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## Missouri Public Service Commission

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December 13, 2001

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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**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S REPLY TO NEXTEL'S RESPONSE**.

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,

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

**FILED<sup>2</sup>**  
DEC 13 2001  
Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

DEC 13 2001

Missouri Public  
Service Commission

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

Case No. TO-2000-374

STAFF'S REPLY TO NEXTEL'S RESPONSE

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

1. On November 21, 2001, the Staff filed a motion in which it proposed, consistent with the Federal Communication Commission's proposal for cost allocation for national pooling, that the cost allocation methodology for the Missouri pooling trials should be based upon a pro rata allocation of cost to all telecommunications carriers providing service within the state in proportion to each carrier's interstate, intrastate and international telecommunications revenues; irrespective of whether carriers may or may not be participating in the pooling trial. This methodology is known as the National LNP model because it was developed to allocate cost for local number portability (LNP). The Staff also proposed a deadline of March 22, 2002, for any industry plan to recover the net costs to the industry for the pooling trials.

2. On December 3, 2001, Nextel West Corp. (Nextel), a wireless carrier, filed its response to the Staff's motion. In this response, Nextel proposed that allocation of shared pooling costs should be based upon clearly specified data and that the data should not be NPA specific. Nextel advised the Commission that if the allocation is based upon Missouri specific


revenue data, Nextel (and probably other wireless carriers) will request confidential treatment. With regard to carrier specific pooling costs, Nextel opposes any regulation of wireless carriers that addresses recovery of those costs.

3. First, the Staff intended that shared pooling costs should be allocated based upon the National LNP model, which is based on end user revenue already routinely provided to the National Exchange Carriers Association (NECA). Second, the Staff notes that the Commission issued a Protective Order in this case on September 18, 2001. Third, the Staff does not intend to suggest that wireless carriers, over whose rates the Commission does not have jurisdiction, should file with this Commission a proposal to recover their costs of the pooling trials, only that wireless carriers would be subject to the allocation method ordered by the Commission.

WHEREFORE, the Staff requests that the Commission adopt the National LNP model.

Respectfully submitted,

DANA K. JOYCE  
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\_\_\_\_\_  
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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 13<sup>th</sup> day of December, 2001.

Wm K Hoaa

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**Case No. TO-2000-374**

**Revised: December 13, 2001 (SW)**

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