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## Missouri Public Service Commission

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December 20, 2001

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Mr. Dale Hardy Roberts  
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Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

FILED<sup>3</sup>

DEC 20 2001

RE: Case No. TO-2000-374

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION TO EXTEND EFFECTIVE DATE AND FOR RECONSIDERATION**.

This filing has been mailed or hand-delivered this date to all counsel of record, and to the Co-chairs and attorney for the North American Portability Management LLC.

Thank you for your attention to this matter.

Sincerely yours,

William K. Haas  
Deputy General Counsel  
(573) 751-7510  
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WKH:sw  
Enclosure  
cc: Counsel of Record

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

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

DEC 20 2001

Missouri Public  
Service Commission

In the Matter of the North American )  
Numbering Plan Administrator's Petition )  
for Approval of NPA Relief Plan for the )  
314 and 816 Area Codes. )

Case No. TO-2000-374

**STAFF'S MOTION TO EXTEND EFFECTIVE DATE AND FOR RECONSIDERATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), pursuant to Commission Rules 4 CSR 240-2.050 and 4 CSR 240-2.160, and for its motion states:

1. On November 21, 2001, the Staff filed a motion in which it proposed, *inter alia*, a cost allocation methodology for the state thousands-block number pooling trials.
2. On December 3, 2001, Nextel West Corp., a wireless carrier, filed its response to the Staff's motion.
3. On December 13, 2001, the Staff filed its reply to Nextel's response.
4. On December 18, 2001, the Commission issued its Order Regarding Cost Allocation And Cost Recovery For State Number Pooling Trials which ordered "[t]hat Staff, NeuStar and the industry shall allocate costs according to the 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. Joint costs, allocation and billing data shall be reported to the Commission staff." The Order bears an effective date of December 28, 2001.
5. The Staff requests the Commission to reconsider that part of its Order adopting the LNP model "on a state specific basis" and requiring carriers to provide data to the Staff. In

185

its December 13 reply, the Staff explained its intention that shared pooling costs should be allocated based upon the National LNP model, which is based on end-user revenue already routinely provided to the National Exchange Carriers Association (NECA). Specifying a "state specific basis" in the Order will require hundreds of carriers, the great majority of which are not parties to this case, to calculate and report their Missouri specific interstate, intrastate and international telecommunications revenues. Further, ordering the carriers to submit joint costs, allocation and billing data to Staff will require extensive review and calculations on the part of Staff to determine each carrier's appropriate allocation, all by the January 22, 2002 implementation date for the first pooling trial. Relying on Staff's recommendation in its December 13 reply (using the National LNP model which is based on end-user revenue already routinely provided to NECA) will allow Neustar to have the information it needs readily available and in a timely manner.

6. Due to the intervening holidays and to allow other parties the opportunity to respond and to allow the Commission the opportunity to review the substance of this motion, the Staff requests the Commission extend the effective date of the December 18 Order to January 9, 2002.

WHEREFORE, the Staff requests the Commission to extend the effective date of its December 18 Order, to reconsider its December 18 Order, and to adopt the National LNP model.

Respectfully submitted,

DANA K. JOYCE  
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Wm K Haas

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 20<sup>th</sup> day of December 2001.

Wm K Haas

**Service List for**  
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**Revised: December 20, 2001 (SW)**

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