

Mimi B. MacDonald  
Attorney

Southwestern Bell Telephone  
One Bell Center  
Room 3510  
St. Louis, Missouri 63101  
Phone 314 255-4094  
Fax 314 247-0014



September 18, 2000

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

Re: Case No. TO-2000-374

**FILED<sup>2</sup>**  
SEP 18 2000  
Missouri Public  
Service Commission

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight copies of Southwestern Bell Telephone Company's Proposed Findings of Fact, Conclusions of Law and Order

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

*Mimi B. MacDonald /tm*

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

SEP 18 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. )

**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

**Procedural History**

1. On December 17, 1999, the North American Numbering Plan Administrator NeuStar, Inc. ("NANPA"), in its role as the neutral third-party Number Plan Administrator ("NPA") Relief Planner for Missouri under the North American Numbering Plan ("NANP") and acting on behalf of the Missouri telecommunications industry, filed a pleading requesting that the Commission approve: (a) a retroactive all-services overlay relief plan for the 314 Number Plan Area ("NPA"), i.e. extending the current 636 NPA to encompass the existing 314 NPA; and (b) a single all services overlay relief plan for the 816 NPA, both of which were developed through industry consensus.

2. On December 27, 1999, the Staff of the Missouri Public Service Commission ("Staff") requested the Commission to allow it to file a recommendation on or before February 11, 2000, so that it would have sufficient time to investigate and prepare a recommendation.

3. On December 29, 1999, the Office of Public Counsel ("OPC") requested that it be allowed until February 11, 2000, to file its recommendation and response to the petition. OPC also requested that notice be given to the public and to state and local governmental officials in the St. Louis and Kansas City metropolitan areas, and that an intervention period be set.

114

Additionally, OPC requested that evidentiary and public hearings be held. Finally, OPC requested that the Commission establish a Technical Committee including representatives of the interested parties similar to the process used in TO-98-212, TO-95-289, and TO-96-1.

4. On January 5, 2000, the Missouri Public Service Commission ("the Commission") issued its Order and Notice of Petition. The Commission ordered the Records Department of the Commission to send notice to all interexchange and local exchange telecommunications companies in Missouri. The Commission also order the Records Department to send notice to the mayor of the City of St. Louis and the county commission of each county in the current 314, 636, and 816 NPAs. Additionally, the Commission ordered the Information Officer of the Commission to send notice of this order to the publisher of each newspaper located in the 314, 636, and 816 NPAs, and to the members of the General Assembly representing districts in the 314, 636, and 816 NPAs. The Commission ordered the Staff and OPC to file their responses and recommendations regarding the petition no later than February 11, 2000. Finally, the Commission ordered that anyone wishing to intervene or to participate without intervention shall file an application to intervene or to participate no later than February 4, 2000.

5. On January 19, 2000, Gabriel Communications of Missouri, Inc. ("Gabriel") filed its Motion to Intervene.

6. In January 21, 2000, the Missouri Independent Telephone Group ("MITG") filed its Application to Intervene.

7. On January 25, 2000, CyberTel Cellular Telephone Company and CyberTel RSA Limited Partnership, d/b/a Ameritech Cellular ("Ameritech Cellular") filed its Application to Intervene.

8. On January 31, 2000, Birch Telecom of Missouri, Inc. ("Birch") filed its Motion to Intervene.

9. On February 1, 2000, Sprint Missouri, Inc., Sprint Communications Company, L.P., and Sprint Spectrum, L.P., d/b/a Sprint PCS (collectively referred to as "Sprint") filed their Application to Intervene.

10. On February 3, 2000, Nextlink Missouri, Inc. ("Nextlink") filed its Application to Intervene.

11. Also on February 3, 2000, the Commission issued an Order and Notice Directing Filing of Proposed Procedural Schedule directing Staff to file a proposed procedural schedule by February 14, 2000, and providing NANPA and OPC an opportunity to provide suggestions regarding the proposed procedural schedule.

12. On February 4, 2000, GTE Midwest Incorporated ("GTE") filed its Application to Intervene. That same day, AT&T Communications of the Southwest, Inc. ("AT&T") filed its Application to Intervene.

13. On February 7, 2000, Southwestern Bell Telephone Company ("SWBT") filed its Application to Intervene and Request for Leave to File Application to Intervene Out of Time.

