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VIA FACSIMILE

October 7, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Investigation into the Provision of COS
Case No. TW-97-333

FILED
OCT 08 1997
MISSOURI
PUBLIC SERVICE COMMISSION

Dear Mr. Wright:

I am writing to notify the Commission that the Federal Communications Commission (FCC) has imposed a conservation plan limiting the allocation of the remaining 800/888 toll free numbers. The FCC imposed this plan due to an unexpected increase in the utilization of these numbers and its concern that they will be exhausted prior to the planned April 1998 implementation of the 877 numbers. Under this plan, Southwestern Bell Telephone Company has been limited to reserving up to 250 number per week for its entire five state region.

For your information we are attaching a copy of the letter that was faxed to us from the FCC. I apologize for the poor copy quality.

We would appreciate your bringing this matter to the Commission's attention. Please call me with any questions or if further information is needed.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Leo J. Bub".

Leo J. Bub

Attachment

cc: All Attornies of Record

000.000

SEP.29.1997 5:18PM

FCC OCB NSD

82:0T 26.00 035

NO.959 P.2/5



Federal Communications Commission
Washington, D.C. 20554

September 29, 1997

FILED
OCT 08 1997
MISSOURI
PUBLIC SERVICE COMMISSION

Mr. Michael Wade
President
Database Service Management, Inc.
6 Corporate Place
Room PA-1F286
Placatway, NJ 08854-4157

Dear Mr. Wade:

The Ordering and Billing Form's ("OBF") SMS Number Administration Committee ("SNAC") has requested that the Federal Communications Commission ("FCC") impose a conservation plan limiting the allocation of the remaining 800/888 toll free numbering resource. SNAC is sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS").

As you know, the date planned for implementation of the 877 toll free numbering resource is April 4, 1998. SNAC and ATIS submitted data indicating that exhaustion of the 800/888 resource prior to that date is likely unless a conservation plan is imposed. Specifically, calculations using data through August 31, 1997 show that exhaustion will occur in early April 1998 if the average monthly number utilization does not increase. Monthly utilization, however, increased significantly in August 1997 from previous months. SNAC and ATIS anticipate that future increases in monthly utilization will cause the remaining 800/888 resource to exhaust prior to the planned April 1998 implementation of 877.

SNAC submitted a proposed plan for conserving the 800/888 numbering resource. Under this plan, the quantity of toll free numbers a Responsible Organization ("RespOrg") may reserve each week depends upon the quantity of the RespOrg's working toll free numbers on August 23, 1997. Specifically, under the SNAC plan, a RespOrg that had fewer than 1,000 numbers in working status on August 23 may reserve up to 200 toll free numbers each week; a RespOrg that had between 1,000 and 30,000 numbers may reserve up to 250 numbers per week; and a RespOrg that had more than 30,000 numbers in working status on August 23 may reserve each week up to 0.95 percent of the quantity of numbers it had in working status on August 23. SNAC also requests that the Commission impose a moratorium on the certification of new RespOrgs during the period that the conservation plan is in effect. SNAC indicates that all of the RespOrgs had an opportunity to participate in the development of this plan and that all participating RespOrgs support the proposed plan.

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Mr. Michael Wade

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We have examined the data submitted by SNAC and agree that imposition of a number conservation plan is necessary to ensure that the 800/888 toll free numbering resource is not exhausted prior to implementation of the 877 code. We also agree that the plan proposed by SNAC appears adequate to achieve this objective, assuming that the net quantity of numbers removed from the spare number pool does not exceed 89,000 per week. For these reasons, and in light of the fact that SNAC has stated that the industry reached a consensus on the proposed plan, we will impose the conservation plan suggested by SNAC.

SNAC also represents that it intends to monitor the impact of the plan through conference calls every Tuesday and to address any problems that may arise. We will also require Database Service Management, Inc. ("DSMI"), the toll free number database administrator, to submit reports on a weekly basis indicating the quantities of numbers still available in the pool. If the quantity of numbers available for reservation decreases more rapidly than SNAC anticipated (a rate exceeding 89,000 numbers per week), we will implement a stricter plan. Specifically, if, during a four week period, the net quantity of numbers taken out of the spare pool exceeds on average 89,000 per week, we will ask DSMI to reduce each category of RespOrg's allocation by the percentage necessary to ensure that the toll free number resource is available until 877 is deployed. In light of this contingency, we would encourage the industry, through SNAC, to develop a consensus proposal in the event more restrictive conservation measures are needed.

Finally, SNAC indicates that it is considering a plan to give each RespOrg a credit for the unused portion of its weekly allocation on the conservation plan. We believe such a plan could be beneficial, because it would minimize any incentive to reserve numbers unnecessarily. We would, however, encourage SNAC to develop a proposal that would limit the amount of numbers that could be "banked" from week to week.

We therefore direct DSMI to limit the quantity of 800 or 888 numbers a Responsible Organization ("RespOrg") may reserve per week as follows:

1. For purposes of this conservation plan, "working status" refers to a toll free number that has been loaded in the Service Control Points and is being utilized to complete toll free service calls.
2. A RespOrg with fewer than 1,000 numbers in working status as of August 23, 1997 may reserve up to 200 numbers each week.

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3. A RespOrg with between 1,000 and 30,000 numbers in working status as of August 23, 1997 may reserve up to 250 numbers each week.

4. A RespOrg with more than 30,000 numbers in working status as of August 23, 1997 may reserve up to 0.95 percent of the numbers the RespOrg had in working status on August 23, 1997.

5. RespOrgs are reminded that under the Commission's regulations, 47 C.F.R. § 52.105, RespOrgs may not reserve toll free numbers without having an actual toll free subscriber for whom those numbers are being reserved.

We also direct a limitation on the processing and granting of Responsible Organization applications as follows:

1. DSMT may process and grant (where appropriate) applications that it has received, in its office, as of the date of this letter. RespOrgs certified as a result of this procedure may reserve up to 200 numbers per week during the period that the conservation plan is in effect.

2. DSMT may process and grant (where appropriate) applications that it receives after the date of this letter. RespOrgs certified as a result of this procedure may not reserve toll free numbers until the 877 code is opened.

We also direct DSMT to file with the Network Services Division of the Common Carrier Bureau and with SNAC a weekly report containing the following information:

1. The quantity of numbers in the spare pool.
2. The quantity of numbers being returned to the spare pool of available numbers each week by category (for example, numbers that have been disconnected and whose aging period has expired, numbers that were reserved but not assigned and are automatically returned after 45 days, etc.).
3. The quantity of numbers actually reserved from Sunday to Saturday, each week, beginning Sunday, October 5, 1997.

By this letter, DSMT is directed to assign toll free numbers in accordance with the procedures required above until further notice by the Bureau. The procedures required above should be implemented as of 12:01 a.m., Eastern Daylight Time, Saturday, October 4, 1997.

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We also direct DSMI to send by facsimile transmission a copy of this letter to each RespOrg to notify them of the procedures discussed above.

Thank you for your cooperation in implementing this plan.

Sincerely yours,



A. Richard Metzger, Jr.
Acting Chief
Common Carrier Bureau

cc: Susan Miller, Alliance for Telecommunications Solutions
Don Werner, Liaison to the FCC on behalf of the OBF's SNAC