

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

In the Matter of the Application of Southwestern	)	
Bell Telephone Company d/b/a AT&T Missouri	)	
For Review and Reversal Of North American	)	Case No. TO-2009-0014
Number Plan Thousands-Block Pooling	)	
Administrator's Decision to Withhold Numbering	)	
Resources	)	

**AT&T MISSOURI'S RESPONSE TO STAFF'S RECOMMENDATION**

AT&T Missouri<sup>1</sup> respectfully offers this brief response to Staff's August 18, 2008 recommendation. Regrettably, the recommendation offers St. Clare Health Center ("St. Clare") only a portion of the numbers necessary to meet St. Clare's unique need -- to match each patient's telephone number with that patient's room number. Meanwhile, the recommendation fails to advance any tangible numbering resource benefit.

The recommendation repeatedly emphasizes that the Commission's prior numbering resource orders "did not result in contamination of thousands-blocks beyond that required to satisfy the quantity of telephone numbers requested by the customer." Staff Recommendation, Appendix A, at 2-3. However, sound numbering resource allocation policy should not altogether ignore qualitative considerations, like a customer's unique number resource needs. St. Clare has squarely stated that it is "requiring that the [Direct Inward Dial] numbers match the specific 4 digit patient room numbers at the new SSM St. Clare Health Center to create an easier dial plan for family members trying to reach patients." Application, Exhibit A. (emphasis added). In

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<sup>1</sup> Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

short, Staff has effectively substituted its own judgment for that of St. Clare as to how best to serve the needs of St. Clare's patients and their families.<sup>2</sup>

Moreover, the recommendation offers minimal countervailing numbering resource benefits. The number utilization percentage in the Fenton rate center at present is approximately 63.77%. Application, Exhibit C. Were the Commission to grant AT&T Missouri all of the relief it seeks on behalf of St. Clare, the resulting number utilization percentage would be approximately 62.64% (the sum of 28,696 and 2,000 [i.e., 30,696], divided by the sum of 45,000 plus 4,000 [i.e., 49,000]). The single percentage point difference hardly constitutes a material numbering resource benefit.

Finally, Staff focuses on the fact that St. Clare would only use 50% of the four thousands-blocks requested (i.e., 2,000 of 4,000). Staff Recommendation, Appendix A, at 2. As noted earlier, Staff's emphasis on "quantity" over "quality" is inappropriate. Regardless, other companies have offered no more, and sometimes, less use. Examples shown within Staff's own analysis include Holcim, Inc. (500 of 1,000), Boemler Chevrolet (100 of 1,000), Butler Chevrolet (100 of 1,000) and Hannibal-LaGrange College (300 of 1,000). *Id.*, at 2-3.

AT&T Missouri respectfully requests that the Commission consider these observations when considering the weight it should place on Staff's Recommendation.

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<sup>2</sup> Elsewhere, Staff ventures beyond mere quantitative assessments by making qualitative judgments which elevate business considerations over health care considerations. *See*, Staff Recommendation, Appendix A, at 3 ("The Lockton [insurance company] case represents an application whereby facsimile telephone numbers were matched to direct telephone numbers for business purposes, while the St. Clare application proposes to match telephone numbers with patient room numbers.").

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY  
D/B/A AT&T MISSOURI

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### **CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following  
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