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February 14, 2000

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

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

**FILED**

FEB 15 2000

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **STAFF RECOMMENDATION AND PROPOSED PROCEDURAL SCHEDULE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Julie A. Kardis*

Julie A. Kardis  
Assistant General Counsel  
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JAK:sw  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

FEB 15 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 Code. )

Case No. TO-2000-374

**STAFF RECOMMENDATION AND PROPOSED PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its recommendation and proposed procedural schedule states:

1. On January 5, 2000, the Missouri Public Service Commission (Commission) issued its Order and Notice of Petition (Order) in this case. The Order directed Staff to file a recommendation regarding the North American Numbering Plan Administrator's (NANPA) petition filed on behalf of the Missouri Telecommunications Industry (Petition). In the attached Memorandum, which is labeled Appendix A, Staff recommends that, in the 314 Numbering Plan Area (NPA), the Commission approve and implement either an all-services distributed overlay of the 314 NPA or the industry's proposal to first implement a retroactive overlay and subsequently an all-services distributed overlay. In addition, Staff recommends that the Commission approve and implement an all-services distributed overlay in the 816 NPA as proposed by NANPA in its Petition.

2. On February 3, 2000, the Commission issued its Order and Notice Directing Filing of Proposed Procedural Schedules in which it directed Staff to file a proposed procedural schedule, advise the Commission regarding the necessity of a technical committee, and advise the Commission of the number, timing, and general locations for public hearings. As stated in its

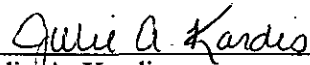
Memorandum, Staff recommends that the Commission establish a technical committee to assist the Commission in this case. In addition, Staff recommends that the Commission order that two local public hearings be held in the 314 NPA, two in the 816 NPA, and one in the 636 NPA. Finally, Staff recommends that the Commission adopt the following procedural schedule to which both NANPA and the Office of the Public Counsel have consented:

Direct Testimony	April 3, 2000 3:00 p.m.
Public Hearings	April 4-April 21, 2000
Rebuttal Testimony	April 24, 2000 3:00 p.m.
Surrebuttal Testimony	May 1, 2000 3:00 p.m.
Prehearing Conference	May 2, 2000 10:00 a.m.
List of Issues Filed by Staff	May 9, 2000 3:00 p.m.
Statement of Positions All Parties	May 26, 2000 3:00 p.m.
Hearing	June 19-22, 2000

WHEREFORE the Staff respectfully requests that the Commission establish a technical committee, order local public hearings, and adopt the procedural schedule consistent with the proposal herein.

Respectfully submitted,

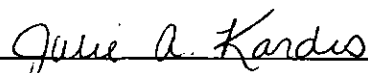
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 14th day of February 2000.

  
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# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. TO-2000-374  
NeuStar, the North American Numbering Plan Administrator

From: Sara Buyak *SB*  
Walt Cecil *WC*  
Telecommunications Department

*Wes Henderson* 2-14-00  
Utility Operations Division/Date

*Wm K Hoos* 2/14/00 *AK* 2-14-00  
General Counsel's Office/Date

Subject: Staff's Response to NeuStar's petition for 314 and 816 NPA number relief

Date: February 14, 2000

On December 17, 1999, NeuStar, the North American Numbering Plan Administrator (NANPA), filed a petition requesting that the Missouri Public Service Commission (Commission) approve the Missouri telecommunications industry's recommended relief plans for the 314 and 816 Numbering Plan Areas (NPAs). NANPA petitions the Commission for approval of a "retroactive" all-services distributed overlay followed by a delayed second all-services distributed overlay of a new NPA for the 314 NPA, and a single all-services distributed overlay for the 816 NPA. NANPA requests a decision by March 1, 2000.

On December 29, 1999, the Office of the Public Counsel (OPC) filed a pleading requesting the Commission to issue notice to concerned parties. OPC questions whether adequate notice has been provided to interested parties and whether NANPA's requested relief plans truly represent an industry consensus. OPC requests the Commission schedule evidentiary hearings and establish a technical committee to evaluate relief proposals, develop alternatives, narrow issues, and provide technical expertise in the implementation of the final relief plans.