14. On February 14, 2000, OPC filed its response to the petition.

15. On February 15, 2000, the Staff filed its response to the petition and included a proposed procedural schedule. Staff indicated that OPC and NANPA consented to the proposed procedural schedule.

16. On February 23, 2000, Ameritech Cellular filed a Motion to Establish a Protective Order.

17. On March 1, 2000, the Commission issued its Order Adopting Procedural Schedule, Granting Interventions, and Issuing Protective Order. In that Order, the Commission granted intervention to the following parties: Gabriel, MITG, Ameritech Cellular, Birch, Sprint, Nextlink, GTE, AT&T, and SWBT. The Commission adopted the standard Protective Order. Finally, the Commission established a procedural schedule. The Commission requested the Staff of the Missouri Public Service Commission ("Staff") to file a pleading recommending locations for public hearing sites.

18. On March 13, 2000, Staff filed its Recommendation, listing proposed sites for public hearings.

19. On March 14, 2000, Staff filed a Motion to Modify Procedural Schedule. Staff indicated that the parties anticipated an order by the Federal Communications Commission ("FCC") addressing number pooling and other issues relevant to this case. Staff and the parties proposed modification to the procedural schedule to allow the parties to address the anticipated order in their evidentiary and legal presentations to the Commission.

20. On March 20, 2000, the Commission issued its Order Modifying Procedural Schedule.

21. On April 13, 2000, the Commission issued its Order Scheduling Local Public Hearings. In that Order, the Commission ordered that local public hearings should be held: (a) on Monday, April 24, 2000, in the Hickey Room, at Harris-Stowe State College, 3026 Laclede, St. Louis, Missouri, commencing at 12:30 p.m.; (b) on Monday, April 24, 2000, in the Conference Room, at the Office of the Missouri Public Service Commission, 815 Charter Commons Drive, Suite 100B, Chesterfield, Missouri, commencing at 6: 30 p.m.; (c) on Monday, April 24, 2000, in the Multipurpose Room, at the O'Fallon Municipal Center, 100 North Main

Street, O'Fallon, Missouri, commencing at 6:30 p.m.; (d) on Wednesday, May 3, 2000, in the Legislative Assembly Area, Room 204, at the Jackson County Courthouse, 415 East 12<sup>th</sup> Street, Kansas City, Missouri, commencing at 12:30 p.m.; (e) on Wednesday, May 3, 2000, in the Council Chambers, at the St. Joseph City Hall, 11<sup>th</sup> & Federick, St. Joseph, Missouri, commencing at 6:30 p.m.; and (f) on Wednesday, May 3, 2000, in Fleming Hall, at the Jackson County Park Facility in Blue Springs, 21906 Woods Chapel Road, Blue Springs, Missouri, commencing at 6: 30 p.m.

22. On May 10, 2000, Southwestern Bell Wireless, Inc. filed its Application to Intervene and Request for Leave to file Application to Intervene Out of Time.

23. On May 10, 2000, interested parties filed Direct Testimony.

24. On May 11, 2000, NeuStar, Inc. requested leave to file out of time the affidavit of Sondra L. Tokarek, for the testimony of Ms. Tokarek which was stamp-filed on May 11, 2000.

25. On May 17, 2000, GTE filed the affidavit of John C. Rollins, for the testimony of Mr. Rollins that was filed on May 10, 2000.

26. On May 26, 2000, the Commission issues its Order Granting Late Filing of Affidavits and Intervention. In that Order, the Commission granted both NeuStar's and GTE's request to file late-filed affidavits. The Commission also granted Southwestern Bell Wireless, Inc.'s Application to Intervene.

27. On May 30, 2000, ExOp of Missouri ("ExOp") filed its Motion to Intervene Out of Time.

28. On June 9, 2000, the Commission issued its Order Granting Late Intervention. In that Order, the Commission granted ExOp's Motion to Intervene Out of Time.

