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June 22, 2000

By Overnight Courier

Mr. Dale Hardy Roberts
Secretary and Chief Regulatory Law Judge
Missouri Public Service Commission
301 W. High Street, Room 530
P.O. Box 7854
Jefferson City, Missouri 65102

FILED²
JUN 23 2000
Missouri Public
Service Commission

Re: Case No. TO-2000-374
Rebuttal Testimony of Cheryl Dixon

Dear Mr. Roberts:

Enclosed for filing are an original and eight copies of the rebuttal testimony of Cheryl Dixon, on behalf of NeuStar, Inc. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Lee S. Adams
Kimberly Wheeler (D.C. Bar No. 461060)
Counsel for NeuStar, Inc.

Enclosure

cc: Michael Dandino, Office of Public Counsel

STATE OF MISSOURI
BEFORE THE 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)

REBUTTAL TESTIMONY OF CHERYL DIXON
ON BEHALF OF NEUSTAR, INC.

Filed June 23, 2000

1 Q. Please state your name and business address.

2 A. My name is Cheryl Dixon. My business address is:

3 NeuStar, Inc.

4 1800 Sutter Street, Suite 570

5 Concord, CA 94520

6

7 Q. With whom are you employed, and in what capacity?

8 A. I am employed by NeuStar, Inc. ("NeuStar") as Senior Code Administrator
9 for the Central Region of the North American Numbering Plan. I have worked for
10 NeuStar since April of 1999. NeuStar is the North American Numbering Plan
11 Administrator ("NANPA"). The NANPA and other numbering functions were
12 transferred from Lockheed Martin IMS to NeuStar on November 30, 1999. As
13 Senior Code Administrator, I supervise a team of code administrators. The
14 Central Region team is responsible for the assignment and monitoring of central
15 office ("CO") codes in fifteen states. My responsibilities include assigning and
16 reclaiming CO codes, monitoring the status of CO code assignments, declaring
17 and managing numbering plan area ("NPA") jeopardies and working with
18 NANPA relief planners to implement state commission relief orders in accordance
19 with the Central Office (NXX) Code Assignment Guidelines (INC 95-0407-008,
20 April 11, 2000) ("CO Code Assignment Guidelines").

21

22

1 Q. Have you ever appeared as a witness before the Missouri Public Service
2 Commission ("Commission") before ?

3 A. No.
4

5 Q. What is the purpose of your testimony?

6 A. I offer this testimony to update the projected exhaust of the 314 and 816 NPAs as
7 well as the status of central office codes in the NPAs.
8

9 Q. Has the projected exhaust of the 314 and 816 NPAs changed since NANPA filed
10 the Industry's recommended relief plans with the Missouri Public Service
11 Commission?

12 A. Yes. The Industry met to decide upon recommended relief plans for the 314 and
13 816 NPAs on November 9, 1999 and NANPA filed the Industry's recommended
14 relief plans with the Missouri Commission on December 17, 1999. At that time,
15 the 1999 Central Office Code Utilization Survey and NPA Exhaust Analysis (May
16 26, 1999) ("1999 COCUS") projections for CO codes indicated that that 314 and
17 816 NPAs would exhaust during the second quarter of 2000 and the second
18 quarter of 2001, respectively. On January 18, 2000, NANPA released an update
19 of the 1999 COCUS. This update adjusted NPA exhaust projections based upon
20 several factors including the implementation of the new 636 NPA as relief for the
21 314 NPA and individual company requests for large blocks of CO codes. The
22 January 18, 2000 update indicated that the 314 NPA would exhaust during the

1 third quarter of 2001 and the 816 would exhaust during the fourth quarter of 2001.
2 NANPA recently released the 2000 COCUS and NPA Exhaust Analysis (May 23,
3 2000) ("2000 COCUS"). The 2000 COCUS, which incorporates recent CO code
4 activity and new numbering resource demand forecasts submitted by the Industry,
5 extended the projected life of the 816 NPA to the first quarter of 2002. The 314
6 NPA is projected to exhaust during the second quarter of 2001. The 1999
7 COCUS, 1999 COCUS update and 2000 COCUS can be accessed on the NANPA
8 web site at www.nanpa.com.

9
10 Q. Do the new projections set forth in the 2000 COCUS incorporate the rationing of
11 CO codes?

