

Exhibit No.:
Issues: 314 & 816 Area Codes
Witness: Walt Cecil
Sponsoring Party: MO PSC
Type of Exhibit: Surrebuttal Testimony
Case No.: TO-2000-374

FILED²

JUL 12 2000

MISSOURI PUBLIC SERVICE COMMISSION Missouri Public Service Commission

UTILITY OPERATIONS DIVISION

**SURREBUTTAL
TESTIMONY**

OF

WALT CECIL

CASE NO. TO-2000-374

**Jefferson City, Missouri
July 12, 2000**

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1 **Q. Do you agree with Ms. Meisenheimer?**

2 A. No, I have some concerns with her position. Although number pooling should
3 enhance number conservation efforts, the potential benefit that a state commission
4 may expect from an attempted pooling trial may be significantly minimized given
5 the pending federal action on number pooling. Considerable amounts of time and
6 resources will need to be expended by the State to implement such a trial in
7 advance of the federal directive. I am concerned that such efforts will not allow
8 number pooling to be implemented sufficiently ahead of any federal efforts to
9 make the benefits worth the costs. Additionally, I am concerned about the State's
10 ability to establish a trial that will be consistent with the federal plan.

11
12 **Q. Do you think that Missouri could implement number pooling significantly in**
13 **advance of a federal directive to implement number pooling?**

14 A. The answer to this question depends upon when the FCC announces the selection
15 of a national pooling administrator which may be in September 2000, and on
16 whether or not the FCC grants the Commission's petition for delegated authority
17 to conduct such a trial. If authority is granted and if the FCC does choose a
18 pooling administrator around September, it is difficult for me to see how any state
19 commission could initiate a state sponsored number pooling trial which would
20 *commence significantly before the federal plan. Any state pooling trial plan*
21 *would have to address many technical and cost recovery issues. It is possible that*
22 *the resolution of some of those issues may take several months. Such an*
23 *effort may be questionable if ultimately a state initiated pooling trial is*

1 implemented only a few months in advance of the federal rollout.

2
3 **Q. Why are you concerned about the consistency between state and federal**
4 **pooling decisions.**

5 A. The state sponsored pooling trials must conform to the federal mandate when the
6 federal pooling effort commences. There are many issues that have not been
7 decided by the FCC so the states cannot determine with certainty how to proceed
8 with their own trials. Some of the issues that I am concerned with are which data
9 base software management system to use and how to recover costs. The FCC has
10 not yet determined which costs are eligible for recovery so the issue of over- or
11 under-recovery is a real one.

12
13 **Q. Are there any other factors the Commission should consider before making a**
14 **decision about proceeding with a number pooling trial?**

15 A. Number pooling may be costly to implement. The pooling administrator will
16 need to be compensated for its efforts in evaluating and verifying forecasts and
17 requests for NXXs, maintaining the pool of NXXs, and when required, initiating
18 reclamation procedures.

19
20 The Commission may find it difficult to impose a satisfactory cost recovery
21 mechanism. Likely choices for cost recovery would include increasing switched
22 access rates and a special line item on the end user's bill. If the cost of pooling is
23 substantial, it is likely that the State's cost recovery mechanism would have to

1 remain in effect even after the deployment of the federal pooling program to
2 recover all of the costs involved in the State's pooling trial.

3
4 **Q. In summary, what is your recommendation regarding number pooling?**

5 A. Given Missouri's circumstances, number pooling would be appropriate only if
6 deployed with a NPA relief plan. Otherwise, the benefits of a stand-alone state-
7 sponsored number pooling trial may not be worth the cost of such a trial.

8
9 **Q. Does this conclude your surrebuttal testimony at this time?**

10 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter Of The North American)
Numbering Plan Administrator, On Behalf)
Of The Missouri Telecommunications)
Industry, Petition For Approval Of NPA)
Relief Plan For The 314 And 816 Area)
Codes.)

Case No. TO-2000-374

AFFIDAVIT OF WALT CECIL

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Walt Cecil, of lawful age, on his oath states: that he has participated in the preparation of the foregoing written surrebuttal testimony in question and answer form, consisting of 4 pages of surrebuttal testimony to be presented in the above case, that the answers in the attached written surrebuttal testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

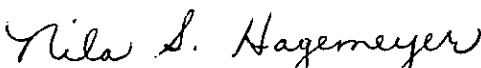


Walt Cecil

Subscribed and sworn to before me this 12th day of July, 2000.

My commission expires

October 14, 2003



Notary Public

**NILA S HAGEMeyer
NOTARY PUBLIC STATE OF MISSOURI
COLE COUNTY
MY COMMISSION EXP. OCT. 14, 2003**