29. On June 23, 2000, interested parties filed Rebuttal Testimony.

30. On July 12, 2000, interested parties filed Surrebuttal Testimony.

31. On July 17, 2000, a Prehearing Conference was held.

32. On July 19, 2000, Staff filed a List of Issues, an Order of Witnesses, and an Order of Cross-Examination.

33. On July 21, 2000, the Commission issued its Notice and Order Directing Responses and Supplemental Position Statements. In that Order, the Commission modified the procedural schedule to allow the parties to address the Commission's delegated authority to adopt numbering resource optimization strategies by filing supplemental position statements with suggestions in support no later than July 27, 2000. The Commission indicated that the parties should be prepared to address these matters at hearing and in post-hearing briefs.

34. On July 24, 2000, Staff filed a Proposed Witness Schedule and Order of Opening Statements. That same day, all parties filed Statements of Positions.

35. On July 26, 2000, Nextel West, Inc. ("Nextel") filed its Application to Intervene.

36. On July 27, 2000, interested parties filed Supplemental Statements of Position.

37. An evidentiary hearing was held on July 31, 2000, and August 1, 2000. Nextel's Application to Intervene was granted.

38. On September 18, 2000, interested parties filed their post-hearing Brief.

I. Issue 1: What, If Any, Action Should The Commission Take Regarding Number Conservation (i.e. Number Pooling, Sequential Numbering Assignments, etc.) In The Following NPAs?

(a) 314

(b) 816

### Findings Of Fact

1. In the FCC's Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Numbering Resource Optimization, ("FCC NRO Order") CC Docket No. 99-200, March 31, 2000, the FCC adopted thousands-block number pooling as a mandatory nationwide resource optimization strategy. Thousands-block number pooling involves breaking up the 10,000 numbers in an NXX into ten sequential blocks of 1,000 numbers each, and allocating each thousands-block potentially to different service providers within the same rate center. A Pooling Administrator, an independent third-party, coordinates the allocation of thousands-block numbers to particular service providers. Thousands-block pooling has the potential of delaying the exhaust of NPAs.

2. In the FCC's Order, In the Matter of Numbering Resource Optimization, ("FCC NRO Order II") CC Docket No. 99-200, et al., July 20, 2000, the FCC conditionally granted the Commission the authority to institute thousands-block number pooling in the 314 NPA.

3. Between the time the Commission requested delegated authority to implement a state number pooling trial in the 314 NPA, and the time the FCC issued its FCC NRO Order II, NANPA revised its projected exhaust date of the 314 NPA from the third quarter of 2001 to the second quarter of 2001. With this revision, and the FCC's delay in granting interim authority, the FCC requirement, as set forth in the FCC NRO Order, that the NPA in question has a remaining life span of at least one year, cannot be met. Further, if the Commission were to implement a state number pooling trial, it would take time to: (a) select a Pooling Administrator; (b) devise and implement number pooling including allowing sufficient time for carriers to modify their databases and switches; and (c) develop a cost recovery mechanism for the joint and carrier-specific costs of implementing and administering pooling. Moreover, other FCC requirements



also reduce the value of a pooling trial in the 314 NPA. Specifically, states must ultimately follow the national requirements on technical standards and pooling administration.

4. Similarly, a state number pooling trial in the 816 NPA will not appreciably advance number pooling much ahead of the implementation of national number pooling since: (a) the 816 NPA should be a priority for number pooling when the national rollout begins; (b) conducting a state number pooling trial would require the Commission to select a Pooling Administrator which would likely require a competitive bid process; and (c) the industry would require time to work through the requirements process and make necessary changes to implement a state number pooling trial. Moreover, since states must ultimately follow the national requirements on technical standards and pooling administration, implementation of a state number pooling trial may result in inconsistent requirements on technical standards and pooling administration that would later have to be remedied. Further, if the Commission elected to conduct a state number pooling trial regarding the 816 NPA, the Commission would be required to develop its own cost recovery mechanism for since joint and carrier-specific costs of implementing and administering number pooling. This could result in a surcharge for the state number pooling trial followed by another surcharge once national number pooling is implemented.

5. In the FCC NRO Order, the FCC adopted a flexible sequential numbering requirement which mandates that carriers first assign all available telephone numbers within an opened thousands-block before opening another thousands-block, unless the available numbers in the opened thousands-block are not sufficient to meet a customer's request. The FCC mandated that all commissions are required to conform their existing sequential numbering assignment requirements to this flexible sequential numbering requirement by January 1, 2001.

