

Case Scheduling/Rescheduling Advice

11/05/1998

To: <input type="checkbox"/> Commissioner Deason <input type="checkbox"/> Commissioner Clark <input type="checkbox"/> Commissioner Garcia <input type="checkbox"/> Commissioner Jacobs <input checked="" type="checkbox"/> Executive Director <input checked="" type="checkbox"/> Public Information Officer	<input checked="" type="checkbox"/> Deputy Ex. Director/Technical <input checked="" type="checkbox"/> Appeals Director <input checked="" type="checkbox"/> Legal Director <input checked="" type="checkbox"/> Auditing & Financial Analysis Director <input checked="" type="checkbox"/> Communications Director <input checked="" type="checkbox"/> Consumer Affairs Director	<input type="checkbox"/> Electric & Gas Director <input checked="" type="checkbox"/> Records & Reporting Director <input checked="" type="checkbox"/> Research Director <input type="checkbox"/> Water & Wastewater Director <input checked="" type="checkbox"/> Court Reporter <input checked="" type="checkbox"/> Staff Contact - L ILERI
---	---	--

From: Office of Chairman Julia L. Johnson

Docket No. 981444-TP

Title: Number Utilization Study: Investigation
into Number Conservation Measures.

1. Schedule Information

Event	Former Date	New Date	Location	Time
Staff Workshop		02/23/1999	Tallahassee, 148	09:30-14:00

Remarks: Involves docket(s) 981444-TP Note: The previous notice stated the DN incorrectly as 981114-TP.

2. Hearing/Prehearing Assignment Information:

Former Assignments

Hearing

Commissioners						Hrg. Exam.	Staff
ALL	JN	DS	CL	GR	JC		

New or Changed Assignments

Commissioners						Hrg. Exam.	Staff
ALL	JN	DS	CL	GR	JC		

Prehearing
Officer

Commissioners					
JN	DS	CL	GR	JC	ADM

Commissioners					
JN	DS	CL	GR	JC	ADM

Reason for Reassignment: 1. Unavailability 2. Good Cause 3. Recused 4. Disqualified

Comments: Document ID is 98144401.CCS

Case Assignment and Scheduling Record

Section 1 - Division of Records and Reports (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to: _____
 ("() " indicates OPR) _____

ADM AFA APP CAF (CMU) EAG GCL LEG RAR RRR WAW
 _____ X _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri

Staff Counsel W Cox

OCRs () _____

 () _____

 () _____

 () _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770
 Current CASR revision level**

1

Due Dates

Previous Current

1. Staff Recommendation	NONE	07/15/1999
2. Agenda - Regular	NONE	07/27/1999
3. PAA Order	NONE	08/09/1999
4. Close Docket or Revise CASR	NONE	09/09/1999
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 06/11/1999

Initials: OPR _____
 Staff Counsel _____

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	GR	DS	CL	JN	JC		
X							

- Prehearing Officer

Commissioners					ADM
GR	DS	CL	JN	JC	
	X				

Where panels are assigned the senior Commissioner is Panel Chairman;
 the identical panel decides the case.
 Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: [Signature]
 Date: Pending 6/22/99

C

Case Assignment and Scheduling Record

Section 1 - Division of Records and Reporting (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to:
 ("() " indicates OPR)

ADM AFA APP CAF (CMU) EAG GCL LEG RAR PAI WAW
 _____ _____ _____ _____ X _____ _____ X _____ _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri

Staff Counsel D Caldwell

OCRs () _____

 () _____

 () _____

 () _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770
 Current CASR revision level**

Due Dates

Previous Current

1. Staff Recommendation	08/05/1999	09/23/1999
2. Agenda - Regular	08/17/1999	10/05/1999
3. PAA Order	08/30/1999	10/18/1999
4. Close Docket or Revise CASR	09/30/1999	11/18/1999
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 07/28/1999

Initials: OPR _____
 Staff Counsel _____

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	GR	DS	CL	JN	JC		
X							

- Prehearing Officer

Commissioners					ADM
GR	DS	CL	JN	JC	
	X				

Where panels are assigned the senior Commissioner is Panel Chairman;
 the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: [Signature]

Date: Pending 8/16/99

Section 1 - Division of Records and Reporting (RAR) Completes

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Expiration: _____

ADM	AFA	APP	CAF	(CMU)	EAG	GCL	LEG	RAR	PAI	WAW
---	---	---	---	X	---	---	X	---	---	---

Time Schedule

Staff Assignments

Due Dates

	5
--	---

1. Staff Workshop	NONE	10/20/1999
2. Staff Recommendation	09/23/1999	12/09/1999
3. Agenda - Regular	10/05/1999	12/21/1999
4. PAA Order	10/18/1999	01/10/2000
5. Close Docket or Revise CASR	11/18/1999	02/10/2000
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Full Commission X Commission Panel _____
Hearing Examiner _____ Staff _____

Initials: OPR _____
Staff Counsel _____

Assignments are as follows:

- Prehearing Officer

Commissioners					ADM
GR	DS	CL	JN	JC	
	X				

Approved: SS/m
Date: Pending 9/23/29

Section 1 - Division of Records and Reporting (RAR) Completes

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Expiration: _____

ADM	AFA	APP	CAF	(CMU) X	EAG	GCL	LEG X	RAR	PAI	WAW
-----	-----	-----	-----	------------	-----	-----	----------	-----	-----	-----

Time Schedule

Staff Assignments

WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
IT IS TENTATIVE AND SUBJECT TO REVISION.
FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770
Current CASR revision level

Due Dates

Previous	Current
----------	---------

() _____

Initials: OPR _____
Staff Counsel _____

6


1. Staff Recommendation
2. Agenda - Regular
3. PAA Order
4. Close Docket or Revise CASR
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.
- 16.
- 17.
- 18.
- 19.
- 20.
- 21.
- 22.
- 23.
- 24.
- 25.
- 26.
- 27.
- 28.
- 29.
- 30.
- 31.
- 32.
- 33.
- 34.
- 35.
- 36.
- 37.
- 38.
- 39.
- 40.

12/09/1999	02/03/2000
12/21/1999	02/15/2000
01/10/2000	03/06/2000
02/10/2000	04/06/2000

Assignments are as follows:

- Prehearing Officer

Commissioners					ADM
GR	DS	CL	JN	JC	
	X				

Approved: 
Date: 12/15/1999

Case Scheduling/Rescheduling Advice

Printed on 04/19/2000 at 10:34

Page 1 of 1

To: ☒ Commissioner Deason ☒ Deputy Executive Director/Technical ☒ Electric & Gas Director
☒ Commissioner Clark ☒ Appeals Director ☒ Records & Reporting Director
☒ Commissioner Jacobs ☒ Legal Director ☒ PAI Director
☒ Commissioner Jaber ☒ Auditing & Financial Analysis Director ☐ Water & Wastewater Director
☒ Executive Director ☒ Telecommunications Director ☒ Court Reporter
☒ Public Information Officer ☒ Consumer Affairs Director ☐ Staff Contact

From: Office of Chairman Joe Garcia

Docket Number: UNDOCKETED CASE

Docket Title:

1. Schedule Information

Event	Former Date	New Date	Location	Time
Special Agenda		05/05/2000	Tallahassee, Room 148	9:30 AM - 5:00 PM

2. Hearing/Prehearing Assignment Information

Former Assignments

Hearing Officers

Commissioners						Hearing Exam.	Staff
ALL	GR	DS	CL	JC	JB		

Current Assignments

Commissioners						Hearing Exam.	Staff
ALL	GR	DS	CL	JC	JB		
X							

Prehearing Officer

Commissioners					
GR	DS	CL	JC	JB	ADM

Commissioners					
GR	DS	CL	JC	JB	ADM

Reason for Revision: A. New Assignment 1. Unavailability 2. Good Cause 3. Recused 4. Disqualified 5. See Remarks

Remarks:

Special Agenda for DNs 981444 and 000288/289. DN 000288/289 will begin at 9:30 and DN 981444 will begin immediately following.

Sandy Moses

To: Jackie Edwards
Cc: Mary Macko
Subject: RE: DN 981444, Urgent

The prehearing officer has been changed to GR.

-----Original Message-----

From: Jackie Edwards
Sent: Wednesday, April 12, 2000 12:22 PM
To: Sandy Moses
Cc: Jorge Cruz-Bustillo; Carol Purvis
Subject: DN 981444, Urgent
Importance: High

Hello, Sandy! Jorge wants the prehearing officer for this docket to be Chairman Gr instead of Com. Deason. Please make the change as soon as possible. Thanks!

Place in CASR file.

SM

Case Scheduling/Rescheduling Advice

Last Revised 05/01/2000 at 16:18

Page 1 of 1

Printed on 05/01/2000 at 17:04

To:

<input checked="" type="checkbox"/> Commissioner Deason <input checked="" type="checkbox"/> Commissioner Clark <input checked="" type="checkbox"/> Commissioner Jacobs <input checked="" type="checkbox"/> Commissioner Jaber <input checked="" type="checkbox"/> Executive Director <input checked="" type="checkbox"/> Public Information Officer	<input checked="" type="checkbox"/> Deputy Executive Director/Technical <input checked="" type="checkbox"/> Appeals Director <input checked="" type="checkbox"/> Legal Director <input checked="" type="checkbox"/> Auditing & Financial Analysis Director <input checked="" type="checkbox"/> Telecommunications Director <input checked="" type="checkbox"/> Consumer Affairs Director	<input type="checkbox"/> Electric & Gas Director <input checked="" type="checkbox"/> Records & Reporting Director <input checked="" type="checkbox"/> PAI Director <input type="checkbox"/> Water & Wastewater Director <input checked="" type="checkbox"/> Court Reporter <input type="checkbox"/> Staff Contact
--	---	--

From: Office of Chairman Joe Garcia

Docket Number: 981444-TP

Docket Title: Number Utilization Study: Investigation into Number Conservation Measures.

1. Schedule Information

Event	Former Date	New Date	Location	Time
Special Agenda		05/05/2000	Tallahassee, Room 148	9:30 AM - 5:00 PM

2. Hearing/Prehearing Assignment Information

Hearing Officers

Former Assignments

Commissioners						Hearing Exam.	Staff
ALL	GR	DS	CL	JC	JB		

Current Assignments

Commissioners						Hearing Exam.	Staff
ALL	GR	DS	CL	JC	JB		
X							

Prehearing Officer

Commissioners					
GR	DS	CL	JC	JB	ADM

Commissioners					
GR	DS	CL	JC	JB	ADM
X					

Reason for Revision: A. New Assignment 1. Unavailability 2. Good Cause 3. Recused 4. Disqualified 5. See Remarks

Remarks: Items for DN 000288/289 were withdrawn from this Special Agenda.

Case Assignment and Scheduling Record

Section 1 - Division of Records and Reporting (AR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL)
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to:
 ("()") indicates OPR

ADM AFA APP CAF (CMU) EAG GCL LEG RAR PAI WAW
 X X

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri

Staff Counsel D Caldwell

OCRs ()

()

()

()

()

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 04/27/2000

Initials: OPR _____
 Staff Counsel _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770**

Current CASR revision level

8

Due Dates

Previous Current

1. Staff Recommendation	NONE	04/25/2000
2. Special Agenda	NONE	05/05/2000
3. Standard Order	NONE	05/25/2000
4. Close Docket or Revise CASR	04/06/2000	05/30/2000
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	GR	DS	CL	JC	JB		
X							

- Prehearing Officer

Commissioners					ADM
GR	DS	CL	JC	JB	
X					

Where panels are assigned the senior Commissioner is Panel Chairman;
 the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: sgm

Date: 04/27/2000

CSRA

C

Case Assignment and Scheduling Record

Section 1 - Division of Records and Report (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to:
 ("()") indicates OPR)

ADM AFA APP CAF (CMP) CMU EAG ECR GCL LEG PAI RAR RGO SER WAW
 _____ X _____ X _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri, C Bulecza-Banks

Staff Counsel D Caldwell

OCRs () _____

() _____

() _____

() _____

() _____

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 09/12/2000

Initials: OPR _____
 Staff Counsel _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770**

Current CASR revision level

11

Due Dates

Previous Current

1. Staff Recommendation	09/14/2000	10/05/2000
2. Agenda	09/26/2000	10/17/2000
3. Standard Order	10/16/2000	11/06/2000
4. Close Docket or Revise CASR	12/01/2000	10/01/2002
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	DS	JC	JB	BZ	XX		
X							

- Prehearing Officer

Commissioners					ADM
DS	JC	JB	BZ	XX	

Where panels are assigned the senior Commissioner is Panel Chairman:
 the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: JD/Sm

Date: 10/02/2000

Case Assignment and Scheduling Record

Section 1 - Division of Records and Report. (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL)
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
Last Day to Suspend: _____

Expiration: _____

Referred to:
("()" indicates OPR)

ADM AFA APP CAF (CMP) CMU EAG ECR GCL LEG PAI RAR RGO SER WAW
_____ X _____ X _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri, C Bulecza-Banks

Staff Counsel D Caldwell

OCRs ()

()

()

()

()

Recommended assignments for hearing
and/or deciding this case:

Full Commission X Commission Panel _____
Hearing Examiner _____ Staff _____

Date filed with RAR: 10/03/2000

Initials: OPR _____
Staff Counsel _____

WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
IT IS TENTATIVE AND SUBJECT TO REVISION.
FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770
Current CASR revision level

12

Due Dates

Previous Current

1. Staff Recommendation	10/05/2000	10/26/2000
2. Agenda	10/17/2000	11/07/2000
3. Standard Order	11/06/2000	11/27/2000
4. Close Docket or Revise CASR	12/01/2000	10/01/2002
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	DS	JC	JB	BZ	XX		
X							

If there panels are assigned the senior Commissioner is Panel Chairman:
he identical panel decides the case.
If there one Commissioner, a Hearing Examiner or a Staff Member is
assigned the full Commission decides the case.

- Prehearing Officer

Commissioners					ADM
DS	JC	JB	BZ	XX	

Approved: so/sm

Date: 10/13/2000 C

Case Assignment and Scheduling Record

Section 1 - Division of Records and Report; (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to:
 ("()") indicates OPR)

ADM AFA APP CAF (CMP) CMU EAG ECR GCL LEG PAI RAR RGO SER WAW
 _____ X _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri, C Bulecza-Banks

Staff Counsel D Caldwell

OCRs () _____

() _____

() _____

() _____

() _____

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 10/27/2000

Initials: OPR _____
 Staff Counsel _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770**

Current CASR revision level

13

Due Dates

Previous Current

1. Staff Recommendation	NONE	11/16/2000
2. Agenda	11/07/2000	12/05/2000
3. Standard Order	11/27/2000	12/26/2000
4. Close Docket or Revise CASR	12/01/2000	10/01/2002
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	DS	JC	JB	BZ	XX		
X							

- Prehearing Officer

Commissioners					ADM
DS	JC	JB	BZ	XX	

Where panels are assigned the senior Commissioner is Panel Chairman;
 the identical panel decides the case.
 Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: 20/Sm

Date: 11/01/2000

Case Assignment and Scheduling Record

Section 1 - Division of Records and Reporting (RAR) Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____

Expiration: _____

Referred to:
 ("()") indicates OPR)

ADM AFA APP CAF (CMP) CMU EAG ECR GCL LEG PAI RAR RGO SER WAW
 _____ X _____

Section 2 - OPR Completes and returns to RAR in 10 workdays.

Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri, C Bulecza-Banks

Staff Counsel D Caldwell

OCRs () _____

() _____

() _____

() _____

() _____

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with RAR: 08/31/2000

Initials: OPR _____
 Staff Counsel _____

**WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770**

Current CASR revision level

10

Due Dates

Previous Current

1. Motion for Variance filed by BellSouth	NONE	07/28/2000
2. Motion to Protest BellSouth by Ms. Arvantias	NONE	08/10/2000
3. Staff Recommendation	NONE	09/14/2000
4. Standard Order	NONE	09/26/2000
5. Close Docket or Revise CASR	NONE	12/01/2000
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	DS	JC	JB	BB	XX		
X							

- Prehearing Officer

Commissioners					ADM
DS	JC	JB	BB	XX	

Where panels are assigned the senior Commissioner is Panel Chairman;
 the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: 20 km

Date: 08/31/2000

Case Assignment and Scheduling Record

Section 1 - Bureau of Records and Hearing /ices Completes

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.
 Company: Alternative Local Exchange Telephone Companies (AL
Interexchange Telecommunications Companies (IXCs)
Local Exchange Telephone Companies (LECs)

Official Filing Date: _____
 Last Day to Suspend: _____ Expiration: _____
 Referred to: APP CAF CCA (CMP) ECR GCL LEG PAI RGO SER
 ("() " indicates OPR) _____ X _____ X _____

Section 2 - OPR Completes and returns to CCA in 10 workdays. Time Schedule

Program/Module A18

Staff Assignments

OPR Staff L Ileri, C Bulecza-Banks,
B Casey, S Cater
Staff Counsel P Christensen
OCRs ()
()
()
()
()
()

WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT.
IT IS TENTATIVE AND SUBJECT TO REVISION.
FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770
 Current CASR revision level

15

Due Dates

Previous Current

1. Staff Recommendation - 941 # Pooling	NONE	11/07/2001
2. Agenda - 941 # Pooling	NONE	11/19/2001
3. PAA Order - Close if No Protest - 941 # Pooling	NONE	12/11/2001
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		
31.		
32.		
33.		
34.		
35.		
36.		
37.		
38.		
39.		
40.		

Recommended assignments for hearing and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing Examiner _____ Staff _____

Date filed with CCA: 10/25/2001

Initials: OPR _____
 Staff Counsel _____

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg. Exam.	Staff
ALL	JC	DS	JB	BZ	PL		
X							

- Prehearing Officer

Commissioners					ADM
JC	DS	JB	BZ	PL	
				X	

Where panels are assigned the senior Commissioner is Panel Chairman: the identical panel decides the case.
 Where one Commissioner, a Hearing Examiner or a Staff Member is assigned the full Commission decides the case.

Approved: [Signature]
 Date: 10/25/2001

C

Section 1 - Bureau of Records Complete

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Alternative Local Exchange Telephone
Interexchange Telecommunications Com
Local Exchange Telephone Companies (

Official Filing Date: _____

Expiration: _____

Last Day to Suspend: _____

Referred to: _____

CCA	(CMP)	ECR	GCL	PIF	RCA	SCR	SGA
	X		X				

("C") indicates OPR)

Section 2 - OPR Completes and returns to CCA in 10 workdays.

Time Schedule

Program Module A18

WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT
 IT IS TENTATIVE AND SUBJECT TO REVISION.
 FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770

Staff Assignments

OPR Staff

J Maduro, C Beard
C Bulecza-Banks
B Casey, V Cordiano
C Holman, T Hunter
S Ollila

[16] Current CASR revision level

Due Dates

Previous Current

1.	Staff Recommendation	SAME	02/23/2006
2.	Agenda	SAME	03/07/2006
3.	PAA Order	SAME	03/27/2006
4.	Consummating Order if No Protest	SAME	04/20/2006
5.	Close Docket or Revise CASR	03/31/2006	05/31/2006
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			
26.			
27.			
28.			
29.			
30.			
31.			
32.			
33.			
34.			
35.			
36.			
37.			
38.			
39.			
40.			

Recommended assignments for hearing
 and/or deciding this case:

Full Commission X Commission Panel _____
 Hearing _____ Staff _____

Date filed with CCA: 02/13/2006

Initials OPR _____

Staff Counsel _____

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg Exam	Staff
ALL	ED	DS	AR	CT	TW		
X							

Prehearing Officer

Commissioners					ADM
ED	DS	AR	CT	TW	
X					

Where panels are assigned the senior Commissioner is Panel Chairman:
 the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
 assigned the full Commission decides the case.

Approved: _____

Date: 02/13/2006

Section 1 - Bureau of Records Complete

Docket No. 981444-TP Date Docketed: 10/29/1998 Title: Number Utilization Study: Investigation into Number Conservation Measures.

Company: Competitive Local Exchange Companies
Interexchange Telecommunications Com
Local Exchange Telephone Companies (

Official Filing Date: _____

Expiration: _____

Last Day to Suspend: _____

Referred to: _____

("O" indicates OPR)

CCA	(CMP)	ECR	GCL	PIF	RCA	SCR	SGA
	X		X				

Section 2 - OPR Completes and returns to CCA in 10 workdays.

Time Schedule

Program Module A18

WARNING: THIS SCHEDULE IS AN INTERNAL PLANNING DOCUMENT
IT IS TENTATIVE AND SUBJECT TO REVISION.
FOR UPDATES CONTACT THE RECORDS SECTION: (850) 413-6770

Staff Assignments

Due Dates

OPR Staff

J Maduro, C Beard
C Bulecza-Banks
B Casey, V Cordiano
C Holman, T Hunter
S Ollila

17 Current CASR revision level

Previous Current

1.	Standard Order	SAME	03/27/2006
2.	Close Docket or Revise CASR	05/31/2006	04/27/2006
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			
26.			
27.			
28.			
29.			
30.			
31.			
32.			
33.			
34.			
35.			
36.			
37.			
38.			
39.			
40.			

Recommended assignments for hearing
and/or deciding this case:

Full Commission X Commission Panel _____
Hearing _____ Staff _____

Date filed with CCA: 03/13/2006

Initials OPR _____

Staff Counsel _____

Section 3 - Chairman Completes

Assignments are as follows:

- Hearing Officer(s)

Commissioners						Hrg Exam	Staff
ALL	ED	DS	AR	CT	TW		
X							

Prehearing Officer

Commissioners					ADM
ED	DS	AR	CT	TW	
X					

Where panels are assigned the senior Commissioner is Panel Chairman:
the identical panel decides the case.

Where one Commissioner, a Hearing Examiner or a Staff Member is
assigned the full Commission decides the case.

Approved: ED/Date: 03/13/2006

From: Kay Flynn
To: Levent Ileri
Subject: fwd: new docket

====NOTE=====10/29/98==3:36pm=====

Levent, I am now setting up this "number utilization study" docket in CMS. A couple of questions and/or matters I wanted to mention:

1. We will add the names you've listed to the docket mailing list as interested persons, rather than parties.
2. Is this potentially going to affect all LECs and IXC's? If so, should we include them all on the mailing list? What about ALECs? And are there others?

Kay

Fwd=by:=Levent=Ileri==10/29/98==3:43pm=====

Fwd to: Kay Flynn

.....
Hi Kay,

Thank you for contacting me. The answers are:

- 1) The mailing list is for companies who are intersted. Generally, big companies are the most interested ones.
- 2) Yes, we should include the LECs and IXC's. The results of this study will affect anyone who does provide telephone services (including cellular phones). We will be holding 2 workshops in February (dates are not definite yet) to discuss some of the issues. In February also we will be holding an Internal Affairs. The subjects are a little bit similar, in terms of the way they work.

Please let me know if the answers do answer your questions. Thanks.

Levent Ileri

Fwd=by:=Kay=Flynn=====10/29/98==4:04pm=====

Fwd to: Levent Ileri

.....
Just one other: Should the ALECs be included?

Fwd=by:=Levent=Ileri==10/29/98==4:19pm=====

Fwd to: Kay Flynn

.....
I just talked with Will Cox and he said that yes we need to include the ALECs in the mailing list as well.

Fwd=by:=Kay=Flynn=====

Fwd to: Levent Ileri

.....
Will do. Thanks.

DOCUMENT NUMBER-DATE

05539 JUN 23 98

RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

November 4, 1998

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE
R. MICHAEL UNDERWOOD

98 NOV 5 AM 8:44

MAIL ROOM

RECEIVED-FPSC

98 NOV -5 AM 10:41

OF COUNSEL
CHARLES F. DUDLEY

RECORDS AND
REPORTING

GOVERNMENTAL CONSULTANTS:

PATRICK R. MALOY
AMY J. YOUNG



Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: Florida PSC Docket No. 981444-TP

Dear Ms. Bayo:

The undersigned represents TCG South Florida ("TCG"). TCG is interested in the above-referenced docket. Please provide copies of all notices, CASRs, orders, staff recommendations, pleadings and other documents filed, served or issued in the above-referenced docket to the following:

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302-0551
(850) 681-6788 (phone)
(850) 681-6515 (fax)

Thank you for your assistance in this matter.

Sincerely,

Kenneth A. Hoffman

KAH/rl

asblol 11-17-98

From: Levent Ileri
To: Kay Flynn
Subject: fwd: addition to 981444

===NOTE=====11/20/98=12:53pm=
CC: Will Cox
.....

Hi Kay,

I'd like to add AT&T of the Southern
States to the mailing list of Docket No
981444.

Thank you,

Levent Ileri

Fwd=by:=Kay=Flynn=====

Fwd to: Levent Ileri

.....
Will do.

added 11/20/98
ly



RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION

98 DEC 22 AM 8:49
MAIL ROOM

Florida Cable Telecommunications Association

Steve Wilkerson, President

December 21, 1998

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECORDS AND
REPORTING

98 DEC 22 PM 2:48

RECEIVED-TPSC

RE: Docket No. 981444-TP

Dear Ms. Bayo:

Copies of all future correspondence, notices, orders and other documents in the above-named proceeding should be addressed to:

Michael A. Gross
Florida Cable Telecommunications Association
310 N. Monroe Street
Tallahassee, FL 32301

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

MAG/mj

cc: All Parties of Record

Done
12/23/98

FOLEY & LARDNER
ATTORNEYS AT LAW
POST OFFICE BOX 240
JACKSONVILLE, FLORIDA 32201-0240
THE GREENLEAF BUILDING
200 LAURA STREET
JACKSONVILLE, FLORIDA 32202-3510
TELEPHONE (904) 359-2000
FACSIMILE (904) 359-8700

RECEIVED-PPSC

99 JAN 11 AM 9:30

RECORDS AND
REPORTING

FACSIMILE TRANSMISSION

Done
1/12/99

Total # of Pages 1 (including this page)

TO:	PHONE:	FAX #:
Public Service Commission		850/413-7118

From: Helen Todd for the Firm
Sender's Direct Dial: 904/359-2000
Date: January 7, 1999
Client/Matter No: 999100/0100
User ID No: 0749 (misc information)

950737
950984
950985
~~981444~~

MESSAGE:

Please be advised that Leah G. Cooper is no longer with the firm of Foley & Lardner, 200 Laura Street, Jacksonville, Florida. Further notices to Ms. Cooper at 904/359-8700 are unnecessary; however, please direct these notices VIA FAX to Mr. Domenic Altomare at 904/564-6001. Please call me at 904/359-2000 if you have questions or need further information. Thanks for your assistance to this matter.

If there are any problems with this transmission or if you have not received all of the pages, please call (904) 359-2000, extension 7307.

Operator:	Time Sent:	Return Original To:
		Helen Todd

CONFIDENTIALITY NOTICE: THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS NAMED ABOVE. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR ANY AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT YOU HAVE RECEIVED THIS DOCUMENT IN ERROR, AND THAT ANY REVIEW, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US BY MAIL. THANK YOU.

004.122749.1

100②

FOLEY & LARDNER

01/07/99 THU 17:34 TEL 904 359 8700

FLORIDA PUBLIC SERVICE COMMISSION - RECORDS AND REPORTING

Requisition for Photocopying and Mailing

Date 2/2/99

Number of Originals 2 Copies Per Original 2047

Requested By Robert W.

Item Presented

Agenda For (Date) _____ Order No. _____ In Docket No. _____

☒ Notice of WORKSHOP For (Date) 2/23/99 In Docket No. 98-1114

Other _____

Special Handling Instructions _____

Distribution/Mailing

Number	Distributed/Mailed To	Number	Distribution/Mailed To
<u>25</u>	Commission Offices		
<u>25</u>	Docket Mailing List - Mailed		
	Docket Mailing List - Faxed		

Note: Items must be mailed and/or returned within one working day after issue unless specified here:

Print Shop Verification

Job Number 25 Verified By Michael

Date and Time Completed 2/3 Job Checked For Correctness and Quality (Initial) _____

Mail Room Verification

Date Mailed 2/3 Verified By LLH

BEN E. GIRTMAN

Attorney at Law

1020 East Layfayette Street
Suite 207
Tallahassee, Florida 32301-4552

February 17, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 981444-TP - Number Utilization Study: Investigation into Number
Conservation Measures.

Dear Ms. Bayo:

Please remove my name from the mailing list in the above referenced docket.

Thank you.

Sincerely yours,



Ben E. Girtman

99 FEB 22 AM 9 20
MAIL ROOM
Telephone: (850) 656-3232
(850) 656-3233
Facsimile: (850) 656-3233

RECEIVED-PPSC
99 FEB 22 AM 11:12
RECORDS AND
REPORTING

Done 2/22/99

38/444

Jeff and Sue Etter7281 123rd Street North
Seminole, FL 33772

99-0030 JAN 26

Friday, January 22, 1999

Telephone - 813-392-6325

The Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850Sent Via Fax:
850-487-1716

Attn : Florida Public Service Commissioners
Joe Garcia - Chairman
Susan Clark - Commissioner
J. Terry Deason - Commissioner
Julia L. Johnson - Commissioner
E. Leon Jacobs, Jr. - Commissioner
Director Of Communications
Walter D'Haeseller

RECORDS AND
REPORTING

99 MAR -5 PM 12:08

RECEIVED-PPSC

Ref : Need For Additional Phone #'s

Dear Sir or Madam:

There has been a great deal of talk recently about the issue the of need for additional area codes in order to provide more telephone numbers. I recognize that there is a need for something to be done, but as a consumer it doesn't appear to me that the potential solutions have been thought through very well.

I am sure that there must be some reason why my solution won't work, but to date I haven't heard anyone say so. My proposed solution is very simple and I believe would provide most of the consumers that I know with a solution that they would find very palatable.

I believe that as consumers we want to have three digit area codes and seven digit telephone numbers. However, we also want kids phone lines, cellular phones, fax machines and data lines for our computers. The other thing that most consumers that I know would like is to be able to have as few phone numbers as is possible.

In order to address this problem, why not just add one digit to our existing seven digit phone numbers in order to accommodate all of these potential additional devices. By adding one digit to our existing seven digit numbers, I would be able to take care of 1 kids line (2nd voice line) three cellular phones, three beepers, on computer data line and one Fax line. For instance, take any number and make the seven digit phone

number the main telephone number for that customer. Then, by addition one additional digit, there could be the equivalent of 9 additional extensions for that customer. For example:

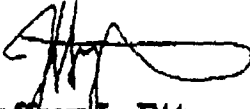
727-555-1212	Reserved For Wired Voice Line #1
727-555-1212 - 1	Reserved For Second Wired Voice Line #2 (e.g. kids)
727-555-1212 - 2	Reserved For Cellular #1
727-555-1212 - 3	Reserved For Cellular #2
727-555-1212 - 4	Reserved For Cellular #3
727-555-1212 - 5	Reserved For Beeper #1
727-555-1212 - 6	Reserved For Beeper #2
727-555-1212 - 7	Reserved For Beeper #3
727-555-1212 - 8	Reserved For Data
727-555-1212 - 9	Reserved For Fax

Under the above scenario, if we kept our existing seven digit telephone number of our main telephone number to our house, we would simply have to dial an 8th digit to reach any one of three cellular phones, three beepers, a fax, or a data line to a computer. Furthermore, this could be universal and if someone wanted to send me a fax (and I had one attached) they would know that all they had to do was add a 9 on the back of my regular telephone number.

I doubt that few, if any, people would ever have need for more than 10 telephone numbers. However, if they did, then they should be required to have a second telephone number, or which they would have an additional 10 possible combinations.

The proposed solution seems so simple. I hope that you might seriously evaluate my suggestion, in as much as it has made tremendous sense to virtually everyone that I have mentioned it to.

Thank you.


Jeffrey L. Etter
Seminole, FL

981444

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

March 5, 1999

Jeffrey L. Etter
7281 123rd Street North
Seminole, FL 33772

Re: Need for Additional Phone #'s

Dear Mr. Etter:

Thank you for your January 22, 1999 letter regarding the need for additional phone numbers. We truly appreciate your interest and concern. Your letter will be placed in the correspondence file for Docket No. 981444-TP (Number Utilization Study: Investigation into Number Conservation Measures).

Currently, the Florida Public Service Commission (FPSC) is conducting a major utilization study of all area codes in Florida in an attempt to determine whether numbering resources are being used in an efficient manner. A telephone number consists of an area code (NPA), a three-digit prefix (NXX) and a four-digit unique identification number (XXXX), in which X is any number from 0 to 9 (consisting of 10 numbers), and N is any number from 2 to 9. When a telecommunications carriers asks for numbers from the North American Numbering Plan Administration (NANPA), numbers are distributed at the XXXX level (i.e., 10,000 numbers). To discuss issues related number conservation measures such as rate center consolidation, 1000-block pooling, and 100-block pooling, a workshop was held on February 23, 1999 at the FPSC. Based on the outcome, the FPSC will be conducting a survey within two weeks.

An 8-digit dialing proposal, very similar to your suggestion, has been presented by others to be reviewed by the Federal Communications Commission. The FPSC has not heard about the outcome yet. However, the FPSC is always happy to hear from concerned customers, like you, regarding the better utilization of numbers.

We encourage you to send us any other suggestions that you might have in the future so that we can discuss these options with the industry in detail for feasibility reasons. If you have any additional questions, please feel free to contact me at (850) 413-6562. Thank you again for your interest in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Levent Ileri".

Levent Ileri
Engineer, Division of Communications

cc: Chairman's office
c:\ileri\accomplishments\941\jetter.li

ERVIN, VARN, JACOBS & ERVIN
ATTORNEYS AT LAW

THOMAS M. ERVIN, JR.
C. EVERETT BOYD, JR.
MELISSA FLETCHER ALLAMAN
ROBERT M. ERVIN, JR.
J. STANLEY CHAPMAN
DAVID R. WESTCOTT

305 SOUTH GADSDEN STREET
P.O. DRAWER 1170 (32302)
TALLAHASSEE, FLORIDA 32301
TELEPHONE (850) 224-9135
TELECOPIER (850) 222-9154

COUNSEL CONSULTANT
ROBERT M. ERVIN
OF COUNSEL
WILFRED C. VARN
RICHARD W. ERVIN
MARILYN K. MORRIS
JOSEPH C. JACOBS
(1923-1992)
LEROY COLLINS
(1908-1991)

March 24, 1999

VIA FACSIMILE
(850) 413-7118

Honorable Blanca S. Bayo
Director - Records and Reporting
Florida Public Service Commission
Room 110
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 981444-TF

Dear Ms. Bayo:

Please place my name on the mailing list for the referenced docket to receive all notices, orders and other communication from the Commission. Thank you for your assistance.

Sincerely,


C. Everett Boyd, Jr.

CEBJr/clp

RECEIVED-FPSC
99 MAR 24 PM 2:01
RECORDS AND
REPORTING

Done 3/24/99

**ERVIN, VARN, JACOBS, ODOM & ERVIN
ATTORNEYS AT LAW**

805 SOUTH GADSDEN STREET
POST OFFICE DRAWER 1170 (32302)
TALLAHASSEE, FLORIDA 32301

TELEPHONE: (850) 224-9135 • TELECOPIER: (850) 222-9164

**FACSIMILE TRANSMITTAL COVER SHEET
FROM RICOH 3200L**TO: Blanca S. Bayo DATE: March 24, 1999FROM: C. Everett Boyd, Jr., Esquire

Urgent: _____ Reply Requested: _____ For Your Information: X

TOTAL NUMBER OF PAGES: 2 (Including Cover)FAX PHONE: 413-7118

(For problems in receiving, call [850] 224-9135)

OPERATOR: CLP

THE PAGES COMPRISING THIS FACSIMILE TRANSMISSION CONTAIN CONFIDENTIAL INFORMATION FROM THE LAW FIRM OF ERVIN, VARN, JACOBS, ODOM & ERVIN. THIS CONFIDENTIAL INFORMATION IS INTENDED SOLELY FOR USE BY THE INDIVIDUAL OR ENTITY NAMED AS THE RECIPIENT HEREOF. IF YOU ARE NOT THE INTENDED RECIPIENT, BE AWARE THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO WE MAY ARRANGE TO RETRIEVE THIS TRANSMISSION AT NO COST TO YOU.

VERIFICATION: FACSIMILE COMPLETE _____ BY _____

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIAN JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 4/16/99

TO: Kenneth Hoffman
FROM: Amada Jago, DIVISION OF RECORDS AND REPORTING
RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A **CONFIDENTIAL DOCUMENT**
FILED IN DOCKET NO. 981444 OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING Response to data request, AND
(GENERAL DESCRIPTION)
FILED ON BEHALF OF Anonymous. THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR-19 (1/99)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIAN JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A C K N O W L E D G M E N T

DATE: 4/19/99

TO: Florida R. Self

FROM: Blanca S. Bayo, DIVISION OF RECORDS AND REPORTING

RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A **CONFIDENTIAL DOCUMENT**
FILED IN DOCKET NO. 781444-TP OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING Response to data request, AND
FILED ON BEHALF OF AT&T (GENERAL DESCRIPTION)
THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIAN N. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 5/10/99

TO: Kenneth Hoffman

FROM: Amarda Fazio, DIVISION OF RECORDS AND REPORTING

RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A **CONFIDENTIAL DOCUMENT**
FILED IN DOCKET NO. 981444 OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING NX Code info AND
(GENERAL DESCRIPTION)
FILED ON BEHALF OF Omniport THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

CMU/Ileri

MEMORANDUM

FPSC, CLK - CORRESPONDENCE
Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION:

May 6, 1999

TO: ☐ DIVISION OF APPEALS
☐ DIVISION OF AUDITING AND FINANCIAL ANALYSIS
☒ DIVISION OF COMMUNICATION
☐ DIVISION OF ELECTRIC AND GAS
☐ DIVISION OF RESEARCH
☐ DIVISION OF WATER AND WASTEWATER
☐ DIVISION OF LEGAL SERVICES

RECEIVED-FPSC
99 MAY 24 PM 3:34
RECORDS AND
REPORTING

FROM: DIVISION OF RECORDS AND REPORTING (SANDERS)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO: 05796-99 (x-ref DN 04870-99)

DESCRIPTION: Response to 3/22/99 data request of existing
and projected NXX Code utilization information.

SOURCE: Omnipoint Communications MB Operations, LLC

DOCKET NO: 981444-TP

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

☐ The document(s) is (are), in fact, what the utility asserts it (them) to be.

☐ The utility has provided enough details to perform a reasoned analysis of its request.

☒ The material has been received incident to an inquiry.

☐ The material is confidential business information because it includes:

- ☐ (a) Trade secrets;
- ☐ (b) Internal auditing controls and reports of internal auditors;
- ☐ (c) Security measures, systems, or procedures;
- ☐ (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company to contract for services on favorable terms;
- ☐ (e) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- ☐ (f) Tax returns or tax-related information;
- ☐ (g) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.

☐ The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.

☐ The material appears not to be confidential in nature.

☐ The material is a periodic or recurring filing and each filing contains confidential information.

Response prepared by: Levent Ileri
Date: 5/24/99

cc: ☐ RAR ☐ RCH
☐ CMU ☐ WAW
☐ EAG ☐ AFA
☐ LEG ☐ APP

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Number Utilization Study:)
Investigation into Number)
Conservation Measures.)
_____)

Docket No. 981444-TP

Filed: May 6, 1999

**OMNIPOINT COMMUNICATIONS MB OPERATIONS, LCC
d/b/a OMNIPOINT COMMUNICATIONS'
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications ("Omnipoint"), by and through its undersigned counsel, and pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification within twenty-one days of filing its Notice of Intent to Request Confidential Classification, and states:

1. Omnipoint requests that the document attached hereto as Attachment "A" be classified as "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes (1997). Attachment "A" is an edited version of the document on which the information asserted to be confidential has been blocked out by the use of an opaque marker. An unedited version of the information contained in Attachment "A" was submitted to the Division of Records and Reporting on April 16, 1999, together with Omnipoint's Notice of Intent to Request Confidential Classification for this document and is provided herewith under a separate cover marked "confidential" with the information asserted to be confidential highlighted in yellow.

2. The attached document contains existing and projected NXX Code utilization information for Omnipoint's operations in Florida. Omnipoint's current and projected utilization of NXX codes is "proprietary confidential business information" as contemplated by Section 364.183(3), Florida Statutes (1997), because such information is intended to be and is treated by

DOCUMENT NUMBER-DATE

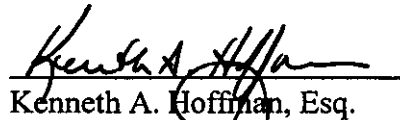
05795 MAY-6 99

FPSC-RECORDS/REPORTING

Omnipoint as highly sensitive, private and confidential information and the public disclosure of such information would cause harm to Omnipoint's competitive interests and business operations by enabling Omnipoint's competitors to analyze such information and gain knowledge concerning Omnipoint's market share and marketing strategy.

WHEREFORE, Omnipoint respectfully requests that the Commission issue an order declaring that the information reflected in the document attached hereto as Attachment "A" is proprietary confidential business information and exempt from disclosure under the public records laws of the State of Florida.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Kenneth A. Hoffman", is written over a horizontal line.

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Telecopier)

CERTIFICATE OF SERVICE

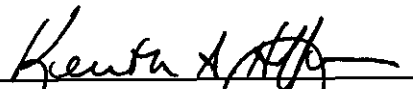
I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail this 6th day of May, 1999, to the following:

June McKinney, Esq.
Division of Legal Services
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Kimberly Caswell, Esq.
GTE Florida
P. O. Box 110
Tampa, FL 33601-0110

Charles Rehwinkel
Sprint
1313 Blairstone Road
FL TLHO 0107
Tallahassee, FL 32301

Nancy White, Esq.
c/o Nancy Sims
BellSouth Communications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

By: 
KENNETH A. HOFFMAN, ESQ.

CONFIDENTIAL

Company Name: Omnipoint Communications

Prepared by: Jeanette Rizzi

Tel:(973)872-5046 Fax: (973)872-5714

NPA (A)	Total Number of Telephone Numbers in Use for A by your company	Total Number of Carriers A	Total Number of NDC's your company has in A	Total Number of NDC's in Use for A by your company	Projected Average Growth per month for NDC's in A
305					
661					
954					

CONFIDENTIAL

ATTACHMENT "A"

DOCKET NOS. for Rhonda Merritt/ AT&T/ FAX 850-425-6361

✓ 920260
✓ 950737
✓ 950984
✓ 950985
✓ 960100
✓ 960786
~~990694~~
~~990694~~
~~990675~~
✓ 990649
✓ 990546
960833 - *closed*
✓ 971140
✓ 971492
980000B-SP-*closed*
✓ 980253
✓ 980498
✓ 981834
✓ 982015
990393- *closed*
✓ 990520 - ~~990520~~ *closed*
✓ 990546
✓ 990373
950778 - *closed*
~~971629~~
~~980435~~
✓ 980569
~~980986~~
~~981144~~
~~990137~~
✓ 990206
990223- *closed*
~~990255~~
~~990310~~
✓ 990342
~~990362~~
✓ 990375
~~990433~~
~~990456~~
~~990532~~
~~990577~~
~~990587~~
~~990592~~

Done 6/04/99

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 22, 1999
TO: DIVISION OF RECORDS AND REPORTING
FROM: DIVISION OF COMMUNICATIONS (ILERI) *h*
RE: DOCKET NO. 981444-TP - In re: Number Utilization Study:
Investigation into Number Conservation Measures.

RECEIVED-FPSC
99 JUL 23 PM 4:53
RECORDS AND
REPORTING

Attached is a **RESPONSE** to Mr. Gilbert Yablon's fax and letter to be filed on the correspondence side in the above-referenced docket. In addition, the **FAX** and **LETTER** are also attached.

LI
Attachments
cc: Division of Legal Services (Cox)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR..



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

July 22, 1999

Gilbert Yablon
21914 Dumetz Road
Woodland Hills, CA 91364

Re: A simplified dialing system for overlaid area codes

Dear Mr. Yablon:

Thank you for recommending a new alternative for overlays. We truly appreciate your interest and concern with regard to area code relief plans.

The Florida Public Service Commission (FPSC), along with other state public utility commissions in the nation, faces an enormous burden in determining when, and in what form, to implement area code relief. The FPSC has expanded its resources to convene public service hearings and workshops and to plan for different area code relief plans depending upon the geographic structure of the region being considered. As the FCC notes in its June 2, 1999, Notice of Proposed Rulemaking, all state commissions inevitably bear the brunt of consumer dissatisfaction with whatever method of area code relief is chosen.

Currently, Florida has five area codes which are in extraordinary jeopardy and by the end of 1999, Florida would double its area codes unless certain number conservation measures are taken. The FPSC is working on ways to improve the utilization of telephone numbers in Florida. On April 2, 1999, the FPSC filed a petition before the FCC to get additional jurisdiction over numbering issues.

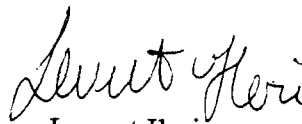
The FPSC, in its Docket No. 981444-TL (Number Utilization Study: Investigation into Number Conservation Measures) is investigating various number conservation measures. We placed

Mr. Yablon
Page 2
July 22, 1999

your simplified dialing system for overlaid area codes into this docket for further investigation when addressing area code relief plans.

If you have any questions, please contact me at (850) 413-6562.

Sincerely,

A handwritten signature in cursive script, appearing to read "Levent Ileri".

Levent Ileri
Engineer

C:\LERI\ACCOMPLA\GYABLON.LI

'The Unified Dialing Plan for Overlays'

A Dialing Plan which Supports the Implementation of Overlays for Area Code Relief

proposed by Gilbert Yablon

revised 5/25/97

The following plan describes a dialing system which supports the implementation of overlays for area code relief by eliminating the public's main objections to them. The plan preserves established dialing patterns to existing numbers, and unifies all levels of an overlay area with a consistent abbreviated dialing method. Long term relief is provided for exhausted area codes without impacting dialing in any other areas of the North American Numbering Plan (NANP).

This plan offers the following advantages over standard overlays:

- It greatly reduces the confusion and inconvenience that is associated with having multiple area codes within individual neighborhoods and households.
- Because the plan is non-disruptive to existing 7 digit and 1+10 digit dialing patterns:
 - > no one is put in jeopardy by a change to their local dialing plan (especially children),
 - > and it ensures that existing auto dialers can complete calls without reprogramming.
- It reduces the likelihood that the new overlay area code will be a stigma for new businesses.
- It ensures that costs to businesses and disruption overall will be kept to a minimum.

Defining these terms will be helpful for the discussions that follow:

<i>parent level of overlay</i>	the original area code (in these examples the 818 area code).
<i>child level of overlay</i>	a new overlaid area code (in these examples the 626 area code is the first <i>child level</i>).
<i>overlay area</i>	a single geographic area which contains the parent level and all of the child overlay levels.
<i>intra-overlay area calls</i>	refers to calls where the origin and the destination area codes both reside within the geographic overlay area.
<i>abbreviated dialing</i>	dialing which requires fewer than 11 digits to complete (abbreviated dialing within an area code is typically 7 digits).
<i>timing</i>	as used in this <i>Unified Dialing Plan</i> : an industry determined interval (probably 3 - 4 seconds) invoked after the 7th digit of a phone number is dialed. If this interval elapses and no further digits have been entered, the phone system switch will run an analysis on the 7 digit number that has been dialed. This technique will allow customers to dial valid phone numbers of varying lengths (7 or 8 digits).

In Brief:

I am proposing a method of implementing an overlay, in which local dialing within the overlay area is facilitated by:

- '7 digit' + timing dialing for intra-overlay area calls directed to the parent level of the overlay from any level of the overlay. This will ensure that dialing patterns to existing numbers (parent level numbers) will not be disrupted with the introduction of an overlay.
- '8 digit' (7 + suffix) dialing for intra-overlay area calls directed to any level of the overlay (parent or child). This would be a '7 + x' system, where the 8th digit is a suffix and acts as an overlay selector. Each area code within the overlay area will be assigned a unique identifier, which will then be used as the '8th digit suffix' or 'overlay selector' in dialing. This feature unifies all levels of the overlay area with consistent abbreviated dialing, regardless of the originating or destination overlay area codes.
- 1+10 digit dialing (permissive not mandatory) throughout the entire overlay area.

Refer to Fig. 4A at the end of this report for an illustration of how these three dialing methods are integrated in the Unified Dialing Plan for Overlays.

This plan is applicable to any area where an overlay might need to be implemented, but for ease of illustration I will describe it hypothetically using 818 as the original area code, and 626 as the first new 'overlaid' level.

How the plan would be implemented:

Within the overlay area only (example: the hypothetical 818/626 overlay area):

The suffixes for intra-overlay area dialing would be determined as follows:

- All 818 numbers would receive a suffix of '0' (representing the parent level).
- All 626 numbers would receive a suffix of '1' (representing the first child level).
- Any future overlay levels would receive a suffix of '2' - '9' in that order. This framework will allow for easy future expansion when more numbers are needed.

For example:

123-4567-0 = 1-818-123-4567	Within the 818/626 overlay area, either style is valid.
123-4567-1 = 1-626-123-4567	Within the 818/626 overlay area, either style is valid.
123-4567-2 = 1-???-123-4567	Within the 818/626/??? overlay area, either style will be valid (for a third area code).

Further:

- All 818 numbers can also be reached from any level of the overlay area simply by dialing the original 7 digit number + waiting for a short timing delay. This feature of the Unified Dialing Plan makes the introduction of an overlay completely non-disruptive to the existing dialing patterns of the original area code.

For example:

123-4567+timing delay = 1-818-123-4567	Defaults to 818 + 7 digit number to accommodate existing dialing patterns. <u>The industry would determine the appropriate length for this timing delay.</u>
--	---

From within the overlay area, the dialing plan would operate as follows:

- Once 7 digits are received, the call will be considered legal, however the system will wait an additional timing period (to be determined by the industry) for a possible 8th digit which technically is the 'overlay selector'.
- If 8 digits are received, the phone system switch will run an analysis on the number, examining the 8th digit first.
- If the 8th digit is a '0', the call will be directed to the 818 level of the overlay.
- If the 8th digit is a '1', the call will be directed to the 626 level of the overlay.
- If the industry determined 'timing delay' elapses before the 8th digit is received, a suffix of '0' is assumed, and the 7 digit call will automatically be directed to the 818 level of the overlay.
- If an industry determined 'timing delay' elapses and less than 7 digits have been received, the call is considered abandoned, and the standard 'try again' message is given.
- Once the proper overlay level is determined and the call is routed to the proper area code within the overlay area, the suffix is discarded, leaving a standard 7 digit number to be routed by traditional 7 digit switching logic.
- To summarize, all '7 digit + timing' or '7 digit + suffix' calls are converted to 1+10 numbers by the phone system, and are then transparently routed to the proper overlay level.

