

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

**In the Matter of the Petition of the North American }
Numbering Plan Administrator, on Behalf of the } Case No. T0-2000-374
Missouri Telecommunications Industry, for Approval }
of NPA Relief Plan for the 314 and 816 Area Codes }**

FILED²

MAY 10 2000

**Missouri Public
Service Commission**

DIRECT TESTIMONY

OF

HOKE R. KNOX

May 10, 2000

1 **Q. Please state your name and business address.**

2 A. My name is Hoke R. Knox. I am Senior Manager Regulatory Policy for Sprint
3 Corporation. My business address is 6360 Sprint Parkway, Overland Park,
4 Kansas 66251.

5

6 **Q. Please describe your educational background and work experience.**

7 A. I hold a B.S. in Business Administration from North Carolina Wesleyan College,
8 an A.A.S. in Industrial Management Technology from Pitt Community College,
9 and an A.A.S. in Electronics Technology from Pitt Technical Institute. I have
10 worked for Sprint since October 1969. Prior to my current position, I have held
11 several positions with Sprint in the areas of network switching, traffic staff
12 supervisor-traffic engineering, senior engineer-network planning, product
13 development manager, manager-network planning, manager-architecture &
14 strategic planning. My work experience has been in both the Local and Long
15 Distance divisions of Sprint. In my current position, I have responsibility for
16 developing state and federal regulatory and legislative policy for Sprint's Local
17 Telecommunication Division.

18

19 **Q. What is your experience with respect to numbering issues?**

20 A. I serve as Sprint's alternate member to the North American Numbering Council. I
21 served as Co-chair of the North American Numbering Council's (NANC's) Local
22 Number Portability Administration (LNPA) Architecture Task Force (1996-
23 1997). I also served as Co-chair of the NANC's LNPA Wireless/Wireline Task

1 Force (1997). I represented Sprint as the voting member of the LNP, L.L.C.
2 (1996-1997) in the Mid-West Region. I represented Sprint at the Illinois
3 Commerce Commissions (ICC) Local Number Portability (LNP) Steering
4 Committee (1995-1997), the ICC's LNP SMS Subcommittee (1995-1996), the
5 ICC's LNP Switching Subcommittee (1995-1996), and the ICC's Number
6 Pooling Subcommittee (1996-1997). I also represented Sprint at the USTA's
7 Numbering Planning Subcommittee (1993-1995).

8
9 **Q. Have you previously testified before this Commission?**

10 A. No, I have not.

11
12 **Q. What is the purpose of your testimony in this docket?**

13 A. The purpose of my testimony is to address number conservation issues and NPA
14 relief for the 314 and 816 Area Codes.

15
16 **Q. What is Sprint's position on a retroactive overlay for the 314 Area Code?**

17 A. Sprint can support either the retroactive overlay or the all services overlay for the
18 314 Area Code.

19
20 **Q. What is Sprint's position on an overlay for the 816 Area Code?**

21 A. Sprint supports the all services overlay for the 816 Area Code.

22
23 **Q. What is Sprint's position on Thousand Block Number Pooling?**

1 A. Sprint supports Thousand Block Number Pooling as a tool in the process of
2 number conservation. Number pooling is not a method of Area Code relief but a
3 tool used in number conservation in Local Number Portability (LNP) capable
4 areas. Area code relief plans for ant jeopardy NPA should be in place prior to
5 number pooling implementation.¹ Sprint believes that national number pooling
6 standards should be used for number pooling in any NPA. National number
7 pooling has been identified in FCC 00-104, CC Docket 99-200, Released March
8 31, 2000, and Paragraph 195 as the pooling method allowed under a federal cost
9 recovery mechanism. For new states evaluating number pooling, any number
10 pooling plan should be implemented under the umbrella of the federal cost
11 recovery mechanism² to eliminate having to establish cost recovery at both the
12 state and federal levels.

13

14 **Q. What guidelines should be used for number pooling?**

15 A. The Industry Numbering Committee (INC) has developed Thousand Block
16 Pooling Administration Guidelines that have been approved by the North
17 American Numbering Council and the FCC³ and these guidelines should be used
18 for number pooling.

19

20 **Q. Should the Missouri Public Service Commission (PSC) order Sequential**
21 **Numbering Assignments for carriers operating in Missouri?**
22

¹ FCC 00-104, CC Docket 99-200, Released March 31, 2000, ¶ 170-172.

² Id., ¶ 171 and 195-197

³ Id., ¶ 156 and 183

1 A. Yes, all carriers should be ordered to use sequential numbering assignments to
2 make ready for thousand block number pooling. Sequential numbering
3 assignments should follow the requirements as identified in FCC 00-104⁴.

