

**STATE OF FLORIDA**

COMMISSIONERS:  
E. LEON JACOBS, JR., CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
BRAULIO L. BAEZ  
MICHAEL A. PALECKI

DIVISION OF POLICY ANALYSIS &  
INTERGOVERNMENTAL LIAISON  
CHARLES H. HILL  
DIRECTOR  
(850) 413-6800

# Public Service Commission

November 6, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW - TW-A325  
Washington, DC 20554

Re: CC Docket No. 88-200, National Thousands-Block Number Pooling Rollout  
Schedule

Dear Ms. Salas:

Forwarded herewith are comments of the Florida Public Service Commission regarding the Federal Communications Commission Public Notice in the above-captioned docket.

Sincerely,

/ s /

Cynthia B. Miller, Esquire  
Bureau of Intergovernmental Liaison

CBM:tf

cc: Brad Ramsay, NARUC

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
National Thousands-Block Number	)	CC Docket No. 99-200
Pooling Rollout Schedule	)	
	)	DA 01-2419
	)	

**COMMENTS ON THE NATIONAL THOUSANDS-BLOCK  
NUMBER POOLING ROLLOUT SCHEDULE  
BY THE FLORIDA PUBLIC SERVICE COMMISSION**

**Introduction and General Comments**

The Florida Public Service Commission (FPSC) submits these comments in response to the Federal Communications Commission (FCC) Public Notice released on October 17, 2001 seeking comments on the National Thousands-Block Number Pooling Rollout Schedule.

The FPSC considers thousands-block number pooling an integral part of number conservation efforts being made to ensure that the numbering resources in the North American Numbering Plan (NANP) are used efficiently. The FPSC generally supports the FCC's National Thousands-Block Number pooling Rollout Schedule, and would like to submit the following comments.

**The Miami 305/786 area of the Miami-Ft. Lauderdale MSA should be included in the National Rollout Schedule.**

**Background**

By Order DA-01-2419, issued October 17, 2001, the FCC issued its proposed National Rollout Schedule for Number Pooling for the first eight quarters. The rollout schedule for national thousands-block number pooling is divided into three-month segments, or quarters.

Starting in March 2002, number pools will be established in approximately 21 numbering plan areas (NPAs) each quarter, with an initial concentration on NPAs in the top 100 MSAs, and a special focus on jeopardy NPAs that are within the largest 100 MSAs. Pooling trials that have commenced before March 2002 will be transitioned into the national pooling administration program prior to the national pooling rollout.

The following Florida Metropolitan Statistical Areas (MSAs) and Numbering Plan Areas (NPAs) are included in the national rollout tentative schedule:

<u>Area Code</u>	<u>Placement</u>	<u>MSA</u>
407/321	1 <sup>st</sup> Quarter	Orlando
941	2 <sup>nd</sup> Quarter	Sarasota-Bradenton
727	3 <sup>rd</sup> Quarter	Tampa-St. Petersburg-Clearwater
352	4 <sup>th</sup> Quarter	Tampa-St. Petersburg-Clearwater
813	5 <sup>th</sup> Quarter	Tampa-St. Petersburg-Clearwater (mandatory)
863	7 <sup>th</sup> Quarter	Lakeland-Winter Haven
850	7 <sup>th</sup> Quarter	Pensacola

Although the Miami-Ft. Lauderdale MSA is the twelfth largest MSA in the country according to the 2000 Census<sup>1</sup>, the 305/786 NPAs in the Miami-Dade area are not included on the tentative National Thousands-Block Number Pooling Rollout Schedule. This may be just an oversight caused by the fact that there is presently a state voluntary pooling trial in the 305 NPA. We emphasize that this voluntary trial is taking place only in the Keys area. A state pooling trial was also

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<sup>1</sup> Census 2000 PHC-T-3, Table 3

implemented in the Ft. Lauderdale 954 NPA on January 22, 2001. The Miami area 305/786 NPAs are not, however, presently being pooled, nor are they scheduled to be pooled.

According to the 2000 Census<sup>2</sup>, the Miami-Dade area, which includes the 305/786 NPAs, has a population of 2,253,362 people. The FPSC believes it is crucial to include the Miami 305/786 NPAs in the National Thousands-Block Number Pooling Rollout Schedule to fulfill the number conservation goals of the State of Florida.