OPC recommends that the Commission utilize the process used in Case No. TO-98-212 and Case No. TO-95-289 in the review of NXX exhaustion in Missouri.

On January 10, 2000, Southwestern Bell Telephone (SWBT) filed a response to OPC's pleading. SWBT claims OPC has misrepresented the NPA relief planning process. SWBT states the process was conducted in full compliance with applicable guidelines and that the Commission has the option to conduct such proceedings, as it deems appropriate, involving solicitation of input from the public before selecting a numbering relief plan. SWBT supports having additional proceedings.

On January 5, 2000, the Commission issued an Order and Notice of Petition (Order). The Commission's Order directed notice to all interexchange and local exchange telecommunications companies in Missouri, as well as to the mayor of the City of St. Louis and county commissions of the affected counties in the 314 and 816 NPAs. In addition, the Commission directed notice to newspapers in these areas as well as to members of the General Assembly representing the districts in the 314 and 816 NPAs. The Commission established an intervention deadline of February 4, 2000. The Commission's January 5, 2000 Order directed the Missouri Public Service Commission Staff (Staff) and the OPC to file responses and recommendations regarding the petition by February 11, 2000.

Numerous parties have requested to intervene in this proceeding, including: Ameritech Cellular; AT&T Communications of the Southwest, Inc.; Birch Telecom of Missouri; CyberTel Cellular Telephone Company and CyberTel RSA Limited Partnership d/b/a Ameritech Cellular; Gabriel Communication of Missouri, Inc.; GTE Midwest; the Missouri Independent Telephone Group of local exchange companies (which includes Alma Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company,

Modern Telecommunications Company, MoKan Dial Inc., and Northeast Missouri Rural Telephone Company); Nextlink Missouri, Inc.; Sprint Missouri, Inc.; Sprint Communications Company L.P.; and Sprint Spectrum L.P. d/b/a Sprint PCS.

According to the Commission's Consumer Services Department, as of February 8, 2000, 18 complaints were received regarding the 314 and 816 NPAs Relief Petition. The Telecommunications Department Staff received one inquiry.

This report is divided into several sections. Background information is provided to give some perspective on the latest relief efforts and NANPA's petition for additional relief. This information also attempts to analyze the status of NXX codes and telephone numbers. Conservation measures are discussed, including Federal Communications Commission (FCC) and other states' actions to implement telephone number conservation measures. NPA relief considerations are identified prior to discussing NANPA's relief alternatives. The report concludes with Staff's recommendations.

## **Background**

In Case No. TO-98-212, the projected exhaust dates for the 314 NPA varied depending on the implementation of telephone number conservation measures. Absent any telephone number conservation measures, various parties to the case projected that the 314 NPA would exhaust by 2002 and the 636 NPA by 2009. In contrast, if certain telephone number conservation measures were implemented, another party predicted the 314 NPA would exhaust by 2012 and the 636 NPA by 2045. These anticipated number conservation measures included land line pooling and wireless pooling, which were assumed to begin in the first of quarter of 1999 and the first quarter of 2000, respectively. It was also assumed that rate center consolidation would be implemented although at an unspecified time.

At the conclusion of the split, the 314 NPA held many more NXXs than did the 636 NPA. According to the December 1999 Local Exchange Routing Guide (LERG), 689 NXX codes have been assigned in the 314 NPA. According to NANPA information, there are 2 NXXs currently available for assignment in 314 NPA. The end of the permissive dialing period, scheduled to end on February 26, 2000, is expected to increase the number of available NXX codes by 214 NXXs in the 314 NPA. NANPA is currently assigning NXXs at the rate of 123 codes per year in the 314 NPA. Thus, the remaining NXX codes are expected to last approximately 20 months. The 314 NPA is expected to exhaust during the third quarter of 2000.

