

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION  
JEFFERSON CITY  
September 25 , 2001**

**CASE NO: TO-2000-374**

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Enclosed find certified copy of a ORDER in the above-numbered case(s).

Sincerely,

A handwritten signature in black ink that reads "Dale Hardy Roberts". The signature is written in a cursive, slightly slanted style.

**Dale Hardy Roberts**  
Secretary/Chief Regulatory Law Judge

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a Session of the Public Service  
Commission held at its office in  
Jefferson City on the 25th day of  
September, 2001.

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**  
)  
)

**ORDER DIRECTING STATE NUMBER POOLING TRIALS**

**Summary:**

This order directs the implementation of 1,000s block number pooling in the state of Missouri.

**State Number Pooling Trials in the 314 and 816 NPAs:**

On August 24, 2001, Staff moved the Commission to implement 1,000s block number pooling in the 314 NPA effective January 2, 2002, and in the 816 NPA effective February 1, 2002. Staff's motion suggests that the implementation time frame for national number pooling continues to be uncertain. State number pooling trials may be an effective bridge to preserve numbering resources and delaying the exhaust of NXX codes in the 314 and 816 NPAs and further postpone the burden of implementing the overlay relief plans previously approved by the Commission in this case.<sup>1</sup>

Staff proposes eight requirements for the Commission for implementing state number pooling trials. These requirements define the code holders subject to number

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<sup>1</sup> Based upon data from state pooling trials, 1,000s block number pooling can reduce demand for NXX codes by more than 50%. *NANPA Numbering News*, May/June 2001.

pooling, present an implementation structure and ensure compliance with appropriate guidelines. Staff's proposal defers immediate action to adopt a state cost recovery plan by suggesting that the Commission direct the industry to propose a cost recovery plan.

Public Counsel expressed support of state number pooling trials in a motion filed on July 23, 2001, and "fully concurred" in Staff's recommendation in its Suggestions in Support filed on August 31, 2001.

*Southwestern Bell Telephone Company (Bell) and Sprint Missouri, Inc. d/b/a Sprint (Sprint)* filed responses opposing Staff's request for number pooling trials on September 4 and 5, respectively. Bell asserted that with current code usage rates in the 314 and 816 NPAs that the national rollout of number pooling would occur in time to conserve numbering resources in these NPAs prior to exhaust. Bell argued that a state specific cost recovery plan under a state trial would unduly burden Missouri consumers and suggested that new cost saving software would be available for the national rollout of number pooling. Sprint concurred in Bell's position.

On September 14, 2001, Staff filed a reply to the responses from Bell and Sprint and provided additional information about the costs of implementing a state number pooling trial in Missouri. Staff's reply shows that the costs to the industry for contracting the services of the national pooling administrator, NeuStar, to administer pooling trials in Missouri would be de minimus.

Staff asserts on the basis of information obtained from NueStar that cost recovery by the industry will be on a regional basis, including the costs of converting software for the national pooling program and that Missouri will bear its share of these costs even if Missouri does not implement a pooling trial. Staff further states that many

presumed costs associated with pooling are presently being recovered through local number portability recovery mechanisms.

Finally, Staff asserts that state pooling trials will not unnecessarily burden the Commission, Staff or the industry because the state pooling program will mirror the national pooling program. Staff says that state pooling trials implemented prior to March 2002 will be converted to national pooling immediately prior to the national roll-out.

Staff presented information showing that the FCC rollout of national pooling continues to lag initial projections. This presents a possibility in that the 314 NPA or the 816 NPA could exhaust prior to implementation of number pooling on a national basis.

On September 21, 2001, GTE Midwest Incorporated, d/b/a Verizon Midwest (Verizon) filed a reply to Staff's September 14 reply. Verizon stated that certain software costs and costs of identifying number blocks in a state trial would not be recoverable in the national rollout. Verizon offered suggestions for a state cost recovery plan. Verizon stated that it could accept the deployment dates for a state pooling trial but questioned whether the costs would be justified in light of the imminent national rollout of 1,000s block numbering.

