



Commissioners
KELVIN L. SIMMONS
Chair
CONNIE MURRAY
SHEILA LUMPE
STEVE GAW

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

November 21, 2001

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLILIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³

NOV 21 2001

RE: Case No. TO-2000-374

Dear Mr. Roberts:

**Missouri Public
Service Commission**

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION TO ESTABLISH COST ALLOCATION METHOD AND TO SET DEADLINE FOR INDUSTRY TO FILE A PROPOSED COST RECOVERY PLAN.**

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
(573) 751-9285 (Fax)

WKH:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
NOV 21 2001

Missouri Public
Service Commission

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

**STAFF'S MOTION TO ESTABLISH COST ALLOCATION METHOD AND TO
SET DEADLINE FOR INDUSTRY TO FILE A PROPOSED COST RECOVERY PLAN**

COMES NOW the Staff of the Missouri Public Service Commission and for its motion
states:

1. On September 25, 2001, the Commission issued an Order Directing State Number
Pooling Trials that granted the Staff's motion to implement state thousands-block number
pooling trials in the 314 and 816 Numbering Plan Areas (NPAs).¹ Ordered Paragraph 1.H.
directs:

The industry shall file a proposal identifying and allocating the costs and
savings of the industry resulting from the pooling trials and provide a plan to
fairly recovery the net costs to the industry of the pooling trials, including any
plan to recover the costs in existing charges.

¹ On October 25, 2001, the Commission issued an Order that rescheduled the timelines
for implementing the pooling trials. The Commission mandated start dates of January 22, 2002,
and February 22, 2002, for thousands-block number pooling in the 314 NPA and 816 NPA,
respectively.

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2. NeuStar, the state pooling trial administrator, has informed the Staff that it will need to know the allocation method, i.e., how to bill carriers for its costs, before the first pooling trial starts on January 22, 2002.

3. Cost allocation refers to the division of shared pooling costs among carriers. The individual carrier's allocation becomes part of that carrier's specific cost. The Federal Communications Commission (FCC) has determined that once national pooling is in place, the costs of pooling will be allocated to all telecommunications carriers in proportion to each carrier's interstate, intrastate, and international telecommunications end-user revenues.² However, because the Missouri Commission is planning to implement interim thousands-block number pooling before rollout of national pooling, the Missouri Commission is required to implement an interim cost allocation mechanism that will distribute the costs of number pooling in a competitively neutral manner.³ The FCC stated its belief "that even those carriers that cannot participate in thousands-block number pooling at this time will benefit from the more efficient use of numbering resources that pooling will facilitate."⁴ Consistent with the FCC's proposal for cost allocation for national pooling, the Staff proposes 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 participating in the pooling trial.

² *Report and Order and Further Notice of Proposed Rulemaking in the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, 15 FCC Rcd 7574, ¶ 207 (2000).

³ *In the Matter of Numbering Resources Optimization*, CC Docket Nos. 99-200, 96-98, NSD File No. L-99-90, ¶ 22.

⁴ *Id.*

4. Cost recovery refers to the ability of individual carriers to recover their carrier-specific costs for implementing pooling. The Staff proposes a deadline of March 22, 2002, which is thirty (30) days after the mandated start date for thousands-block number pooling in the 816 NPA, as the deadline for the industry proposal, as previously directed by the Commission in its September 25, 2001 Order, for any plan to recover the net costs to the industry of the pooling trials.

Respectfully submitted,

DANA K. JOYCE
General Counsel

Wm K Haas

William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
e-mail: whaas01@mail.state.mo.us

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 21st day of November, 2001.

Wm K Haas

**Service List for
Case No. TO-2000-374
Revised: November 21, 2001 (SW)**

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

James F. Mauze/Thomas E. Pulliam
Ottson, Mauze, Leggat & Belz, L.C.
Midvale Building
112 South Hanley
St. Louis, MO 63105-3418

James M. Fischer/Larry W. Dority
Attorney at Law
101 West McCarty Street, Suite 215
Jefferson City, MO 65101

Doug Galloway
Sprint Missouri, Inc.
319 Madison Street
P.O. Box 1024
Jefferson City, MO 65102

Paul S. DeFord
Lathrop & Gage
2345 Grand Boulevard, Suite 2800
Kansas City, MO 64108

Peter Mirakian, III/Wendy E. DeBoer
Spencer, Fane, Britt & Browne, LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106

Cheryl Tritt/Lee Adams
Morrison & Foerster, LLP
2000 Pennsylvania Ave., NW Ste. 5500
Washington, D.C. 20006

Craig S. Johnson
Andereck, Evans, Milne, Peace & Baumhoer
301 E. McCarty Street
P.O. Box 1438
Jefferson City, MO 65102

Paul G. Lane/Leo J. Bub/
Anthony Conroy/Mimi B. MacDonald
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101-1976

Lisa Creighton Hendricks
Sprint Missouri, Inc.
Mail Stop KSOPKJ0502
5454 W. 110th Street
Overland Park, KS 66211

Kevin K. Zarling
AT&T Communications
919 Congress, Suite 900
Austin, TX 78701

Carl J. Lumley/Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule
130 S. Bemiston, Suite 200
Clayton, MO 63105

Edward J. Cadieux/Carol Keith
Gabriel Communications, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63006

Mark W. Comley
Newman, Comley & Ruth, P.C.
601 Monroe Street, Suite 301
Jefferson City, MO 65101

W. R. England, III
Brydon, Swearngen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456

Kenneth L. Judd
Southwestern Bell Wireless Inc.
13075 Manchester Road, 100N
St. Louis, MO 63131

James Rohfling
Brasil & Rohfling
6390 Lindell Blvd.
St. Louis, MO 63108

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, NJ 07090

Michael O'Connor
NAPM LLC Co-chair
Verizon
1095 Avenue of the Americas, Floor 34
New York, NY 10013

Pamela H. Connell
NAPM LLC Co-chair
AT&T
Promenade I, Room 15E54
1200 Peachtree Street
Atlanta, GA 30309-3579

Don Sciullo
Attorney for NAPM LLC
Berenbaum, Weinshienk, and Eason
370 17th Street, Suite 2600
Denver, CO 80202

Kimberly Wheeler
NeuStar
1120 Vermont Ave., N.W.
Washington, DC 20005