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July 27, 2000

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re: Case Nos. TO-2000-374

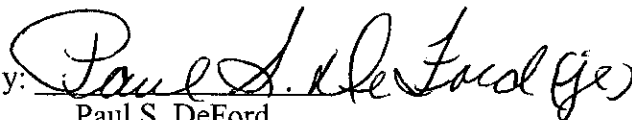
Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Supplemental Statement of Position in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

By: 
Paul S. DeFord

Attachment

cc: All Parties of Record

FILED²

JUL 27 2000

Missouri Public
Service Commission

FILED²

JUL 27 2000

Missouri Public
Service Commission

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

In the Matter of the Petition of the)
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 POSITION STATEMENT

COMES NOW, AT&T Communications of the Southwest, Inc. ("AT&T") and for its supplemental position statement states as follows:

AT&T appreciates the opportunity to respond in light of the Federal Communications Commission's ("FCC") July 20, 2000 order In the Matter of Numbering Resource Optimization, CC Docket No. 99-20 and No. 96-98 ("NRO"). The instant proceeding is certainly affected by the FCC's NRO Order.

The FCC grant of additional delegated authority to implement numbering resource optimization strategies to the Commission includes:

- ☐ A conditional grant of authority to institute thousands-block number pooling;
- ☐ A conditional grant of authority to maintain rationing procedures for six months following implementation of area code relief;
- ☐ A conditional grant of authority to hear and address claims of carriers seeking numbering resources outside of the rationing process;
- ☐ A conditional grant of authority to implement NXX code sharing; and,

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- A conditional grant of authority to conduct audits of carriers' use of numbering resources.¹
- A strong encouragement to proceed expeditiously to consolidate rate centers.²

Institute Thousands-Block Number Pooling

In granting the Commission authority to begin thousands-block (1K) number pooling, the FCC ordered conformance with the "national framework" as ordered in its March 17, 2000 NRO Order.³ that numbers are made equally available in a timely and efficient and non-discriminatory manner which does not substitute for area code relief⁴, and applies currently to only the 314 area code and its successors.⁵ Since the 314 area code is the only area code thus granted 1K number pooling in Missouri, AT&T sees a benefit to the implementation of the industry-recommended "retroactive overlay" between the 314 and 636 area codes in Saint Louis. The historical success of such an overlay in Dallas and Houston proves the technical and consumer effectiveness of this alternative. By implementing this method of overlay, based on the FCC grant of authority, the Commission can effectively extend the reach of number pooling to a larger geography that includes the current 636 area, which not many months ago was also a part of 314. AT&T encourages the adoption of the retroactive overlay proposal and the implementation of number

¹ FCC NRO Order at paragraph 2.

² Id at paragraph 59.

³ Id at paragraph 6.

⁴ Id at paragraphs 10-11.

pooling in the 314 area code, as provided by the FCC's recent order.

Maintain Rationing Procedures for Six Months Following Area Code Relief

In granting the Commission authority to maintain rationing procedures six months beyond area code relief, the FCC provides a transition mechanism into the relief structure.⁶ In doing so, AT&T encourages a well-justified assessment of the advantages of this approach. While some constraints may be advisable going into the relief setting, AT&T believes that many provisions in place today will limit the consumption of numbering resources which may have constituted rationale for requesting such an extension of rationing procedures. AT&T is not aware of any proposals at this time that would impact the 314 and 816 area code relief proceedings.

Hearing and Addressing Claims of Carriers Seeking Numbering Resources Outside of the Rationing Process

In granting the Commission authority to hear and address extraordinary numbering resource claims outside the rationing process, the FCC states that these should be for an, "extraordinary need for numbering resources in an NPA subject to a rationing plan", and may involve the procurement of confidential carrier information that should be handled confidentially.⁷ AT&T believes the Commission should afford an environment that does not preclude a carrier from providing service for lack of a numbering footprint. To the extent that

(Continued from previous page) _____

⁵ Id at paragraph 35.

⁶ Id at paragraphs 62-63.

⁷ Id at paragraphs 53-54.

such procedures can be developed to allow for such a hearing in a non-discriminatory and efficient manner, AT&T supports this effort and would appreciate an opportunity to review any such procedure before it is ordered in Missouri. AT&T does not believe there is such a demand for this process that it should delay the adjudication of the instant docket.

NXX Code Sharing

In granting the Commission authority to conduct studies and possible trials of NXX Code Sharing, the FCC allows that such trials may be undertaken if commissions, "find that NXX code sharing is technically feasible and economically viable"⁸. AT&T offers that there has thus far been little evidence that an NXX Code Sharing strategy between pooling-capable carriers and non-pooling-capable carriers can be found to meet the FCC standard just stated. While study of such an alternative may produce an option that has promise, the Commission would be well advised not to establish implementation dates for number pooling, area code relief, or rate center consolidation that rely on NXX Code Sharing as a number conservation alternative.

Conducting Audits of Carriers Use of Numbering Resources

In granting the Commission authority to conduct carrier-use audits, the FCC has allowed a temporary audit option to be superceded by a further order on this topic.⁹ AT&T believes that were evidence presents itself, such an audit is a prudent activity for the Commission to undertake. AT&T does not see such an audit as effecting the ordering of area code relief and number conservation efforts in the 314 and 816 area codes.

⁸ Id at paragraph 61.

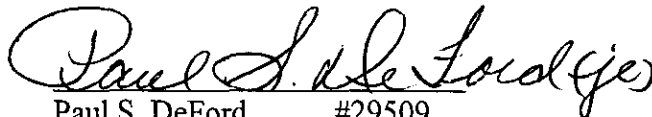
⁹ Id at paragraph 60.

Rate Center Consolidation

In encouraging the Commission to expeditiously consolidate rate centers, the FCC maintains its consistent push for the second of a two-prong number conservation strategy that includes both rate center consolidation ("RCC") and number pooling. The maximum benefit of number conservation can only currently be achieved when both of these strategies are implemented. AT&T concurs with this FCC admonition and believes its deployment within competitive Local Number Portability ("LNP") settings is most valuable to the conservation of numbering resources in Missouri.

Respectfully submitted,

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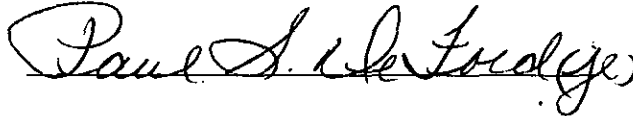
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CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TO-2000-374 was served upon the parties identified on the following service list on this 27th day of July, 2000 by either hand delivery or placing same in a postage paid envelope and depositing in the U.S. Mail.



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