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December 1, 2006

Ms. Cully Dale
Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: EMBARQ's Comments in Case No. TX-2007-0086

Dear Ms. Dale:

Embarq Missouri, Inc. (herein referred to as "Embarq") has reviewed the Chapter 37 proposed rules pertaining to number pooling and conservation efforts and provides the following comments for Commission consideration.

The Chapter 37 proposed rules contain six individual sub-sections. Embarq submits that the first five sub-sections are consistent with existing federal requirements and will pose no incremental operational or fiscal impact[1] (although a minor suggestion is made for one of the rules as will be discussed below). The last proposed sub-section, however, is a new reporting requirement that is specific only to Missouri. For reasons discussed below, Embarq urges the Commission to eliminate in its entirety proposed rule **4 CSR 240-37.060 Reporting Requirements.**

Proposed rule **4 CSR 240-37.060 Reporting Requirements** requires the development of a Missouri-specific reporting mechanism. Specifically, this rule requires carriers to report to the Staff via EFIS any assignment or transfer of indirect numbers. Such reporting is unnecessary and will impose unique implementation costs on Missouri carriers.

The MO PSC Staff already has access to this information via the North America Numbering Plan Administrator (NANPA). Specifically, Embarq currently reports intermediate numbers within the semi-annual NANPA reporting requirements which is at the wire-center level. This report is available to the MO PSC Staff. While the NANPA reporting does not include the specific intermediate carrier receiving the numbers, Embarq questions why that

[1] This may not hold true for other ILECs operating within Missouri.

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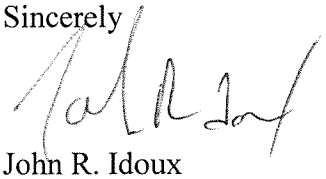
information is needed. If it is, Staff can request the identity of the specific carrier through a data request. For these reasons, Embarq is opposed to this sub-section of the proposed rule due to the additional costs and operational burden in developing a state specific reporting process. Embarq urges the Commission to eliminate this sub-section of the proposed rule in its entirety.

In addition, Embarq offers a minor suggestion to one of the first five sub-sections for clarification purposes. Initial versions of proposed rule **4 CSR 240-37.030 Thousands-Block Number Pooling** contained a reference to the industry-wide standards setting body known as the Alliance for Telecommunications Industry Solutions. The reference to ATIS, however, was removed from the final proposal. Embarq recommends the Commission include such a reference to industry guidelines. The proposed rules are not all encompassing of the number pooling requirements as they do not include all the technical details. To prevent unintentional misinterpretation of technical number pooling requirements, or even intentional gaming of Commission rules by certain carriers, Embarq recommends the following language be added to **4 CSR 240-37.030 Thousands-Block Number Pooling:**

> Thousands-block pooling in each rate center in Missouri will be conducted according to the Alliance for Telecommunications Industry Solutions guidelines and the Industry Numbering Committee's thousands-block pooling administration guidelines as documented at http://www.atis.org/inc/docs.asp or its successor site.

Embarq appreciates the opportunity to work with Staff in the development of these rules and to provide comments in this matter. Please do not hesitate to contact myself if you have any questions.

Sincerely



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