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July 27, 2000

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FILED<sup>2</sup>

JUL 27 2000

RE: Case No. TO-2000-374

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S SUPPLEMENTAL STATEMENT OF POSITION**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Julie A. Kardis*

Julie A. Kardis  
Assistant General Counsel  
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JAK:sw  
Enclosure  
cc: Counsel of Record

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

**FILED<sup>2</sup>**

JUL 27 2000

Missouri Public  
Service Commission

Case No. TO-2000-374

In the Matter of the Petition of the North )  
American Numbering Plan Administrator, )  
on Behalf of the Missouri )  
Telecommunications Industry, for )  
Approval of NPA Relief Plan for the 314 )  
and 816 Area Codes. )

**STAFF'S SUPPLEMENTAL STATEMENT OF POSITION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Supplemental Statement of Position respectfully states:

1. On July 21, 2000, the Missouri Public Service Commission (Commission) issued a Notice and Order Directing Responses and Supplemental Position Statements (Notice and Order). In its Notice and Order, the Commission directs all interested parties to file position statements, no later than July 27, 2000, addressing the Commission's delegated authority to adopt numbering resource optimization strategies pursuant to the Federal Communications Commission's (FCC) July 20, 2000 Order (Order), CC Docket No. 96-98, DA 00-1616.

2. By its Order, the FCC grants the Commission the authority to implement the following numbering resource optimization strategies in the 314 NPA:

- (1) Institute a thousands-block number pooling trial,
- (2) Hear and address claims from carriers seeking central office or NXX codes outside the rationing process,
- (3) Audit carriers' use of numbering resources,
- (4) Implement NXX code sharing, and
- (5) Maintain rationing procedures for six months following implementation of area code relief.

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Staff maintains that the above-enumerated strategies for which the Commission has been granted authority, implemented either individually or collectively, will not prevent exhaust of the 314 NPA without the concurrent implementation of area code relief.

3. By its Order, the FCC also grants the Commission the authority to implement the following numbering resource optimization strategies in the 816 NPA:

- (1) Hear and address claims from carriers seeking central office or NXX codes outside the rationing process,
- (2) Audit carriers' use of numbering resources,
- (3) Implement NXX code sharing, and
- (4) Maintain rationing procedures for six months following implementation of area code relief.

Staff notes that while the FCC granted the Commission authority to institute a thousands-block number pooling trial in the 314 NPA, the FCC did not grant this authority in the 816 NPA. As in the 314 NPA, Staff maintains that the above-enumerated strategies for which the Commission has been granted authority, implemented either individually or collectively, will not prevent exhaust of the 816 NPA without the concurrent implementation of area code relief.

Respectfully submitted,

DANA K. JOYCE  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 27th day of July 2000.

Julie A. Kardis

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Case No. TO-2000-374  
July 27, 2000**

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