As required to substitute an alternative NPA<sup>3</sup>, the 305/786 NPAs in the Miami-Ft. Lauderdale MSA have a life span of at least one year (estimated exhaustion date-fourth quarter 2006), and are located within one of the top 100 MSAs (Miami-Ft. Lauderdale MSA is the twelfth largest).

Therefore, the FPSC respectfully requests that the 305/786 NPAs located in the Miami-Ft. Lauderdale MSA be included in the National Rollout Schedule. To accomplish this, the FPSC recommends that the Miami 305/786 NPAs be substituted for the Sarasota-Bradenton 941 NPA placement in the second quarter of the national rollout.

By Order No. DA 01-2479, released October 24, 2001, the FPSC received authority from the FCC to implement a state number pooling trial in the 941 NPA provided the pooling trial is initiated prior to the commencement of national pooling. Implementing the 941 NPA state pooling trial will allow for the placement of the Miami 305/786 NPAs in the second quarter of the national pooling rollout.

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<sup>2</sup> Census 2000 PHC-T-3, Table 1

<sup>3</sup> DA 01-2419, page 2, ¶2

In conclusion, the FPSC respectfully requests that the 305/786 NPAs in the Miami-Ft. Lauderdale MSA be substituted for the 941 NPA in the Sarasota-Bradenton MSA for the second quarter of national pooling with all other Florida placements within the National Rollout schedule remaining the same.

Respectfully submitted,

/ s /

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CYNTHIA B. MILLER  
Bureau of Intergovernmental Liaison  
(850) 413-6082

/ s /

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HAROLD A. McLEAN  
General Counsel  
(850) 413-7286

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

DATED: November 6, 2001

**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.

---

CYNTHIA B. MILLER  
Bureau of Intergovernmental Liaison  
(850) 413-6082

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

DATED: November 6, 2001

The Honorable Michael Powell  
Chairman  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

The Honorable Kathleen Q. Abernathy, Commissioner  
Federal Communications Commission  
445 12th, SW - 8th Floor  
Washington, DC 20554

The Honorable Kevin J. Martin, Commissioner  
Federal Communications Commission  
445 Twelfth Street, SW - 8th Floor  
Washington, DC 20554

Brad Ramsay  
National Association of Regulatory Utility Commissioners  
1101 Vermont Avenue NW, Suite 200  
Washington, DC 20005

Dorothy Atwood  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Blaise Scinto  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Alabama Public Service Commission  
Post Office Box 304260  
Montgomery, Alabama 36130-4260

Virginia J. Taylor  
California Department of Consumer Affairs  
400 R Street, Suite 3090  
Sacramento, California 96814-6200

Mary Adu  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Peter Arth, Jr., Ellen S. LeVine  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

The Honorable Gloria Tristani  
Commissioner  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

The Honorable Michael J. Copps, Commissioner  
Federal Communications Commission  
445 Twelfth Street, SW - 8th Floor  
Washington, DC 20554

International Transcription Services, Inc.  
445 - 12th Street SW, Suite CY B400  
Washington, DC 20554

Diane G. Harmon, Chief  
Network Services Division  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Carol Matthey, Deputy Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Gregory Cooke  
Network Services Division  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Sam Loudenslager  
Arkansas Public Service Commission  
Post Office Box C-400  
Little Rock, Arkansas 72203

Richard A. Elbrecht  
California Department of Consumer Affairs  
400 R Street, Suite 3090  
Sacramento, California 96814-6200

Helen M. Mickiewicz  
Senior Staff Attorney  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102-3298

Marlene L. Johnson, Chairperson  
District of Columbia Public Service Commission  
717 14th Street, NW  
Washington, DC 20005

Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, Georgia 30334-5701

Sarah A. Naumer  
Illinois Commerce Commission  
State of Illinois Building  
160 N LaSalle - Suite C-800  
Chicago, Illinois 60601

Sandy Ibaugh  
Indiana Utility Regulatory Commission  
901 State Office Building  
Indianapolis, Indiana 46204

Mary Street  
Iowa Utilities Board  
Lucas Building, 5th Floor  
Des Moines, Iowa 50316

Glen F. Ivey, Chairman  
Maryland Public Service Commission  
6 St. Paul Street, 16th Floor  
Baltimore, Maryland 21202-6806

Janet G. Besser, James Connelly  
W. Robert Keating  
Massachusetts Dept of Telecommunications & Energy  
1 South Sta, Suite 2  
Boston, Massachusetts 02110-2212

Ann Seha, Manager, Public Utilities Division  
Minnesota Public Utilities Commission  
121 7th Place East  
St. Paul, Minnesota 55101

