

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.
ATTORNEYS AT LAW
THE MIDVALE BUILDING
112 SOUTH HANLEY
ST. LOUIS, MISSOURI 63105-3418
(314) 726-2800

THOMAS E. PULLIAM

FACSIMILE
(314) 863-3821

September 6, 2001

VIA HAND DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Records Department – 1st Floor
200 Madison Street
Jefferson City, Missouri 65102

FILED³

SEP 7 2001

Missouri Public
Service Commission

RE: Case No. TO -2000-374

Dear Mr. Roberts:

Enclosed please find an original and nine (9) copies of the Comments of Verizon Wireless to the Technical Implementation Subcommittee Report on the Extension to the Implementation Dates for 314 NPA and 816 NPA Relief Plans. Please file these Comments 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 earliest convenience.

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

cc: Counsel of Record (w/enclosure)
Anne E. Hoskins, Esq. (w/enclosure)

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

SEP 7 2001

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

**COMMENTS OF VERIZON WIRELESS TO
TECHNICAL IMPLEMENTATION SUBCOMMITTEE REPORT
ON THE EXTENSION TO THE IMPLEMENTATION DATES
FOR 314 NPA AND 816 NPA RELIEF PLANS**

COMES NOW Verizon Wireless, and hereby submits its comments to the the Technical Implementation Subcommittee Report ("Report") filed in this docket on August 31, 2001. Verizon Wireless does not agree with the conclusion in the Report that 314 NPA relief implementation should be delayed "indefinitely." Consequently, Verizon Wireless was not a signatory to the Report.

On August 3, 2001, Verizon Wireless filed comments to the motion of the Office of the Public Counsel to further postpone implementation dates for the 314 NPA and 816 NPA relief plans. In its comments, Verizon Wireless advocated that the previously adopted 314 NPA relief plan continue to be implemented as ordered on a "back-up" basis so that numbering resources can be assigned when needed by carriers to meet customer demand. Under such a back-up plan, carriers would provision their networks for permissive ten-digit dialing and overlay implementation, but customers would not be impacted until final implementation is triggered. By requiring such "back-up" implementation, the Commission can ensure that relief is available when necessary to meet the legitimate numbering needs of carriers, while not disrupting customers prematurely. Moreover, at this time, there is insufficient information to support an

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indefinite delay in implementation. The Commission should request that Neustar update its forecast of demand for NXX codes in the 314 NPA, and not act upon any proposal to delay relief implementation until such data is evaluated.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: *Thomas E. Pulliam*

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Phone: (314) 726-2800

Fax: (314) 863-3821

E-Mail: jfmauze@email.msn.com

Attorneys for Verizon Wireless

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Comments was sent by first-class U.S. mail, postage prepaid to the following parties on this 6th day of September, 2001:

Paul G. Lane/Leo J. Bub
Anthony K. Conroy/Mimi B. MacDonald
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101

Lee S. Adams/Cheryl Twitt
Kimberly Wheeler
Morrison & Foerster LLP
2000 Pennsylvania Ave., Ste. 5500
Washington, D.C. 20006

Carl J. Lumley/Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule, P.C.
130 S. Bemiston, Suite 200
St. Louis, MO 63105

Peter Mirakian, III/Wendy DeBoer
Spencer, Fane, Britt & Browne, LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106-2140

Paul S. DeFord
Lathrop & Gage, L.C.
2345 Grand Boulevard, Suite 2500
Kansas City, MO 64108

W.R. England, III
Brydon, Swearngen & England, P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102

Mark W. Comley
Newman, Comley & Ruth, P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537

Michael F. Dandino
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

William K. Haas
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Craig S. Johnson
Andereck, Evans, Milne, Peace
& Johnson, L.L.C.
305 East McCarty Street-3rd Floor
P.O. Box 1438
Jefferson City, MO 65102

Edward J. Cadieux/Carol Keith
Gabriel Communications, Inc.
16090 Swingley Ridge Rd., Suite 500
Chesterfield, MO 63006

Lisa Creighton Hendricks
Sprint Corporation
5454 West 110th Street
Overland Park, KS 66211

Kevin Zarling
AT&T Communications of the
Southwest, Inc.
919 Congress, Suite 900
Austin, TX 78701

James M. Fischer/Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

Robert Vitanza
Cingular Wireless
17330 Preston Road, #100A
Dallas, Texas 75252

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, New Jersey 07090

Thomas E. Rothfelder
