

FILED³

AUG 31 2001



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Public Counsel

State of Missouri

**Missouri Public
Service Commission** Bob Holden
Governor

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August 31, 2001

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

**RE: North American Numbering Plan
TO-2000-374**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **OFFICE OF THE PUBLIC COUNSEL'S SUGGESTIONS IN SUPPORT OF THE TECHNICAL IMPLEMENTATION SUBCOMMITTEE REPORT TO THE COMMISSION ON THE EXTENSION TO THE IMPLEMENTATION DATES FOR THE 314 NPA AND 816 NPA RELIEF PLANS**. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, reading "Michael F. Dandino".

Michael F. Dandino
Senior Public Counsel

MFD:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

AUG 31 2001

Missouri Public
Service Commission

In the Matter of the North American)
Numbering Plan Administrator's Petition)
for Approval of NPA Relief Plan for the)
314 and 816 Area Codes)

Case No. TO-2000-374

**OFFICE OF THE PUBLIC COUNSEL'S SUGGESTIONS IN SUPPORT
OF THE TECHNICAL IMPLEMENTATION SUBCOMMITTEE REPORT
TO THE COMMISSION ON THE EXTENSION TO THE
IMPLEMENTATION DATES FOR THE 314 NPA AND 816 NPA RELIEF
PLANS**

Comes now the Office of the Public Counsel and respectfully suggests to the Public Service Commission of the State of Missouri that it approve the recommendations of the Technical Implementation Subcommittee Report to the Commission on the Extension to the Implementation Dates for 314 NPA and 816 NPA Relief Plans filed on August 31, 2001.

On July 23, 2001, Public Counsel filed its Motion to Further Postpone Implementation Dates For 314 NPA and 816 NPA Relief Plans because the rate of exhaust for NXXs in both 314 and 816 has been significantly less than projected. As a result, Public Counsel believed that NPA relief for both area codes could be further postponed.

Public Counsel participated in a conference with the subcommittee telecommunications companies and the Staff. This Office has reviewed the Subcommittee's Report and the recommendations to indefinitely postpone area code

relief and to ask NANPA to review and revise its projected exhaust dates for 314 to more accurately reflect the actual code usage. Public Counsel welcomes industry support on these issues and, therefore, fully and strongly supports these Subcommittee recommendations. Public Counsel has urged the Commission to implement number pooling since early 1998. For almost as long, Public Counsel has expressed concerns regarding NANPA's exhaust projections relative to the actual rate of code usage in Missouri. It is paramount that the Commission take action now to request that NANPA develop a more realistic projection for the life of 314. The penalty for delay or inaction may be foreclosure from participation in the initial rounds of national number pooling and ultimately the confusion, inconvenience, and expense of an unnecessary overlay of the 314 area code.

Public Counsel does not agree that we should be inactive while awaiting the release of the national pooling roll-out schedule. Therefore, we fully concur with the separate Staff Report and Recommendation regarding advancing number pooling. Public Counsel strongly supports efforts to place Missouri in a position to be included in the initial stage of the national roll-out of the numbering project. However, Public Counsel agrees with Staff that, if Missouri is not included in the national program, the state should commence its own number pooling program in 314 and 816. For these reasons, Public Counsel urges the Public Service Commission to approve the recommendations.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

MARTHA S. HOGERTY
PUBLIC COUNSEL

By: 

Michael F. Dandino (24590)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed via U. S. Mail postage prepaid on this 31 day of August, 2001 to the counsel of record on the attached service list.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed or faxed this 31st day of August, 2001 to the following counsel of record:

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