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## Missouri Public Service Commission

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July 30, 2001

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Missouri Public Service Commission  
P. O. Box 360  
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FILED<sup>3</sup>

JUL 30 2001

Missouri Public  
Service Commission

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

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO OFFICE OF THE PUBLIC COUNSEL'S MOTION TO FURTHER POSTPONE IMPLEMENTATION DATES FOR 314 AND 816 NPA RELIEF PLANS.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Wm K Haas*

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>

JUL 30 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 FOR EXTENSION OF TIME TO RESPOND TO**  
**OFFICE OF THE PUBLIC COUNSEL'S MOTION TO FURTHER**  
**POSTPONE IMPLEMENTATION DATES FOR 314 AND 816 NPA RELIEF PLANS**

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

1. On July 23, 2001, the Office of the Public Counsel filed a motion asking the Missouri Public Service Commission to revise the 314 and 816 Number Plan Area (NPA) relief plans implementation schedule.

2. Commission Rule 4 CSR 240-2.080(16) provides that parties shall be allowed not more than ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered. Accordingly, responses to Public Counsel's motion are due no later than August 2, 2001. Commission Rule 4 CSR 240-2.050(3)(A) provides that when an act is required or allowed to be done by rule of the Commission at or within a specified time, the Commission, at its discretion, may order the period enlarged before the expiration of the period originally prescribed.

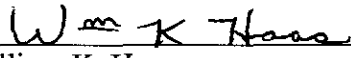
3. On October 24, 2000, the Commission issued a Report and Order that adopted an all services distributed overlay as the method of relief for both the 314 and 816 NPAs. The Commission approved implementation plan schedules for the 314 NPA on December 26, 2000, and for the 816 NPA on February 15, 2001. On April 17, 2001, the Commission issued an Order extending the 314 and 816 NPA relief plan implementation dates. That Order further provided that the technical implementation subcommittees for the 314 and 816 NPA shall file reports no later than August 31, 2001, providing information to determine whether relief may be extended again for either of the NPAs and suggesting proposed extension dates, if any. On July 13, 2001, several parties filed a joint motion asking the Commission to make minor modifications to the relief implementation dates, for example, to avoid holidays. The motion stated that it was separate from the subcommittees' report due no later than August 31, 2001.

4. Because the Staff and technical committees were working toward an August 31 deadline for suggesting proposed extension dates, if any, the Staff has not yet developed its recommendation on extending the relief implementation plans for the 314 and 816 NPAs. Extending the deadline to August 31 for parties to respond to Public Counsel's motion will not cause harm to the relief implementation process because that is the deadline previously established for the technical committees to make their recommendations on whether the relief plan implementation schedules may be extended again.

WHEREFORE, the Staff requests that the Commission extend to August 31, 2001, the deadline for responses to Public Counsel's motion.

Respectfully submitted,


DANA K. JOYCE  
General Counsel

  
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Missouri Bar No. 28701

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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 30<sup>th</sup> day of July, 2001.

  
\_\_\_\_\_

**Service List for**  
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**Revised: July 30, 2001 (SW)**

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