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July 26, 2000

VIA OVERNIGHT DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street – Fifth Floor
Jefferson City, Missouri 65102

RE: TO-2000-374

FILED²
JUL 27 2000
Missouri Public
Service Commission

Dear Judge Roberts:

Enclosed please find an original and nine (9) copies of the Supplemental Statement of Position filed by Verizon Wireless. Please file this Supplemental Statement in your usual manner and return the extra enclosed copy with the date of filing stamped thereon directly to the undersigned in the enclosed self-addressed stamped envelope at your first opportunity.

Should you have any questions with respect to this filing, please contact me. Thank you for your attention to and assistance with this matter.

Very truly yours,

Thomas E. Pulliam

Thomas E. Pulliam

TEP\wh
Attachment

cc: Michael McDermott (via regular mail)
Anne Hoskins, Esq. (via regular mail)
Counsel of Record (via regular mail)

03100\B60

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUL 27 2000

Missouri Public
Service Commission

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)

Case No. TO-2000-374

SUPPLEMENTAL STATEMENT OF POSITION

COMES NOW Cellco Partnership and Cybertel Cellular Telephone Company d/b/a Verizon Wireless¹ files herewith its Supplemental Statement of Position in this proceeding, to-wit:

Verizon Wireless supports the pursuit of number conservation efforts by the Missouri Public Service Commission ("Commission") consistent with the authority recently granted to the Commission by the Federal Communications Commission ("FCC"), in conformity with all guidelines established by the FCC. However, as stated by the FCC in its Order granting certain authority to the Commission,

[W]e require that the state commissions must take all necessary steps to prepare an NPA relief plan that may be adopted by the state commission when numbering resources in the NPA are in imminent danger of being exhausted. ... Carriers should never be in the position of being unable to provide service to prospective customers because that carrier does not have access to numbering resources.²

Since the 314 NPA is in jeopardy status, and NXX codes are now being rationed, the Commission must adopt and implement a relief plan in this proceeding and not rely solely on the unknown benefits of number conservation efforts to provide relief in the 314 NPA. Wireless

¹ On July 10, 2000, the Ameritech Cellular properties (consisting of Cybertel Cellular Telephone Company and Cybertel RSA Cellular Limited Partnership) were merged into Verizon Wireless.

² Numbering Resource Optimization, order, CC docket No. 99-200, July 20, 2000, ¶ 17.

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carriers, including Verizon Wireless, will not be able to obtain numbers from a thousand block number pool until after they gain local number portability capability (November, 2002). Consequently, the Commission must ensure that there is an ample supply of full NXX codes to meet the numbering demands of wireless and other non-LNP capable service providers. The most effective and efficient way to do so is to order implementation of a retroactive overlay for the 314 NPA.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

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CERTIFICATE OF SERVICE: Case No. TO-2000-374

The undersigned hereby certifies that a true and correct copy of the foregoing Supplemental Statement of Position was sent by first-class U.S. mail, postage prepaid to the following parties on this 26th day of July, 2000:

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