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July 24, 2000

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

FILED³

JUL 24 2000

Missouri Public
Service Commission

Re: Case No. TO-2000-374

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find the original and 8 copies of the **Office of the Public Counsel's Positions on the Issues**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Very truly yours,

Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Counsel of Record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JUL 24 2000

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

Office Of The Public Counsel's Positions on the Issues

COMES NOW the Office of the Public Counsel and respectfully submits
the its positions on the issues in this case:

1. What, if any action should the Commission take regarding number conservation (ie.,
number pooling, sequential numbering assignments, etc.) in the following NPAs?

- 1) 314: Number conservation in 314 must come quickly and be executed with
near perfection in order for number conservation to significantly postpone NPA
relief. Given that premise, the PSC should concentrate its pooling efforts and
other number conservation efforts in 816 since there is more likelihood those
efforts will have a greater benefit than in 314.

- 2) 816: The PSC should continue its efforts for number conservation in 816,
including reviewing possible rate center consolidations. (Meisenheimer Direct, p 35)
The PSC should consider requesting the ability to switch its number pooling authority
from the FCC from 314/636 to 816 since the benefits for pooling is better in 816 at
this time.

For both NPAs, Public Counsel believes that the PSC should be aggressive in
reclaiming unneeded codes. The PSC should obtain and review data on a regular
basis to fulfill its role that submissions are accurate and codes and blocks are only
assigned as necessary. (Direct, p. 34)

Due to the PSC's order on Friday July 21, 2000, Public Counsel reserves additional
comment on this issue based on its analysis in its response on July 27, 2000.

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

- 1) 314: Number conservation should be used to extend the life of 314 as long as possible, but the extent that it can be extended is uncertain. Public Counsel realizes that number conservation is not a substitute for NPA relief but is an additional tool.

Public Counsel believes that the PSC should order relief through an all service overlay of the existing 314 NPA with a new area code as this is the best relief measure available under the circumstances. (Meisenheimer Direct, p.6, 30-31) When the number of assignable central office codes in 314 falls below 90, the plan should be initiated. (Meisenheimer Direct, p. 30) This indicates a rate of code usage of 10 codes per month, which is reasonable. (Meisenheimer Direct, p. 30).

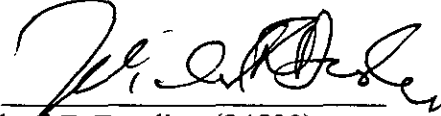
Public Counsel opposes the retroactive overlay as unnecessary and bad public policy. (Meisenheimer Direct, p.28-31)

- 2) 816: Public Counsel recommends that the PSC postpone the final decision on the specific relief plan until the number of assignable codes falls below 100. (Meisenheimer, Direct, p. 31-32). There is a much greater chance of extending the initial life of 816 given the lower demand for codes of 7 per month and code reclamation efforts. (Meisenheimer Direct, p. 32; Rebuttal, p. 12-13; p.9)

Public Counsel is hesitant to recommend a specific relief plan since the need for relief may be 2.4 years away and number conservation methods are in their infancy. Either a geographic split along the Missouri River or an overlay may be reasonable options, but it is too early to tell at this time. The PSC should leave the question open now and revisit the issue within the year to see how conservation measures have worked and review the code usage status. (Meisenheimer Direct, p 7, 31-32)

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been faxed, mailed, or hand-delivered to the following counsel of record on this 24 day of July, 2000:

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