Note: 1 + 10 digit dialing for intra-overlay area calls would also be supported, if that were how people preferred to dial, but it would not be mandatory.

Handling local or toll calls going outside the 818/626 overlay area:

Mandatory 1 + 10 digit dialing would be used for dialing to any number outside of the 818/626 overlay area, whether it be local or toll. If someone in the overlay area were to accidentally use the '1 + 10 + x' format (because they had become accustomed to dialing 8 digit phone numbers) it wouldn't matter because in 1 + 10 dialing, all extra digits beyond 1+10 are ignored, just as it has always been.

Handling local or toll calls coming into the 818/626 overlay area:

When calling from outside 818/626, standard 1 + 10 digit dialing would be used to dial to any number inside the 818/626 overlay area. If someone from outside the 818/626 overlay area were to accidentally use the '1 + 10 + x' format (because they were unclear as to the correct dialing rules in the overlay area) it wouldn't matter because in 1 + 10 dialing, all additional digits are ignored.

Directory listings:

In the 818/626 telephone directories the numbers will be listed as follows:

legend:		7 digit + '0' = 818 area code	7 digit + '1' = 626 area code
818 number	999-3360-0		
626 number	956-2200-1		
213 number	213-462-2110		out of 'overlay area' number
626 number	347-9426-1		
818 number	883-6234-0		
818 number	830-9339-0		
818 number	982-7417-0		
626 number	889-4509-1		
310 number	310-244-0177		out of 'overlay area' number

Because no area codes would need to be listed for intra-overlay area phone numbers, the 'new' 626 numbers (which a new business might have) will not stand out as red flags to customers looking for experienced services. Only out of 'overlay area' phone numbers would stand out, the same as they already do in current directories.

To further remind people how the system works, a sticker could be supplied to customers in the 818/626 area that said:

8 digit dialing supported:
7 digit phone number + 0 = 818 area code
7 digit phone number + 1 = 626 area code

How to inform the public on how to use the new plan:

On and after the date that the overlay plan is to take effect:

For calls made from any telephone within the 818/626 overlay area:

- **to any phone number in the 818 area code overlay level (the parent level of the overlay area):**
You may dial all 818 area code telephone numbers exactly as you always have in the past using just 7 digits. After a short delay your call will go through.
You may avoid this delay by dialing the 7 digit number + 0.
- **to any phone number in the 626 area code overlay level (the first child level of the overlay area):**
You must dial all new 626 area code telephone numbers as the 7 digit number + 1.
- **to phone numbers in area codes outside of the 818/626 overlay area:**
Dial 1 + area code + 7 digits – the same as you would before the overlay went into effect.

For calls made from area codes outside of the 818/626 overlay area:

- **to any area code within the 818/626 overlay area:**
Dial 1 + area code + 7 digits – the same as you would before the overlay went into effect.

Conclusion:

This plan addresses customers' objections to using overlays which they fear would result in confusion and/or the inconvenience of having to dial 11 digits just to call across the street.

To ease the public's transition to overlays, simple 7 digit dialing to all existing parent level numbers is maintained (this is also a benefit for children and automatic dialing systems).

The plan allows for abbreviated '7 digit + suffix' dialing from and to any phone within the entire overlay area, without affecting how 1 + 10 digit calls out-of, into, or within the overlay area are handled. It is expandable to 10 levels (0-9) of overlay within a single geographic dialing area, allowing for painless addition of many new numbers in the future.

Additionally, the new style of directory listings won't be a disadvantage for new businesses.

For the public, this plan will have the psychological appeal of being a new 'high tech' solution to the challenges presented by splits and standard overlays. It answers all of the public's concerns about overlays, and will leave citizens and businesses with a feeling that something is finally being done to protect them from the expense and disruption that traditionally comes with area code exhaust and relief.

When the advantages of this plan are weighed against the disadvantages of area code splits and standard implementations of overlays (expense, disruption, confusion, inconvenience, permanent impact on the size of geographic dialing areas, etc.), this uniform dialing plan for overlays clearly makes sense as a solution for both the short and the long term.

This system can be applied to any area that is faced with the need to introduce an overlay. If this system becomes a standard, over time large areas of North America would be able to locally take advantage of this plan without affecting how any 'out of area' or 'into area' dialing and switching is handled.

Illustrations:

Using the 818/626 area code as an example, the attached diagrams illustrate how dialing patterns are impacted by various forms of area code relief.

- *Figure 1A* shows the established dialing patterns in an area code prior to implementing relief.
- *Figure 2A* shows how an area code split disrupts established dialing patterns.
- *Figure 3A* shows how a standard overlay impacts established dialing patterns and how its overlay levels are not united by a distinctive dialing plan.
- *Figure 4A* shows that The Unified Dialing Plan for Overlays is non-disruptive to established dialing patterns AND unifies all levels of the overlay area with a simple 8 digit dialing system.

Submitted by:

Gilbert Yablon

The Unified Dialing Plan for Overlays

21914 Dumetz Rd.

Woodland Hills, CA 91364

818-999-1070-0 - (voice)

818-956-2200-0 - (alt. voice)

818-956-3298-0 - (fax)

Currently Existing Area Code

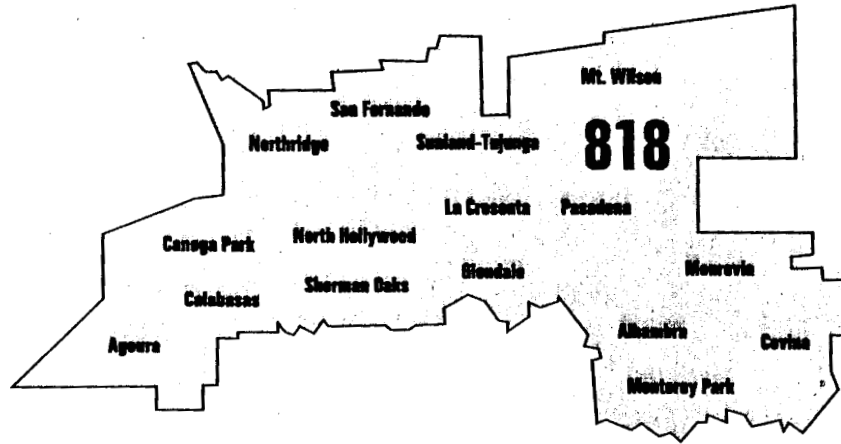


Fig.1: Communities Involved



Fig.1A: Dialing Patterns

Dialing Options

7 Digit Dialing
Within 818
123-4567



11 Digit Dialing
Into Area

→ **1+818+123-4567**

Out of Area

→ **1+NXX+123-4567**

This map shows the established dialing patterns of an area code before being impacted by area code relief. These dialing patterns will be disrupted by either a split or a standard overlay.

Approved Area Code Split [effective June 1997]

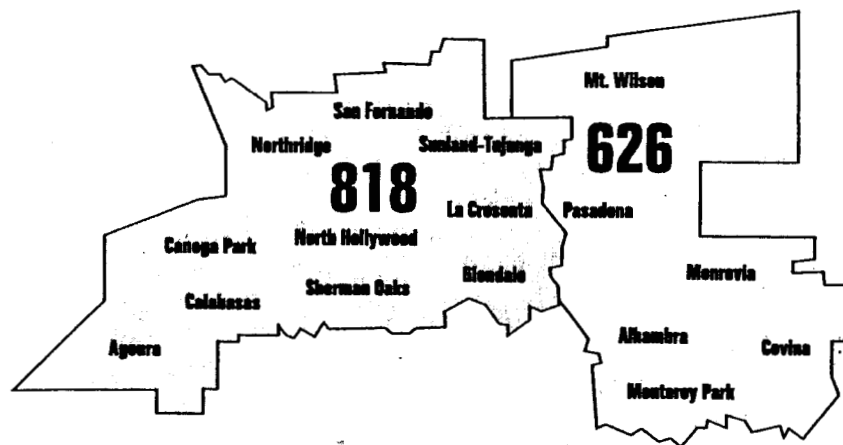


Fig.2: Communities Involved

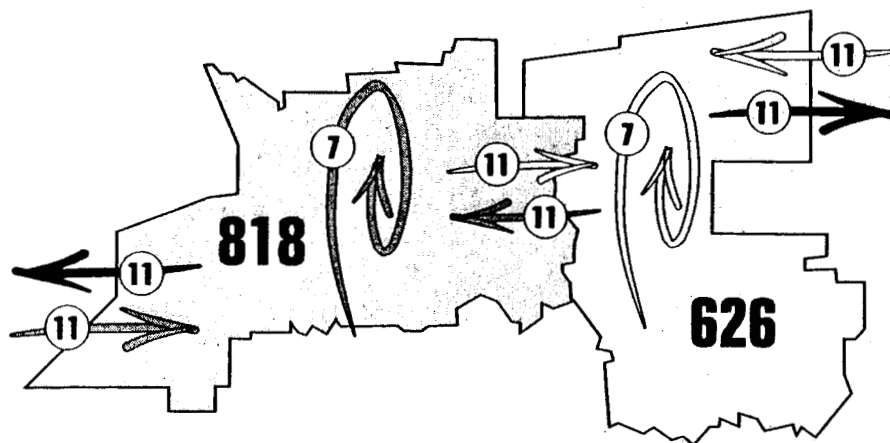


Fig.2A: Dialing Patterns

Dialing Options	
7 Digit Dialing	
	Within 818 123-4567
	or
	Within 626 123-4567
11 Digit Dialing	
	Into Area
	1+818+123-4567 1+626+123-4567
	Out of Area 1+NXX+123-4567
	Between 818/626
	1+818+123-4567 1+626+123-4567

Implementing a split greatly impacts dialing for calls both within and into the original NPA. This method of relief is expensive for business and disruptive to all customers, both within and outside of the affected area.

The Standard Overlay Method

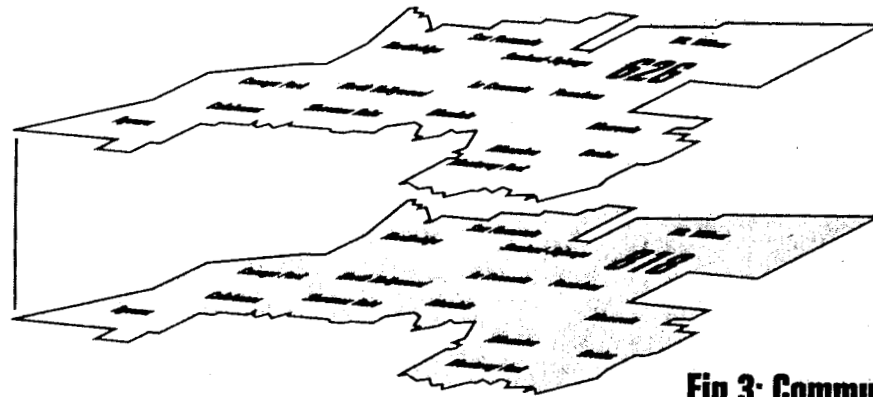


Fig.3: Communities Involved

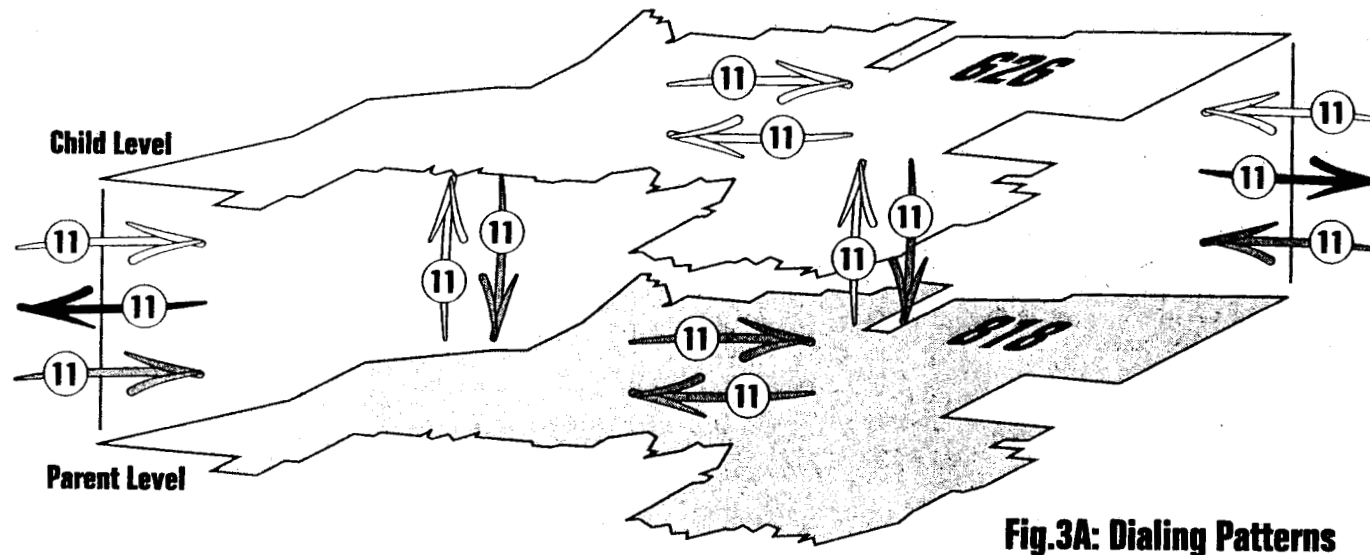


Fig.3A: Dialing Patterns

Dialing Options

7 Digit Dialing

Thought to be impractical for this Overlay Method

Mandatory 11 Digit Dialing

Into Area

→ 1+818+123-4567
→ or 1+626+123-4567

Out of Area

→ 1+NXX+123-4567

Within 818/626 Area

→ 1+818+123-4567
→ or 1+626+123-4567

With abbreviated dialing abandoned, the overlay levels are not unified by a distinctive dialing plan. The concern that this mix of area codes will cause hardship and confusion for citizens has prevented overlays from becoming widely accepted.

The Unified Dialing Plan for Overlays

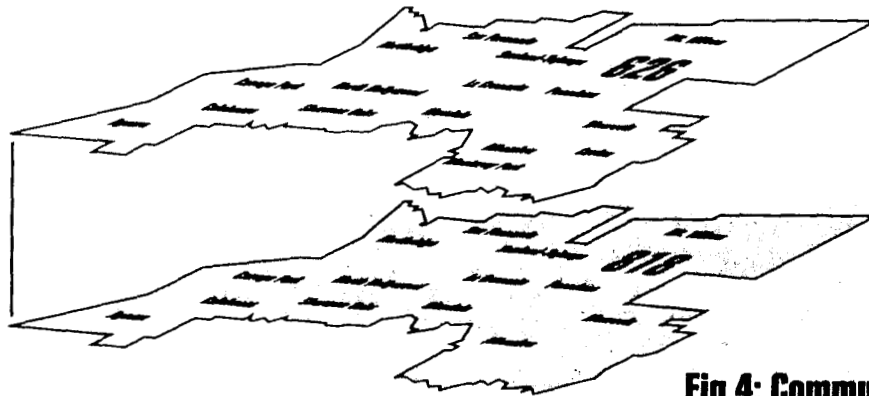


Fig.4: Communities Involved

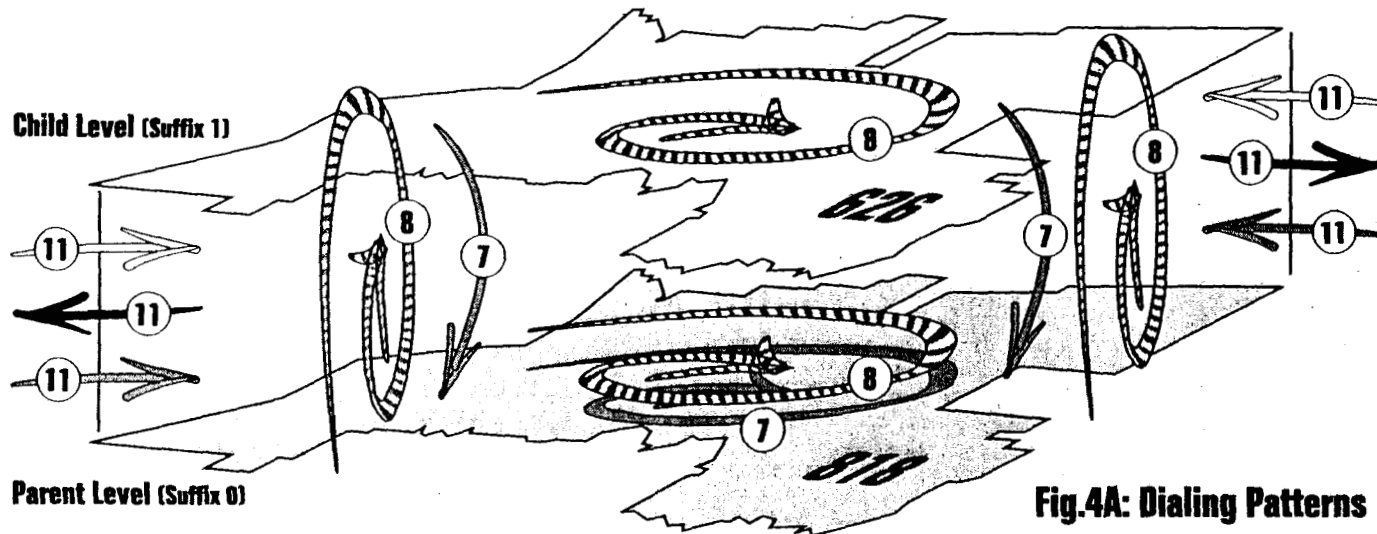
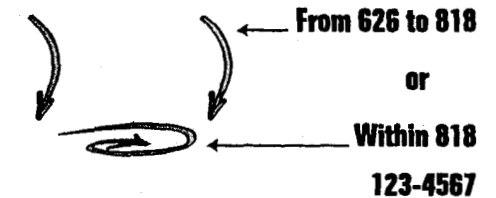


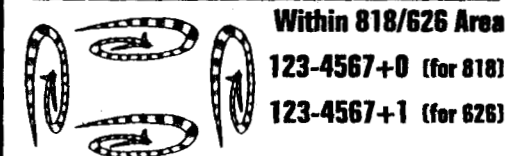
Fig.4A: Dialing Patterns

Dialing Options

7 Digit Dialing - Preserved (with timing)

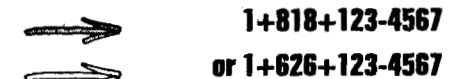


Unified - 8 Digit Dialing (7+X)



11 Digit Dialing

Into Area



Out of Area



Note: For Optional 11 Digit Dialing
Within 818/626 Area
Refer to Fig. 3A

This overlay method provides for long term relief AND maintains the integrity of the original dialing area by:

- 1) Preserving established 7 digit dialing to all parent level numbers from any level within the overlay area.
- 2) Unifying all levels of the overlay with a simple 8 digit (7+suffix) dialing system.
- 3) Allowing for optional (not mandatory) 11 digit dialing between levels of the overlay.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

Submitted to the INC on 7/13/98 by:

Gilbert Yablon
The Unified Dialing Plan for Overlays
21914 Dumetz Rd.
Woodland Hills, CA 91364

818-999-1070-0 - (voice)
818-956-2200-0 - (alt. voice)
818-956-3298-0 - (fax)
UNIFIEDdpo@aol.com - email

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

TABLE OF CONTENTS

	Page:
Introduction.....	1
What prompted development of the Unified Dialing Plan for Overlays?.....	1
What is the Unified Dialing Plan for Overlays?.....	2
Functionally, how does the UDPFO work?.....	2
Are you saying that customers in the original area code will be able to dial 7 digits to make calls, but people in the overlaid area codes will have to dial 8?.....	3
The UDPFO seems to offer a dialing advantage to customers in the "original" area code of the overlay - isn't that a violation of the FCC's mandate for dialing parity?.....	3
The UDPFO describes a 7 digit default dialing method which can only reach phone numbers in the original area code - isn't that a clear violation of dialing parity?.....	5
How can a plan like this be implemented locally (on a case by case basis) without interfering with, or requiring changes to, the rest of the telephone network?.....	6
Won't this system cause chaos among CPE manufactures? It seems like everyone would have to change equipment to accommodate this plan.....	7
Won't on demand features such as Auto Call Return, Busy Number Redial and other enhanced features be severely impacted by the need for additional digits?.....	7
Won't the increase in real time processor delay inherent in this plan have severe impacts on the existing public network and possibly have dire impacts in the future? I am concerned that any increase in call delay will stress the network and render ineffective the gains in efficiency the CCS/SS7 Network provides.....	7
Won't the non sequential digit analysis of this plan place undue delays in the provisioning of Local Number Portability?.....	8
Won't the post digit analysis cause a further increase in the time required to process a call?.....	8
The Federal Communication Commission and the California Public Utilities Commission require 10 digit dialing with an overlay of an area code. Further, the Industry Numbering Committee has endorsed 10 digit dialing as a standard, and it is expected that there will be a need to move beyond the 10 digit format arrangement in the future to possibly 12 digits. Doesn't this render the Unified Dialing Plan for Overlays unusable and unworkable?.....	8
Wouldn't any dialing plan change of this kind have to be agreed upon by the entire North American Telecommunications Industry?.....	8
What about the effect of this plan on Computer Telephony Integration (CTI) products such as computer software dialing programs, dial-in/dial-back security systems and credit card validation systems. Won't adaptation by the developer be required to accommodate this plan?.....	9
Won't the insertion of any delay in the completion of calls cause customer confusion, increase trouble reports and increase customer dissatisfaction?.....	9

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

Wouldn't this plan prompt a significant increase in wrong numbers? For example: I would hate to have the number in the original area code that corresponded to a cab company in the new area code. Every night at bar closing time I could get dozens (or hundreds) of calls from callers who dial 1 digit every 10 seconds and then slur their request for a cab and won't admit that they dialed a wrong number.....	9
My Public Utilities Commission has already examined the feasibility of using timing in other dialing scenarios, and has rejected it. Is the use of timing in this plan different? If so, what distinguishes timing in this plan from other attempts to implement it?.....	10
How well would this plan work for long distance calls? Customers would not be used to the new overlaid area code since they wouldn't have to dial it internally, and instead of dialing 1-732-949-1000 to get that number they are likely to dial 1-908-949-1000-1, prompting a wrong number. Won't this be problematic?.....	11
Does this plan offer a permissive dialing period?.....	12
Wouldn't a massive re-education campaign be required and need to be on-going since out-of-townners would not know about 8 digit dialing?.....	12
How would the translation be implemented by phone company equipment? Are you asking carriers to read the 8th digit and prefix, in the switch, to derive the correct area code?.....	13
How are things like the Dallas retroactive overlay handled? How about if the retroactive overlay was not done, but an overlay over two existing NPAs was done?.....	13
Won't problems arise from the fact that the number the customer knows is not the number that the customer is identified with in the PSAP (911) database?.....	14
Switches are set to look at an initial digit string. Wouldn't it be expensive to build the features necessary to do what the UDPFO suggests in looking at the first 3, plus the last 1 to determine the area code?.....	14
Things would get very interesting where digits had to be outpulsed to a PBX; this is done with a delete and prefix. Wouldn't this create a problem in a UDPFO scenario?.....	14
Won't some interesting (and expensive) recording and billing system changes be required by this plan?.....	14
Wouldn't there be lots of problems with getting people to do the timing reliably? It seems as though the failure cases would keep the PUC up at night with complaints.....	15
How does this plan fix the competitive issue? For instance: If I the CLEC get a code in the child NPA, folks need to do something special to get to my customers, i.e. dial that funky suffix or dial 1+10 digits. Won't this be a competitive disadvantage for my company?.....	15
Why should the industry take the time to give serious consideration to this plan?.....	15
UDPFO Conclusion.....	15
How to contact the UDPFO.....	16

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

Introduction:

The Unified Dialing Plan for Overlays (UDPFO) is a non-disruptive, consumer friendly, competitively neutral solution for area code relief. In addition to supporting all of the features found in standard overlay implementations, the plan offers an advanced 8 digit dialing system for overlay groupings, and is backward compatible with all established dialing patterns to existing pre-relief phone numbers. Some of the techniques and ideas offered in the plan involve "outside of the box" thinking, which has raised some initial concerns among regulators and telecom officials. However, a closer examination of the issues, and how this plan addresses them, will demonstrate that the UDPFO is workable, easy to use, and solves the problems that are typically associated with area code relief. The following discussion is offered as clarification to questions which have been asked about the plan.

What prompted development of the Unified Dialing Plan for Overlays?

Current solutions for area code relief (splits and standard overlays) create, rather than solve, problems for customers. Recently, the widespread use of these methods has resulted in what can readily be described as a "National Area Code Disaster." Our dialing landscape has been damaged, and this damage has been expensive and disruptive for businesses and consumers. Some of the impacts from current relief methods are outlined below.

Impacts from implementing an area code split:

An area code split forces half of the customers in the affected area to give up their existing phone numbers, cuts abbreviated (7 digit) dialing areas in half, and permanently disrupts established dialing patterns both within the affected area and into the affected area from everywhere else in the world. The overall cost just for mopping up after a single area code split is estimated to be over 40 million dollars (this includes updating signs and stationary, reprogramming of burglar alarms, fire alarms and other auto dialing systems, notifying customers and friends of number changes, modifying local phone switches, etc.). This reshuffling of phone numbers creates confusion for customers, resulting in numerous missed calls and misdiald phone numbers for many years to come.

Impacts from implementing a standard overlay:

Using standard overlays for relief also creates hardship for customers. Existing dialing patterns are disrupted for all customers in the affected area. Seven (7) digit abbreviated dialing is abandoned for less convenient (and very unpopular and controversial) 10 digit dialing. For all calls in a standard overlay scenario, the area code must be dialed before the 7 digit number, creating difficulty for customers -- especially children, handicapped persons and the elderly. Many people have expressed concern that dialing multiple area codes for calls within a single geographic region will create a feeling of disunity for the area. The shift from 7 digit to 10 digit dialing also necessitates reprogramming for all burglar alarms, fire alarms and other automatic dialing systems which had previously been programmed with 7 digit numbers. Incomplete calls will occur when 7 digits are dialed without the area code, and it is likely that the wrong area code will often be used by mistake (this happens today even where area codes are not overlaid). And, the likelihood of misdialing at least one out of 10 or 11 digits is significantly greater than when only 7 digits are dialed (expect an increase of 42% for 10 digits and 57% for 1+10 digits).

By disrupting established dialing patterns, area code splits and standard overlays cause hardship and confusion for customers, and prompt numerous misdials and wrong numbers.

It would be desirable if area code relief could be achieved with a minimum of disruption and expense. For a solution to be "preferred" it would have to satisfy both *the needs of the customer* and *the requirements of the telecommunications industry.*

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

For customers, a preferred solution would:

- 1) Be consumer friendly, non-disruptive and competitively neutral.
- 2) Allow customers to keep their existing area codes and phone numbers.
- 3) Preserve all dialing patterns to established phone numbers (backward compatibility).
- 4) Minimize impact on children, handicapped persons and the elderly.
- 5) Avoid costly reprogramming of existing burglar alarms, fire alarms and other auto-dialers.
- 6) Save consumers, businesses and telephone companies money overall.
- 7) Provide long term, non-disruptive relief to exhausted area codes.

For the telecom industry, a preferred solution must:

- 1) Offer benefit to customers.
- 2) Be competitively neutral.
- 3) Be technically workable.
- 4) Be cost effective to implement.
- 5) Be built on top of the existing network so that past investment is not discarded.
- 6) Limit all costs and changes in "dialing, switching and programming" to the geographic area in which the solution is implemented.

It would be hard to argue against an alternative which met these specifications, yet it is natural that controversy might surround it.

What is the Unified Dialing Plan for Overlays?

The Unified Dialing Plan for Overlays (UDPFO) is a non-disruptive solution for area code relief which is both competitively neutral and consumer friendly. It provides a technically workable alternative for area code relief which minimizes hardship to local business and the public.

New numbers can be added to a geographic area without changing the way that existing numbers are dialed. Established 7 and 1+10 digit dialing patterns are maintained and a new 8 digit option is enabled which allows for abbreviated dialing within and between all area codes in the geographic overlay area.

Further, the plan demonstrates how dialing parity (mandated by the FCC) can be maintained in an overlay without requiring the full 10 digit (or actually 1 + 10 digit) phone number to be dialed.

Many of the ideas presented in the UDPFO might, at first glance, seem to call upon techniques which previously (and for good reason) have been rejected by the Telecommunications Industry and Public Utilities Commissions. But a closer examination of the plan demonstrates that these techniques, as proposed here, solve rather than create problems.

The "customer concerns" and "competitive issues" which the plan addresses were derived directly from transcripts of public hearings on area code relief. After numerous discussions with telecommunications officials, followed by multiple redesigns of the plan, the UDPFO has been evaluated as "technically workable" by several industry experts (including a former co-chair of the Industry Numbering Committee). In addition, the cost of implementing the plan for an affected region may well be less than the overall cost (cost to business, cost to public and cost to telecom industry) of an area code split.

Functionally, how does the UDPFO work?

In brief, the Unified Dialing Plan for Overlays consists of a dialing system which:

- 1) Allows for optional (not mandatory) 1+10 digit dialing within and between all area codes in the geographic overlay area.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

- 2) Unifies all area codes in the geographic overlay area with a simple 8 digit (7+suffix) dialing system. The suffix represents one of ten possible overlaid area codes with '0' being the original area code, '1' being the first overlaid area code, '2' being a future second overlaid area code, etc. After the phone company's equipment receives the full 8 digits, it translates the number into a traditional 10 digit number (3 digit area code + 7 digit phone number) and passes it through the network as if the number had been originally dialed as 1+10.
- 3) Preserves established '7 digit style' dialing (see explanation below of how this default dialing is accomplished by using a 'timing delay') to all phone numbers in the original area code from any area code within the geographic overlay area.

Functionally the network switch will be looking for either 1+10 style numbers or 7+suffix style numbers. With default dialing, if only 7 digits are dialed, after an appropriate timing delay the switch will assume that '0' is the intended 8th digit and will put the call through to the original area code of the overlay area. In this way backward compatibility is achieved for dialing to 'pre-relief phone numbers' from any area code in the geographic overlay area, and the system appears completely non-disruptive to the customer.

It should be noted that while numbers in all of the area codes within the geographic overlay area can be reached by dialing either '7+suffix' or '1+10', the '7 digit default' dialing option (which always requires a timing delay) applies only to numbers in the original area code and only under default conditions. On the surface this would seem to offer preferential dialing to certain numbers, however, on closer examination it becomes clear that very few people would intentionally take advantage of this option. Because of the timing delay when only 7 digits are dialed, customers will quickly opt for dialing the 8th digit (in this case '0') in order to complete calls in the most expedient way. This 7 digit option is really only provided in order to ease the transition into an overlay scenario, and to act as a safety net for old "7 digit style" calls which would otherwise be lost. It provides an extremely long permissive dialing period, ensures that any phone number that had been dialed with 7 digits in the past could still be dialed the same way, and minimizes the need to immediately update auto dialers and databases. More than likely, (a short time after implementation of the UDPFO), 7 digit calls will only be initiated by auto dialers which had been programmed pre-relief (i.e. alarm system auto dialers) which are typically difficult or costly for their owners to update.

Are you saying that customers in the original area code will be able to dial 7 digits to make calls, but people in the overlaid area codes will have to dial 8?

No. Everyone can dial every number in the overlay area with 8 digits. Seven digit default dialing is also available to all customers for reaching numbers in the original area code. This feature is provided as courtesy to customers who already have phones and services in the original area code. It provides a way to not have to reprogram pre-relief auto dialers. When only 7 digits are dialed, after a significant delay the call will default through to the original area code. This is a safety net to catch 7 digit calls that would otherwise be lost.

The UDPFO seems to offer a dialing advantage to customers in the "original" area code of the overlay - isn't that a violation of the FCC's mandate for dialing parity in overlays?

While some numbers in the UDPFO can be dialed with only 7 digits, the conclusion that this offers a dialing advantage and violates parity is in error. Two factors mitigate this:

- 1) Everyone in a UDPFO grouping (from any area code in the grouping) can dial these same numbers with any of the three dialing options (7 digit default, 8 digit or 1+10 digit).

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

2) The timing delay which is always part of the 7 digit default option, counteracts any perceived dialing advantage. Customers will quickly migrate (from this inefficient 7 digit+delay method) to the plan's preferred 8 digit option. The 7 digit default is offered so that customers who already have an investment in the established dialing structure won't be disadvantaged by area code relief. Why would customers intentionally dial 7 digits and then waste several seconds, when they can simply dial one extra digit to avoid the delay? The default is only provided as a "safety net" to keep old style 7 digit calls (i.e. from alarm systems, auto dialers, and calls made under conditions of panic, emergency or lingering force of habit) from falling through the cracks.

A detailed discussion of the 7 digit vs. 8 digit issue follows

These questions should be asked: "What counts as a digit?" and/or "What length delay would be required before the 7 digit default is not seen as a dialing advantage?"

Would people really dial 7 digits and then wait 4 or 5 or 8 or 10 seconds just so they could avoid having to dial that "bothersome" 8th digit? In our fast paced society a 3 or 4 second delay should neutralize any perceived (or arguable) advantage that dialing only 7 digits provides.

In other words, how can a method of dialing which takes longer be considered to be a dialing advantage?

And, since everyone in the entire overlay area has equal access to the same dialing options that are available for reaching any specific number, how is this a disadvantage to anyone?

Other variations on overlay implementations which propose 7 digit dialing within individual area codes of an overlay but require 10 or 1+10 digits for dialing between those same area codes, do clearly violate of the FCC's mandate for dialing parity. In these scenarios, the dialing options for reaching any specific number are not equally available to all customers in the overlay area.

The Unified Dialing Plan for Overlays on the other hand, is in accord with the FCC mandate on parity. All of the area codes in the UDPFO are equally able to initiate calls with any of the options that are available for any specific number. There is no dialing advantage or disadvantage associated with either the original area code or any of the overlaid area codes. Customers from any area code within the geographic overlay area can dial the original area code with '7 digit default' (which always requires a timing delay) -- but why would they want to, when they can make the call more expediently by simply dialing it as an 8 digit number (7digits+'0') and thus avoid the delay?

The '7 digit default' option is provided so that there is no penalty to people who already have phones and services in the original area code; who would otherwise be forced to immediately change dialing habits, update auto dialers and reprogram 'alarm type' systems from '7 digit' to '8 digit' or '1+10 digit' dialing.

The preferred dialing method in the UDPFO is the 8 digit method. Any telephone within the overlay area can be dialed from any area code in the overlay grouping with this simple, efficient method. Customers in a UDPFO area would quickly migrate to 8 digit dialing in order to avoid the delay which is always part of 7 digit default.

It is hard to imagine that someone in the original area code would advise friends, relatives or customers that they should use the 7 digit default method just so that they can enjoy the advantage of their calls taking several seconds longer to connect. If this were the case, a strong argument could be made for reissuing rotary dial telephones.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

The following three examples further illustrate that there is no advantage to being in any particular area code in a UDPFO scenario:

Customer A:

This customer already has a phone in the original area code before the UDPFO is implemented. Because people had called Customer A with 7 digits in the past, there is a likelihood that he might still receive calls of this nature in the future because of: force of habit after years of people knowing and using his 7 digit number, and pre-programmed auto dialers that might not have been updated to 8 digit or 1+10 digit for this number. The UDPFO will keep these types of calls from falling through the cracks, allowing them to complete after a designated timing delay.

If the customer already has existing 7 digit numbers entered in his auto dialer, burglar alarm, fire alarm or other automated dialing system, the UDPFO offers another advantage over other forms of area code relief. Since all pre-relief dialing patterns to existing numbers are maintained by the UDPFO, customers will not be forced to immediately update these systems (although they may choose to in order to avoid the timing delay).

Customer B:

Looking for new service after UDPFO –this customer gets a number in the original area code. No one has ever used 7 digits to call this customer at this number, so there is no force of habit and no preprogrammed auto dialers that need to be updated for this number. This customer will be given his new number as (NXX) NXX-XXXX-0, and that is how he will tell people to call him. The ability to dial this number with 7 digits will not be expected or missed. More than likely if this number were dialed as only 7 digits it would be because it had been intended for a previous owner of that number.

Customer B will enjoy the same advantages as Customer A in terms of his own auto dialers. Any previously programmed devices the customer moves to this new number (from any area code in the grouping) will not need reprogramming.

Customer C:

Looking for new service after UDPFO –this customer gets service in the new overlaid area code. Same situation as Customer B above. This customer's number will be (NXX) NXX-XXXX-1. No one will have ever tried to dial this number with 7 digits in the past, and there is no reason or logic to why anyone would do it now. To any person dialing this number, the '1' suffix will be as much a part of this number as the 7th digit of a traditional number is today.

Customer C will enjoy the same advantages as Customers A and B in terms of his own auto dialers. Any previously programmed devices the customer moves to this new number (from any area code in the grouping) will not need reprogramming.

Customers A, B and C:

All will enjoy the same dialing advantages:

When calling someone in the original area code, they can all use 8 digit, 1+10 digit or 7 digit default (which always requires a delay).

When calling someone in the new overlaid area code, they can all use 8 digit or 1+10 digit.

The 7 digit default safety net offers an important advantage over other forms of area code relief: customers are not penalized or put in jeopardy by a change to their dialing plan. Area code splits and standard overlays do not offer this advantage.

The UDPFO describes a 7 digit default dialing method which can only reach phone numbers in the original area code - isn't that a clear violation of dialing parity?

Again, the 7 digit default 'safety net' feature of the UDPFO does not violate dialing parity.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

The most efficient method for dialing any number within the overlay grouping is the 8 digit option, and this method is available to all customers in the overlay area for dialing every number in the area.

The 7 digit default (which always requires a delay) is less efficient, but is provided to help minimize disruption to customers who already have phones and services in the original area code.

Clearly, if the less efficient 7 digits + delay method were the only option for reaching customers in the original area code (while all other area codes in the overlay group could be reached more efficiently by dialing 8 digits), the original area code would have an undeniable dialing disadvantage.

On the other hand, if the 7 digit default method is not provided, people who already have numbers in the original area code will suffer more disruption than people who later obtain service in either the new area code or the original area code.

I trust regulators will conclude that the intent and function of the 7 digit default is to minimize hardship for people who already have service, and that no "dialing advantage", or violation of "dialing parity" is generated by this feature.

How can a plan like this be implemented locally (on a case by case basis) without interfering with, or requiring changes to, the rest of the telephone network?

Although there will be a change in the way that numbers may be dialed (7 digits, 8 digits or 1+10 digits), once in the network all calls are handled as traditional 10 digit numbers, which is already the network standard in overlay situations. Because all calls are translated into 10 digits, the UDPFO is able to solve local dialing issues without affecting "dialing to" or "dialing from" any outside area codes. It can be adopted on a situation by situation basis, and would have no impact on dialing or switching for the rest of the telephone network.

To the network as a whole, a UDPFO implementation will look like a standard overlay grouping. Each of the area codes in the group will have telephone numbers that are known to the network as standard 3 digit area codes followed by standard 7 digit telephone numbers. The new suffix digit is only significant when dialing 7 or 8 digit numbers within the geographic overlay area. The 8th digit, when dialed, functions as an area code selector (or indicator) and is used by telephone company equipment to translate the number into a standard 3 digit area code + 7 digit telephone number. Outside of a UDPFO grouping, there will be no impact on the normal functioning of the network, because all dialing and switching into and out of the grouping will be done with industry standard 10 digit numbers (the same as the current standard for dialing across area code boundaries).

How to best integrate the UDPFO into the existing telephone network is really a matter for the industry to resolve, but I would like to suggest that there may be more than one approach worth considering. It was suggested to me (by a Lead Programmer for the Advanced Intelligent Network) that it might be relatively easy to implement this system if it were handled as a custom calling service. Though custom calling services are normally preceded by "*XX" ("star X X" -- like "star 69" for call return), wouldn't applying the following logic be able to automatically trigger the custom service without having to first dial the "*XX"? :

- 1) Since any calls beginning with a "0" or a "1" would not be of the 7 digit default or 8 digit (7+X) type, these calls could be released directly to the network without special handling.
- 2) The switch could then assume that any call (in a UDPFO area) which begins with "2" - "9",

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

might be a 7 or 8 digit call, and would automatically trigger the custom service for handling these types of calls -- eliminating the need for first dialing "*XX". The service would then "watch" as digits were entered, and "decide" what to do with any given number. Naturally 411, 911 and other special services would immediately be forwarded along after only 3 digits are entered. Seven (7) digit calls would not be released until after the timing delay, and both 7 and 8 digit calls would be translated into the proper 3 digit area code + 7 digit phone number before entering the network.

PLEASE NOTE: the above is only suggested as one possible way to implement the UDPFO, based on input from a Lead Programmer of the Advanced Intelligent Network for a major local service provider. There may be other, better ways of accomplishing the same thing, and the industry as a whole is welcome to make suggestions on this.

Won't this system cause chaos among CPE manufactures? It seems like everyone would have to change equipment to accommodate this plan.

No, that will not be the case. One of the main advantages of this plan is that it minimizes the impact on devices such as speed dialers, burglar alarms, and auto dialers because it eliminates the need to reprogram them when the numbers they have been set up to dial are split off into a new area code, or when 7 digit numbers need converting to 1+10 (as would be the case if a standard overlay were implemented). In most cases, a PBX or telephone key system would be unaffected by the UDPFO since the suffix logic is handled at the network switch level. At worst, a PBX software change might be necessary to allow the release of the 8th digit. This might actually be less disruptive to a PBX than the changes that are necessary after a traditional area code split. Any problems that are caused may well be less significant than those created by recent changes that have been made to the NANP, i.e. PBX problems caused by 2-9 being used for the second digit of an area code and 0-1 being used for the second digit of a prefix.

Won't on demand features such as Auto Call Return, Busy Number Redial and other enhanced features be severely impacted by the need for additional digits?

No. All 7 and 8 digit entries will be translated to 10 digit numbers before switching begins. Ten digits is the same protocol that phone numbers have been know to the network since the 1940's. It seems hard to imagine that there would be any impact on services that have already been designed to use 10 digit numbers.

Won't the increase in real time processor delay inherent in this plan have severe impacts on the existing public network and possibly have dire impacts in the future? I am concerned that any increase in call delay will stress the network and render ineffective the gains in efficiency the CCS/SS7 Network provides.

Any delay that would occur would happen prior to connection to the CCS/SS7 network and would have no impact on the efficiency of the CCS/SS7 network. The industry needs to define what the 'severe impacts on the existing public network' would be and provide some examples of 'dire impacts in the future'.

Also, as explained earlier, very few calls will actually be intentionally made using the '7 digit default' method -- which requires a delay. Most calls within the geographic overlay area will be initiated with the '7+suffix' method which avoids the delay. With traditional relief alternatives, a large number of calls that previously only required 7 digit dialing would afterwards require dialing 1+10 digits. A better question might be "how much stress is put on the network by the additional time

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

required to dial 1+10 digits after a split or a standard overlay is implemented?" It may very well be that the 7+suffix method of the UDPFO would result in an overall network time savings compared to 1+10 digit dialing. The network would save the time it takes for dialing those 3 extra digits.

Won't the non sequential digit analysis of this plan place undue delays in the provisioning of Local Number Portability?

As stated earlier nothing in what I am proposing changes the 10-digit format and therefore should have no impact on Local Number Portability. As currently proposed, Local Number Portability is simply intended to allow a customer to change his/her carrier without requiring a number change.

Won't the post digit analysis cause a further increase in the time required to process a call?

Answering this question will require a further analysis (by the industry) which should include the timing differences between the various dialing scenarios.

The Federal Communication Commission and the California Public Utilities Commission require 10 digit dialing with an overlay of an area code. Further, the Industry Numbering Committee has endorsed 10 digit dialing as a standard, and it is expected that there will be a need to move beyond the 10 digit format arrangement in the future to possibly 12 digits. Doesn't this render the Unified Dialing Plan for Overlays unusable and unworkable?

This plan introduces new ideas which challenge the necessity of using 1+10 digits in order to maintain dialing parity in an overlay situation. In the Unified Dialing Plan, dialing parity is provided with only 8 digits.

The INC's work in promoting uniform 10 digit dialing as a standard is to be applauded - it ensures that one method of dialing will work for all calls anywhere in the North American Numbering Plan. However, it does not exclude other local methods of dialing from co-existing with it. The UDPFO does transparently co-exist with 1+10 digit dialing.

The 12 digit format that is planned for the future does not necessarily render this plan unusable and unworkable. In addition, it is my understanding that Local Number Portability and other actions to conserve the existing resource should delay expansion until well into the next century. However, even with expansion, if thought is given to maintaining the same backward compatibility that the Unified Dialing Plan offers for overlays, this plan can very likely co-exist with a plan requiring any new number of digits.

Wouldn't any dialing plan change of this kind have to be agreed upon by the entire North American Telecommunications Industry?

Not necessarily. Because the changes that are required for this plan are isolated within the single area where it is being implemented, it does not have any effect on the industry as a whole. The beauty of this plan is that it solves local dialing issues and does not affect 'dialing to' or 'dialing from' any 'outside' area codes. It could be adopted on a situation by situation basis, and would have no impact on dialing or switching for the rest of the telephone network. Universal agreement would be great, but it is unnecessary for implementation of this local solution.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

What about the effect of this plan on Computer Telephony Integration (CTI) products such as computer software dialing programs, dial-in/dial-back security systems and credit card validation systems. Won't adaptation by the developer be required to accommodate this plan?

There should be no effect on CTI products since all numbers will still be known to the network as 10 digit numbers, and will be still be reported by network Caller ID type systems to telephony equipment as those same 10 digit numbers. Any device on the receiving end of a call would recognize the caller in the same way that it always has.

Won't the insertion of any delay in the completion of calls cause customer confusion, increase trouble reports and increase customer dissatisfaction?

Call completion delays will not be an issue. As stated before, the 8 digit option would be the preferred (or dominant) dialing method in a UDPFO scenario. The '7 digit default' dialing option (which does require the timing delay) is really only offered to facilitate transition to an overlay, and it eliminates the need to immediately reprogram auto dialers and alarm systems which can be extremely time consuming and expensive to the customer (especially businesses). In a short time customers will (on their own) start using the more expedient 8 digit option.

Wouldn't this plan prompt a significant increase in wrong numbers? For example: I would hate to have the number in the original area code that corresponded to a cab company in the new area code. Every night at bar closing time I could get dozens (or hundreds) of calls from callers who dial 1 digit every 10 seconds and then slur their request for a cab and won't admit that they dialed a wrong number.

It is interesting that you have cited this particular example. Does this imply that a drunk will always dial correctly unless he is dialing in a UDPFO scenario? In practice, all of the other solutions for area code relief will create similar or worse problems under the same conditions. After an area code split, will a drunk (or anyone for that matter) always remember which area code he is in, and what if any area code he needs to dial for his intended connection? After a standard overlay isn't it more likely that a person will have a harder time negotiating 10 or 11 digits, compared to only 8 which would be available for all numbers in a UDPFO grouping?

What about an emergency situation (after a split or a standard overlay where dialing patterns have been completely disrupted), and the emergency call does not go through because the dialer has panicked and can't remember the new way to dial a number that used to be valid with just 7 digits? The UDPFO provides a "safety net" for these types of calls, by preserving all existing dialing patterns, while the other methods of relief do not.

The potential for misdials exists for all methods of area code relief, but with the UDPFO there is less potential for disaster.

Yes, there may be a problem with misdials, but likely not any greater a problem than other forms of relief currently present, and with some creative problem solving, the likelihood of misdials could be minimized. Here are some thoughts I offer on how this might be addressed:

- 1) When the UDPFO overlay is first implemented, there will not be many numbers in the new area code (same as a standard overlay), so the chances of too short of a delay causing a misdial early on is very low. This might justify a relatively short timing delay at first implementation -- say 3 to 4 seconds. As the months go by -- if warranted by frequent misdials -- the delay could be gradually increased as the new area code gets more populated.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

- 2) Or, a few seconds after 7 digits have been entered, a recorded message could play that would give instructions on how to input the 8th digit -- "for 818 area code - enter 0, for 626 area code - enter 1 , " etc. After a few more seconds it might say "at the tone, your call will default to the 818 area code..... beep".
- 3) Or, if certain numbers were consistently misdialed, those numbers might be selectively blocked from 7 digit default dialing -- or people could request that they never receive any 7 digit default calls. This would not harm the functionality of the plan. These customers would still be able to dial with 7 digit default (protecting auto dialers, burglar alarms, fire alarms, etc.), but their own number would no longer be reachable that way.
- 4) Or, it could be that the 7 digit default method will only serve as a transition device during the first 6 months to 1 year of implementation. If misdials do become problematic, it could be phased out altogether. Though this would defeat the non-disruptive intent of the UDPFO, it would still leave the overlay area with a very functional and efficient 8 digit abbreviated dialing plan.
- 5) Or, on the other hand, there may turn out to be no problem, so none of these modifications would need to be made.

These are just a few suggestions -- they may or may not be easy to implement. The point is that there are many ways to address this potential problem -- if it turns out to be a problem at all.

My Public Utilities Commission has already examined the feasibility of using timing in other dialing scenarios, and has rejected it. Is the use of timing in this plan different? If so, what distinguishes timing in this plan from other attempts to implement it?

Yes, the way that timing is implemented in the UDPFO is different from other dialing scenarios.

Timing provides a method for dialing telephone numbers of varying length, but it is usually problematic for two main reasons:

- 1) A delay that is too short can increase the number of misdials. This occurs when customers are not given enough time to enter the extra digits and the phone company switch assumes dialing to the shorter number is complete.
- 2) A delay that is long enough to minimize misdials can cause customers who have dialed the shorter number to abandon calls, concluding that something is wrong because their call is taking unusually long to connect.

Clearly misdials must be avoided, but these two opposing criteria make it difficult or impossible to implement the optimum timing delay when the primary (or only method) for dialing the shorter number depends on timing.

In a UDPFO implementation, the primary method for dialing all numbers in the overlay area is the longer "8 digit" method. This "8 digit" method is also the preferred - or recommended - dialing method for all calls. This is fortunate because it allows the timing delay to be long enough to avoid misdials. The shorter "7 digit" method of dialing is a "default" option, which is triggered only after the likelihood of a misdial has been minimized by an appropriately long timing delay. The appropriate length for this delay should be determined by the industry, but it will likely be somewhere between 3 - 7 seconds. This "7 digit default" option is provided as a "safety net", intended to catch calls that, for whatever reason, are not being dialed with the primary (or preferred) "8 digit" method. This "safety net" will allow automated dialing systems (such as burglar alarms, fire

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

alarms, auto dialers, etc.) to complete calls to pre-relief phone numbers without costly reprogramming. The "safety net" is also helpful for children, the elderly and the handicapped (or anyone for that matter), who might find it difficult to always remember to dial old (established pre-relief) numbers in the new way. It also provides a mechanism for an extremely long permissive dialing period during transition to the UDPFO's 8 digit preferred dialing method.

