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Case No: TO-2000-374

**SOUTHWESTERN BELL TELEPHONE COMPANY**

**CASE NO. TO-2000-374**

**DIRECT TESTIMONY**

**OF**

**DEBORAH F. BELL**

Dallas, Texas  
May, 2000

38

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF DEBORAH F. BELL

STATE OF TEXAS )  
 ) SS  
CITY OF DALLAS )

I, Deborah F. Bell, of lawful age, being duly sworn, depose and state:

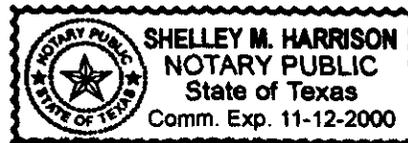
1. My name is Deborah F. Bell. I am presently Area Manager-NPA Relief Planning for SBC Operations, Inc.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

  
Deborah F. Bell

Subscribed and sworn to before this 8<sup>th</sup> day of May, 2000

  
Notary Public

My Commission Expires: \_\_\_\_\_



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1 **Q. As Area Manager-NPA Relief Planning, what are your general duties?**

2 A. My primary responsibility is to coordinate area code relief planning and  
3 implementation efforts for the five-state Southwestern Bell area which  
4 includes Missouri, Oklahoma, Kansas, Arkansas, and Texas. Addressing  
5 other numbering issues at the state level is also within my area of  
6 responsibility.

7

8 **Q. Have you previously presented testimony before the Missouri Public  
9 Service Commission (Commission)?**

10 A. No.

11

12 **Q. What did you do to prepare to testify in this case?**

13 A. In addition to utilizing my prior experience and training, I have reviewed  
14 various federal and state decisions involving numbering issues including  
15 FCC 00-104 – CC Docket No. 99-200 *Numbering Resource Optimization  
16 Report and Order and Further Notice of Proposed Rule Making (FCC NRO  
17 Report)* released on March 31, 2000.

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23

1 **TESTIMONY**

2 **Q. What is the purpose of your testimony?**

3 A. The purpose of my testimony is to provide SWBT's position on relief for the  
4 314 and 816 area codes. I will also discuss 9-1-1 impacts. In addition, I will  
5 provide SWBT's position on various issues associated with number  
6 conservation measures – sequential number assignment, utilization  
7 reporting, utilization thresholds, thousand-block number pooling, reclamation  
8 of unused codes, and rate center consolidation – as they impact the 314 and  
9 816 area codes. SWBT strongly supports the creation of national standards  
10 as the best means of addressing numbering resource optimization. The *FCC*  
11 *NRO Report* took steps toward the promotion of standards that will clearly  
12 accelerate efficiencies in the nationwide utilization of numbers.

13

14 **Q. What is Southwestern Bell's general position related to implementation  
15 methods (overlay vs. split) for NPA relief?**

16 A. SWBT does not have an ironclad position on whether splits or overlays are  
17 better in all cases. Instead, we support the method that makes the most  
18 sense in each geography. Evaluations are made on an individual case  
19 basis. Generally speaking, SWBT supports overlays in metropolitan areas  
20 and splits in the more rural areas. In most instances, an overlay can  
21 substantially increase the number of NXX codes available to all  
22 telecommunications providers in a significantly shorter period of time and with  
23 less disruption and inconvenience for consumers than with a split.

1 **SECTION I - 314 NPA**

2 **Q. Is area code relief being planned for the 314 NPA already?**

3 A. Yes. According to the January, 2000 projections of Neustar, the North  
4 American Numbering Plan Administrator (NANPA), the 314 NPA will exhaust  
5 by third quarter 2001. On April 17, 2000, Neustar declared the 314 NPA to be  
6 in jeopardy. A jeopardy condition exists when the demand for NXX codes will  
7 result in exhaust prior to the time relief is scheduled to be provided.

8

9 **Q. How many NXX codes were gained with the last 314 area code relief?**

10 A. As the Commission is aware, the prior split involving the 314 NPA was not  
11 evenly divided because the Commission sought to retain 7-digit local dialing  
12 within the mandatory portions of the Metropolitan Calling Area (MCA). When  
13 the 636 NPA was introduced via a split on May 22, 1999, approximately 200  
14 new NXXs of a possible 792 NXXs were gained in the 314 NPA according to  
15 NANPA's Missouri Central Office Code Administrator. With only 200 new  
16 NXXs gained, coupled with continuous demand, further relief has become  
17 necessary.