The geographic split of the 816 NPA resulted in Kansas City and St. Joseph being contained in the new 816 NPA and the balance of the old NPA became the new 660 NPA. In this split, 369 NXXs were assigned to the 816 NPA and 360 to the new 660 NPA. This split resulted in protecting forty-eight codes so seven-digit dialing would be maintained for interstate calls within the Kansas City metro area. Later, it was determined that unprotecting or allowing duplicated NXXs in the 816 and 913 NPA reserved for cross-MCA, seven-digit dialing (or making ten-digit dialing mandatory) should gain one or two years relief at contemporary growth rates. In the Fall of 1999, ten-digit, cross-NPA dialing was introduced and became mandatory at the end of the intercept period on January 18, 2000. One hundred seventy-eight reserved codes (up from 48) became available for assignment. As of January 20, 2000, according to NANPA, there were 209 NXXs available for assignment and 563 NXXs were assigned to carriers in the 816 NPA. The quantity demanded for those NXXs was estimated at 115 codes per year, although the December 1999 quantity demanded is four codes per month due to the jeopardy allocation. Jeopardy is defined as a condition in which the known or forecasted demand for



NXXs will exceed the supply of NXXs during the planning period for relief. As of this writing, an estimated 20 months remains before NXX exhaust in the 816 NPA.

Based on all of this information determined from the 1999 Central Office Code Utilization Study (COCUS), NANPA concluded that the 314 and 816 NPA's were facing jeopardy. The COCUS uses historical NXX assignment data, the expected exhaust of the NPA, and a competitive growth factor to determine the expected life of the various possible alternative relief plans. Relief planning begins 24 months before the projected exhaust date. NANPA's role is to initiate the industry planning process, suggest relief options, facilitate the industry consensus, and file the relief petition with the state commissions.

As of December 1999, the number of NXX codes assigned in the 314 NPA and 816 NPA are 689 and 563, respectively. In both the 314 and 816 NPAs, NANPA representatives indicate that the primary consumers of NXXs are Competitive Local Exchange Carriers (CLECs). According to the December 1999 LERG, the largest code-holder in both Kansas City and St. Louis is SWBT. The 689 NXX codes in the 314 NPA are capable of being assigned to 6,890,000 telephone numbers. The 563 NXX codes in the 816 NPA are capable of being assigned to 5,630,000 telephone numbers. There are an estimated 3.5 million land line access lines in Missouri. Although the number of wireless telephone numbers in use is unknown, such numbers suggest NXX codes may be in short supply but unused telephone numbers may not be.

### **Conservation Measures**

Number conservation measures should help alleviate the impact of unused telephone numbers. On November 1, 1999, the Commission filed a petition with the FCC requesting authority to implement a variety of telephone number conservation measures:

- Thousand-block pooling trials;
- Establish usage thresholds;

Reclaim unused and reserved NXX codes, and portions of these codes;  
Establish numbering allocation standards;  
Require sequential number assignment;  
Hear and address claims of carriers seeking numbering resources outside of the rationing process;  
Maintain rationing procedures for six months following area relief;  
Require the submission of utilization data from all carriers;  
Implement NXX code sharing; and  
Audit carrier's use of numbering resources.

On February 4, 2000, the Commission requested expedited consideration of the petition. To date, the FCC has not ruled on the Missouri Commission's request to implement various number conservation measures.

According to the Sequential Numbering Assignment Report filed in Case No. TO-99-14, industry members have voluntarily assigned telephone numbers sequentially to prepare for implementation of number conservation measures in the future. Such action is consistent with the directions and definitions in the Industry Numbering Committee Guidelines.

The Rate Center Consolidation Report, filed in Case No. TO-99-14, indicates rate center consolidation can offer some long-term number conservation; however it also indicates rate center consolidation will not significantly delay the next NPA exhaust without severe customer impacts. In its September 30, 1999 Report and Order in Case No. TO-99-14, the Commission ordered the implementation of Option No. 1 for the St. Louis metro area as described in the Rate Center Consolidation Report. As of this writing, the impact of this rate center consolidation remains unknown.

The Report on Number Pooling contained in Case No. TO-99-14 indicates that, at the national level, efforts continue to develop thousand-block number pooling. The report indicates the implementation of number pooling can only be permitted after FCC approval.

## FCC and States Orders

In the Pennsylvania Numbering Order,<sup>1</sup> the FCC specifically declined to delegate to states the task of NXX code allocation or assignment. The FCC indicates that any state ordering NXX code allocation is acting outside its authority.<sup>2</sup> However, the FCC's decision specifically delegates a limited amount of NXX rationing authority to state commissions under certain situations. State commissions and the NXX code administrator may also consider imposing NXX usage thresholds for a carrier to meet before obtaining another NXX in the same rate center.<sup>3</sup> In addition, the FCC concedes to the states authority to perform voluntary pooling trials.<sup>4</sup> Staff maintains a state commission has authority to obtain NXX usage information from those carriers under its regulatory jurisdiction. For example, a state commission may audit a carrier's use of number resources and require the submission of utilization data from all carriers. Based upon the Pennsylvania Numbering Order, a state commission may also order the establishment of usage thresholds and pursue voluntary number pooling experiments.

