

BEFORE THE PUBLIC SERVICE COMMISSION
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) Case No. _____
Thousands-Block Pooling Administrator's Decision)
to Withhold Numbering Resources.)

**CENTURYTEL OF MISSOURI, LLC d/b/a CENTURYLINK'S
APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW CenturyTel of Missouri, LLC d/b/a CenturyLink (CenturyLink) and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. (NANPA), to withhold certain numbering resources from CenturyLink. CenturyLink files this verified Application and Motion for Expedited Treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(14), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv). The requested numbering resources are necessary to meet the needs of SSM Healthcare in Lake St. Louis, Missouri when it expands its existing system during an expansion of its patient care facility. The resources requested consist of 500 consecutive direct-inward-dial (DID) telephone numbers in the 636 area code.

In support of this Application, CenturyLink states as follows:

1. CenturyLink is a Louisiana limited liability corporation that is duly authorized to do business in the State of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of CenturyLink's Certificate of Authority to transact business in Missouri from the

Missouri Secretary of State were filed in Case No. TM-2002-232,¹ and are incorporated herein by reference pursuant to 4 CSR 240-2.060(1)(G).

2. All correspondence, pleadings, orders, decisions, and communications regarding this matter should be sent to:

Becky Owenson Kilpatrick
100 CenturyLink Drive
Monroe, LA 71203
Phone: 318.340.5027
becky.kilpatrick@centurylink.com

3. There are no pending actions or final unsatisfied judgments or decisions against CenturyLink from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this petition. Nor are any annual reports or assessment fees overdue.

4. SSM Healthcare is expanding its patient care facility in Lake St. Louis, Missouri to include 80 additional inpatient rooms and the support departments in second quarter 2017. At that time, it will need a large range of DID numbers to streamline the handling of incoming calls. SSM Healthcare has specifically requested a block of 500 consecutive DID numbers for this purpose. Adding sequential numbering will be more efficient, easier to use and will provide easier assignment for emergency response location.²

¹ *In the Matter of the Joint Application of GTE Midwest Incorporated, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri: 2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) to Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) to Designate CenturyTel of Missouri, LLC, as a Telecommunications Carrier Eligible to Receive Federal Universal Support*, Case No. TM-2002-232.

² A copy of the Customer Request to CenturyLink is attached hereto and marked as Exhibit A.

5. CenturyLink has researched the available thousand-blocks in its Dardenne rate center (DRDNMOXARS1) which serves this customer. CenturyLink has no thousands-blocks available for use from which to draw the requested sequential numbering resources that would meet SSM Healthcare's needs. As a result of this research, CenturyLink requests that the Commission grant it numbering resources with the NPA-NXX of 636-755, beginning with 6 as requested.

6. On November 10, 2016, CenturyLink submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet SSM Healthcare's needs.³ CenturyLink completed the Thousands-Block Application Form in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet.⁴

7. On or about November 10, 2016, NANPA denied the requests on the grounds that CenturyLink had not met the utilization criteria.⁵

8. CenturyLink seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases where customers have required a large amount of sequential numbers and it should likewise do so here.

9. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000 *Order* in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory

³ A copy of the Application Form, Part 1A is attached hereto and is marked as Exhibit B.

⁴ A copy of the Months to Exhaust and Utilization Certification Worksheet is attached hereto and marked as Exhibit C.

⁵ A copy of this decision is attached hereto and marked as Exhibit D.

commission and a state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources.⁶ Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁷ Moreover, the FCC determined that states may overturn NANPA's decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request.⁸

10. The FCC further explained in its March 31, 2000 *Order* that a "[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers."⁹ Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated "in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests."¹⁰

11. Further, this Application complies with 4 CSR 240-37.040. CenturyLink has attached hereto its "Months to Exhaust Worksheet" indicating the utilization for the Dardenne rate center encompassing the preceding six months and projected monthly utilization for the next twelve months.¹¹ CenturyLink has also attached its most recently

⁶ 15 FCC Rcd. 7574, *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rule Making, CC Docket No. 99-200 (rel Mar. 31, 2000), Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

⁷ *Id.*

⁸ *In the Matter of Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration, CC Docket No. 99-200, et al., (rel. Dec. 28, 2001), para. 64; *see also*, 47 CFR 52.15(g)(4).

⁹ *Id.*

¹⁰ *Id.*, at para. 66.

¹¹ See Exhibit C.

filed FCC Form U1 of Form 502 for the Dardenne rate center.¹² Finally, CenturyLink attaches copies of its originally-filed requests to NANPA and NANPA's denial of those requests.¹³ These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein. In connection with this request, CenturyLink has exhausted all other available remedies designed to conserve numbering resources.

12. CenturyLink seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. In order to accommodate SSM Healthcare's needs, the Commission must issue its order as soon as possible so that CenturyLink will have enough time to file a new request with NANPA for the release of the numbering resources to CenturyLink described herein, both to meet SSM Healthcare's needs but also so that CenturyLink and other telecommunications service providers that provide service via a switch can get the necessary programming completed on a timely basis. CenturyLink filed this request for expedited treatment as soon as reasonably possible after the rejection by NANPA and the determination that there was not another feasible alternative.

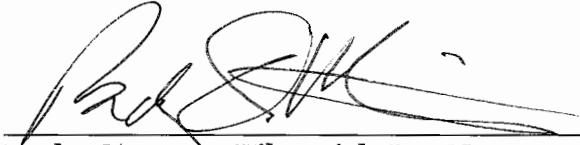
WHEREFORE, CenturyLink respectfully requests that the Commission overturn NANPA's previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources

¹² The portions of FCC Form U1 of Form 502 pertaining to the Dardenne rate center are attached hereto and marked as Exhibit E (HC) as it contains exchange specific customer numbers. Please note that this file is a copy of the electronic submission that is now required by the Administrator and no longer carries the headings of the paper form that was formerly utilized by the Administrator.

¹³ See Exhibits B and D.

described herein to meet the telecommunications needs of SSM Healthcare in Lake St. Louis, Missouri.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Becky Kilpatrick', written over a horizontal line.

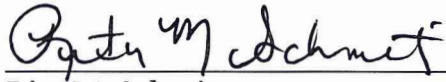
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*Attorney for CenturyTel of Missouri, LLC
d/b/a CenturyLink*

VERIFICATION

STATE OF WISCONSIN)
) ss.
COUNTY OF LA CROSSE)

I, Rita M. Schmitz, of lawful age, and being first duly sworn, now state: I am an Analyst II for CenturyLink, and have read the foregoing and verify the statements contained therein to be true and correct to the best of my knowledge and belief.



Rita M. Schmitz

Subscribed and sworn to before me
this 14th day of November, 2016.



Notary Public

Sarah Dettmering

My commission expires: 10/2/20

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of November, 2016, a copy of the foregoing document and attachments were served via electronic mail, facsimile or U.S. Mail, postage prepaid to each of the following:

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Missouri Public Service Commission
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Jefferson City, MO 65102
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