

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

In the Matter of the North American)
Numbering Plan Administrator's Petition)
for Approval of NPA Relief Plan for the)
314 and 816 Area Codes

Case No. TO-2000-374

**STAFF'S REPLY TO RESPONSES FROM SOUTHWESTERN BELL
TELEPHONE COMPANY AND FROM SPRINT**

COMES NOW the Staff of the Missouri Public Service Commission, pursuant to Rule 4 CSR 240-6.080(16), and for its reply states:

1. On August 24, 2001, the Staff filed a motion which, *inter alia*, requested the Commission to establish pooling trials in the 314 and 816 Number Plan Areas (NPAs).

2. On September 4, 2001, Southwestern Bell Telephone Company (SWBT) filed its response to the Staff's motion. SWBT requests that the Commission deny Staff's motion because, according to SWBT, such trials will result in Missouri consumers bearing the cost of state-sponsored pooling trials while also bearing the costs of national number pooling. SWBT then states that the cost to implement a state number pooling trial at this time will be significant. SWBT states that the costs associated with conversion from the state number pooling trial software to the national pooling software will also be borne by Missouri consumers and these costs must be recovered.

3. On September 5, 2001, Sprint Missouri, Inc. d/b/a filed its response in opposition to the Staff's motion. Sprint states that the proposed trials are unnecessary and will consume the resources of both the Commission Staff and the industry, and that the proposed trials could potentially result in additional costs being passed onto Missouri customers.

4. The Staff disagrees with SWBT's and Sprint's concerns about the costs of state pooling trials.

The Federal Communications Commission has not dealt with cost recovery on national pooling so no one knows how those costs will be handled. The Staff's motion requested the Commission to order the industry to propose how to recover the costs of the pooling trials; the carriers did not address this request in their responses.

During an August 14, 2001, conference call with Technical Implementation Subcommittee representatives, Staff asked what costs would carriers incur for state pooling trials. No carrier provided an amount or described the elements that would be included in cost recovery.

During an August 21, 2001, conference call with NeuStar, Staff was informed that all but one state trial had been transferred to NeuStar as the National Pooling Administrator, and that those state trials, and any future state trials, are being maintained through a smaller version of the national pooling guidelines and procedures.

As to the claim that state pooling should wait for national pooling because consumers would only bear the national costs as opposed to also bearing the state-specific costs, the Staff has been assured by NeuStar that cost recovery for such things as software, whether implemented as a state trial or through the national implementation, will be borne on a regional basis. Even if Missouri does not have pooling in its NPAs, consumers would bear the costs of pooling within the five-state region of Texas, Missouri, Oklahoma, Kansas and Arkansas.

The Staff was also informed by NeuStar that the cost of software conversion will be shared within the five-state region at the time of conversion, and the cost is not related to whether a state pooling trial was in place using outdated software. In addition, many presumed

costs associated with pooling are already being recovered through the local number portability recovery mechanisms.

The Staff does not believe that state pooling trials will unnecessarily consume the resources of the Commission Staff or the industry, because NeuStar has assured Staff that the state pooling trial process in place at this time is the same process as national pooling, just on a smaller scale.

5. SWBT's response also noted that the Staff has previously refrained from recommending that a state pooling trial should be implemented.

6. Several factors have gone into Staff's recommendation to now implement state pooling. The FCC expected to select a National Pooling Administrator in April, 2001; the selection of NeuStar was made in mid-June 2001. The Staff had been informed that the national roll-out would be available in mid-August; the national roll-out still has not been publicly released. In a NANC planning call held on September 6, 2001, the states were informed that the FCC has confirmed that the national roll-out will be released for a comment cycle in mid-September. The Staff has been informed that any state pooling trials will need to be implemented prior to March 2002. The Staff has been informed that any state pooling trials implemented prior to the national roll-out will not be part of the national roll-out schedule but will be converted to national pooling over a weekend prior to the national roll-out. The Staff has received a bid from NeuStar to cover administering state pooling. The bid is attached as **"Highly Confidential"** Appendix A. In the Staff's opinion, NeuStar's bid is for a nominal amount. The Staff has received confirmation from NeuStar that pooling trials can commence in three to four months, i.e., January and February 2002, if the initial implementation meetings are held during the first week of October. Although Staff supports the Technical Implementation

Subcommittee's recommendation to have NeuStar adjust its forecasted exhaust for the 314 NPA, Staff does not believe the adjusted forecast will be received in time to implement state pooling trials before the March 2002 deadline.

WHEREFORE, the Staff requests the Commission to implement number pooling trials in the 314 and 816 NPAs.

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 September 2001.



APPENDIX A
IS
HIGHLY
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IN ITS
ENTIRETY

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