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December 26, 2000

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

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 816 NPA TECHNICAL AND PLANNING COMMITTEE'S RATE CENTER CONSOLIDATION REPORT**.

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,

William 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

FILED²

DEC 26 2000

Missouri Public
Service Commission

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 Codes.)

THE 816 NPA TECHNICAL AND PLANNING COMMITTEE'S
RATE CENTER CONSOLIDATION REPORT

Comes now Southwestern Bell Telephone Company and, on behalf of the 816 NPA
Technical and Planning Committee, files the 816 NPA Technical and Planning Committee's
Rate Center Consolidation Report, which is attached hereto.

Respectfully submitted,

Wm K Haaa for
BY Mimi B MacDonald
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816 NPA Technical and Planning Committee
Rate Center Consolidation Report
Case No. TO-2000-374
December 26, 2000

On October 24, 2000, the Missouri Public Service Commission (Commission) in Case No. TO-2000-374 (NPA Relief) issued a Report and Order (NPA Relief Order) that, among other things, established an 816 NPA Technical and Planning Committee (committee) and directed the committee to file with the Commission a status report and implementation plan and schedule for rate center consolidation in the 816 NPA. The committee provides the following information in compliance with this Order.

Southwestern Bell Telephone Company (SWBT) proposed in the NPA Relief case to investigate the feasibility of consolidating from 13 to five (5) the number of rate centers in the Kansas City metropolitan exchange. The Commission's NPA Relief Order indicates that "[r]ate center consolidation in the 816 NPA has the potential to reduce the number of rate centers from thirteen to five" and ORDERED 3 states that "rate center consolidation shall occur in the 816 NPA as expeditiously as possible and that all incumbent local exchange and competitive local exchange carriers shall comply with the rate center consolidation."

The industry is implementing the consolidation as proposed by SWBT in the case. The rate centers to be consolidated share the same local calling scopes so consolidation will not impact customers' local calling scopes and will not impact their local rates.

Specifically, the industry will implement two consolidations. The first will consolidate eight (8) rate centers into one (1). The second will consolidate two (2) rate centers into one (1). Overall, this will reduce from 13 to five (5) the number of rate centers in the Kansas City metropolitan exchange. The following are the rate centers that will be consolidated within the Kansas City metropolitan exchange:

Rate center consolidation #1:

Kansas City
Gladstone
Independence
Parkville
Raytown
South Kansas City
East Independence
Tiffany Springs

Rate center consolidation #2:

Liberty
Nashua

There are three additional rate centers in the Kansas City metropolitan exchange that have unique calling scopes, and, therefore, will not be consolidated. These rate centers are:

Blue Springs
Lee's Summit
Belton

After the consolidation, the following five (5) rate centers will exist in the Kansas City metropolitan exchange:

[name] for consolidation #1
[name] for consolidation #2
Blue Springs
Lee's Summit
Belton

At this time, SWBT is analyzing its toll data to determine the new vertical and horizontal (V&H) coordinates for the consolidated rate centers. Once SWBT has completed this toll analysis, the updated rate center information will be filed in the Local Exchange Routing Guide (LERG). SWBT will also issue an Accessible letter informing the Competitive Local Exchange Carriers (CLECs) of the planned consolidation and related information. SWBT will then update its internal systems to reflect the consolidated rate centers. The estimated completion date for this rate center consolidation project is March 30, 2001.

Additionally, the committee wishes to bring to the Commission's attention an issue related to rate center consolidation and the requirements for obtaining new Central Office Codes (NXXs). The Federal Communications Commission's Numbering Resource Optimization Order (FCC 00-104 – CC Docket No. 99-200 Numbering Resource Optimization Report and Order and Further Notice of Proposed Rule Making (FCC NRO Report), adopted March 17, 2000) requires that carriers seeking new NXX codes meet a six month-to-exhaust (MTE) requirement whereby all NXX codes in a rate center must be projected to exhaust within six months of requesting a new NXX code (See FCC Rules, §52.15(g)(3)(iii)). Because rate center consolidation expands the area over which this requirement applies (i.e., within the rate center), there is concern that carriers may be unable to meet this six month inventory requirement and will, therefore, be unable to obtain new NXX codes when needed. For example, a carrier that utilizes multiple switching systems within the consolidated rate centers could exhaust the NXX codes within one of its switching systems, however, because the current MTE requirement covers a much broader rate area, a carrier could be denied the required NXX code for the switching system where the

NXXs were about to exhaust. The industry believes the Commission should be aware of the potential for this problem to occur¹. In the event that NANPA denied the requested NXX code, the FCC NRO report contains a provision for the carrier to seek review by the state regulatory commission (See FCC Rules §52.15(g)(3)(iv)).

¹ The FCC has issued a 2nd Report and Order in the above referenced case (NRO Report Case). While the text of the FCC's Order has not been released, it is the committee's understanding that this issue may be addressed in this second FCC Order.

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on December 26, 2000.

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Mimi B MacDonald
Mimi B. MacDonald

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