

Global Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403-2420
Tel 612.343.5400
Fax 612.372.3988



Via Federal Express

February 20, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, Missouri 65102-0360

FILED

FEB 21 2001

Missouri Public
Service Commission

Re: Missouri PSC Case No. TO-2000-374 – 314 Customer Education Plan Costs

Dear Mr. Roberts:

Enclosed please find for the Commission's record, the original and four copies of these brief comments of Global Crossing Local Services, Inc. (GCLSI, the Company) as regards the sharing of costs for the 314 Area Code Customer Education Plan.

In principle, GCLSI is opposed to sharing the costs of broadly based, area code customer education plans based on the number of NXX codes a company holds at the time of an area code change. The Company has not been in any of its markets long enough to have fully utilized, or at least utilized to the same extent as most incumbents, its assigned NXX codes. Therefore, the per customer or per line costs of such plans are disproportionately higher for a CLEC like GCLSI than they most likely would be for an incumbent. In comments filed with Washington Utilities and Transportation Commission in a similar proceeding, GCLSI suggested that cost sharing based on NXX code holding is not competitively neutral and amounts to a competition tax.

However, GCLSI has agreed to contribute to the Missouri 314 Customer Education Plans on an NXX basis. The cost and scope of the 314 Plan are more restrained and reasonable than that which the Company has been presented with in the State of Washington and which it may be presented with in other jurisdictions.

Thank you for your consideration of GCLSI's concerns; if I can provide additional information with respect to these comments, please call me at (612) 343-2491; I can also be reached via e-mail at catherine_murray@globalcrossing.com.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Murray".

Cathy Murray
Manager, State Regulatory Group

Cc: Sara Byak, Staff MPSC
Office of Public Counsel