12 A. CO codes in the 816 NPA are not being rationed because it is not in jeopardy.
13 NANPA declares an NPA to be in jeopardy when the forecasted or actual demand
14 for CO codes in an NPA will exceed the known supply during the
15 planning/implementation interval for relief. The 2000 COCUS projections for
16 the 314 NPA incorporate the rationing of CO codes. At the time NANPA
17 assumed CO Code Administration duties for Missouri from Southwestern Bell
18 Telephone ("SWBT") in February of 1999, CO codes in the 314 NPA were being
19 rationed at a rate of eight codes per month. That rate of rationing continued until
20 the 636 NPA was implemented to relieve the 314 NPA in February of 2000. In
21 April of 2000, NANPA again declared the 314 NPA to be in jeopardy. The
22 industry convened by conference call on May 3, 2000 and arrived at final

1 jeopardy procedures through a consensus process. The final procedures allow for
2 the assignment of a maximum of fourteen CO codes per month so that the
3 available CO codes for the 314 NPA will be extended until the second quarter of
4 2001. If fewer than a total of fourteen CO codes are requested during a month,
5 the remainder will be added to the number of CO codes available for the
6 following month.

7
8 Q. Do you have any additions or corrections you would like to make to any previous
9 NANPA filings regarding jeopardy?

10 A. Yes, in NANPA's pre-filed direct testimony of Sandy L. Tokarek filed on May
11 10, 2000, Ms. Tokarek inadvertently stated that the current rationing number for
12 the 314 NPA is eight codes per month. That statement should be modified to
13 reflect that the current rationing amount for the 314 NPA is fourteen codes per
14 month.

15
16 Q. In her pre-filed testimony submitted to the Commission on May 10, 2000 on
17 behalf of the Office of Consumer Advocate, Barbara A. Meisenheimer stated that
18 she estimated that NANPA forecasted the rate of exhaust for the 314 NPA at
19 about 11.6 CO codes per month and about 10.2 CO codes per month for the 816.
20 Is this an accurate estimate of NANPA's forecasts?

21 A. No. As stated previously, the 314 NPA has been in jeopardy, with the exception
22 of two months, since NANPA assumed CO code administration duties for

1 Missouri in February of 1999. Due to rationing, the actual demand for CO codes
2 has been much higher than reflected by the amount of codes assigned each month.
3 That means that NANPA's exhaust projection for the 314 NPA is based upon
4 rationing, not on historical demand for CO codes. The following table sets forth
5 the recent demand for CO codes in the 314 NPA per month compared to the code
6 assignments for each month.

7 **Table 1**

| MONTH | NUMBER OF 314 NPA CO CODES REQUESTED | NUMBER OF 314 NPA CO CODES ASSIGNED |
|----------------|--------------------------------------|-------------------------------------|
| February 1999 | 23 | 8 |
| March 1999 | 19 | 8 |
| April 1999 | 22 | 8 |
| May 1999 | 25 | 8 |
| June 1999 | 26 | 8 |
| July 1999 | 21 | 8 |
| August 1999 | 13 | 8 |
| September 1999 | 14 | 8 |
| October 1999 | 16 | 8 |
| November 1999 | 22 | 8 |
| December 1999 | 17 | 8 |

8

9 The projected exhaust for the 816 NPA set forth in the 2000 COCUS is based
10 upon a CO code demand rate of seven codes per month. The demand rate is
11 calculated using historical and projected demand for CO codes as well as other
12 factors.

13

14 Q. Ms. Meisenheimer also identified 33 codes in the 314 NPA, 16 codes in the 636
15 NPA and 66 codes in the 816 NPA which are unavailable for an unidentified

1 purpose and that between 17 to 33 codes in the 816 NPA should be reclassified.

2 Is this statement accurate?

3 A. No. The following tables, Tables 2-4, set forth the codes unavailable for
4 assignment in each of the 314, 636 and 816 NPAs. The reasons for the
5 unavailability of the codes are listed in the tables. The term "oddball" refers to
6 the N11 codes (*e.g.*, 911, 411) and other industry standard codes which are not
7 assignable. "Test" refer to codes used by the industry for internal tests and are not
8 available for assignment. As the tables indicate, only one code in the 636 and
9 seven codes in the 816 are under investigation. Pursuant to NANPA's ongoing
10 efforts to identify the status of the CO codes labeled "under investigation," on
11 June 13, 2000, NANPA received confirmation from service providers that six
12 codes previously listed an "under investigation" have been disconnected and
13 returned to the pool of available codes. The attached list reflects the return of
14 these six codes. NANPA continues to work with the former Code Administrator
15 for Missouri, SWBT on a monthly basis to determine the status of the eight
16 remaining codes identified as "under investigation." SWBT currently is
17 determining whether the codes may be returned to the pool of available codes.
18 NANPA will contact SWBT during the first five business days of July to
19 determine the disposition of the eight codes.