To recap:

Within the dialing plans of other scenarios using timing, there is usually only one method for correctly dialing a particular long or short number - the long numbers must be entered before the timing delay elapses, while the short numbers must wait until after the delay is complete. Implementing the optimum timing delay to efficiently accommodate these two requirements can be problematic.

In a UDPFO scenario timing issues are mitigated by these factors:

- 1) There are multiple methods for customers to dial every number.
- 2) All numbers can be dialed quickly with 8 digits (the "primary" or "recommended" dialing method), which avoids waiting for the delay.
- 3) All numbers can also be reached with 1+10 or 0+10 - also avoiding the delay.
- 4) The "7 digit default" option (which does require the delay) is intended to serve as a courtesy to people who already have phones and services in the original area code, and eliminates the expense and hardship of having to quickly conform systems and habits to the new dialing plan.
- 5) The timing delay could be extremely long (if necessary to avoid misdials), since the 7 digit default option is not the primary (or preferred) method of dialing.
- 6) Because the delay can be significant, the timing delay could even contain recorded instructions as to how to use it (if found to be necessary).
- 7) If the delay is too long, a customer can always enter a "0" at the end of the 7 digit number and avoid the delay - it will still reach the same number: 7 digits + delay = 7 digits + 0.
- 8) The timing mechanism can be avoided altogether by dialing with the 1+ 10 option, if that is how a customer prefers to dial.

How well would this plan work for long distance calls? Customers would not be used to the new overlaid area code since they wouldn't have to dial it internally, and instead of dialing 1-732-949-1000 to get that number they are likely to dial 1-908-949-1000-1, prompting a wrong number. Won't this be problematic?

The UDPFO offers an evolved dialing system which allows all calls made within the UDPFO geographic area to be dialed by using only 8 digits. This would hold true for both local and long distance calls. If you choose to dial 1+10 digits for local or long distance calls within the grouping you may, but it would not be mandatory.

When dialing to an area code outside of the UDPFO grouping, it would be necessary to dial 1+10 digits. This is no different than how the network currently works. Customers must commit these foreign area codes to memory in any dialing scenario.

Customers dialing into a UDPFO grouping from a foreign area code would also have to remember the various area codes, but this is also no different than when dialing into a standard overlay grouping.

In traditional NPAs with 7 digit internal dialing, people are aware of their own area code even though they don't use it for day to day calls. When they leave their NPA and call home, they typically remember to dial their area code first, followed by their 7 digit number -- if they forget to dial the area code a wrong number will result in these cases as well.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

There is no reason to believe that people in the new level of a UDPFO overlay would be any less aware of their own new area code than people in traditional 7 digit NPAs.

This question should be further analyzed in comparison to the effects of area code splits and standard overlays.

After an area code split or a standard overlay implementation, people are also not used to the new area code, and there are many "wrong numbers" prompted in these cases, for instance:

After an area code split:

Because of force of habit, where people have had the same area code for many years:

- a) Customers with the new area code will often attempt to dial into the old area code by dialing only 7 digits, while customers in the old area code will make the same mistake for the new area code -- this is not a problem in the UDPFO, since area codes are not rearranged, and the 7 digit default method will accommodate force of habit for an extended period of time.
- b) Even when dialing from outside either of the "split" area codes (with 10 digit or 1+10 digit dialing), force of habit will continue to prompt wrong numbers into both area codes. In fact customers from all over the world are likely to make this mistake when calling into an NPA that has been split. These mistakes are far less likely to happen with a UDPFO or standard overlay situation, since the numbers in the original area code remain unchanged.
- c) Occasional callers of a customer who gets a new "split off" area code will continue to dial the customer's old area code for many years, and possibly lose contact with him altogether because of the area code change. Again, this type of mistake is far less likely to happen with a UDPFO or standard overlay situation.

Also, in a standard overlay implementation, will a person always remember to use the correct area code, or by force of habit will they use the original area code when making Long Distance calls even from inside the overlay area?

When a standard overlay is implemented, people from each of the overlay's area codes must always remember to dial it, which may or may not happen reliably -- especially at first. In the UDPFO, any number that has ever been dialed will always be dialable in the same manner it always has been, and by everybody in the entire overlay area.

Does this plan offer a permissive dialing period?

Yes, there is a permissive dialing period, and it is supported indefinitely by the 7 digit default feature of the UDPFO. The permissive period for calls originating from outside of the UDPFO grouping would be similar to that of a standard overlay.

Wouldn't a massive re-education campaign be required and need to be on-going since out-of-towners would not know about 8 digit dialing?

The non-disruptive nature of this plan actually simplifies the public education process. The "7 digit default" dialing option ensures that all pre-relief phone numbers can still be dialed the same way that they always have been from anywhere in the overlay area. All numbers can also be dialed with '1+10 digit' dialing, which is also nothing new to learn. The only new option is the '7 digit + X' suffix option, which is different, but not difficult to understand or learn. Public education is probably less of a challenge than in an area code split (where you can no longer reach certain numbers the way you have in the past) or in a standard overlay (where every number changes to 1+10, which is also different from what customers are accustomed to).

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

It is also important to examine the issue of out-of-towners in relation to area code splits and standard overlays.

In standard overlay areas out-of-towners also might not know about mandatory 10 digit or 1+10 digit dialing, being accustomed to dialing 7 digits within their own area code.

In a split situation, out-of-towners calling into the area from out of town might not be able to find the people they had always been able to reach before with the old area code.

Also, out-of-towners who came to town after a split and wanted to call someone who was in the new area code probably would not realize there was now a new area code, and would just dial 7 like they always had done, getting either a wrong number or a not in service message.

In the UDPFO, the out-of-towner has the best chance of dialing correctly. Any 7 digit number they had dialed in the past would still be valid (from any phone, regardless of the area code, in the UDPFO grouping). If they wanted to call any new number, they could simply dial with 1+10 digit dialing -- industry standard stuff. If they were aware of the 8 digit option they could also use that method. In the timing delay suggestions I outlined earlier, a recorded message could possibly act as a continuing reminder of how the 8 digit plan works.

How would the translation be implemented by phone company equipment? Are you asking carriers to read the 8th digit and prefix, in the switch, to derive the correct area code?

Exactly how the translation is best accomplished is really a matter for the industry to resolve, and the cost of implementation will depend on the choices the industry makes for this deployment. An important question is this: How will these costs compare to the overall cost of a split or an overlay in terms of total expense and disruption to both the phone companies and the public? A single area code split costs local businesses between 20 and 40 million dollars, and the phone companies spend between 6 and 10 million per split. Would the cost of developing the software and installing switch upgrades for a UDPFO implementation be greater than the overall cost of an area code split? It is very possible that developing this technology could quickly pay off as an overall savings. So, while it is obvious that there is a cost associated with any change to the network, it is also obvious that it is not the only cost. The full answer to what those costs will be will have to wait until a fair assessment is done by the industry.

How are things like the Dallas retroactive overlay handled? How about if the retroactive overlay was not done, but an overlay over two existing NPAs was done?

The UDPFO was designed to deliver the most benefit in situations where the overlay grouping consists of one original area code and one or more new overlaid area codes, all of which occupy the identical geographic area. However, the 8 digit "unified dialing" feature of the plan (for dialing within and between groups of related area codes) could benefit consumers in these other overlay scenarios as well. In these cases the 7 digit default feature would also be employed, but only as a short term "transitional" permissive dialing vehicle.

Where two existing NPAs are overlaid, the transition would take place in two phases.

Area Code A = either of the existing area codes

Area Code B = the other existing area code

Area Code C = the new overlay area code

Note: to avoid confusion with UDPFO scenarios where there is only one original area code, the '0' suffix should not be used in cases where there are two or more original area codes.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

First:

- a) Before implementing the overlay, each of the two existing NPAs would separately migrate from 7 digit to 8 digit dialing using the 7 digit default as the transition vehicle (1+10 digit dialing within each area code would also be enabled at this time).
- b) Area Code A would migrate to 7 digit+'1' suffix.
- c) Area Code B would migrate to 7 digit+'2' suffix.
- d) In either case, 7 digit calls (with a delay) would default to the area code of origin during the permissive period. Remember, in this scenario the two area codes are in separate geographic areas, so 7 digits can default to the area code of origin without confusion.
- e) During this period it might be possible to dial between the two area codes using either the 8 digit option or standard 1+10 digit dialing.

Second:

- a) At the end of the permissive dialing period, each of the existing area codes would have separately migrated to 8 digit or 1+10 digit dialing for all calls, and the 7 digit default method will no longer be available for either area code.
- b) At this point the 8 digit option would definitely be available for dialing between "Area Code A" and "Area Code B".
- c) The third area code would now be overlaid and could immediately use 8 digit or 1+10 digit dialing for all calls. The 8 digit numbers in this overlaid area code would be 7 digit+'3' suffix.
- d) Finally, all three area codes are *unified* with the 8 digit dialing option. Naturally 1+10 digit dialing would also be an available dialing method, if anyone cared to use it.

Won't problems arise from the fact that the number the customer knows is not the number that the customer is identified with in the PSAP (911) database?

Drawing from my own experience, I have always dialed 7 digits in my local area, but I am still aware that my area code is 818. In a UDPFO scenario, the customer will think of his number as a 3 digit area code + 8 digit number. There is no reason why a person would not be aware of his/her full 11 digit number any more than people who are used to dialing 7 digits now would be unaware that their full numbers have 10 digits.

Switches are set to look at an initial digit string. Wouldn't it be expensive to build the features necessary to do what the UDPFO suggests in looking at the first 3, plus the last 1 to determine the area code?

The plan may or may not be expensive to implement, but any discussion of costs must take into consideration the overall cost of not implementing this plan. As stated earlier, a single area code split costs business, the public and the telephone companies up to an estimated 50 million dollars each time -- is this current expenditure for area code splits acceptable now? Would the costs to modify one NPA for a UDPFO scenario be greater than that?

Things would get very interesting where digits had to be outpulsed to a PBX; this is done with a delete and prefix. Wouldn't this create a problem in a UDPFO scenario?

The PBX would receive the outpulsed numbers after they were translated to standard 3+7 digit numbers by the network. Therefore, no changes at all from current procedures would be necessary for outpulsing numbers to a PBX.

Won't some interesting (and expensive) recording and billing system changes be required by this plan?

No changes to billing systems will be required since all numbers are translated to the same industry standard 3+7 digit numbers which the billing systems are already designed to understand.

FREQUENTLY ASKED QUESTIONS ABOUT "THE UNIFIED DIALING PLAN FOR OVERLAYS"

Wouldn't there be lots of problems with getting people to do the timing reliably? It seems as though the failure cases would keep the PUC up at night with complaints.

Possibly, but refer to the earlier question on this issue. As mentioned previously, this feature could be modified, phased out over time, or even left alone if it works fine as is. Also, make sure to evaluate the UDPFO in relation to the other forms of area code relief that are already in use. Splits and standard overlays provide new numbers to exhausted areas, but in the process they create many problems for customers. The UDPFO also provides new numbers, but minimizes hardship to the customer by solving many area code relief related problems. If there are some minor problems introduced by the UDPFO, they are far outweighed by the benefits it offers over the current area code relief methods.

How does this plan fix the competitive issue? For instance: If I the CLEC get a code in the child NPA, folks need to do something special to get to my customers, i.e. dial that funky suffix or dial 1+10 digits. Won't this be a competitive disadvantage for my company?

As pointed out earlier in great detail, people will not intentionally dial with the 7 digit default method (which always requires a timing delay), it is less efficient than dialing 8 digits, and it is probably also less efficient than dialing 1+10 digits. It is provided to act as a safety net -- to protect people who might accidentally forget to dial 8 digits for the numbers they have known for many years as 7 digit numbers. It is also for use by auto dialers and burglar and fire alarms which have already been programmed, where updating those programs would be difficult or expensive for the customer. There is no competitive advantage or disadvantage to the 7 digit default -- people will prefer to dial phone numbers as 8 digits (7+suffix) regardless of area code -- it's just simply more efficient that way.

Why should the industry take the time to give serious consideration to this plan?

The ideas offered in the UDPFO are intended to solve the area code crisis with a minimum of disruption and hardship for the public. It has been offered in good faith as a serious solution by a citizen/business owner who has been impacted several times already with the disruption and expense of area code relief. It deserves to be evaluated with the same consideration with which it is presented.

UDPFO Conclusion:

The true purpose of this plan is to eliminate the expenses and hardships that customers have endured whenever area code relief has been necessary. By allowing backward compatibility for existing dialing patterns to pre-relief phone numbers, the UDPFO simplifies the public's transition to overlays and minimizes direct costs, hardships and confusion for the customer. The plan's 8 digit dialing option demonstrates how dialing parity can be maintained in an overlay without requiring the full 1 + 10 digit phone number to be dialed. This is a further convenience to the customer, and it provides a sense of 'unity' (instead of the sense of disunity) in an area where multiple area codes co-exist.

This plan addresses and resolves all of the public policy issues that are presented by splits and standard overlays. Given its benefits, if this plan is given a fair evaluation by the industry in terms of "how can we make this work" instead of proclaiming "why this plan won't work", the industry will be providing its customers and our communities a great service.

**FREQUENTLY ASKED QUESTIONS ABOUT
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

How to contact the UDPFO:

If you have questions or comments regarding this information, please contact me at:

818-999-1070-0 (voice/voice mail)

818-956-2200-0 (alt. voice)

818-956-3298-0 (fax)

UNIFIEDdpo@AOL.com (email)

Gilbert Yablon

The Unified Dialing Plan for Overlays

21914 Dumetz Rd.

Woodland Hills, CA 91364

July 11, 1999

Re: Technical feasibility of the 8-Digit Dialing Plan proposed by Gilbert J. Yablon

To Whom It May Concern:

In July of 1998 I retired as the Executive Director - Operations and Engineering for the United States Telephone Association (USTA) after 36 plus years of experience encompassing diverse disciplines in the telecommunications industry.

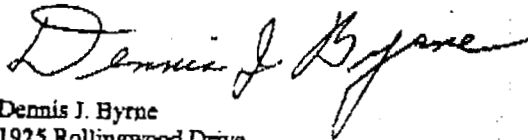
As the Executive Director of the Technical Disciplines Department, I managed a large portion of the technical committee activities at USTA associated with numbering issues. As part of my responsibilities, I was required to regularly attend and participate in most of the industry meetings concerning numbering matters. I served as Chair or Co-Chair on a number of these various committees and working groups including the Industry Numbering Committee (INC).

I have thoroughly reviewed Gilbert J. Yablon's 8-Digit Dialing Plan and have found it to be a technically feasible plan that should be considered when addressing area code relief. The plan does conform to the NANP in that each customer retains a seven digit address (ten digit including area code) and the eighth digit is used for dialing purposes only to identify the specific NPA.

As with any plan to provide relief, there will be costs associated with the plan. The cost and the extent of equipment modifications that will be incurred by the industry for each of the alternatives considered can only be addressed by the industry. The same is true for the cost to be incurred by the consumer. A cross-section of consumer groups needs to compile this data. And no matter what plan is implemented there will be customer confusion and education.

Providing area code relief is expensive and disruptive to both the industry and the consumer, therefore, all methods available that would ease this burden should be considered in enough detail to minimize the impacts.

Sincerely,



Dennis J. Byrne
1925 Rollingwood Drive
Fairfield, CA 94533
707-435-8285

A SMART Overlay Solution

The overlay has been a source of hardship and frustration for telephone users within the 310 region, but the overlay didn't have to be painful. In fact, a consumer-friendly variation called **SMART** (Simplified Multi Area Code Region Telephony) could transform overlays (including the 310 overlay) into a painless option for area code relief.

SMART provides customers with two tools that make living with overlays easier. First, it provides a shortcut "8-digit method" for dialing 1+10-digit calls within the region; and second, it prevents calls dialed with only 7-digits from being rejected.

To make eight-digit dialing possible, telephone companies would assign a one-digit identifier to each area code in the overlay region. Customers could then dial local 7-digit telephone numbers and use an 8th digit to identify the area code. For example, the 310 area code would be identified by "0" and the "424" area code would be identified by "1". Dialing 1234567-0 would direct the call to the 310 area code, and dialing 1234567-1 would direct the call to the 424 area code.

But what happens when a customer or auto-dialer enters only 7-digits? In a "standard overlay", customers hear an announcement directing them to hang-up and redial using 1+10-digits -- a huge inconvenience. But with the "SMART overlay", customers who forget about (or don't know about) the 8th digit would hear an announcement after a few seconds to help them complete their call:

"To reach the 310 area code, dial '0' now. To reach 424, dial '1' now."

Customers would have a few more seconds to enter the 8th digit, and after doing so the call would be routed to the selected area code.

If for some reason the "8th digit" is still not entered, the call would default to the original area code of the region (in this case the 310 area code). This enhancement reduces the need for customers to reprogram or replace automated dialing devices (such as security entry systems and other unattended auto-dialers), and minimizes the kind of disruption that occurs when "standard overlays" are implemented.

Calls "to" and "from" area codes that are outside of the **SMART** region will continue to require 1+10-digits to be dialed (the same as was required before the overlay). If the new "area code identifier" is inadvertently entered at the end of a 1+10-digit call, the identifier is ignored and the call completes to the 1+10-digit number that was dialed.

Customers would always have the option of dialing 1+10-digits if they want to (even for local calls within the overlay region), but the 8-digit shortcut should make local calls easier for most customers.

Several telecommunications industry experts consider the "SMART overlay" to be a technically workable solution for area code relief, however the industry as a whole has chosen not to pursue this option on its own.

To benefit from this consumer-friendly solution the public must tell their legislators, the Public Utilities Commission and the telecommunications industry that they are interested in this alternative, and that they want it to be considered as an available option for area code relief.

For more information contact:

Gilbert Yablon
SMART Dialing Systems
gilbert@SMARToverlay.com (e-mail)
818-999-1070-0 (voice / voice mail)

Gilbert Yablon is the developer of the "SMART Dialing System for Overlays". He has been active in telecommunications industry dialing issues for the past three years, and has made numerous contributions to industry forums on numbering.

TIM/hkr 6/29/99

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

Rulemaking 98-12-014
(Filed December 17, 1998)

**ADMINISTRATIVE LAW JUDGE'S RULING GRANTING IN PART AND
DENYING IN PART THE PETITIONS TO INTERVENE FILED BY
(1) BILL NEILL, and (2) GILBERT J. YABLON**

This ruling grants the petitions to intervene filed by Bill Neill and Gilbert J. Yablon to the extent their participation in this proceeding is necessary to determine if their proposals for novel dialing arrangements should be formally considered by the Commission in a future proceeding. In all other respects, their petitions to intervene are denied. This ruling also instructs Neill and Yablon to file and serve written comments containing detailed information on their dialing proposals so that the Commission can determine if their proposals merit further consideration in a future proceeding. Parties may also file and serve comments on the dialing proposals.

Ruling on Neill's Petition to Intervene

On May 26, 1999, Bill Neill filed a petition to intervene in this proceeding¹ for the purpose of presenting a "solution" to the "extensive proliferation of area codes in this state." There was no response to Neill's petition.

¹ *Petition to Intervene of Prof Bill Neill, In Pro Per.*

R.98-12-014 TIM/hkr

Neill's petition failed to identify any "solution" to proliferation of area codes. However, in a phone call to the assigned Administrative Law Judge (ALJ), Neill stated that his "solution" to the proliferation of area codes is "hexa-decimal dialing." According to Neill, hexa-decimal dialing reduces the need for new area codes by expanding the universe of phone numbers within existing area codes by using six additional "symbols" that are already part of the public telecommunications network. For example, the "star" and "pound" symbols that can be dialed by touch-tone telephones could be used to create the following 7-digit phone number within any of the existing area codes: 703-77*#.

For the following reasons, Neill's petition to intervene is denied to the extent the petition asks the Commission to consider in this proceeding whether to require the use of hexa-decimal dialing. First, the petition provided no information on hexa-decimal dialing. Because of this, it is impossible to make a preliminary determination of whether hexa-decimal dialing is feasible. On the other hand, what little information on hexa-decimal dialing that was provided to the assigned ALJ in a phone call indicates that hexa-decimal dialing may not be feasible. For example, people with rotary phones might not be able to dial hexa-decimal phone numbers that contain "star" or "pound" symbols. Until there is some initial showing that hexa-decimal dialing is feasible - a showing that was completely absent from the petition - it is not prudent for the Commission to use its scarce resources to consider the merits of hexa-decimal dialing.

Second, no party had notice of Neill's true purpose for intervening in this proceeding since Neill's petition failed to mention hexa-decimal dialing. As a result, expanding the scope of this proceeding to consider the adoption of hexa-decimal dialing could be prejudicial to those parties who may have opposed Neill's petition had they known of Neill's true purpose for intervening in this proceeding.

R.98-12-014 TIM/hkr

Finally, in Order Instituting Rulemaking 98-12-014, the Commission stated that it would not consider in this proceeding any proposals that require changes to the North American Numbering Plan (NANP)² since implementation of such proposals is beyond the Commission's jurisdiction.³ Since Neill's petition is devoid of information on hexa-decimal dialing, it is impossible to determine if hexa-decimal dialing conforms with the NANP, and, therefore, is a matter within the scope of this proceeding.⁴ Consequently, Neill has failed to meet his burden under the Commission's Rules of Practice and Procedure (Rules) to demonstrate that he seeks to intervene in this proceeding on matters that are reasonably pertinent to scope of this proceeding.⁵

Although Neill's petition to intervene is denied to the extent it asks the Commission to consider in this proceeding whether to implement hexa-decimal dialing, Neill shall have an opportunity to demonstrate that the Commission should consider in a future proceeding whether to implement hexa-decimal

² The NANP is the numbering plan for the public switched network. Telephone numbers used by the NANP consist of NXX-NXX-XXX, where "N" is any digit 2-9, and "X" is any digit 0-9. (http://www.nanpa.com/nanpa_info/index.html)

³ OIR 98-12-014, mimeo., pp. 1, 21, Ordering Paragraph 1, and Appendix B.

⁴ Although Neill seems to suggest in his petition that hexa-decimal dialing would not require changes to the NANP, the validity of this suggestion is questionable given that telephone numbers in common use under the NANP do not include "symbols."

⁵ Neill's filed his petition pursuant to Rule 53 which states: "petitions to intervene...shall set forth the grounds of the proposed intervention, [and] the position and interest of the petitioner in the proceeding ...Leave will not be granted except on averments which are reasonably pertinent to the issues already presented, but do not unduly broaden them." Although Rule 53 applies only to complaint proceedings, the Commission has often used Rule 53 for guidance in determining whether parties should be permitted to intervene in other types of proceedings.

R.98-12-014 TIM/hkr

dialing. To this end, Neill shall file and serve written comments that contain the all of the following information:

- A thorough description of hexa-decimal dialing.
- A thorough explanation of how and why hexa-decimal dialing would alleviate the proliferation of area codes.
- A statement of whether hexa-decimal dialing conforms with the NANP. If Neill asserts that hexa-decimal dialing conforms with the NANP, he must present evidence and arguments in his comments that support this assertion.
- A statement of whether the Commission has authority to implement hexa-decimal dialing. If Neill asserts that the Commission has such authority, he must present evidence and arguments in his comments that support this assertion, including why the Commission's authority is not preempted by the Federal Communications Commission (FCC) pursuant to § 251(e) of the Telecommunications Act of 1996 (the Act).⁶
- A detailed showing that hexa-decimal dialing is a feasible solution to the proliferation of area codes. This showing should address the following factors: (1) the scope of changes to the telecommunications network (e.g., switch modifications) that are required to implement hexa-decimal dialing; (2) the cost to telephone companies to implement hexa-decimal dialing; (3) the cost to the public to implement hexa-decimal dialing; (4) customer confusion, customer education, and the cost of customer education; (4) compatibility with existing and planned "split" and "overlay" area codes; and (5) compatibility with existing telephones (e.g., whether rotary phones can dial "hexa-symbols," and whether touch-tone phones can dial more than two of the hexa-symbols).

⁶ § 251(e) of the Act states that the FCC "shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the [FCC] from delegating to State commissions or other entities all or any portion of such jurisdiction."

R.98-12-014 TIM/hkr

- A thorough explanation as to whether hexa-decimal dialing is compatible with local number portability.
- A thorough explanation as to whether hexa-decimal dialing is compatible with number conservation measures, such as number pooling and rate center consolidation.
- Whether hexa-decimal dialing can be used in conjunction with 8-digit dialing described later in this ruling.

Neill shall file and serve his written comments on July 23, 1999. Parties may file and serve reply comments on August 6, 1999. Neill and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use the comments to decide whether, and to what extent, hexa-decimal dialing merits consideration in a future proceeding.

Consistent with the previous discussion, Neill's petition to intervene is granted to the limited extent of allowing him to participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider hexa-decimal dialing in a future proceeding.

Ruling on Yablon's Petition to Intervene and Motion to Have the Commission Consider 8-Digit Dialing

On May 4, 1999, Gilbert J. Yablon filed (1) a petition to intervene in this proceeding,⁷ and (2) a motion to have the Commission consider in this proceeding whether 8-digit dialing should be used in Numbering Plan Areas (NPAs) subject to overlays.⁸ There were no responses to Yablon's petition or motion (referred to individually and collectively hereafter as the "petition").

⁷ *Motion to Intervene of Gilbert J. Yablon.*

⁸ *Motion to Have the Commission Consider "A Simplified Dialing System for Overlaid Area Codes" AKA "The Unified Dialing Plan for Overlays" filed by Gilbert J. Yablon of SMART Dialing Systems.*

R.98-12-014 TIM/hkr

Yablon states in his petition that 8-digit dialing would be used in lieu of 1+10-digit dialing to make calls within an NPA subject to "overlays" (i.e., NPAs served by two or more area codes). For example, to place calls within an NPA served by two area codes, a caller using 8-digit dialing would dial the 7-digit phone number plus the suffix digits of "zero" or "one" (e.g., 703-4567-0 or 703-4567-1) to reach a number in the first or second area code, respectively.

For the following reasons, Yablon's petition is denied to the extent the petition asks the Commission to consider in this proceeding whether to require the use of 8-digit dialing. First, Yablon does not address in his petition whether 8-digit dialing complies with the NANP and, therefore, is a matter within the scope of this proceeding.⁹ Consequently, Yablon has failed to meet his burden under the Commission's Rules to demonstrate that he seeks to intervene in this proceeding on matters that are reasonably pertinent to scope of this proceeding.¹⁰

Second, Yablon states that 8-digit dialing has been through two "telecommunications industry reviews" in which "[i]ndustry experts refuted the 'need for' and 'value of'" 8-digit dialing due to concerns about costs, switch modifications, and customer education. Yablon dismisses these concerns, but he provided no information that convincingly demonstrates the concerns are unwarranted. Therefore, before the Commission commits its limited resources to

⁹ Yablon states in his petition that 8-digit dialing does "not alter the 10-digit structure of the North American Numbering Plan," but this statement does not address the issue of whether 8-digit dialing complies with the NANP.

¹⁰ Rule 53 states: "Leave [to intervene] will not be granted except on averments which are reasonably pertinent to the issues already presented, but do not unduly broaden them." Although Rule 53 applies only to complaint proceedings, the Commission has often used Rule 53 for guidance in determining whether parties should be allowed to intervene in other types of proceedings.

R.98-12-014 TIM/hkr

seriously considering the adoption of 8-digit dialing, Yablon needs to make a more convincing showing that the concerns about the feasibility of 8-digit dialing are unwarranted.

Although Yablon's petition to intervene is denied to the extent the petition asks the Commission to consider the adoption of 8-digit dialing, Yablon shall have an opportunity to demonstrate in this proceeding that 8-digit dialing is feasible and worthy of serious consideration by the Commission in a future proceeding. To this end, Yablon shall file and serve written comments that contain the all of the following information:

- A thorough description of 8-digit dialing.
- A statement of whether 8-digit dialing conforms with the NANP. If Yablon asserts that 8-digit dialing conforms with the NANP, he must present evidence and arguments in his comments that support this assertion.
- A statement of whether the Commission has authority to implement 8-digit dialing. If Yablon asserts that the Commission has such authority, he must present evidence and arguments in his comments that support this assertion, including why the Commission's authority is not preempted by the FCC pursuant to § 251(e) of the Act.¹¹

¹¹ § 251(e) of the Act states that the FCC "shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the [FCC] from delegating to State commissions or other entities all or any portion of such jurisdiction."

R.98-12-014 TIM/hkr

- A detailed showing that 8-digit dialing is feasible. This showing should address the following factors: (1) the scope of changes to the telecommunications network (e.g., switch modifications) that are required to implement 8-digit dialing; (2) the cost to telephone companies to implement 8-digit dialing; (3) the cost to the public to implement 8-digit dialing; (4) customer confusion, customer education, and the cost of customer education; and (4) compatibility with existing and planned overlays.
- A thorough explanation as to whether 8-digit dialing is compatible with local number portability.
- A thorough explanation as to whether 8-digit dialing is compatible with number conservation measures, such as number pooling and rate center consolidation.
- A description of the two telecommunications industry reviews of 8-digit dialing. Yablon shall append to his comments a copy of any formal reports and/or findings that resulted from these reviews. Yablon may also provide information that demonstrates why the concerns raised in the industry reviews are unwarranted.
- Whether 8-digit dialing can be used in conjunction with haxa-decimal dialing described earlier in this ruling.

Yablon shall file and serve his written comments on July 23, 1999. The parties may file and serve reply comments on August 6, 1999. Yablon and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use the comments to decide whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.

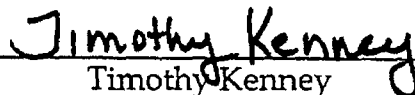
Consistent with the previous discussion, Yablon's petition is granted to the limited extent of allowing him to participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.

R.98-12-014 TIM/hkr

IT IS RULED that;

1. Neill may participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider hexa-decimal dialing in a future proceeding.
2. Neill's petition to intervene in this proceeding is granted to the extent set forth in Ruling Paragraph 1. In all other respects, Neill's petition is denied.
3. Yablon may participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.
4. Yablon's petition to intervene in this proceeding and motion to have the Commission consider 8-digit dialing in this proceeding are granted to the extent set forth in Ruling Paragraph 3. In all other respects, Yablon's petition and motion are denied.
5. Neill and Yablon shall each file and serve written comments on July 23, 1999, containing the information specified in the body of this ruling. The parties may file and serve reply comments on August 6, 1999. Neill, Yablon, and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use these comments to decide whether, and to what extent, hexa-decimal dialing and/or 8-digit dialing will be considered in a future proceeding.

Dated June 29, 1999, at San Francisco, California.


Timothy Kenney

Administrative Law Judge

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: August 2, 1999

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF COMMUNICATIONS (ILERI)

RE: DOCKET NO. 981444-TP - In re: Number Utilization Study:
Investigation into Number Conservation Measures.

RECEIVED-FPSC
AUG -3 PM 12:14
RECORDS AND
REPORTING

Attached is a **LETTER** from Mr. Gilbert Yablon to be filed
on the correspondence side in the above-referenced docket.

LI
Attachments
cc: Division of Legal Services (Cox)

Gilbert Yablon
SMART Dialing Systems
21914 Dumetz Rd.
Woodland Hills, CA 91364
818-999-1070

7/27/99

Levent Ileri
Engineer, Division of Communications
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Levent,

Thanks again for your letter. I was not able to include it with my comments on the 23rd, however I am including it in direct correspondence with legislators and regulators to demonstrate that there already is interest in the proposal. Hopefully this will help them feel comfortable showing interest themselves.

Since you have included the proposal in your docket, the material in this package might be useful. The package includes all of the current information regarding my motion to have the CPUC consider the 8-digit overlay.

- A brief description of the plan.
- My motion to have the CPUC consider the proposal in R98-12-014.
- Scoping memo and ruling of the assigned commissioner.
- Administrative Law Judge's ruling on the proposal.
- Comments on the ALJ's ruling.

I hope this will be helpful in the FPSC's proceedings as well.

Let me know what I can do to help in the Florida Commission's investigation of the proposal.

Sincerely,



Gilbert Yablon

MAIL ROOM
17 AUG 1 - 90V 66
RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION

RECEIVED

AUG 02 1999

CMU

IT'S TIME TO GET
SMART

ABOUT AREA CODE OVERLAYS

Wish you could
dial just 8-digits for all of your overlay calls?

1234567-0=1-310-1234567

1234567-1=1-424-1234567

Wish your auto-dialer would still function
without hours of reprogramming?

Wish that overlays didn't have to be such a pain?

Well, overlays don't have to be painful! Log on to www.SMARToverlay.com and read about the plan that makes living with overlays easy. Once you realize how simple it is, ask your legislators and the CPUC why the telephone companies aren't already doing it the SMART way.

gilbert@SMARToverlay.com
818.999.1070



www.SMARToverlay.com

A SMART Overlay Solution

The overlay has been a source of hardship and frustration for telephone users within the 310 region, but the overlay didn't have to be painful. In fact, a consumer-friendly variation called **SMART** (Simplified Multi Area Code Region Telephony) could transform overlays (including the 310 overlay) into a painless option for area code relief.

SMART provides customers with two tools that make living with overlays easier. First, it provides a shortcut "8-digit method" for dialing 1+10-digit calls within the region; and second, it prevents calls dialed with only 7-digits from being rejected.

To make eight-digit dialing possible, telephone companies would assign a one-digit identifier to each area code in the overlay region. Customers could then dial local 7-digit telephone numbers and use an 8th digit to identify the area code. For example, the 310 area code would be identified by "0" and the "424" area code would be identified by "1". Dialing 1234567-0 would direct the call to the 310 area code, and dialing 1234567-1 would direct the call to the 424 area code.

But what happens when a customer or auto-dialer enters only 7-digits? In a "standard overlay", customers hear an announcement directing them to hang-up and redial using 1+10-digits -- a huge inconvenience. But with the "SMART overlay", customers who forget about (or don't know about) the 8th digit would hear an announcement after a few seconds to help them complete their call:

"To reach the 310 area code, dial "0" now. To reach 424, dial "1" now."

Customers would have a few more seconds to enter the 8th digit, and after doing so the call would be routed to the selected area code.

If for some reason the "8th digit" is still not entered, the call would default to the original area code of the region (in this case the 310 area code). This enhancement reduces the need for customers to reprogram or replace automated dialing devices (such as security entry systems and other unattended auto-dialers), and minimizes the kind of disruption that occurs when "standard overlays" are implemented.

Calls "to" and "from" area codes that are outside of the SMART region will continue to require 1+10-digits to be dialed (the same as was required before the overlay). If the new "area code identifier" is inadvertently entered at the end of a 1+10-digit call, the identifier is ignored and the call completes to the 1+10-digit number that was dialed.

Customers would always have the option of dialing 1+10-digits if they want to (even for local calls within the overlay region), but the 8-digit shortcut should make local calls easier for most customers.

Several telecommunications industry experts consider the "SMART overlay" to be a technically workable solution for area code relief, however the industry as a whole has chosen not to pursue this option on its own.

To benefit from this consumer-friendly solution the public must tell their legislators, the Public Utilities Commission and the telecommunications industry that they are interested in this alternative, and that they want it to be considered as an available option for area code relief.

For more information contact:

Gilbert Yablon
SMART Dialing Systems
gilbert@SMARToverlay.com (e-mail)
818-999-1070-0 (voice / voice mail)

Gilbert Yablon is the developer of the "SMART Dialing System for Overlays". He has been active in telecommunications industry dialing issues for the past three years, and has made numerous contributions to industry forums on numbering.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

R 98-12-014
(Filed December 17, 1998)

**MOTION TO HAVE THE COMMISSION CONSIDER
"A SIMPLIFIED DIALING SYSTEM FOR OVERLAID AREA CODES"
AKA "THE UNIFIED DIALING PLAN FOR OVERLAYS"**

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Rd.
Woodland Hills, CA 91364
Telephone: (818) 999-1070
Facsimile: (818) 956-3298
E-mail: unified1@pacbell.net

May 3, 1999

Filed as an interested party.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

R 98-12-014
(Filed December 17, 1998)

**MOTION TO HAVE THE COMMISSION CONSIDER
"A SIMPLIFIED DIALING SYSTEM FOR OVERLAID AREA CODES"
AKA "THE UNIFIED DIALING PLAN FOR OVERLAYS"**

In accordance with Rule 45 of the Commission's Rules of Practice and Procedure, I respectfully request that the Commission look at "A Simplified Dialing System for Overlaid Area Codes" aka "The Unified Dialing Plan for Overlays", for the purpose of having this consumer-friendly area-code relief solution considered by the Commission as part of its Policy on Area Code Relief.

Documentation about this proposed system (including a working, hands-on computer simulation) demonstrates how overlays can be modified so that relief can be provided in a manner that is less disruptive for the public. This plan does not alter the 10-digit structure of the North American Numbering Plan, and can be implemented locally without affecting dialing or switching anywhere else. This system merely provides customers with an abbreviated method for dialing standard NANP numbers from within overlay regions. For summary review, a brief description of this proposal has been submitted as an attachment to this motion. More detailed materials will be provided at the Commission's request.

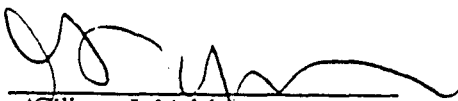
Review and consideration of this modified-overlay proposal would seem to be appropriate for this proceeding. The Commission currently is faced with choosing between two (or some combination of two) unpopular area-code relief options, which will determine California's future policy on area code relief. The choice will not be an easy one, nor will the impact of the Commission's decision be trivial -- for although the Telecommunications Industry is satisfied that area-code splits and standard overlays provide new numbers in the simplest, least

expensive manner for the Industry, customers are left with the burden and expense of adapting to the hardship that these options create.¹

It is my position that this "Simplified Dialing System for Overlaid Area Codes" is a cost-effective solution which meets the needs of all parties (regulators, the Telecommunications Industry AND the public) and that it can be quickly implemented, using current equipment and technologies, if an unbiased, outside-of-the-box analysis of this option is conducted by the Commission.

Accordingly, I respectfully request that the Commission allow this consumer-friendly area-code relief alternative to be looked at during this proceeding so that it can be considered as an available option for the Commission's Policy on Area Code Relief.

Respectfully submitted,

By 
Gilbert J. Yablon

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Rd.
Woodland Hills, CA 91364
Telephone: (818) 999-1070
Facsimile: (818) 956-2200
E-mail: unified1@pacbell.net

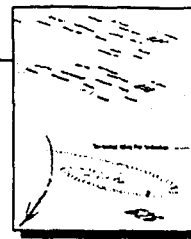
May 3, 1999

An interested party.

ATTACHMENT

¹ Two Telecommunications Industry reviews of "The Unified Dialing Plan for Overlays" have previously been conducted, in which Industry experts have refuted the "need for" and "value of" the consumer-oriented features of this proposal. Rather than consider the plan on its merits, the industry has cited factors (including costs, switch modifications, customer education and even some reasons that do not at all apply) as reasons why this system should not be seriously considered as an option for area-code relief. Their arguments have ignored the fact that all solutions, including area-code splits and standard overlays, require that money be spent, that switches be modified and that customers be informed. However, unlike splits and standard overlays, which are very disruptive for the public, this plan minimizes disruption and provides customers with a simplified system for dialing in overlay regions. In addition, several independent experts have evaluated this proposal to be technically workable and have indicated that the cost of implementation would be similar to the overall cost of an area code split or a standard overlay. Industry bias aside, it would appear that the main difference between the currently approved options and this "Simplified Dialing System for Overlays" is that customers will face less hardship, inconvenience and expense when area-code relief is implemented in this alternative manner.

The Unified Dialing Plan for Overlays



A Simplified Dialing System, For Overlaid Area Codes

Information Sheet

Plan Developer: Gilbert Yablon

Contact: (818) 999-1070-0 voice / voice mail
(818) 956-2200-0 alt. voice
(818) 956-3298-0 fax
unified1@pacbell.net e-mail

Plan Brief: Unlike standard overlay scenarios which require 10-digit numbers to be dialed for all calls, this consumer friendly variation allows customers to dial their usual 7-digit numbers + one extra digit to indicate the desired area code.

For Instance:

- *The original area code of the region would be represented by a "0".*
- *The first overlaid area code of the region would be represented by a "1".*
- *The second overlaid area code of the region would be represented by a "2".*
- *Etc.*

Example: If this system were applied to the 310/424 area code region, telephone numbers within that region could be dialed as follows:

- To reach a number that has the 310 area code:
dial the "seven digit number" + "0" (i.e. 956-1234-0)
- To reach a number that has the 424 area code:
dial the "seven digit number" + "1" (i.e. 956-1234-1)
- For future overlaid area codes in the region:
dial the "seven digit number" + "2" (or "3" or "4" or "5" etc.)

It's that simple!

Backward Compatibility: Transition to this 8 digit plan is facilitated by a "safety net" which catches old style 7-digit calls after a timing interval elapses. This "safety net" will also ensure that emergency calls inadvertently dialed with only 7 digits will not be lost.

Major Benefits:

- Easy to explain to the general public.
- Customers get to keep their existing area codes and phone numbers.
- Backward compatible with existing dialing patterns.
- Minimizes impact on children, handicapped persons, and the elderly.
- Minimizes reprogramming of emergency auto-dialers.
- The 'Unified' model minimizes competitive disadvantages normally associated with a new "overlaid" area code.
- Dialing parity is maintained per FCC mandate, using only 8 digits instead of 10 (or 1+10).
- Allows for up to ten times as many numbers in any given geographic region without requiring 10-digit (or 1+10-digit) dialing.
- Long term relief is provided for exhausted area codes with minimal disruption, confusion and inconvenience.

Major Dialing Change: After dialing a 7-digit number, an 8th digit is entered for selecting the desired area code.

Background and Plan Overview:

The Unified Dialing Plan for Overlays evolved from an effort to find a technically workable solution for area code relief which would minimize hardships for local businesses and the public. It describes an abbreviated dialing system for use within geographic overlay regions.

Three types of dialing are supported by the plan:

- 8-digit abbreviated dialing, which unifies the multiple area codes of the region.
- 7-digit default, which acts as a "safety net" to catch calls inadvertently dialed with 7 digits.
- 10-digit (or 1+10-digit) dialing, which is available for all calls if desired, but is not mandatory.

Eight digit dialing is the *new* element and is achieved by dialing a "standard 7 digit phone number" plus a "one digit area code selector". Telephone company equipment would translate the 8 dialed digits into 1+10-digits and then route the call to the dialed "7 digit phone number" within the "selected" area code.

If only 7 digits are dialed, after an industry specified delay the call will be translated and routed to the original area code of the region. This mechanism acts as a "safety net" which prevents old-style 7-digit calls from being lost, ensuring that no one will be put in jeopardy by a change to their local dialing plan. Though this "safety net" feature is by no means intended to be the preferred (or dominant) method of dialing in the region, it does provide a way to minimize the risk that emergency calls (or other important calls), dialed by an auto-dialer, a distressed citizen or a child, might go unanswered.

To summarize:

- After 8 digits are dialed:
telephone company equipment translates the number to "1 + the specified area code + the 7-digit number", and then routes the call.
- After 7 digits are dialed if an 8th digit is not entered within the allotted interval:
telephone company equipment translates the number to "1 + the original area code + the 7-digit number", and then routes the call.
- If 1+10 digits are dialed:
telephone company equipment accepts the number directly as received, and routes the call.

Naturally, all calls to area codes outside of the overlay region would still require 10-digits (or 1+10-digits) to be dialed, and all incoming calls, originating from area codes outside of the region, would also require 10-digits (or 1+10-digits) to be dialed.

A variation of this plan could also be used to introduce this 8-digit system to established overlay regions. In those cases the 7-digit "safety-net" feature might be not be necessary because all 7-digit dialing patterns in the region would have already been abandoned.

The "Unified Dialing Plan for Overlays" provides customers with a simplified method for dialing in overlay regions, and minimizes the disruption that is caused by traditional forms of area code relief. Since this 8-digit system is merely an alternate way of accessing standard 10-digit numbers within the North American Numbering Plan, implementing this proposal would have minimal impact on the telephone network, and any necessary switch modifications and expenses would be limited to the regions where this plan might be adopted.

Please note: A detailed presentation of this plan is available upon request and Gilbert Yablon is available to discuss the specifics of this plan with any interested party.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

Rulemaking 98-12-014
(Filed December 17, 1998)

SCOPING MEMO AND RULING OF THE ASSIGNED COMMISSIONER

This ruling determines the category, need for hearing, scope, and schedule of this proceeding in accordance with Article 2.5 of the Commission's Rules of Practice and Procedure (Rules). This ruling's determination of category may be appealed to the Commission in accordance with Rule 6.4. All other determinations made by this ruling are final. This ruling also allows parties to submit statistically valid surveys of consumer preferences for splits versus overlays by no later than August 31, 1999. If any surveys are submitted, parties may file opening comments regarding the surveys on September 10, 1999, and reply comments on September 22, 1999. Finally, this ruling directs parties to submit to the assigned Administrative Law Judge (ALJ) by September 29, 1999, an electronic copy of their written comments filed in this proceeding.

Background

Order Instituting Rulemaking (OIR) 98-12-014 was issued by the Commission on December 17, 1998. The purpose of this rulemaking is to consider (1) policy options to govern the implementation of new area codes, and (2) Pacific Bell's petition to modify Decision (D.) 96-12-086 to repeal the requirement that geographic splits are to be used to implement all new area

codes (except for the 310 NPA) scheduled to become operative prior to 2001.

As required by Rule 6(c)(2), the Commission preliminarily determined OIR 98-12-014 that: (1) the category for this proceeding is quasi-legislative;¹ (2) a hearing is needed in this proceeding for the receipt of legislative facts but not adjudicative facts;² (3) the scope of this proceeding consists of Pacific Bell's petition to modify D.96-12-086 and the matters identified in Appendix B of OIR 98-12-014; and (4) the schedule for this proceeding consists of the milestones set forth in Appendix A of the OIR. The OIR also notified parties that Commissioner Neepor and ALJ Kenney were assigned to this proceeding.

Parties filed opening comments on February 1, 1999. On February 17, 1999, the League of California Cities filed a motion for leave to submit late-filed opening comments. The motion was granted in a ruling issued by assigned ALJ on February 22, 1999. Parties filed reply comments on March 5, 1999.³ There were no motions for evidentiary hearings.

¹ Rule 5(d) defines a "quasi-legislative" proceeding as one in which the Commission establishes policy or rules affecting a class of regulated entities.

² Rule 8(f)(3) defines "legislative facts" as general facts that help the tribunal decide questions of law, policy, and discretion. Rule 8(f)(1) defines "adjudicative facts" as answers to questions such as who did what, where, when, how, and why.

³ Opening and/or reply comments were filed by the following parties: AT&T Communications of California, Inc., the California Alarm Association, the League of California Cities, MCI WorldCom, Inc., the Office of Ratepayer Advocates, Pacific Bell, Pacific Bell Wireless, Paging Network, Inc., RCN Telecom Services of California, Inc., Roseville Telephone Company, WirelessCo, L.P., and WinStar Wireless, Inc. Joint comments were filed by: (1) the Cities of Burbank and Glendale; (2) Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., The Ponderosa Telephone Co., and Sierra Telephone Company; (3) the California Cable Television Association, ICG Telecom Group, Inc., NEXTLINK California, and FirstWorld Communications, Inc.; (4) California Small Business Association and California Small business Roundtable; (5) Evans Telephone Company, Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Company, The

Footnote continued on next page

Category

The OIR contained a preliminary determination that the category for this proceeding is quasi-legislative.⁴ No party objected to this preliminary determination. Therefore, pursuant to Rule 6(c)(2), I affirm that the category for this proceeding is quasi-legislative.

Need for Evidentiary Hearings

The OIR contained a preliminary determination that an evidentiary hearing would not be necessary in this proceeding.⁵ The OIR also stated that any party who believes an evidentiary hearing is necessary should file a motion requesting such a hearing by March 26, 1999.⁶ No such motions were filed. Therefore, in accordance with Rules 6(c)(2) and 6.3, I affirm that there is no need to hold an evidentiary hearing. However, as discussed further on in this ruling, parties may have additional opportunities to file motions for evidentiary hearings. Accordingly, this ruling's determination on the need for evidentiary hearings may be changed if additional motions for evidentiary hearings are filed and granted.

Scope of Proceeding

The OIR stated that the scope of this rulemaking is to: (1) adopt a policy for implementing new area codes based on the use of geographic splits, the use of overlays, or some combination of these two options; (2) consider when the area

Siskiyou Telephone Company, The Volcano Telephone Company, and Winterhaven Telephone Company; (6) Focal Communications Corporation of California, GST Telecom California, Inc., GST Pacific Lightwave, Inc., and Allegiance Telecom of California, Inc.; and (7) GTE California Incorporated and GTE Communications Corporation Company.

⁴ OIR, mimeo., p. 21.

⁵ OIR, mimeo., pp. 21-22.

⁶ OIR, Ordering Paragraph 13.

code policy adopted in this rulemaking should become effective and to which NPAs the policy should apply; and (3) consider Pacific Bell's petition to modify D.96-12-086 in which Pacific proposed several modifications to our existing area code policy. The OIR also stated that this proceeding will not consider area code policy options that require changes to the North American Numbering Plan since implementation of such changes is beyond the Commission's jurisdiction.⁷

No party objected to the scope of this proceeding as set forth in the OIR. Therefore, pursuant to Rule 6.3, I rule that the scope of this proceeding shall be as described in the OIR. I note, however, that the scope of this proceeding could be altered by the following matters. First, there is a pending motion⁸ which asks the Commission to consider in this proceeding whether 8-digit dialing should be allowed in NPAs subject to overlays.⁹ I shall instruct the assigned ALJ to rule on the motion. Second, the Commission recently filed two petitions at the Federal Communications Commission (FCC) which asked the FCC to delegate to the Commission the authority to implement (1) service-specific area code relief, and (2) NXX code conservation measures. If the petitions are granted, I may ask parties to submit additional comments regarding the implications of the petitions. Finally, legislation has been introduced in Sacramento and Washington D.C. that could affect the Commission's options concerning area

⁷ OIR, mimeo., pp. 1, 21, Ordering Paragraph 1, and Appendix B.

