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August 11, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED²
AUG 11 2000
Missouri Public
Service Commission

Re: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight (8) copies of Southwestern Bell Telephone Company's Response to the Office of the Public Counsel's Motion Requesting Commission to Petition FCC for Number Pooling Authority in 816 NPA.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Mimi B. MacDonald /TM

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

AUG 11 2000

Missouri Public
Service Commission

In the Matter of the Petition of the North)
American Numbering Plan Administrator,)
on Behalf of the Missouri Telecommunications) Case No. TO-2000-374
Industry, for Approval of NPA Relief Plan for)
the 314 and 816 Area Codes.)

SOUTHWESTERN BELL TELEPHONE COMPANY'S
RESPONSE TO THE OFFICE OF THE PUBLIC COUNSEL'S MOTION
REQUESTING COMMISSION TO PETITION FCC FOR
NUMBER POOLING AUTHORITY IN 816 NPA

Comes now Southwestern Bell Telephone Company ("SWBT") and, for its Response to the Office of the Public Counsel's Motion Requesting Commission to Petition FCC for Number Pooling Authority in 816 NPA, states as follows:

1. On August 3, 2000, the Office of the Public Counsel filed a Motion Requesting Commission to Petition FCC for Number Pooling Authority in the 816 NPA ("OPC's Motion").

2. In OPC's Motion, OPC states that it: "respectfully requests the Public Service Commission of the State of Missouri to petition the Federal Communications Commission for authority to conduct number pooling in the 816 NPA to the same extent the FCC granted the PSC authority in the 314 NPA on July 20, 2000 in the case styled *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200 (DA 00-1616)."

3. SWBT opposes OPC's Motion for three reasons. First, a state numbering pooling trial in the 816 NPA will not appreciably advance number pooling in the 816 NPA much ahead of the implementation of national number pooling. Conducting a state number pooling trial will require the Commission to select a number-pooling administrator which would likely involve a competitive bid process. As the Commission is aware, working through the competitive bid

process as part of SWBT's 271 process took over six months to complete. In addition, the industry would require time to work through the requirements process and to make the necessary changes required to implement a state number pooling trial. It is likely that by the time the Commission and the industry worked through these issues, the implementation of national number pooling in the 816 NPA would be imminent. Second, states must ultimately follow the national requirements on technical standards and pooling administration; thus, implementation of a state number pooling trial may result in inconsistent requirements on technical standards and pooling administration which would later have to be remedied. Third and finally, a state number pooling trial will generate costs and the Federal Communications Commission has determined that the states must provide for recovery of these costs. If a state number pooling trial is implemented regarding the 816 NPA, SWBT believes the costs associated with the number pooling trial should be recovered through an end-user surcharge. This may result in a surcharge for the state number pooling trial followed by another surcharge once national number pooling is implemented. Thus, SWBT does not believe that a state number pooling trial will provide significant benefits to either telephone subscribers or the telecommunications industry.

4. Although SWBT does not support a state number pooling trial in the 816 NPA, SWBT continues to support implementation of national number pooling and believes that national number pooling will be implemented in the 816 NPA around the same timeframe that a state number pooling trial could be implemented in the 816 NPA.

Wherefore, Southwestern Bell Telephone Company prays the Commission denies the Office of the Public Counsel's Motion Requesting Commission to Petition FCC for Number

Pooling Authority in 816 NPA, together with any additional and further relief the Commission deems just and reasonable.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 11, 2000.

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