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August 2, 2001

FILED<sup>3</sup>

AUG 02 2001

Missouri Public  
Service Commission

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison St., Suite 100  
Jefferson City, Missouri 65101

Re: **Case No. TO-2000-374**

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case are an original and eight copies of Southwestern Bell Telephone Company's Response to Office of Public Counsel's Motion to Further Postpone Implementation Dates for 314 NPA and 816 NPA Relief Plans.

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

Very truly yours,

*Anthony K. Conroy Hm*

Anthony K. Conroy

Enclosure

cc: Attorneys of Record

FILED<sup>3</sup>  
AUG 02 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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. )

Missouri Public  
Service Commission

**SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE  
TO OFFICE OF PUBLIC COUNSEL'S MOTION TO FURTHER  
POSTPONE IMPLEMENTATION DATES FOR 314 NPA AND 816  
NPA RELIEF PLANS**

COMES NOW Southwestern Bell Telephone Company (SWBT), and for its Response to Office of Public Counsel's (OPC's) Motion to Further Postpone Implementation Dates for 314 NPA and 816 NPA Relief Plans (Motion to Further Postpone), states to the Missouri Public Service Commission as follows:

1. In its Motion to Further Postpone, OPC requests the Commission to further postpone implementation of the 314 NPA and 816 NPA relief plans. Pursuant to the Commission's April 17, 2001, Order Extending the 314 NPA and 816 NPA Relief Plan Implementation Dates, the current implementation dates for permissive dialing and mandatory dialing for the 314 NPA (557 overlay) are January 1, 2002, and May 5, 2002, respectfully. The current corresponding implementation dates for the 816 NPA (975 overlay) are May 5, 2002, and September 8, 2002, respectively.<sup>1</sup> In this order, the Commission also directed the technical implementation subcommittees for the 314 and 816 NPAs, along with the Commission Staff, to file reports no later than August 31, 2001, providing information to determine whether relief may be extended again for either of the NPAs, and to propose any suggested extension dates.

<sup>1</sup> On July 13, 2001, members of the industry filed a joint pleading seeking minor modifications to these implementation dates. That joint motion has not yet been ruled upon by the Commission.

2. SWBT does not disagree with OPC that it may be advisable, based upon an appropriate factual record, to further delay implementation of the 557 overlay planned for the 314 NPA and/or the 975 overlay planned for the 816 NPA. However, as described below, it is clearly premature to do so at this time.

3. As contemplated by the Commission's April 17, 2001, Order Extending the 314 NPA and 816 NPA Relief Plan Implementation Dates, the Commission should wait until it has an opportunity to review the reports from the technical implementation subcommittees for the 314 and 816 NPAs and the Commission Staff (due to be filed no later than August 31, 2001) along with any reports filed by any other parties by that date, and any responses to these reports, due to be filed no later than September 7, 2001, to address any possible further extensions of the implementation dates for the 314 NPA and 816 NPA relief plans. Once the Commission has an opportunity to review and consider these reports, it will be in a much better position to address OPC's request for a further extension. If the facts contained in these reports support an additional extension of the 314 and 816 NPA relief plans, the Commission may extend those dates at that time.

4. SWBT would also point out, as it did in its April 5, 2001 Response to OPC's Motion for Modification of the Implementation Dates for Area Code Relief, that it would be prudent for the Commission to continue to evaluate the impact of the FCC's national implementation of number pooling. The FCC has selected an administrator for number pooling, and the timeline dictated by the FCC's March 31, 2000 order in the Number Resource Optimization proceeding<sup>2</sup> would require the administrator to establish its initial rollout schedule

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<sup>2</sup> In the Matter of Number Resource Optimization, CC Docket No. 99-200, Report and Order and Further Notice of Proposed Rulemaking, rel. March 31, 2000.

for national number pooling by the end of August. It may be possible to implement national number pooling in both the 314 and 816 NPAs prior to the need for implementing the overlays. However, until the schedule is released, it would be premature to attempt to evaluate the impact national number pooling would have on the need for the new overlay NPAs in the existing 314 and 816 NPAs.

WHEREFORE, SWBT respectfully requests that the Commission refrain from ruling on OPC's Motion to Further Postpone Implementation Dates for 314 NPA and 816 NPA Relief Plans at this time. As described above, SWBT recognizes that further delay may be appropriate. However, the Commission should wait to consider whether an additional extension of the 314 and 816 NPA relief plan implementation dates is appropriate until after it receives the reports from the technical implementation subcommittees and Staff (and any other interested party) on August 31, 2001, and any responses thereto on September 7, 2001, and after the initial rollout schedule for national number pooling is available.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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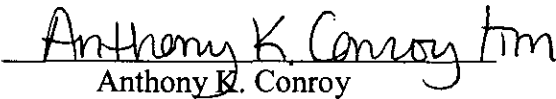
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**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 2, 2001.

  
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