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July 13, 2001

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison St., Suite 100
Jefferson City, Missouri 65101

FILED²
JUL 13 2001
Missouri Public
Service Commission

Re: **Case No. TO-2000-374**

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case are an original and eight copies of a Joint Motion to Modify Implementation Dates for 314 NPA and 816 NPA Relief Plans.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Anthony K. Conroy /tm

Anthony K. Conroy

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUL 13 2001

Missouri Public
Service Commission

In the Matter of the Petition of the North)
American Numbering Plan Administrator,)
on Behalf of the Missouri Telecommunications) Case No. TO-2000-374
Industry, for Approval of NPA Relief Plan for)
the 314 and 816 Area Codes.)

**JOINT MOTION TO MODIFY IMPLEMENTATION
DATES FOR 314 NPA AND 816 NPA RELIEF PLANS**

COME NOW Southwestern Bell Telephone Company (SWBT), Southwestern Bell Wireless, LLC, d/b/a Cingular Wireless, Verizon, Verizon Wireless, Sprint Missouri, Inc. d/b/a Sprint, AT&T, Lathrop Telephone Company, ALLTEL Missouri, Inc., Cass County Telephone Company, Spectra Communications Group, LLC, MCImetro Access Transmission Services, LLC (WorldCom) and the Staff of the Missouri Public Service Commission (Joint Movants), and for their Joint Motion to Modify Implementation Dates for 314 NPA and 816 NPA Relief Plans, state to the Missouri Public Service Commission (Commission) as follows:

1. On April 17, 2001, the Commission issued its Order Extending the 314 NPA and 816 NPA Relief Plan Implementation Dates in this case. In its Order, the Commission extended the implementation dates for the 314 NPA (557 overlay) as follows:

- Permissive dialing date: January 1, 2002
- Mandatory dialing date: May 5, 2002

The Commission also extended the implementation dates for the 816 NPA (975 overlay) as follows:

- Permissive dialing date: May 5, 2002
- Mandatory dialing date: September 8, 2002

147

The Commission also ordered that the technical implementation subcommittees for the 314 and 816 NPAs shall file reports no later than August 31, 2001, providing information necessary for the Commission to determine whether relief should be extended again for either of the NPAs. This joint motion is separate from the subcommittees' report.

2. The Joint Movants believe that there are several factors the Commission should consider in establishing dates for the implementation of the 314 and 816 overlay NPAs and similar network changes. In order to minimize potential disruptions to the network, and possible inconvenience to the public, changes in permissive and mandatory dialing patterns should be implemented on Saturday evenings at midnight. In addition, these types of changes should not occur on or near major holidays when call levels and calling patterns will be unusually high. Finally, the Commission and the industry members should work cooperatively to establish dates for implementing changes in permissive and mandatory dialing patterns to not occur on a day when another major network event, (e.g., installation of a new switch or implementation of other area codes around the country) is scheduled. Based on these types of factors, the Joint Movants believe that minor modifications to the implementation dates previously ordered by the Commission are necessary in order to ensure an orderly implementation of the 314 and 816 NPA Relief Plans.

3. With respect to the 314 NPA, Joint Movants propose that the permissive dialing date be changed from January 1, 2002 to January 12, 2002. It would be unnecessarily challenging to implement permissive dialing in the 314 NPA on New Years Day, a national holiday, when call volumes are unpredictable. To accommodate this situation, the Joint Movants would propose that the permissive dialing date for the 314 NPA be extended by 11 calendar days, to January 12, 2002.

4. Likewise, the date selected by the Commission as the mandatory dialing date for the 314 NPA, May 5, 2002, is one week before Mother's Day. The Joint Movants believe it would be problematic to implement mandatory dialing one week before one of the busiest calling days of the entire year. The Joint Movants propose that the mandatory dialing date for the 314 NPA be extended to May 18, 2002.

5. With respect to the 816 NPA, Joint Movants propose that the permissive dialing date be changed from May 5, 2002 to May 25, 2002. For the reasons described above, it would also be problematic to implement permissive dialing in the 816 NPA one week before Mother's Day. It would also be difficult to implement permissive dialing in the 816 NPA on the same date mandatory dialing in the 314 NPA is being implemented, as contemplated in the current schedule. Therefore, the Joint Movants propose that permissive dialing in the 816 NPA be implemented on May 25, 2002, which is one week after the date the Joint Movants have proposed herein for implementation of mandatory dialing in the 314 NPA.

6. Finally, Joint Movants propose that the mandatory dialing date for the 816 NPA be changed from Sunday, September 8, 2002, to Saturday, September 14, 2002. As described above, it is more difficult to implement a dialing pattern change on a Sunday. Therefore, the Joint Movants propose that the mandatory dialing date for the 816 NPA be changed to the following Saturday, September 14, 2002.

7. For the reasons described above, the Joint Movants propose the following modified implementation schedule:

314 NPA (557 overlay);

- Permissive dialing date: January 12, 2002
- Mandatory dialing date: May 18, 2002

816 NPA (975 overlay):

- Permissive dialing date: May 25, 2002
- Mandatory dialing date: September 14, 2002

This slightly modified implementation schedule would permit the 557 and 975 overlay NPAs to be implemented in a more efficient and orderly manner, and would not substantially delay implementation of the 557 and 975 overlay NPAs.

WHEREFORE, for the reasons described above, the Joint Movants respectfully request that the Commission modify the implementation dates for the 314 and 816 NPA relief plans as set forth in paragraph 7.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on July 13, 2001.

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