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December 4, 2000

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P. O. Box 360
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RE: Case No. TO-2000-374

FILED²
DEC 4 2000
Missouri Public
Service Commission

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 PROPOSED 314 NPA IMPLEMENTATION RELIEF PLAN**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Wm K Haas

William K. Haas
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WKH:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
DEC 04 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

STAFF'S RESPONSE TO PROPOSED 314 NPA IMPLEMENTATION RELIEF PLAN

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its response states:

1. On November 10, 2000 several parties to Case No. TO-2000-374, including the Staff, met via teleconference to discuss the October 24, 2000 Report and Order issued by the Missouri Public Service Commission ("Commission") regarding the relief of the 314 and 816 NPAs and to prepare the report, required by that Report and Order to be filed on or before November 24, 2000.

2. The companies' representatives considered the Commission's relief plan, determined proposed permissive and mandatory dialing dates, established a proposed dialing plan, and dealt with other matters. The date proposed for Permissive Dialing to begin is June 2, 2001 at 12:01 A.M. central time and for Mandatory Dialing, October 6, 2001 at 12:01 A.M. central time. The earliest proposed date on which duplicated Central Office Codes (NXXs) will

be issued in the new NPA will be December 6, 2001 (i.e., the earliest proposed date that an NXX that already exists in 314 will be issued in the new NPA is on December 6, 2001).

The proposed dialing plan is

- For local calls: Permissive 1 + ten digits or ten digits (choice to be made by the customer's carrier)
- For toll calls: 1 + ten digits.

3. Other matters discussed included such things as the determination of which company would obtain and hold the test code for the industry. Southwestern Bell Telephone Company volunteered to provide a test code for the industry to use when companies are testing their equipment's functionality in the new NPA. The code will be returned to the NANPA at the end of the test period. There was also a discussion regarding the establishment of a technical subcommittee and a consumer education subcommittee. Several parties agreed to participate on those subcommittees but no one agreed to chair the technical committee. The participants agreed that the report due to the Commission would be filed by the NANPA on behalf of the industry on November 22, 2000.

4. Staff has no objection to the proposed Permissive and Mandatory Dialing dates and recommends that the Commission adopt those dates. Staff also finds no objection to the proposed date on which the first duplicated NXX may be issued and recommends that the Commission adopt that date. However, Staff is very concerned with the proposed dialing plan. Staff is concerned that by allowing the carriers to choose whether they will require a ten digit dialing pattern or a permissive 1 + ten digit pattern for local calls, substantial confusion on the part of the public can be created. By allowing the carriers to individually choose which pattern they will implement, consumers may become confused as to which pattern they should use. For

example, neighbors, who use different telecommunications carriers, could have different dialing requirements. Also, if a customer changes from one service provider who requires a ten digit dialing pattern to a provider that requires a 1 + ten dialing pattern for local calls, another opportunity for confusion and complaint may arise. Further, if a 1 + ten digit plan is adopted, it will not be possible to know in advance of receiving one's phone bill whether or not one has inadvertently dialed a toll call. Staff recognizes that there are other large metropolitan areas, in which the representatives to the conference call do business, that may use the 1 + ten digit dialing plan for local calls. However, Staff does not believe this is the most consumer-friendly pattern and would recommend that the Commission order the industry to implement a universal ten digit dialing plan in the 314 and the overlay NPAs.

5. Moreover, previously in this case, the industry recommended a "Dialing Plan" of "10 digit dialing. Does not require 1+ (only for long-distance)." Petition, Exhibit A, page 3.

WHEREFORE, the Staff requests that the Commission adopt the proposed dates for Permissive and Mandating Dialing and for duplicated NXX's, but reject the proposal for optional 1+10 digit local calling.

Respectfully submitted,

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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 4th day of December, 2000.

William K. Haas

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Case No. TO-2000-374

Revised: December 4, 2000 (sw)

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