18

19 **Q. What is SWBT's position regarding the appropriate relief method for the**  
20 **314 NPA?**

21 A. SWBT's first choice of a relief method for the 314 NPA is the retroactive  
22 overlay. The industry recommended this alternative as well. SWBT has

1 implemented retroactive overlays in both the Houston and Dallas areas with  
2 very little customer confusion.

3

4 **Q. What is a retroactive overlay?**

5 A. A retroactive overlay is a modification of the overlay alternative relief method.  
6 Just as with an overlay, a retroactive overlay occurs when more than one  
7 code serves the same geographic area. Code relief is accomplished by  
8 erasing the lines that were originally drawn during the implementation of an  
9 earlier split of the NPA. In the 314 area, this method would mean that the  
10 line that divides 314 from the recently created 636 NPA would be removed;  
11 therefore, the two separate number planning areas would be combined into  
12 one geographic area. This method, as with the overlay, will necessitate 10-  
13 digit dialing of local calls.

14

15 **Q. Why does SWBT support a retroactive overlay?**

16 A. It is our belief that the benefits of a retroactive overlay outweigh those of a  
17 split. In the 314/636 area, where there has been uneven growth, a  
18 retroactive overlay would result in a more efficient utilization of numbers and  
19 postpone the need to immediately implement an additional NPA. From a  
20 customer perspective, customers would not have to change their 10-digit  
21 telephone numbers and thus, would not have to incur immediate expenses for  
22 associated costs – e.g. changes to personal and business checks, business  
23 cards, advertisements, stationery etc. For customers that have just recently

1 experienced a split of the 314 NPA (February 26, 2000) when the 636 NPA  
2 was implemented, a retroactive overlay would not necessitate that these  
3 same customers learn a new set of geographic boundaries again.  
4 Implementation of a retroactive overlay would create a consistent local dialing  
5 pattern within the St. Louis area. Additionally, the mandatory local calling  
6 scope in St. Louis would be divided if the 314 NPA were to undergo another  
7 split. This action would result in a significant amount of 10-digit dialing of local  
8 calls, thus eliminating the main perceived advantage of a split – retention of 7-  
9 digit local dialing.

10  
11 **Q. Is ten-digit local dialing difficult for customers to learn?**

12 **A.** While customers will need some education about 10-digit local dialing instead  
13 of 7-digit dialing, the amount and duration of that education is significantly less  
14 with a retroactive overlay because customers have already gained knowledge  
15 about 10-digit local dialing through the 636 split. Experience in other states  
16 shows that customers do adapt to 10-digit dialing after getting through the  
17 initial implementation phase. Furthermore, it has been SWBT's experience in  
18 Houston and Dallas that once an overlay has been implemented, subsequent  
19 relief in the form of an overlay has proven to cause less customer confusion,  
20 disruption, and inconvenience than earlier splits. Customer education for  
21 subsequent overlays is minimal. Also, from a network technical perspective<sup>1</sup>,  
22 subsequent overlays can provide relief in a significantly more abbreviated

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<sup>1</sup> Other factors, such as customer notification, also factor into the time needed to implement NPA relief. Hence, a geographic split requires 9 to 12 months to implement and an overlay requires 6 to 9 months to implement.

1 implementation period (3 months) than a split (6 to 9 months). Additionally,  
2 once an overlay is implemented and mandatory 10-digit dialing is introduced,  
3 existing customers will not again have to be exposed to the requirement of  
4 changing their telephone numbers – as long as overlays continue to be the  
5 mandated relief method.

6  
7 **Q. Does SWBT have a second choice as a relief alternative for the 314**  
8 **NPA?**

9 **A.** SWBT supports an all-service overlay as a second choice.

10  
11 **Q. What guidelines must the Commission follow if it wishes to implement**  
12 **a geographic split?**

13 **A.** The Commission must adhere to the “NPA Code Relief Planning and  
14 Notification Guidelines.” Ideally, in the case of splits, all of the codes in a  
15 given area should exhaust about the same time and should cover a period of  
16 at least five years beyond the predicted date of exhaust. The Guidelines  
17 further state that a difference in NPA lifetimes of more than 15 years should  
18 be avoided. It is also recommended that customers who undergo number  
19 changes shall not be required to change again for a period of 8 –10 years.  
20 Applying these guidelines to the current 314 NPA would result in a split that  
21 would require substantial 10-digit local dialing.