Dana K. Joyce  
General Counsel  
Missouri Public Service Commission  
Post Office Box 360  
Jefferson City, Missouri 65102

Deonne Brunning  
Nebraska Public Service Commission  
1200 N Street  
Lincoln, Nebraska 68508

Lawrence G. Malone, General Counsel  
New York Department of Public Service  
Three Empire State Plaza  
Albany, New York 12223-1350

Marsha H. Smith  
Idaho Public Utilities Commission  
Statehouse  
Boise, Idaho 83720

Harold L. Stoller, Richard S. Wolters  
Special Assistants Attorney General  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, Illinois 62792-9280

Diane Munns  
Iowa Utilities Board  
350 Maple Street  
Des Moines, Iowa 50319

Joel B. Shifman  
Maine Public Utility Commission  
State House Station 18  
Augusta, Maine 04865

Karlen J. Reed  
Commonwealth of Massachusetts  
Office of Consumer Affairs and Business Regulation  
1 South Sta, Suite 2  
Boston, Massachusetts 02110-2212

Ronald Choura  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, Michigan 48910

Marc D. Poston  
Missouri Public Service Commission  
Post Office Box 360  
Jefferson City, Missouri 65102

Robin McHugh  
Montana Public Service Commission  
Post Office Box 202601  
Helena, Montana 59620-2601

Keikki Leesment  
New Jersey Board of Public Utilities  
2 Gateway Center  
Newark, New Jersey 07102

Maureen O. Helmer, General Counsel  
New York State Department of Public Service  
3 Empire State Plaza  
Albany, New York 12223



Ann E. Henekener  
Assistant Attorney General  
Public Utilities Section  
180 East Broad Street  
Columbus, Ohio 43266-0573

Edward Morrison  
Oregon Public Utilities Commission  
Labor and Industries Building, Room 330  
Salem, Oregon 97310

James Lanni  
Rhode Island Division of Public Utilities  
100 Orange Street  
Providence, Rhode Island 02903

Richard A. Muscat, Assistant Attorney General  
Consumer Protection Division  
Public Agency Representation Section  
Post Office Box 12548, Capitol Station  
Austin, Texas 78711-2548

Glenn Blackmon  
Washington Utilities and Transportation Commission  
Post Office Box 47250  
Olympia, Washington 98504-7250

Charles J. Beck, Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison Street  
812 Claude Pepper Building  
Tallahassee, Florida 32399-1400

Bill Allen  
Bell Atlantic Telephone Corporation  
158 State Street  
Albany, New York 12207

Mary Liz Hepburn  
Bell Atlantic Telephone Corp.  
1300 I Street, NW  
Washington, DC 20005

Ronald J. Binz, Co-Chair  
North American Numbering Council  
Competition Policy Institute  
3773 Cherry Creek, North Drive, Suite 1050  
Denver, Colorado 80209

Maribeth D. Swapp, Deputy General Counsel  
Oklahoma Corporation Commission  
400 Jim Thorpe Building  
Oklahoma City, Oklahoma 73105

Bohdan R. Pankio, Chief Counsel  
Frank B. Wilmarth, Deputy Chief Counsel  
Pennsylvania Public Utility Comm.  
Post Office Box 3265  
Harrisburg, Pennsylvania 17105-3265  
Pennsylvania Office of Consumer Advocate  
555 Walnut Street, Forum Place, 5<sup>th</sup> Floor  
Harrisburg, Pennsylvania 67101-1923

Richard Collier, Chief Counsel  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Charles F. Larken  
Vermont Department of Public Service  
120 State Street  
Montpelier, Vermont 05602

Gary Evenson  
Wisconsin Public Service Commission  
Post Office Box 7854  
Madison, Wisconsin 53707

Richard Nelson  
Marion County  
Board of County Commissioners  
2631 SE Third Street  
Ocala, Florida 34471-9101

John M. Goodman  
Bell Atlantic Telephone Corp.  
1300 I Street, NW  
Washington, DC 20005

Alan Hasselwander, Chairman  
North American Numbering Council Frontier  
4140 Clover Street  
Honeoye Falls, New York 1472-9323

William P. Hunt, III  
Regulatory Counsel  
Level 3 Communications, Inc.  
1450 Infinite Drive  
Louisville, Colorado 80027

Richard M. Rindler  
James N. Moskowitz  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007

