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

SEP 18 2000

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 West High Street, Suite 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 Codes  
Case No. TO-2000-374

Dear Mr. Roberts:

Enclosed for filing are an original and nine (9) copies of a Brief of Sprint  
Communications Company L.P., Sprint Missouri, Inc., and Sprint Spectrum L.P. d/b/a  
Sprint PCS.

If you have any questions, please do not hesitate to contact me at (913) 345-  
7915.

Sincerely,

  
Linda K. Gardner

LKG:ket  
Enclosures

cc: All Parties

**BEFORE THE 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

**BRIEF OF  
SPRINT MISSOURI, INC., SPRINT SPECTRUM L.P. d/b/a SPRINT PCS  
AND SPRINT COMMUNICATIONS COMPANY L.P.**

This case addresses two distinct issues. One issue involves number conservation efforts and the other involves recommended area code relief plans. The industry consensus recommendation for area code relief plan implementation is for an all-services distributed overlay of the 816 NPA and a retroactive overlay for the 314 NPA. Alternatively, an all-services overlay could be implemented in the 314 area. Sprint supports either overlay alternative for the 314 NPA.

OPC does not offer a concrete recommendation on the appropriate NPA relief for the 816 NPA. Instead, OPC suggests that the Commission should wait with any decision for the 816 NPA until assignable codes fall below 100. OPC further suggests that either a geographic split or an overlay may be appropriate NPA relief alternatives.

OPC is alone in its support of a geographic split. Sprint and the other parties support an all-services overlay for the 816 NPA rather than a geographic split. As SWBT witness Bell correctly notes: "[a]ny reasonable geographic split line will split the local calling scope in the Kansas City area which will create a confusing mix of 7 and 10 digit dialing for local calls."<sup>1</sup>

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<sup>1</sup> Exhibit 16, p. 7.

OPC is also alone in its suggestion that the Commission delay a relief plan until assignable codes fall below 100. Such a delay is ill-advised. Carriers are limited to a six-month inventory of numbers.<sup>2</sup> As Sprint witness Knox states:

An NPA relief plan needs to be longer than a carrier's six-month inventory period in order for carriers to have numbering resources when the NPA exhausts. Consumers would be hurt in selecting a carrier without numbering resources when a relief back-up plan is not long enough to provide numbering resources to all providers equally. Relief plans must be properly structured, a minimum of 12 months, and implemented so that exhaust does not occur and impact consumer choices.<sup>3</sup>

OPC's suggested delay will likely result in these very concerns materializing. Sprint urges the Commission to adopt an overlay for the 816 NPA in this case. As the FCC states: "[c]arriers should never be in the position of being unable to provide service to prospective customers because that carrier does not have access to numbering resources."<sup>4</sup>

## **NUMBER CONSERVATION**

Sprint supports number conservation efforts, such as sequential numbering assignment consistent with FCC requirements<sup>5</sup>, reclamation of unused and reserved NXXs consistent with the current central office code assignment guidelines<sup>6</sup>, and thousand block number pooling consistent with national number pooling standards and under the federal cost recovery umbrella.<sup>7</sup>

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<sup>2</sup> *In the Matter of Numbering Resource Optimization*, FCC 00-104, Report and Order and Further notice of Proposed Rulemaking, released March 31, 2000, at ¶ 189.

<sup>3</sup> Exhibit 7, p. 1.

<sup>4</sup> Exhibit 26, ¶ 17.

<sup>5</sup> Exhibit 6, p. 3-4.

<sup>6</sup> *Id.*, p. 4.

<sup>7</sup> *Id.*, p. 2-3.

Although the Commission received authority to implement a thousand block number pooling<sup>8</sup> trial in the 314 NPA, it should not do so. In fact, no party to this case, including OPC,<sup>9</sup> suggests that the Commission immediately implement a number pooling trial in the 314 NPA. The reason is simple: the cost outweighs the benefit, particularly this close to national number pooling implementation.<sup>10</sup>

To implement a state specific pooling trial the Commission will need to select a neutral third-party pooling administrator via the competitive bidding process.<sup>11</sup> In addition, parameters for the trial must be determined and technical issues resolved consistent with federal standards. The cost must be determined and a state-specific cost recovery mechanism must be implemented.<sup>12</sup> None of which has been begun in Missouri.

Conversely, work on the national level to implement thousand block number pooling is well underway.<sup>13</sup> The national thousand block number pooling rollout will occur nine months after the selection of a pooling administrator.<sup>14</sup> Any interim action by a state will be superseded by the national pooling framework anyway.<sup>15</sup> There is simply no benefit to proceeding with a state pooling trial at this time.

Instead, the Commission should concentrate its conservation efforts on the ordering of sequential numbering assignments in preparation of thousand block number

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<sup>8</sup> Thousand block number pooling involves the allocation of blocks of one thousand sequential telephone numbers within the same NXX code to different service providers. (Ex. 26, ¶ 13)

<sup>9</sup> Transcript (T.) at 169.

<sup>10</sup> See e.g. Transcript pages 348-349.

<sup>11</sup> T. at 170.

<sup>12</sup> Id., ¶ 21.

<sup>13</sup> T. at 367-368.

<sup>14</sup> Exhibit 26, ¶ 14.

<sup>15</sup> Id., ¶ 16.

pooling.<sup>16</sup> The Commission should also concentrate efforts on reclamation of unused and reserved NXXs.<sup>17</sup> Furthermore, during rationing, the Commission should hear and address claims from carriers seeking numbering resources outside of the rationing process.<sup>18</sup> Finally, opportunities for rate center consolidation should be pursued to the extent rate centers contain identical calling scopes and rates. These conservation efforts will better serve the Commission, carriers and consumers, rather than expending resources on the implementation of a number pooling trial in advance of the national roll-out.

Respectfully Submitted,

Sprint Missouri, Inc.  
Sprint Communications Company L.P.  
Sprint Spectrum L.P. d/b/a Sprint PCS

  
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#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing brief was mailed or hand-delivered to all counsel of record this \_\_\_\_ day of September, 2000.

  
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<sup>16</sup> Exhibit 6, p. 4.

<sup>17</sup> Id.

<sup>18</sup> Id.