On September 24, 2001, Bell and Sprint filed a joint response to Staff's September 14 reply. These parties assert that because exhaust dates for the 314 and 816 NPAs are no longer imminent that ample time exists for the national rollout to occur such that the costs of a state pooling trial would be unnecessary and unwarranted.<sup>2</sup> Sprint and Bell argue that the 314 NPA is a prime candidate for early placement in the

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<sup>2</sup> Exhaust dates for both the 314 and 816 NPA are presently projected as 1Q2004 by NeuStar.

national rollout and that even under a worst case scenario where this NPA was the last selected in the region that national number pooling would occur in 2003 a year before the projected exhaust date. Sprint and Bell assert that carriers presently are preserving the integrity of 1,000s blocks assigned to them so that these blocks will be available for the national rollout.

Sprint and Bell also assert that there would be significant industry costs for a state trial. However, they do not quantify the costs. They also note that they face pooling trials and demands of meeting the national rollout in other states.

The Commission finds that state pooling trials as recommended by Staff can be implemented in Missouri with minimal costs to the industry and that few, if any, of these costs will be duplicated in a national rollout of number pooling. Whether or not Missouri implements number pooling trials, the industry and consumers will still bear costs on a regional basis to implement national number pooling. By implementing state pooling trials, Missouri can extend the lives of the 314 NPA and 816 NPA and delay considerable expenses and burdens to both consumers and the industry of implementing the overlay relief plans.

**IT IS THEREFORE ORDERED:**

1. That Staff's motion to implement state 1,000s block number pooling trials in the 314 and 816 NPA's is granted. The following conditions shall apply:

A) All Local Number Portability (LNP) capable code holders in the 314 NPA shall participate in a mandatory 1000s block pooling trial.

B) All LNP capable code holders in the 816 NPA shall participate in a mandatory 1000s block pooling trial.

- C) The industry, as represented by the North American Portability Management, LLC, shall contract with NeuStar for pooling administration services for the two pooling trials.
- D) All code holders in the 314 and 816 NPA shall attend or make arrangements to be represented or participate in an implementation meeting to be held by NeuStar, as the Pooling Administrator, no later than October 5, 2001.
- E) 1,000s block number pooling in the 314 NPA shall be implemented according to the timelines developed at the implementation meeting with a mandated start day of January 2, 2002.
- F) 1,000s block number pooling in the 816 NPA shall be implemented according to the timelines developed at the implementation meeting with a mandated start day of February 1, 2002.
- G) Pooling in the 314 and 816 NPAs will be conducted according to the Industry Numbering Committee's 1000s block pooling guidelines, as adopted and hereafter modified by the FCC.
- H) 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 recover the net costs to the industry of the pooling trials, including any plan to recover the costs in existing charges.
- I) The Staff shall file periodic reports advising the Commission of the status of the 1,000s block number pooling trials, when the trials are

fully implemented and when the trials are ended and moved into to the national number pooling program.

2. That this order shall become effective on October 5, 2001.

**BY THE COMMISSION**

A handwritten signature in black ink, reading "Dale Hardy Roberts". The signature is written in a cursive, flowing style.

**Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge**

( S E A L )

Simmons, Ch., Lumpe and Gaw, CC., concur  
Murray, C., dissents

Thornburg, Regulatory Law Judge



ALJ/Secretary:

*Wimbura / Bruce*

Date Circulated

*9-20*

CASE NO.

*10-2000-374*

Simmons, Chair

*KS*

Murray, Commissioner

*AM*

Lumpke, Commissioner

*48 p. 1, 2*

Gaw, Commissioner

*7/16 @ 1st meeting*

Commissioner

Agenda Date

*9-25*

*(meeting)*

Action taken:

*3-1 AA*

Must Vote Not Later Than

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and  
I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City,  
Missouri, this 25<sup>th</sup> day of Sept. 2001.

*Dale Hardy Roberts*

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge



