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August 31, 2001

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

**FILED<sup>3</sup>**  
AUG 31 2001 *ms*  
Missouri Public  
Service Commission

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 the Response of the Technical Implementation Subcommittees to Staff's Motion to Establish Pooling Trials in the 314 and 816 NPAs.

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

Very truly yours,

*Anthony K. Conroy* *tm*

Anthony K. Conroy

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
AUG 31 2001

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

**TECHNICAL IMPLEMENTATION SUBCOMMITTEE REPORT  
ON THE EXTENSION TO THE IMPLEMENTATION DATES  
FOR 314 NPA AND 816 NPA RELIEF PLANS**

COMES NOW Southwestern Bell Telephone Company (SWBT), and on behalf of the Technical Implementation Subcommittees for the 314 and 816 NPAs<sup>1</sup>, submits the Technical Implementation Subcommittee Report to the Commission on the Extension to the Implementation Dates for 314 NPA and 816 NPA Relief Plans, which the Commission directed the Technical Implementation Subcommittees to file no later than August 31, 2001.<sup>2</sup> The Technical Implementation Subcommittee Report is attached hereto as Exhibit A.

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<sup>1</sup> The Technical Implementation Subcommittees for the 314 and 816 NPAs consist of the following parties: Southwestern Bell Telephone Company, Southwestern Bell Wireless, LLC, d/b/a Cingular Wireless, Verizon, Verizon Wireless, Sprint Missouri, Inc. d/b/a Sprint, AT&T, Lathrop Telephone Company, ALLTEL Missouri, Inc., Cass County Telephone Company, Spectra Communications Group, LLC, MCI metro Access Transmission Services, LLC (WorldCom) and NuVox Communications of Missouri, Inc. SWBT is authorized to make and is making this filing on behalf of all of these parties, with the exception of Verizon/Verizon Wireless, which does not join in this Report.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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<sup>2</sup> Order Extending the 314 NPA and 816 NPA Relief Plan Implementation Dates, Case No. TO-2000-374, April 17, 2001, at page 3, ordered paragraph 3.

**TECHNICAL IMPLEMENTATION SUBCOMMITTEE REPORT TO THE  
COMMISSION ON THE EXTENSION TO THE IMPLEMENTATION  
DATES FOR 314 NPA AND 816 NPA RELIEF PLANS**

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

1. On April 17, 2001, the Commission issued its Order Extending the 314 NPA and 816 NPA Relief Plan Implementation Dates in this case. In its Order, the Commission extended the implementation dates for the 314 NPA (557 overlay) as follows:

- Permissive dialing date: January 1, 2002
- Mandatory dialing date: May 5, 2002

The Commission also extended the implementation dates for the 816 NPA (975 overlay) as follows:

- Permissive dialing date: May 5, 2002
- Mandatory dialing date: September 8, 2002

The Commission also ordered that the technical implementation subcommittees (subcommittee) for the 314 and 816 NPAs shall file reports no later than August 31, 2001, providing information necessary for the Commission to determine whether relief should be extended again for either of the NPAs.

2. On July 13, 2001, Southwestern Bell Telephone Company (SWBT), Cingular Wireless, Verizon, Verizon Wireless, Sprint Missouri, Inc. d/b/a Sprint, AT&T, Lathrop Telephone Company, ALLTEL Missouri, Inc., Cass County Telephone Company, Spectra Communications Group, LLC, MCImetro Access Transmission Services, LLC (WorldCom) and the Staff of the Missouri Public Service Commission filed a Joint Motion to modify the implementation dates in the Commission's April 17, 2001 Order to

avoid various implementation issues with ordered dates. The Joint Movants proposed the following modified implementation dates:

314 NPA (557 overlay);

- Permissive dialing date: January 12, 2002
- Mandatory dialing date: May 18, 2002

816 NPA (975 overlay):

- Permissive dialing date: May 25, 2002
- Mandatory dialing date: September 14, 2002

3. On August 14, 2001, the majority of the subcommittee companies, along with Staff of the Public Service Commission (Staff), and the Office of Public Counsel (OPC) held a conference call to discuss the possibility of again extending the implementation dates for the 314 and 816 NPAs. The following information was used by the subcommittee when examining the current dates for NPA relief:

- (a) The 314 NPA has 151 NXX codes remaining as of July 2001. Twenty-six NXXs in the 314 NPA have been returned to NeuStar since January 2001.
- (b) Only 6 NXX codes from the 314 NPA have been assigned in the past seven months. NeuStar has been projecting that 10 to 13 codes will be assigned per month and that 314 would exhaust 2Q2002.
- (c) The subcommittee unanimously disagrees with NeuStar's forecast for the 314 NPA. Southwestern Bell, Staff and OPC are urging NeuStar to adjust its forecast for the 314 NPA as recent code assignment has not been at levels previously projected.

- (d) The 816 NPA has 180 codes remaining as of July 2001. Fifty-two NXXs in the 816 NPA have been returned to NeuStar since January 2001.
  - (e) Only 28 NXX codes from the 816 NPA have been assigned in the past seven months. NeuStar projects that the 816 NPA will exhaust 1Q2004.
  - (f) NeuStar has submitted its national number pooling schedule for FCC approval. At this time, it is unknown if there are plans for the FCC to solicit industry comments.
  - (g) National number pooling will commence March 2002. Three NPAs from each region<sup>1</sup> will begin pooling each quarter (starting in March 2002) with the initial concentration in the top 100 MSAs.
4. Based on the information outlined in paragraph 3, the subcommittee makes the following recommendations:
- (a) The Commission should further delay the 314 and 816 NPA relief plans as neither the 314 or 816 NPA requires immediate relief. The subcommittee urges the Commission to refrain from establishing relief dates in either of the NPAs at this time. The subcommittee proposes a second report to the Commission six weeks after the FCC approves the pooling schedule. It is estimated that the FCC will comment on NeuStar's schedule approximately the third week of September. At that time, the subcommittee can make its final recommendation to the Commission after analyzing the pooling schedule. It is possible that number pooling will be implemented in the 314 and 816 NPAs prior to the need to implement the overlay relief plans in the 314 and 816 NPAs.


(b) Therefore, the subcommittee recommends an indefinite delay in both the 314 and 816 NPA overlay relief plans. The Commission should postpone the current relief dates and should not establish revised dates at this time. The subcommittee recommends an additional report be issued no later than six weeks following the release of the national number pooling rollout schedule. At that time, the subcommittee and other parties will be in a better position to recommend a final decision regarding the implementation schedule for the overlay relief plans.

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<sup>1</sup> The regions are the service areas of the previous seven regional bell operating companies.

**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 31st, 2001.

  
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