John S. di Bene  
SBC Communications, Inc.  
One Bell Plaza, Room 3022  
Dallas, Texas 75202

Jere W. Glover, Barry Pineles  
Office of Advocacy  
United States Small Business Administration  
409 Third Street SW, Suite 7800  
Washington, DC 20416

Kathryn Marie Krause, Dan L. Poole  
US West, Inc.  
1020 19th Street, NW, Suite 700  
Washington, DC 20036

David L. Kahn  
Bellatrix International  
4055 Wilshire Boulevard, Suite 415  
Los Angeles, California 90010

L. Marie Guillory  
National Telephone Cooperative Association  
4121 Wilson Boulevard, Tenth Floor  
Arlington, VA 22203-1801

James R. Hobson  
National Emergency Number Association  
c/o Donelan, Cleary, Wood & Maser  
1100 New York Avenue, Suite 750  
Washington, DC 20005-3934

Carl W. Northrop, E. Ashton Johnston  
Arch Communications Group - Airtouch Paging  
1299 Pennsylvania Avenue, NW, 10th Floor  
Washington, DC 20004-2400

Ameritech  
2000 W Ameritech Center Drive, Rm 4H86  
Hoffman Estates, Illinois 60196-1025

Robert M. Lynch, Roger K. Toppins  
SBC Communications, Inc.  
One Bell Plaza, Room 3022  
Dallas, Texas 75202

M. Robert Sutherland  
Theodore R. Kingsley  
BellSouth Corporation  
1155 Peachtree Street, NE  
Atlanta, Georgia 30309

Mark L. Evans, Sean A. Lev  
Kellogg, Huber, Hansen, Todd & Evans, PLLC  
1301 K Street, NW  
Suite 1000 West  
Washington, DC 20005

Jeffrey S. Bork  
US West, Inc.  
1020 19th Street, NW, Suite 700  
Washington, DC 20036

Thomas E. Taylor, Christopher J. Wilson  
Cincinnati Bell Telephone Co.  
c/o Frost & Jacobs  
2500 PNC Center, 201 E. Fifth Street  
Cincinnati, Ohio 45202

Robert M. Gurs  
Association of Public-Safety Communications  
Officials International, Inc.  
1666 K Street, NW, Suite 1100  
Washington, DC 20006

Charles H. Helein  
America's Carriers Telecommunications Association  
c/o Helein & Associates, P.C.  
8180 Greensboro Drive, Suite 700  
McLean, Virginia 22102

Charles H. Hunter, Kevin S. DiLallo  
Telecommunications Resellers Association  
c/o Hunter & Mow, PC  
1620 I Street, NW, Suite 701  
Washington, DC 20006

Mark Stachiw  
Arch Communications Group - Airtouch Paging  
Three Forest Plaza  
12221 Merit Drive, Suite 800  
Dallas, Texas 75251

Chuck Goldfarb  
WORLDCOM  
1133 19<sup>th</sup> Street NW  
Washington DC 20036

Michael Altschul, Randall S. Coleman  
Brenda K. Pennington  
Cellular Telecommunications Industry Association  
1250 Connecticut Avenue, SW, Suite 200  
Washington, DC 20036

Deborah Haraldson  
NYNEX Corporation  
1095 Avenue of the Americas  
New York, New York 10036

Jeffrey Sinsheimer, Jerry Yanowitz  
California Cable Television Assoc.  
4341 Piedmont Avenue  
Oakland, California 94611

David J. Gudino  
GTE Service Corporation  
1850 M Street, NW  
Suite 1200  
Washington, DC 20036

Jeffrey S. Linder  
GTE Service Corporation  
c/o Wiley, Rein & Fielding  
1776 K Street, NW, Suite 1100  
Washington, DC 20006

Nancy C. Woolf  
Pacific Bell  
140 New Montgomery Street, Room 1522A  
San Francisco, California 94105

Lisa M. Zaina, General Counsel  
OPASTCO  
21 DuPont Circle, NW, Suite 700  
Washington, DC 20039

Clifford K. Williams  
AT&T Corp.  
295 North Maple Avenue, Room 3244J1  
Basking Ridge, New Jersey 07920

Richard S. Whitt, Anne F. La Lena  
WORLDCOM, Inc.  
1120 Connecticut Avenue, NW  
Suite 400  
Washington, DC 20036

Mary McDermott, Linda Kent  
United States Telephone Association  
1401 H Street, NW  
Suite 600  
Washington, DC 20005

