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July 24, 2000

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P. O. Box 360
Jefferson City, MO 65102

FILED²

JUL 24 2000

RE: Case No. TO-2000-374

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S STATEMENT OF POSITION**.

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,

Julie A. Kardis

Julie A. Kardis
Assistant General Counsel
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JAK:sw
Enclosure
cc: Counsel of Record

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

STAFF'S STATEMENT OF POSITION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), pursuant to the Missouri Public Service Commission's March 20, 2000 *Order Modifying Procedural Schedule*, and for its statement of position respectfully states:

A. What, if any, action should the Commission take regarding number conservation in the following NPAs?

1) 314

The Commission should order the establishment of an industry implementation team comprised of representatives of the Office of the Public Counsel, Staff, and all facilities-based service providers to manage the details of thousand-block number pooling as it is deployed and to expedite its implementation.

2) 816

The Commission should order the establishment of an industry implementation team comprised of representatives of the Office of the Public Counsel, Staff, and all facilities-based service providers to manage the details of thousand-block number pooling as it is deployed and to expedite its implementation. The Commission should also order Southwestern Bell Telephone Company to examine and implement rate center consolidation similar to that implemented in the 314 NPA.

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

1) 314

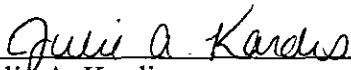
The Commission should order the implementation of an all-services distributed overlay of the 314 NPA.

2) 816

The Commission should order the implementation of an all-services distributed overlay of the 816 NPA.

Respectfully submitted,

DANA K. JOYCE
General Counsel


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Missouri Bar No. 44450

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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 24th day of July 2000.

Julie A. Kardos

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Case No. TO-2000-374
July 24, 2000**

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