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

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

**SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SOUTHWESTERN BELL TELEPHONE COMPANY'S MOTION FOR EXTENSION OF TIME TO SUBMIT A PROPOSAL REGARDING RECOVERY OF CARRIER SPECIFIC COSTS RELATED TO THE MISSOURI STATE NUMBER POOLING TRIALS**

Comes now Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company ("SWBT") and, for its Motion for Extension of Time To Submit a Proposal Regarding Recovery of Carrier Specific Costs Related to the Missouri State Number Pooling Trials, states as follows:

1. On September 25, 2001, the Missouri Public Service Commission ("Commission") entered its Order Directing State Number Pooling. In that Order, the Commission directed the implementation of thousands block number pooling in the 314 and 816 NPAs. Specifically, the Commission ordered thousands block number pooling in the 314 NPA to be implemented with a mandatory start date of January 2, 2002, and thousands block number pooling in the 816 NPA to be implemented with a mandatory start date of February 1, 2002. Additionally, the Commission ordered the industry to file a proposal identifying and allocating the costs and savings of the industry resulting from the pooling trials and to provide a plan to fairly recover the net costs to the industry of the pooling trials, including any plan to recover the costs in existing charges.

2. On October 5, 2001, SWBT filed a Motion for Reconsideration, On Behalf of the Telecommunications Industry, Regarding the Implementation Dates for State Number Pooling

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Trials. Specifically, the industry requested that the Commission push back the number pooling trial for the 314 NPA until January 22, 2002, and the number pooling trial for the 816 NPA until February 22, 2002.

3. On October 25, 2001, the Commission entered its Order Regarding Implementation Dates for State Number Pooling Trials. In that Order, the Commission modified the mandatory start dates of the number pooling trials. Specifically, the Commission ordered thousands block number pooling in the 314 NPA to be implemented with a mandatory start date of January 22, 2002, and in the 816 NPA to be implemented with a mandatory start date of February 22, 2002.

4. On November 21, 2001, the Staff of the Missouri Public Service Commission ("Staff") filed its Motion to Establish Cost Allocation Method and to Set Deadline for Industry to File a Proposed Cost Recovery Plan. The Staff proposed that the cost allocation methodology for the Missouri pooling trials should be based upon pro rata allocation of cost to all telecommunications carriers providing service within the state in proportion to each carrier's interstate, intrastate, and international telecommunications revenues, irrespective of whether carriers may or may not be participating in the pooling trial. Additionally, the Staff proposed a deadline of March 22, 2002, as the deadline for the industry proposal for any plan to recover the net costs to the industry of the pooling trials.

5. On December 18, 2001, the Commission entered its Order Regarding Cost Allocation and Cost Recovery for State Number Pooling Trials. In that Order, the Commission ordered the Staff, NeuStar and the industry to allocate costs according to the local number portability ("LNP") model on a state specific basis with a pro rata allocation to all carriers in the state in proportion to each carrier's interstate, intrastate and international telecommunications

revenues irrespective of whether carriers are participating in the pooling trial. The Commission ordered joint costs, allocation and billing data to be reported to the Staff. Additionally, the Commission ordered the industry to submit a proposal for recovery of carrier specific costs, including joint costs allocated to a specific carrier, no later than March 22, 2002. Finally, the Commission ordered the Staff to submit its report and recommendation to the Commission regarding the industry proposal no later than April 22, 2002.

6. On January 10, 2002, in response to Staff's Motion to Extend Effective Date and for Reconsideration, the Commission entered its Second Order Regarding Cost Allocation and Cost Recovery for State Number Pooling Trials. In that Order, the Commission ordered the Staff, NeuStar and the industry to allocate costs according to the National LNP model with a pro rata allocation to all carriers in the state in proportion to each carrier's interstate, intrastate, and international telecommunications end-user revenues using data provided to the National Exchange Carriers Association irrespective of whether carriers are participating in the pooling trial. The Commission further ordered total joint costs incurred and allocated to the industry and apportionment of the costs to be reported to the Staff.

7. On February 27, 2002, the Staff filed its Status Report on State Number Pooling Trials, advising the Commission that the state number pooling trials were successfully implemented on the mandated start dates.

8. Although SWBT anticipated that it would be able to report its carrier specific costs, including joint costs that were allocated to it, by March 22, 2002, it is unable to do so at this time. Specifically, although the state number pooling trials were successfully implemented on the mandated start dates, there remains costs associated with the trial that have not yet been incurred.

9. The trial was implemented using NPAC Release 1.4, which stores data in carrier's Signaling Transfer Point ("STP") database one record at a time. For example, with NPAC Release 1.4, there is one record for each telephone number in the thousands number block. NPAC Release 3.1, which is be used for national thousands block number pooling, includes efficient data representation ("EDR"). EDR allows a Location Routing Number ("LRN") to be associated with a block of one thousand numbers as a single record. Because EDR allows one thousand numbers to be downloaded and stored in a service provider's database as a single record, instead of one thousand records, it is expected to significantly extend a carrier's STP capacity for thousands block number pooling. Although SWBT will recover the costs for implementing NPAC Release 3.1 using the national cost recovery methodology, SWBT will perform database activity associated with "cleaning up" database records that used NPAC Release 1.4 software functionality. SWBT will begin migrating its records from NPAC Release 1.4 to NPAC Release 3.1 in April, 2002, and SWBT anticipates that it will be completed by the end of May, 2002.

10. Additionally, SWBT has not received bills for payment from all the vendors, including NeuStar, associated with the administration costs for the trial. This is not unusual as there is typically some delay between the end of the thousands block number pooling trial and receipt of a bill for the administration costs associated with the trial. Once SWBT receives these bills, SWBT will be able to identify its carrier specific costs, including joint costs allocated to it.[1]

[1]Staff filed a pleading on March 20, 2002, which states: "On March 19, 2002, a representative of NeuStar, the national pooling administrator, issued the following message: `NeuStar Number Pooling Services is pleased to announce that all state number pooling trials were successfully migrated to the national Pooling Administration System (PAS) on schedule this past weekend. All state pooling trials are now part of the national number pooling system.'" PAS is the interfacing system for service providers to submit requests for blocks when new numbers are required in a pooling NPA. Thus, NeuStar's message is neither relevant to SWBT's need to migrate records from NPAC Release 1.4 to 3.1 nor SWBT's need to receive bills associated with administration of Missouri's thousands block pooling trials before SWBT can submit a proposal regarding its carrier specific costs, including joint costs allocated to it, related to the Missouri state number pooling trials.

11. SWBT further anticipates that it will be able to quantify all of the costs associated with the Missouri state number pooling trials, no later than June 28, 2002, and can file its proposal with the Commission at that time.

Wherefore Southwestern Bell Telephone Company respectfully requests the Commission to grant its Motion for Extension of Time To Submit a Proposal Regarding Recovery of Carrier Specific Costs Related to the Missouri State Number Pooling Trials, extending the date for filing a proposal for recovery of carrier specific costs, including joint costs allocated to it, to June 28, 2002, together with any further and additional relief the Commission deems just and proper.

Respectfully submitted,

BY _____

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## CERTIFICATE OF SERVICE

Copies of this document were served on the following parties via hand-delivery or by first-class, postage prepaid, U.S. Mail on March 22, 2002.

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