Alan J. Gardner, Jennifer A. Johns  
California Cable Television Assoc.  
4341 Piedmont Avenue  
Oakland, California 94611

John T. Scott, III  
Bell Atlantic NYNEX Mobile, Inc.  
c/o Crowell & Morning  
1001 Pennsylvania Avenue, NW  
Washington, DC 20005-2595

Andrew D. Lipman, Mark Sievers  
MFS Communications Company, Inc.  
c/o Swidler & Berlin, Chartered  
3000 K. Street, NW, Suite 300  
Washington, DC 20007

Jay C. Keithley  
Sprint Corporation  
1850 M Street, NW, 11th Floor  
Washington, DC 20036-5807

Time Warner Comm. Holdings Inc.  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20036

Mark C. Roseblum, Roy E. Hoffinger  
AT&T Corp.  
295 North Maple Avenue, Room 3244J1  
Basking Ridge, New Jersey 07920

J. Manning Lee  
Vice President, Regulatory Affairs  
Teleport Communications Group, Inc.  
Two Teleport Drive, Suite 300  
Staten Island, New York 10311

Loretta J. Garcia  
Donald J. Elardo  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

Danny E. Adams, Steven A. Augustino  
The Competitive Telecommunications Association  
c/o Kelley Drye & Warren  
1200 19th Street, NW, Suite 500  
Washington, DC 20036

Robert Mitchell  
U.S. Intelco Networks, Inc.  
P. O. Box 2909  
Olympia, Washington 98507

Paul Glist, John C. Dodge, Christopher W. Savage  
Jones Intercable  
c/o Cole, Raywid & Braverman  
1919 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

Jeffrey S. Linger  
Personal Communications Library Association  
c/o Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Gene P. Belardi, Vice President  
MobileMedia Communications, Inc.  
1800 E County Line Rd, #300  
Ridgeland, MS 39157-1916

NASUCA  
j Pennsylvania Office of Consumer Advocate  
Philip F. McClelland  
555 Walnut St. 5th Floor, Forum Place  
Harrisburg, PA 17101-1923

Richard McKenna  
GTE Service Corporation  
P. O. Box 152092  
Irving, Texas 75015-2092

Donna M. Roberts  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

William R. Maurer  
Perkins Coie LLP  
One Bellevue Center, Suite 1800  
411 - 108th Avenue, NE  
Bellevue, Washington 98004

Robert C. Schoonmaker  
Vice President  
Teleport Communications Group, Inc.  
GVNW La Montana Way  
Colorado Springs, Colorado 80918

Richard A. Askoff  
National Exchange Carrier Association  
100 South Jefferson Road  
Whippany, New Jersey 07981

Mark J. O'Connor  
Omnipoint & Marbury, LLP  
1200 19th Street, NW  
Washington, DC 20036

Mary W. Marks  
Southwestern Bell Telephone Co.  
One Bell Center  
Room 3558  
St. Louis, Missouri 63101

Donna N. Lampert, Charon J. Harris  
California Cable Television Assoc.  
c/o Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, P.C.  
701 Pennsylvania Avenue, NW, Suite 900  
Washington, DC 20004

Daniel L. Brenner  
National Cable Television Assoc.  
1724 Massachusetts Avenue, NW  
Washington, DC 20036

Richard M. Rindler, Morton J. Posner  
Russell M. Blau, Eric J. Branfman  
Swidler & Berlin, Chartered  
3000 K Street NW, Suite 300  
Washington, DC 20007

Gail L. Polivy  
GTE Service Corporation  
1850 M Street, NW  
Washington, DC 20036

Karen Potkul  
NEXTLINK California L.L.C.  
1924 Deere Avenue  
Santa Ana, California 72705

Sandra K. Williams  
Sprint Corporation  
P. O. Box 11315  
Kansas City, Missouri 64112

Teresa Marrero  
Teleport Communications Group  
Two Teleport Drive, Suite 300  
Staten Island, New York 10311

Halprin Temple Goodman & Maher  
555 12th Street NW, #950 North  
Washington, DC 20004-1200

Camille Stonehill  
State Telephone Regulation Report  
1101 King Street, Suite 444  
Alexandria, Virginia 22314

John P. Fons, J. Jeffrey Wahlen  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, Florida 32302

Telecommunications Report  
1333 H Street, NW - 11th Floor  
West Tower  
Washington, DC 20005

W. Scott Randolph  
Verizon Communications  
1300 I Street, Suite 500E  
Washington, DC 20005