22  
23 **Q. Are there any 9-1-1 issues associated with the introduction of a new**

1           **area code in the 314 NPA?**

2    A.    At this point, no. In contrast to earlier information provided to Neustar, there  
3           is a spare number plan digit (NPD) slot available in the Webster Groves 9-1-1  
4           tandem. In order to provision for 9-1-1, an NPD<sup>2</sup> is an essential means of  
5           communicating the proper area code of the caller. The current equipment  
6           only allows for the use of four (4) NPDs and therefore only four (4) NPAs can  
7           be served. Hence, when a fifth NPA is introduced, it becomes necessary for  
8           all Public Safety Answering Points (PSAPs) to upgrade their equipment. The  
9           availability of this slot allows for the implementation of area code relief using  
10          either the split or overlay methodology without completing equipment  
11          upgrades prior to introduction of the new NPA.

12  
13    **Q.    When should the Commission issue a decision on 314 NPA relief?**

14          The industry recommended a permissive start date of June 3, 2000, and the  
15          start of mandatory ten-digit dialing by December 2, 2000, with a retroactive  
16          overlay. In view of the current Procedural Schedule, it appears that those  
17          dates are in jeopardy. Hence, SWBT recommends that the Commission  
18          issue an order in September, 2000 following the hearings. An order for a  
19          retroactive overlay would allow for the start of permissive and customer  
20          education in October, 2000 and a mandatory start date in March, 2001 –

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<sup>2</sup>When the telecommunications industry grew to the point that switches needed to serve more than one area code, NPDs were created. NPDs were originally designed so that PSAPs would know which area code to associate with a 7-digit number. Today, separate trunk groups are established for each NPA served within the 9-1-1 switch and carry a number designation. This designation of 0 to 3 is the NPD. The NPD is prefixed to the 7-digit number of the caller instead of the 3-digit area code and delivered to the PSAP.

1 implementation in six (6) months. However, a geographic split would require  
2 more time to implement, (nine (9) to twelve (12) months), and a decision to  
3 order a split should be made as soon as possible<sup>3</sup> in order to avert premature  
4 exhaust<sup>4</sup> and to allow sufficient customer education time.

5  
6 **Q. What steps are involved in implementation of area code relief, and why  
7 can an overlay be implemented more quickly than a split?**

8 A. Although the *FCC NRO Report* approves several number conservation  
9 measures, implementation of these measures will not eliminate the need to  
10 implement relief in the 314 NPA quickly. There are still implementation issues  
11 such as customer education and network timelines that must be developed  
12 and executed. When developing timelines for NPA relief, the timetables will  
13 readily reflect that customer education and network efforts required for an  
14 overlay are considerably less than what is required for a split.

15  
16 **SECTION II - 816 NPA**

17 **Q. When was the last relief activity implemented in the 816 NPA?**

18 A. The 660 NPA was implemented as a result of a split of the 816 NPA in 1997.  
19 The projected exhaust date for the 660 NPA is fourth quarter 2019 and the  
20 projected exhaust date for the 816 NPA is fourth quarter 2001.

21  

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<sup>3</sup> Even an August 2000 decision might well be too late to avoid a premature exhaust situation.

<sup>4</sup> The 314 Jeopardy plan allows for an allocation of 14 codes per month through June, 2001.

1 **Q. What is SWBT's position regarding the appropriate relief method for the**  
2 **816 NPA?**

3 A. SWBT believes that the better option for the 816 NPA is the overlay as  
4 recommended by the industry. It is our belief that the benefits of an overlay  
5 outweigh those of a split from a customer perspective. Customers would not  
6 have to change their 10-digit telephone numbers (or learn new phone  
7 numbers for present friends and associates) and thus, would not have to incur  
8 immediate expenses for associated costs -- e.g. changes to personal and  
9 business checks, business cards, advertisements, stationery etc.

10  
11 **Q. Is ten-digit local dialing difficult for customers to adapt to?**

12 A. While customers will need some education about 10-digit local dialing instead  
13 of 7-digit local dialing, the customers do adapt. The recent shift to 10-digit  
14 local dialing between Kansas and Missouri is an example demonstrating  
15 customers' ability to adjust. Customers also adjusted to 10-digit local dialing  
16 in Dallas and Houston. Furthermore, it has been SWBT's experience in  
17 Houston and Dallas that once an overlay has been implemented, subsequent  
18 relief in the form of an overlay has proven to cause less customer confusion,  
19 disruption, and inconvenience than earlier splits. Customer education for  
20 subsequent overlays is minimal. From a network and technical perspective<sup>5</sup>,  
21 an overlay can provide relief in a significantly more abbreviated  
22 implementation period (3 months) than a split (6 to 9 months). Additionally,  
23 once an overlay is implemented and mandatory 10-digit dialing is introduced,

1 existing customers will not again have to be exposed to the requirement of  
2 changing their telephone numbers -- as long as overlays continue to be the  
3 mandated relief method.