20
21 As for the statement that between 17 to 33 codes from the 816 NPA can be
22 returned to the pool of available codes, Ms. Meisenheimer may have been

1 referring to the seven codes listed as "under investigation" and the six codes
2 which were returned to NANPA on June 13, 2000. I would need clarification
3 from Ms. Meisenheimer regarding any additional codes she may be referring to
4 and why she believes they can be reclassified.

5 **Table 2**

| | NPA-NXX | Disposition |
|-----|----------------|-------------------------------------|
| 1. | 314-201 | Test |
| 2. | 314-202 | Test |
| 3. | 314-203 | Test |
| 4. | 314-211 | Odd Ball |
| 5. | 314-217 | Test |
| 6. | 314-309 | Test |
| 7. | 314-311 | Odd Ball |
| 8. | 314-314 | Odd Ball |
| 9. | 314-319 | Test |
| 10. | 314-410 | Test |
| 11. | 314-411 | Odd Ball |
| 12. | 314-417 | Test |
| 13. | 314-501 | Test |
| 14. | 314-502 | Test |
| 15. | 314-511 | Odd Ball |
| 16. | 314-557 | Odd Ball |
| 17. | 314-573 | Odd Ball |
| 18. | 314-599 | Test |
| 19. | 314-611 | Odd Ball |
| 20. | 314-618 | Odd Ball |
| 21. | 314-636 | Odd Ball |
| 22. | 314-666 | Special - Emergency Service Network |
| 23. | 314-700 | Odd Ball |
| 24. | 314-711 | Odd Ball |
| 25. | 314-811 | Odd Ball |
| 26. | 314-816 | Test |
| 27. | 314-901 | Test |
| 28. | 314-911 | Odd Ball |
| 29. | 314-950 | Odd Ball |
| 30. | 314-958 | Test |
| 31. | 314-959 | Test |
| 32. | 314-975 | Hold |
| 33. | 314-976 | Odd Ball |

Table 3

| | | |
|-----|---------|---------------------|
| 1. | 636-211 | Odd Ball |
| 2. | 636-311 | Odd Ball |
| 3. | 636-314 | Odd Ball |
| 4. | 636-411 | Odd Ball |
| 5. | 636-415 | Under Investigation |
| 6. | 636-500 | Odd Ball |
| 7. | 636-511 | Odd Ball |
| 8. | 636-611 | Odd Ball |
| 9. | 636-636 | Odd Ball |
| 10. | 636-700 | Odd Ball |
| 11. | 636-711 | Odd Ball |
| 12. | 636-811 | Odd Ball |
| 13. | 636-911 | Odd Ball |
| 14. | 636-950 | Odd Ball |
| 15. | 636-958 | Test |
| 16. | 636-959 | Test |
| 17. | 636-976 | Odd Ball |

Table 4

| | | |
|-----|---------|---------------------------------------|
| 1. | 816-211 | Odd Ball |
| 2. | 816-311 | Odd Ball |
| 3. | 816-315 | Under Investigation |
| 4. | 816-321 | Under Investigation |
| 5. | 816-338 | Under Investigation |
| 6. | 816-339 | Under Investigation |
| 7. | 816-371 | Under Investigation |
| 8. | 816-411 | Odd Ball |
| 9. | 816-511 | Odd Ball |
| 10. | 816-515 | Odd Ball |
| 11. | 816-552 | Test |
| 12. | 816-553 | Test |
| 13. | 816-557 | Test |
| 14. | 816-570 | Special - Maximizer Routing Code |
| 15. | 816-574 | Special - Centralized Business Office |
| 16. | 816-611 | Odd Ball |
| 17. | 816-620 | Returned June 13, 2000 |
| 18. | 816-621 | Returned June 13, 2000 |
| 19. | 816-624 | Returned June 13, 2000 |
| 20. | 816-631 | Returned June 13, 2000 |
| 21. | 816-641 | Returned June 13, 2000 |
| 22. | 816-660 | Hold |
| 23. | 816-700 | Odd Ball |
| 24. | 816-711 | Odd Ball |
| 25. | 816-728 | Returned June 13, 2000 |
| 26. | 816-785 | Reserved 12/99 |
| 27. | 816-811 | Odd Ball |