6. In the FCC NRO Order, the FCC granted authority to state commissions to investigate and determine whether code holders have activated NXXs assigned to them. The FCC concluded that the definition of activating an NXX code or "placing an NXX code in service" should be clarified to mean not just activation of the code through transmission of the local routing information to the LERG, but also that the carrier has begun to activate and assign numbers within the NXX code to end users. An NXX code assignee must activate the NXX code within six (6) months of assignment. The FCC specified that a state commission may request proof from all code holders that NXX codes have been activated and assignment of numbers has commenced.

7. In the FCC NRO Order, the FCC mandated that all carriers that receive numbering resources from NANPA, or that receive numbering resources from a Pooling Administrator in thousands blocks, report forecast and utilization data to NANPA. The FCC concluded that each reporting carrier must provide year-by-year and five-year projections of its expected resource requirements. The FCC further concluded that each reporting carrier must report five categories of numbers: assigned, intermediate, reserved, aging, and administrative. Finally, the FCC concluded that the maximum number of reports that any carrier should be required to file in any year is two.

8. In the FCC NRO Order II, the FCC conditionally granted the Commission the authority to maintain rationing procedures for six months after area code relief is implemented.

9. In the FCC NRO Order II, the FCC conditionally granted the Commission authority to implement NXX code sharing.

10. In the FCC NRO Order II, the FCC conditionally granted the Commission authority to conduct audits of carrier's use of numbering resources within the parameters established by the FCC NRO Order.

#### Conclusions of Law

1. The Commission finds that a state number pooling trial regarding the 314 NPA will not provide significant benefit to telephone subscribers and the telecommunications industry at this time. A state number pooling trial regarding the 314 NPA will, quite simply, not provide enough time to deploy pooling much ahead of the national rollout schedule. It would be more efficient for Missouri to wait for the national rollout schedule regarding the 314 NPA. Thus, the Commission declines to implement a state number pooling trial regarding the 314 NPA.

2. A state number pooling trial in the 816 NPA would not provide significant benefits to either telephone subscribers or the telecommunications industry. Thus, the Commission declines to implement a state number pooling trial regarding the 816 NPA.

3. Because the FCC Rules regarding thousands-block sequential numbering assignments are currently in effect, the Commission declines to adopt requirements regarding thousands-block sequential numbering assignments.

4. The Commission will immediately begin to investigate and determine whether code holders have activated NXX codes assigned to them, and if the code holders have not done so, the Commission will direct NANPA to reclaim unused numbering resources.

5. The Commission concluded that all service providers shall submit forecasting and utilization data to NANPA on a semi-annual basis. Because the FCC requires such data to be submitted to NANPA, the Commission declines to require telecommunications providers to duplicate their efforts by submitting such data to the Commission.

6. The Commission declines to order further rate center consolidation in the 314 NPA because such consolidation would require changes in local calling scopes and local rates. The Commission, however, believes that rate center consolidation in the 816 NPA would be beneficial. The Commission, therefore, requests SWBT to consolidate its rate centers in the 816 NPA so long as such consolidation does not impact customers' calling scopes or rates. Any rate center consolidation that is accomplished by SWBT, shall be matched by the CLECs operating in the rate centers being consolidated.

7. Code rationing is not necessary after area code relief is implemented to ensure that customers in Missouri will be able to obtain their choice of service providers. The Commission, therefore, declines to maintain rationing procedures for six months after area code relief is implemented.

8. NXX code sharing is an alternative to number pooling and has not been fully evaluated, as has number pooling. Because the industry is moving forward with national number pooling and NXX code sharing has not been fully evaluated, the Commission declines to implement NXX code sharing.

9. If the Commission suspects that a carrier is misusing numbering resources, the Commission will audit the carrier's use of numbering resources within the parameters established by the FCC.

II. Issue 2: What Area Code Relief Should The Commission Order Implemented In The Following NPAs?

(a) 314

(b) 816

**Findings of Fact**

1. According to the April, 2000 projections of NANPA, the 314 NPA is expected to exhaust during the second quarter 2001. On April 17, 2000, NANPA declared the 314 NPA to be in jeopardy. The industry recommends a retroactive overlay for the 314 NPA. A retroactive overlay extends the boundary of the existing 636 NPA so that it would overlay the 314 NPA and the 636 CO does would be assigned in the 314 NPA as needed.