4  
5 **Q. Are there any 9-1-1 issues associated with NPA relief implementation in**  
6 **the 816 NPA?**

7 A. Yes. The Hedrick central office serves the Kansas City 9-1-1 community  
8 today. Currently, there are not any spare NPD slots available in this office.  
9 Regardless of the method chosen for implementation of another NPA –  
10 split or overlay – a new 9-1-1 configuration would have to be designed. In  
11 order to provision for 9-1-1, an NPD is an essential means of communicating  
12 the proper area code of the caller. Current equipment only allows for the use  
13 of four (4) NPDs and therefore only four (4) NPAs. Hence, when a fifth NPA  
14 is introduced, it becomes necessary for all Public Safety Answering Points  
15 (PSAPs) to upgrade their equipment. SWBT is in the process of developing  
16 a plan to address the absence of a spare NPD slot.

17  
18 **Q. When should the Commission issue a decision on 816 NPA relief?**

19 A. The industry has recommended an implementation schedule with the  
20 permissive start date of August 5, 2000 and the mandatory start date of  
21 February 3, 2001. The Commission should make a decision now as to the  
22 type of relief for the 816 NPA. In view of the current Procedural Schedule, it

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<sup>5</sup> See footnote 1.

1 appears that those dates are in jeopardy. Hence, SWBT recommends that  
2 the Commission issue an order in September, 2000 following the hearings.  
3 If the Commission issues an order for an overlay, it would allow for the start of  
4 permissive and customer education in October, 2000. The new NPA could be  
5 in effect prior to the fourth quarter 2001 projected exhaust date. However, if  
6 the Commission opts for a split, the relief plan cannot be implemented by  
7 February, 2001 since it takes a minimum of nine months to implement a split.  
8 A nine-month implementation also does not take into account the additional  
9 time that may be needed to make upgrades to the 9-1-1 system. Accordingly,  
10 in order to avoid a possible premature exhaust, the Commission should issue  
11 any order requiring a split as soon as possible. Although the FCC *NRO*  
12 *Report* approves several number conservation measures, implementation of  
13 these measures will not eliminate the need to implement relief in the 816 very  
14 quickly. There are still implementation issues such as customer education,  
15 9-1-1 upgrades, and network timelines that must be developed and executed.

16  
17 **SECTION III – NUMBER CONSERVATION ISSUES**

18 **Q. What is SWBT's position on number conservation methods?**

19 A. SWBT supports number conservation methods that are consistent with the  
20 FCC's guidelines.

21  
22 **Q. What is the first conservation measure that you would like to address?**

23 A. Sequential numbering.

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**Q. Would you please define sequential numbering?**

A. Certainly. SWBT defines sequential numbering as relating to number assignments from a given thousand-block sequence. Numbers within the 1000 block sequence may be assigned as determined by the carrier and would not all be assigned sequentially. This type of sequential numbering is employed when NXX code holders make assignments of telephone numbers out of a single one thousand number block group at a time. When a specified utilization threshold has been achieved, assignments are then made from another 1000 block sequence within the same NXX. Exceptions are allowed for technology restrictions (i. e. customer's telephone equipment requires specific thousand block digits and does not respond appropriately to certain digits such as 0, 1, or 9) or when a new request cannot be met because there is not a sufficient quantity of numbers remaining within the thousands block currently open for assignments. This definition is consistent with FCC's recently adopted requirement. (*FCC NRO Order, par. 244-246*).

**Q. Why should Missouri consider implementing thousands block sequential numbering?**

A. Implementing this described measure preserves clean thousands blocks from contamination and improves utilization of numbers in non-pooling environments. Hence, when number pooling is implemented, advance steps would have already been taken to preserve pristine thousand blocks for

1 donation to the rate center pools. Lastly, SWBT supports sequential  
2 numbering within the scope of established national standards. SWBT  
3 encourages the Commission to adopt the FCC requirements since the  
4 Commission will be required to conform to them by January 1, 2001 (*FCC*  
5 *NRO Report* , par. 246).

