

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. CO-2012-0151

From: Kari Salsman
William Voight
Telecommunications Unit

Subject: Staff's Recommendation to Approve Windstream Nuvox Missouri's Request for Additional Numbering Resources to accommodate the needs of Cox Health Systems in the Springfield rate center.

Date: November 22, 2011

On November 14th, Windstream Nuvox Missouri (Windstream-NuVox) filed a request for the Missouri Public Service Commission (Commission) to reverse a decision by the North American Numbering Plan Administrator (NANPA) to withhold and deny Windstream-NuVox's request for additional telephone numbering resources in the Springfield, Missouri telephone rate center (Application). According to Windstream-NuVox', Cox Health Centers (Cox Health), is experiencing significant growth of Cox Health's operations at its Cox South medical campus and at other locations in Springfield. Cox Health is building two new facilities on its Cox South medical campus and additionally, a new Home Parental and Home Support facility and a new College School of Nursing are also being constructed. Sufficient numbering resources are critical to the successful delivery of health care services at these locations. Given its new and renovated facilities, regular growth patterns and the continued growth generally within the health care industry, it is believed Cox Health needs an additional 5,000 consecutive numbers in order to support this growth in a manner consistent with its coordinating dialing plan for the present and future growth. Cox Health wishes to maintain their current 6-digit dialing pattern. To accommodate its needs, Cox Health is in need of five (5) one-thousand number blocks from which consecutive numbers can be drawn in the Springfield rate center.

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

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

The Staff has examined Windstream-NuVox's request and in the Staff's opinion, Windstream-NuVox has demonstrated a verifiable need for the additional telephone numbers. The Staff recommends the Commission approve Windstream-NuVox's request and order a reversal of the NANPA decision to deny the additional numbers for Cox Health.

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

Windstream-NuVox's request for five (5) one-thousand number blocks from which consecutive numbers can be drawn in the Springfield Missouri rate center is granted.

The Staff is unaware of any other matter that affects, or that would be affected by, this matter. Lastly, the Staff has examined Windstream-NuVox'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.



KARI SALSMAN