2. A retroactive overlay regarding the 314 NPA will: (a) postpone the immediate need for a third area code in the St. Louis metropolitan area; (b) result in a more efficient utilization of numbering resources; (c) ensure that the third NPA that would no longer be immediately used in this region, would be available to extend the overall life of the NANP as it exists today, thereby delaying the time before the NANP is required to be expanded to more than 10 digits; (d) create a consistent local dialing pattern in the St. Louis metropolitan area; (e) ensure that the Commission would not again confront difficult NPA relief decisions in either the 314 or 636 NPAs, such as those that are presented in this case, so long as any subsequent relief is in the form of an overlay; and (f) re-unite communities of interest in that the 314 and 636 NPAs would be considered to represent the St. Louis metropolitan area.

3. According to the April, 2000 projections of NANPA, the 816 NPA is expected to exhaust the first quarter 2002.

4. The benefits of an overlay for the 816 NPA outweigh those of a geographic split. First, customers would not have to change their 10-digit telephone numbers or learn new

telephone numbers for their friends and associates. Customers would not have to incur immediate expenses for associated costs; for example, changes to personal and business checks, business cards, advertisements and stationary. Second, a reasonably balanced geographic split would require splitting the Kansas City Metropolitan Calling Area, thus leading to a significant amount of 10-digit dialing for local calls and a significant number of customers who would be required to change their telephone numbers. Third, once an overlay is implemented and mandatory 10-digit dialing is introduced, existing consumers will not again have to be exposed to the requirement of changing their telephone numbers so long as overlays continue to be the mandated form of relief. Fourth, an overlay would ensure that communities of interest would not be divided.

5. The recent shift to 10-digit dialing in eliminating the protected codes in the 913 NPAs between Missouri and Kansas demonstrates customers' ability to adjust to 10-digit dialing.

6. SWBT's and GTE's experiences in Dallas and Houston show that customers adapt to 10 digit dialing after getting through the initial implementation phase.

7. Although there are no 9-1-1 issues associated with the 314 NPA, there are 9-1-1 issues associated with the 816 NPA. Specifically, the Hedrick central office that serves the Kansas City 9-1-1 community today, does not have any spare NPD slots available in that office. Thus, a new 9-1-1 configuration will have to be designed.

8. Although the Office of Public Counsel suggest that the Commission should establish utilization thresholds of 90 and 100 NXX codes as a trigger for area code relief in the 314 and 816 NPA respectively, the Commission rejects the Office of Public Counsel's proposal because: (a) it runs the risk of not allowing the industry or consumers ample time to prepare for area code relief; and (b) it runs the risk of not allowing telecommunications service providers the

ability to obtain NXX codes and, therefore, runs the risk of not allowing consumers the ability to subscribe to services from their carrier of choice.

### **Conclusions of Law**

1. The Commission orders a retroactive overlay for the 314 NPA. The Commission orders the industry, working with NANPA, to ensure that the 314 NPA remains "pure." In other words, the 314 NXX codes shall be preserved for assignment in the 314 geography.

2. The Commission orders an all-services overlay for the 816 NPA. This relief should be implemented as soon as possible in order to allow 9-1-1 service providers time to upgrade their 9-1-1 systems in order to ensure that 9-1-1 service will not be affected by this area code relief.

### **IT IS THEREFORE ORDERED:**

1. The Commission declines to implement a state number pooling trial regarding the 314 NPA.

2. The Commission declines to implement a state number pooling trial regarding the 816 NPA.

3. The Commission declines to adopt requirements regarding thousands-block sequential numbering assignments.

4. The Commission will immediately begin to investigate and determine whether code holders have activated NXX codes assigned to the, and if the code holders have not done so, the Commission will direct NANPA to reclaim unused numbering resources.

5. The Commission declines to require telecommunications providers to submit forecast and utilization data to the Commission as such providers are already required to submit such data to NANPA.

6. The Commission declines to order further rate center consolidation in the 314 NPA. The Commission request SWBT to consolidate its rate centers in the 816 NPA so long as such consolidation does not impact customers' calling scopes or rates. Any rate center consolidation that is accomplished by SWBT, shall be matched by the CLECs operating in the rate centers being consolidated.

