

STATE OF FLORIDA

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Public Service Commission

July 29, 2002

VIA ELECTRONIC FILING

Honorable Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW - Portals II, TW-A325
Washington, DC 20554

Re: *Ex parte* Reply Comments of the Florida Public Commission in
CC Docket No. 92-237, Administration of the North American Numbering Plan
CC Docket No. 99-200, Number Resource Optimization
CC Document No. DA 02-1412, North American Numbering Plan Administration
Technical Requirements Document

Dear Ms. Dortch:

Pursuant to the request in Document No. DA 02-1412 and to Rule 1.1206 of the Federal Communications Commission rules, forwarded herewith are *Ex Parte* Reply Comments of the Florida Public Service Commission in the above dockets with regard to the North American Numbering Plan Administrator (NANPA) Technical Requirements for the next administration.

Should you have additional questions, you may contact Levent Ileri, the primary staff person in this docket, at (850) 413-6562.

Sincerely,

/ s /

Cynthia B. Miller, Esquire
Office of Federal and Legislative Liaison

CBM:tf

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Administration of the North American Numbering Plan)	CC Docket No. 92-237
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
North American Numbering Plan Administration Technical Requirements Document)	DA 02-1412
)	

**EX-PARTE REPLY COMMENTS OF THE
FLORIDA PUBLIC SERVICE COMMISSION**

The Florida Public Service Commission (FPSC) respectfully submits the following ex-parte reply comments to the Federal Communications Commission (FCC) in response to the FCC Wireline Competition Bureau seeking input on the North American Numbering Plan Administrator (NANPA) Technical Requirements for the next administration.

Introduction

The FPSC is pleased to have the opportunity to review and offer ex-parte reply comments to the FCC on the technical requirements which will form the basis for solicitation pursuant to the Federal Acquisitions Regulations (FAR) for the NANPA's next term of administration. The FPSC agrees with the FCC's intentions of ensuring that the NANPA procurement process is fair and maximizes value to the FCC and the telecommunications industry. The FPSC offers the following comments to assist the FCC in transforming the technical requirements into a solicitation document that enables thorough and fair bidding by all qualified parties.

Ex-parte Reply Comments

Section 5.1.10 of the NANPA Technical Requirements Document issued June 13, 2002, addresses possible NANPA testimony during the area code relief process and states:

NANPA may be requested to provide testimony to the state regulatory authorities regarding the relief plan, as necessary. The cost for this service should be treated as an enterprise service.

Previously, testimony provided by NANPA representatives during the area code relief process was included in NANPA's contract. By now including this service as an enterprise service, state commissions will be required to pay the cost of having NANPA representatives provide testimony during area code relief proceedings.

The FPSC agrees with NeuStar, Inc.'s comments filed on July 2, 2002. In its comments to the FCC, NeuStar stated that "[i]t has been NeuStar's experience as the incumbent NANPA that providing testimony before state commissions is such an integral part of the NPA relief process, it should be a duty incorporated into the cost of the NANPA contract." The FPSC notes that under the FCC's direction, NANPA administers numbering resources on a neutral, fair, effective, and efficient basis. After NANPA facilitates initial area code meetings with the industry members and the state commission staff, it submits an area code petition to the state commission. The FPSC supports NeuStar's position in that the FPSC believes that such duties are the "key" responsibilities of a NANPA contract when providing area code relief alternatives to the state commissions. Most state commissions use these relief alternatives during the area code service hearings to receive input from all affected parties. The FPSC believes it is essential that a NANPA representative attend the service hearings to describe each alternative along with the duties of NANPA, and answer questions

regarding the alternatives.

Therefore, the FPSC respectfully requests that the FCC consider the FPSC's concerns prior to incorporating the Requirements Document into the solicitation for the new NANPA.

Respectfully submitted,

/ s /

Cynthia B. Miller, Esquire
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(850) 413-6082

/ s /

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General Counsel
(850) 413-7286

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
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Dated: July 29, 2002

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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)	
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)	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing comments will be mailed to the persons on the attached list.

/ s /

CYNTHIA B. MILLER
Office of Federal and Legislative Liaison

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DATED: July 29, 2002

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