

FILED²
SEP 5 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Petition of the North)
American Numbering Plan Administrator,)
on Behalf of the Missouri Telecommunications) Case No. TO-2000-374
Industry, for Approval of NPA Relief Plan for)
the 314 and 816 Area Codes.)

**SPRINT MISSOURI, INC.'S RESPONSE TO STAFF'S MOTION AND
SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE
TO ESTABLISH POOLING TRIALS IN THE 314 AND 816 NPAS**

COMES NOW Sprint Missouri, Inc. d/b/a Sprint and for its Response to Staff's Motion and Southwestern Bell Telephone Company's ("SWBT") to Establish Pooling Trials in the 314 and 816 NPAs, states as follows:

1. On August 24, 2001, Staff of the Missouri Public Service Commission filed a Motion to Establish Pooling Trials in the 314 and 816 NPAs. Specifically, Staff recommended the Commission implement thousands-block pooling trials in both the 314 and 816 NPAs. In support of this recommendation, Staff stated that "implementing pooling trials would extend the lives of the 314 and 816 NPAs, and delay the need for the overlays and the resulting 10-digit local dialing."

2. SWBT, on September 4, 2001, filed its Response to Staff's motion. SWBT requested that the Commission deny Staff's Motion to Establish Pooling Trials in the 314 and 816 NPAs. Citing various reasons, SWBT stated that the thousands-block pooling trials proposed by Staff would result in Missouri consumers bearing the cost of state-sponsored number pooling trials while also bearing the cost of national number pooling. Additionally, SWBT reiterated what the Technical Sub-Committee reported -- that currently there appears to be no immediate need to implement any relief in the 314 and 816 NPAs. Further, SWBT noted

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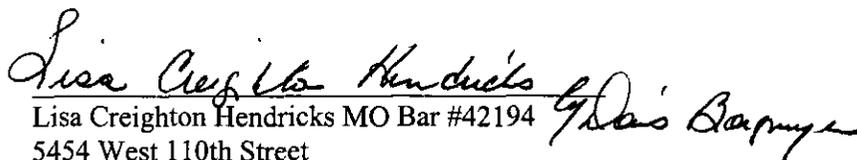
that the exhaust dates for the 314 and 816 NPAs were sufficiently in the future, and that the 314 area code would likely be in the first phase of a federal pooling trial. Sprint agrees with SWBT's positions.

3. Sprint respectfully requests that the Commission deny Staff's request for pooling trials in the 314 and 816 NPAs. These proposed trials are unnecessary and will consume the resources of both the Commission staff and the industry. Further, the proposed trials could potentially result in additional cost being passed onto Missouri consumers.

4. Sprint believes a state number pooling trial at this time would be unnecessary and possibly duplicative as it is anticipated that the 314 NPA will be a high priority on the FCC's implementation schedule for national number pooling. While the FCC's schedule has not yet been released, it is expected to be released very shortly and the 314 NPA meets the three guidelines for numbering pooling: (1) it is included in the top 100 MSAs; (2) it is currently in status for exhaust; and (3) the current life of the NPA is greater than one year.

WHEREFORE, for the above-described reasons, Sprint supports SWBT in requesting that the Commission deny Staff's Motion to Establish Pooling Trials in the 314 and 816 NPAs.

Respectfully submitted,
SPRINT


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CERTIFICATE OF SERVICE

A copy of the foregoing document was served on the following parties by first-class, postage prepaid, U.S. Mail on September 5, 2001.

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