7. The Commission declines to maintain rationing procedures for six months after area code relief is implemented.

8. The Commission declines to implement NXX code sharing.

9. If the Commission suspects that a carrier is misusing numbering resources, the Commission will audit the carrier's use of numbering resources within the parameters established by the FCC.

10. The Commission orders a retroactive overlay for the 314 NPA. The Commission order the industry, working with NANPA, to ensure that 314 NXX codes will be preserved for assignment in the 314 geography.

11. The Commission orders an all-services overlay for the 816 NPA.

12. That this /order shall become effective on \_\_\_\_\_, 2000.

**BY THIS COMMISSION**

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



Respectfully submitted,

BY Mimi B. MacDonald /tm

PAUL G. LANE, #27011

LEO J. BUB, #34326

ANTHONY K. CONROY, #35199

MIMI B. MACDONALD, #37606

Attorneys for Southwestern Bell Telephone  
Company

One Bell Center, Room 3510

St. Louis, Missouri 63101

(314)235-4094 (Telephone)

(314)247-0014 (Facsimile)

mm8072@momail.sbc.com

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on September 18, 2000.

Mimi B. MacDonald /tm  
Mimi B. MacDonald

JULIE KARDIS  
MARC POSTON  
MISSOURI PUBLIC SERVICE  
COMMISSION  
301 W. HIGH STREET, SUITE 530  
JEFFERSON CITY, MO 65101

PAUL S. DEFORD  
LATHROP & GAGE  
2345 GRAND BLVD, SUITE 2500  
KANSAS CITY, MO 64108

MICHAEL F. DANDINO  
OFFICE OF THE PUBLIC COUNSEL  
301 W. HIGH STREET, SUITE 250  
JEFFERSON CITY, MO 65101

WILLIAM R. ENGLAND, III  
BRYDON, SWEARENGEN & ENGLAND  
PO BOX 456  
JEFFERSON CITY, MO 65102

PETER MIRAKIAN, III  
WENDY DEBOER  
SPENCER FAIN BRITT & BROWNE LLP  
1000 WALNUT STREET, SUITE 1400  
KANSAS CITY, MO 64106

CRAIG S. JOHNSON  
ANDERECK, EVANS, MILNE, PEACE  
& JOHNSON, L.L.C  
P.O. BOX 1438  
JEFFERSON CITY, MO 65102

JAMES F. MAUZE  
THOMAS E. PULLIAM  
OTTSEN, MAUZE, LEGGAT & BELZ,  
112 SOUTH HANLEY  
ST. LOUIS, MO 63105

JAMES M. FISCHER  
FISCHER & DORITY  
101 WEST MCCARTY ST, SUITE 215  
JEFFERSON CITY, MO 65101

MARK W. COMLEY  
NEWMAN, COMLEY & RUTH P.C.  
601 MONROE, SUITE 301  
P.O. BOX 537  
JEFFERSON CITY, MO 65102

LINDA K. GARDNER  
SPRINT MISSOURI, INC.  
5454 W. 110TH STREET  
10TH FLOOR  
OVERLAND PARK, KS 66211

EDWARD J. CADIEUX  
CAROL KEITH  
GABRIEL COMMUNICATIONS, INC.  
16090 SWINGLEY RIDGE RD., STE 500  
CHESTERFIELD, MO 63006

KENNETH L. JUDD  
SOUTHWESTERN BELL WIRELESS, INC.  
13075 MANCHESTER ROAD 100N  
ST. LOUIS, MO 63131

LEE S. ADAMS  
CHERYL A. TRITT  
KIMBERLY D. WHEELER  
MORRISON & FOERSTER, L.L.P.  
2000 PENNSYLVANIA AVENUE, NW  
SUITE 5500  
WASHINGTON, D.C. 20006

CARL J. LUMLEY  
LELAND B. CURTIS  
CURTIS OETTIN HEINZ  
GARRETT & SOULE, P.C.  
130 S. BEMISTON, SUITE 200  
ST. LOUIS, MO 63105

KEVIN ZARLING  
AT&T COMMUNICATIONS OF THE  
SOUTHWEST, INC  
919 CONGRESS, SUITE 900  
AUSTIN, TX 78701

JAMES ROHFLING  
BRASIL & ROHFLING PC  
6390 LINDELL BOULEVARD  
ST. LOUIS, MO 63108