⁸ *Motion to Have the Commission Consider "A Simplified Dialing System for Overlaid Area Codes" AKA "The Unified Dialing Plan for Overlays"* filed by Gilbert J. Yablon of SMART Dialing Systems.

⁹ The proposed 8-digit dialing format would be used by subscribers to make calls within an NPA with two or more area codes. For example, in the NPA served by the 310 and 424 area codes, to reach a number in the 310 area code the caller would dial a seven-digit number plus "zero" (e.g., 123-4567-0); and to reach a number in the 424 area code, the caller would dial a seven-digit number plus "one" (e.g., 123-4567-1)

code relief and NXX code conservation measures.¹⁰ If any of this legislation is enacted, I may ask parties to submit additional comments regarding the implications of the legislation.

Consumer Surveys

The OIR invited parties to comment on whether consumers should be surveyed about whether they prefer splits or overlays.¹¹ Those who submitted comments in favor of the survey stated that the survey should be conducted by the Commission and carried out by neutral professionals. Some of these parties also suggested that in lieu of a new survey, the Commission could rely on the surveys that the Commission found reasonable in D.96-12-086. Conversely, those parties opposed to the survey stated that the survey would not be a reliable basis for setting statewide area code policy because it would provide only a "snapshot" of shifting consumer preferences; and because the relative merits of splits versus overlays are simply too complex to adequately address in a survey.

After having carefully reviewed the parties' comments, I have decided to proceed as follows. First, I shall not rely on the consumer surveys that the Commission found reasonable in D.96-12-086. In my opinion, these surveys have grown stale and may no longer be an accurate gauge of consumer preferences. Second, I will allow parties to submit by August 31, 1999, their own surveys of consumer preferences for splits versus overlays. Any party that intends to submit a survey should file and serve a notice of their intent by June 8, 1999. If

¹⁰ Assemblyman Knox has introduced legislation in Sacramento, and Senator Susan Collins in Washington D.C.

¹¹ OIR 98-12-014, mimeo., p. 17.

such notice is provided, then other parties may file and serve a "reply notice" by June 15, 1999, stating their intent to submit a consumer survey.

Any party that elects to submit a survey should adhere to the following principles. First, in developing the survey, the party should use as a starting point the surveys that the Commission found reasonable in D.96-12-086. Second, the party conducting the survey should invite all other parties to a meeting for the purpose of reaching a consensus on the specific questions to be asked in the survey. Third, the survey should be conducted by neutral professionals. Fourth, the survey should include a statistically valid sample of consumers from the 310 NPA, which is in an advanced stage of implementing California's first overlay; and from the 925 NPA, which has undergone two splits in recent years. In my opinion, consumers in these two NPAs will collectively have a good understanding of the relative merits of splits and overlays. Finally, the survey should encompass large and small business customers, as well as rural, suburban, and urban residential customers.

If any surveys are submitted, parties may file and serve opening comments regarding the surveys on September 10, 1999, and reply comments on September 22, 1999. The comments should focus on the relevance of the survey results in deciding whether the primary means for implementing area codes should be through the use of geographic splits, the use of overlays, or some combination of these two options. Any party who believes that an evidentiary hearing regarding the consumer surveys is necessary should submit a motion requesting such a hearing by no later than September 27, 1999.

Public Input on Matters to Be Decided in this Proceeding

The OIR invited parties to comment on ways for members of the public to provide their input on matters to be decided in this proceeding. The OIR

suggested full panel hearings, public participation hearings, and roundtable discussions as some possible ways for the Commission to obtain public input.¹²

After having carefully reviewed parties' comments, I have concluded that the best way to obtain public input is to hold roundtable discussions and public participation hearings at the following locations:

<u>Date</u>	<u>Time</u>	<u>Place</u>
June 16, 1999	7 - 10 p.m.	San Diego Council Chambers City Administrative Building 202 C Street, 12th Floor
June 17, 1999	7 - 10 p.m.	Glendale Glendale Civic Auditorium 1401 North Verdugo Road
June 24, 1999	7 - 10 p.m.	San Jose San Jose State University Morris Daily Auditorium 1 Washington Square
June 30, 1999	7 - 10 p.m.	Eureka City Hall Council Chambers 531 K Street.
July 1, 1999	7 - 10 p.m.	Sacramento Sacramento State University Union Auditorium 6000 J Street
July 27, 1999	7 - 10 p.m.	Fresno Fresno Convention Center Wine Room 700 M Street

¹² OIR 98-12-014, mimeo., p. 17.

I will attend the public meetings in San Diego, Glendale, and Sacramento. Commissioner Duque informs me that he will attend the public meetings in Fresno and San Jose.

Each public meeting will begin with a roundtable discussion of approximately one hour in length moderated by a Commissioner, the assigned ALJ, or Commission staff. The remainder of the public meeting will be devoted to a public participation hearing during which members of the public will have an opportunity to voice their opinions on the matters to be decided in this proceeding. Each of the public meetings will be transcribed. Any party who wishes to receive the transcripts should contact the Chief Hearing Reporter by telephone at 415-703-2288.

I invite parties who meet one or more of the following qualifications to submit requests to participate in the roundtable discussions: (1) consumer representative, (2) LEC representative, (3) CLC representative, (4) CMRS representative, (5) elected official (but not a representative of an elected official), (5) internet service provider, (6) small business owner, and (7) large business owner. Parties that do not meet these qualifications may still be allowed participate in the roundtable discussions if they can demonstrate that their participation would be beneficial to the public discourse of area code policy options. In selecting roundtable participants, every effort will be made to ensure representation by proponents of overlays, splits, and measures to conserve telephone numbers.

Persons and parties who wish to participate in the roundtables should submit a written request to assigned ALJ Kenney by June 7, 1999, containing the following information:

- The name, telephone number and e-mail address of the person or persons who will participate in the roundtable discussions.

- The party being represented (e.g., ORA, Pacific Bell, etc.).
- The person's qualifications (e.g., small business owner or LEC representative).
- The roundtable(s) in which the person seeks to participate (e.g., all six roundtables, or only those in San Diego and San Jose).
- Whether the person or party generally favors splits, overlays, and/or measures to conserve telephone numbers.

Once requests to participate in the roundtables have been submitted, the assigned ALJ shall issue a ruling announcing the selection of participants for each of the roundtables.

Need for a Hearing to Receive Legislative Facts

The OIR indicated that a formal hearing would be held for the receipt of legislative facts ("legislative hearing").¹³ I shall instruct the assigned ALJ to issue a ruling setting a legislative hearing on a date after the conclusion of the public participation hearings and the receipt of comments and reply comments, if any, regarding the survey(s) of consumer preferences for splits versus overlays.

Final Oral Arguments

Pursuant to Rule 8(d), parties in a quasi-legislative proceeding have the right to present final oral arguments to a quorum of the Commission. I shall instruct the assigned ALJ to issue a ruling setting a date for parties to file and serve requests for final oral arguments. If such requests are received, the assigned ALJ shall issue a ruling setting final oral arguments on a date after the issuance of a proposed decision in this proceeding.

¹³ OIR 98-12-014, mimeo., pp. 21-22.

Schedule

The schedule for this proceeding is set forth in Appendix A to this ruling. In no event shall a final decision be issued in this proceeding any later than 18 months from the date that OIR 98-12-014 was issued.

Ex Parte Communications and Reporting Requirements

This is a quasi-legislative proceeding. Therefore, pursuant to Rule 7(d), ex parte communications are allowed in this proceeding without restriction or reporting requirement.¹⁴

Pub. Util. Code § 1701.4(a)

Pub. Util. Code § 1701.4(a) requires the assigned ALJ in a quasi-legislative proceeding to act as an assistant to the assigned Commissioner. The statute also requires the assigned Commissioner in a quasi-legislative proceeding to (1) be present for formal hearings, (2) prepare the proposed decision with the assistance of the assigned ALJ, (3) present the proposed decision to the full Commission in a public meeting, and (4) report to the full Commission the number of days of hearing and the number of days that the Commissioner was present at the hearings.

Electronic Copy of Parties' Comments

Each party shall submit to the assigned ALJ by September 29, 1999, an electronic copy of all of the party's comments filed in this proceeding, including: (1) comments filed on February 1, 1999; (2) reply comments filed on

¹⁴ This ruling contains an appealable determination that the category of this proceeding is quasi-legislative. Therefore, the rules for ex parte communications that are applicable to quasi-legislative proceedings shall continue to apply unless and until there is a successful appeal of this ruling's determination of category.

March 5, 1999; (3) any comments that might be filed on September 10, 1999; and (4) any reply comments that might be filed on September 22, 1999. Each party shall submit the electronic copy of its comments in Word for Windows. Parties should submit the electronic copies of their comments on a 3.5-inch disk or by e-mail (tim@cpuc.ca.gov).¹⁵

Therefore, **IT IS RULED** that:

1. This proceeding is categorized as quasi-legislative.
2. The scope of this proceeding is to consider (a) the issues identified in Appendix B of OIR 98-12-014, and (b) Pacific Bell's petition to modify D.96-12-086 in which Pacific seeks significant revisions to the area code policy adopted in that decision. This proceeding will not consider any area code policy options that require changes to the North American Numbering Plan.
3. The assigned ALJ shall rule on the pending motion to include 8-digit dialing in this proceeding.
4. The consumer surveys that the Commission found reasonable in D.96-12-086 shall not be used in this proceeding.
5. Parties may submit surveys of consumer preferences for splits versus overlays by no later than August 31, 1999. Any party that intends to submit a survey shall file and serve a notice of their intent by June 8, 1999. If such notice is filed, then other parties may file and serve a "reply notice" by no later than June 15, 1999, stating their intent to submit a consumer survey.
6. Any party that intends to submit a consumer survey shall adhere to the following principles. First, survey should be based, to the extent practical, on the

¹⁵ Parties may submit the electronic copy of their comments in the following format:
Font: Palatino; Font size: 13; Line spacing: 1.5; Top, bottom, and side margins: 1 inch;
Gutter: 0.0 inches; Header: 0.5 inches; and Footer: 0.5 inches.

surveys that were found reasonable in D.96-12-086. Second, the party conducting the survey shall invite all other parties to a meeting for the purpose of reaching a consensus on the specific questions to be asked in the survey. Third, the survey shall be conducted by neutral professionals. Fourth, the survey shall include a statistically valid sample of consumers from the 310 and 925 NPAs. Finally, the survey shall encompass large and small business customers, as well as rural, suburban, and urban residential customers.

7. If any surveys are submitted, parties may file and serve opening comments regarding the surveys on September 10, 1999, and reply comments on September 22, 1999. The comments shall focus on the relevance of the survey results in deciding whether the primary for implementing area codes should be through the use of geographic splits, the use of overlays, or some combination of these two options. Any party who believes that an evidentiary hearing regarding the consumer surveys is necessary shall submit a motion requesting such a hearing by no later than September 27, 1999.

8. There shall be six public meetings at the times and places specified in Appendix A of this ruling. Each public meeting shall consist of a roundtable discussion followed by a public participation hearing. Any party who wishes to receive the transcripts of the public meetings should contact the Chief Hearing Reporter by telephone at 415-703-2288.

9. The following persons and parties are qualified to participate in the roundtable discussions: (a) consumer representatives, (b) LEC representatives, (c) CLC representatives, (d) CMRS representatives, (e) elected officials (but not a representatives of an elected officials), (f) internet service providers, (g) small business owners, and (h) large business owners. Parties that do not meet these qualifications may also be allowed participate in the roundtable discussions if

they can demonstrate that their participation would be beneficial to the public discourse of area code policy options.

10. Persons and parties who wish to participate in the roundtables should submit a written request to the assigned ALJ by June 7, 1999, containing the following information: (a) the name, telephone number, and e-mail address of the person or persons who will participate in the roundtable discussions; (b) the party being represented (e.g., ORA, Pacific Bell, etc.); (c) the person's qualifications (e.g., small business owner or LEC representative); (d) the roundtables in which the person seeks to participate (e.g., all six roundtables, or only those in San Diego and San Jose); and (f) whether the person or party is generally in favor of splits, overlays, and/or measures to conserve telephone numbers.

11. The assigned ALJ shall issue a ruling identifying the participants for each of the roundtables. The ALJ may include in his ruling the ground rules to govern the conduct of the roundtables.

12. There shall be a formal hearing for the receipt of legislative facts. The assigned ALJ shall issue a ruling that sets this hearing on a date after (a) the public meetings have concluded, and (b) the receipt of written comments, if any, regarding the survey of consumer preferences for split versus overlays.


13. The assigned ALJ shall issue a ruling setting a date for parties to submit requests for final oral arguments. If such requests are received, the assigned ALJ shall issue a ruling that sets a final oral argument before a quorum of the Commission on a date after the issue of the proposed decision.

14. Each party shall submit to the assigned ALJ by September 29, 1999, an electronic copy of all of the party's comments filed in this proceeding, including: (a) comments filed on February 1, 1999; (b) reply comments filed on March 5, 1999; (c) comments that might be filed on September 10, 1999; and

(d) reply comments that might be filed on September 22, 1999. Parties should shall their comments on a 3.5-inch disk or by e-mail (tim@cpuc.ca.gov).

15. The schedule for this proceeding is set forth in Appendix A to this ruling. The schedule is subject to change as circumstances require. In no event shall a final decision be issued in this proceeding any later than 18 months from the date that OIR 98-12-014 was issued.

Dated May 26, 1999, at San Francisco, California.



Josiah L. Neeper
Assigned Commissioner

APPENDIX A
Timetable for Rulemaking 98-12-014

June 1999	ALJ ruling on the motion to include in this proceeding the issue of 8-digit dialing.
June 7, 1999	Written requests to participate in roundtable discussions submitted to the assigned ALJ.
June 8, 1999	Notices of intent to conduct a consumer survey filed and served.
June 15, 1999	Reply notices of intent to conduct consumer survey filed and served.
June 16, 1999 7 - 10 p.m.	Roundtable Discussion & Public Participation Hearing. City Administrative Building, Council Chambers 202 C Street, 12th Floor San Diego, CA 92101
June 17, 1999 7 - 10 p.m.	Roundtable Discussion & Public Participation Hearing. Glendale Civic Auditorium 1401 North Verdugo Road Glendale, CA 91208
June 24, 1999 7 - 10 p.m.	Roundtable Discussion & Public Participation Hearing. San Jose State University Morris Daily Auditorium 1 Washington Square San Jose, CA 95192
June 30, 1999	Roundtable Discussion & Public Participation Hearing. City Hall Council Chambers 531 K Street Eureka, CA 95501
July 1, 1999 7 - 10 p.m.	Roundtable Discussion & Public Participation Hearing. Sacramento State University Union Auditorium 6000 J Street Sacramento, CA 95819

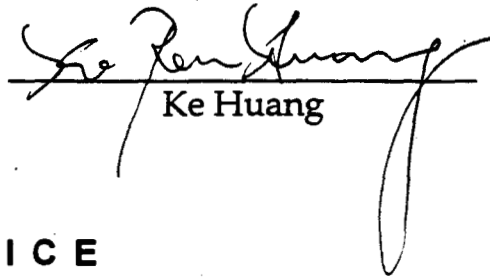
July 27, 1999 7 - 10 p.m.	Roundtable Discussion & Public Participation Hearing. Fresno Convention Center Wine Room 700 M Street Fresno, CA 93721
August 31, 1999	Consumer surveys filed and served.
September 10, 1999	Comments on consumer surveys filed and served.
September 22, 1999	Reply comments on consumer surveys filed and served.
September 27, 1999	Motions for an evidentiary hearing on the consumer surveys filed and served.
September 29, 1999	Electronic copy of each party's comments submitted to the ALJ.
October 12, 1999	Responses to the motions for an evidentiary hearing on the consumer surveys filed and served.
Oct. - December 1999	Legislative hearing. If no consumer surveys are filed, the legislative hearing will be held in September or October 1999, and the portions of this schedule following the legislative hearing will move up accordingly.
Oct. - December 1999	Proceeding submitted. (Rule 8.1(a))
Feb. - March 2000	Proposed decision issued for comment. (Rule 8.1(b))
Feb. - March 2000	ALJ ruling setting date for parties to file and serve requests for final oral arguments.
March - April 2000	Requests to present final oral arguments to a quorum of the Commission filed and served. (Rule 8(d))
March-April 2000	Comments on proposed decision. (Rules 8.1(b) and 77.1-77-6)
April - May 1999	ALJ issues ruling setting date for final oral arguments before a quorum of the Commission.
April -May 2000	Final oral arguments. (Rule 8(d))
May - June 2000	Commission issues final decision. (Rule 8.1(c))

(END OF APPENDIX A)

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of the original attached Scoping Memo and Ruling of the Assigned Commissioner on all parties of record in this proceeding or their attorneys of record.

Dated May 26, 1999, at San Francisco, California.


Ke Huang

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074 or TDD# (415) 703-2032 five working days in advance of the event.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

Rulemaking 98-12-014
(Filed December 17, 1998)

**ADMINISTRATIVE LAW JUDGE'S RULING GRANTING IN PART AND
DENYING IN PART THE PETITIONS TO INTERVENE FILED BY
(1) BILL NEILL, and (2) GILBERT J. YABLON**

This ruling grants the petitions to intervene filed by Bill Neill and Gilbert J. Yablon to the extent their participation in this proceeding is necessary to determine if their proposals for novel dialing arrangements should be formally considered by the Commission in a future proceeding. In all other respects, their petitions to intervene are denied. This ruling also instructs Neill and Yablon to file and serve written comments containing detailed information on their dialing proposals so that the Commission can determine if their proposals merit further consideration in a future proceeding. Parties may also file and serve comments on the dialing proposals.

Ruling on Neill's Petition to Intervene

On May 26, 1999, Bill Neill filed a petition to intervene in this proceeding¹ for the purpose of presenting a "solution" to the "extensive proliferation of area codes in this state." There was no response to Neill's petition.

¹ *Petition to Intervene of Prof Bill Neill, In Pro Per.*

Neill's petition failed to identify any "solution" to proliferation of area codes. However, in a phone call to the assigned Administrative Law Judge (ALJ), Neill stated that his "solution" to the proliferation of area codes is "hexa-decimal dialing." According to Neill, hexa-decimal dialing reduces the need for new area codes by expanding the universe of phone numbers within existing area codes by using six additional "symbols" that are already part of the public telecommunications network. For example, the "star" and "pound" symbols that can be dialed by touch-tone telephones could be used to create the following 7-digit phone number within any of the existing area codes: 703-77*#.

For the following reasons, Neill's petition to intervene is denied to the extent the petition asks the Commission to consider in this proceeding whether to require the use of hexa-decimal dialing. First, the petition provided no information on hexa-decimal dialing. Because of this, it is impossible to make a preliminary determination of whether hexa-decimal dialing is feasible. On the other hand, what little information on hexa-decimal dialing that was provided to the assigned ALJ in a phone call indicates that hexa-decimal dialing may not be feasible. For example, people with rotary phones might not be able to dial hexa-decimal phone numbers that contain "star" or "pound" symbols. Until there is some initial showing that hexa-decimal dialing is feasible - a showing that was completely absent from the petition - it is not prudent for the Commission to use its scarce resources to consider the merits of hexa-decimal dialing.

Second, no party had notice of Neill's true purpose for intervening in this proceeding since Neill's petition failed to mention hexa-decimal dialing. As a result, expanding the scope of this proceeding to consider the adoption of hexa-decimal dialing could be prejudicial to those parties who may have opposed Neill's petition had they known of Neill's true purpose for intervening in this proceeding.

Finally, in Order Instituting Rulemaking 98-12-014, the Commission stated that it would not consider in this proceeding any proposals that require changes to the North American Numbering Plan (NANP)² since implementation of such proposals is beyond the Commission's jurisdiction.³ Since Neill's petition is devoid of information on hexa-decimal dialing, it is impossible to determine if hexa-decimal dialing conforms with the NANP, and, therefore, is a matter within the scope of this proceeding.⁴ Consequently, Neill has failed to meet his burden under the Commission's Rules of Practice and Procedure (Rules) to demonstrate that he seeks to intervene in this proceeding on matters that are reasonably pertinent to scope of this proceeding.⁵

Although Neill's petition to intervene is denied to the extent it asks the Commission to consider in this proceeding whether to implement hexa-decimal dialing, Neill shall have an opportunity to demonstrate that the Commission should consider in a future proceeding whether to implement hexa-decimal

² The NANP is the numbering plan for the public switched network. Telephone numbers used by the NANP consist of NXX-NXX-XXX, where "N" is any digit 2-9, and "X" is any digit 0-9. (http://www.nanpa.com/nanpa_info/index.html)

³ OIR 98-12-014, mimeo., pp. 1, 21, Ordering Paragraph 1, and Appendix B.

⁴ Although Neill seems to suggest in his petition that hexa-decimal dialing would not require changes to the NANP, the validity of this suggestion is questionable given that telephone numbers in common use under the NANP do not include "symbols."

⁵ Neill's filed his petition pursuant to Rule 53 which states: "petitions to intervene...shall set forth the grounds of the proposed intervention, [and] the position and interest of the petitioner in the proceeding ...Leave will not be granted except on averments which are reasonably pertinent to the issues already presented, but do not unduly broaden them." Although Rule 53 applies only to complaint proceedings, the Commission has often used Rule 53 for guidance in determining whether parties should be permitted to intervene in other types of proceedings.

dialing. To this end, Neill shall file and serve written comments that contain the all of the following information:

- A thorough description of hexa-decimal dialing.
- A thorough explanation of how and why hexa-decimal dialing would alleviate the proliferation of area codes.
- A statement of whether hexa-decimal dialing conforms with the NANP. If Neill asserts that hexa-decimal dialing conforms with the NANP, he must present evidence and arguments in his comments that support this assertion.
- A statement of whether the Commission has authority to implement hexa-decimal dialing. If Neill asserts that the Commission has such authority, he must present evidence and arguments in his comments that support this assertion, including why the Commission's authority is not preempted by the Federal Communications Commission (FCC) pursuant to § 251(e) of the Telecommunications Act of 1996 (the Act).⁶
- A detailed showing that hexa-decimal dialing is a feasible solution to the proliferation of area codes. This showing should address the following factors: (1) the scope of changes to the telecommunications network (e.g., switch modifications) that are required to implement hexa-decimal dialing; (2) the cost to telephone companies to implement hexa-decimal dialing; (3) the cost to the public to implement hexa-decimal dialing; (4) customer confusion, customer education, and the cost of customer education; (4) compatibility with existing and planned "split" and "overlay" area codes; and (5) compatibility with existing telephones (e.g., whether rotary phones can dial "hexa-symbols," and whether touch-tone phones can dial more than two of the hexa-symbols).

⁶ § 251(e) of the Act states that the FCC "shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the [FCC] from delegating to State commissions or other entities all or any portion of such jurisdiction."

- A thorough explanation as to whether hexa-decimal dialing is compatible with local number portability.
- A thorough explanation as to whether hexa-decimal dialing is compatible with number conservation measures, such as number pooling and rate center consolidation.
- Whether hexa-decimal dialing can be used in conjunction with 8-digit dialing described later in this ruling.

Neill shall file and serve his written comments on July 23, 1999. Parties may file and serve reply comments on August 6, 1999. Neill and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use the comments to decide whether, and to what extent, hexa-decimal dialing merits consideration in a future proceeding.

Consistent with the previous discussion, Neill's petition to intervene is granted to the limited extent of allowing him to participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider hexa-decimal dialing in a future proceeding.

Ruling on Yablon's Petition to Intervene and Motion to Have the Commission Consider 8-Digit Dialing

On May 4, 1999, Gilbert J. Yablon filed (1) a petition to intervene in this proceeding,⁷ and (2) a motion to have the Commission consider in this proceeding whether 8-digit dialing should be used in Numbering Plan Areas (NPAs) subject to overlays.⁸ There were no responses to Yablon's petition or motion (referred to individually and collectively hereafter as the "petition").

⁷ *Motion to Intervene of Gilbert J. Yablon.*

⁸ *Motion to Have the Commission Consider "A Simplified Dialing System for Overlaid Area Codes" AKA "The Unified Dialing Plan for Overlays" filed by Gilbert J. Yablon of SMART Dialing Systems.*

Yablon states in his petition that 8-digit dialing would be used in lieu of 1+10-digit dialing to make calls within an NPA subject to "overlays" (i.e., NPAs served by two or more area codes). For example, to place calls within an NPA served by two area codes, a caller using 8-digit dialing would dial the 7-digit phone number plus the suffix digits of "zero" or "one" (e.g., 703-4567-0 or 703-4567-1) to reach a number in the first or second area code, respectively.

For the following reasons, Yablon's petition is denied to the extent the petition asks the Commission to consider in this proceeding whether to require the use of 8-digit dialing. First, Yablon does not address in his petition whether 8-digit dialing complies with the NANP and, therefore, is a matter within the scope of this proceeding.⁹ Consequently, Yablon has failed to meet his burden under the Commission's Rules to demonstrate that he seeks to intervene in this proceeding on matters that are reasonably pertinent to scope of this proceeding.¹⁰

Second, Yablon states that 8-digit dialing has been through two "telecommunications industry reviews" in which "[i]ndustry experts refuted the 'need for' and 'value of'" 8-digit dialing due to concerns about costs, switch modifications, and customer education. Yablon dismisses these concerns, but he provided no information that convincingly demonstrates the concerns are unwarranted. Therefore, before the Commission commits its limited resources to

⁹ Yablon states in his petition that 8-digit dialing does "not alter the 10-digit structure of the North American Numbering Plan," but this statement does not address the issue of whether 8-digit dialing complies with the NANP.

¹⁰ Rule 53 states: "Leave [to intervene] will not be granted except on averments which are reasonably pertinent to the issues already presented, but do not unduly broaden them." Although Rule 53 applies only to complaint proceedings, the Commission has often used Rule 53 for guidance in determining whether parties should be allowed to intervene in other types of proceedings.

seriously considering the adoption of 8-digit dialing, Yablon needs to make a more convincing showing that the concerns about the feasibility of 8-digit dialing are unwarranted.

Although Yablon's petition to intervene is denied to the extent the petition asks the Commission to consider the adoption of 8-digit dialing, Yablon shall have an opportunity to demonstrate in this proceeding that 8-digit dialing is feasible and worthy of serious consideration by the Commission in a future proceeding. To this end, Yablon shall file and serve written comments that contain the all of the following information:

- A thorough description of 8-digit dialing.
- A statement of whether 8-digit dialing conforms with the NANP. If Yablon asserts that 8-digit dialing conforms with the NANP, he must present evidence and arguments in his comments that support this assertion.
- A statement of whether the Commission has authority to implement 8-digit dialing. If Yablon asserts that the Commission has such authority, he must present evidence and arguments in his comments that support this assertion, including why the Commission's authority is not preempted by the FCC pursuant to § 251(e) of the Act.¹¹

¹¹ § 251(e) of the Act states that the FCC "shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the [FCC] from delegating to State commissions or other entities all or any portion of such jurisdiction."

- A detailed showing that 8-digit dialing is feasible. This showing should address the following factors: (1) the scope of changes to the telecommunications network (e.g., switch modifications) that are required to implement 8-digit dialing; (2) the cost to telephone companies to implement 8-digit dialing; (3) the cost to the public to implement 8-digit dialing, (4) customer confusion, customer education, and the cost of customer education; and (4) compatibility with existing and planned overlays.
- A thorough explanation as to whether 8-digit dialing is compatible with local number portability.
- A thorough explanation as to whether 8-digit dialing is compatible with number conservation measures, such as number pooling and rate center consolidation.
- A description of the two telecommunications industry reviews of 8-digit dialing. Yablon shall append to his comments a copy of any formal reports and/or findings that resulted from these reviews. Yablon may also provide information that demonstrates why the concerns raised in the industry reviews are unwarranted.
- Whether 8-digit dialing can be used in conjunction with haxa-decimal dialing described earlier in this ruling.

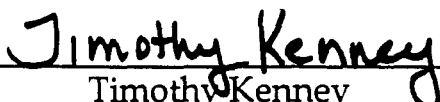
Yablon shall file and serve his written comments on July 23, 1999. The parties may file and serve reply comments on August 6, 1999. Yablon and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use the comments to decide whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.

Consistent with the previous discussion, Yablon's petition is granted to the limited extent of allowing him to participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.

IT IS RULED that:

1. Neill may participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider hexa-decimal dialing in a future proceeding.
2. Neill's petition to intervene in this proceeding is granted to the extent set forth in Ruling Paragraph 1. In all other respects, Neill's petition is denied.
3. Yablon may participate in this proceeding on the single matter of whether, and to what extent, the Commission should consider 8-digit dialing in a future proceeding.
4. Yablon's petition to intervene in this proceeding and motion to have the Commission consider 8-digit dialing in this proceeding are granted to the extent set forth in Ruling Paragraph 3. In all other respects, Yablon's petition and motion are denied.
5. Neill and Yablon shall each file and serve written comments on July 23, 1999, containing the information specified in the body of this ruling. The parties may file and serve reply comments on August 6, 1999. Neill, Yablon, and the parties may file and serve a final round of comments on August 20, 1999. The Commission will use these comments to decide whether, and to what extent, hexa-decimal dialing and/or 8-digit dialing will be considered in a future proceeding.

Dated June 29, 1999, at San Francisco, California.

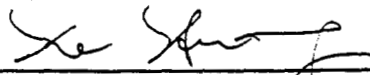


Timothy Kenney
Administrative Law Judge

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of the original attached Administrative Law Judge's Ruling Granting in Part and Denying in Part the Petitions to Intervene Filed By (1) Bill Neill, and (2) Gilbert J. Yablon on all parties of record in this proceeding or their attorneys of record.

Dated June 29, 1999, at San Francisco, California.



Ke Huang

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

R 98-12-014
(Filed December 17, 1998)

**COMMENTS OF GILBERT J. YABLON REGARDING 8-DIGIT DIALING FOR
OVERLAYS, FILED PURSUANT TO ADMINISTRATIVE LAW JUDGE TIMOTHY
KENNEY'S RULING OF JUNE 29, 1999**

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Rd.
Woodland Hills, CA 91364
Telephone: (818) 999-1070
Facsimile: (818) 956-3298
E-mail: unified1@pacbell.net

July 23, 1999

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

R 98-12-014
(Filed December 17, 1998)

**COMMENTS OF GILBERT J. YABLON REGARDING 8-DIGIT DIALING FOR
OVERLAYS, FILED PURSUANT TO ADMINISTRATIVE LAW JUDGE TIMOTHY
KENNEY'S RULING OF JUNE 29, 1999**

The June 29, 1999 ruling by Administrative Law Judge Timothy Kenney instructed me to provide comments and detailed information pertaining to my May 4, 1999 *Motion to Have the Commission consider "A Simplified Dialing system for Overlaid Area Codes" AKA "The Unified Dialing Plan for Overlays"* (hereafter referred to as the "plan," the "8-digit overlay", the "SMART Overlay" or "the system").

Judge Kenney specified that I provide information on the following topics:

- A thorough description of 8-digit dialing.
- A statement of whether 8-digit dialing conforms with the NANP. If Yablon asserts that 8-digit dialing conforms with the NANP, he must present evidence and arguments in his comments that support his assertion.
- A statement of whether the Commission has authority to implement 8-digit dialing. If Yablon asserts that the Commission has such authority, he must present evidence and arguments in his comments that support this assertion, including why the Commission's authority is not preempted by the FCC pursuant to 251(e) of the act.
- A detailed showing that 8-digit dialing is feasible. This showing should address the following factors: (1) the scope of changes to the telecommunications network (e.g., switch modifications) that are required to implement 8-digit dialing; (2) the cost to telephone companies to implement 8-digit dialing; (3) the cost to the public to implement 8-digit dialing; (4) customer confusion, customer education, and the cost of customer education; and (5) compatibility with existing and planned overlays.

- A thorough explanation as to whether 8-digit dialing is compatible with local number portability.
- A thorough explanation as to whether 8-digit dialing is compatible with number conservation measures, such as number pooling and rate center consolidation.
- Whether 8-digit dialing can be used in conjunction with hexa-decimal dialing [as proposed by Bill Neill].
- A description of the two telecommunications industry reviews of 8-digit dialing [that were previously conducted]. Yablon shall append to his comments a copy of any formal reports and / or findings that resulted from these reviews. Yablon may also provide information that demonstrates why the concerns raised in the industry reviews are unwarranted.

I will address these issues in the order listed above.

- **A Thorough Description of 8-Digit Dialing:**

Background:

Before describing the 8-digit overlay dialing system, it is important to first establish the need for implementing it.

Until recently, area code relief was almost always provided through the use of area code splits. But splits are disruptive, frustrating and expensive for customers because they require half of the subscribers in a region to give up their established telephone numbers. Customer dissatisfaction with the splitting technique prompted overlays to be developed as an alternative.

Unlike area code splits, overlays can provide area code relief without requiring customers to change their phone numbers. This would seem to be a great advantage, but the requirement that 10-digits (or 1+10-digits) be dialed for all overlay calls has delivered a new form of disruption, frustration and expense to telephone users anyway. For customers, it merely seems like one set of problems has been exchanged for another, but going back to using disruptive area code splits in order to avoid overlay related problems is not a satisfactory solution. The problems have resulted from the way that overlays are currently implemented. Fortunately these problems can be resolved by enhancing overlays with some consumer friendly modifications.

The Plan:

The 8-digit dialing system for overlays resolves overlay related dialing problems by providing customers with two tools to make living with overlays easier. First, it offers a shortcut "8-digit method" for dialing 10-digit (or 1+10-digit) telephone numbers within the region; and second, it prevents calls dialed with only 7-digits from being rejected.

To make eight-digit dialing possible, telephone companies would assign a one-digit identifier to each area code in the overlay region. Customers could then dial local 7-digit telephone numbers and use an 8th digit to identify the area code. For example, the 310 area code would be identified by "0" and the "424" area code would be identified by "1". Dialing 1234567-0 would direct the call to the 310 area code, and dialing 1234567-1 would direct the call to the 424 area code. Telephone numbers in future overlaid area codes in the region could be dialed using 1234567-2, 1234567-3, etc.¹

Telephone company equipment would be modified to expect 8-digits to be dialed. After the 8th digit is entered, the equipment would determine which area code has been selected. The 8-dialed-digits would then be converted to the proper 1+10-digit telephone address before being passed through the switch. The number enters the network as if the customer had originally dialed it as 1+10-digits.

But what happens when a customer or auto-dialer enters only 7-digits? In a "standard overlay", customers hear an announcement directing them to hang-up and redial using 1+10-digits -- a huge inconvenience (and a disruptive dead-end for auto-dialers programmed with only 7-digits). But with the 8-digit overlay, customers who forget about (or don't know about) the 8th digit would hear an announcement after a few seconds to help them complete their calls:

*"To reach the 310 area code, dial "0" now. To reach 424, dial "1" now."*²

¹ Dialing with "area code selectors" in this manner would not require changes to the North American Numbering Plan. The new 8th digit is merely used for dialing purposes and does not become a part of the actual NANP telephone address (see ATTACHMENT 1).

² This is only one of several ways that the 8-digit protocol might be implemented. Different timing intervals and/or other announcement wording might be more appropriate. Focus group testing might even demonstrate that no announcement is needed at all (see ATTACHMENT 2A for full description of a version of the plan that may not need to use announcements).

Customers would have a few more seconds to enter the 8th digit, and after doing so their calls would be routed to the selected area code.³

Even if a customer used an auto-dialer programmed with only a 7-digit number, the 8th digit could be entered manually by the customer either before, during or after the announcement.

If for some reason the "8th digit" is still not entered, the call would default to the original area code of the region (in this case the 310 area code).⁴ This default "safety-net" reduces the need for customers to reprogram or replace automated dialing devices (such as security building entry systems and other unattended auto-dialers)⁵, and minimizes the kind of disruption that occurs when "standard overlays" are implemented. It also ensures that calls made by children or other people who might only know an established number as 7-digits, will not be rejected.

Calls "to" and "from" area codes that are outside of the 8-digit overlay region will continue to require 1+10-digits to be dialed (the same as was required before the overlay).⁶

³ There is no need to wait for the announcement before entering the 8th digit. Customers who are already aware of the plan would probably never hear this announcement since entry of the 8th digit would signal that the dialing string is complete, and the announcement would not be triggered.

⁴ The "original" area code appears to be the logical choice to use for the default since the "original" area code would be the only area code in the region where 7-digit numbers had ever been valid. Calls to the newer area codes would never have been programmed or dialed with 7-digits since 8-digit or 1+10-digit dialing would always have been the only ways to dial these numbers. If a call is dialed with only 7-digits, telephone company equipment could assume with relative certainty that the call is intended for the "original" area code. A call of this type would have probably come from a pre-programmed auto-dialer, or would have been dialed by a child or someone who only knows the telephone number as 7-digits. Even though these types of calls can be completed by dialing only 7-digits, no dialing advantage is actually provided. Customers from all of the area codes within the region can dial these numbers in the same manner, and, the long delay after entering the 7th digit actually makes this a disadvantageous way to dial. Eight-digit calls and even 1+10-digit calls can be completed more efficiently. The true purpose for allowing 7-digit calls to default to the original area code is to prevent customers who already have an investment in the original area code from being penalized by a change to the dialing plan.

⁵ This turned out to be a real problem in the 310 overlay. See ATTACHMENT 6 for an L.A. Times article on the subject.

⁶ If the new "area code identifier" is inadvertently entered at the end of a 1+10-digit call, the identifier is ignored and the call completes to the 1+10-digit number that was dialed.

Customers always have the option of dialing 1+10-digits if they want to (even for local calls within the overlay region), but the 8-digit shortcut should make local calls easier for most customers.⁷

Variations:

This 8-digit overlay system can be adapted to any region within the NANP. It will work regardless of whether the dialing pattern to neighboring area codes requires 1+10-digit dialing (as in California) or 10-digit dialing (as is the case in most other parts of the NANP).

In regions where standard overlays have already been implemented, the 7-digit default "safety-net" may not be necessary. Since all 7-digit dialing patterns would have already been disrupted and abandoned, there would be no reason to preserve it. However, the 8-digit dialing feature could be offered by itself, and would provide customers in established overlay regions with an easier way to dial.

Implications:

Not only does the 8-digit dialing format require fewer digits to be dialed, but the dialing order of the number will also help to prevent misdials and customer frustration. In standard overlays, for instance, many customers habitually dial familiar 7-digit numbers and end up having to re-dial using 1+10-digits. In the 8-digit overlay, habitual dialing of 7-digit numbers is not a problem. After dialing 7-digits, customers enter the one-digit area code selector. If they forget, the announcement will remind them, and the call will be completed without frustration. Since 1+10-digit dialing is also supported for all calls, customers will never have to hang up and redial -- regardless of the format they begin dialing with.

The 7-digit default "safety-net", while offering no dialing advantage (because of the long delay), provides a way for calls from unattended auto-dialers to complete without reprogramming or replacement. Backward compatibility with previously established dialing patterns is maintained, minimizing customer frustration and expense.

⁷ Refer to ATTACHMENTS 2A and 2B for more details about this 8-digit dialing system for overlays.

The Commission's recent experience with the 310 overlay demonstrates that overlays can be a source of hardship and frustration for telephone users. The Commission also has vast experience with customers who are dissatisfied with area code splits -- which is why overlays have been considered in the first place. In their current form, neither relief option provides a satisfactory solution for telephone customers. In light of the above, investigation and consideration of the 8-digit overlay seems reasonable because it offers a way to implement area code relief with virtually no disruption, hardship or customer frustration.

A Statement Of Whether 8-Digit Dialing Conforms With The NANP. If Yablon Asserts That 8-Digit Dialing Conforms With The NANP, He Must Present Evidence And Arguments In His Comments That Support His Assertion.

Statement:

This 8-digit dialing system for overlays does not alter the ten-digit structure of the NANP in any manner, and therefore the plan does completely conform with the North American Numbering Plan.⁸ The new 8th digit is only used for dialing and does not become part of the actual NANP telephone address.

The NANP is a numbering plan -- not a dialing plan, and though its format suggests logical groupings by which telephone numbers may be dialed, there appear to be no universal rules that define how NANP numbers must be dialed.

Evidence and Arguments:

The following description was taken directly from the NANPA website:

The NANP is the numbering plan for the Public Switched Telephone Network in the United States and its territories, Canada, Bermuda, and many Caribbean nations, including Anguilla, Antigua & Barbuda, Bahamas, Barbados, British Virgin Islands, Cayman Islands, Dominica, Dominican Republic, Grenada, Jamaica, Montserrat, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Trinidad and Tobago, and Turks & Caicos.

*NANP numbers are ten digits in length, and they are in the format:
XXX-XXX-XXXX*

⁸ See ATTACHMENT 1 for a statement, from a telecommunications industry numbering expert, which substantiates the claim that 8-digit overlays conform with the NANP.

Where N is any digit 2-9 and X is any digit 0-9. The first three digits are called the numbering plan area (NPA) code, often called simply the area code. The second three digits are called the central office code or prefix. The final four digits are called the line number.

Regional dialing plans have often been tailored to the specific needs of the communities where the NANP is implemented, as the following examples illustrate.

- In California, NANP numbers are typically dialed in the following formats:
1 + NXX-NXX-XXXX (1 + the full ten digit number)
NXX-XXXX (just the "prefix" and the "line number" -- the last seven digits).
- However, in most other states the dominant dialing format is as follows:
NXX-XXXX for non-toll calls within the same area code.
NXX-NXX-XXXX for non toll calls to a neighboring area code.
1+NXX-NXX-XXXX for all toll calls, regardless of area code.
- And until recently, in many regions local calls to neighboring area codes could be dialed with just 7-digits -- the area code was not required unless the call was a toll call. This dialing feature was made possible through the use of "protected codes".
- In some rural areas of the NANP there are regions where a single prefix serves an entire rate center. In these regions telephone numbers are sometimes dialed in the following format:
XXXX (just the "line number" -- the last four digits).
- And, when there are only a few prefixes in a region, 5-digit dialing is sometimes permitted:
X-XXXX (just the last digit of the "prefix" and the four digit "line number")
- Other types of dialing are supported by many telephone companies through the use of "custom calling services". For instance "speed calling" is a "custom calling service" that lets subscribers dial calls by using only one-digit or one-digit and the "#" key, and in the near future voice recognition may allow calls to be dialed without entering any digits.

Clearly, there has always been a focus on finding ways to minimize the number of digits that customers are required to dial. The way that overlays are currently implemented is actually a departure from tradition. Customers would clearly prefer to dial fewer than 10-digits for overlay calls, and the 8-digit overlay provides a way -- within the numbering constraints of the NANP -- to do it.

A Statement Of Whether The Commission Has Authority To Implement 8-Digit Dialing. If Yablon Asserts That The Commission Has Such Authority, He Must Present Evidence And Arguments In His Comments That Support This Assertion, Including Why The Commission's Authority Is Not Preempted By The FCC Pursuant To Section 251(e) Of The Act.

Statement:

The 8-digit dialing system for overlays is a local dialing plan, and does not affect dialing or switching anywhere outside of the region where the plan might be implemented. All costs and modifications to equipment are also confined to the local region, and the plan does not require altering the 10-digit format of the NANP in any manner. The way the plan works is similar to the way a "custom calling service" works. It can be thought of as a feature that would be added to the services available in a California overlay region, and would have no more impact on the rest of the telecommunications network than a simple feature like "Speed Calling" or "Repeat Dialing".

Because the impact of the 8-digit overlay is local in nature, and isolated from the rest of the telecommunications network, the California Commission may already have the authority to implement it. However, there is one issue that may or may not have to be addressed first.

Section 251(e) of the Act pertains to "Numbering Administration" and "Number Pooling", and does not make reference to the FCC's authority concerning how numbers may be dialed.⁹ The only dialing restrictions implied anywhere by the Act pertain to the issue of "dialing parity".

Dialing parity is a mandate requiring telecommunications providers to ensure that all customers within a region have equal access to all telecommunications services, regardless of which service provider the customer subscribes to. This "equal access to services" mandate extends to "equal dialing for services", in that no subscriber in a region should have to dial any extra digits to obtain an equal service.

Overlays presented a dilemma for the FCC. Even though 10-digit (or 1+10-digit) dialing is currently necessary for calls between area codes in an overlay, there is no technical reason why 7-digit dialing can't be used for calls within the individual area codes of the overlay. But the FCC determined that allowing this type of dialing pattern within

⁹ see ATTACHMENT 3 for the full text of Section 251(e) of the act. No reference is made to restrictions pertaining to dialing plans in that section.

overlays would violate the mandate for dialing parity -- customers would have to do something extra in order to dial customers or services that were not within their own area code. Many competitive and regulatory issues would be triggered by the dialing inequity that 7-digit / 10-digit overlays would create. To resolve this dialing imbalance, the FCC mandated dialing parity for overlays. The only tool available at that time for providing dialing parity in an overlay was to require mandatory 10-digit (or 1+10-digit) dialing for all calls.

Unfortunately, solving the dialing parity problem for service providers created a dialing hardship for subscribers. The 8-digit overlay, which was not available to the FCC when 10-digit dialing was mandated, solves the dialing parity problem without creating dialing hardship.

In March of 1998, I contacted the FCC's Common Carrier Bureau and inquired how to go about requesting that the FCC modify the 10-digit mandate. I spoke with Ms. Erin Duffy and Mr. Greg Cooke. I told them that I had developed an alternate way of providing dialing parity in overlays which would only require 8-digits to be dialed. They researched procedures, and Mr. Cooke later informed me that the FCC constantly considers new information and technologies that have a bearing on previous decisions. Mr. Cooke said that there are two avenues by which the FCC could be petitioned to consider a waiver on their 10-digit ruling. One avenue would be through a request from the North American Numbering Council (NANC) and the other avenue would be a request from a State Commission.

After obtaining this information I contacted the Telecommunications Division of the CPUC, and spoke with Ms. Risa Hernandez. I requested assistance in pursuing the waiver. Ms. Hernandez did some research and informed me that she had spoken with Mr. Cooke, and that he confirmed what I had told her.

If the California Commission does not currently have the authority to implement the 8-digit overlay, a petition could be filed with the FCC requesting a waiver of the 10-digit requirement in order to implement an 8-digit system that achieves the same dialing parity goal (with less customer discontent).

A Detailed Showing That 8-Digit Dialing Is Feasible. This Showing Should Address The Following Factors: (1) The Scope Of Changes To The Telecommunications Network (E.G., Switch Modifications) That Are Required To Implement 8-Digit Dialing; (2) The Cost To Telephone Companies To Implement 8-Digit Dialing; (3) The Cost To The Public To Implement 8-Digit Dialing; (4) Customer Confusion, Customer Education, And The Cost Of Customer Education; And (5) Compatibility With Existing And Planned Overlays.

Statement of Feasibility:

Another name for the 8-digit overlay is "SMART" (Simplified Multi Area Code Region Telephony). All that it does is provide a simplified way to dial ordinary 10-digit telephone numbers in regions that have more than one area code (i.e., overlays). The SMART Overlay was designed to work within the current capabilities of the telecommunications network. It does not depend on developing new technologies, does not alter the 10-digit format of the NANP, and could be implemented in a short time frame and at a reasonable cost.¹⁰

Brief Operational Overview:

In SMART Overlay regions, telephone companies will assign a single digit to each area code in the region. Then, customers can dial normal 7-digit numbers, and use an 8th digit to select the area code. Using this system, up to ten overlaid area codes (0-9) can be addressed in each overlay region, and customers can dial just 8-digits for all calls within their region.

SMART works like a custom calling service. The service is triggered when telephone company equipment determines that an 8-digit number is being dialed. This test will be simple to implement, as it is the same test that is currently used to determine whether a 7-digit number is being dialed.

After the 8th digit is received, telephone company equipment examines the 8th digit to determine which area code the customer specified (referencing a simple ten entry lookup table). The equipment then converts the 8-dialed-digits into the "specified area code" + "7-digit number" (or 1 + "specified area code" + "7-digit number"), and

¹⁰ see ATTACHMENT 1 for expert statement regarding technical viability.

introduces the number to the network as if it had been originally dialed as a 10-digit (or 1+10-digit) number.

Announcements could be provided after the 7th digit to educate people who are unfamiliar with the plan. The announcement could instruct customers how to enter the area code selector digit. The following is an example of a announcement that could be used: *To reach the 310 area code, dial "0" now. To reach 424, dial "1" now.*

If the 8th digit is not entered after a few more seconds, the call could be completed to the "original" area code, or, if regulators prefer, the call could be rejected as incomplete. If 7-digit calls are allowed to complete it would help minimize the disruption that normally accompanies area code splits and overlays. Preserving the established 7-digit dialing pattern in this manner would provide a "safety-net" to ensure that calls made by pre-relief unattended auto dialers would not be lost. It could also ensure that calls made by children or others who only know the number as 7-digits will still be able to complete. Even though calls of this nature can be made with only 7-digits, there would be no advantage to intentionally dialing this way. Because of the long delay (10 to 20 seconds after the 7th digit) it is more expedient to simply enter the 8th digit (even 1+10-digits would be faster). The only reason for offering this feature is to keep customers who already have an investment in the original area code (auto-dialers, security entry systems, etc.) from being penalized because of a dialing pattern change.

Scope of Changes to the Telecommunications Network:

As noted earlier in this document, any modifications to the telecommunications network that this plan might require, would be confined to the local regions where the plan is implemented. The exact modifications will depend on the specific equipment that is currently being used in the region. Since SMART is designed to be used with overlays, much of the work has already been done. The telecommunications industry has already designed "Multi Area Code Region Telephony", and all that SMART will do is simplify it. Telephone company equipment will have to be modified to support the following functions:

- 1) Create a ten entry lookup table, in which each area code in the overlay is given a one-digit identifier (there would be enough room for ten overlaid area codes 0-9).
- 2) Determine if an 8-digit number is being dialed, using the same system or logic that currently recognizes 7-digit numbers.
- 3) If necessary, provide an announcement after the 7th digit instructing those unfamiliar with the plan how to complete the call.
- 4) If the 8th digit does not get entered, assume that the 8th digit is "0" (this would force a default to the "original" area code).
- 5) Compare the 8th digit to the lookup table and determine which area code has been selected.
- 6) Convert the 8-dialed digits into a 10-digit number (or 1+10-digit number).
- 7) Send the number through the switch as if it had originally been dialed as 10-digits or 1+10-digits.
- 8) From this point on SMART has no impact on the network - it merely serves as a dialing helper.

It may very well be that the entire functionality of SMART could be provided in the same manner that "custom calling services" are currently provided. Companies like Lucent and Nortel could provide this functionality as an option in their switches or switching software.

It may also be the case that the functionality could be provided through the use of an intelligent peripheral that would be connected to existing switches.

