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October 5, 2001

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

**FILED<sup>3</sup>**

**OCT 05 2001**

**Missouri Public  
Service Commission**

Re: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight copies of Southwestern Bell Telephone Company's Motion for Reconsideration, on Behalf of the Telecommunications Industry, Regarding the Implementation Dates for State Number Pooling Trials.

Very truly yours,

*Mimi B. MacDonald tm*

Mimi MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
OCT 05 2001

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. )

Missouri Public  
Service Commission

**SOUTHWESTERN BELL TELEPHONE COMPANY'S**  
**MOTION FOR RECONSIDERATION, ON BEHALF OF THE**  
**TELECOMMUNICATIONS INDUSTRY, REGARDING THE IMPLEMENTATION**  
**DATES FOR STATE NUMBER POOLING TRIALS**

Comes now, Southwestern Bell Telephone Company ("SWBT") and, for its Motion for Reconsideration, On Behalf of the Telecommunications Industry<sup>1</sup>, Regarding the Implementation Dates for State Number Pooling Trials, states as follows:

1. On September 25, 2001, the Missouri Public Service Commission ("the Commission") entered its Order Directing State Number Pooling Trials. In that Order, the Commission ordered thousands-block number pooling: (a) in the 314 NPA to be implemented with a mandated start date of January 2, 2002; and (b) in the 816 NPA to be implemented with a mandated start date of February 1, 2002.
2. The industry requests 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. There are a number of reasons for this request. Several of the parties are involved in a state number pooling trial in the 713 NPA in Houston, Texas on January 1, 2002. For these companies, the same group of employees must begin number pooling in the 713 NPA and 314

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<sup>1</sup> For this motion, the industry consists of Allegiance Telecom, AT&T, NuVox, Southwestern Bell Telephone Company, Spectra, Sprint, WorldCom, and XO Communications.

NPA on the same date. It would, therefore, be beneficial to the industry to stagger the commencement of pooling trials.

4. The FCC recognized that a staggered rollout is necessary in its Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, March 31, 2000, paragraph 159. The FCC stated, in pertinent part: "a staggered rollout schedule is necessary, primarily because an overload of the telecommunications network may cause network disruptions when carriers' Service Control Points (SCPs) capacity has been depleted." The FCC, thereafter, determined that the national rollout should encompass a maximum of three NPAs in each NPAC region per quarter; in other words, one NPA per month per NPAC region.

5. Other parties simply request additional time to implement number pooling trials in the 314 and 816 NPAs because this is the first pooling trial in which they will have participated.

6. The industry is aware of no harm that would result from granting the request; number pooling will still occur in the 314 and 816 NPAs prior to the national rollout.

7. Because the industry must begin its preparations to implement number pooling, the industry requests an expedited decision from the Commission.

WHEREFORE, Southwestern Bell Telephone Company, on Behalf of the Telecommunications Industry, requests this Commission grant its Motion for Reconsideration Regarding the Implementation Dates for State Number Pooling Trials, together with any additional and further relief the Commission deems just and proper.

Respectfully submitted,

BY Mimi B. MacDonald /tm

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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 October 5, 2001.

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