In the Massachusetts Numbering Order,<sup>5</sup> the FCC granted to the Massachusetts Department of Telecommunications and Energy authority to perform thousand-block pooling trials. However, Massachusetts was ordered to provide adequate time for carriers to implement pooling in their switches and administrative systems<sup>6</sup> and to determine the methods of cost

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<sup>1</sup> FCC 98-224, *In the Matter of Pennsylvania Public Utility Commission's Petition for declaratory ruling and request for expedited action on the July 15, 1997 Order, regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, rel. September 11, 1998 (Pennsylvania Numbering Order).

<sup>2</sup> *Id.* at p. 16, ¶23.

<sup>3</sup> *Id.* at p. 17, ¶24.

<sup>4</sup> *Id.* at p. 18-19, ¶27.

<sup>5</sup> FCC 96-325, *In the Matter of Massachusetts Department of Telecommunications and Energy's Petition for Waiver of Section 52.10 to Implement Various Area Code Conservation Methods in the 508, 617, 781, and 978 Area Codes*, Order, CC Docket No. 96-98, rel. Sept. 15, 1999 (Massachusetts Numbering Order).

<sup>6</sup> *Id.* at p. 8, ¶17.

recovery for the pooling trial.<sup>7</sup> Further, the authority granted is interim in nature.<sup>8</sup> The FCC delegates authority to investigate whether or not NXXs have been placed into service according to industry guidelines.<sup>9</sup> If such NXXs have not been placed into service, NANPA is ordered to abide by the Massachusetts Commission's decision to reclaim the NXX. However, the FCC asks the Commission to allow a code holder to explain why the NXX has not been placed into service.<sup>10</sup> The FCC appears to have been sympathetic to the difficulties faced by new entrants to the industry or for a geographic region and asked the Massachusetts Commission to be mindful of those difficulties before recalling any NXX codes or telephone numbers.

In the Illinois Numbering Order,<sup>11</sup> the Illinois Commerce Commission ordered an all-services overlay and chose to implement number pooling. Illinois chose the all-services overlay because it was deemed to best serve the public interest. The all-services overlay was determined to cause less disruption and confusion than a geographic split. The advantage of an all-services overlay is that it continues to associate an area code with a geographic split. The geographic area that is currently covered by 847 would then have two area codes instead of one. For this reason, the Illinois Commission directed the number administrator to confine the new overlaid code to the 847 geographic area, which currently is a clearly defined area.<sup>12</sup> The Illinois Commission concluded that an all-services overlay best serves the public interest and serves as a back-up plan if number pooling does not succeed to forestall the exhaust.

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<sup>7</sup> *Id.* at pp. 8-9, ¶18.

<sup>8</sup> *Id.* at p. 10, ¶22.

<sup>9</sup> *Id.* at p. 11, ¶23.

<sup>10</sup> *Id.* at p. 11, ¶24.

<sup>11</sup> *In the Matter of Illinois Commerce Commission Petition for Approval of an NPA Relief Plan for the 847 NPA*, Order, Docket No. 97-0211, rel. May 11, 1998 (Illinois Numbering Order).

<sup>12</sup> *Id.* at p. 35.

## **NPA Relief Considerations**

In determining a number relief plan, it is desirable for state commissions to comply with NPA code relief planning and notification guidelines. A copy of the guidelines was attached to SWBT's January 10, 2000 pleading in this docket. In brief, some of the guidelines are:

- The relief options are to last five years beyond the predicted date of exhaust and cover more than one relief activity.
- The living document should reflect changes for NXX codes or other factors. The annual COCUS analysis is used as one of the tools in updating the options.
- The relief plan shall be prepared in accordance with appropriate industry guidelines (i.e, NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.).
- Interested industry parties should become involved in the development of the plan and local regulators are to be aware of the plan and approve.
- The choice of relief methods is a local decision and shall be specified in the plan along with boundaries if a split is chosen.
- The plan recommends that customers who undergo number changes shall not be required to change for a period of 8-10 years.
- The use of protected NXX codes should be eliminated or reduced. Reduction or elimination of protected codes should be accomplished prior to a request for a relief NPA code.
- In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. Severe imbalances shall be avoided.