4
5 **Q. What is Sprint recommendation on reclamation of unused and reserved**
6 **NXXs, and portions of these codes?**

7
8 A. Sprint supports the needs-based approach for both initial and growth NXX codes.
9 Reclamation of unused and reserved NXXs should follow the current CO Code
10 Assignment Guidelines based on national verification standards as identified in
11 FCC 00-104⁵. Sprint does not support the reclamation of portions of unused and
12 reserved NXX codes because the Thousand Block Number Pooling processes will
13 accomplish the reclamation of portions of unused and reserved NXX codes.

14
15 **Q. Should the Missouri PSC establish numbering allocation standards?**

16 A. No, national standards should be used for numbering allocation as established via
17 the INC and North American Numbering Council (NANC) and approved by the
18 FCC. The FCC has added strength to the North American Numbering Plan
19 Administrator's (NANPA's) responsibilities for number allocations as identified
20 in FCC 00-104⁶. The state commissions have been urged to work cooperatively
21 with the NANPA to help ensure that numbering resources are not prematurely
22 assigned⁷.

23

⁴ Id at ¶ 244-245.

⁵ Id at ¶ 91-92

⁶ Id at ¶ 40

1 **Q. Should the Missouri PSC hear and address claims of carriers seeking**
2 **numbering resources outside of the rationing process?**

3
4 A. If the Missouri PSC establishes a rationing process for a jeopardy NPA situation,
5 then the Missouri PSC should hear and address claims of carriers seeking
6 numbering resources outside of the rationing process. No other rationing process
7 should be used except that of an NPA being in jeopardy. If an introduced number
8 conservation process like numbering pooling or NXX code reclamation takes an
9 NPA out of jeopardy, then an existing rationing process should cease until
10 jeopardy is again established by the NANPA.

11
12 **Q. Should the Missouri PSC maintain rationing procedures for six months**
13 **following area code relief?**

14
15 A. Rationing procedures for six months following area code relief are not necessary
16 if numbering conservation procedures like number pooling and numbering
17 allocation standards are in place within the NPA.

18
19 **Q. Should the Missouri PSC require the submission of utilization data from all**
20 **carriers and should the Missouri PSC establish a utilization threshold?**

21
22 A. In FCC 00-104⁸, the FCC is adopting a nationwide utilization threshold for non-
23 pooling carriers beginning January 1, 2001. The nationwide utilization threshold
24 for non-pooling carriers beginning in January 1, 2001 should be the criteria for
25 data reporting by carriers. The FCC also established the frequency of reporting⁹
26 utilization data to be semi-annually on February 1 and August 1 of each year.

⁷ Id at ¶ 94

⁸ Id at ¶ 115

⁹ Id at ¶ 67

1

2 **Q. Should the Missouri PSC audit carrier's use of numbering resources?**

3 A. Sprint does not believe that an audit process for numbering resources is needed
4 based on the processes identified in FCC 00-104, CC Docket 99-200, related to
5 numbering allocation, number reporting, numbering enforcement, the associated
6 assignment guidelines and the delegation of specific numbering responsibilities to
7 the State of Missouri.

8

9 **Q. Should the Missouri PSC address the implementation of NXX code sharing?**

10 A. Sprint understands that NXX code sharing would be used in non-LNP capable
11 areas as a method of number conservation. Because one carrier controls the
12 terminating traffic for the NXX, Sprint believes that NXX code sharing does not
13 meet the competitive neutrality requirements of the federal Telecommunications
14 Act of 1996. Sprint also believes that NXX code sharing is not necessary for
15 wireline carriers because LNP requirements allow for two or more wireline
16 carriers to compete in an area and potentially use a common NXX code. A CLEC
17 that already has a Location Routing Number (LRN) for its switch (within the
18 LATA) can share an existing NXX code with the Incumbent LEC via LNP and
19 number pooling. If the CLEC does not have an LRN for its switch then an initial
20 NXX would be needed for this respective CLEC.

21

22 **Q. Does this conclude your testimony?**

23 A. Yes.

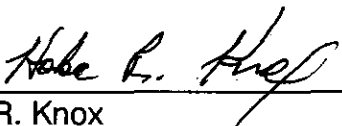
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AFFIDAVIT OF HOKE R. KNOX


STATE OF KANSAS)
)
COUNTY OF JOHNSON) ss:

Hoke R. Knox, of lawful age, on his oath states: That he has participated in the preparation of the attached direct testimony in question and answer form, consisting of 6 pages plus schedules, to be presented in the above case; that the answers in the attached rebuttal 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.



Hoke R. Knox

Subscribed and sworn to before me this 9th day of May, 2000.



Notary Public

My Appointment Expires: 2/18/2001