| | | |
|-----|---------|--|
| 28. | 816-816 | Odd Ball |
| 29. | 816-911 | Odd Ball |
| 30. | 816-913 | Odd Ball |
| 31. | 816-938 | Under Investigation |
| 32. | 816-939 | Under Investigation |
| 33. | 816-940 | Special - Billing Code - Choke Network |
| 34. | 816-950 | Test |
| 35. | 816-951 | Test |
| 36. | 816-952 | Test |
| 37. | 816-953 | Test |
| 38. | 816-954 | Test |
| 39. | 816-955 | Test |
| 40. | 816-957 | Test |
| 41. | 816-958 | Test |
| 42. | 816-959 | Test |
| 43. | 816-961 | Test |
| 44. | 816-970 | Test |
| 45. | 816-971 | Test |
| 46. | 816-972 | Test |
| 47. | 816-973 | Test |
| 48. | 816-974 | Test |
| 49. | 816-975 | Hold |
| 50. | 816-976 | Odd Ball |
| 51. | 816-978 | Test |
| 52. | 816-988 | Test |
| 53. | 816-994 | Test |
| 54. | 816-998 | Test |
| 55. | 816-999 | Test |

1
2

3

4 Q. Ms. Meisenheimer also recommended that the Commission request an update
5 from NANPA regarding the status of its efforts to reclaim unused codes. What is
6 the status of NANPA's reclamation efforts?

7 A. NANPA follows the CO Code Assignment Guidelines to reclaim unused CO
8 codes. Carriers requesting CO code assignments are required to submit a
9 "Confirmation of Code Activation" Form ("Part 4 Form") certifying that the
10 assigned CO code is in service and is being used for the purpose specified in the

1 original application for the CO code assignment. Prior to the expiration of the six
2 month activation period following the assignment of a CO code, NANPA
3 manually reviews its records to determine if the CO code applicant submitted a
4 Part 4 Form. If the carrier has not timely submitted the Part 4 Form prior to the
5 end of the six month period, NANPA sends a letter to the applicant requesting the
6 status of the assigned CO code and informing the applicant that it is required to
7 submit the Part 4 Form or return the CO code to the administrator. If the
8 applicant does not respond and the six month period expires, NANPA sends the
9 applicant a certified letter informing the carrier that the CO code is subject to
10 reclamation and the matter will be turned over to the Industry Numbering
11 Committee ("INC") if the applicant fails to respond to the second letter.
12 Enforcement of the reclamation process is the responsibility of the INC. NANPA
13 has the ability to grant an extension of the Part 4 to a service provider up to 90
14 day past the original effective date of the CO code.

15
16 In accordance with the guidelines, beginning September 1999, the following
17 reclamation related activity has occurred.

1

TABLE 5

| INC MEETING | TOTAL NUMBER OF CODES SUBMITTED FOR RECLAMATION | NUMBER OF MISSOURI CODES SUBMITTED FOR RECLAMATION |
|----------------------------|--|--|
| INC 45 – September 1999 | 4 (failure to submit a Part 4 form) | 0 |
| INC 46 – November 1999 | 4 (failure to submit a Part 4 form) | 0 |
| INC 47 – January 2000 | 29 (failure to submit a Part 4 form) | 0 |
| INC 48 – February 2000 | 52 (failure to submit a Part 4 form) | 0 |
| INC 49 – April 2000 | 35 (failure to submit a Part 4 form) 75 (Previously granted an extension by NANPA) | 0 2 (The codes 314-395 and 417-517 subsequently were returned voluntarily to NANPA by the service providers.) |
| INC 50 – June 2000 | 116 (Previously granted an extension by NANPA – The INC will release information regarding this disposition of the 116 codes soon.) | 0 |

2

3 Q. Does this conclude your testimony?

4 A. Yes it does, thank you.

CERTIFICATE OF SERVICE

I, Joshua P. Zeldis, do hereby certify that the foregoing Motion was served by first class mail, on this 22nd day of June, 2000, on the following:

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