6  
7 **Q. What is the next measure you would like to comment on?**

8 A. Rate Center Consolidation.

9  
10 **Q. What is SWBT's position on rate center consolidation in the 314 NPA?**

11 A. SWBT supports the consolidation of existing rate centers in areas where  
12 consolidation would not negatively affect consumers' existing local calling  
13 areas, SWBT is able to remain revenue neutral, and all incumbent local  
14 exchange companies (ILEC) and competitive local exchange companies  
15 (CLEC) comply. Pursuant to the Commission's order in Case No. TO-99-14,  
16 SWBT implemented rate center consolidation in the 314 NPA in December,  
17 1999. This previous rate center consolidation effort allowed for a reduction  
18 from 14 rate centers to 7 rate centers in the St. Louis area without impacting  
19 any existing local calling scopes.

20  
21 **Q. Does SWBT support additional rate center consolidation in the 314**  
22 **NPA?**

23 A. Although SWBT is willing to continue discussion of additional consolidation of

1 314 rate centers, the Commission would need to thoroughly investigate the  
2 anticipated benefits of further consolidation. SWBT has determined that  
3 further rate center consolidation in the St. Louis area would require changes  
4 to local calling scopes and local rates. It is also SWBT's position that rate  
5 center consolidation must be accomplished on a revenue neutral basis.  
6

7 **Q. What is SWBT's position on rate center consolidation in the 816 NPA?**

8 A. SWBT supports the consolidation of existing rate centers in areas where  
9 consolidation would not negatively affect consumers' existing local calling  
10 areas, SWBT is able to remain revenue neutral, and all ILECs and CLECs  
11 comply. The first step for SWBT will be to conduct a thorough investigation of  
12 the Missouri portion of the Kansas City exchange with the goal of determining  
13 if there are any problems associated with the consolidation in this area i.e. any  
14 technical or operational issues, especially 9-1-1 impacts. The results of this  
15 examination will dictate the number of rate centers that could be included.  
16 SWBT has begun this investigation and initially estimates that it could reduce  
17 from 13 to 5 the number of rate centers within the Kansas City metropolitan  
18 exchange without impacting customers' calling scopes or local rates. SWBT  
19 generally supports implementation of rate center consolidation which does not  
20 change local calling scopes so long as it is accomplished on a revenue  
21 neutral basis.  
22

23 **Q. Does SWBT intend to move forward with rate center consolidation in the**

1 **Kansas City area?**

2 A. Yes. Unless SWBT uncovers major operational obstacles, SWBT plans  
3 to proceed with reviewing the potential of consolidation of rate centers in the  
4 Kansas City area. The Commission should establish the requirement that all  
5 local exchange carriers (LECs) – including ILECs and CLECs – should abide  
6 by the same terms and conditions when consolidating rate centers. SWBT  
7 recommends that the Commission address rate center consolidation within its  
8 area code relief decision.

9  
10 **Q. Is there another conservation measure that SWBT supports?**

11 A. Yes, code reclamation. SWBT embraces enforcement of newly adopted  
12 FCC administrative standards which allow for reclamation of unused  
13 numbering resources as delineated in the FCC Order (*FCC NRO Order*, par.  
14 237-241). Neustar, working with the state commissions, should immediately  
15 begin the code reclamation process in Missouri.

16  
17 **Q. What is SWBT doing in the 314 and 816 NPAs to comply with the FCC**  
18 **Order to return codes?**

19 A. SWBT is currently investigating the status of our assigned NXX codes in  
20 order to identify any codes that may be returned to Neustar. Any codes that  
21 are no longer needed will be returned in a timely manner consistent with the  
22 FCC guidelines.

1 **Q. What is SWBT's position on utilization and forecasting reporting?**

2 A. SWBT supports the FCC requirement that all service providers must submit  
3 forecasting and utilization data to NANPA. In addition, SWBT agrees with the  
4 FCC that "the basic frequency of reporting shall be semi-annually." The  
5 FCC, however, allows the state commissions to reduce the frequency to  
6 annual submissions. (*FCC NRO Order*, par. 67) Under these guidelines,  
7 reporting of historical utilization data at the thousands block NPA level is  
8 sufficient. However, pooling carriers are required to report forecast data at the  
9 rate center level using thousands blocks. SWBT agrees with the FCC that it  
10 is imperative that any current state created utilization formats be blended into  
11 one document to be used universally by every state. Also, the codification of  
12 category definitions will go a long way in assuring that carrier reported  
13 information is comparable. The FCC order requires carriers to report in five  
14 categories – assigned, intermediate, reserved, aging, and administrative.

