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July 24, 2000

Via Facsimile and FedEx

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, MO 65101

Re: Case No.: TO-2000-374

FILED²
JUL 24 2000
Missouri Public
Service Commission

Dear Judge Roberts:

I have enclosed for filing in the above-captioned case an original and eight copies of the Position Statement of ExOp of Missouri, Inc. Copies of this Position Statement are being served on the Office of the Public Counsel as well as each of the other parties to this case.

Thank you for bringing this filing to the Commission's attention.

Yours truly,



Pete Mirakian

cc: Mr. Thomas W. White

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUL 24 2000

Missouri Public
Service Commission

In the Matter of the Petition of the North)
American Numbering Plan Administrator)
On Behalf of the Missouri Telecommunications)
Industry, for Approval of NPA Relief Plan for)
The 314 and 816 Area Codes.)

Case No. TO-2000-374

POSITION STATEMENT OF EXOP OF MISSOURI, INC.

COMES NOW ExOp of Missouri, Inc. ("ExOp") and for its Position Statement states as follows:

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

ExOp does not operate in the 314 NPA, so it takes no position with respect to the action the Commission should take regarding number conservation in the 314 NPA.

(b) 816

The testimony in this case has shown that number exhaust cannot be remedied by number conservation measures alone. ExOp supports rate center consolidation (in particular) and other conservation options as a companion to the NPA overlays discussed below. ExOp does not favor rapid implementation of the number conservation measures under consideration in this case for two reasons: (i) such measures only provide minimal relief and (ii) the impact of these measures requires careful analysis.

ExOp's primary concern has to do with implementing thousand block number pooling. It took several months for ExOp's current 903 NXX to be programmed into the switches and PBXs of all the telephone companies and businesses in the Kansas City area. Issuing numbers in thousand-block pools threatens to lead to numerous repetitions of this slow process of

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transmitting and inputting local routing numbers throughout the marketplace. ExOp intends to comply with the FCC's order regarding thousand block number pooling, but ExOp does not support the Commission's moving this process along any faster than the FCC's implementation schedule requires.

ExOp does favor, and is implementing, rate center consolidation. ExOp currently serves only the Kearney exchange, but it plans to begin offering service in Platte City in the near future. When ExOp extends its network into Platte City, ExOp plans to continue to use its current NXXs for customers located in both Kearney and Platte City, thus treating both cities as a single rate center.

2. What area code relief should the Commission order implemented in the following NPAs:

(a) 314

ExOp takes no position on this issue.

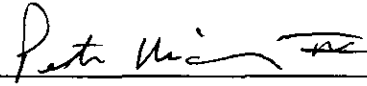
(b) 816

Recognizing the need for additional NXXs throughout the 816 NPA, ExOp supports the proposed all-services overlay for the 816 NPA. An all-services overlay for the 816 NPA will avoid the disruption that would be caused by splitting the 816 NPA and assigning entirely new telephone numbers to customers in the new NPA. In addition, although a geographic split would provide additional NXXs, an overlay can be implemented faster and more efficiently than a split. Although an all-services overlay will require 10-digit dialing throughout the NPA, ExOp's customers in the 816 NPA are already becoming accustomed to dialing 10 digits when they make local calls to numbers on the Kansas side of the state line and would not be significantly affected by having to dial 10 digits for all local calls. ExOp thus urges the Commission to adopt an all-services overlay as the better area code relief alternative in the 816 NPA.

WHEREFORE, ExOp of Missouri, Inc. respectfully requests that the Commission accept the foregoing as ExOp's Position Statement in this case.

Respectfully submitted,

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ATTORNEYS FOR EXOP OF
MISSOURI, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Position Statement has been served via U.S. mail, facsimile, or electronically on the persons listed below, on this 24th day of July, 2000.

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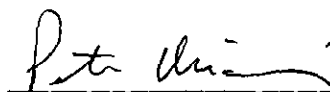
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