

**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.)	

**MOTION OF AT&T MISSOURI FOR LEAVE TO FILE
SUPPLEMENTAL RESPONSE TO STAFF'S RECOMMENDATION**

COMES NOW AT&T Missouri¹ and, pursuant to Commission Rule 2.050(3) (4 CSR 240-2.050(3)), respectfully requests that the Commission grant it leave to file the attached September 9, 2008, letter from SSM Health Care as AT&T Missouri's supplemental response to Staff's recommendation. In support of this motion, AT&T Missouri states as follows:

1. On August 22, 2008, AT&T Missouri filed its response to Staff's recommendation.
2. SSM Health Care, on whose behalf AT&T Missouri made its request for additional numbering resources, today provided AT&T Missouri with the attached letter.
3. AT&T Missouri respectfully submits that there is good cause for the attached letter to be now included in the record of this case and made available to the Commission and its Staff for review and consideration. The letter, received today, speaks directly to considerations discussed in Staff's August 18 recommendation. It was not available to AT&T Missouri when AT&T Missouri filed its response to Staff's recommendation, but it is consistent with that response.

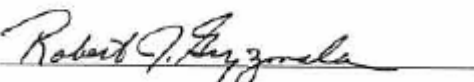
¹ Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

4. AT&T Missouri would have no objection to Staff's being permitted through and including September 19, 2008, in which to file a reply to this supplemental response, should Staff wish to file such a reply.

WHEREFORE, AT&T Missouri respectfully requests that the Commission grant it leave to file the attached September 9, 2008, letter as AT&T Missouri's supplemental response to Staff's recommendation.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

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CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on September 9, 2008.


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St. Joseph Hospital of Kirkwood

September 9, 2008

Jennifer Heintz, Senior Counsel, Missouri Bar # 57128
Attorney for the staff of the Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Dear Jennifer,

SSM St. Clare Health Center will open early next year. St. Clare will be the first hospital to be constructed in St. Louis County in more than 30 years, in what is predicted to be the next great growth area of the region. SSM's promise is to make this facility the hospital of the future. Through innovative technology and patient-friendly design, our goal is to create a breakthrough health care facility for St. Louis residents. Your decision in case TO-2009-0014 could affect how well we deliver this promise to our region.

As you know, SSM Health Care formally requested new telephone numbers for the St. Clare campus, which is located in Fenton. The local exchange carrier, AT&T, advised us that the numbers were unavailable in the existing MCA exchanges in the Fenton wire center, and that AT&T would make a request for a new exchange to the Public Service Commission (PSC). The PSC's staff recommendation to approve part (two blocks of 1,000 MCA telephone numbers) and deny part (two additional blocks of 1,000 MCA numbers) of the request based on immediate utilization does not fully take into consideration the continued expansion of medical construction planned for the St. Clare campus and the population growth expected in the southwest St. Louis County region.

We ask that you reconsider the partial denial and grant the additional two blocks of MCA numbers that were requested.

First, we would like to clarify two comments within the staff recommendation:

1. On page 2, paragraph 4, the staff incorrectly comments that "AT&T can meet the needs of the customer with two blocks of 1,000 telephone numbers rather than four."
2. In appendix A, page 3 (Case No. TO-2008-0196, item 3) the staff mentions that our application does not adequately explain how the remaining 1,760 telephone numbers will be utilized. Those numbers will be assigned as needed to doctors' offices, staff, administration, fax machines and other uses — and will become critically important when plans for an additional patient tower come to realization.

SSM St. Clare Health Center is located on a 53-acre tract that is ready for immediate expansion. Future plans call for an additional 150-plus bed tower and a second multi-story Medical Office Building. Both the surgery center and emergency department were designed to accommodate potential expansion to meet future growth needs.



St. Joseph Hospital of Kirkwood

The recommendation denial focuses on quantity of numbers, however we believe configuration of the numbers is a more important issue. For patient and visitor convenience, as well as efficiency, we want to configure patient telephone numbers to match patient room numbers. Not only has this approach become a standard operating procedure within health care, it simplifies the process for patients and families and supports our goal of delivering exceptional customer service. One key element of the breakthrough St. Clare model is its encouragement of family members and loved ones to be integrally involved in the healing process for their loved one. Configuring the four-digit phone number to the patient room would be a major enhancement to our patient-centered approach to care.

However, the only way to meet this objective is to provide the two additional blocks of numbers.

Much work has already been completed to match St. Clare's patient room numbers to other aspects of care. For example:

- The four-digit room number will be an integral part of the electronic health record for each patient
- The nurse call/locator system will use the room number for patient communication needs
- All clinical and support systems have been built around the specific four-digit room numbers.

We realize this is a large request for numbers, but in making your decision we ask that you please consider the future needs of this facility and the swiftly growing population it serves — the real potential of the southwest St. Louis County area to become the new “Chesterfield” in terms of development and population growth, and how large the St. Clare project could grow in the next five to ten years. St. John's Mercy Medical Center has an entire telephone exchange of numbers (10,000). While I do not see the need for an entire exchange at SSM St. Clare Health Center, we do expect the four blocks of numbers we request to be utilized in a relatively short period.

Thank you very much for kind consideration of this request.

Sincerely,

James M. Rogan
Sr. Telecom Systems Analyst
SSM Integrated Health Technologies
SSM St. Mary's Health Center
SSM St. Joseph's Hospital Kirkwood

Cc: Leighton Wassilak, SSM Information Systems Manager
Mr. Steven Timm, Healthcare, AT&T Southwest