15  
16 **Q. The *FCC NRO Report* requests comments on the proposed utilization  
17 thresholds. What is SWBT's position on this?**

18 A. The *FCC NRO Report* requests comment on the proposed nationwide  
19 utilization. It also requests comment on whether the FCC should adopt a  
20 rate center-based utilization threshold, and it asks whether it should  
21 delegate to state commissions the authority to set this threshold rate.  
22 SWBT believes that it is in the best interest of number optimization for a  
23 nationwide and uniform standard to be utilized with no deviation permitted

1 by any state commission. SWBT believes that an initial threshold of 55  
2 percent to be increased five percent a year to a maximum of 70 percent at  
3 the carrier's "Lowest Code Assignment Point (LCAP) is the best method<sup>6</sup>.  
4 SWBT believes that the exclusion of certain categories (e.g.  
5 employee/official company, test, location routing numbers – LRN, etc.)  
6 from the utilization calculation will not provide an accurate representation  
7 of the actual usage of the phone numbers by carriers or by the public  
8 telephone switched network (PTSN).

9  
10 **Q. What is "Lowest Code Assignment Point - LCAP?"**

11 **A.** LCAP is the lowest point at which a carrier assigns resources in an area.  
12 In an area where a carrier has more than one switch serving a single rate  
13 center (such as a major metropolitan area), the LCAP would be at the  
14 requesting switch. In areas where a single switch serves more than one  
15 rate center, the LCAP would be the rate center. The LCAP measures  
16 code demand where it actually arises, and it therefore provides a more  
17 accurate measure of a carrier's need for additional numbers.

18  
19 **Q. Where does SWBT stand on thousands block number pooling**  
20 **(TBNP) as a conservation method?**

21 **A.** SWBT continues to support number pooling in the top 100 MSAs and

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<sup>6</sup> If utilization is developed at an NPA level, the threshold should be 40 – 55%.

1 requires that costs associated with its deployment be recovered.  
2 Generally speaking, number pooling has the potential of delaying the  
3 exhaust date of NPAs. As a result, TBNP also delays customer  
4 inconvenience associated with any method of area code relief.

5  
6 **Q. Does Southwestern Bell support number pooling as a methodology**  
7 **of number conservation in the state of Missouri?**

8 A. Yes. The *FCC NRO Order* sets certain parameters for candidates for  
9 early introduction for number pooling -- jeopardy NPAs in the largest 100  
10 MSAs which have a life of one year or more. NPAs that will exhaust in  
11 less than a year, based on the most current quarterly forecast issued by  
12 the NANPA at the time the quarterly schedule is established by the FCC,  
13 will not be treated as priority NPAs for pooling purposes. (*FCC NRO*  
14 *Order*, par. 164), The schedule will be divided in three-month segments,  
15 with the first round of implementation beginning nine months after the  
16 selection of a pooling administrator. The schedule for each quarter will  
17 contain three NPAs from each of the seven NPAC regions that are within  
18 the largest 100 MSAs. (*FCC NRO Order*, par. 163) The decision as to  
19 which NPAs will be considered highest on the priority list for rollout of the  
20 number pooling will be made by the FCC in conjunction with the Pooling  
21 Administrator. Acknowledging the uncertainty of a national number  
22 pooling rollout schedule coupled with the unnecessary increased expense  
23 and societal costs associated with a state number pooling trial (including

1 the requirement to implement a state cost recovery plan), SWBT believes  
2 that a state number pooling trial will not provide significant benefit to  
3 telephone subscribers and the telecommunications industry at this time.  
4 Therefore, SWBT does not support a number pooling trial in Missouri, but  
5 continues to support implementation of number pooling.

6  
7 **Q. Would you please summarize your testimony?**

8 A. First, SWBT supports a retroactive overlay in the 314 NPA and an overlay  
9 in the 816 NPA as the best method of NPA relief. With overlays, no  
10 customers will have to change their telephone numbers and no customer  
11 will have to learn new telephone numbers for their current contacts;  
12 therefore, overlays cause the least customer disruption. An overlay leaves  
13 the existing geography untouched and avoids further splitting of cities,  
14 communities of interest, or governmental districts. Thus, the question of  
15 which area should retain the old area code goes unasked. Subsequent  
16 relief activity in the form of overlays lends itself to quick and easy  
17 implementation. Secondly, although recent FCC activity allows for  
18 implementation of various number conservation measures, SWBT  
19 encourages the Commission to immediately order these overlay  
20 recommendations as the relief method while the industry works toward full  
21 compliance of the FCC NRO Order.

22  
23 **Q. Does this conclude your testimony?**

1 A. Yes.

2