon R-III School District.

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

- (1) Determines Embarq has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies; and
- (2) Overturns the decision of the Pooling Administrator and grants Embarq's request for telephone numbers in the Lebanon rate center, and
- (3) Contains the following language:

Embarq Missouri, Inc. d/b/a CenturyLink's request for one thousand-block of Direct Inward Dial telephone numbers beginning with 417-654-7000 or similar in the Lebanon, Missouri rate center is granted.

Respectfully submitted,



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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 29th day of July, 2016.

A handwritten signature in black ink, appearing to be "Allan D. [unclear]", is written above the line.

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2017-0017

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve CenturyLink's Request for Additional Numbering Resources to accommodate the needs of the Lebanon R-III School District in the Lebanon rate center.

Date: July 28, 2016

On July 15th, Embarq Missouri, Inc. d/b/a CenturyLink (CenturyLink) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Thousands-Block Pooling Administrator (NANPA) to withhold and deny CenturyLink's request for additional telephone numbering resources in the Lebanon, Missouri telephone rate center (Application). According to CenturyLink, Lebanon R-III School District (Lebanon R-III) is in the process of implementing a new telecommunications system that has the capability to provide direct-inward-dialing (DID). They currently have a patchwork of DID numbers that were assigned over time and changing the numbers to a sequential numbering plan will be more efficient, easier to use and will provide easier assignment for emergency response location. To accommodate its needs, Lebanon R-III is in need a block of 1,000 consecutive numbers beginning with 417-654-7000 or similar.

According to its Application, CenturyLink states that it does not have the numbers available for assignment in the Lebanon rate center to meet the needs of Lebanon R-III. CenturyLink requests the Commission to override the NANPA's denial of CenturyLink's request for the additional telephone numbers, which denial was based on CenturyLink's inability to meet the guidelines pertaining to current telephone number utilization. In other words, CenturyLink may very well have the available telephone numbers to assign to Lebanon R-III; however, said numbers are not in sequential order.

In support of its Application, CenturyLink provided copies of its request to the NANPA and subsequent denial by the NANPA. Additionally, CenturyLink provided Staff highly confidential copies of its telephone number utilization for the Lebanon rate center. The Staff has examined CenturyLink's request and supporting documentation.

The Staff has examined CenturyLink's request and in the Staff's opinion, CenturyLink's application complies with the requirements of 4CSR240-37.040. CenturyLink has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve CenturyLink's request and order a reversal of the NANPA decision to deny the additional numbers for Lebanon R-III.

Specifically, the Staff recommends the Commission's order include a statement substantially as follows:

Grant CenturyLink's request for one thousands-block beginning with 417-654-7000 or similar within the Lebanon, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyLink's original request.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined CenturyLink's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

Under penalty of perjury, I affirm that the above statement is true and correct.

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KARI SALSMAN