

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Holway )  
Telephone Company for Suspension of the ) Case No. TO-2004-0403  
Federal Communications Commission )  
Requirement to Implement Number Portability )

## LOCAL NUMBER PORTABILITY ADDITIONAL IMPLEMENTATION INFORMATION

COMES NOW Holway Telephone Company (“Holway” or “Petitioner”), and in response to questions by the Commission’s Staff, states to the Commission as follows:

1. On February 23, 2004, Holway filed LNP implementation cost data with the Commission. This data was based upon estimates for upgrading Holway's existing Mitel GX 5000 switches.

2. Due to the technical limitations of Holway's existing Mitel GX 5000 switches, Holway has determined that switch replacement is a more economical and practical solution for the company and its customers.

3. Holway continues to evaluate switch replacement options with an emphasis on cost effectiveness and performance. This is an important process that will have both immediate and long-lasting impacts upon Holway and its customers.

4. Suspension is justified under the Act in order to allow Holway to make the best choice regarding switch replacement. Suspension will also delay, and possibly minimize, additional costs to Holway's end user customers.

WHEREFORE, Holway respectfully submits the additional LNP implementation information in response to questions from the Commission's Staff and prays that the Commission will GRANT Holway's Petition for Suspension and Modification of the FCC's LNP requirements.

Respectfully submitted,

By Brian T. McCartney

W.R. England, III                      Mo. #23975  
Brian T. McCartney                  Mo. #47788  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue, P.O. Box 456  
Jefferson City, MO 65102-0456  
[trip@brydonlaw.com](mailto:trip@brydonlaw.com)  
[bmccartney@brydonlaw.com](mailto:bmccartney@brydonlaw.com)  
(573) 635-7166  
(573) 634-7431 (FAX)

Attorneys for Petitioner

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 1<sup>st</sup> day of March, 2004, to the following parties:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Michael F. Dandino  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Brian T. McCartney  
Brian T. McCartney