

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED

AUG 29 2002

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 Code)

Case No. TO-2000-374

**RESPONSE OF SPRINT REGARDING STAFF'S STATUS REPORT
AND MOTION TO CLOSE CASE**

COMES NOW Sprint Communications Company, L.P. and Sprint Missouri, Inc.,
d/b/a Sprint (herein collectively referred to as "Sprint") and hereby provides this response
to Staff's Status Report and Motion to Close Case.

1. In its December 18, 2001 Order in this docket the Commission, among
other matters, directed the industry to file proposal(s) reflecting recommended cost
recovery procedures for carrier specific costs related to the Missouri state specific
number pooling trials that have been mandated by the Commission for the 314 and 816
NPAs. In that order the Commission directed that the industry submit a proposal for
recovery of carrier specific costs, including joint costs allocated to a specific carrier, by
no later than March 22, 2002.

2. As the Staff correctly noted in its April 22, 2002 Report, the industry did not
submit a recovery proposal. Sprint, along with Southwestern Bell Telephone ("SWBT"),
both filed responses on March 22, 2002; however, neither company put forward a
specific cost recovery proposal at that time due to the unknown nature of the costs.
Both companies sought additional time to develop a cost recovery proposal.
Subsequently, SWBT on May 7, 2002, withdrew its request for a special cost recovery

mechanism due to an internal business decision that its resources would be better used on projects other than a cost recovery surcharge.

3. In its August 19, 2002, Status Report and Motion to Close Case, Staff requested that the Commission deny Sprint's March 22 request for a delay in proposing a cost recovery proposal as moot and to close this case.

4. In response, Sprint joins SWBT and withdraws any pending requests for additional time to develop a cost recovery proposal and joins Staff in its request to close this case.

WHEREFORE Sprint respectfully requests the Commission consider these comments.

Respectfully submitted,

SPRINT

Lisa Creighton Hendricks

Lisa Creighton Hendricks - MO Bar #42194

6450 Sprint Pkwy

MS: KSOPHN0212-2A253

Overland Park, KS 66251

Voice: 913-315-9363 Fax: 913-523-9769

Lisa.c.creightonhendricks@mail.sprint.com

By David Bergman

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on this 29th day of August, 2002, a copy of the above and foregoing was served by first class and/or electronic mail to each of the following parties.

Lisa Creighton Hendricks

Lisa C. Creighton Hendricks

by db

¹ See Response of Sprint Regarding Cost Allocation And Cost Recovery For State Number Pooling Trials, March 22, 2002.

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Mark W. Comley
Newman, Comley & Ruth, P.C.
P.O. Box 537
Jefferson City, MO 65102

W. R. England, III
Brydon, Swearengen & England
P.O. Box 456
Jefferson City, MO 6510

Craig S. Johnson
Andereck, Evans, Milne, Peace
& Baumhoer
P.O. Box 1438
Jefferson City, MO 65102

Wendy Deboer/Peter Mirakian
Spencer, Fane, Britt & Browne, LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106-2140

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, Heinz, Garrett
& Soule, P.C.
130 S. Bemiston, Suite 200
St. Louis, MO 63105

Anthony K. Conroy
Southwestern Bell Telephone Co.
One Bell Center, Room 3510
St. Louis, MO 63101

J. Steve Weber
101 W. McCarty, Suite 216
Jefferson City, MO 65102
Jsweber@att.com

Rebecca B. DeCook
1875 Lawrence Street, Suite 1575
Denver, Colorado 80202
Rdecook@lga.att.com

Kevin Zarling
At&T Communications
919 Congress, Suite. 900
Austin, Texas 78701

Lee S. Adams/Cheryl Twitt
Kimberly Wheeler
Morrison & Foerster LLP
2000 Pennsylvania Ave., Suite. 5500
Washington, D.C. 20006

Edward J. Cadieux
Carol Keith
Gabriel Communications, Inc.
16090 Swingley Ridge Rd., Suite 500
Chesterfield, MO 63006

James M. Fischer
Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

James F. Mauze, Esq.
Thomas E. Pulliam, Esq.
Ottsen, Mauze, Leggat & Belz, LC
112 S. Hanley Road
St. Louis, MO 63105

James Rohfling
Brasil & Rohfling
6390 Lindell Blvd.
St. Louis, MO 63108

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, New Jersey 07090