Clearly there are many ways that the network modifications might be implemented. Though there has been a lot of resistance to this proposal from the telecommunications industry, several industry experts have indicated that this plan is technically workable, and that it could be "relatively simple" to implement. However, the exact methods and costs cannot be determined until a comprehensive technical evaluation and cost analysis is conducted by the telecommunications industry themselves.¹¹

Wireless Considerations:

¹¹ see ATTACHMENT 1 for a telecommunications industry expert's evaluation.

It may require even less effort for wireless carriers to implement the 8-digit overlay. Since wireless customers transmit all of their dialed digits to the carrier at the same time, wireless telephone company equipment can immediately determine how many digits the customer has dialed, and act accordingly.

Recording and Billing Equipment Issues:

SMART acts as a pre-filter for dialing purposes only (much like the speed dialing feature that is built into many telephone company switches). The 8-dialed digits are converted to standard 10-digit (or 1+10-digit) telephone numbers before any of the digits are actually presented to the network for recording or billing services. Therefore SMART has no impact on these services.

Scope of Changes to CPE (Customer Provided Equipment):

One of the main advantages of this plan is that it minimizes the impact on devices such as speed dialers, burglar alarms, and auto dialers because it minimizes the need for reprogramming. With other forms of area code relief reprogramming is necessary if the numbers that were previously programmed are split off into a new area code, or when 7 digit numbers need converting to 10 or 1+10 (as would be the case if a standard overlay were implemented).

In many cases, a PBX or telephone key system might be unaffected by the plan since the suffix logic is handled at the network switch level. Some PBX software changes might be necessary to enable inspection and conversion of the 8th digit, or to allow release of the 8th digit. This might actually be less disruptive to a PBX than the changes that are necessary after a traditional area code split. Any problems that are caused may well be less significant than those created by recent changes that have been made to the NANP, i.e. PBX problems caused by 2-9 being used for the second digit of an area code and 0-1 being used for the second digit of a prefix.

Costs:

All forms of area code relief have costs associated with them. The measurable costs include telephone company costs, direct costs to local business, and direct costs to the

public. Loss of convenience (resulting in greater hardship) should also be factored in when evaluating the overall impact of a specific area code relief technique.

It is estimated that a single area code split costs local businesses between 20 and 40 million dollars, and the phone companies spend another 6 to 10 million per split. Some businesses indirectly lose revenues due to number changes, and the disruptive nature of the splitting technique has created hardship for businesses and consumers alike. All of this makes area code splitting a very expensive and undesirable relief option.¹²

Overlays are relatively new, and it is not yet clear what the overall cost of an overlay might be. In the long run it appears that overlays might be somewhat less expensive than area code splits, but it is clear that overlays do generate some immediate expenses as well as permanent inconveniences.¹³ Recent experience with the 310 overlay reveals where some of the immediate costs come from. Burglar alarms, security building entry systems, elevator telephones, and every other type of auto-dialing device required reprogramming and / or replacing. Many small business and consumers spent a full day or two of lost productivity getting all of their telephone and computer equipment functioning properly with 1+10-digit dialing. And, the lingering inconvenience and frustration that has resulted from mandatory 1+10-digit dialing has taken an emotional and financial toll on the 310 community as well as state and city governments and the CPUC. The overall cost of the 310 overly will probably approach twenty to forty million dollars even though in theory overlays should be less expensive.

Given the current cost of the alternatives, the SMART Overlay has a pretty big budget to work with. Only the telecommunications industry will be able to determine the exact costs for implementing 8-digit overlays. In making their cost evaluation, the industry should determine the cost for the first SMART implementation (which would include system analysis, developing the software protocols and the actual cost for implementation), and then should determine what the cost of future SMART

¹² see ATTACHMENT 7 and 8 for an articles covering costs and disruption due to area code splits.

¹³ see ATTACHMENT 6 for an article on unexpected overlay costs.

implementations would be. Evaluating both of these figures together will determine the cost effectiveness of the plan.

Consumer group studies will help to determine the impact that the 8-digit overlay will have on local business and the public. However, given that the 8-digit overlay resolves many of the problems that customers face with area code splits and standard overlays, the cost to the public, both financial and emotional, should be minimal.

Clearly, with area code splits and standard overlays the public has been saddled with the majority of the overall costs. And in the long run, the public even ends up paying for the industry's costs as well. If analysis shows that the cost of the 8-digit overlay would not be significantly different than the cost of the alternatives, shouldn't the 8-digit overlay be considered as an option? That way the public would finally get some benefit from the money it spends on area code relief.

Customer Confusion:

Though the 8-digit overlay is different than current relief options, customer confusion might actually be less of a problem than it is with area code splits and standard overlays.

The concept of 8-digit dialing seems to be an intuitive solution that individuals constantly suggest as a way to resolve number shortages. ATTACHMENT 9 is a collection of Letters-to-the-Editor, all of which describe variations on the theme of 8-digit dialing. Unlike the 8-digit overlay, the plans described in these letters would involve expanding the format of the North American Numbering Plan (and therefore cannot be implemented at this time), however, providing new numbers in this manner makes immediate sense to the same subscribers who are baffled by the disruptive effects of area code splits and standard overlays. I don't recall ever seeing letters that sing praises for either of our current options, but I have seen many letters that ask "why are we doing it this way?"

The 8-digit overlay gives customers what they have been asking for -- everyone gets to keep their existing phone numbers and they only have to dial one extra digit for calls within their regions. Implementation of the 8-digit overlay is not hampered by the

same restrictions that apply to 8-digit plans that alter the 10-digit NANP address, and therefore it offers a technically workable way to provide area code relief with a minimum of disruption and customer confusion.

Even customers who are totally unaware of the new 8-digit dialing pattern would be able to complete calls without redialing. The announcement following the 7th digit would instruct customers how to enter the 8th digit.

Customer Education:

Customer education would be relatively simple for the 8-digit overlay because very little changes when the plan goes into effect. The steps outlined below describe how to convert non-overlay regions to 8-digit overlays.

- Flyers would be sent with monthly phone bills, describing the new dialing pattern.
- Customers would be told that a new digit has been added to the end of their telephone number.
- Customers would be told to remember their numbers as:

(310) 1234567 - 0

- Customers will be told the "date" that permissive dialing of the new digit will begin.
- A sticker should be sent out with each telephone bill. The sticker should be applied to all telephones, and would say something like:

8-digit dialing begins 7/17/99

7 digit phone number + 0 = 310 area code

7 digit phone number + 1 = 424 area code

- On the "date", a courtesy delay (of 1 or 2 seconds) would give customers an opportunity to practice entering the new 8th digit. Since there would be only one area code to choose from during the permissive period, there would be no need to actually enter the digit. During the permissive period, all calls have to be intended for the original area code because that's the only one that exists.

Customers can enter 1234567-0 and avoid the short delay. If customers only enter 1234567, they will have to wait an extra 1 or 2 seconds.

- As each month of the permissive period passes, the courtesy delay could be increased slightly. As the delay got longer, customers would be more motivated to skip the delay by entering the extra "0". Phone company literature, newspaper articles and PSAs would also continue to educate customers, and encourage them to enter the 8th digit.
- Perhaps around the 4th month of the permissive period, an announcement after the 7th digit could instruct customers who were still not entering the "0". The announcement might say something like: *"To reach the 310 area code, you can avoid this delay by dialing "0" now."*
- At the end of the permissive period the new area code could be introduced. All telephone numbers from the new area code would always be distributed in the following form: (424) 1234567 - 1
- After the new area code is introduced, the announcement would be changed to something like:
"To reach the 310 area code, dial "0" now. To reach 424, dial "1" now."
- When more area codes are added, the message will be expanded. In actual practice, the message will seldom be heard since most customers will have already entered the new 8th digit before the announcement is triggered.
- Note: If the new digit is inadvertently entered after dialing a 10-digit or (1+10-digit) number, it is ignored, and has no effect on dialing (the same as if you entered an extra digit today).

The Cost of Customer Education:

The cost of customer education would not be any higher than the cost incurred with a standard overlay, however it would probably be more effective. Since the 8-digit overlay actually helps customers complete their calls without having to redial, the education process will seem to be more successful.

Compatibility with Existing and Planned Overlays:

There is no reason why the 8-digit overlay cannot be implemented on top of existing overlays - in fact it is even easier to convert existing overlays. This system would even work well with the half implemented 310 overlay. The permissive period described above could be skipped. Eight-digit dialing could be seamlessly introduced in the following manner:

- Flyers would be sent with monthly phone bills, describing the new dialing pattern.
- Customers would be told that a new digit has been added to the end of their telephone number, and that 8-digit dialing would consist of dialing the 7-digit portion of their telephone number plus this new "8th" digit when making calls within their overlay region.

- Customers would be told to remember their numbers as:

(310) 1234567 - 0

- Customers will be told the "date" that 8-digit dialing will be available.
- A sticker should be sent out with each telephone bill. The sticker should be applied to all telephones, and would say something like:

8-digit dialing begins 7/17/99

7 digit phone number + 0 = 310 area code

7 digit phone number + 1 = 424 area code

- On the "date", customers could begin dialing with 8-digits if they wanted to. If for some reason they only dialed 7-digits, after a few seconds an announcement would provide the following instructions:

"To reach the 310 area code, dial "0" now. To reach 424, dial "1" now."

- Customers don't have to ever use the 8-digit method if they don't want to. They can continue to dial with 1+10-digits if they prefer. Both types of dialing would be supported.
- When more area codes are added, the message will be expanded. In actual practice, the message will seldom be heard since most customers will have already entered the new 8th digit before the announcement is triggered.

- Note: If the new digit is inadvertently entered after dialing a 10-digit or (1+10-digit) number, it is ignored, and has no effect on dialing (the same as if you entered an extra digit today).
- Note: The 7-digit default would probably not be enabled in cases where 8-digit dialing is implemented on top of an existing overlay, since all 7-digit systems would have already been abandoned.

A Thorough Explanation As To Whether 8-Digit Dialing Is Compatible With Local Number Portability:

Explanation:

Numbers dialed through SMART are always converted to standard NANP numbers before they enter the network, and thus will behave like any other traditionally dialed number. The 8-dialed digits are converted to standard 10-digit (or 1+10-digit) telephone numbers. The network and the local number portability database will interact with the number as if 10-digits (or 1+10-digits) had been originally dialed. Therefore this 8-digit dialing system is compatible with local number portability.

A Thorough Explanation As To Whether 8-Digit Dialing Is Compatible With Number Conservation Measures, Such As Number Pooling And Rate Center Consolidation:

Explanation:

For the same reasons that this 8-digit dialing system is compatible with local number portability, it is also compatible with all of the stated number conservation measures.

Whether 8-digit dialing can be used in conjunction with hexa-decimal dialing described earlier in this ruling:

Explanation:

For the same reasons that this 8-digit dialing system is compatible with local number portability, it is also compatible with Bill Neill's hexa-decimal dialing proposal. If

Mr. Neill's system can be implemented, the 8-digit overlay will not affect it, nor will his proposal affect the 8-digit overlay.

A Description Of The Two Telecommunications Industry Reviews Of 8-Digit Dialing. Yablon Shall Append To His Comments A Copy Of Any Formal Reports And / Or Findings That Resulted From These Reviews. Yablon May Also Provide Information That Demonstrates Why The Concerns Raised In The Industry Reviews Are Unwarranted:

The California Telecommunications Industry's Review:

In May of 1997, I presented The Unified Dialing Plan for Overlays at the Camarillo public hearing for the 805 area code. Ms. Eleanor Szeto presided over the meeting for the CPUC, and Mr. Doug Hescox was the representative from the California-Nevada Code Administration. In response to my presentation, the California Telecommunications Industry met a few months later to evaluate the proposal. The review and its conclusions were disappointing. The industry's comments demonstrated that they had many misunderstandings about the plan, but the review was conducted as if they understood it fully. I was not invited to participate in the review, nor was I contacted to answer any questions or to provide any clarifications. The findings of the review were sent to me and to the CPUC. I later spoke with Ms. Szeto and Mr. Hescox at a hearing for the 310 area code in November of 1997, and relayed to them my concerns about the misunderstandings in the review. I asked how I could respond to the review and, Ms. Szeto indicated that I could send my comments to Mr. Hescox and to herself. ATTACHMENT 4 is a copy of the industry's review and my response to each of the industry's comments.¹⁴ I sent the response document to Ms. Szeto and Mr. Hescox on December 3, 1997.

¹⁴ Attachment 4 is a word-for-word reproduction of the industry's review, combined with my responses. I have also attached the cover letters that I sent with the document to Ms. Szeto and Mr. Hescox. A copy of the industry's original document is also available.

The comments and responses in ATTACHMENT 4 establish that the industry's concerns in this review are largely based on misunderstandings, and should not be taken as gospel.

The Industry Numbering Committee's Review:

In July of 1998 I presented The Unified Dialing Plan for Overlays to the Industry Numbering Committee (INC), with the expectation that "numbering experts" would be able to fully understand the plan, and how it would minimize the disruptive effects of area code relief. The INC accepted my proposal as an official issue (INC Issue#141), and worked it during three consecutive conferences in San Diego California, Edmonton Canada, and San Antonio Texas. I traveled extensively to participate in these conferences, to ensure that there would be no misunderstandings. The INC did take the time to fully understand the proposal, but as a united political unit, the INC made it clear that they were not interested in supporting it. In matters of area code relief, the industry supports the credo that "the customer will adapt". Minimizing hardship for the customer is not a priority for the Telcos, especially these days when the disruption is being fueled by fierce competition in the telecommunications industry.

It's no secret that the telecommunications industry is in love with the idea of "uniform 10-digit dialing" for everybody, regardless of customer resistance to the idea.¹⁵ Overlays are being used by the industry to help move the country into uniform 10-digit dialing, and a consumer friendly plan that would create an 8-digit overlay for customers interferes with the industry's vision. Uniform 10-digit dialing would certainly be simpler for the telephone companies, but what about the needs and wishes of the customer?

ATTACHMENT 5 is the full text of INC Issue 141. I have duplicated the findings below, and I will address each of the INC's concerns in the paragraphs that follow.

5. RESOLUTION

The INC identified and discussed the following technical and public policy concerns about Non-Disruptive Alternatives for Area Code Relief Using Overlays:

- Competitive Dialing Issues

¹⁵The INC has written a document entitled the "Uniform Dialing Plan", which outlines the industry's plan to institute mandatory 10-digit dialing for all calls - everywhere in the NANP.

- Different Network and Operations Support Systems vs. Current 10 Digit Overlay Implementation Requirements
- Network Timing Issues (i.e., Post Dialing Delay and Announcement Duration)
- Telephone Directories and Listing Services
- End User Concerns
- CPE Impacts
- Concerns About Implementation Costs
- Ubiquitous Deployment Issues (e.g., National Carriers)

Consequently, the INC decided against further work on this issue as it currently exists.

Competitive Dialing Issues

The 8-digit overlay does not present any competitive dialing issues that are not already generated by standard 10-digit overlays. The CLECs are mainly concerned that an 8-digit option will make overlays more appealing to the public. If overlays become popular, the CLECs are concerned that they will get stuck with number inventories from the new area code, and that they will have a hard time selling them.

It's the same argument that has been going on between ILECs and CLECs since overlays were first considered as a relief option. Meanwhile, customers continue to be the casualties in this war.

Different Network and Operations Support Systems vs. Current 10 Digit Overlay Implementation Requirements

Naturally the 8-digit overlay will require some new systems and possibly some new hardware that is not part of the current 10-digit overlay requirement. However, using this as a reason to reject 8-digit dialing is like a landlord saying "to give tenants enough hot water would require installing a different water heater, so you will just have to take cold showers instead". Not many landlords could get away with that, especially if they were the ones responsible for using up all the hot water in the first place.

New systems will have to be implemented to translate the 8-dialed digits into 10-digit numbers, however the task is not monumental, and the costs could be justified. The INC did nothing to investigate the scope of the changes that would actually be required, and that was the disappointing part of their evaluation.

Network Timing Issues (i.e., Post Dialing Delay and Announcement Duration)

Again, the INC did not conduct a study of what the actual impact of these two factors would be. With current methods of area code relief there are also delays and wasted network time. With both area code splits and standard overlays there are numerous misdials while people are learning the new dialing pattern, and with a 10-digit overlay every call will always take 42% to 57% longer to dial because of the extra digits that are required.

It is clear that this item requires further study to determine whether or not these delays are actually significant. Analysis should also consider that the permissive dialing period would require minimal delays and no announcement. And, as people get familiar with the plan there will be fewer and fewer instances where timing or the announcement actually get invoked.

Telephone Directories and Listing Services

The INC had a concern about how telephone numbers would be listed in directories and how 411 would verbalize telephone numbers. No one made any suggestions about what the format might potentially be, or what problems might occur due to these listings, however it was stated as a concern, so I will address it.

One solution for directories might be to put a legend at the top of every page. The legend would be something like this:

legend: 7-digits + "0" = 310 area code	7-digits + "1" = 424 area code
--	--------------------------------

999-1234-0
956-5555-1
347-9426-1
883-5342-0
213 594-8882
818 962-5321
654-8920-1
678-9572-0

Is it clear what area code each of these numbers is in?

The 411 operator could verbalize the following:

The number is 310-942-5333, overlay 0.
or The number is 424-583-1234, overlay 1.

Focus groups could determine if other language might be better, however it doesn't really seem that complicated.

End User Concerns

Earlier in this document there is a discussion about Customer Confusion and Customer Education. That discussion could be repeated here, but basically, it is very likely that customer confusion in an 8-digit overlay might actually be less of a problem than it is with area code splits and standard overlays.

CPE Impacts

This was also discussed earlier. Most CPE would not be affected at all, and might not even need reprogramming. However some PBX software may need to be updated.

Concerns About Implementation Costs

The response to this concern has also been covered earlier. The industry will have to do a detailed cost analysis that compares all area code relief options in order to determine whether or not costs are a significant issue for the 8-digit overlay.

Ubiquitous Deployment Issues (e.g., National Carriers)

One of the major advantages of this plan is that implementation costs are confined to the local area where the plan is actually implemented. Usually the reason the telecommunications industry gives for not implementing requested changes is that the change would impact all switching equipment in the NANP, which would be too costly. With the 8-digit overlay, the industry is complaining that the modifications would be localized, and would not pertain to all of their equipment. This cannot be ethically argued both ways. The fact that the Telcos are buying up the competition nation wide and are becoming de-facto monopolies once again should not be used to persuade regulators why customers in a local region should not be given better service.

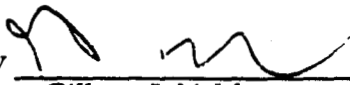
Conclusion:

The INC's review, though technically more astute than the California Telecommunications Industry Review, is clearly a political statement. None of the Telcos want to implement this plan because it doesn't serve the Telcos. How many customers will they gain if they implement this plan? The answer is none, we are already a captive audience. How many customers will they loose if they don't implement this plan? Again the answer is none, we will always be a captive audience.

On July 8th, a town hall meeting was held in Santa Monica -- the center of the 310 area code overlay. The meeting was attended by two CPUC Commissioners, several of the Commission's staff, State Assembly member Sheila Kuehl, and about 400 consumers who are very unhappy about 11-digit dialing. An astute statement was made by one of the panel members, and it went something like this "it is interesting that all of the companies are competing with each other to get the chance to offer customers every kind of new service imaginable - except the one they want!"

The 8-digit overlay can help give customers what they want - area code relief with minimal disruption and hardship. And the 8-digit overlay can help give the telecommunications industry what they want - area code relief without resistance from the public. If the industry will look for things that are "right" about this proposal, and work together to modify what "might be wrong", everyone will benefit.

Respectfully submitted,

By 

Gilbert J. Yablon

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Rd.
Woodland Hills, CA 91364
Telephone: (818) 999-1070
Facsimile: (818) 956-3298
E-mail: unified1@pacbell.net

July 23, 1999

ATTACHMENTS

ATTACHMENT 1

TECHNICAL FEASIBILITY STATEMENT REGARDING THE 8-DIGIT OVERLAY PROPOSAL

The following page makes up ATTACHMENT 1

July 11, 1999

Re: Technical feasibility of the 8-Digit Dialing Plan proposed by Gilbert J. Yablon

To Whom It May Concern:

In July of 1997 I retired as the Executive Director - Operations and Engineering for the United States Telephone Association (USTA) after 36 plus years of experience encompassing diverse disciplines in the telecommunications industry.

As the Executive Director of the Technical Disciplines Department, I managed a large portion of the technical committee activities at USTA associated with numbering issues. As part of my responsibilities, I was required to regularly attend and participate in most of the industry meetings concerning numbering matters. I served as Chair or Co-Chair on a number of these various committees and working groups including the Industry Numbering Committee (INC).

I have thoroughly reviewed Gilbert J. Yablon's 8-Digit Dialing Plan and have found it to be a technically feasible plan that should be considered when addressing area code relief. The plan does conform to the NANP in that each customer retains a seven digit address (ten digit including area code) and the eighth digit is used for dialing purposes only to identify the specific NPA.

As with any plan to provide relief, there will be costs associated with the plan. The cost and the extent of equipment modifications that will be incurred by the industry for each of the alternatives considered can only be addressed by the industry. The same is true for the cost to be incurred by the consumer. A cross-section of consumer groups needs to compile this data. And no matter what plan is implemented there will be customer confusion and education.

Providing area code relief is expensive and disruptive to both the industry and the consumer, therefore, all methods available that would ease this burden should be considered in enough detail to minimize the impacts.

Sincerely,

A handwritten signature in cursive script that reads "Dennis J. Byrne". The signature is written in dark ink and is positioned above the printed name and address.

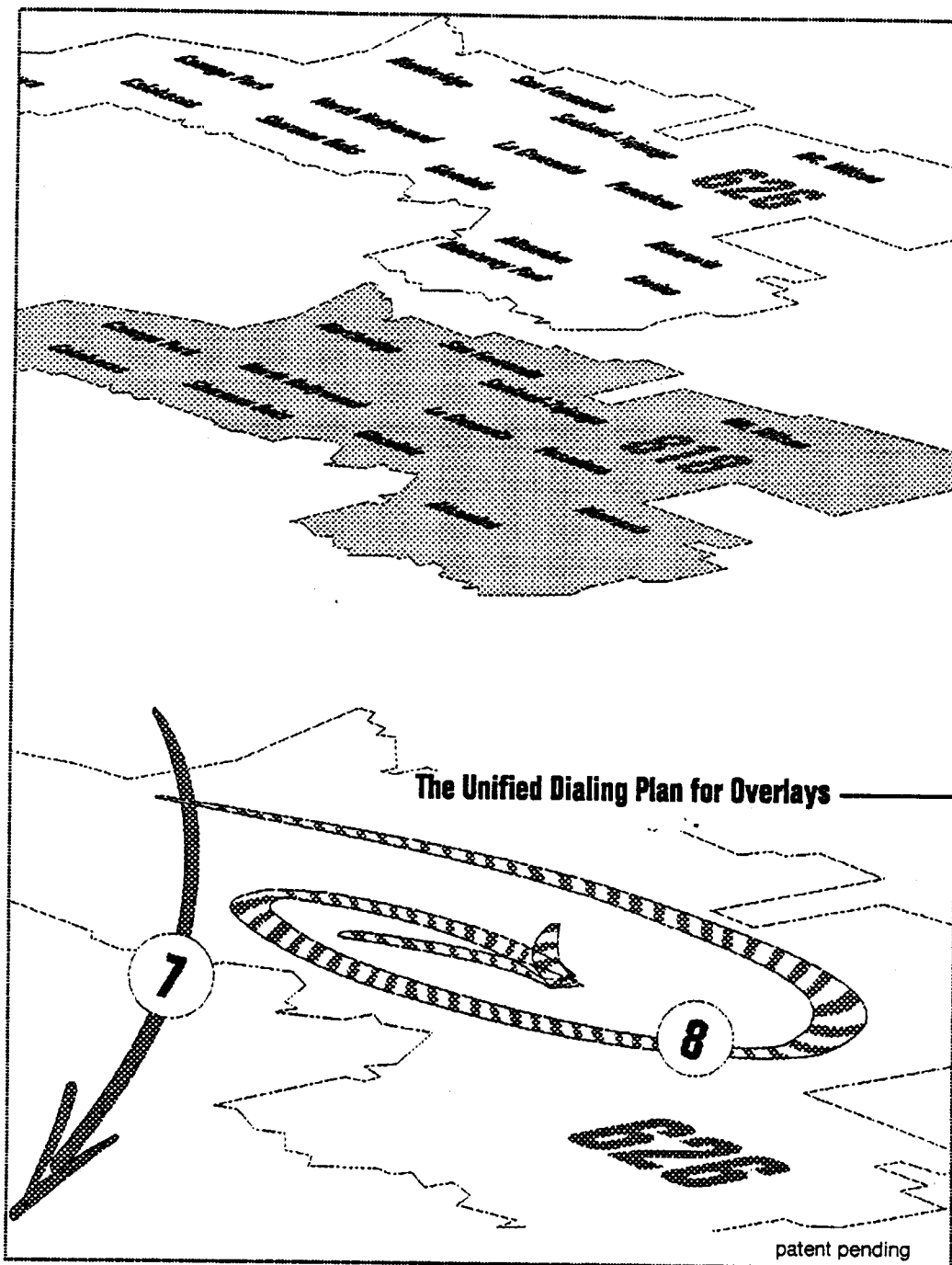
Dennis J. Byrne
1925 Rollingwood Drive
Fairfield, CA 94533
707-435-8285

ATTACHMENT 2A

UNIFIED DIALING PLAN FOR OVERLAYS DESCRIPTION

The following pages makes up ATTACHMENT 2A

Note: This document was originally created in 1997, and therefore some of its reference may be some what dated. In particular, it describes 818 and 626 as area codes that might be used to implement this 8-digit overlay system. These references are only to be used as hypothetical examples, and no argument is being made to implement the overlay with those two area codes.



Revised 11/15/98

Proposal

Contact:

Gilbert Yablon
The Unified Dialing Plan for Overlays
21914 Dumetz Rd.
Woodland Hills, CA 91364

818-999-1070-0 - (voice)
818-956-2200-0 - (alt. voice)
818-956-3298-0 - (fax)
UNIFIEDdpo@aol.com - email

"The Unified Dialing Plan for Overlays"

A Simplified 8 Digit Dialing System For Use With Overlaid Area Codes
proposed by Gilbert Yablon
revised 11/15/98

Introduction:

The Unified Dialing Plan for Overlays (UDPFO) offers a set of enhancements for standard overlay implementations. These enhancements simplify the public's transition to overlays by preserving the look and feel of non-overlay dialing within the affected area.

The main features of the UDPFO are:

- 1) An 8 digit dialing method can be used for all phone calls within the overlay region, allowing customers to dial just 7 digits + "1 additional digit" for indicating the intended area code.
- 2) A "safety net" is provided to catch any calls that might continue to be dialed with the old 7 digit method. This backward compatible feature facilitates transition to the new 8 digit plan. In emergencies this feature may also help avoid disasters since it could continue to allow unattended auto dialing systems - including fire and burglar alarms - to complete calls even if they have not been reprogrammed.
- 3) 10 digit and 1+10 digit dialing is available for all calls, but with the UDPFO it is not mandatory to dial this way.
- 4) The special 8 digit dialing method and the 7 digit safety net are optional features. They are available for those customers who wish to take advantage of these consumer friendly dialing alternatives. If customers prefer to dial 10 digits or 1+10 digits for every call (as is required in standard overlays), they can easily bypass the enhanced features of the UDPFO.

How it works:

The UDPFO can be thought of as an intelligent system that sits on top of (or is part of) a standard telephone company switch. It does not in any manner alter the way in which phone numbers are handled by the telephone network. It merely provides an alternate method of accessing the industry standard 3 digit area code + 7 digit phone number system. Within traditional Numbering Plan Areas (NPAs), the area code is implied, and calls can be completed by dialing just 7 digits. In overlay regions, where multiple area codes exist within a single geographic area, the UDPFO allows the intended area code to be indicated with a single digit - instead of 3 digits. By dialing 7 digits in the traditional manner and then dialing only one additional digit (the new "8th" digit), the user can indicate which of the area codes in the region that the call is intended for. The 8 digit number is then translated into an industry standard 10 digit number before any switching occurs. The network and all switches will process this number as if it had been originally dialed as 10 digits or 1+10 digits.

This simple plan for overlays could also be called the "SMART" Dialing System.

"Smart" is an acronym for:

Simplified
Multi
Area Code
Region
Telephone Dialing System

The "SMART" system offers the following advantages over standard overlays:

- It greatly reduces the confusion and inconvenience that is associated with having multiple area codes within individual neighborhoods and households.
- It provides a simplified dialing system which allows customers throughout the overlay region to dial just 8 digits instead of 10 digits or 1+10 digits for all calls within the region.
- It minimizes the hardship normally associated with an area code change, especially for children, handicapped persons and the elderly.
- It ensures that unattended auto dialers (like fire alarms and burglar alarms) will be able to complete calls even without reprogramming.
- It reduces the likelihood that the new overlay area code will be a stigma for new businesses.
- It reduces the public's resistance to accepting overlays for area code relief.

Defining these terms will be helpful for the discussions that follow:

<i>original area code</i>	The area code that existed in the region before any other area codes were overlaid on top of it. In these examples the 818 area code is the <i>original area code</i> or <i>level</i> of the overlay.
<i>new area code</i>	A new overlaid area code. In these examples the 626 area code is the first <i>new area code</i> or <i>level</i> of the overlay.
<i>home overlay region</i>	A single geographic region which contains the original area code and all of the new overlaid area codes.
<i>home overlay region calls</i>	Refers to calls where the originating and the destination area codes both reside within the same geographic region.
<i>abbreviated dialing</i>	Dialing which requires fewer than 10 digits to complete. Today, abbreviated dialing within a single area code typically requires dialing just 7 digits. In a Unified Dialing Plan for Overlays scenario, where multiple area codes occupy the same geographic region, abbreviated dialing is accomplished by dialing just 7 digits + "1 additional digit" for indicating the area code.

In Brief:

This plan proposes a system in which dialing within a "home overlay region" is facilitated by:

- An "8 digit" dialing method which can be used for all "home overlay region calls." Customers will dial 7 digits + "1 additional digit." The "1 additional digit" indicates the intended area code.
- A permissive "7 digit + timing" default mechanism which facilitates the changeover from 7 digit dialing to the new 8 digit dialing system. After the transition period is complete, this feature can continue to provide an emergency "safety net" which will ensure that unattended auto dialers (like fire alarms and burglar alarms) will be able to complete calls without reprogramming. And...
- "10 digit" (or "1+10 digit") dialing which is always available for all calls. Industry standard 10 digit phone numbers are the backbone of this dialing plan, and 10 digit dialing should be made available for customers who prefer to dial this way. The "8 digit" dialing option is merely an alternative (or short cut) method for accessing these same industry standard 10 digit numbers.

Refer to Fig. 4A at the end of this report for an illustration of how these three dialing methods are integrated in the Unified Dialing Plan for Overlays.

This plan is applicable to any area where an overlay might need to be implemented. The following hypothetical illustrations describe 818 as the original area code, and 626 as the first new "overlaid" level.

How the plan would be implemented:

Each area code within a "home overlay region" will be assigned a one digit identifier which can then be used as the 8th digit (or suffix) when dialing.

In our hypothetical 818/626 home overlay region, the suffixes would be assigned as follows:

- All 818 numbers would receive a suffix of "0" (representing the original level).
- All 626 numbers would receive a suffix of "1" (representing the first new level).
- Any future overlay levels would receive a suffix of "2" - "9" in that order. This framework will allow for easy future expansion when more numbers are needed.

For example:

123-4567-0 = 1-818-123-4567 Within the 818/626 overlay region, either style is valid.

123-4567-1 = 1-626-123-4567 Within the 818/626 overlay region, either style is valid.

123-4567-2 = 1-???-123-4567 Within the 818/626/??? overlay region, either style will be valid (for a third overlaid area code).

Further:

- A "safety net" is provided which facilitates transition to this new 8 digit plan. After 7 digits are dialed a timing interval begins. If an 8th digit is not entered before the interval elapses the call will default to the "original" area code of the overlay grouping. This feature provides backward compatibility with existing dialing patterns during transition, and ensures that old style 7 digit calls will complete in emergency situations.

For example:

123-4567+timing delay = 1-818-123-4567 Defaults to 818 + 7 digit number to accommodate existing dialing patterns. The industry would determine the appropriate length for this timing delay.

From anywhere within the overlay area, the dialing plan would operate as follows:

- Once 7 digits are received, the phone system will wait an additional timing period (to be determined by the industry) for a possible 8th digit which technically is the "overlay area code selector."
- If 8 digits are received, phone system equipment will run an analysis on the number, examining the 8th digit to determine the intended area code.
- If the 8th digit is a "0", the call will be directed to the 818 level of the overlay.
- If the 8th digit is a "1", the call will be directed to the 626 level of the overlay.
- If the industry determined "timing delay" elapses before the 8th digit is received, a suffix of "0" is assumed, and the 7 digit call will automatically be directed to the 818 level of the overlay. This "default" mechanism will facilitate a smooth transition from 7 digit dialing to the new 8 digit plan.
- If an industry determined "timing delay" elapses and less than 7 digits have been received, the call is considered abandoned, and the standard "try again" message is given.
- Once the proper overlay level is determined and the call is routed to the proper area code within the overlay region, the suffix is discarded, leaving a standard 7 digit number to be routed by traditional 7 digit switching systems.
- To summarize, all "7 digit + suffix" or "7 digit + timing" calls are converted to 10 digit or 1+10 digit numbers by the phone system, and are then transparently routed to the proper overlay level.

Note: 10 digit or 1 + 10 digit dialing for home overlay region calls would also be supported, if that were how people preferred to dial, but it would not be mandatory.

Handling local or toll calls going outside the 818/626 overlay region:

Mandatory 10 digit dialing or 1 + 10 digit dialing would be used for dialing to any number outside of the 818/626 overlay region. If someone in the overlay region were to accidentally use the "10 + x" or "1 + 10 + x" format (because they had become accustomed to dialing 8 digit phone numbers) it wouldn't matter because in 10 digit and 1 + 10 digit dialing the network ignores all extra digits beyond 10 or 1+10.

Handling local or toll calls coming into the 818/626 overlay region:

When calling from outside of the 818/626 region, standard 10 digit or 1 + 10 digit dialing would be used to dial to any number inside of the 818/626 region. If someone from outside the 818/626 region were to accidentally use the "10 + x" or "1 + 10 + x" format (because they were unclear as to the correct dialing rules) it wouldn't matter because the network will ignore any extra digits beyond 10 or 1+10.

Directory listings:

In the 818/626 telephone directories the numbers will be listed as follows:

legend:		7 digits + "0" = 818 area code	7 digits + "1" = 626 area code
818 number	999-3360-0		
626 number	956-2200-1		
213 number	213-462-2110		out of "overlay area" number
626 number	347-9426-1		
818 number	883-6234-0		
818 number	830-9339-0		
818 number	982-7417-0		
626 number	889-4509-1		
310 number	310-244-0177		out of "overlay area" number

(Directory listings continue)

Because no area codes would need to be listed for "home overlay region" phone numbers, the "new" 626 numbers (which a new business might have) will not stand out as red flags to customers looking for experienced services. Naturally, phone numbers with area codes outside of the "home overlay region" would stand out, as is already the case in current directories.

To further remind people how the system works, a sticker could be supplied to customers in the 818/626 region. For example:

8 digit dialing supported:

7 digit phone number + 0 = 818 area code

7 digit phone number + 1 = 626 area code

How to inform the public on how to use the new plan:

On and after the date that this plan is to take effect:

Calls made from any telephone within the 818/626 overlay region can be dialed as follows:

- **For calls to 818 numbers:**
Dial the 7 digit number like you always have, and then enter a "0."
- **For calls to 626 numbers:**
Dial 7 digits, and then enter a "1."
- **For calls to phone numbers in area codes outside of the 818/626 overlay region:**
Dial 1 + area code + 7 digits -- the same as you would before the overlay went into effect.
- **Note, if only 7 digits are dialed:**
If you do not enter an 8th digit, after a significant delay your call will default to the dialed 7 digit number in the 818 area code.
You should always dial the appropriate 8th digit in order to avoid this delay.

For calls made from area codes outside of the 818/626 overlay region:

- **to any area code within the 818/626 overlay region:**
Dial 1 + area code + 7 digits -- the same as you would before the overlay went into effect.

Conclusion:

This plan addresses customers' objections to using overlays which they fear would result in confusion and/or the inconvenience of having to dial 10 digits or 1+11 digits just to call across the street.

The plan allows for abbreviated "7 digit + suffix" dialing from and to any phone within the entire overlay region, without affecting how 10 digit or 1 + 10 digit calls "out-of", "into", or within the overlay region are handled. It is expandable to 10 levels (0-9) of overlay within a single geographic dialing region, allowing for painless addition of many new numbers in the future.

A "safety net" is provided to facilitate transition from 7 digit dialing to the new 8 digit dialing method, which will also minimize the need to reprogram unattended automatic dialing devices (like burglar alarms and fire alarms), and will minimize lost calls in emergency situations.

Additionally, the new style of directory listings won't be a disadvantage for new businesses.

(Conclusion continued)

For the public, this plan will have the psychological appeal of being a new "high tech" solution to the challenges presented by splits and standard overlays. It addresses all of the public's concerns about overlays, and will leave citizens and businesses with a feeling that something is finally being done to protect them from the hardship and inconvenience that traditionally comes with area code exhaust and relief.

When the advantages of this plan are weighed against the disadvantages of area code splits and standard implementations of overlays (expense, disruption, confusion, inconvenience, permanent impact on the size of geographic dialing areas, etc.), this unified dialing plan for overlays clearly makes sense as a solution for both the short and the long term.

This system can be applied to any area that is faced with the need to introduce an overlay. If this system becomes a standard, over time large areas of North America would be able to locally take advantage of this plan without affecting how any "out of region" or "into region" dialing and switching is handled.

Illustrations:

Using the 818/626 area codes as an example, the attached diagrams illustrate how dialing patterns are impacted by various forms of area code relief.

- *Figure 1A* shows the established dialing patterns in an area code prior to implementing relief.
- *Figure 2A* shows how an area code split disrupts established dialing patterns.
- *Figure 3A* shows how a standard overlay impacts established dialing patterns and how its overlay levels are not united by a distinctive dialing plan.
- *Figure 4A* shows how The Unified Dialing Plan for Overlays unifies all levels of the overlay region with a simple 8 digit dialing system, and how it provides a "safety net" which facilitates transition from 7 digit dialing to the new 8 digit dialing method and minimizes lost calls in emergency situations.

Submitted by:

Gilbert Yablon
The Unified Dialing Plan for Overlays
21914 Dumetz Rd.
Woodland Hills, CA 91364

818-999-1070-0 - (voice)
818-956-2200-0 - (alt. voice)
818-956-3298-0 - (fax)

UNIFIEDdpo@aol.com - email

Currently Existing Area Code

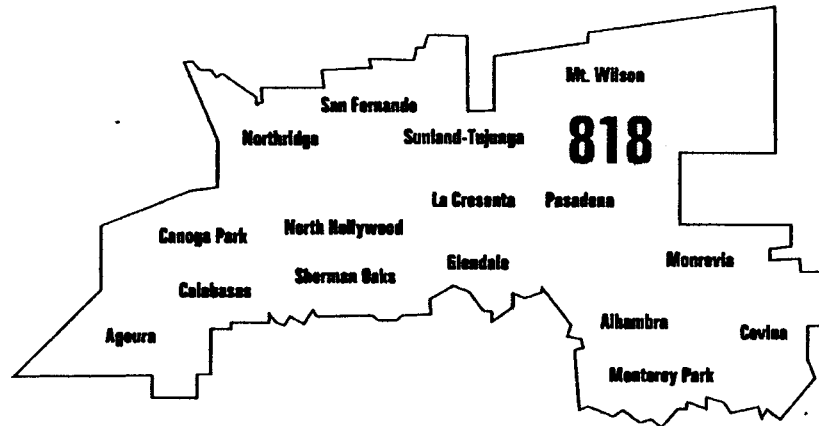


Fig.1: Communities Involved

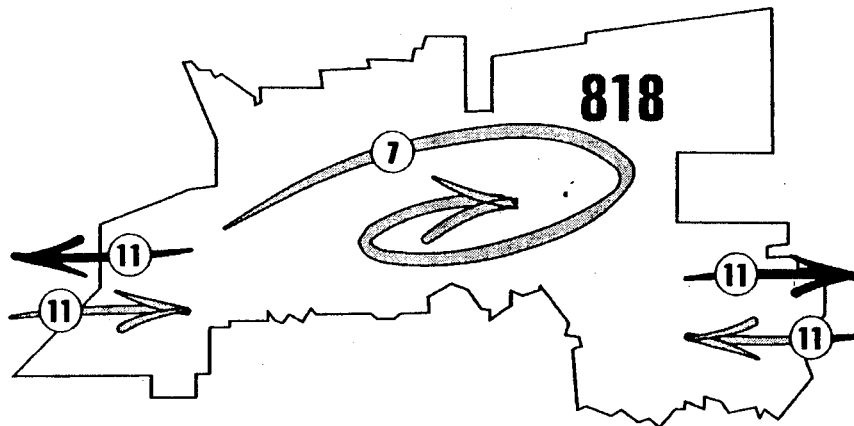


Fig.1A: Dialing Patterns

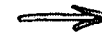
Dialing Options

**7 Digit Dialing
Within 818**
123-4567



**11 Digit Dialing
Into Area**

1+818+123-4567



Out of Area

1+NXX+123-4567



This map shows the established dialing patterns of an area code before being impacted by area code relief. These dialing patterns will be disrupted by either a split or a standard overlay.

Approved Area Code Split [effective June 1997]

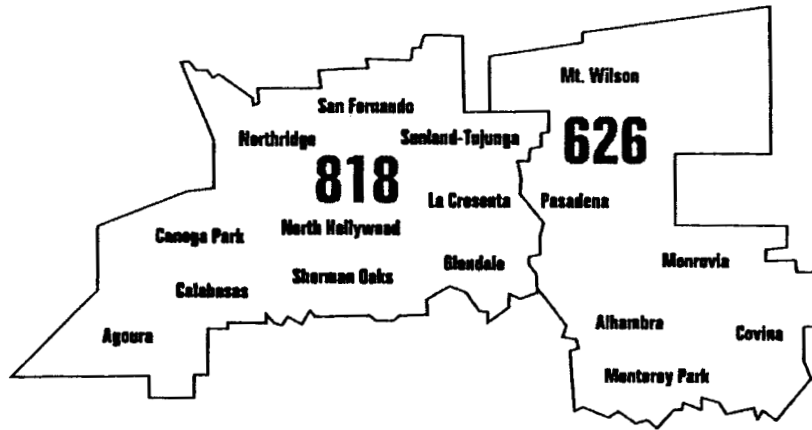


Fig.2: Communities Involved

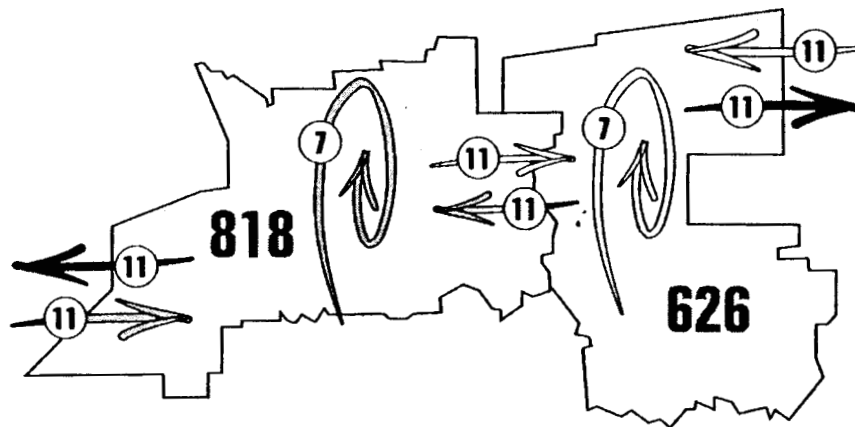


Fig.2A: Dialing Patterns

Dialing Options

**7 Digit Dialing
Within 818
123-4567**

or

**Within 626
123-4567**

**11 Digit Dialing
Into Area**

1+818+123-4567

1+626+123-4567

Out of Area

1+NXX+123-4567

Between 818/626

1+818+123-4567

1+626+123-4567

Implementing a split greatly impacts dialing for calls both within and into the original NPA. This method of relief is expensive for business and disruptive to all customers, both within and outside of the affected area.

The Standard Overlay Method

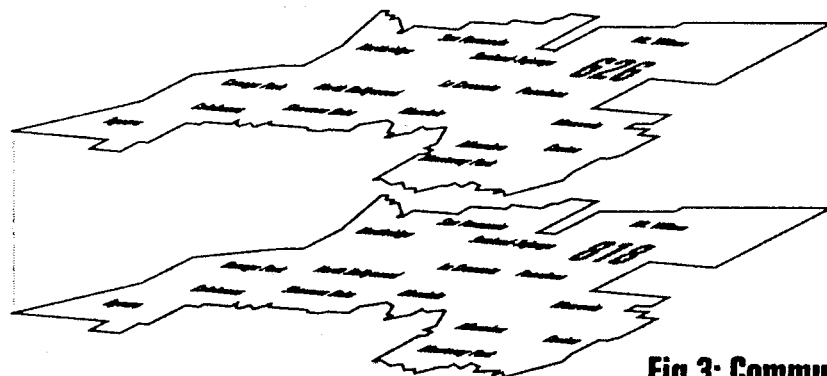


Fig.3: Communities Involved

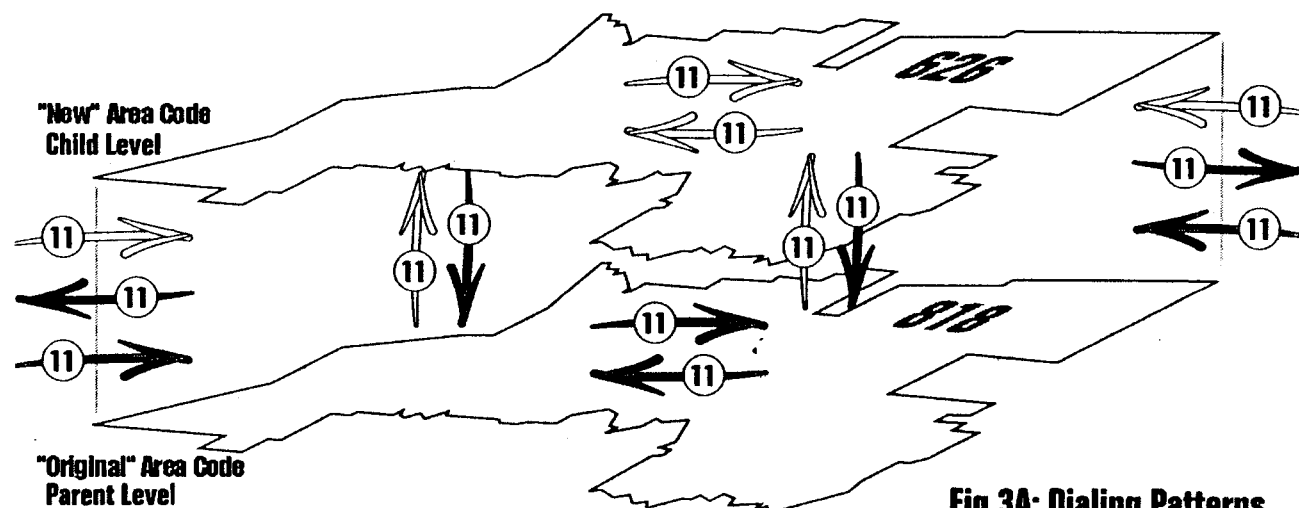


Fig.3A: Dialing Patterns

Dialing Options

7 Digit Dialing

Thought to be impractical for
this Overlay Method

Mandatory 11 Digit Dialing

Into Area

→ 1+818+123-4567
→ or 1+626+123-4567

Out of Area

→ 1+NXX+123-4567

Within 818/626 Area

→ 1+818+123-4567
→ or 1+626+123-4567

With abbreviated dialing abandoned, the overlay levels are not unified by a distinctive dialing plan. The concern that this mix of area codes will cause hardship and confusion for citizens has prevented overlays from becoming widely accepted.

The Unified Dialing Plan for Overlays

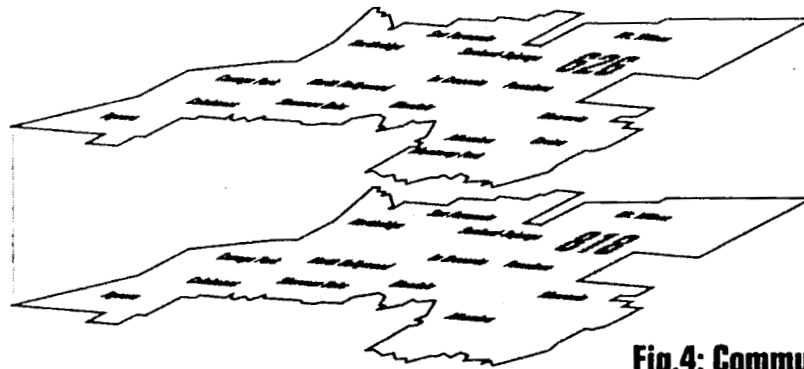


Fig.4: Communities Involved

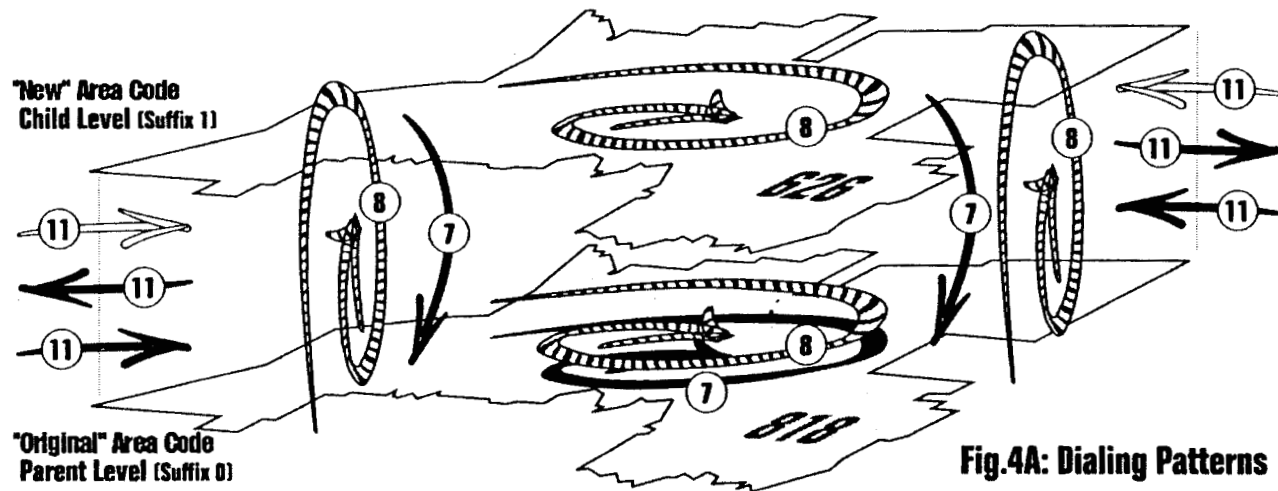


Fig.4A: Dialing Patterns

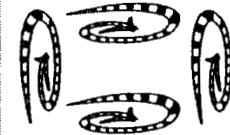
Dialing Options

Unified - 8 Digit Dialing (7+X)

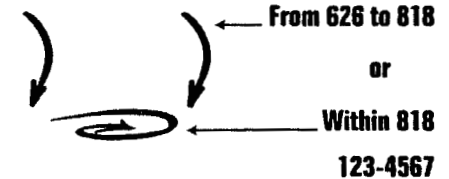
Within 818/626 Area

123-4567+0 (for 818)

123-4567+1 (for 626)



Transitional 7 Digit + Timing - Safety Net



1+10 = 11 Digit Dialing

Into Area

1+818+123-4567

or 1+626+123-4567



Out of Area

1+NXX+123-4567



Note: For Optional 11 Digit Dialing

Within 818/626 Area

Refer to Fig. 3A

This overlay method provides for long term relief AND maintains the integrity of the original dialing area by:

- 1) Unifying all levels of the overlay with a simple 8 digit (7+suffix) dialing system.
- 2) Creating a backward compatible 'Safety Net' which facilitates transition and prevents old style 7 digit calls from being lost.
- 3) Allowing for optional (not mandatory) 1+10 digit dialing between levels of the overlay.

