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October 2, 2003

Mr. Dale Hardy Roberts
Secretary
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102

**RE: SBC REQUEST TO REVERSE NANPA'S DENIAL OF ASSIGNMENT OF
A SINGLE NXX FOR ST. JOHN'S MERCY MEDICAL CENTER**

Dear Mr. Roberts:

This letter is to advise the Public Service Commission that the Office of the Public Counsel supports SBC's request that the Commission direct the North American Numbering Plan Administrator (Neustar) to release a single "central office code" or "NXX" for use by SBC to serve St. John's Mercy Medical Center.

Public Counsel believes that the request has considerable merit as it advances the proper use of numbering resources and addresses the Medical Center's specific consumer needs to provide efficient and easy-to-use telecommunications service throughout the entire medical complex for the benefit of patients, visitors, administrative and medical personnel, and the general public. Granting the request is consistent with the public interest.

I have reviewed the October 1, 2003 letter from David D. Conover, Telecommunications Manager for St. John's Mercy Health Care, that outlines the Center's needs and plans for the purchase of SBC's Direct Inward Dial service that will use a central office code. With the proposed assignment of a single NXX code ending in the number 2 for internal switching purposes, the Medical Center can have a simple and

uniform numbering system and dialing plan throughout its complex, both now and in the future. I believe that the request is consistent with the promotion of the public interest and will not result in inefficient use of numbering resources nor will it cause premature exhaust of the 314 area code.

The benefits of granting the request can be summarized as follows:

- The planned use of the NXX is a practical use of numbering resources that saves consumers time and money and avoids confusion;
- This seamless, coordinated use of numbering resources and the switched telecommunications network advances the Medical Center's charitable and educational mission as a significant provider of medical and social services that benefits the health, safety, and welfare of Missouri residents and the general public;
- From a consumer perspective, it creates a logical system where phone numbers can be aligned with room numbers, an option unavailable with the present system of numbers from scattered central offices;
- It eliminates the need for dialing extension numbers affixed to the station phone number;
- The replacement of extensions with direct lines and the planned addition of new buildings to the complex assures that the Medical Center will grow into its 10,000 number allocation, thereby making efficient use of the NXX;
- With the expansion of the medical complex over the next few years, the resulting utilization level will match the utilization level as SBC was projected to achieved by that time
- Because the Medical Center has committed to return for reassignment the more than 3,200 numbers now assigned, the request is consistent with number conservation principles of recovery of unused resources.

Nuestar's denial was based on a technical application of the number utilization threshold guidelines. The review process allows the Commission to override the administrator when the strict application of the guidelines would not be proper and in keeping with the public interest. This is an appropriate case for the Commission to exercise its authority.

For these reasons, Public Counsel suggests to the Commission that the granting of this request for St. John's Mercy Medical Center is consistent with number conservation goals, provides a needed numbering resources for the Medical Center, will result in a benefit to consumers and to the public, and is otherwise consistent with the public interest.

Very truly yours,

A handwritten signature in black ink, appearing to read "Barbara Meisenheimer".

Barbara A. Meisenheimer
Chief Utility Economist

cc: John B. Coffman
St. John's Mercy Medical Care
SBC

APPENDIX TO MEISENHEIMER LETTER SUPPORTING NXX REQUEST

Brief overview of the North American Numbering Plan and the current Missouri number assignment.

Under its current configuration, a typical phone number is a 10-digit number of the form NPA - NXX -XXXX. The first three digits represent the “Numbering Plan Area” more commonly known as the “area code.” The next three digits represent the “NXX” or “central office” code for which “N” is a digit from the set 2-9 and “X” represents a digit from the set 0-9. The final four digits represent the “station” or “customer line” number. For example, with the phone number 573-751-5567, 573 is the area code, 751 is the central office code, and 5567 is the station number.

From a mathematician's point of view, each of the 10 digits in a phone number could be assigned one of the 10 possible values from the set (0, 1, 2,...9) producing in total 10 billion possible combinations of numbering arrangements. However, under the current North American Numbering Plan, the first three digits of the 10-digit combination are assigned specific values, ie, a specific area code. This limits the maximum possible combinations within that area code to 10 million potential numbering arrangements made up of 1000 possible combinations for the central office code. Associated with each central office code are 10,000 station numbers referred to as a “ten thousand block.”

Historically, each central office code (NXX) and its associated ten thousand block (XXXX) was assigned to a single company within a specific geographic area for call routing and rating purposes. This geographic area is called a rate center. Over the past decade, the FCC, state commissions, and the industry started replacing this allocation system with a number conservation method called “number pooling.” With number pooling, the ten thousand block is divided into 10 one-thousand size blocks for assignment, including assignment to different companies operating in the same geographic rate center.

The FCC adopted guidelines that established additional number conservation methods, including a requirement that telephone companies assign numbers to customers sequentially and that telephone companies meet certain utilization thresholds based on “months until exhaust” before receiving additional resources. The North American Numbering Plan Administrator and Pooling Administrator (Neustar) was charged with monitoring and assigning numbering resources in compliance with the guidelines. If Neustar denies a requested code assignment, the telephone company may request that the state commission review the denial and then direct Neustar to assign the requested resources.

Barbara A. Meisenheimer Experience With Numbering Resources

Ms. Meisenheimer has been a utility economist with the Office of the Public Counsel since 1995. As the Public Counsel's expert witness before the PSC, she has extensive experience analyzing area code relief and number conservation proposals and issues over the last 7 years. On behalf of the Missouri Public Counsel and in conjunction with other state consumer advocates, she helped draft numbering issues comments to the FCC. From 2000-2001, she served as a consumer representative on the North American Numbering Council, a committee of industry and governmental stakeholders appointed by the FCC to make recommendations on numbering issues. As a NANC member, she participated in the development of recommendations on number conservation measures, including many now codified in FCC rules.