## **314 NPA Relief Alternatives**

NANPA presented four possible solutions to the exhaust forecasted for the 314 NPA. The solutions were variations of geographic splits and overlays.

**Alternative #1 All-services Distributed Overlay.** This plan implements a new NPA over the existing NPA. Two NPAs would exist in the same geographic space. The expected life of this plan is 6.3 years. Ten-digit dialing would be mandatory, but existing phone numbers would not be changed. Only new lines would be required to use the new NPA.

**Alternative #2 Single Split.** In this plan 314 NPA would be reduced to an existing 557 NXXs for an anticipated life of 2.4 years with the remaining 213 NXXs creating a new NPA with an anticipated life of 16.4 years. This alternative would split a local calling scope and require ten-digit dialing across the MCA.

**Alternative #3 Retroactive Overlay.** In this plan the existing 314 NPA would be overlaid by the existing 636 NPA combining the two areas. The excess capacity of the 636 NPA would be used to supplement the 314 NPA. The estimated life of this plan is 4.4 years. Ten-digit dialing would be mandatory.

**Alternative #4 Single Split.** In this split the NPA is reduced to 276 NXXs, essentially the St. Louis rate center, with an anticipated life of 11.4 years. The remaining 498 NXXs would create a new NPA with an anticipated life of 3.4 years. This proposal also splits a local calling scope and would require ten-digit dialing across the NPA boundaries.

The industry consensus is to combine alternatives #3, a retroactive overlay, and #1, an all-services overlay. The retroactive overlay is implemented first, followed in December 2002 by an all-services-distributed overlay yielding an expected total of 10.2 years relief. According to the industry, the retroactive overlay was suggested because there is "excess capacity" in 636 which will delay the necessity of creating a new NPA, allow the industry time to upgrade the 911 system to handle a fifth NPA, and allow alarm companies the freedom to reprogram their equipment in the 636 and 314 NPAs. To increase the anticipated life of this relief proposal, an all-services-distributed-overlay is required. If implemented after December 2002, then 911 services problems will be avoided. SWBT officials and other industry representatives have indicated the telephone company equipment and Public Safety Answering Points (PSAP) have a capacity of four NPAs. The St. Louis 911 system currently handles all or parts of NPAs 573,

636, 314, and 618 (in Illinois). Regardless of whether an overlay or a geographic split is implemented, the existing 911 telephone company equipment may have difficulties in handling an extra NPA. Also, the upgraded telephone company equipment will necessitate the local PSAPs to upgrade their equipment to allow the PSAP equipment to properly interface with the upgraded telephone company equipment. At this time, it is unclear whether the upgrades to the telephone company equipment and the PSAPs will require new hardware, software, or both.

### **816 NPA Relief Alternatives**

NANPA presented to the industry three possible solutions and industry representatives offered two more proposals for the 816 relief effort.

**Alternative #1 All-services Distributed Overlay.** This plan implements a new NPA over the existing NPA. Two NPAs would exist in the same geographic space. The expected life of this plan is **6.7 years**. Ten-digit dialing would be mandatory but existing phone numbers would not be changed. Only new lines would be required to use the new NPA.

**Alternative #2 Single Split.** In this plan the 816 NPA would be reduced to an existing 660 NXXs and have an anticipated life of **1.1 years** with the remaining 65 NXXs creating a new NPA with an anticipated life of **94 years**. Under this alternative, seven-digit dialing remains possible within an NPA. Ten-digit dialing would be mandatory to cross an NPA boundary.

**Alternative #3 Single Split.** In this plan the 816 NPA would be reduced to an existing 388 NXXs and have an anticipated life of **6.3 years** with the remaining 382 NXXs creating a new NPA with an anticipated life of **7.1 years**. Under this alternative, seven digit dialing remains possible within an NPA but, to cross an NPA boundary, ten-digit dialing would be mandatory.