ATTACHMENT 2B

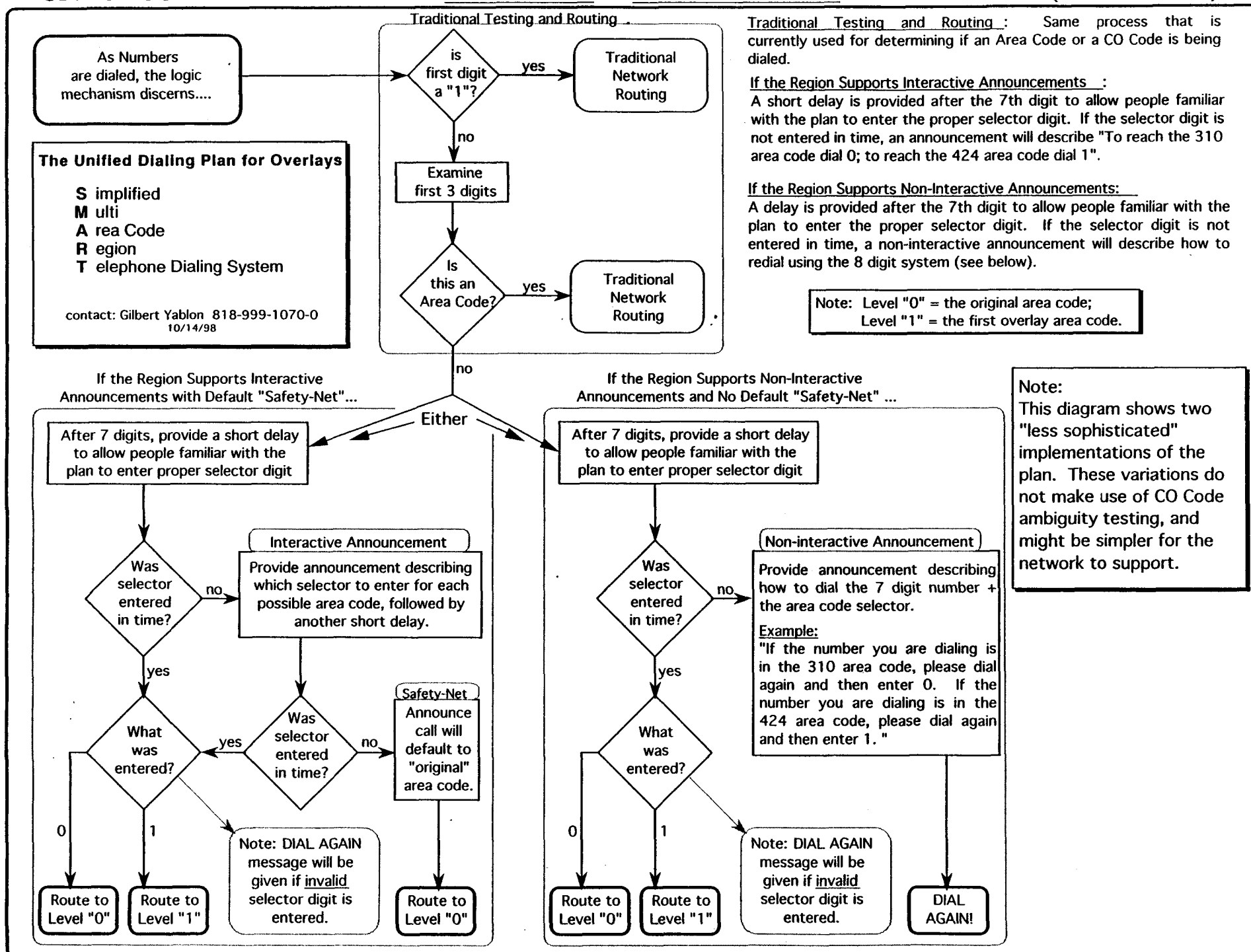
LOGIC FLOW DIAGRAM FOR TWO VARIATIONS OF THE PROPOSAL

The following page makes up ATTACHMENT 2B

Note: This diagram is only provided as a general guide to visually demonstrate how the system determines what is being dialed and how the dialed numbers are translated and routed. It is not a definitive description of the plan.

Two possible variations are shown as examples only.

UDPFO LOGIC FLOW DIAGRAM with INTERACTIVE or NON-INTERACTIVE ANNOUNCEMENT (versions C&D)



ATTACHMENT 3

THE TELECOMMUNICATIONS ACT OF 1996 SECTION 251

The following pages make up ATTACHMENT 3

paragraph defines more than one term; and

(B) the words 'The term';

(7) by changing the first letter of each defined term in such paragraphs from a capital to a lower case letter (except for 'United States', 'State', 'State commission', and 'Great Lakes Agreement'); and

(8) by reordering such paragraphs and the additional paragraphs added by subsection (a) in alphabetical order based on the headings of such paragraphs and renumbering such paragraphs as so reordered.

(d) CONFORMING AMENDMENTS- The Act is amended--

(1) in section 225(a)(1), by striking 'section 3(h)' and inserting 'section 3';

(2) in section 332(d), by striking 'section 3(n)' each place it appears and inserting 'section 3'; and

(3) in sections 621(d)(3), 636(d), and 637(a)(2), by striking 'section 3(v)' and inserting 'section 3'.

TITLE I--TELECOMMUNICATION SERVICES

SUBTITLE A--TELECOMMUNICATIONS SERVICES

SEC. 101. ESTABLISHMENT OF PART II OF TITLE II.

(a) AMENDMENT- Title II is amended by inserting after section 229 (47 U.S.C. 229) the following new part:

'PART II--DEVELOPMENT OF COMPETITIVE MARKETS

'SEC. 251. INTERCONNECTION.

'(a) GENERAL DUTY OF TELECOMMUNICATIONS CARRIERS- Each telecommunications carrier has the duty--

'(1) to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers; and

'(2) not to install network features, functions, or capabilities that do not comply with the guidelines and standards established pursuant to section 255 or 256.

'(b) OBLIGATIONS OF ALL LOCAL EXCHANGE CARRIERS- Each local exchange carrier has the following duties:

'(1) RESALE- The duty not to prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of its telecommunications services.

'(2) NUMBER PORTABILITY- The duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.

'(3) DIALING PARITY- The duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no

unreasonable dialing delays.

`(4) ACCESS TO RIGHTS-OF-WAY- The duty to afford access to the poles, ducts, conduits, and rights-of-way of such carrier to competing providers of telecommunications services on rates, terms, and conditions that are consistent with section 224.

`(5) RECIPROCAL COMPENSATION- The duty to establish reciprocal compensation arrangements for the transport and termination of telecommunications.

`(c) ADDITIONAL OBLIGATIONS OF INCUMBENT LOCAL EXCHANGE CARRIERS-

In addition to the duties contained in subsection (b), each incumbent local exchange carrier has the following duties:

`(1) DUTY TO NEGOTIATE- The duty to negotiate in good faith in accordance with section 252 the particular terms and conditions of agreements to fulfill the duties described in paragraphs (1) through (5) of subsection (b) and this subsection. The requesting telecommunications carrier also has the duty to negotiate in good faith the terms and conditions of such agreements.

`(2) INTERCONNECTION- The duty to provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network--

`(A) for the transmission and routing of telephone exchange service and exchange access;

`(B) at any technically feasible point within the carrier's network;

`(C) that is at least equal in quality to that provided by the local exchange carrier to itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection; and

`(D) on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252.

`(3) UNBUNDLED ACCESS- The duty to provide, to any requesting telecommunications carrier for the provision of a telecommunications service, nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory in accordance with the terms and conditions of the agreement and the requirements of this section and section 252. An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.

`(4) RESALE- The duty--

`(A) to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers; and

`(B) not to prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications service, except that a State commission may, consistent with regulations prescribed by the Commission under this section, prohibit a reseller that obtains at wholesale rates a telecommunications service that is available at retail only to a category of subscribers from offering such service to a different category of subscribers.

`(5) NOTICE OF CHANGES- The duty to provide reasonable public notice of changes in the information necessary for the transmission and routing of services using that local exchange carrier's facilities or networks, as well as of any other changes that would affect the interoperability of those facilities and networks.

`(6) COLLOCATION- The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State commission that physical collocation is not practical for technical reasons or because of space limitations.

`(d) IMPLEMENTATION-

`(1) IN GENERAL- Within 6 months after the date of enactment of the Telecommunications Act of 1996, the Commission shall complete all actions necessary to establish regulations to implement the requirements of this section.

`(2) ACCESS STANDARDS- In determining what network elements should be made available for purposes of subsection (c)(3), the Commission shall consider, at a minimum, whether--

`(A) access to such network elements as are proprietary in nature is necessary; and

`(B) the failure to provide access to such network elements would impair the ability of the telecommunications carrier seeking access to provide the services that it seeks to offer.

`(3) PRESERVATION OF STATE ACCESS REGULATIONS- In prescribing and enforcing regulations to implement the requirements of this

section, the Commission shall not preclude the enforcement of any regulation, order, or policy of a State commission that--

`(A) establishes access and interconnection obligations of local exchange carriers;

`(B) is consistent with the requirements of this section; and

`(C) does not substantially prevent implementation of the requirements of this section and the purposes of this part.

`(e) NUMBERING ADMINISTRATION-

`(1) COMMISSION AUTHORITY AND JURISDICTION- The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis. The Commission shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction.

`(2) COSTS- The cost of establishing telecommunications numbering administration arrangements and number portability shall be borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission.

`(f) EXEMPTIONS, SUSPENSIONS, AND MODIFICATIONS-

`(1) EXEMPTION FOR CERTAIN RURAL TELEPHONE COMPANIES-

`(A) EXEMPTION- Subsection (c) of this section shall not apply to a rural telephone company until (i) such company has received a bona fide request for interconnection, services, or network elements, and (ii) the State commission determines (under subparagraph (B)) that such request is not unduly economically burdensome, is technically feasible, and is consistent with section 254 (other than subsections (b)(7) and (c)(1)(D) thereof).

`(B) STATE TERMINATION OF EXEMPTION AND IMPLEMENTATION SCHEDULE- The party making a bona fide request of a rural telephone company for interconnection, services, or network elements shall submit a notice of its request to the State commission. The State commission shall conduct an inquiry for the purpose of determining whether to terminate the exemption under subparagraph (A). Within 120 days after the State commission receives notice of the request, the State commission shall terminate the exemption if the request is not unduly economically burdensome, is technically feasible, and is consistent with section 254 (other than subsections (b)(7) and (c)(1)(D) thereof). Upon termination of the exemption, a State commission shall establish an

implementation schedule for compliance with the request that is consistent in time and manner with Commission regulations.

`(C) LIMITATION ON EXEMPTION- The exemption provided by this paragraph shall not apply with respect to a request under subsection (c) from a cable operator providing video programming, and seeking to provide any telecommunications service, in the area in which the rural telephone company provides video programming. The limitation contained in this subparagraph shall not apply to a rural telephone company that is providing video programming on the date of enactment of the Telecommunications Act of 1996.

`(2) SUSPENSIONS AND MODIFICATIONS FOR RURAL CARRIERS- A local exchange carrier with fewer than 2 percent of the Nation's subscriber lines installed in the aggregate nationwide may petition a State commission for a suspension or modification of the application of a requirement or requirements of subsection (b) or (c) to telephone exchange service facilities specified in such petition. The State commission shall grant such petition to the extent that, and for such duration as, the State commission determines that such suspension or modification--

`(A) is necessary--

`(i) to avoid a significant adverse economic impact on users of telecommunications services generally;

`(ii) to avoid imposing a requirement that is unduly economically burdensome; or

`(iii) to avoid imposing a requirement that is technically infeasible; and

`(B) is consistent with the public interest, convenience, and necessity.

The State commission shall act upon any petition filed under this paragraph within 180 days after receiving such petition. Pending such action, the State commission may suspend enforcement of the requirement or requirements to which the petition applies with respect to the petitioning carrier or carriers.

`(g) CONTINUED ENFORCEMENT OF EXCHANGE ACCESS AND INTERCONNECTION

REQUIREMENTS- On and after the date of enactment of the Telecommunications Act of 1996, each local exchange carrier, to the extent that it provides wireline services, shall provide exchange access, information access, and exchange services for such access to interexchange carriers and information service providers in accordance with the same equal access and nondiscriminatory

interconnection restrictions and obligations (including receipt of compensation) that apply to such carrier on the date immediately preceding the date of enactment of the Telecommunications Act of 1996 under any court order, consent decree, or regulation, order, or policy of the Commission, until such restrictions and obligations are explicitly superseded by regulations prescribed by the Commission after such date of enactment. During the period beginning on such date of enactment and until such restrictions and obligations are so superseded, such restrictions and obligations shall be enforceable in the same manner as regulations of the Commission.

`(h) DEFINITION OF INCUMBENT LOCAL EXCHANGE CARRIER-

`(1) DEFINITION- For purposes of this section, the term 'incumbent local exchange carrier' means, with respect to an area, the local exchange carrier that--

`(A) on the date of enactment of the Telecommunications Act of 1996, provided telephone exchange service in such area; and

`(B)(i) on such date of enactment, was deemed to be a member of the exchange carrier association pursuant to section 69.601(b) of the Commission's regulations (47 C.F.R. 69.601(b)); or

`(ii) is a person or entity that, on or after such date of enactment, became a successor or assign of a member described in clause (i).

`(2) TREATMENT OF COMPARABLE CARRIERS AS INCUMBENTS- The Commission may, by rule, provide for the treatment of a local exchange carrier (or class or category thereof) as an incumbent local exchange carrier for purposes of this section if--

`(A) such carrier occupies a position in the market for telephone exchange service within an area that is comparable to the position occupied by a carrier described in paragraph (1);

`(B) such carrier has substantially replaced an incumbent local exchange carrier described in paragraph (1); and

`(C) such treatment is consistent with the public interest, convenience, and necessity and the purposes of this section.

`(i) SAVINGS PROVISION- Nothing in this section shall be construed to limit or otherwise affect the Commission's authority under section 201.

`SEC. 252. PROCEDURES FOR NEGOTIATION, ARBITRATION, AND APPROVAL

OF

AGREEMENTS.

`(a) AGREEMENTS ARRIVED AT THROUGH NEGOTIATION-

ATTACHMENT 4

CALIFORNIA TELECOMMUNICATIONS INDUSTRY REVIEW AND GILBERT YABLON'S RESPONSE

The following pages makes up ATTACHMENT 4

This attachment includes the Review / Response, and cover letters that were sent to Eleanor Szeto of the CPUC and Doug Hescox (formerly of the California / Nevada Code Administration).

12/3/97

Ms. Eleanor Yung Szeto
California Public Utilities Commission
Telecommunications Division
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. Szeto,

Thank you for taking the time to speak with me at the Culver City (310) area code relief hearing. As you suggested, I am submitting the attached document in response to the Telecommunications Industry's review of the Unified Dialing Plan for Overlays, so that the Commission can reconsider the merits of this plan in light of my response.

The industry's review offers me a great opportunity to clarify some misunderstandings, and to answer many questions about how the Unified Dialing Plan for Overlays (UDPFO) actually works, and the benefits it offers.

The attached document contains both the industry's comments about the UDPFO and my responses to those comments. I have included extra copies of this document so that you can easily distribute it to: Commissioners Conlon, Duque, Knight, Neeper and Bilas; and to other appropriate CPUC staff -- notably: yourself, Lorann King, Risa Hernandez and Karen Jones -- for evaluation.

The UDPFO offers an elegant, technically workable solution to a difficult, persistent problem. It presents a way to add new numbers to an exhausted area without disrupting any established dialing patterns to pre-relief phone numbers. Because it is "backwardly compatible" with established dialing patterns, implementing this plan will minimize the expense and hardship that local business and the public have traditionally endured every time relief has been necessary. Examination of the attached review/response will clarify why the UDPFO should be seriously considered by the Commission as an option for area code relief.

Thank you for taking this second look.

I will be happy to supply additional copies of this document as well as copies of the original Unified Dialing Plan for Overlays proposal, and any other materials or information you may require to assist in your evaluation.

Sincerely,

Gilbert Yablon
ATTACHMENTS

12/3/97

Mr. Doug Hescoc
Area Code Administrator
California - Nevada Code Administration
2600 Camino Ramon, Rm. 1S900
San Ramon, CA 94583

Dear Mr. Hescoc,

Thank you for taking the time to speak with me at the Culver City (310) area code relief hearing. As was suggested by Eleanor Szeto, I am submitting the attached document in response to the Telecommunications Industry's review of the Unified Dialing Plan for Overlays, so that the Industry can reconsider the merits of this plan in light of my response.

The industry's review offers me a great opportunity to clarify some misunderstandings, and to answer many questions about how the Unified Dialing Plan for Overlays (UDPFO) actually works, and the benefits it offers.

The attached document contains both the industry's comments about the UDPFO and my responses to those comments. Please present it to appropriate industry members for re-evaluation.

The UDPFO offers an elegant, technically workable solution to a difficult, persistent problem. It presents a way to add new numbers to an exhausted area without disrupting any established dialing patterns to pre-relief phone numbers. Because it is "backwardly compatible" with established dialing patterns, implementing this plan will minimize the expense and hardship that local business and the public have traditionally endured every time relief has been necessary. Examination of the attached review/response will clarify why the UDPFO should be seriously considered by the Telecommunications Industry as an option for area code relief.

Thank you for taking this second look.

I will be happy to supply additional copies of this document as well as copies of the original Unified Dialing Plan for Overlays proposal, and any other materials or information you may require to assist in your evaluation.

Sincerely,

Gilbert Yablon
ATTACHMENT

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

In this response, each paragraph of the Telecommunications Industry Review of the Unified Dialing Plan for Overlays (from 8/12/97) is reproduced word-for-word in italics. Mr. Yablon's response (in plain type face) follows each industry statement.

What the industry said in their review:

At the Camarillo public meeting Mr. Gilbert Yablon presented his "Unified Dialing Plan for Overlays," a plan intended to resolve the dialing disparity associated with overlays. Mr. Yablon described his plan briefly and provided an extensive written description to the Telecommunication Industry.

Mr. Yablon's response:

I'd like to clarify the intent of the plan, which I believe is misstated above by the industry. The intention of the plan is to provide a technically workable alternative for area code relief which will minimize hardships to local business and the public. Hardships would be defined as expenses to the customer and disruption of established dialing patterns to any pre-relief phone numbers.

The Unified Dialing Plan For Overlays (UDPFO) offers a way to add new numbers to a geographic area without needing to change the way that existing numbers are dialed in any manner. Established 7 and 1+10 digit dialing patterns are maintained and a new 8 digit option is enabled which allows for abbreviated dialing within and between all area codes in the geographic overlay area.

Further, it demonstrates how dialing parity (mandated by the FCC) can be maintained in an overlay without requiring the full 10 digit (or actually 1 + 10 digit) phone number to be dialed.

What the industry said in their review:

A Telecommunications industry review of the eight (8) digit dialing plan as outlined by Mr. Yablon shows that the plan attempts to address a concern among members of a community who are anticipating an Area Code split.

Mr. Yablon's response:

I would clarify the above paragraph to say instead: The dialing plan as outlined by Mr. Yablon addresses the concerns among members of a community who are considering an Area Code Overlay for relief. It addresses the issues that the public described regarding overlays during the 818 area code hearings in 1995. It also addresses the issues that the CLECs put forth during those hearings. In fact, the UDPFO was specifically tailored to resolve those overlay related issues.

What the industry said in their review:

Mr. Yablon's plan consists of a dialing scheme which attempts to preserve seven digit dialing within an overlay. Mr. Yablon's plan is based on a system of number suffixes that depend upon pauses in the dialing process creating an eight (8) digit dialing plan. While Mr. Yablon's proposal appears to enable seven-digit dialing for callers in the original NPA; callers in the overlay NPA would dial eight (8) digits. Upon closer inspection the industry concluded that Mr. Yablon's plan was unworkable for many reasons that include technical, regulatory, competitive, customer provided equipment (CPE) and customer education issues. These issues and the Telecommunications Industry's concerns are listed below:

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

Mr. Yablon's response:

More accurately, the above might read: Mr. Yablon's plan consists of a dialing system which:

- 1) Allows for optional (not mandatory) 1+10 digit dialing between all area codes in the geographic overlay area.
- 2) Unifies all area codes in the geographic overlay area with a simple 8 digit (7+suffix) dialing system. The suffix represents one of ten possible overlaid area codes with '0' being the original area code, '1' being the first overlaid area code, '2' being a future second overlaid area code, etc. When the switch receives the full 8 digits, it translates the number into a traditional 10 digit number (3 digit area code + 7 digit phone number) and passes it through the network as if the number had been originally dialed as 1+10.
- 3) Preserves established '7 digit style' dialing (see explanation below of how this default dialing is accomplished by using a 'timing delay') to all phone numbers in the original area code from any area code within the geographic overlay area.

Functionally the network switch will be looking for either 1+10 style numbers or 7+suffix style numbers. With default dialing, if only 7 digits are dialed, after an appropriate timing delay the switch will assume that '0' is the intended 8th digit and will put the call through to the original area code of the overlay area. In this way backward compatibility is achieved for dialing to 'pre-relief phone numbers' from any area code in the geographic overlay area, and the system appears completely non-disruptive to the customer.

It should be noted that while numbers in all of the area codes within the geographic overlay area can be reached by dialing either '7+suffix' or '1+10', the '7 digit default' dialing option (which requires a timing delay) applies only to numbers in the original area code and only under default conditions. On the surface this would seem to violate dialing parity, however, on closer examination it is obvious that very few people would intentionally take advantage of this option. Because of the timing delay when only 7 digits are dialed, customers will quickly opt for dialing the 8th digit (in this case '0') in order to complete calls in the most expedient way. This 7 digit option is really only provided in order to ease the transition into an overlay scenario. It eliminates the need for a permissive dialing period, ensures that any phone number that had been dialed with 7 digits in the past could still be dialed the same way, and would eliminate the need for immediately updating auto dialers and data bases. More than likely, (a short time after implementation of the UDPFO), 7 digit calls will only be initiated by auto dialers which had been programmed pre-relief (i.e. alarm system auto dialers) which are typically difficult or costly for their owners to update.

With the above summation of the 'plan', and with the following responses to the Telecommunications Industry's concerns, I hope the regulators and the industry will find it advantageous to re-open discussions about the merits and feasibility of the UDPFO.

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

Technical Issues:

What the industry said in their review:

- *The increase in real time processor delay inherent in this plan can have severe impacts on the existing public network and may have dire impacts in the future. Any increase in call delay will stress the network and render ineffective the gains in efficiency the CCS/SS7 Network provides.*

Mr. Yablon's response:

No explanation was provided with the above comments, therefore, it is difficult to respond to the comments. However, any delays that might occur would happen prior to connection to the CCS/SS7 network and would have no impact on the efficiency of the CCS/SS7 network. The industry also needs to explain what the 'severe impacts on the existing public network' would be and provide some examples of 'dire impacts in the future'.

Also, as explained earlier, very few calls will actually be intentionally made using the '7 digit default' method -- which requires a delay. Most calls within the geographic overlay area will be initiated with the '7+suffix' method which avoids the delay. With traditional relief alternatives, a large number of calls that previously only required 7 digit dialing would afterwards require dialing 1+10 digits. A better question might be "how much stress is put on the network by the additional time required to dial 1+10 digits after a split or a standard overlay is implemented?" It may very well be that the 7+suffix method of the UDPFO would result in an overall network time savings compared to 1+10 digit dialing. The network would save the time it takes for dialing those 3 extra digits.

What the industry said in their review:

- *On demand features such as Auto Call Return, Busy Number Redial and other enhanced services will be severely impacted by the need for additional digits.*

Mr. Yablon's response:

In function, all numbers dialed in the Unified Dialing Plan are translated to 10 digit numbers by the network before switching begins. This is the same way that phone numbers have been known to the network since the 1940's. It seems hard to imagine that there would be any impact on services that have already been designed to use 10 digit numbers.

What the industry said in their review:

- *The complexity of software development, time required to install switch upgrades, and the impacts upon memory capacity will severely impact switching technologies such as 5ESS, 1AESS, OSPS, AGCS GTD5, DMS 100, DMS10, TOPS and Access Tandem switches.*

Mr. Yablon's response:

Exactly what are these costs? How do they compare to the overall cost of a split or an overlay in terms of cost and disruption to both the phone companies and the public? A single area code split costs local businesses between 20 and 40 million dollars, and the phone companies spend between 6 and 10 million per split. Would the cost of developing the software and installing switch upgrades be greater than the overall cost of even 1 area code split? It is very possible that

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

developing this technology could quickly pay off as an overall savings. While it is obvious that there is a cost associated with any change to the network, it is also obvious that it is not the only cost. Until a fair assessment is done to evaluate the total cost, comments such as those made by the industry are without merit.

What the industry said in their review:

- *The increase in complex digit analysis (non-sequential digit analysis) will place undue delays in the provisioning of the Federal Communication Commission (FCC) mandated Local Number Portability (LNP) features within the North American Numbering Plan (NANP).*

Mr. Yablon's response:

The above comment is an opinion and not based on fact. As stated earlier nothing in what I am proposing changes the 10-digit format and therefore should have no impact on Local Number Portability. As currently proposed, Local Number Portability is simply intended to allow a customer to change his/her carrier without requiring a number change.

What the industry said in their review:

- *On page 3 of the plan, the second bullet indicates that switch analysis will be run examining the eight digit first. This will require post digit analysis causing a further increase in the time required to process the call.*

Mr. Yablon's response:

This comment requires a further explanation (by the industry) which should include the timing differences between the various dialing scenarios.

Regulatory Issues:

What the industry said in their review:

- *The Federal Communication Commission and the California Public Utilities Commission require 10 digit dialing with an overlay of an area code. Further, the Industry Numbering Committee has endorsed 10 digit dialing as a standard, and the expected need to move beyond the 10 digit format arrangement in the future to possibly 12 digits renders Mr. Yablon's plan unusable and unworkable.*

Mr. Yablon's response:

This plan introduces new ideas which challenge the necessity of using 1+10 digits in order to maintain dialing parity in an overlay situation. In the Unified Dialing Plan, dialing parity is provided with only 8 digits.

The 12 digit format that is planned for the future does not necessarily render this plan unusable and unworkable. In addition, it is my understanding that Local Number Portability and other actions to conserve the existing resource should delay expansion until well into the next century. However, even with expansion, if thought is given to maintaining the same backward compatibility that the Unified Dialing Plan offers for overlays, this plan can very likely co-exist with a plan requiring any new number of digits.

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

What the industry said in their review:

- Section 251 (b)(3) of the Telecommunications Act imposes a duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service. The Unified Dialing Plan's provision that incumbent customers, retain seven digit dialing while others do not appears to violate that provision.

Mr. Yablon's response:

This is a misunderstanding of how the plan works. The Unified Dialing Plan for Overlays does not violate dialing parity. All of the area codes in the UDPFO are able to initiate calls with any of the 3 available dialing options ('7 digit default', '7+suffix', or '1+10'). There is no dialing advantage or disadvantage associated with either the original area code or any of the overlaid area codes. Customers from any area code within the geographic overlay area can dial the original incumbent area code with '7 digit default' (which always requires a timing delay) -- but why would they want to, when they can make the call more expediently by simply dialing it as an 8 digit number (7digits+'0') and thus avoid the delay?

The '7 digit default' option is provided so that there is no penalty to people who already have phones and services in the original area code; who would otherwise be forced to immediately change dialing habits, update auto dialers and reprogram 'alarm type' systems from '7 digit' to '8 digit' or '1+10 digit' dialing.

Competitive Issues:

What the industry said in their review:

- The Telecommunications Act imposes a duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service. The Unified Dialing Plan's provision that incumbent customers retain seven digit dialing while others do not appears to violate that provision.

Mr. Yablon's response:

Same answer as above.

What the industry said in their review:

- Any dialing plan change would have to be agreed upon by the entire North American Telecommunications Industry.

Mr. Yablon's response:

The beauty of this plan is that it solves local dialing issues and does not affect 'dialing to' or 'dialing from' any 'outside' area codes. It could be adopted on a situation by situation basis, and would have no impact on dialing or switching for the rest of the telephone network. Universal agreement would be great, but it is unnecessary for implementation of this local solution.

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

Customer Provided Equipment (CPE) Issues:

What the industry said in their review:

- *Customer provided equipment such as PBX's, telephone key systems, speed dialers, burglar alarms, modems, Telephone Answer Service (TAS), pay telephones and auto dialers may require adaptation by the manufacture to accommodate this change. The creation of Manufacturing system standards will require agreement to this change which will entail time and dollars. Standards must be developed within National Guidelines for the Manufacturers to meet.*

Mr. Yablon's response:

The key words in the industry comments are "may require adaptation". Until the manufacturers have an opportunity to respond the remainder of the comments should not contain such statements as "will require agreement" and "must be developed". One of the main advantages of this plan is that it minimizes the impact on devices such as speed dialers, burglar alarms, and auto dialers because it eliminates the need to reprogram them when the numbers they have been set up to dial are split off into a new area code, or when 7 digit numbers need converting to 1+10 (as would be the case if a standard overlay were implemented). In most cases, PBX's, telephone key systems and pay phones would also be unaffected since the suffix logic is handled at the network switch level. At most, a PBX software change might be necessary to allow the output of the 8th digit. This would certainly be less disruptive to a PBX than a traditional area code split. Any problems that are caused may well be less significant than those caused by recent changes that have been made to the NANP, i.e. PBX problems caused by 2-9 being used for the second digit of an area code and 0-1 being used for the second digit of a prefix.

What the industry said in their review:

- *Computer Telephony Integration (CTI) products such as computer software dialing programs, dial-in/dial-back security systems and credit card validation systems may require adaptation by the developer to accommodate this change.*

Mr. Yablon's response:

There should be no effect on CTI products since all numbers will still be known to the network as 10 digit numbers, and will be still be reported by network Caller ID type systems to telephony equipment as those same 10 digit numbers. Any device on the receiving end of a call would recognize the caller in the same way that it always has.

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

Customer Issues:

What the industry said in their review:

- *The radical changes in dialing contemplated by this plan would create a formidable public education challenge.*

Mr. Yablon's response:

The '7 digit default' dialing option allows for an easy transition into the Unified Dialing Plan for Overlays. All existing numbers can still be dialed the same way that they always have been from any area code in the overlay area. All numbers can also be dialed with '1+10 digit' dialing, which is also nothing new to learn. The only new option is the '7 digit + X' suffix option, which is different, but not difficult to understand or learn. Public education is probably less of a challenge than in an area code split (where you can no longer reach certain numbers the way you have in the past) or in a standard overlay (where every number changes to 1+10, which is also different from what customers are accustomed to).

What the industry said in their review:

- *Insertion of any delay in the completion of calls will cause customer confusion, increase trouble reports, and increase customer dissatisfaction.*

Mr. Yablon's response:

Call completion delays will be minimal. As stated before, the 8 digit option would be the preferred (or dominant) dialing method in a UDPFO scenario. The '7 digit default' dialing option (which requires the timing delay) is really only offered to facilitate transition to an overlay, and it eliminates the need to immediately reprogram auto dialers and alarm systems which can be extremely time consuming and expensive to the customer (especially businesses). In a short time customers will (on their own) start using the more expedient 8 digit option.

What the industry said in their review:

- *Added call process time plus any delays in call processing due to LNP deployment will cause a large composite time delay for call completion for customers.*

Mr. Yablon's response:

The industry should be challenged on this because they should be providing actual numbers, instead of just making statements like "a large composite time delay" would result.

**MR. GILBERT YABLON'S RESPONSE AND CLARIFICATION TO THE
REVIEW BY THE CALIFORNIA TELECOMMUNICATIONS INDUSTRY OF
"THE UNIFIED DIALING PLAN FOR OVERLAYS"**

What the industry said in their review:

The industry would like to thank Mr. Yablon for the presentation of his plan. Mr. Yablon's work in attempting to eliminate dialing disparity in an overlay shows a valiant effort in creativity and analysis of a complex issue. The Telecommunications Industry is always willing to accept ideas for review and consideration.

Mr. Yablon's response:

Again, the industry has misstated the purpose of the UDPFO. The true purpose of this plan is to eliminate the expenses and hardships that customers have endured whenever area code relief has been necessary. By allowing backward compatibility for existing dialing patterns to pre-relief phone numbers, the UDPFO simplifies the public's transition to overlays and eliminates direct costs, hardships and confusion for the customer. The 8 digit dialing option that is part of the plan demonstrates how dialing parity can be maintained in an overlay without requiring the full 1 + 10 digit phone number to be dialed. This is a further convenience to the customer, and it provides a sense of 'unity' (instead of the sense of disunity) in an area where multiple area codes co-exist.

What the industry said in their review:

Unfortunately, as stated above, Mr. Yablon's plan is not a viable solution.

Mr. Yablon's response:

Taking my responses and clarifications into account, perhaps the conclusions of the industry might be re-evaluated. I believe that this plan addresses and resolves all of the public policy issues that are presented by splits and standard overlays. Given its benefits, if this plan is now given a fair evaluation by the industry in terms of "how can we make this work" instead of proclaiming "why this plan won't work", the industry will be providing its customers and our communities a great service.

Thank you very much for your time.

If you have questions or comments regarding this information, please contact me at:

818-999-1070 (voice/voice mail)
818-956-2200 (alt. voice)
818-956-3298 (fax)

UNIFIEDdpo@AOL.com (email)

Gilbert Yablon
The Unified Dialing Plan for Overlays
21914 Dumetz Rd.
Woodland Hills, CA 91364

ATTACHMENT 5

INC ISSUE #141 (THE INDUSTRY NUMBERING COMMITTEE'S REVIEW)

The following page makes up ATTACHMENT 5

INDUSTRY NUMBERING COMMITTEE (INC) ISSUE IDENTIFICATION FORM
ISSUE TITLE:
Non-Disruptive Alternatives for Area Code Relief Using Overlays

ISSUE ORIGINATOR: Gilbert Yablon
COMPANY: Unified Dialing Plan for Overlays
TELEPHONE #: 818-999-1070
REQUESTED RESOLUTION DATE:
Long before NANPE.

ISSUE #: 141
DATE SUBMITTED: 7/13/98
DATE ACCEPTED: 7/13/98
WORKSHOP ASSIGNED: NPA
CURRENT STATUS: Resolved
RESOLUTION DATE: 1/25/99

1. **ISSUE STATEMENT:** Current NPA relief methods present hardship and expense for local business and the public. A serious and comprehensive evaluation of technically workable, non-disruptive alternatives is warranted. It is estimated that a single area code split costs customers between 20 and 40 million dollars. The transition to 10 digit dialing in overlays is also expensive since all local auto-dialers need to be updated, and efficient abbreviated dialing patterns are permanently abandoned. The disruption from both splits and overlays is taking a toll on the American people. Articles written almost daily accurately portray the magnitude of the problem. The Unified Dialing Plan for Overlays proposes an abbreviated local dialing system which allows 8 digit dialing between traditional 10 digit NPAs in an overlay. It also provides a non-disruptive mechanism for preserving established dialing patterns to existing 7 and 1+10 digit numbers. The plan can co-exist with some of the current proposals for NANPE, and still provide benefit to customers at that time.
2. **SUGGESTED RESOLUTION OR OUTPUT/SERVICE DESIRED:** It is important for the industry to evaluate this plan, both technically and conceptually, with an "outside of the box approach". Look at the benefits it offers customers over the current alternatives, and determine how this plan, or a variation of it, can be considered as one of the available options for area code relief.
3. **OTHER IMPACTS (if any):** North American Numbering Plan Expansion.
4. **CURRENT ACTIVITY:** INC38 - Issue accepted and assigned to NPA Workshop.
INC39 - A presentation was given on the plan by Mr. Yablon. After discussion the Workshop agreed that it could progress the issue no further. A resolution to the issue will be developed at INC40 to place the issue in Initial Closure.
INC40 - Various contributions received from Mr. Yablon. Issue placed in Initial Closure.
INC41 - Issue placed in Final Closure.

5. RESOLUTION

The INC identified and discussed the following technical and public policy concerns about Non-Disruptive Alternatives for Area Code Relief Using Overlays:

- Competitive Dialing Issues
- Different Network and Operations Support Systems vs. Current 10 Digit Overlay Implementation Requirements
- Network Timing Issues (i.e., Post Dialing Delay and Announcement Duration)
- Telephone Directories and Listing Services
- End User Concerns
- CPE Impacts
- Concerns About Implementation Costs
- Ubiquitous Deployment Issues (e.g., National Carriers)

Consequently, the INC decided against further work on this issue as it currently exists.

6. **UPDATED:** 1/25/99

PERSONAL TECHNOLOGY

New Area Code's a Wrong Number for Some Security Systems

TELECOM TALK

By ELIZABETH DOUGLASS
TIMES STAFF WRITER

Apartment building and condominium owners and residents from Redondo Beach to Malibu and from Gardena to Beverly Hills are learning a hard and costly lesson about area code overlays.

Throughout the 310 area code territory, building security and dial-up telephone entry systems inexplicably stopped working, leaving visitors and delivery workers stranded outside. Building owners and managers were deluged with frantic calls.

"We couldn't figure out what was wrong, the equipment just wasn't dialing," said Philip C. Gould, president of a 27-unit condominium association in Westwood. "It hit a lot of people."

The culprit: the addition of a second area code in the 310 region using the "overlay" method.

The state-approved plan that went into effect April 17 calls for two area codes to serve the same geographic territory and requires callers in the region to dial 1 and the area code and the number.

The four extra digits, however, tripped up many building security and entry systems that are programmed to handle seven-digit phone numbers. Such dial-up systems typically allow visitors to key in a resident's code (often two or three digits), triggering the system to dial the resident's pre-programmed phone number.

"It wipes out both the security systems and the entry systems, so the impact is quite pronounced," said Harold Greenberg, president of the Apartment Assn. of Greater Los Angeles, which serves building owners and managers covering 300,000

units. "Everybody got caught flat-footed on this, and they're frantic."

There are an estimated 13,562 apartment and condominium buildings in the 310 overlay region, representing about 187,000 units, according to figures from Marcus & Millichap, a Palo Alto-based real estate brokerage.

Greenberg estimated that up to 70% of the buildings have systems old enough to need a major upgrade.

Newer dial-up entry systems can be fixed by upgrading the circuit board inside and reprogramming all the phone numbers, according to Bill Lamb, owner of Lamb Security Systems in South El Monte. New boards cost from \$475 to \$575 each, Lamb said, and the total cost depends on the amount of phone-number reprogramming.

Systems 3 years or older, however, may not be upgradeable, which means building owners would have to replace the equipment. Replace-

ment costs range from \$1,400 to \$3,000, Lamb said.

Complicating the situation, many suppliers have been flooded with orders, and it can take several days or weeks for buildings to fix the problem. And until the problems are fixed, the systems won't work.

Harris Properties, a Culver City firm that manages apartment and condominium buildings, started upgrading entry equipment in January and spent \$15,000 to \$20,000 to outfit 30 buildings before 11-digit dialing began, according to Lionel Harris, president of the firm.

Once the new dialing system took effect, Harris said, one of the precious new computer boards was stolen. Harris, who said the board was probably taken by a vendor who was short on supplies, had to re-secure all the equipment to prevent further thefts.

Gould said his building in Westwood, populated primarily by older

residents, went without its entry system for about a week—raising concerns about emergency access, among other things.

"We were quoted a price of \$2,100 for the new equipment," Gould said, "and we had to go for it because we couldn't go out to bid and put people's lives in danger" with the delay.

State and federal regulators have long touted area code overlays as a method that is cheaper for the public than a traditional geographic split.

In a geographic split, a new area code is assigned. That can result in changes to stationery, business cards and potentially lost business if customers don't know about the new phone number.

But the entry-system problem shows that the overlay method has its costs as well.

Residents and businesses in the 310 region, for example, also have

had to pay to have their alarm systems reprogrammed or upgraded. In addition, some elevator emergency phones are not programmed to handle 11-digit dialing, and it can cost about \$150 per elevator to fix the problem.

Meanwhile, dialing 11 digits on every call—even those within the same area code—is continuing to stir rancor within 310.

The region's second area code, 424, is scheduled to begin being issued on July 17. But some legislators and others are urging the state to delay the introduction of 424 so other number conservation efforts can be tried.

For now, however, building owners and others in 310 have no choice but to pay for upgrades or replace dial-up systems.

Elizabeth Douglass can be reached at elizabeth.douglass@latimes.com.

ATTACHMENT 6

ATTACHMENT 7

SMALL BUSINESS

Bill to Put Area Code Switches on Hold Has Support of Entrepreneurs

A bill that would impose a state-wide moratorium on area code changes is hitting a nerve with angry small-business owners who want an end to code confusion.

The Encino, West Hollywood and Beverly Hills chambers of commerce have endorsed AB 818, introduced by Assemblyman Wally Knox (D-Los Angeles). The California



AT ISSUE
VICKI TORRES

Chamber of Commerce and the California Small Business Assn. are watching its progress. And small-business owners hurt by area code switches say it's about time somebody did something.

The bill, which goes before the Assembly Utilities and Commerce Committee next week, would impose a moratorium on area code changes beginning Jan. 1. It also would require the California Public Utilities Commission to work out alternative solutions to satisfying the demand for new phone numbers before creating more area codes.

Southern California businesses already struggle with 13 area codes. Five more will

be in use by May 2000, and three others are proposed. They involve splits—cutting areas in two and adding a new area code—and overlays—imposing a new area code for all new users in old areas.

"I'm all for a moratorium, because it's been a colossal hassle having Costa Mesa split up the way it is," said Jennifer Stockland, owner of Costa Mesa Florists, who last year had to change her area code from 714 to 949.

"We're constantly having to ask people what the area code is and then we get the wrong one," she added. "It divides the city. We've had to have everything reprinted, business cards, pamphlets, you name it."

Area code changes can be a nightmare for businesses because the telephone number is a lifeline to customers, said Charles Carbone, a consumer advocate with the Utility Consumers' Action Network, a San Diego-based consumer rights organization with about 8,000 small-business owners among its 40,000 members.

"If it's not easy to get hold of you, and you're in a highly competitive product or service, your customer is not going to wait," Carbone said. "They're going to go immediately to your competitor, whose number they have in front of them."

Business owners say that overlays, touted as the solution to area code splits, create their own problems, such as saddling a growing business with two area codes. Danny Ruiz, pharmacist at Statscript Pharmacy in West Hollywood, fears that adding a phone line with the 424 area code, when he already has 310, will confuse his elderly customers, who may stop turning to him for prescriptions and medical advice.

Laria Phippen, interim president of the West Hollywood Chamber of Commerce, says the city is only 1.9 square miles but will have three area codes—310, 323 and 424—when the new 424 overlay takes effect in July.

For companies that rely on local identity, the lack of a geography-specific area code can damage business, as Stockland, the Costa Mesa florist, well knows. Out-of-state customers seeking a local florist felt confident that they were getting a bona fide Costa Mesa florist when she had a 714 area code, Stockland said. But since the change to 949 last year, long-distance phone customers now question her location, thinking she's moved outside the city.

"We hear personal, heartbreaking stories," said Mary Jo Borak, a regulatory analyst with the PUC, who regularly holds public hearings on area codes. (The PUC has not taken a position on Knox's bill.) Borak said one Oakland business owner, who repairs big-rig truck axles, told state officials his area code losses came to \$50,000, because he relied on business cards handed out to truckers.

When Oakland switched from 415 to 650, he had no way to notify thousands of truckers across the nation about his outdated phone number. Although he spent \$30,000 in additional advertising, his business still declined by \$20,000 in one year, Borak said.

Knox insists that the technology exists to provide area code relief, but that industry and PUC inertia, plus a conflicting maze of federal and state regulations, block the solution and create number hoarding and area code chaos.

In California, for example, an estimated 180 million phone numbers are available under current area codes, but only 30 million are in use, according to PUC Commissioner Henry Duque. Yet the push for more area codes continues.

The reason is the inefficient way phone service computers and software keep track of phone numbers assigned to service carriers. The equipment keeps track, not of individual numbers, but of the prefix, the first three digits of each seven-digit phone number.

ATTACHMENT 7 (continued)

Each prefix has 10,000 available numbers. A new phone company, for example, gets 10,000 numbers at a time for each relatively small geographic area, even if it wants only 3,000 numbers.

Demand from small-business owners and others with one or two voice lines, a fax line, Internet connections, pagers, cell-phones and even car phones is not the problem. The allocation system is the problem.

Fixing that problem will require not only Knox's bill in California, but also action at the federal level. The North American phone numbering system, if left as is, has a shelf life of only 20 years, according to federal estimates.

The Federal Communications Commission is considering a proposal to conserve numbers using existing technology. The proposals include assigning numbers individually or in smaller blocks of 1,000, called "number pooling," to phone service carriers. Hearings may be held later this year, but any proposed solution would take three to four years to implement and involve substantial expense and reprogramming of equipment by major carriers.

Relief Efforts Appear Stalled

The telecommunications industry has begun looking at expanding the number of digits used in phone numbers by one or two numbers. Telephone system equipment here and abroad would have to be changed, as well as consumer phone equipment, phone-reliant equipment such as alarms and databases with phone numbers, in addition to the expense of informing others.

At the state level, progress on area code relief appears stalled because California's phone carriers are not willing to undertake number pooling voluntarily. The PUC says it is blocked from ordering carriers to take such conservation measures because of a September FCC ruling in a Pennsylvania case, Borak said.

For its part, the FCC denies that

it has blocked mandatory pooling, saying it encourages states to submit plans and citing the example of Illinois, where mandatory number pooling recently received FCC approval.

The dispute is symbolic of the misunderstandings and conflicts in authority that exist between state and federal communications officials, with each pointing a finger at the other for stalled progress and delays. It helps explain why phone users keep shouldering the burden of more area codes when demand actually is coming from telecommunication companies and not users.

Knox's bill attempts to break through the logjam by requiring the PUC to seek FCC permission for number pooling, to set aside certain area codes for machines such as faxes and modems, and to reassign and recycle disconnected numbers faster.

"I don't think for a moment I've worked out the answer or resolution, but it's clear to me someone needs to play a role," Knox said.

For online information about area codes, go to <http://www.cpuc.ca.gov> or <http://www.pacbell.com>.

Times staff writer Vicki Torres can be reached at (213) 237-8553 or at vicki.torres@latimes.com.

ATTACHMENT 8

Los Angeles Times

SATURDAY, FEBRUARY 21, 1998

COPYRIGHT 1998/THE TIMES MIRROR COMPANY/F/CCF 122 PAGES

Critics See No Need for New Area Codes

By JUBE SHIVER Jr.
TIMES STAFF WRITER

WASHINGTON—The costly and disruptive nationwide explosion of area codes has long been blamed on popular gadgets such as fax machines and wireless phones, but critics are now charging that the shortage of telephone numbers is largely artificial.

Regulators in nearly half a dozen states are moving to impose moratoriums on new area codes out of concern that the burgeoning telephone industry is warehousing a vast reservoir of numbers instead of giving them to new customers.

Poor management of telephone numbers, coupled with a refusal by the

Please see PHONES, A20

PHONES: ATTACHMENT 8 (continued)

Continued from A1

telephone industry to invest in new technology, is driving a need for more new area codes than are necessary, they say.

The repeated changes of area codes, particularly in California, have inconvenienced tens of millions of U.S. consumers and saddled businesses with huge costs, triggering a growing consumer backlash that has caught federal regulators by surprise.

"Telephone number assignment policies are broken and antiquated and reflect the old Ma Bell monopoly when there was only one phone company serving a geographic area," said John Hanger, a Pennsylvania Public Utilities Commissioner. "The current system is lunacy. It has to end."

The telephone industry denies that it has created an artificial shortage, arguing that it does not have the technology to avoid creating area codes. Critics say the technology does exist but that the phone companies find it cheaper to create area codes than invest in more sophisticated switching equipment.

Each area code change costs companies as much as \$40 million, according to one Pennsylvania estimate. Consumers are forced to reprogram their computers and home burglar alarms, as well as notify friends and relatives.

Over the past three years, the number of U.S. area codes has surged 67%. The impact is especially large in California, which by the end of this year will have more than doubled the 10 area codes the state had in 1991. Exactly how much number hoarding is going on in California is unclear.

But of the 1.5 billion possible phone numbers created by the existing 193 area codes nationwide, about half a billion are not actively used, according to Lee Selwyn, a Boston consultant who is assisting Illinois regulators in examining the issue.

