

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

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

FILED
JUN 23 2000
Missouri Public
Service Commission

REBUTTAL TESTIMONY

OF

HOKE R. KNOX

June 23, 2000

1 **Q. Please state your name and business address.**

2 A. My name is Hoke R. Knox. I am Senior Manager Regulatory Policy for Sprint
3 Corporation. My business address is 6360 Sprint Parkway, Overland Park,
4 Kansas 66251.

5
6 **Q. Have you previously testified before this Commission?**

7 A. Yes, in the direct testimony related to this case.

8
9 **Q. In the Direct Testimony of Barbara Meisenheimer, pages 6 and 30, she**
10 **recommends that the Commission use a back-up relief plan initiated when**
11 **the number of assignable central office codes in the 314 NPA falls below 90.**
12 **Do you agree with this approach?**

13
14 A. No. Ninety NXXs codes will only provide relief for a period of 6 and ½ months
15 based on the rationing of 14 codes per month. Even under Ms. Meisenheimer's
16 estimated usage of 10 codes per month, there is only 9 months to implement the
17 overlay. This does not allow sufficient time to properly execute NPA relief using
18 the existing NPA relief planning process. In FCC 00-104, paragraph 189, carriers
19 are only allowed a six-month inventory of numbers. An NPA relief plan needs to
20 be longer than a carrier's six-month inventory period in order for carriers to have
21 numbering resources when the NPA exhaust. Consumers would be hurt in
22 selecting a carrier without numbering resources when a relief back-up plan is not
23 long enough to provide numbering resources to all providers equally. Relief plans
24 must be properly structured, a minimum of 12 months, and implemented so that
25 exhaust does not occur and impact consumer choices.

26

1 **Q. Ms. Meisenheimer also recommends that the Commission pursue a “wireless**
2 **overlay” instead of an “all services overlay.” (Meisenheimer Direct, pages 7**
3 **and 34) Should the Missouri Commission pursue a wireless only overlay?**
4

5 **A.** No. The FCC has addressed the wireless only overlay issue multiple times and
6 continues to prohibit any technology specific overlay. Competition between
7 wireless and wireline carriers for new customers continues to grow. With a
8 planned wireless number portability date of November 24, 2002, number porting
9 between wireline and wireless carriers will occur. The Commission should not
10 consider what amounts to a deterrent to future competition and choice of provider
11 by consumers, especially as technology begins to blur any differences between
12 wireless and wireline carriers.
13

14 **Q. Does this conclude your testimony?**

15 **A.** Yes.

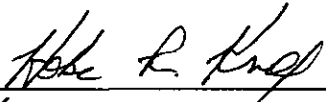
**BEFORE THE PUBLIC SERVICE COMMISSION
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AFFIDAVIT OF HOKE R. KNOX


STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

Hoke R. Knox, of lawful age, on his oath states: That he has participated in the preparation of the attached rebuttal testimony in question and answer form, consisting of _____ pages plus schedules, to be presented in the above case; that the answers in the attached rebuttal testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



Hoke R. Knox

Subscribed and sworn to before me this 14 day of June 2000.



Notary Public

My Appointment Expires: 2/18/01