**Alternative #4 Single Split.** In this plan, the 816 NPA would be reduced to an existing 522 NXXs with an anticipated life of **3.1 years** with the remaining 248 NXXs creating a new

NPA and an anticipated life of 15.4 years. Under this alternative, seven digit dialing remains possible within an NPA but, to cross an NPA boundary, ten-digit dialing would be mandatory.

**Alternative #5 Concentrated Overlay.** In this plan, a new smaller NPA would be established within the existing larger 816 NPA. The concentrated area would consist of 522 NXXs and have an anticipated life of 6.7. The remaining 248 NXXs would have an anticipated life of 2.9 years. Under this alternative, ten-digit dialing would be mandatory.

According to the industry, there are still the same 911 upgrade problems that St. Louis is facing. The Kansas City 911 system is also at its NPA capacity with the following NPAs: 816, 660, 913, and 785 (the last two are in Kansas). An all-services distributed overlay will provide the maximum amount of time to allow for the necessary upgrades to occur.

### **Staff Recommendation**

Staff submits that the FCC has mandated that relief be performed regardless of the position a state commission holds on number conservation. Staff recognizes the State of Missouri has a large surplus of telephone numbers, though it is facing NXX exhaustion. In view of the FCC mandate, Staff suggests the Commission is obligated to perform some kind of relief effort. Number conservation efforts should begin as soon as possible.

Staff recommends the Commission implement all possible number conservation techniques as soon as it is practical to do so. Staff recommends the Commission order the formation of a Technical Committee to do the necessary preparation and study for the implementation of number conservation measures. The FCC has reminded the states to which it has delegated limited number conservation authority that there are theoretical details and financial issues to be decided before the practical matters of number conservation can be attended. If the Commission prepares for these issues in advance, the lead-time to implement



conservation measures can be shortened. In Staff's opinion, implementing all available number conservation measures alone may not avoid the need to implement relief measures. It is unlikely telephone number conservation measures will significantly delay the need for relief, but telephone number conservation measures can substantially lengthen the life of any relief measures ordered.

### **314 NPA Relief**

Staff tentatively proposes the Commission implement either Alternative #1, an all-services distributed overlay, for the 314 NPA or the industry's proposal to first implement a retroactive overlay (Alternative #3) and then the all-services distributed overlay, (Alternative #1). Before Staff makes the final recommendation, Staff would like to collect more information on the 911 issue regarding the introduction of a fifth NPA and receive the public's input at the public hearings.

Limiting relief to an all-services overlay for the 314 NPA could cause less disruption and confusion than implementing NANPA's proposal. For example, callers in the 636 NPA could still place seven-digit local calls within their own exchange. In NPA 314 all local calls will be ten-digit dialed.

Both the all-services overlay and the industry's proposal is preferable to a geographic split alternative. A geographic split offers the advantage of seven-digit local dialing; however, splitting the 314 NPA into separate area codes will require ten-digit dialing for a significant portion of local calls within a local calling scope. Such a dialing arrangement minimizes any advantages of a geographic split. In addition, an overlay approach does not require any customers to change their phone numbers. The expense of changing telephone numbers could be minimized by an overlay approach.

## **816 NPA Relief**

Staff provisionally recommends the Commission adopt the industry proposal for relief in the 816 NPA: an all-services distributed overlay. This overlay would require ten-digit dialing everywhere in the 816 NPA; however, it is already necessary to dial ten digits when calling the 913 NPA region of the MCA. The additional burden placed upon the residents and businesses of dialing ten digits may not be that significant. The alternatives to an all-services distributed overlay have various drawbacks. For instance, performing a concentrated overlay can create imbalanced exhaustion dates for each region. Realigning the 816/660 NPA boundary would require certain customers to change telephone numbers, plus the long term relief may not be that significant.

## **Public Hearings**

Staff recommends that the Commission hold two public hearings in the 314 NPA, two in the 816 NPA, and one in the 636 NPA. These public hearings should be concluded prior to the filing of rebuttal testimony to allow parties an opportunity to consider public response to their initial positions. This schedule will allow the parties to consider public input regarding the relief proposals in the affected areas.

**Service List for  
Case No. TO-2000-374  
February 14, 1999**

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