Selwyn said there are enough surplus telephone numbers to eliminate more than 60 area codes. The telephone industry acknowledges that there are surplus telephone numbers, but has not disclosed its estimates.

The recent rise in area codes, many experts agree, is more a case of the proliferation of new phone companies than the fast-growing communications technologies traditionally blamed for the increase.

There are 55 million cellular phones in operation and 45 million pagers, besides the 174 million residential and business phone lines, according to industry estimates. (Each business line, however, can support up to 24 telephones.)

Every carrier licensed by the government to offer service in a state is entitled to order phone numbers. And in most instances, because there is no penalty for overestimating demand, they load up. As a result, phone competition can easily send the arithmetic of phone numbers off the charts.

The problem starts with the technology of switching equipment, which requires that allotments of telephone numbers be made in batches of 10,000. But in many cases phone or paging companies do not have customers for that many numbers.

The Pennsylvania Utility Commission found that some local phone companies holding blocks of 10,000 numbers had given fewer than half a dozen to subscribers.

As competition in the telephone industry heats up, more phone companies are seeking batches of phone numbers.

In California, there are more than 60 carriers licensed to offer wireless or local phone service in the state. To compete statewide, each of those carriers needs an allotment of 10,000 numbers in each of 725 local dialing areas: a total of 7.25 million phone numbers for each company.

Regulators Ponder How to Deal With 310 Region

Yet another area code is on the way, this time targeting the 310 area, but code administrators could not decide whether to divide the region again or issue a second area code to work within the existing 310 boundaries.

The decision, which is up to state regulators, will affect Los Angeles County and a small part of Ventura County.

If the state chooses to split the region, a new area code would be assigned for El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Compton, Carson, Torrance, Gardena, Catalina Island, the Palos Verdes Peninsula, part of Inglewood and most of Hawthorne.

The new code would be introduced July 17, 1999.

Meanwhile, the "get acquainted" period for the new 626 area code expires early today.

—ELIZABETH DOUGLASS

Massive shifts in area codes are wreaking havoc on many businesses.

John Bauer, a Fort Lauderdale food importer-exporter, said the region's recent addition of the 954 area code cost him several thousand dollars in direct expenses and untold lost business from overseas customers whose telephone equipment cannot handle new U.S. area codes without the traditional "0" or "1" in the middle.

To cope with the problem, Bauer said, he maintains a separate telephone number in the old 305 area code that serves Miami, and has calls forwarded to him in Fort Lauderdale.

"We've had to change everything," Bauer said. "There must be a better way than constantly changing area codes. It's a real pain."

Around the nation, consumer opposition to area code proliferation is hardening.

The Ohio town of Parma last year presented former FCC Chairman Reed Hundt with petitions signed by 4,000 residents opposed to the addition of a 440 area code.

Hundt said later he was surprised by the depth of the public outcry, having never seen another case "where so many citizens have complained about the process." But state officials say that consumer anger over area codes should come as no surprise.

In Georgia, Public Service Commissioner Stan Wise said that if his state were to implement "an area code split, people would march on the Capitol."

The nation's area code system has been controlled by the Baby Bells and their research arm, Bellcore. But under a plan devised by an FCC advisory group, known as the North American Numbering Council, that authority is being transferred over the next year to contractor Lockheed Martin Corp. But whether Lockheed can stop the proliferation of area codes will depend on new technology.

In the current system, a caller dials seven to 11 numbers and initiates a series of electronic negotiations that makes a connection or results in a busy signal. When the number is received by the central office telephone switch, it checks to see whether the first digit is a "1." If so, it knows the call is long distance and sends the call to the designated long

distance company for processing.

The long distance company examines the area code and three-number prefix to route the call to the local switch that controls the dialed phone number. Engineers say these central office switches are the Achilles' heel of the system.

They require that telephone numbers be allocated in blocks of 10,000 because the switches are not smart enough to route calls unless all the numbers within a prefix belong to a single carrier. And carriers need blocks of 10,000 for each local dialing area or so-called rate center.

Critics say that more sophisticated switches are available that can handle calls to prefixes that are shared by more than one telephone company. Such technology would delay the need for new area codes for several years, Selwyn said.

Pennsylvania, Illinois and some other states are pressuring the phone industry to modify the phone network so that numbers could be allocated in units of 1,000 or less.

But some numbering officials say that the telephone industry is years away from updating the nation's phone network to allocate numbers in the smaller quantities sought by state regulators.

"We have to fix the network and that's a big and complicated job," said Ron Connors, director of the Lockheed operation that manages the phone number system. "There are more than 10,000 switches out in the phone network. The problem is not that we are running out of phone numbers; it's that we are running out of these blocks of 10,000 units."

But faced with increasingly frequent requests to add area codes, irate state officials are vowing to crack down on area code proliferation.

Hanger and his four colleagues on the Pennsylvania Public Utility Commission last summer rejected request to create area codes in a vast area of the state covered by the 215, 610 and 717 area codes and ordered the industry to conserve phone numbers instead. The states of Virginia, New Jersey and Illinois are weighing similar bans.

Selwyn, who is president of Economics and Technology Inc., said the area code explosion has been exacerbated by a 1995 Federal Communications Commission decision barring states from giving mobile phone users their own telephone area code.

He noted that New York City, the nation's largest telephone market and the last area allowed to segregate wireless carriers by area code, has added only one area code in the last 12 years—other than the 917 code set aside for wireless carriers in 1992. By contrast, Chicago and Los Angeles have each added five or more area codes in that period.

But the FCC argues that segregating cellular users by area code would be unfair because they would be the only consumers required to dial 11 digits for local calls.

The FCC does not oppose all overlays, which can help deal with demand for new telephone numbers. Unlike geographically splitting an area code in two, overlays superimpose a new area code on a region for new customers and existing customers retain their area codes. But the downside is that everyone would have to dial 11 numbers to make a local call.

Nonetheless, state regulators see overlays for wireless as a partial solution. The Connecticut Department of Public Utility Control voted last month to segregate all wireless services in their own area code and said it would ask the FCC to reconsider its prohibition.

Officials of the wireless industry, which is signing up 28,000 subscribers a day, say that they shouldn't be singled out for blame for area code proliferation.

At the current pace of number use, the available pool of three-digit area codes will be exhausted about 30 years.

Area Codes 6/9/99

■ How is it we have to confuse ourselves so much with additional area codes and overlays within those areas, when many cities in Europe and Japan have merely added one single digit (and often the same digit) to existing numbers to handle the problem of demand for more telephone numbers? It is a lot easier to remember to just add the same number to everyone's old number than to try and figure out what new and unknown three-digit area code has been invented.

ROBERT SHARP
South Pasadena

ATTACHMENT 9

■ The only long-term solution to the area code problem is to make every home telephone number nine digits instead of seven. Why not set a date where every phone number in the country is lengthened by adding two zeros to the end of the number?

This way we keep a simpler area code map and avoid these terrible overlays. As more numbers are required, they can end in 01, 02, etc., right up to 99. It makes two fewer digits for everyone living with an area code overlay.

TIMOTHY BOND
Hollywood

2-15-99 Altadena

Area Codes

■ Re Jacob Tom's Voices piece, Jan. 30: I have long wondered why California is unable to implement eight-digit phone numbers. I sent correspondence to the PUC with this suggestion and received no reply. The phone companies of America seem to have assured a messy future by not changing their equipment to allow for a one-time change to eight-digit phone numbers.

Not only could Los Angeles regain the 213 area code throughout the entire city, but everyone would make the change at once, thereby eliminating future regional changes.

Learn from Hong Kong, England, Australia, Singapore and Japan, and go to eight-digit phone numbers; it's a solution that works.

MARK NEUMANN
Lakewood

4-29-99

Area Codes

■ The loss of business due to new area code changes must be enormous—this system of changing these codes is disruptive and fatal for some businesses. Customers cannot locate their party after they are told by a telephone voice, "Sorry, your call cannot be completed as dialed." It's a little late to change this system, but not too late to start a new way of adding telephone numbers.

For example, adding one digit to the present 10 numbers would augment the system with 99,999,999 new numbers for each present area code, thereby assuring enough numbers until the 22nd century.

JOEL KAYE
Sherman Oaks

Phone Codes

■ Instead of more area codes, couldn't customers have the flexibility of adding a mnemonic at the end of their seven digits: W for work, F for fax, P for pager and C for cellular, for example? This would allow one main phone number to replace as many as four separate numbers. As it is, area codes have strayed from their original design of having the second number always being lower than the first and third numbers (e.g., 213, 508, 617), which was designed to help differentiate the area code from the actual number.

Most people cannot retain sequences of more than seven digits. This mnemonic character approach would help reduce the proliferation of new codes that no longer adhere to the original area code format.

BRUCE M. GALE
Los Angeles

3-25-99 Stevenson Ranch

11-Digit Dialing

■ Re new telephone "overlay" codes that require people to dial 11 digits (March 19): The telephone companies have devised the most inefficient number system since Roman numerals—add one new phone number to a filled-up area and the result is an 11-digit number for everyone, even for local calls!

LEWIS H. COHEN
Riverside

Area Codes

■ Splitting an area code into two area codes doubles the available phone numbers. However, simply adding another digit to existing phone numbers (making them eight numbers instead of seven leads to a tenfold increase in phone numbers for an area code. And isn't it easier to remember one more number rather than three?

Existing numbers could all just have a zero added to them. What about this easy solution?

ALAN C. WEINBERG
Fullerton

ATTACHMENT 9 (continued)

F / SATURDAY, JANUARY 30, 1999

B15

VOICES

A FORUM FOR COMMUNITY ISSUES

Gripe

One City, One Area Code

By JACOB TOM

In the past 10 years, Pacific Bell telephone has added five new area codes to the L.A. area that needlessly inconvenience and complicate the essential tasks of dialing a telephone. I remember a time when a single area code—213—represented the city of Los Angeles. Now the greater L.A. area involves nine area codes, more than any single state except for California and Texas.



Los Angeles is America's second-largest populated area and it is growing. In the past decade, there has been an unprecedented proliferation of telecommunications devices such as cell phones, beepers, modems and faxes that strain the finite amount of assigned phone numbers. New York City is larger in population but it only has three area codes. The majority of the 50 largest cities in America have only a single area code, including Washington, Miami, Denver, Boston, Houston, St. Louis, Minneapolis, Phoenix, Cleveland and San Diego.

The proliferating hodgepodge system of area codes in L.A. is ex-

ceptional and extremely unnatural in the world of telecommunications. The roots of the problem lie in history. Phone numbers have been seven digits for more than 50 years because that number provided an adequate number of permutations to match the demand for assignable phone numbers. But the increased urbanization and the creation of telecommunications devices like the beeper, modem and fax resulted in demand outstripping supply.

The problem with introducing new area codes is it heralds an era of instability and nonpermanence. In the next 10 years, there will be more demand for phone addresses and thus the number of area codes will proliferate rather than reduce.

I believe technology exists for our convenience. We should make it conform to our needs, not vice-versa.

I propose that we adopt an eight-digit local phone number, which would have an adequate number of assignable phone numbers to again be unified by a single area code, and yet also be fewer numbers to dial.

Mathematically, seven digits—i.e. 999-9999—permits the largest number to be 9,999,999 or approximately 10 million permutations. For perspective, the L.A. metropolitan population is approximately 10.1 million. Eight digits provides 10 times this

amount or 100 million permutations. For perspective, the U.S. population is approximately 270 million. This plan could accommodate 10 times the current number of phones in a single area code and thus accommodate all nine area code numbers into one area code.

This new phone system would superimpose an additional digit in the first position of the standard seven numbers. There could be some basic order such that operator services and government agencies would begin with 0 or 9. Long distance numbers begin with a 1. Residences would begin with 2, 3 or 4. Commercial organizations would begin with 5, 6, 7 or 8. Even numbers would be voice phone. Odd numbers would be non-voice devices like faxes and beepers. It may be the whole country would be converted to eight digits.

Los Angeles is a city with problems of centralization, as witnessed by the secession movement in the San Fernando Valley. It is further fragmented by the telecommunication system, which balkanizes the region into arbitrary divisions that make neither geographic nor intuitive sense. We need a long-term solution, not a patchwork of short-term area codes.

Jacob Tom is a senior radiology resident.

Gripe

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion Regarding
Commission Policy on Area Code Relief.

R 98-12-014
(Filed December 17, 1998)

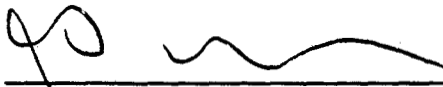
**COMMENTS OF GILBERT J. YABLON REGARDING 8-DIGIT DIALING FOR
OVERLAYS, FILED PURSUANT TO ADMINISTRATIVE LAW JUDGE TIMOTHY
KENNEY'S RULING OF JUNE 29, 1999**

VERIFICATION

I, Gilbert J. Yablon, am one of the parties in the above-entitled matter; the statements in the foregoing documents are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 23, 1999 at Los Angeles, California

Signed  _____
Gilbert J. Yablon

The following is the service list for CPUC Proceeding R 98-12-014.

All names on this list were mailed copies of the documents to which this list has been attached.
This list was obtained from the CPUC web site on 7/23/99

Appearance

NORMAN A. PEDERSEN
ATTORNEY AT LAW
JONES DAY REAVIS & POGUE
1450 G STREET, N.W.
WASHINGTON, DC 20005

ROBERT G. BERGER
WINSTAR WIRELESS, INC.
1146 19TH STREET, N.W., 2ND FLOOR
WASHINGTON, DC 20036

DAVID J. GUDINO
GTE COMMUNICATIONS CORPORATION
HQK03B67
6665 N. MCARTHUR BOULEVARD
IRVING, TX 75038

ALAN L. PEPPER
MITCHELL SILBERBERG & KNUPP LLP
TRIDENT CENTER
11377 W OLYMPIC BLVD., SUITE 200
LOS ANGELES, CA 90064-1683

STEVEN G. LINS
OFFICE OF THE CITY ATTORNEY
CITY OF GLENDALE
613 EAST BROADWAY, STE 220
GLENDALE, CA 91206-4394

GILBERT J. YABLON
SMART DIALING SYSTEMS
21914 DUMETZ ROAD
WOODLAND HILLS, CA 91364

BILL NEILL
PRIVATE CITIZEN, PROFESSIONAL ENGINEER
PO BOX 33666
SAN DIEGO, CA 92163-3666

GREGORY L. CASTLE
PACIFIC TELESIS GROUP
ROOM 1627
140 NEW MONTGOMERY STREET
SAN FRANCISCO, CA 94105

GLENN STOVER
ATTORNEY AT LAW
AT&T COMMUNICATIONS
795 FOLSOM STREET, ROOM 670
SAN FRANCISCO, CA 94107

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

RUSSELL M BLAU
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
3000 K STREET NW SUITE 300
WASHINGTON, DC 20007

MATTHEW H. BERNIS
FOCAL COMMUNICATIONS CORP. OF CALIFORNIA
200 N. LASALLE STREET
CHICAGO, IL 60601

ROBERT W. MCCAUSLAND
V.P., REGULATORY & INTERCONNECTION
ALLEGIANCE TELECOM OF CALIFORNIA, INC.
1950 STEMMONS FREEWAY, SUITE 3026
DALLAS, TX 75207-3118

BETTY JO TOCCOLI
CA. SMALL BUSINESS ASSN./CAL. SMALL BUSI
#342
6101 WEST CENTINELA AVENUE
CULVER CITY, CA 90230

SUSAN ROSSI
GTE OF CALIFORNIA INCORPORATED
LEGAL DEPARTMENT
ONE GTE PLACE, CA500LB
THOUSAND OAKS, CA 91362-3811

TERRY B. STEVENSON
OFFICE OF THE CITY ATTORNEY
CITY OF BURBANK
275 EAST OLIVE AVENUE
BURBANK, CA 91510-6459

ANDREW ULMER
CALIF PUBLIC UTILITIES COMMISSION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARY E. WAND
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
425 MARKET STREET
SAN FRANCISCO, CA 94105

JILLISA BRONFMAN
ATTORNEY AT LAW
BECK & ACKERMAN
FOUR EMBARCADERO CENTER RM 760
SAN FRANCISCO, CA 94111

DAVID J. MARCHANT
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, STE 600
SAN FRANCISCO, CA 94111-3834

BETSY STOVER GRANGER
PACIFIC BELL WIRELESS
4420 ROSEWOOD DRIVE, 4TH FLOOR
PLEASANTON, CA 94588

DOUGLAS F. CARLSON
POST OFFICE BOX 12574
BERKELEY, CA 94712-3574

PENNY H. BEWICK
DIRECTOR, GOVT AFFAIRS/PRODUCT SUPPORT
ELECTRIC LIGHTWAVE, INC.
ELECTRIC LIGHTWAVE, INC.
4400 NE 77TH AVENUE
VANCOUVER, WA 98662-0678

Information Only

JOSEPH KAHL
DIRECTOR REGULATORY AFFAIRS
RCN TELECOM SERVICES, INC.
105 CARNEGIE CENTER
PRINCETON, NJ 08540

JUDITH ST. LEDGER-ROTY
ESQUIRE
KELLEY DRYE AND WARREN LLP
1200-18TH STREET N.W., STE 500
WASHINGTON, DC 20036

ESTHER H. ROSENTHAL
REGULATORY COUNSEL
FIRST WORLD COMMUNICATIONS
9339 GENESEE AVENUE, STE 100
SAN DIEGO, CA 92121

KATHRYN A. FUGERE
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, 9TH FLOOR
SAN FRANCISCO, CA 94111

CHARLES E. BORN
DIRECTOR, REGULATORY AFFAIRS
CITIZENS COMMUNICATIONS
7901 FREEPORT BLVD., SUITE 200
SACRAMENTO, CA 95832

State Service

BARBARA ORTEGA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEROME F. CANDELARIA
CALIFORNIA CABLE TELEVISION ASSOCIATION
4341 PIEDMONT AVENUE
OAKLAND, CA 94611

DANIEL B. HARRISON
INTERIM EXECUTIVE DIRECTOR
LEAGUE OF CALIFORNIA CITIES
1400 K STREET, SUITE 400
SACRAMENTO, CA 95814

BARRY PINELES
REGULATORY COUNSEL
GST TELECOM, INC.
4001 MAIN STREET
VANCOUVER, WA 98663

JIM DEAK
REGIONAL DIRECTOR-NPA RELIEF PLANNING
NORTH AMERICAN NUMBERING PLAN ADM.
1133 15TH STREET, N.W.
WASHINGTON, DC 20005

JEFFREY M. PFAFF
ATTORNEY AT LAW
SPRINT PCS - LEGAL/REGULATORY
4900 MAIN STREET, 11TH FLOOR
KANSAS CITY, MO 64112

HEIDI SIECK WILLIAMSON
DEPT OF TELECOMMUNICATIONS & INFORMATION
CITY & COUNTY OF SAN FRANCISCO
875 STEVENSON STREET, 5TH FLOOR
SAN FRANCISCO, CA 94103

JERRY JAZMADARIAN
TELCOMMUNICATIONS MANAGER
COUNTY OF PLACER
2809 SECOND STREET
AUBURN, CA 95603

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
MARKET DEVELOPMENT BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY KENNEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5020
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a copy of the COMMENTS OF GILBERT J. YABLON REGARDING 8-DIGIT DIALING FOR OVERLAYS, FILED PURSUANT TO ADMINISTRATIVE LAW JUDGE TIMOTHY KENNEY'S RULING OF JUNE 29, 1999 and all of its referenced Attachments, pertaining to CPUC proceeding number R 98-12-014, on all parties of record in this proceeding or their attorneys of record.

Dated July 23, 1999 at Los Angeles, CA

Signed

A handwritten signature in black ink, appearing to be "G. Yablon", written over a horizontal line.

Gilbert J. Yablon



Andrew Isar, Director - Industry Relations

Telecommunications
Resellers
Association

4312 92nd Ave., N.W.
Gig Harbor, WA 98335

Tel: 253-265-3910
Fax: 253-265-3912
E-mail: aisar@harbor-group.com

Via Facsimile and Regular Mail

10 September 1999

Ms. Blanca Bayó
Division of Records
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunther Building
Tallahassee, FL 32399-0850

981444 990970
981834

RE: Change of Address Notification

Dear Ms. Bayó:

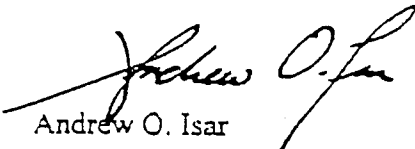
This is to advise the Commission that effective immediately, the address and telephone numbers for the Telecommunications Resellers Association's (TRA) state regulatory contact have changed. Communication or notices regarding Commission proceedings directed to TRA should be sent to:

Mr. Andrew O. Isar
Telecommunications Resellers Association
3220 Uddenberg Lane
Suite 4
Gig Harbor, WA 98335
Telephone: 253.851.6700
Facsimile: 253.851.6474

Thank you for your kind attention to this matter. Questions may be directed to the undersigned.

Sincerely,

Telecommunications Resellers Association


Andrew O. Isar

Done 9/13/99



Andrew Isar, Director - Industry Relations

Telecommunications
Resellers
Association

4312 92nd Ave., N.W.
Gig Harbor, WA 98335

Tel: 253-265-3910
Fax: 253-265-3912
E-mail: aisar@harbor-group.com

FACSIMILE COVER SHEET

Date: 10 September 1999

To: FL PSC Division of Records

Facsimile Number: 850.413.7118

From: Andrew Isar

No. of Pages Including Cover: 2

If there is any difficulty in receiving this transmission, please call 253.851.6700.

Notes:

RECEIVED-PPSC
09 SEP 10 PM 2:46
RECORDS AND
REPORTING

CONFIDENTIALITY NOTICE

This transmittal and accompanying documents are intended only for the use of the individual or entity to which they are addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, the reader is hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone to arrange for the retrieval of these documents. Thank you.

M E M O R A N D U M

September 28, 1999

RECEIVED-FPSC

SEP 28 PM 3:41

RECORDS AND
REPORTING

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF LEGAL SERVICES (CALDWELL) *dwc p/fz lb*

RE: DOCKET NO. 981444-TP - NUMBER UTILIZATION STUDY:
INVESTIGATION INTO NUMBER CONSERVATION MEASURES.

Attached is a Notice of Workshop to be issued in the above-referenced docket. (Number of pages in notice - 2)

DWC/sa
Attachment
cc: Division of Communications
I:981444ws.dwc

FPSC, CLK - CORRESPONDENCE
~~X~~ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

172
10/1
10/1

NW/
59/6.

MORRISON & FOERSTER LLP

Attorneys at Law

2000 Pennsylvania Avenue, N.W.

Washington, D.C. 20006-1888

Telephone: (202) 887-1500

Facsimile: (202) 887-0763

RECEIVED-FPSC

99 OCT -4 PM 5: 37

1999 OCT -4 P 2: 29
RECORDS AND
REPORTING**To: Records & Reporting**
Florida Public Service Commission**Facsimile: 850-413-7118**
Phone: 850-413-6770**From: Theresa L. Pringleton**
Legal Assistant**Date: October 4, 1999**

We are transmitting a total of 3 pages (including this page).
Original or hard copy to follow if this box is checked ☐.

If you do not receive all pages, please call (202) 887-8755 as soon as possible.

Preparer of this slip has confirmed that facsimile number given is correct: 6576/TLP/24865/7

This facsimile contains confidential information which may also be privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not copy, use, or distribute it. If you have received it in error, please advise Morrison & Foerster LLP immediately by telephone or facsimile and return it promptly by mail.

Comments:

MORRISON & FOERSTER LLP

SAN FRANCISCO
LOS ANGELES
SACRAMENTO
ORANGE COUNTY
PALO ALTO
WALNUT CREEK
DENVER

ATTORNEYS AT LAW

2000 PENNSYLVANIA AVENUE, NW
WASHINGTON, D.C. 20006-1888
TELEPHONE (202) 887-1500
TELEFACSIMILE (202) 887-0763

NEW YORK
LONDON
BRUSSELS
BEIJING
HONG KONG
SINGAPORE
TOKYO

Writer's Direct Dial Number

(202) 887-8755
tpringleton@mofo.com

October 4, 1999

Via Facsimile

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 981444-TP
Number Utilization Study: Investigation into Number Conservation
Measures

Dear Ms. Bayo:

The purpose of this letter is to request that the following names be added to the official Commission service list for the docket listed above:

Tom Foley
Lockheed Martin IMS
NPA Relief Planner
8200 Riverbend Boulevard
Longwood, FL 32779-2327
Phone: (407) 389-8929
Fax: (407) 682-1108
E-mail: thomas.foley@nanpa.com

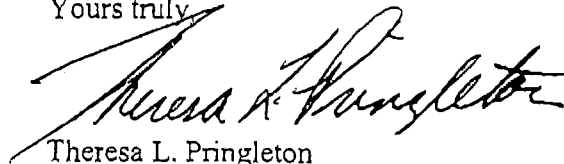
Kimberly D. Wheeler, Esq.
Morrison & Foerster, LLP
2000 Pennsylvania Ave. NW, Suite 5500
Washington, D.C. 20006
Phone: (202) 887-8750
Fax: (202) 887-0763
E-mail: kwheeler@mofo.com

MORRISON & FOERSTER LLP

Page Two

If you have any questions regarding this matter, please contact me at the address or telephone number listed above.

Yours truly

A handwritten signature in black ink, appearing to read "Theresa L. Pringleton". The signature is fluid and cursive, with a large initial "T" and "P".

Theresa L. Pringleton
Legal Assistant

PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A.
ATTORNEYS AT LAW

SAMUEL P. BELL, III
DOUGLAS S. BELL
KEVIN X. CROWLEY
MARK K. DELEGAL
MARC W. DUNBAR
PETER M. DUNBAR
MARTHA J. EDENFIELD
ROGELIO J. FONTELA
WILLIAM H. HUGHES, III
A. KENNETH LEVINE

JOHN J. MATTHEWS
EDGAR M. MOORE
E. MURRAY MOORE, JR.
BRIAN A. NEWMAN
JULIUS F. PARKER III
JOHN C. PELHAM
CARL R. PENNINGTON, JR., P.A.
C. EDWIN RUDE, JR.
GARY A. SHIPMAN
CYNTHIA S. TUNNICLIFF

WILLIAM E. WHITNEY
BEN H. WILKINSON
CATHI C. WILKINSON

OF COUNSEL
ROBERT CINTRON, JR.
R. STUART HUFF, P.A.
Coral Gables, Florida
CHRISTOPHER W. KANAGA
(Admitted in Massachusetts & Colorado Only)
BARBARA J. STAROS

215 SOUTH MONROE STREET
SECOND FLOOR
TALLAHASSEE, FLORIDA 32301

(850) 222-3533
FAX (850) 222-2126
E-Mail: pete@penningtonlawfirm.com

REPLY TO:
P.O. BOX 10095
TALLAHASSEE, FL 32302-2095

October 4, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

via Facsimile
413-7118

Dear Ms. Bayo:

This firm represents Time Warner Telecom in the following dockets:

960100	920260
961230	960980
961346	960725
960847	960786
950984	950985
981444	

The following address for Time Warner appears on the list of interested parties in the above-listed dockets:

Time Warner (TN)
Regulatory Affairs/Marek
P.O. Box 210706
Nashville, TN 37221
Phone: 615-673-1191
Fax: 615-673-1192

Done 10/04/99

RECEIVED-FPSC
99 OCT -5 AM 10:26
RECORDS AND
REPORTING

RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION
99 OCT -5 AM 8:39
MAIL ROOM

Ms. Blanca Bayo, Director
October 4, 1999
Page Two

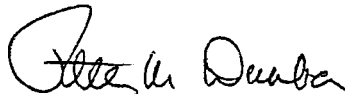
The post office box will soon be closed, therefore, please replace Time Warner's address in each of the above-listed dockets with the following address:

Time Warner Telecom
Carolyn M. Marek, Vice President
Regulatory Affairs, Southeast Region
233 Bramerton Court
Franklin, TN 37069
Phone: (615) 376-6404
Fax: (615) 376-6405

Thank you for your assistance in this matter. If you have any questions, please contact Karen Camechis at 222-3533.

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

A handwritten signature in black ink, appearing to read "Peter M. Dunbar", written in a cursive style.

Peter M. Dunbar

PMD/kmc

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

Writer's Direct Dial No.

(850) 425-2313

October 6, 1999

JAMES S. ALVES
BRIAN H. BIBEAU
RICHARD S. BRIGHTMAN
KEVIN B. COVINGTON
PETER C. CUNNINGHAM
RALPH A. DEMEO
RANDOLPH M. GIDDINGS
WILLIAM H. GREEN
WADE L. HOPPING
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
FRANK E. MATTHEWS
RICHARD D. MELSON
ANGELA R. MORRISON
GABRIEL E. NIETO
ERIC T. OLSEN

GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
WILLIAM D. PRESTON
CAROLYN S. RAEPPEL
DOUGLAS S. ROBERTS
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
ROBERT P. SMITH
DAN R. STENGLE
CHERYL G. STUART
W. STEVE SYKES
T. KENT WETHERELL, II
—
OF COUNSEL
ELIZABETH C. BOWMAN

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RECEIVED-FPSC
99 OCT -6 PM 4:43
RECORDS AND
REPORTING

Re: Number Utilization Study -- Docket No. 981444-TP

Dear Ms. Bayó:


Please update your service list to delete Mr. Thomas Bond as a designated representative of MCI in this docket and substitute Donna McNulty at the following address:

Donna McNulty
MCI WORLDCOM, Inc.
325 John Knox Road, The Atrium
Suite 105
Tallahassee, FL 32303

By copy of this letter, I am asking the parties to update their service lists accordingly.

If you have any questions, please give me a call.

Very truly yours,



Richard D. Melson

RDM/mee

cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 6th day of October, 1999.

American Network Exchange, Inc.
Amy Gross
100 W. Lucerne Circle, # 100
Orlando, FL 32801

City of Lakeland
Mr. Gary Lawrence
501 East Lemon Street
Lakeland, FL 33801-5079

Peggy Arvanitas
c/o RE/MAX First Class Inc.
620 Bypass Drive
Clearwater, FL 33764

Cole Law Firm
J.D. Thomas
1919 Pennsylvania Ave., NW
Washington, DC 20006-3458

AT&T Communications of the
Southern States, Inc.
Ms. Rhonda P. Merritt
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

David B. Erwin, Esq.
127 Riversink Road
Crawfordville, FL 32327

AT&T Wireless Services of
Florida, Inc.
William Higgins
11760 N. US Hwy, 1, W Tower 3rd FL
North Palm Beach, FL 33408

Department of Management Services
Carolyn Mason
4050 Esplanade Way, Rm. 135B
Tallahassee, FL 32399-0950

Ausley Law Firm
Lee Willis/Jeffrey Wahlen
P.O. Box 391
Tallahassee, FL 32302

Ervin Law Firm
Everett Boyd
P.O. Drawer 1170
Tallahassee, FL 32302

Beard and Associates
Thomas Beard
1549 State Street
Sarasota, FL 34236

Executive Office of the Governor
Office of Planning and Budget
General Government Unit
The Capitol, Rm. 1502
Tallahassee, FL 32399-0001

BellSouth Mobility, Inc.
1100 Peachtree St. NE #910
Atlanta, GA 30309-4599

Florida Cable Telecommunications
Assoc., Inc.
Michael Gross
310 N. Monroe Street
Tallahassee, FL 32301

Bryant Law Firm
201 S. Monroe St, #500
Tallahassee, FL 32301

Florida Competitive Carriers Assoc.
c/o J.P. Gillan and Associates
P.O. Box 541038
Orlando, FL 32854

Cellular One of Southwest Florida
2100 Electronics Lane
Ft. Myers, FL 33912-1605

Florida Public Telecommunications
Assoc.
Angela Green
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Florida Telephone Assoc.
Susan Langston
P.O. Box 1776
Tallahassee, F:l 32302

Foley & Lardner Law Firm
Marcus Williams
3000 K St., NW, #500
Washington, DC 20007

Foley & Lardner Law Firm
Domenic Altomare
P.O. Box 240
Jacksonville, Fl 32202-3527

Holland Law Firm
Bruce May
P.O. Drawer 810
Tallahassee, FL 32302

Hyperion Telecommunications of
Florida, Inc.
Lee McDowell
5 W.3rd St.
Coudersport, FL 16915-9210

Independent Telecommunications
Network, Inc.
Sam LaMartina
8500 W. 110th St., #600
Overland Park, KS 66210

Intermedia Communications of
Florida, Inc.
Mr. Steven Brown
3625 Queen Palm Drive
Tampa, FL 33619-1309

International Speedway Corp.
David Hickman
P.O. Box 2801
Daytona Beach, FL 32120-2801

Jacksonville Teleport LC
2516 Edison Ave.
Jacksonville, FL 32204-2530

L.W. Lang
1200 Peachtree St., #6120
Atlanta, GA 30309

MCI Telecommunications
Don Price
701 Brazos, #600
Austin, TX 78701

MCI Telecommunications
Woody Taylor
2400 N. Glenville Dr., Dept. 0415
Richardson, TX 75082

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, Fl 32302

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., 812
Tallahassee, FL 32399-1400

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Pennington Law Firm
Peter Dunbar/Barbara Auger
P.O. Box 10095
Tallahassee, FL 32302

Rutledge Law Firm
Kenneth Hoffman/John Ellis
P.O. Box 551
Tallahassee, FL 32302

Senate Committee on Regulated
Industries
John Guthrie
418 Senate Office Bldg.
Tallahassee, FL 32399

Swidler & Berlin
Rindler/Falvey
3000 K St. NW, #300
Washington, DC 20007

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551

Telecommunications Resellers
Assoc.
Andrew Isar
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98335

Charles Rehwinkle
Sprint-Florida Inc.
1313 Blairstone Road
Tallahassee, FL 32301

Teleport Communications Group,
Inc.
Frederik Cedarqvist
Two Teleport Dr., 3rd FL
Staten Island, NY 10311

Time Warner
Regulatory Affairs/Marek
P.O. Box 210706
Nashville, TN 37221

Time Warner Communications
Carolyn Marek, VP, Regulatory
Affairs
Southeast Region
233 Bramerton Court
Franklin, TN 37069

Time Warner Telecom
2301 Lucien Way, Suite 300
Maitland, FL 32751

Utilities and Telecommunications
(State House)
Bill Tabor
410 House Office Bldg.
Tallahassee, FL 32399

Nancy White
c/o Nancy Sims
BellSouth Legal Dept.
150 S. Monroe Suite 400
Tallahassee, FL 32301

Kim Caswell
GTE Florida Incorporated
P.O. Box 110 FLTC0007
Tampa, FL 33601

Diana Caldwell
Florida Public Service Commission
Legal Department
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard

Attorney

From: KAREN @ SMTP {karen@penningtonlawfirm.com}
To: Chip Orange
Subject: fwd: update of e-mail address on website

===NOTE=====10/01/99=10:47am=====

Return-Path: <karen@penningtonlawfirm.com>
Received: from mork.lansoft.net (206.101.106.242)
by mail.psc.state.fl.us (Connect2-SMTP 4.30A.1000128)
for <corange@psc.state.fl.us>; Fri, 1 Oct 1999 10:55:50 -0400
Received: from LOCAL by QUATRO with SMTP id 018DA934;
Fri, 01 Oct 1999 10:55:56 Eastern Daylight Time
To: <corange@psc.state.fl.us>
Sender: karen@penningtonlawfirm.com
From: <karen@penningtonlawfirm.com>
Date: Fri, 1 Oct 1999 10:47:05 -0400
Subject: update of e-mail address on website
Return-Receipt-To: karen@penningtonlawfirm.com
X-Message-UIDL: AKDICFFL
Mime-Version: 1.0
Content-Type: text/plain; charset="us-ascii"
Content-Description: Message Body
Content-Transfer-Encoding: 7BIT

I represent Time Warner and need to update the e-mail address for the person listed as the Time Warner contact on the PSC website.

If you go to the list of ALECs, and select Time Warner Connect, the e-mail address for Carolyn Marek is marek.carol@aol.com. This address is obsolete and should be updated to carolyn.marek@twtelecom.com.

Could you also include the new address under the Time Warner Telecom listing?

Also, could you search the website and update her address each time it appears?

Please let me know if you have any questions or whether I need to contact someone else to update the address.

Thanks!

Karen Camechis

Fwd=by:=Chip=Orange==10/01/99=11:35am=====

Fwd to: KAREN @ SMTP {karen@penningtonlawfirm.com}
CC: Hong Wang, Nonnye Grant

.....
I am forwarding your request on to our records and reporting division for further processing. In future, you may contact them at (850) 413-6770.

920260	961230
950984	961346
950985	981444
960100	981834
960786	990321
960847	
960980	

Done

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA N. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 10/22/99

TO: Robin Norton
FROM: L. Williams, DIVISION OF RECORDS AND REPORTING
RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A *CONFIDENTIAL DOCUMENT*
FILED IN DOCKET NO. 99/444-TP OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING Response to Staff Data Requests, AND
(GENERAL DESCRIPTION)
FILED ON BEHALF OF Global NAPS. THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

From: Diana Caldwell
To: Kay Flynn
Subject: fwd: 981444

CONFIRMED

====NOTE=====10/25/99==5:17pm=====

I had a conversation with Beth and Cathy. All ALECs, IXC's, and LECs should be designated as parties. Only companies not in that category need to intervene. We should send notices out to all when we do something. Any questions? give me a call at 413-6175. THANKS>

Fwd=by:=Kay=Flynn=====10/25/99==5:23pm=====

Fwd to: Diana Caldwell
CC: Hong Wang

.....

No questions! We will make this entry on the parties list in CMS based on your e-mail.

Fwd=by:=Diana=Caldwel=10/26/99==8:52am=====Fwd to: Kay Flynn

.....

thanks. We will try to keep things concise!

Fwd=by:=Kay=Flynn=====10/26/99==3:10pm=====

Fwd to: Diana Caldwell

.....

In keeping with that idea, will it be okay NOT to send CASRs to the parties in this docket. Because the list is so very extensive, we would not be able to fax the CASRs--they would have to mailed. Postage each time a revised CASR is mailed would run over \$200. The docket schedule is available on the Internet, and parties will receive all procedural orders and notices that schedule or change dates and times. We normally send approved and revised approved CASRs to parties in dockets, and can certainly send particular revised CASRs in this one if necessary. What do you think?

Fwd=by:=Diana=Caldwel=10/26/99==3:27pm=====

Fwd to: Beth Keating, Kay Flynn

.....

I guess that we will not modify the CASR. Maybe we can do one notice to let everyone know to check for further changes. NOT send the notice til we make a change or set a schedule, but add the notice then? How does this sound?

Fwd=by:=Kay=Flynn=====10/26/99==3:38pm=====

Fwd to: Diana Caldwell
CC: Blanca Bayo, Hong Wang

.....

If the CASR isn't revised again (if docket goes to ag 12/21), parties will receive the agenda notice and then the PAA and CO orders. We can just leave the question of sending CASRs to be addressed if necessary. (I should have looked at the schedule before I brought up the question!)

From: Diana Caldwell
To: Kay Flynn
Subject: fwd: 981444

CONFIRMED

====NOTE=====10/25/99==5:17pm=====

I had a conversation with Beth and Cathy. All ALECs, IXC's, and LECs should be designated as parties. Only companies not in that category need to intervene. We should send notices out to all when we do something. Any questions? give me a call at 413-6175. THANKS>

Fwd=by:=Kay=Flynn=====10/25/99==5:23pm=====

Fwd to: Diana Caldwell CC: Hong Wang

.....

No questions! We will make this entry on the parties list in CMS based on your e-mail.

Fwd=by:=Hong=Wang=====10/26/99==8:18am=====

Fwd to: Kay Flynn

.....

Do we want all ALECs, IXC's and LECs to receive CASRs?

Fwd=by:=Kay=Flynn=====10/26/99==8:21am=====

Fwd to: Hong Wang

CC: Blanca Bayo

.....

I believe we should make an executive decision NOT to send them CASRs, because of the cost involved. I'll run by Blanca to be sure she concurs. Blanca?

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIAN JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 10/26/99

TO: M. Gogan
FROM: J. Williams, DIVISION OF RECORDS AND REPORTING
RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A *CONFIDENTIAL DOCUMENT*
FILED IN DOCKET NO. 981444-TP OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING Response to 9/24/99 Data Req., AND
FILED ON BEHALF OF Bell South (GENERAL DESCRIPTION). THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

RECEIVED-FPSC

99 NOV -2 AM 10: 23



RECORDS AND
REPORTING

Date: October 29, 1999

To: Florida Public Service Commission

From: Frantesta Parson

Re: Change of Address for Fredrik Cederqvist

To Whom It May Concern,

We have received your mailing concerning Docket No. 981444-TP – Number Utilization Study: Investigation into Number Conservation Measures.

Please make a note of the following address change for Fredrik Cederqvist. Mr. Cederqvist was previously located at the following address:

Fredrik Cederqvist
Teleport Communications Group, Inc.
2 Teleport Drive
Suite 300
Staten Island, NY 10311-1001

He is now located at the following address:

Fredrik Cederqvist
AT&T
Room 2A114
900 Routes 202/206 N
Bedminster, NJ 07921

If you have any questions, please contact me at (908) 234-5022.

Thank you.

gone 11/02/99

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

Wednesday, October 20, 1999
9:00am - Room 148

RECEIVED-FPSC

99 NOV -3 PM 2:21

RECORDS AND
REPORTING

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 98144-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
Brent A. Struthers	Lockhead Martin	847 836 0785	847 836 2201	bstruthers@mpac.com
Deborah Nobles	Northeast Fla Tele Co	904-259-0639	904-259-7722	dnobles@neflom.net
Hoke R. Knox	SARANT	913-624-1317	913-624-1327	Hoke.Knox@MAIL.SARANT.COM
Dana Smith	PrimeCo	817 258 1036	817 258 1805	dsmith@primeco.com
Kelly Faul	MCI WorldCom	703-918-0457	703-918-6814	Kelly.faul@worldcom.com
CHARLIE BECK	OPC	850 487 8240	850 488 4491	BECK.CHARLES@LFG.STATE.FL.G
Ken Hoffman	Omaipoint Comm	850-681-6788	850-681-6515	Ken@reuphew.com
Tim Decker	MCI WorldCom	912-656-1630	912-656-1444	Tim.Decker@worldcom.com

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

Wednesday, October 20, 1999
9:00am - Room 148

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 981444-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
Tom Reichenberger	Aerial Communications	813-243-3205	813-243-1906	reit2@aerial1.com
Donna McNulty	MCI WorldCom	850-422-1254	850-422-2586	donna.mculty@ucom.com
Eddie Gray	GTE Wireless	678-339-4412	678- ³³⁹ 850 -8572	Egray@MobiNet.gte.com
DAVID CHRISTIAN	GTE	850-224-3963	850-222-2912	david.Christian@telops.gte.com
Earl Pouchen	OPC	850-487-8242		earlpouchen@juno.com
Michael Gross	FCTA	850-681-1990	850-681-9676	mgross@fcta.com
Floyd Self	ATT & AWS	850-222-0720	850-224-4359	fself@lawfla.com
CHARLES REHWINKEL	SPRINT	850/847-0244	850-878-0777	CHARLES.J.REHWINKEL@MAIL.SPRINT.COM

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

Wednesday, October 20, 1999
9:00am - Room 148

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 981444-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
Bill SHAUGHNESSY	Bell South	404-927-1364	404-885-9820	bill.shaughnessy1@bridge.bellsouth.com
Bey Menard	GTE	813-483-2526	813-223-4888	beverly.menard@telops.gte.com
Kim Caswell	GTE	813-483-2617	813-204-8870	kimberly.caswell@telops.gte.com
STAN GREER	Bell South	850-224-5139	850-222-8640	SGREER@bridge.bellsouth.com
Cheryl Gordon	ALLTEL	501-905-8508	501-905-5913	Cheryl.Gordon@ALLTEL.com
SANDY KHAZRAEE	SPRINT	850-847-0173	850-8780777	SANDY.A.KHAZRAEE@sprint.mail.com
Holly Henderson	GTE Wireless	678-339-4261	678-339-8551	whenderson@mobile.net.gte.com
Bill BROWN	BellSouth Cellular	404-249-0486	404-249-0453	Bill-Brown@bscc.bellsouth.com
Carolyn Mason	DMS-InfoTechnology	850/922-7503	850-488-9837	masonc@clms.state.fl.us
Jimm Martin	" "			martinj@clms.state.fl.us
Scott Ludwickski	Sprint PCS	913-315-2611	913-315-2532	sludw@sp.sprintpcs.com

**FLORIDA PUBLIC SERVICE COMMISSION
WORKSHOP SIGN-IN**

(Please Print)

NAME	REPRESENTING	PHONE NO.
Ken Hoffman	Omnipoint Communications	850/681-6788
Bill Brown	BellSouth Cellular Corp.	404/249-0486
Cheryl Gordon	ALLTEL Communications	501-905-8503
Dana Smith	PrimeCo Personal Communications	817-258-1036
Scott Ludwinski	Sprint PCS	913-315-2611
HOKE R. KNOX	SPRINT	913-624-1317
SANDRA A. KHAZRAEE	SPRINT	850-847-0173
Michael A. Grass	FC TA	850-681-1990
Rhonda Merritt	AT&T	850-425-6342
Carolyn Mason	Dept Management Services - Info. Technology	850/922-7503
JIM MARTIN	" " " " "	850/922-7445
Tom McLabe	TDS Telecom / Quincy	850/875-5207
Tim Decker	NET WORLD COM	912.656-1630

Socket 110. 781444-18
Area Code Number Conservation

(Please Print)

BUSINESS + FAX

[illegible]

RECEIVED-FPSC

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

99 NOV -3 PM 2:21

Wednesday, October 20, 1999
9:00am - Room 148

RECORDS AND
REPORTING

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 981444-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
B. H. SHAUGHNESSY	Bell South	404-927-1364	404-885-9520	b.h.shaugnessy1@bridge.bellsouth.com
Bey Menard	GTE	813-483-2526	813-223-4888	beverly.menard@telops.gte.com
Kim Caswell	GTE	813-483-2617	813-224-8870	kimberly.caswell@telops.gte.com
STAN GREER	Bell South	850-224-5139	850-222-8640	SGREER@bridge.bellsouth.com
Cheryl Gordon	ALLTEL	501-905-8508	501-905-5913	Cheryl.Gordon@ALLTEL.com
SANDY KHAZRAEE	SPRINT	850-847-0173	850-8780777	SANDY.A.KHAZRAEE@sprint.mail.com
Holly Henderson	GTE Wireless	678-339-4261	678-339-8551	hhenderson@emobility.gte.com
Bill Brown	BellSouth Cellular	404-249-0486	404-249-0453	Bill-Brown@bscc.bellsouth.com
Carolyn Mason	DMS-InfoTechnology	850/922-7503	850-488-9837	masonc@clms.state.fl.us
Jimm Martin	" "			martinj@clms.state.fl.us
Scott Ludwikowski	Sprint PCS	913-315-2611	913-315-2532	sludw@ie.sprint.spectrum.com

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

Wednesday, October 20, 1999
9:00am – Room 148

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 981444-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
Tom Reichenberger	Aerial Communications	813-243-3205	813-243-1906	reit2@aerial1.com
Donna McNulty	MCT Worldcom	850-422-1254	850-422-2586	donna.mculty@ucom.com
Eddie Gray	GTE Wireless	678-339-4412	678- ³³⁹ 839 -8572	gray, P. M. @telops.gtc.com
DAVID CHRISTIAN	GTE	850-224-3963	850-222-2912	david.christian@telops.gtc.com
Earl Pouchen	OPC	850-487-8242		earlpouchen@junc.com
Michael Gross	FCTA	850-681-1990	850-681-9676	mgross@fcta.com
Floyd Self	ATT and AWS	850-222-0720	850-224-4359	fself@lawfla.com
CHARLES REHWINKEL	SPRINT	850/847-0244	850-878-0777	CHARLES.J.REHWINKEL@MAIL.SPRINT.COM

**FLORIDA PUBLIC SERVICE COMMISSION
STAFF WORKSHOP**

Wednesday, October 20, 1999
9:00am - Room 148

**NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION
MEASURES (DOCKET NO. 981444-TP)**

Name	Affiliation	Telephone Number	Fax Number	E-mail address
Brent A. Struthers	Lockheed Martin	847 836 0785	847 836 2201	bstruthers@npl.com
Deborah Nobles	Northern Telecom	904-259-0639	904-259-7722	dnobles@nec.com.net
Hoke R. Knox	Sprint	913-624-1317	913-624-1327	Hoke.Knox@MAIL.SPRINT.COM
Dana Smith	PrimeCo	817 258 1036	817 258 1805	dsmith@primeco.com
Kelly Faul	McI WorldCom	703-918-0457	703 918-6814	kelly.faul@worldcom.com
CHARLIE BECK	OPC	850 487 8240	850 488 4491	BECK.CHARLES@LEG.STATE.FL.B
Ken Hoffman	Omnipoint Comm	850-681-6288	850-681-6515	Ken@omnipoint.com
Tim Decker	McI WorldCom	912-656-1630	912-656-1444	Tim.Decker@worldcom.com

Area Code Number Conservation

(Please Print)

[illegible]

**FLORIDA PUBLIC SERVICE COMMISSION
WORKSHOP SIGN-IN**

(Please Print)

NAME	REPRESENTING	PHONE NO.
Ken Hoffman	Omnipoint Communications	850/681-6788
Bill Brown	BellSouth Cellular Corp.	404/249-0486
Cheryl Gordon	ALLTEL Communications	501-905-8503
Dana Smith	PrimeCo Personal Communications	817-258-1036
Scott Ludwinski	Sprint PCS	913-315-2611
HOKE R. KNOX	SPRINT	913-624-1317
SANDRA A. KHAZRAEE	SPRINT	850-847-0173
Michael A. Gross	FC TA	850-681-1990
Rhonda Merritt	AT&T	850-425-6342
Carolyn Mason	Dept Management Services - Info. Technology	850/922-7503
JIM MARTIN	" " " "	850/922-7445
Tom McCabe	TDS Telecom / Quincy	850/875-5207
Tim Decker	NET WORLD COM	912-656-1630

RECEIVED-FPSC

99 NOV -4 AM 11:39

M E M O R A N D U M

November 4, 1999

RECORDS AND
REPORTING

TO: DIVISION OF RECORDS AND REPORTING *plc*
FROM: DIVISION OF LEGAL SERVICES (CALDWELL) *QWC*
RE: DOCKET NO. 981444-TP - NUMBER UTILIZATION STUDY: IN
VESTIGATION INTO NUMBER CONSERVATION MEASURES

Attached is a Memorandum to All Parties to be issued in the
above-referenced docket. (Number of pages in memorandum - 1)

DWC/sa
Attachment
cc: Division of Communications (Ileri)
I:981444#3.dwc

Parties only.

