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July 26, 2000

FILED³

JUL 27 2000

VIA AIRBORNE EXPRESS

Dale Hardy Roberts, Secretary
Missouri Public Service Commission
301 West High Street
5th Floor, Room 530
Jefferson City, MO 65101

Missouri Public
Service Commission

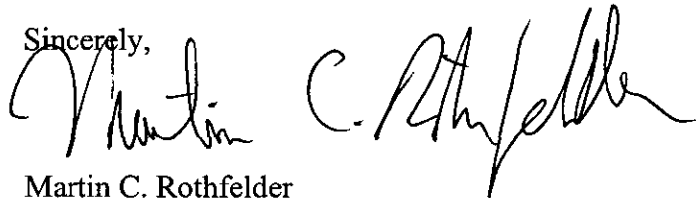
**Re: In the Matter of the Petition of the North
American Numbering Plan
Administrator, on Behalf of the Missouri
Telecommunications Industry, for
Approval of NPA Relief Plan for the 314
and 816 Area Code - Case No. TO-2000-
374**

Dear Executive Secretary:

On behalf of Nextel West, Inc. enclosed is an Application to Intervene and fifteen (15) copies.

Please file the original and fifteen (15) copies and return the extra copy to us in the enclosed self-address stamped enveloped marked "filed".

Sincerely,



Martin C. Rothfelder

MCR/rmc
Enclosures

FILED³

JUL 27 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

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 Code)

APPLICATION OF NEXTEL TO INTERVENE

Nextel West, Inc. (Nextel), pursuant to Section 386.420 RSMo and 4 CSR 240-2.110, respectfully seeks an Order granting it intervention into the above referenced proceeding. In support thereof, Nextel states as follows:

1. Nextel and its parent corporation, Nextel Communications, Inc., are Delaware corporations with their principal business office located at 1505 Farm Credit Drive, McLean, Va 22102. Nextel maintains offices in Missouri at: One CityPlace Drive, Suite 100, St. Louis, MO 63141.

2. All correspondence, communications and orders in this docket should be directed to:

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, NJ 07090
Phone no. (908) 301-1211
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3. Nextel provides wireless telecommunications services in the St. Louis Metropolitan area, in other parts of Missouri and in other states. These services are classified as

Commercial Mobile Radio Service under federal law.¹ Nextel provides CMRS services pursuant to Specialized Mobile Radio (SMR) licenses issued by the Federal Communications Commission (FCC) pursuant to 47 C.F.R. Part 90.

4. Nextel provides enhanced SMR service in Missouri which employs digital technology to offer users a menu of services in a single handset: mobile telephone, alphanumeric messaging, and "Direct Connect" dispatch type services². These digital SMR services, also referred to either as wide-area SMR or Enhanced Specialized Mobile Radio (ESMR), are provided using a multiple low-power, low-tower configuration, which employs a Motorola-developed digital technology, iDEN. Nextel's ESMR systems are constructed by reconfiguring the traditional analog single-site SMR systems into multiple-site systems which can employ channel re-use, similar to a cellular system, and thereby provide services on a wide-area basis.

5. Nextel needs access to telephone numbers in a manner consistent with the national numbering system or other designs that are generally consistent with its network. As a general matter, wireless carriers, due to their technology, have different needs for numbers than landline carriers. The technology and numbering needs of wireless carriers is also not uniform. Nextel's unique technology may result in somewhat different numbering needs than wireless carriers licensed as cellular or personal communications services carriers. Nextel holds NXXs (Central Office Codes) in Missouri NPAs (area codes).

6. The notices in this docket dated January 19, 2000, February 3, 2000 and April 13, 2000 indicates that this docket involves the December 17, 1999 petition on the North American Numbering Plan Administrator (NANPA) for area code relief. Area Code relief constitutes

¹ Commercial Mobile Radio Service (CMRS) is defined at 47 C.F.R. §20.3. *See also*: 47 U.S.C. § 153.

² Direct Connect allows the subscriber to use the handset as a two-way portable radio.

specific activities that the FCC has allowed state public utility commission to undertake pursuant to 47 U.S.C. § 251(e)(1). 47 C.F.R. § § 52.7(b), 52.19. Consideration of area code relief is a separate action from considering implementation of number conservation techniques.

7. On July 20, 2000, the FCC issued an order authorizing this Commission to engage in certain number conservation techniques. Via order dated July 21, 2000 in this docket, this Commission indicated it would consider the matters authorized in that FCC order in this docket.

8. Due to the new authority to engage in number conservation techniques from an order dated July 20, 2000 and the lack of prior notice regarding consideration of such number conservation techniques in this docket, Nextel intervention should not be denied because it is after the intervention deadline previously set in this docket.

9. Nextel actively participated in this Commissions prior numbering docket, Docket No. TO-99-14.

10. Nextel, as a general matter, supports efforts to conserve numbers that are consistent with the national numbering system, the jurisdiction of the various governmental agencies and the technological and business needs of carriers. Nextel is an active member of the North American Numbering Council (NANC). Nextel is also active in numbering resource conservation dockets before various state public utility commissions including the state utility commissions in Massachusetts, Connecticut, Pennsylvania, Illinois, New York, Texas, Maine and New Hampshire.

11. Due to Nextel's unique service and technology, no other party represents Nextel's interests in this docket. Because of Nextel's unique service and technology, various potential action under the issues identified as in this docket will impact the ability of Nextel to provide service to Missouri customers. Thus, allowing Nextel the status of an intervenor is in the interest of a just resolution of this matter and is in the public interest.

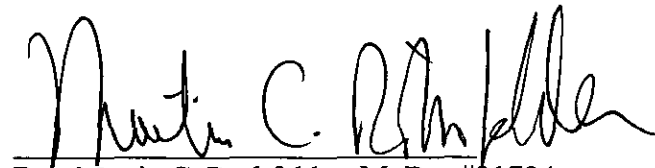
12. In addition, Nextel's experience in the telecommunications industry and specifically in numbering issues at both the state and federal level will aid the Commission in examining these issues. Therefore, it is in the public interest to allow Nextel to intervene and fully participate herein.

WHEREFORE, Nextel respectfully requests the Commission to issue an Order granting this Application to Intervene of Nextel.

Respectfully submitted,

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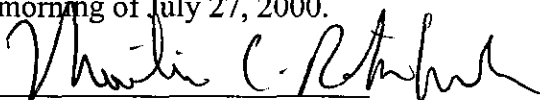
Attorneys for
NEXTEL WEST, INC.

A handwritten signature in black ink, appearing to read "Martin C. Rothfelder", is written over a horizontal line.

By: Martin C. Rothfelder, MoBar #31794

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by Airborne Express Overnight on July 26, 2000 for delivery on the morning of July 27, 2000.


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