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July 24, 2000

FILED

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Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

**Missouri Public
Service Commission**

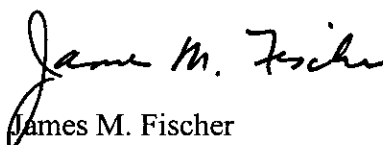
RE: *NPA Relief Plan for the 314 and 816 Area Codes*
Case No. TO-2000-374

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Position Statement of GTE Midwest Incorporated d/b/a Verizon Midwest. A copy of the foregoing Position Statement has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED

JUL 24 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 Codes.)

Case No. TO-2000-374

**POSITION STATEMENT OF GTE MIDWEST INCORPORATED
d/b/a VERIZON MIDWEST**

COMES NOW GTE Midwest Incorporated d/b/a Verizon Midwest ("GTE") and, pursuant to the Commission's Order Modifying Procedural Schedule issued on March 20, 2000, respectfully submits the following Position Statement to the Missouri Public Service Commission ("Commission"):

1. On July 19, 2000, the Commission Staff, on behalf of the parties to this proceeding, filed a Proposed List of Issues, Order of Witnesses, and Order of Cross-examination. This pleading identified two major issues to be addressed by the Commission. The purpose of this pleading is to briefly summarize GTE's position on the identified issues:

A. What, if any, action should the Commission take regarding numbers conservation (*i.e.*, number pooling, sequential number assignments, etc.) in the following NPAs?

With the release of the FCC NRO order, GTE submits that there is little specific action required on the part of the Commission concerning number conservation. The order has defined the timeframe and procedures for reclamation of NXXs and has defined sequential number assignment procedures. GTE would encourage the investigation of rate center consolidation in the 816 NPA where it can be done without impacting customer rate and dialing scopes.

With regard to number pooling, it is recognized that the Commission has recently received approval from the FCC to implement a trial. As GTE pointed out in Mr. Rollins Direct Testimony at 19, GTE supports number pooling where it can be shown to provide a benefit. Also as Mr. Rollins pointed out in his Rebuttal Testimony at 6, the use of pooling in conjunction with the implementation of a retroactive overlay could preclude the necessity of a third area code being required. Therefore, if the Commission desires to implement a pooling trial in advance of the national rollout by the FCC, GTE recommends that the Commission establish a technical industry committee to provide recommendations concerning the deployment of pooling and the associated issues that will need to be addressed. This technical committee should answer the following questions:

1. Will pooling provide sufficient relief of the NPAs in Missouri to justify its deployment as a trial?
2. If the answer to the first question is yes, the committee should develop a proposed deployment schedule and identify any specific technical issues that will need to be addressed.
3. The committee would present its findings to the Commission for review and approval.

To assist the committee, the Commission will need to establish the following:

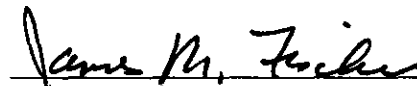
1. Since a trial will require the selection of a Missouri Pooling Administrator, the Commission should provide the committee guidance on how this selection may take place.
2. The Commission will also be required to establish a cost recovery mechanism for the payment of, and reimbursement for, pooling related cost should it be deployed in advance of the national rollout.

B. What area code relief should the Commission order implement in the following NPAs: (314 and 816)?

GTE recommends that regardless of conservation measures implemented, the Commission should expeditiously approve a retroactive overlay for the 314 NPA and an all services overlay for the 816 NPA.

WHEREFORE, GTE Midwest Incorporated respectfully requests the Commission to consider GTE's Position Statement and adopt policies consistent with the recommendations suggested therein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class, postage prepaid, this 24th day of July, 2000, to:

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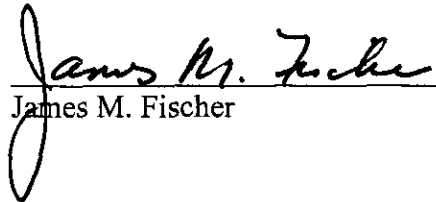
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