

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

In the Matter of the Investigation into the)	
Exhaustion of Telephone Numbers in the 417, 816)	<u>CASE NO. TO-96-1</u>
and New 314 Numbering Plan Areas.)	

Concurring Opinion of Commissioners M. Dianne Drainer and Harold Crumpton

When the Commission considered the issue of telephone NXX exhaustion for the 314 area in Case No. TO-95-289, the NPA relief coordinator and approximately seventy percent of the affected telephone companies suggested an NPA overlay solution.

After a series of public hearings, the Commission chose the NPA split. At that time, the Commission was advised the NPA split solution would last eight years. In light of the new competitive environment, that conclusion is no longer valid.

Missouri has approximately three million telephone customers. Serving that three million customers are 31.68 million telephone numbers. With the instant NPA split, we are adding another 7.92 million for a total of 39.6 million telephone numbers to satisfy the needs of three million customers. What an extravagant waste. Of that 39.6 million, we suspect that less than twenty percent are actually being used. Obviously, Missouri citizens are not creating this demand. The large telephone companies are driving this demand, and may inadvertently create a speculative market in NXXs. Eventually, the telecommunications industry may market NXXs.

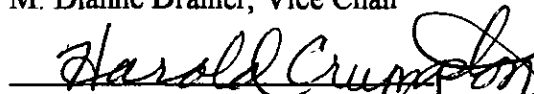
In the future the Commission will expect the technical committee to look at the overlay solution originally recommended by the NPA relief coordinator in TO-95-289 as the best long run solution. In addition, we expect the technical committee to look for a Commission role in the awarding of NXXs. In our opinion, each newly issued NXX should meet a public interest standard.

While ten (10) digit dialing is onerous to some, it may be a dialing method whose time has come. Since NXXs are valuable assets, the Missouri PSC should decide whether or when to approve new NXX assignments.

Respectfully submitted,



M. Dianne Drainer, Vice Chair



Harold Crumpton, Commissioner

Dated at Jefferson City, Missouri, on
this 15th day of April, 1997.