



Commissioners
KELVIN L. SIMMONS
Chair
CONNIE MURRAY
SHEILA LUMPE
STEVE GAW

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

October 10, 2001

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLILIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
2 DANA K. JOYCE
General Counsel

FILED

OCT 10 2001

Missouri Public
Service Commission

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

RE: Case No. TO-2000-374-In the Matter of the North American Numbering Plan Administration's Petition for Approval of NPA Relief Plan for the 314 and 816 Area Codes

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S RESPONSE TO SOUTHWESTERN BELL TELEPHONE COMPANY'S MOTION FOR RECONSIDERATION**.

This filing has been mailed or hand-delivered this date to all counsel of record, and to the Co-chairs and attorney for the North American Portability Management LLC.

Thank you for your attention to this matter.

Sincerely yours,

Wm K Haas

William K. Haas
Deputy General Counsel
(573) 751-7510
(573) 751-9285 (Fax)

WKH:co
Enclosure
cc: Counsel of Record

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

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

Case No. TO-2000-374

**STAFF'S RESPONSE TO SOUTHWESTERN BELL TELEPHONE
COMPANY'S MOTION FOR RECONSIDERATION**

COMES NOW the Staff of the Missouri Public Service Commission, pursuant to 4 CSR 240-2.080 (16), and for its response states:

1. On August 24, 2001, the Staff filed a motion requesting the Commission to order thousands-block number pooling trials in the 314 and 816 Number Plan Areas (NPAs). Based on discussions with NeuStar, the National Pooling Administrator, the Staff proposed starting dates for the pooling trials of January 2, 2002, in the 314 NPA and of February 1, 2002, in the 816 NPA.

2. On September 25, 2001, the Commission issued its Order Directing State Number Pooling Trials. The Order adopted the starting dates proposed by the Staff and scheduled an implementation meeting to be held by NeuStar no later than October 5, 2001.

3. NeuStar conducted the implementation meeting via teleconference on October 4, 2001. Representatives of the telecommunications industry, the Office of the Public Counsel, and the Staff participated in the meeting. Based upon discussions at the meeting, Southwestern Bell Telephone Company, on behalf of itself and certain companies in the telecommunications industry, filed on October 5, 2001, a Motion for Reconsideration of the Commission's September 25, 2001 Order. Specifically, the Motion requests that the Commission push back the number


pooling trial for the 314 NPA until January 22, 2002, and the number pooling trial for the 816 NPA until February 22, 2002. The Motion notes that several of the parties' employees are involved in a state number pooling trial in the 713 NPA in Houston, Texas, on January 1, 2002, and that other parties request additional time because this is the first pooling trial in which they will have participated.

4. In Staff's opinion, the Motion states good cause to push back the implementation dates of the pooling trials. As the Motion notes, number pooling will still occur in the 314 and 816 NPAs prior to the national rollout. However, the Staff does not anticipate any network disruptions if the Motion is denied.

WHEREFORE, the Staff recommends that the Commission grant Southwestern Bell Telephone Company's Motion for Reconsideration.

Respectfully submitted,

DANA K. JOYCE
General Counsel



William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
e-mail: whaas01@mail.state.mo.us

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 10th day of October 2001.

Wm K Haas

Service List for
Case No. TO-2000-374
Revised: September 21, 2001 (SW)

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

James F. Mauze/Thomas E. Pulliam
Ottsen, Mauze, Leggat & Belz, L.C.
Midvale Building
112 South Hanley
St. Louis, MO 63105-3418

James M. Fischer/Larry W. Dority
Attorney at Law
101 West McCarty Street, Suite 215
Jefferson City, MO 65101

Doug Galloway
Sprint Missouri, Inc.
319 Madison Street
P.O. Box 1024
Jefferson City, MO 65102

Paul S. DeFord
Lathrop & Gage
2345 Grand Boulevard, Suite 2800
Kansas City, MO 64108

Peter Mirakian, III/Wendy E. DeBoer
Spencer, Fane, Britt & Browne, LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106

Cheryl Tritt/Lee Adams
Morrison & Foerster, LLP
2000 Pennsylvania Ave., NW Ste. 5500
Washington, D.C. 20006

Craig S. Johnson
Andereck, Evans, Milne, Peace & Baumhoer
301 E. McCarty Street
P.O. Box 1438
Jefferson City, MO 65102

Paul G. Lane/Leo J. Bub/
Anthony Conroy/Mimi B. MacDonald
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101-1976

Linda K. Gardner
Sprint Missouri, Inc.
5454 W. 110th Street, 10th Floor
Overland Park, KS 66211

Kevin K. Zarling
AT&T Communications
919 Congress, Suite 900
Austin, TX 78701

Carl J. Lumley/Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule
130 S. Bemiston, Suite 200
Clayton, MO 63105

Edward J. Cadieux/Carol Keith
Gabriel Communications, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63006

Mark W. Comley
Newman, Comley & Ruth, P.C.
601 Monroe Street, Suite 301
Jefferson City, MO 65101

W. R. England, III
Brydon, Swearngen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456

Kenneth L. Judd
Southwestern Bell Wireless Inc.
13075 Manchester Road, 100N
St. Louis, MO 63131

James Rohfling
Brasil & Rohfling
6390 Lindell Blvd.
St. Louis, MO 63108

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, NJ 07090

Michael O'Connor
NAPM LLC Co-chair
Verizon
1095 Avenue of the Americas, Floor 34
New York, NY 10013

Pamela H. Connell
NAPM LLC Co-chair
AT&T
Promenade I, Room 15E54
1200 Peachtree Street
Atlanta, GA 30309-3579

Don Sciullo
Attorney for NAPM LLC
Berenbaum, Weinshienk, and Eason
370 17th Street, Suite 2600
Denver, CO 80202

Kimberly Wheeler
NeuStar
1120 Vermont Ave., N.W.
Washington, DC 20005