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FILED

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July 24, 2000

Missouri Public
Service Commission

VIA FACSIMILE
AND OVERNIGHT DELIVERY

Mr. Keith Thornburg
Regulatory Law Judge
Missouri Public Service Commission
301 West High Street – Fifth Floor
Jefferson City, Missouri 65102

FILED

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Missouri P
Service Commission

RE: TO-2000-374

Dear Judge Thornburg:

Attached with this letter is the Statement of Position of Ameritech CellularTM in the above-referenced docket. I am also this date e-mailing this Statement of Position to you to the e-mail address set forth in the Commission's Order dated March 1, 2000.

Via overnight delivery, I am enclosing an original and nine (9) copies of this Statement. Please file this Statement with the case papers and return the extra enclosed copy with the date of filing stamped thereon directly to the undersigned in the enclosed self-addressed stamped envelope.

Should you have any questions about this filing, please contact me. Thank you for your attention to this matter.

Very truly yours,

Thomas E. Pulliam

Thomas E. Pulliam

TEP\wh
Attachment

cc: Stephanie S. Cassioppi (via regular mail)
Dan Paul (via regular mail)
Counsel of Record (via regular mail)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
JUL 25 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

STATEMENT OF POSITION

COMES NOW CyberTel Cellular Telephone Company, a Missouri partnership, and CyberTel RSA Limited Partnership, a Delaware limited partnership, d/b/a Ameritech CellularTM, ("Ameritech CellularTM") and files herewith its Statement of Position in this proceeding, to-wit:

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

Ameritech CellularTM supports the pursuit of number conservation efforts by this Commission which comply with the guidelines established by the FCC and, with respect to rate center consolidation, sequential numbering assignment and number pooling, are consistent with the recommendations filed by the Technical Committee established in Missouri docket TO-99-14. The Commission should not initiate a thousands-block pooling trial separate from the implementation of number pooling on a national basis.

2) 816

Ameritech CellularTM has filed no testimony concerning number conservation measures in the 816 NPA, and therefore takes no position on this issue.

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

1) 314

It is Ameritech Cellular'sTM position that the Commission should order a retroactive, all-services overlay of the 314 and 636 NPAs and order an all-services overlay of the "recombined" 314 and 636 NPAs with another NPA. Ordering a retroactive, all-services overlay will allow a more efficient use of limited numbering resources by allowing 636 numbers to be allocated within either the 636 or the 314 NPAs, as dictated by demand and need. In addition, a retroactive, all-service overlay will eliminate the problems faced by consumers in the 314 and 636 NPAs of trying to determine whether a particular call can be completed by dialing 7 digits or 10 digits, as all numbers in the recombined 314/636 NPA will require 10 digit dialing to be completed.

Unlike prior area code relief cases, no party is recommending a further geographic split of the 314 NPA. Thus, the Commission should not select this method of area code relief for the 314 NPA.

While number conservation measures may delay the time when an NPA reaches jeopardy status, adoption of conservation measures alone cannot substitute for the implementation, as soon as possible, of a relief plan for the 314 NPA. Number conservation measures are not a substitute for timely area code relief.

2) 816

Ameritech CellularTM has filed no testimony concerning area code relief in the 816 NPA, and therefore takes no position on this issue.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

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Attorneys for Intervenor Ameritech CellularTM

The undersigned hereby certifies that a true and correct copy of the foregoing Statement of Position was sent by first-class U.S. mail, postage prepaid to the following parties on this 24th day of July, 2000:

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