

**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	)	<b><u>File No. TO-2017-0140</u></b>
Thousands-Block Pooling Administrator's	)	
Decision to Withhold Numbering Resources	)	
	)	

**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 November 14, 2016, CenturyTel of Missouri, LLC d/b/a CenturyLink ("CenturyTel") 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 CenturyTel in the Dardenne, Missouri rate center to meet the needs of SSM Healthcare in Lake St. Louis. More specifically, the requested resources consist of one 500 consecutive Direct Inward Dial telephone numbers in the 636 area code.

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

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

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

- (1) Determines CenturyTel 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 CenturyTel's request for telephone numbers in the Lebanon rate center, and
- (3) Contains the following language:

Grant CenturyLink's request for 500 consecutive numbers within the NPA-NXX of 636-755, beginning with 6, in the Dardenne, Missouri rate center. This decision reverses a recent decision by the North American Numbering Plan Thousands-Block Pooling Administrator denying CenturyLink's original request.

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 28<sup>th</sup> day of November, 2016.

A handwritten signature in black ink, appearing to be "Allan" followed by a stylized flourish.

# MEMORANDUM

**To:** Missouri Public Service Commission Official Case File  
Case No. TO-2017-0140

**From:** Kari Salsman  
John VanEschen  
Telecommunications Department

**Subject:** Staff's Recommendation to Approve CenturyTel of Missouri, LLC d/b/a CenturyLink Request for Additional Numbering Resources to accommodate the needs of SSM Healthcare in the Dardenne rate center.

**Date:** November 28, 2016

On November 14, 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 the request of CenturyLink for additional telephone numbering resources in the Dardenne, Missouri telephone rate center (Application). According to CenturyLink, SSM Healthcare (SSM) is expanding its patient care facility at the Lake St. Louis location to include 80 additional inpatient rooms and support departments. With this expansion, SSM is in need of additional numbering resources. To accommodate its needs, SSM is in need of 500 consecutive direct inward dial numbers and requests numbers within the NPA-NXX of 636-755, beginning with 6.

According to its Application, CenturyLink states that it does not have the numbers available for assignment in the Dardenne rate center to meet the needs of SSM and 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 SSM; 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 Dardenne rate center. The Staff has examined the request of CenturyLink 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 SSM.

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

Grant CenturyLink's request for 500 consecutive numbers within the NPA-NXX of 636-755, beginning with 6, in the Dardenne, 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.

A handwritten signature in cursive script, reading "Kari Salsman", is positioned above a horizontal line.

KARI SALSMAN