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July 24, 2000

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By Facsimile and Overnight Courier

Mr. Dale Hardy Roberts  
Secretary and Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 W. High Street, Room 530  
P.O. Box 7854  
Jefferson City, Missouri 65102

**FILED**

JUL 24 2000

*replaces  
fax*

Missouri Public  
Service Commission


Re: Case No. TO-2000-374  
Area Code Relief for 314 and 816 NPAs

Dear Mr. Roberts:

Enclosed for filing are an original, eight copies and one electronic copy in Microsoft Word format of the Statement of Position of NeuStar, Inc., in its role as the North American Numbering Plan Administrator. In addition, we are transmitting a copy of the Statement of Position via electronic mail to the regulatory law judge assigned to this proceeding, Keith Thornburg (kthornbu@mail.state.mo.us). Please date-stamp the enclosed copy as received and return it in the attached self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Kimberly Wheeler  
Counsel for NeuStar, Inc.

Enclosures

STATE OF MISSOURI  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

**FILED**

JUL 24 2000

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

**STATEMENT OF POSITION**

The North American Numbering Plan Administrator NeuStar, Inc. ("NANPA"), in its role as the neutral third party NPA Relief Planner for Missouri under the North American Numbering Plan and pursuant to the March 20, 2000 Order Modifying Procedural Schedule in the above-captioned docket, submits its statement of position addressing each of the issues specified by the staff of the Missouri Public Service Commission ("Commission") in its Proposed List of Issues, Order of Witnesses, and Order of Cross Examination filed with the Commission on July 19, 2000.

**ISSUE:**

- A. What, if any, action should the Commission take regarding number conservation (*i.e.*, number pooling, sequential numbering assignments, etc.) in the following NPAs?
- 1) 314
  - 2) 816

**POSITION:**

- A.1, A.2) NANPA supports the Commission and the industry in their efforts to conserve numbering resources, however, the Federal Communications Commission ("FCC") has stated that conservation methods are not a substitute for area code relief.<sup>1</sup> As such, NANPA has no independent view as to what specific action the Commission should take regarding number conservation in the 314 and 816 NPAs.

**ISSUE:**

- B. What area code relief should the Commission order implemented in the following NPAs:

- 1) 314
- 2) 816

**POSITION:**

- B.1, B.2) In accordance with FCC rules<sup>2</sup> and guidelines developed by the Industry Numbering Committee,<sup>3</sup> NANPA's role is to facilitate the Missouri telecommunications industry to reach consensus to recommend a single relief plan for each of the 314 and 816 NPAs to the Commission. In furtherance of that goal and in accordance with the NPA Relief Guidelines, NANPA, on behalf of the Missouri telecommunications industry, filed a petition with the Commission on December 17, 1999 requesting Commission approval of a "retroactive" all services overlay relief plan for the 314 NPA, (*i.e.*, extending the current 636 NPA to encompass the existing 314 NPA) followed by the implementation of a second overlay of a new NPA, and a single all services overlay relief plan for the 816 NPA. Both relief plans were recommended by the industry

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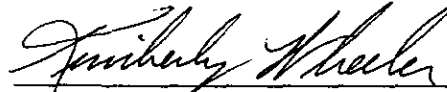
<sup>1</sup> See *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 13 FCC Rcd 19009 (1998).

<sup>2</sup> See 47 C.F.R. §52.13 (1999).

<sup>3</sup> In order to plan for the introduction of new area codes, NANPA and the industry utilized the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016 Nov. 8, 1999) ("NPA Relief Guidelines"). The NPA Relief Guidelines assist NANPA, the industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

through a consensus process. As a neutral third party administrator, NANPA has no independent view regarding the relief plans selected by the Industry.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Lee S. Adams", written over a horizontal line.

Lee S. Adams

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Kimberly D. Wheeler

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Counsel for NeuStar, Inc.

July 24, 2000

## CERTIFICATE OF SERVICE

I, James S. Bucholz, do hereby certify that the foregoing **Statement of Position** was served by first class mail and facsimile, on this 24th day of July, 2000, on the following:

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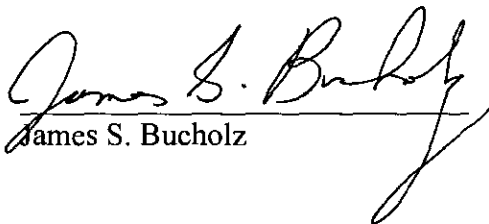
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