

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

In the Matter of the Application of CenturyTel of Missouri, LLC 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-2015-0217**  
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**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 March 6, 2015, CenturyTel of Missouri, LLC, d/b/a CenturyLink 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 Kansas City, Missouri rate center. More specifically, the requested resources consist of three consecutive 1000-blocks of Direct Inward Dial telephone numbers that are from (573)607-3000 to (573)607-5999, to meet the needs of Columbia Public School’s E911 implementation.

2. CenturyLink states that it does not have the numbers available for assignment in the Columbia rate center to meet the needs of Columbia Public Schools. NANPA denied CenturyLink’s request for the additional telephone numbers based on CenturyLink’s inability to meet the guidelines pertaining to current telephone number utilization. In other words, CenturyLink Missouri may very well have the available

telephone numbers to assign to Columbia Public Schools; however, said numbers do not meet the required criteria.

3. CenturyLink provided the Staff with its telephone number utilization for the Kansas City rate center. The Staff has examined CenturyLink's request and supporting documentation. In the Staff's opinion, 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 Columbia Public Schools.

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

(1) Determines CenturyLink 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 CenturyLink's request for telephone numbers in the Columbia rate center, and

(3) Contains the following language:

CenturyLink's request for three consecutive 1000-blocks of Direct Inward Dial telephone numbers that are from (573)607-3000 to (573)607-5999 in the Columbia, Missouri rate center is granted.

Respectfully submitted,



Colleen M. Dale  
Senior Counsel  
Missouri Bar No. 31624  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-4255 (Telephone)  
[cully.dale@psc.mo.gov](mailto:cully.dale@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 13<sup>th</sup> day of March, 2015.

A handwritten signature in black ink, appearing to be "Allan D. [unclear]".

# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. TO-2015-0217

**From:** Kari Salsman  
Telecommunications Unit  
John VanEschen  
Tariff, Safety, Economic and Engineering Analysis

**Subject:** Staff's Recommendation to Approve CenturyLink's Request for Additional Numbering Resources to accommodate the needs of Columbia Public Schools in the Columbia rate center.

**Date:** March 12, 2015

On March 6<sup>th</sup>, CenturyTel of Missouri, LLC 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 Columbia, Missouri telephone rate center (Application). According to CenturyLink, Columbia Public Schools (CPS) is in the process of implementing a new E911 system, which will allow 911 Services to be notified of what specific building and room from which an emergency call is placed. The new emergency 911 system requires CPS to have direct-inward-dialing associated with every phone extension in the district. To accommodate its needs, CPS is in need of three consecutive 1000-blocks of Direct Inward Dial telephone numbers. According to CPS the ability to have 3000 consecutive numbers will allow for a more logical E911 implementation.

According to its Application, CenturyLink states that it does not have the numbers available for assignment in the Columbia rate center to meet the needs of CPS. 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 CPS; however, said numbers are not in sequential order. CenturyLink has researched the thousand blocks available within the Columbia rate center and recommends the assignment of three thousand numbers from (573) 607-3000 to (573) 607-5999.

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 Columbia rate center. The Staff has examined CenturyLink's request and supporting documentation.

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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 CPS.

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

Grant CenturyLink's request for three thousand numbers from (573) 607-3000 to (573) 607-5999 or any other three consecutive blocks of a thousand numbers within the Columbia, 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