

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

In the Matter of the Application of Windstream)
Missouri, LLC for Review and Reversal of the)
Decision of Neustar, Inc. as the Pooling)
Administrator to Withhold Numbering Resources)

File No. TO-2017-0021

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 20, 2016, Windstream Missouri, LLC (“Windstream”) 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 Windstream in the Florence and Iberia, Missouri rate centers needed to support the deployment of its Broadband Stimulus project supported by the Connect America Fund (“CAF2”). More specifically, Windstream is installing new switches and requires a unique Location Routing Number (LRN) to identify each recipient switch or point of interface and must establish one LRN per LATA from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain separate LRN’s for each of these two new packet switches. Only an NXX code holder can obtain an LRN which necessitates Windstream’s request for two separate NXX codes, one each for the Florence and Iberia rate centers. Windstream will retain only single thousand number- blocks from each of these new NXX codes.

2. Windstream states that it does not have any NXX codes that could be moved for the purpose of establishing an LRN, nor does it have clean one- thousand number blocks that could be intra-service provider ported to the new switches. Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the CAF2 project.

3. Windstream provided the Staff with its telephone number utilization for the Florence and Iberia rate centers. The Staff has examined Windstream's request and supporting documentation. In the Staff's opinion, Windstream has demonstrated a verifiable need for the additional routing and telephone numbers. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers.

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) Overturns the decision of the Pooling Administrator and grants AT&T Missouri's request for telephone numbers in the listed rate centers, and

(3) Contains the following language:

Windstream's request for two LRNs and two NXXs, in the Florence and Iberia, Missouri rate center are granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.

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 28th day of July, 2016.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. TO-2017-0021

From: Kari Salsman
John VanEschen
Telecommunications Department

Subject: Staff's Recommendation to Approve Windstream Missouri's Request for Additional Numbering Resources to accommodate the deployment of a Broadband Stimulus Project.

Date: July 28, 2016

On July 20th, Windstream Missouri (Windstream) 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's request for additional telephone numbering resources in the Florence and Iberia, Missouri telephone rate centers (Application). According to Windstream, additional numbering resources are necessary to support the deployment of a Broadband Stimulus project, which is being funded with support from the Connect America Fund Phase 2 (CAF2). Windstream is installing new packet switches and must establish a unique Location Routing Number (LRN) to identify each recipient switch or point of interface and must establish one LRN per LATA from an assigned NXX for each recipient switch in the number portability capable network. Thus, Windstream must obtain separate LRN's for each of these three new packet switches. Only an NXX code holder can obtain an LRN which necessitates Windstream's request for two separate NXX codes, one each for the Florence and Iberia rate centers. Windstream will retain only single thousand-number-blocks from each of these new NXX codes.

According to its Application, Windstream states that it does not have any NXX codes that could be moved for the purpose of establishing an LRN, nor does it have clean one thousand number blocks that could be intra-service provider ported to the new switches. Windstream requests the Commission to override the NANPA's denial of Windstream's request for the additional telephone numbers, which denial was based on Windstream's inability to meet the guidelines pertaining to current telephone number utilization. In other words, Windstream may very well have the available telephone numbers; however, said numbers do not satisfy the needs for the CAF2 project.

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

The Staff has examined Windstream's request and in the Staff's opinion, Windstream has demonstrated a verifiable need for the additional telephone numbers and complies with the

requirements of 4CSR240-37.040. Last month the Commission approved a similar request by Windstream to support a CAF2 project in case IO-2016-0344. The Staff recommends the Commission approve Windstream's request and order a reversal of the NANPA decision to deny the additional numbers for the Broadband Stimulus project.

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

Windstream's request for two LRNs and two NXXs, in the Florence and Iberia, Missouri rate center are granted. The Commission further determines that if a new code is required to be opened for this occasion, Windstream shall utilize one block of one thousand numbers from each code and return the remaining nine blocks to the Pooling Administrator.

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

Kari Salsman
KARI SALSMAN