*mailed as
self-mailed -*

834 - mailed.

FPSC, CLK - CORRESPONDENCE
~~X~~Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

From: Levent Ileri
To:
Blanca Bayo, Diana Caldwell, John
Cutting
Subject: fwd: Commutel Inc.

===NOTE=====11/10/99==2:31pm=
I received a phone call from Ms. Emilia
DeQuesada regarding Docket No. 981444-TP's
mailing issues.

981444

She indicated that they get our docs
either on the same day of the meeting or
2-3 days late.

Her number is: (305) 220-6966
and fax number is: (305) 220-6922

She prefers to get the docs by fax rather
than actual mailing.

How can we help her?

Thanks,

Levent

Fwd=by:=Blanca=Bayo==11/10/99==2:40pm=
Fwd to: Hong Wang
CC: Levent Ileri

.....
Hong, would you please research this for
me and let me know what you find out.
Thanks.

Fwd=by:=Levent=Ileri==11/10/99==2:51pm=
Fwd to: Blanca Bayo, Hong Wang
CC: Diana Caldwell

.....
I talked with Diana and she said that we
will keep her in our e-mail list so that
she can get the info as quickly as the
others. Thank you for your help.

Fwd=by:=Diana=Caldwel=11/10/99==2:55pm=
Fwd to: Hong Wang, Levent Ileri

.....
this is because she indicated that she
wanted to participate in the task force
workshops that we will be having over the
next few months. Otherwise, we will still
be sending out stuff by mail to keep every
one else informed.

Fwd=by:=Hong=Wang=====11/10/99==3:11pm=
Fwd to: Blanca Bayo
CC: Diana Caldwell, Levent Ileri

.....
Blanca, FYI. Also, I have checked CMS and
this lady is not listed on the mailing
list individually. However,
telecommunication industries are listed as
groups. Levent, do you know who she is
with? Do you have more info on this lady?
Diana, should we still put she on our

mailing list so we have a record? We can just list her phone number, fax number and e-mail address without the mailing address, so nothing will go out by mail.
Fwd=by:=Diana=Caldwel=11/10/99==3:16pm=
Fwd to: Hong Wang, Levent Ileri

.....
Ms. Amelia DeQuesada with Commutel should be added to the mailing list in records for docket no. 981444. We (staff/ i.e. Levent) will include her in our fax/e-mail list as she has indicated that she wants to participate in our task force work as a representative of her company (Commutel).

Fwd=by:=Hong=Wang=====

Fwd to: Blanca Bayo

CC: Diana Caldwell, Levent Ileri

.....
FYI, I have added Communitel, Inc. in CMS with all info available to us.

From: Levent Ileri
To:
Blanca Bayo, Diana Caldwell, John
Cutting
Subject: fwd: Commutel Inc.

===NOTE=====11/10/99==2:31pm=
I received a phone call from Ms. Emilia
DeQuesada regarding Docket No. 981444-TP's
mailing issues.

981444

She indicated that they get our docs
either on the same day of the meeting or
2-3 days late.

Her number is: (305) 220-6966
and fax number is: (305) 220-6922

She prefers to get the docs by fax rather
than actual mailing.

How can we help her?

Thanks,

Levent

Fwd=by:=Blanca=Bayo==11/10/99==2:40pm=
Fwd to: Hong Wang
CC: Levent Ileri

.....
Hong, would you please research this for
me and let me know what you find out.
Thanks.

Fwd=by:=Levent=Ileri==11/10/99==2:51pm=
Fwd to: Blanca Bayo, Hong Wang
CC: Diana Caldwell

.....
I talked with Diana and she said that we
will keep her in our e-mail list so that
she can get the info as quickly as the
others. Thank you for your help.

Fwd=by:=Diana=Caldwel=11/10/99==2:55pm=
Fwd to: Hong Wang, Levent Ileri

.....
this is because she indicated that she
wanted to participate in the task force
workshops that we will be having over the
next few months. Otherwise, we will still
be sending out stuff by mail to keep every
one else informed.

Fwd=by:=Hong=Wang=====11/10/99==3:11pm=
Fwd to: Blanca Bayo
CC: Diana Caldwell, Levent Ileri

.....
Blanca, FYI. Also, I have checked CMS and
this lady is not listed on the mailing
list individually. However,
telecommunication industries are listed as
groups. Levent, do you know who she is
with? Do you have more info on this lady?
Diana, should we still put she on our

just list her phone number, fax number and
e-mail address without the mailing
address, so nothing will go out by mail.

Fwd=by:=Levent=Ileri==11/10/99==3:13pm=

Fwd to: Hong Wang

CC: Blanca Bayo, Diana Caldwell

.....

I got her mailing address as:

Emilia DeQuesada

Director

Communitel Inc.

11890 SW 8th Street Suite 212

Miami FL 33184

dequesada@communitelusa.com

(305) 220-6966 (305) 220-6922

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIAN JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 11/3/99

TO: RUTLEDGE (HOFERMAN)
FROM: MATLOA, DIVISION OF RECORDS AND REPORTING
RE: **ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING**

THIS WILL ACKNOWLEDGE RECEIPT OF A *CONFIDENTIAL DOCUMENT*
FILED IN DOCKET NO. 981444-TP OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING AERIALS PER CONFID, AND
FILED ON BEHALF OF AERIALS (GENERAL DESCRIPTION) THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA N. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

A-C-K-N-O-W-L-E-D-G-M-E-N-T

DATE: 11/3/99

TO: RUTLEDGE (Hoffman)
FROM: MATILDA, DIVISION OF RECORDS AND REPORTING
RE: ACKNOWLEDGMENT OF RECEIPT OF CONFIDENTIAL FILING

THIS WILL ACKNOWLEDGE RECEIPT OF A **CONFIDENTIAL DOCUMENT**
FILED IN DOCKET NO. 981444-TP OR (IF FILED IN AN UNDOCKETED
MATTER) CONCERNING 2nd REQ CONFIDENTIAL, AND
(GENERAL DESCRIPTION)
FILED ON BEHALF OF MB OPERATIONS. THE
DOCUMENT WILL BE MAINTAINED IN LOCKED STORAGE.

ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO
KAY FLYNN AT (850) 413-6744.

PSC/RAR 19 (1/99)

RECEIVED-FPSC

NOV 12 AM 9:59

M E M O R A N D U M

November 10, 1999

RECORDS AND
REPORTING

TO: DIVISION OF RECORDS AND REPORTING
FROM: DIVISION OF LEGAL SERVICES (CALDWELL) *DWC* *pk*
RE: DOCKET NO. 981444-TP - NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER CONSERVATION MEASURES

Attached is a Memorandum to All Parties to be ^{FAX} issued in the above-referenced docket. (Number of pages in memorandum - 1)

DWC/sa
Attachment
cc: Division of Communications (Ileri)
I:981444#4.dwc

FPSC, CLK - CORRESPONDENCE
~~X~~Administrative Parties Consumer
DOCUMENT NO. 05529-06
DISTRIBUTION: _____

4 faxed
B21 Self
number

FOWLER, BARICE, FEENEY & O'QUINN, P.A.

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

JAMES A. FOWLER
CAROLE JOY BARICE, P.A. *
THOMAS C. FEENEY, III, P.A.
MICHAEL A. U. O'QUINN, P.A.**
MARY L. SNEED

*Board Certified City, County & Local Government Law

**Also licensed in Georgia

EMPIRE BUILDING
28 W. CENTRAL BLVD.
ORLANDO, FLORIDA
32801

TELEPHONE: (407) 425-2684
TELEFAX: (407) 425-2690
E-MAIL: FBFO@FWO.com

RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION
00 JAN 13 AM 8:36
MAIL ROOM

RECEIVED-TPSC
00 JAN 13 AM 11:18
RECORDS AND
REPORTING

January 10, 2000

Ms. Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

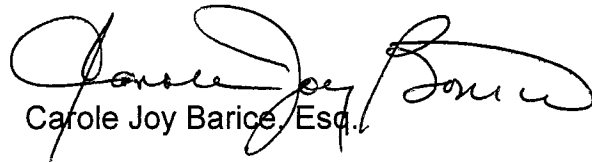
Dear Ms. Bayo:

Please include the undersigned as counsel for the City of Deltona, Florida, as an interested party to receive copies of notices, testimony and filings in the following case:

Case # 98-1444 Number Conservation Docket

Ms. Diana Caldwell of your legal office advised me of this procedure prior to our making this request. Thank you for your assistance and cooperation.

Sincerely,


Carole Joy Barice, Esq.

CJB/klh

A:\(KRISTYDISK1)\CJB\DELTONA\LETTERS\98-1444.NCD

Done 1/18/00

Hong Wang

To: thomas.foley@neustar.com
Cc: Kay Flynn
Subject: 981444

Mr. Foley, I have updated your address in Docket 981444. The former address was entered in the docket pursuant to the letter from Morrison and Foerster dated October 4, 1999.

Please feel free to contact me via e-mail or by telephone at 850-413-6770 if you need further assistance.

> -----Original Message-----

> From: Thomas Foley [mailto:thomas.foley@neustar.com]

> Sent: Tuesday, January 04, 2000 3:35 PM

> To: 'corange@psc.state.fl.us'

> Subject: Docket 981444

>

>

> Chip,

>

> Happy New Year!

>

> I have a request, maybe circumvent PSC "red tape". In the above docket, my

> address is incorrect; it should be 820 Riverbend Blvd, not 8200 Riverbend;

> probably just a typo along the way. The Post Office has told me they won't

> deliver to me at that address anymore.

>

> Thanks.

>

>

> Thomas C. Foley

> NPA Relief Planner

> 407-389-8929

>

Monte Reddish

From: WIMSETT.GARY [WIMSETT.GARY@leg.state.fl.us]
Sent: Thursday, January 13, 2000 3:19 PM
To: 'Monte Reddish'
Subject: RE: Please change FAX number for John Guthrie

To: Monte Reddish, Division of Records and Reporting, Fax
No.
413-7118

From: Gary D. Wimsett, Jr., Senate Committee on Regulated
Industries

Date: January 11, 2000

Re: Case Management System / facsimile number change

As we discussed, please amend the Case Management System to reflect the proper facsimile number for John Guthrie, Staff Director, Senate Regulated Industries: 487-5868. The number you have on file, 487-5925, is incorrect. Please email me at wimsett.gary@leg.state.fl.us once this correction has been made. Thank you for your assistance in this matter.

-----Original Message-----

From: Monte Reddish [mailto:MReddish@PSC.STATE.FL.US]
Sent: Thursday, January 13, 2000 3:14 PM
To: 'WIMSETT.GARY'
Subject: RE: Please change FAX number for John Guthrie

Thank you Gary for the e-mail, but you did not put the fax number.

-----Original Message-----

From: WIMSETT.GARY [mailto:WIMSETT.GARY@leg.state.fl.us]
Sent: Thursday, January 13, 2000 2:29 PM
To: 'mreddish@psc.state.fl.us'
Subject: FW: Please change FAX number for John Guthrie

> -----Original Message-----

> **From:** GUTHRIE.JOHN
> **Sent:** Tuesday, January 11, 2000 6:14 PM
> **To:** WIMSETT.GARY
> **Subject:** FW: Please change FAX number for John Guthrie

>
>
>

> -----Original Message-----

> **From:** GUTHRIE.JOHN
> **Sent:** Tuesday, January 11, 2000 5:42 PM
> **To:** 'Monte Reddish'
> **Subject:** Please change FAX number for John Guthrie

>
> <<C:\WINDOWS\TEMP\PSCFAX.WPD>>

960786

~~960786~~

960100

intermedia

COMMUNICATIONS

January 21, 2000

Via Fax #850-413-7113
Attn: Nonnye Grant
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850


Dear Ms. Grant:

Effective immediately, please change the commission records to indicate the new official contact person for Intermedia Communications. The old contact person was Steve Brown. The new contact person is:

Scott Sapperstein
3625 Queen Palm Drive
Tampa, FL 33619-1309
Phone: 813-829-4093
Fax: 813-829-4923
Email: sasapperstein@intermedia.com

I would appreciate a call or letter when the update is complete. Thank you for your assistance in this matter.

Very Truly Yours,


Scott Sapperstein
Senior Policy Counsel

SAS/af

Done 1/24/00

920260 981834
960100 990546
960786 990649
960833 991534
971478 991854
980495
980986
~~980986~~

~~9874~~ 760786
~~987444~~



Marcie
48 7-1383

Florida House of Representatives
John Thrasher, Speaker
COMMITTEE ON UTILITIES AND COMMUNICATIONS
CONSUMER AFFAIRS COUNCIL

Luis E. Rojas
Chair

Josephus Eggelation
Vice Chair

FAX TRANSMISSION COVER SHEET

TO: Monte

FROM: Utilities/Communications -

RE: New Address info

PAGES: ; including cover sheet 1

DATE: 3/8/00

Bill Tudor was previous

New info: "Booter" Imhoff - Staff Director
430 House Office Building
Tall., FL 32399



Public Service Commission

State of Florida

-M-E-M-O-R-A-N-D-U-M-

DATE: March, 16, 2000
TO: Blanca Bayó, Director, Records and Reporting
FROM: Jane Faurot, Chief, Bureau of Reporting
RE: DOCKET NO. ~~9914442-EG~~, AGENDA ITEM NO. 17 OF 2-29-00 AGENDA
CONFERENCE. 981444

RE: NUMBER UTILIZATION STUDY INVESTIGATION INTO NUMBER
CONSERVATION MEASURES.

DOCUMENT NO: 03295, 3-15-00

The transcript for the above proceedings has been completed and is forwarded for placement in the docket file, including attachments.

Please note that Staff distribution of this transcript was made to:

LEGAL, AFAD, CMU

Acknowledged by:

JK

JK/pc

PSC/RAR 28 (Rev7/94)

M E M O R A N D U M

RECEIVED FASC

March 28, 2000 00 MAR 28 PM 2:02

RECORDS AND
REPORTING

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF LEGAL SERVICES (CALDWELL) *WCAK*

RE: Docket No. 981444-TP - Number Utilization Study: Investigation into Number Conservation Measures

Attached is a notice to be issued in the above-referenced docket. (Number of pages in notice - 1)

DWC
Attachment
cc: Division of Communications (Ileri, Cutting)
I:\981444no.dwc

Self-mailed
1776

DOCUMENT NO.

D5539-06

Hong Wang

From: Kay Flynn
Sent: Wednesday, April 05, 2000 1:54 PM
To: Levent Ileri
Cc: Hong Wang
Subject: RE: Number Pooling

Your e-mail will be sufficient for having her name added to the mailing list in this docket. Hong will take care of it! Kay

-----Original Message-----

From: Levent Ileri
Sent: Wednesday, April 05, 2000 1:51 PM
To: Kay Flynn
Cc: Paul Lowery; Ruth McHargue; Rick Moses
Subject: RE: Number Pooling

Hi Kay,

I just talked with Ms. Lawrence and she said that she does not get our mailings since Dana Shafer who is the representative for Next Link corp. appears to be not sending the info to her, since she says that she is the Numbering Administration Manager for Next Link.

So, please add her name and address as the interested person to Docket No. 981444. If you prefer that I write a memo, please let me know.

Her contact info is as follows:

Dawn Lawrence
drlawrence@nextlink.com
(972)578-6412 -w
2700 Summit Ave
Plano, TX 75075

Thanks,

Levent Ileri

-----Original Message-----

From: Levent Ileri
Sent: Wednesday, April 05, 2000 1:45 PM
To: Rick Moses
Cc: Paul Lowery; Ruth McHargue
Subject: RE: Number Pooling

All ILECs, IXC's, and ALECs which are currently licensed to operate in Florida are party to this docket automatically (by default). If this individual wants to get copies of our records in DN 981444-TL, he should contact the RAR. I will send him a separate e-mail.

-----Original Message-----

From: Rick Moses
Sent: Wednesday, April 05, 2000 1:37 PM
To: Paul Lowery; Levent Ileri
Subject: RE: Number Pooling

Levent, can you help him?

-----Original Message-----

From: Paul Lowery
Sent: Wednesday, April 05, 2000 9:24 AM

To: Rick Moses
Cc: Paul Lowery
Subject: FW: Number Pooling

Do you happen to know who may be able to assist this individual? Thanks!

-----Original Message-----

From: Ruth McHargue
Sent: Wednesday, April 05, 2000 9:12 AM
To: Paul Lowery
Subject: FW: Number Pooling

Paul, please review. Thanks

-----Original Message-----

From: Angie Hashisho
Sent: Wednesday, April 05, 2000 7:49 AM
To: Ruth McHargue
Cc: Angie Hashisho
Subject: FW: Number Pooling

-----Original Message-----

From: drlawrence@nextlink.com [mailto:drlawrence@nextlink.com]
Sent: Tuesday, April 04, 2000 3:01 PM
To: contact@psc.state.fl.us
Subject: Number Pooling

Please add my name to the distribution list for Number Pooling in Florida.

I am with NEXTLINK, a CLEC in FL.

If you have any questions, please let me know.

Dawn Lawrence
drlawrence@nextlink.com
(972) 578-6412 -w
2700 Summit Ave
Plano, TX 75075

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 4/19/00

TO: SELF / MESSER

FROM: M. SANDERS, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No.

981444-TP

or (if filed in an undocketed matter) concerning

Responses Data Request UNUSGO/NXXs, and filed on behalf of
AT & T

The document will
be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (3/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 4-28-00

TO: Benjamin Dickens, Jr.

FROM: Marguerite Lockard Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No.

981444-TP or (if filed in an undocketed matter) concerning _____

number utilization data, and filed on behalf of

Omnipoint. The document will

be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (3/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us



Public Service Commission

State of Florida

-M-E-M-O-R-A-N-D-U-M-

DATE: May 11, 2000
TO: Blanca Bayó, Director, Records and Reporting
FROM: Jane Faurot, Chief, Bureau of Reporting
RE: DOCKET NO. 981444-TP, SPECIAL AGENDA CONFERENCE
HELD 5-5-2000

RE: NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER
CONSERVATION MEASURES.

DOCUMENT NO. 05858, 5-11-00

The transcript for the above proceedings has been completed and is forwarded for placement in the docket file, including attachments.

Please note that Staff distribution of this transcript was made to:

LEGAL, AFAD, CMU

Acknowledged BY:

JF/pc

PSC/RAR 28 (Rev1/00)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770

Public Service Commission

May 24, 2000

(CERTIFIED MAIL NO. 00-206)

Brian Musselwhite, Regulatory Manager
ITC DeltaCom
4092 South Memorial Parkway
Huntsville, Alabama 35802

Re: Return of Confidential Document(s) to the Source

98-1444 TP

Dear Mr. Musselwhite:

The enclosed copy of Document No. 05575-00, filed on behalf of ITC DeltaCom, is being returned to you per your May 8, 2000 telephonic request.

Please do not hesitate to contact me if you have any questions concerning this matter.

Sincerely,

Kay Flynn

Kay Flynn, Chief
Bureau of Records

Enclosure

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BRIAN MUSSELWHITE REGULATORY MANAGER
ITC DELTACOM
4092 S MEMORIAL PKWY
HUNTSVILLE AL 35802

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) *Lucy Loftis* B. Date of Delivery *5/30*
- C. Signature *Lucy Loftis* ☐ Agent ☒ Addressee
- D. Is delivery address different from item 1? ☐ Yes ☒ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

CAPITAL CIRCLE OFFICE C

PSC Website: <http://www.floridapsc.com>

2. Article Number (Copy from service label)

00-206

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

Hong Wang

From: Beth Keating
Sent: Wednesday, May 24, 2000 10:08 AM
To: Hong Wang
Subject: RE: 990455, 990456, 990457, 990517, 981444

Sorry, I was out yesterday.

The name of Lockheed Martin IMS should be changed to NeuStar for purposes of these dockets. The same address and counsel apply. Only the name of the company has changed.

-----Original Message-----

From: Hong Wang
Sent: Wednesday, May 24, 2000 9:33 AM
To: Beth Keating
Subject: 990455, 990456, 990457, 990517, 981444

Beth, as we discussed on Monday, would you please send me an e-mail on changing Lockheed Martin IMS to NeuStar, Inc. in these dockets, so I can have a record in the files. Thank you so much!!

Hong Wang

To: Levent Ileri
Subject: RE: meeting next week

Levent, I have added her in CMS.

-----Original Message-----

From: Levent Ileri
Sent: Friday, June 09, 2000 9:20 AM
To: Hong Wang
Cc: 'Amy Putnam'
Subject: RE: meeting next week

Hi Hong,

Could you please add Amy Putnam's name to the service list for Docket No. 981444 TL? Thank you.

Levent Ileri

-----Original Message-----

From: Amy Putnam [mailto:amy.putnam@neustar.com]
Sent: Friday, June 09, 2000 9:11 AM
To: 'Levent Ileri'
Subject: RE: meeting next week

OK, thanks -- but when did it issue? Would it be possible to put me on the service list for any such orders?

Amy L. Putnam
NeuStar
32519 North Fourth Street
Harrisburg, PA 17110

*per conversation w/ mr. Putnam re: returned mail.
8/17/00.*

I would really appreciate it! Thanks.

-----Original Message-----

From: Levent Ileri [mailto:LILERI@PSC.STATE.FL.US]
Sent: Friday, June 09, 2000 9:07 AM
To: 'Amy Putnam'
Subject: RE: meeting next week

I just talked with Brent. He will be calling you regarding this. The order indicated that the meeting will take place on June 12.

-----Original Message-----

From: Amy Putnam [mailto:amy.putnam@neustar.com]
Sent: Friday, June 09, 2000 8:46 AM
To: 'Levent Ileri'
Subject: meeting next week

Levent, could you please send me a copy of the Order scheduling a first implementation meeting for next week? Thanks.

Amy Putnam
NeuStar, Inc.
717.232.5533

Hong Wang

From: Levent Ileri
Sent: Monday, June 19, 2000 7:42 AM
To: Hong Wang
Subject: RE: Florida Pooling

Thank you Hong.

-----Original Message-----

From: Hong Wang
Sent: Friday, June 16, 2000 5:33 PM
To: Levent Ileri
Subject: RE: Florida Pooling

Levent, I have entered her information in CMS.

-----Original Message-----

From: Levent Ileri
Sent: Friday, June 16, 2000 12:57 PM
To: Hong Wang
Cc: 'Maggie Lee'
Subject: RE: Florida Pooling

Hong,

Could you please add Ms. Maggie Lee's name to our 981444-TP distribution list?

Thank you,

Levent Ileri

-----Original Message-----

From: Maggie Lee [mailto:MLee@illuminet.com]
Sent: Friday, June 16, 2000 12:07 PM
To: LILERI@PSC.STATE.FL.US
Subject: Florida Pooling

I wonder if you would be so kind as to add me to your distribution list for pooling. I represent a Service Bureau for Number Portability with many customers in the state of Florida and am very interested in the pooling activities in order to be compliant for our customers.

Thanks

Maggie Lee
LNP - Senior Technical Analyst
Illuminet
913 814-6229
913 814-6501 fax

7400 w. 129th St.
Overland Park, KS 66213
mlee@illuminet.com

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

00 JUN 27 PM 2:47

RECEIVED-PPSC

DATE: June 27, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Party Received in
Docket No. 981444-TP

This office has received the attached correspondence of Peggy Arvanitas, dated May 22, 2000. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the following letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.

Melinda Butler

From: peggy arvanitas [pegremax2000@yahoo.com]
Sent: Monday, May 22, 2000 2:46 PM
To: jacobs@psc.state.fl.us
Cc: pegremax2000@yahoo.com
Subject: section 251-"competitive neutrality"

Dear Commissioner Jacobs,

I have heard from two CLEC's in the 904,954,561 area code that are losing business , as well as money, because of the lottery (6 NXX's per month) in those jeopardy relief areas for the next 9 months.

If numbers were released now, in 1000 block, then 60 1000 blocks would be released, and every code holder would have some numbers now that want to compete in those regions.

Please read the May 15 FCC 99-200 filing of the Office of Consumer advocates... The "BIG 10" state Office of Public Councils got together and did a joint filing. Under the heading discussing FCC charging for numbers, they discuss a NORTEL (equipment manufacturer)

study that says all carries, LNP capable, and NON-LNP capable, can receive numbers in 1000 block. The changes would be how they would be identified in the LERG, the monthly subscription service that defines the routing information for all the numbers.

Although this violation of chapter 251 1996 Telecom act not "competitively neutral" situation with the 954,904, 561 Florida lottery issuance will not be addressed in the PSC order, and was not a part of the docket, I have to call someone's attention to it. The company feels their representatives were so engrossed with banding for 3.0, that they failed to concern themselves with CLEC interests.

Where do I tell these owners to file, PSC or FCC?
Peggy Arvanitas the RE/MAX realtor on the last two dockets

Do You Yahoo!?

Send instant messages & get email alerts with Yahoo! Messenger.
<http://im.yahoo.com/>

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: August 2, 2000
TO: Parties of Record and Interested Persons in Dockets 981444-TP, 960100-TP, 990321-TP, and 981834-TP
FROM: Blanca S. Bayó, Director, Division of Records & Reporting BSB/kf
RE: Contact Regarding Employment

Section 5.02 B.1.c. of the Commission's Administrative Procedures Manual requires the notification of all parties and interested persons in affected dockets if a staff member involved in any of those dockets indicates that he or she has been approached regarding employment by a party in the dockets.

As a party or interested person in the dockets referenced above, you are hereby notified that Levent Ileri, Engineer IV in the Commission's Division of Competitive Services, has advised the Commission that he was contacted by Supra Telecommunications regarding employment.

BSB:kf

cc: William D. Talbott
Mary A. Bane
James A. Ward
Catherine Bedell
Walter D'Haeseleer
Sally Simmons
Levent Ileri

Kay Flynn

To: Cheryl Bulecza-Banks; Walter D'Haeseleer
Cc: Levent Ileri; Blanca Bayo
Subject: RE: Levent Ileri

Thank you. I'll send notice to all parties in those dockets concerning this matter, in accordance with the APM.

-----Original Message-----

From: Cheryl Bulecza-Banks
Sent: Monday, July 31, 2000 10:58 AM
To: Walter D'Haeseleer
Cc: Kay Flynn; Levent Ileri
Subject: RE: Levent Ileri

Yes. He has e-mailed Legal and he is going to be revising the CASRs to remove his name from the applicable dockets. The dockets include: 981444 - Number Utilization Study

960100- Number Portability
990321 - Collocation Issues
981834 - Collocation Issues

-----Original Message-----

From: Walter D'Haeseleer
Sent: Monday, July 31, 2000 10:47 AM
To: Cheryl Bulecza-Banks
Subject: FW: Levent Ileri

Is he?

-----Original Message-----

From: Kay Flynn
Sent: Monday, July 31, 2000 9:55 AM
To: Walter D'Haeseleer
Cc: Blanca Bayo
Subject: Levent Ileri

Good morning. I'm following up on Levent's notice to Mr. T. advising he was approached by Supra concerning employment. Is Levent involved in any docketed or undocketed matters relating to Supra?

Kay



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

00 JUL 24 AM 11:51

RECEIVED-FPSC

DATE : July 24, 2000
TO : William Talbott, Executive Director
FROM : Levent Ileri, Division of Competitive Services *ji*
RE : Reporting Requirement

Pursuant to the Commission's Reporting Requirement in Section 5.02 B(1), I am informing you that I was approached by Supra Telecommunications on July 22, 2000.

cc: Walter D'Haeseleer
Sally Simmons
Cheryl Bulecza-Banks

note: When he hand delivered this Levent told us verbally that he had talked to them and signed confidentiality agreement. It would appear that recruiting activities are in progress.

A handwritten signature, likely of Walter D'Haeseleer, consisting of stylized initials.

7/24/00

Walter:

Levent Ileri should be prohibited from working on and/or "supervising" matters, docketed or undocketed, relating to Supra Telecommunications.

Please get with Levent and identify any dockets that he is participating in and to which this prospective employer or affiliated company is a party, and request that Records and Reporting notify all interested parties in those dockets.

c: Mr. Paul Nichols, Chief of Personnel
Dr. Mary Bane, Deputy Executive Director/Technical
Mr. James Ward, Deputy Executive Director/Adm.
Mr. Jack Shreve, Public Counsel
Ms. Blanca Bayò, Director of Records & Reporting
Mr. Levent Ileri

A handwritten signature, likely of Bill, consisting of stylized initials.

STATE OF FLORIDA

Commissioners:

J. TERRY DEASON, Chairman
SIR
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 8/18/06

TO: GOGGIN / BELL SOUTH

FROM: M. SANDERS, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

10123-00

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

981444-TP or (if filed in an undocketed matter) concerning _____

ATTACHMENT 1, and filed on behalf of _____

BELL SOUTH. The document will

be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (3/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECEIVED FPSC
00 AUG - 4 PM 4:14
RECORDS AND
REPORTING

DATE: August 3, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Party Received in
Docket No. 981444

This office has received the letter from Peggy Arvanitas dated July 6, 2000. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.

RE/MAX

*Above
the
Crowd!*

RECEIVED

JUL 12 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs



Peggy Arvanitas

July 6, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: EX PARTE CONVERSATION WITH YOG VARMA, DEPUTY CHIEF
COMMON CARRIER BUREAU, ON DOCKET FCC 99-200

DEAR Ms. Salas,

Pursuant to Section 1.1206(b)(2) of the FCC rules, I, Peggy Arvanitas submit for filing this notice of the ex parte communication with Yog Varma on June 15, 2000. The details of the meeting and the summary are listed below.

The initial concern was the June 2, 2000 ex parte filing of California Public Service Commission senior staff counsel, Helen Mickiewicz. Her concern was that, in the 310 area code that they had ordered the LEC's to do number pooling could not occur as scheduled. The reason being, one of the LEC's was NOT LNP CAPABLE. And, in her own words, "could not engage in number pooling." She asked the FCC to "allow state commissions to make a bonified request of those wireline carriers to have them implement LNP so that those carriers can begin number pooling."

I told Yog Varma, if that 310 area code is Los Angeles, it is already in the top 100 MSA's and therefore, those carriers that are not LNP capable are in violation of FCC 95-116 third order, May 1998. That filing gave specific deployment dates. Top 5 cities, (Los Angeles being one of them) should have been LNP capable as of May 1998. Other top 100 MSA's needed to be LNP (local number portability) capable by December 30, 1998. And outside of the top 100 MSA's that did not require LNP capability, only when a CLEC asked, and then there was a 4-6 month time frame.

RE/MAX First Class
620 Bypass Drive
Clearwater, Florida 33764
Office: (727) 797-7500
E-Mail: pegremax2000@yahoo.com
Each Office Independently Owned and Operated

I told Yog Varma that we had this similar problem with understanding deployment dates from my Florida PSC docket 981444TP. I had a very heated argument with two BellSouth employees, Stan Greer and Doug McCullough on our docket in Feb. 2000. It was a very racy screaming match with them saying they "needed to know what areas Florida PSC would want them to do number pooling in, to make sure we are LNP capable." Of course, on that Florida teleconference call, I chimed in that they had better be LNP capable in Dade/Miami/ Broward/ Jacksonville area. Not only were they top 100 MSA areas, but these were areas where Bellsouth was, since July 1999, charging for "portability" on end user phone bills. This was a federal tariff they filed, and if Bellsouth was not LNP capable in Florida, then they should have asked for a variance for Florida and not charged \$10-\$20 million minimum that year, in 3 top Florida MSA's. Finally, I told Yog Varma, the argument ended when Stan Greer, Bellsouth, at the next tele-conference call, started reciting from the 95-116 FIRST ORDER. I asked what year, and he said "1997". And I said, "well, I have third order, May 1998." At which point the Bellsouth representatives were MUTE the rest of the meeting. Office of Public Counsel, Charlie Beck, and Levent Ileri, PSC of Florida were witnesses to that meeting.

My concern to Yog Varma is the ignorance of even major telecom companies, and no check and balance, only a carrier's certification for federal tariffs. I said, I had talked to 3-4 CLEC's smaller companies in Florida, and both GTE and Bellsouth area CLEC's were saying, in top 100 MSA cities in Florida, that the ILEC's were either taking 4-6 months, or REFUSING TO PORT AT ALL BY SAYING THAT THEIR RATE CENTERS WERE OUTSIDE OF THE COUNTY AND THE CUSTOMERS WOULD NEED NEW NUMBERS.

Yog was concerned, and said it was up to the CLEC's to know the rules for portability. I said that if the ILEC's were still reading old orders, and the CLEC's being small and not having the money for a \$50,000 plus FCC/ PSC of Florida attorney to continually keep up on new FCC orders, who's to blame? I told Yog Varma that it was HIS job, as Common Carrier Bureau deputy chief, to be the referee and make sure all the players are playing by the rules. The customers don't even know the rules for portability. He said they could do a complaint, and I reminded him INC Number portability guidelines say complaints go to the NANC, and they NANC maybe would file it 60 days later with the CCB. The INC/ NANC rules are sometimes in violation of procedures issued by the FCC. Then Yog said those infamous words..... in the top 100 MSA's.....

Yog Varma: Well, if a CLEC makes a written demand to an ILEC to port numbers, then as per the INC guidelines, the ILEC has 72 HOURS TO PORT THE NUMBERS TO THE CLEC. And I said, some of the CLEC's were told, as per the ILEC or the NANC, that only so many numbers can get ported per carrier, per NPA. I did not know if it was because of the LERG or whatever. Then I said to Yog Varma, well the LERG has a port column, and the CLEC's get the subscription from Telecordia to know how long they should wait to get a business ported number. If the column has Y, then it should be less than a month, but if it had N for no, then it could take 4-6 months. Regardless of the fact that that NPA was in the top 100 MSA's and they should be LNP capable. Then YOG said,

YOG: well, I had been told that the LERG was sometimes outdated information and could not be reliable.

Then I said, well, they don't say that when they sell the subscription service to the ILEC's and CLEC's. I had filed FCC 98-184 Feb 14, 2000, challenging GTE /Bell Atlantic's merger on the grounds they were not LNP capable in Sarasota. Bradenton areas, as of Dec 1999, and that was a top 100 MSA. And they just denied it like the info in the LERG did not exist.

I did come to the conclusion that small CLEC's are getting shafted, even though they have fiber optic/ new wiring. The Tampa Bay area ILEC has older copper wiring, and were slow to deploy upgrades because of their Local 824 Union negotiations, and them shutting maintenance down 50% while they were out of contract. I hope that the FCC takes a more active role in ENFORCEMENT so that the small guy can make money.

I did thank Yog Varma for what was a very racy 22 minutes of conversation, even though I felt he should be a "bigger brother" to the CLEC's. And, I also apologized for calling him "Yogi" three times.

Thank-you for making this a part of my record. I am[^] sorry that the Records and Reporting could not find my filing I mailed in from last month, but this time I will be sending it Airborne.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peggy Arvanitas".

Peggy Arvanitas
"representing myself"



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

00 AUG - 1, PM 4:14

RECEIVED-FPSC

DATE: August 3, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Party Received in
Docket No. 981444

This office has received the letter and attachment from Peggy Arvanitas dated July 6, 2000. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.



N A R U C
National Association of Regulatory Utility Commissioners

June 2, 2000

RECEIVED

JUN - 8 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas,
FCC Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

FCC ex parte
from NARUC -
these are the
state revisions
the FCC 00-104
order demanded
be inserted with
the number pooling
guidelines.

RE: Ex Parte - Two Copies filed in the Proceedings Captioned:

In the Matter of Number Resource Optimization Docket; Connecticut DPUC Petition for Rulemaking to Amend the Commission's Rule Prohibiting Technology-Specific or Service-Specific Area Code Overlays; Massachusetts DTE Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes; California PUC and the People of the State of California Petition for Waiver to Implement a Technology-Specific or Service-Specific Area Code, CC Docket 99-200, RM 9258; NSD File No. L-99-17; NSD File No. L-99-36, FCC 99-122 (rel. June 3, 1999)

In the Matter of Petition of the Oregon Public Utility Commission For Expedited Delegation Of Authority To Implement Number Conservation Measures; NSD File No. L-00-29, 2000 FCC LEXIS 2562, (rel May 18, 2000);

In The Matter Of Petition Of The Public Service Commission Of Kentucky's For Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-00-08, 15 FCC Rcd 5054; 2000 FCC LEXIS 1295, (rel. March 15, 2000);

In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, 2000 FCC LEXIS 1691, (rel. March 31, 2000);

In The Matter Of the Colorado PUC's Petition For Delegation Of Additional Authority To Implement Number Resource Optimization Measures; NSD File No. L-00-16, 2000 FCC LEXIS 650, (rel. Feb 16, 2000)

In the Matter of the Arizona Corporation Commissions Petition for Delegation of Additional Authority to Implement Number Resource Optimization Measures; NSD File No. L-99-100, 2000 FCC LEXIS 622, (rel. Feb 14, 2000)

In the Matter of the Pennsylvania PUC's Petition For Delegation Of Additional Authority To Implement Number Conservation Measures; NSD File No. L-99-101, 2000 FCC LEXIS 623 (rel. Feb 14, 2000)

In the Matter of the Washington Utilities and Transportation Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-102, 2000 FCC LEXIS 795, (rel. Jan 31, 2000)

In the Matter of the Georgia PSC's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-98, 1999 FCC LEXIS 6414, (rel. Dec 20, 1999)

In the Matter of the Tennessee Regulatory Authority's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-94, 1999 FCC LEXIS 6415, (rel Dec 20, 1999)

No. of Copies rec'd 0+0
List A B C D E

Mailed

In the Matter of the North Carolina Utilities Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-97, 1999 FCC LEXIS 6416, (rel. Dec 20, 1999).

In the Matter of the Virginia State Corporation Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-95, 1999 FCC LEXIS 6417, (rel. Dec 20, 1999).

In the Matter of the Utah Public Service Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-89, 1999 FCC LEXIS 6063, (rel. Dec 1, 1999)

In the Matter of the Missouri Public Service Commission's Petition For Delegation Of Additional Authority To Implement Number Conservation Measures for the 314, 417, 573, 636, 660, and 816 area codes; NSD File No. L-99-90, 1999 FCC LEXIS 6064, (rel. Dec 1, 1999).

In the Matter of Petition of the Nebraska Public Service Commission's Petition Delegation of Additional Authority to Implement Number Conservation Measures for the 402 Area Code; NSD File No. L-99-83, 14 FCC Rcd 18672; 1999 FCC LEXIS 5593, (rel. Nov 4, 1999).

In the Matter of Petition of the Indiana Utility Regulatory Commission's Petition Delegation of Additional Authority to Implement Number Conservation Measures; NSD File No. L-99-82, 14 FCC Rcd 18674; 1999 FCC LEXIS 5594, (rel. Nov 4, 1999).

Dear Ms. Salas:

On May 31, 2000, two Commissioners appointed to the North American Numbering Council (NANC) by the National Association of Regulatory Utility Commissioners (NARUC), *Commissioner Jack Goldberg* of the Connecticut DPUC and *Commissioner Thomas Dunleavy* of the New York Public Service Commission, joined by NARUC's General Counsel, Brad Ramsay had a number of meetings at the FCC to discuss NANC activities and related numbering issues.

NARUC appreciates how closely the FCC and its staff has continued to work closely with the States on numbering issues. Our March 8th resolution specifically extends the entire association's "appreciation to the FCC and its staff for working closely with the States on the first set of State delegation orders and the critical issues raised by the NPRM." There is, however, much more work to be done. Commissioners Dunleavy and Goldberg, joined by Mr. Ramsay, met with the following FCC representatives to discuss outstanding issues:

10:00	Meeting With Commissioner Furchugott-Roth and Rebecca Benyon.
11:00	Meeting with Commissioner Ness and Jordan Goldstein.
12:00	Meeting with Yog Varma, Diane Harmon, Chuck Needy and Jared Carlson.
1:30	Meeting with Commissioner Tristani and Sarah Whitesell.
2:40	Meeting with Chairman Kennard and Dorothy Attwood.
3:30	Meeting with Commissioner Powell and Kyle Dixon.

II. THE DISCUSSIONS IN EACH OFFICE FOCUSED ON THE FOLLOWING THEMES:

***Important Note – Commissioners Dunleavy and Goldberg discussed both concerns on behalf of their own state commissions and as members of NANC and also supported NARUC positions. Most of their concerns are consistent with NARUC adopted positions. Nevertheless, I've specified if NARUC has a resolution position specifically on point on each of the themes discussed.

A. *FCC Should Immediately Grant All Pending State Petitions (NARUC Position)*

THE CLOCK IS RUNNING DOWN IN MANY AREA CODES AND THE STATES' NEED FOR AUTHORITY TO TAKE ACTION SIMPLY CANNOT BE POSTPONED. The rapid proliferation of States that have been pressured by circumstances to seek emergency numbering conservation authority from the FCC, highlight the need for rapid FCC action. Since the FCC granted the first 10 State petitions, *17 more States have filed requests seeking similar relief.* Implementation of the March Order is going to take time. There is no time left. Accordingly, the FCC should grant the remaining outstanding state petitions as a group in a single order as soon as possible.

B. *FCC Should Move as Quickly as Possible on the FNPRM (NARUC Position)*

✱ **NUMBER UTILIZATION RATES:** The FCC needs to move quickly to set a utilization rate for non-pooling carriers that: (1) compels efficient numbering practices; (2) provides carriers with timely access to numbering resources for which they have demonstrated a proven need; and (3) comports with state experience in the rate of number utilization. NARUC has not yet taken a position on a specific fill rate, but discussions with member commissions suggests immediate adoption of a 75% utilization rate with an increase to an 80-85% range within the next two years will met all these objectives. A 75% utilization rate will minimize the number of stranded resources and encourage more efficient numbering practices. Maine, California, Massachusetts, New Hampshire, and New York have already adopted a 75% fill rate for all carriers. These discussions have also suggested that fill rates should apply to ALL carriers – including "poolers."

DEADLINE FOR WIRELESS POOLING SHOULD NOT BE EXTENDED UNDER ANY CIRCUMSTANCES: The FCC should continue to require wireless carrier participation in pooling by November 24, 2002. The wireless industry has had more than sufficient notice of the need to make their systems not only LNP-capable but also pooling-capable. There are two years left before the deadline occurs. Wireless carriers must be given every incentive to devote the necessary resources to accomplish this task; they must not be allowed to continue to delay implementation. Wireless participation could have an enormously positive impact on the effectiveness of pooling.

C. *Clarification of the March Order Needed (NANC Representative Concerns).*

Neustar and Inc. have posed questions about the March Order to the FCC staff that, depending upon how they are interpreted, could significantly undercut States ability to take appropriate action under delegated authority and reduce considerably the efficacy of the FCC's proposed number allocation scheme. Commissioners Goldberg and Dunleavy suggest that rapid public clarification of those questions is needed. The Order was good first step, but it needs to be enforced. Enforcement and the State's ability to employ effective conservation measures are at the core of many of the questions submitted. Regardless of how the order is interpreted, the FCC is the final arbiter of code assignment questions. For that reason, in examining and responding to each of these questions, *the FCC should lean heavily towards giving the affected state commission, whose members are, like their FCC counterparts, charged by statute with protecting the public interest, more flexibility rather than shifting more authority to a third party contractor.* *✱*

D. *FCC Needs to Address the Emerging "E-Fax" Problem and Related outstanding State Requests for Technology Specific Area Code Authority. (NANC Representative Concerns)*

In some states carriers are requesting codes that are not used "in-state" but are assigned to e-faxes – which can cause premature exhaust of codes. One such carrier's request for codes in New Hampshire has moved that state's projected exhaust date up 4 years. Whatever the merits of any proposed pricing mechanism, which could offer a long term solution, will NOT, in any case, provide a "timely" solution. Action is needed now. The States have just begun to discuss this problem. Among the preliminary ideas suggested in these discussions is the possibility of a special area code just for such services. Certainly, in the case of wireless services the time has come to take such a step. New York implemented a service specific code for wireless back in 1991. Connecticut, California, Ohio, and other states have sought authority to implement such codes. The wireless industry, which two years ago was using, e.g., 1 of every 3 numbers allocated in Connecticut, has contributed to the exhaust problem by moving slowly to implement LNP. Carriers in other jurisdictions survive and thrive with specific code assignments, e.g., New York, Australia, etc. Certainly, one of the most powerful industries in the country today – experiencing near 40% growth rates can not be stopped or even slowed by having its own code.

E. *FCC Should Continue to Support Increased State Involvement in NANC Perhaps through Structural Changes or Opening More Slots for State Commissions (NARUC Position)*

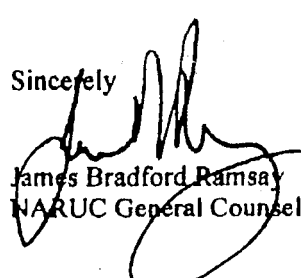
F. *NARUC N11 Guidelines Request (NARUC Position)*

At our March meetings NARUC passed a resolution urging the FCC to immediately develop guidelines for use of all N11 service codes. Specifically, the resolution states that NARUC

- (1) Supports the States' use of 211 to allow *interim*-deployment for social service purposes, but believes the FCC should reserve 211 from any other new assignment until it develops guidelines for N11 codes use;
- (2) Recognizes the FCC may grandfather currently assigned uses of 211 for valid public interest services with universal benefit to continue until it has developed guidelines for the use of all N11 service codes, and
- (3) Urges the FCC to immediately develop guidelines for the use of N11 service codes on a nationwide basis for public services because of increased requests for public interest use and the scarcity of the codes.

NARUC respectfully requests any waivers needed to file this out-of-time. If you have any questions or comments concerning this correspondence, please do not hesitate to contact me at 202.898.2207 or jramsay@naruc.org.

Sincerely


James Bradford Ramsay
NARUC General Counsel

Enclosures

Resolution on the FCC's Number Conservation Rulemaking Proceeding and Pending Delegation Orders

WHEREAS, The current numbering administration process for the North American Numbering Plan has proven to be inadequate and has led to the inefficient use of numbering resources and the premature assignment of new area codes; and

WHEREAS, The FCC has worked closely with the States and acted expeditiously on 10 state requests for additional authority to conserve numbering resources; and

WHEREAS, The FCC is expected to issue an order soon based on comments received in response to its June 2, 1999 Notice of Proposed Rulemaking in the Number Resource Optimization Docket, CC Docket No. 99-200, FCC 99-122 (June 2, 1999); and

WHEREAS, In July, 1999, NARUC passed a resolution outlining critical principles that are essential to the creation of an effective, competitively-neutral, administratively feasible numbering administration system which were filed in this proceeding within two weeks of the resolution's passage; and

WHEREAS, On January 20, 2000, a group of States met with the FCC to discuss numbering issues and subsequently filed proposed revisions to the "*Industry Numbering Committee (INC) Thousand Block (NXX-X) Pooling Administration Guidelines*" which were consistent with, but more specific than NARUC's previous resolution, suggesting, among other things, (1) changing permissive language to mandatory language to reduce carrier options to comply, (2) requiring the Pooling Administrator to include states in a decision-making process with the industry, instead of allowing decisions just by industry consensus, (3) changing the 9 month inventory to 6 months and the 6 month jeopardy inventory to a 3 months, (4) requiring quarterly forecasts instead of annual (and clarifying that States can require them less frequently under appropriate circumstances), and (5) requiring the pooling administrator to review carrier forecasts for reasonableness before sizing the individual pools.

WHEREAS, The group of States also made specific presentations on related issues, an outline of that presentation is appended to this resolution, that again were generally consistent with NARUC's original resolution, but added additional detail and reached some issues not addressed in NARUC's July comments; *now therefore be it*

RESOLVED, That the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened in its 2000 Winter Meetings in Washington, D.C., that NARUC extends its appreciation to the FCC and its staff for working closely with the States on the first set of State delegation orders and the critical issues raised by the NPRM; *and be it further*

RESOLVED, That NARUC supports the specific revisions to the INC Guidelines described above and the additional proposals described in the attached addendum which were presented during the January 20, 2000 meetings between State staffs and the FCC, and urges the FCC to adopt these proposals; *and be it further*

RESOLVED, That NARUC urges the FCC to act this month on the NPRM, and failing that to respond as quickly as possible to outstanding State requests for additional authority to impose numbering conservation measures; *and be it further*

RESOLVED, That NARUC counsel is directed to file comments consistent with this resolution with the FCC.

*Sponsored by the Committee on Telecommunications
Adopted by the NARUC Board of Directors March 8, 2000*

ADDENDUM TO MARCH 2000 NUMBERING RESOLUTION
OUTLINE OF POSITIONS PRESENTED BY STAFF FROM 17+ STATES DURING THE JANUARY 20, 2000
MEETING WITH THE FCC

I. CORE POSITIONS

- A. Unnecessary area code relief must be stopped through adoption of enforceable number conservation measures.
- B. Industry must be made accountable for use of public resources through mandatory compliance with specific rules and reporting requirements.
- C. States and NANPA need enforcement authority and states need the ability to participate in policy decisions relating to the implementation of conservation measures

II. ADDITIONAL REQUIREMENTS RELATED TO POOLING

- AP* A. **FILL RATES:** Support the use of fill rates in tandem with a requirement that carriers show that resources will exhaust within 6 months.
- SB* B. **FACILITIES READINESS:** Support requirement that carriers show readiness to provide service before numbers are allocated
- C. **ACCURATE FORECASTING AT RATE CENTER LEVEL:** Support requiring accurate forecasting to allow states to make reasonable relief and pooling decisions and force carriers to be more accountable.
- AD* D. **PROVISION OF UTILIZATION DATA AT RATE CENTER LEVEL:** This data is key to ensuring accountability; it provides states and NANPA with data necessary to reclaim unused codes and ensure carrier compliance with guidelines and state conservation orders.
- E. **SEQUENTIAL NUMBERING:** Requires carriers to preserve uncontaminated thousands blocks until pooling begins to gain maximum benefits from pooling.
- F. **AUDITING/COMPLIANCE AUTHORITY TO STATE and NANPA**
 - (1) A neutral third-party, such as NANPA or a state commission, should conduct audits; states should not be required to conduct the audits but should be allowed to do so if resources permit. Auditing will be an important tool for ensuring compliance with the FCC's Order.
 - (2) NANPA needs clear authority and guidance - NANPA will be the front line of enforcement and they need authority to take action against carriers.
 - (3) NANPA needs to work with states - NANPA should feel comfortable meeting states' needs without feeling "disloyal" to industry
- G. **OTHER ISSUES**
 - (1) No prerequisite of rate center consolidation - Rate center consolidation is complex, costly, and time consuming. While it should be considered, it should not be a prerequisite to pooling.
 - ✱* (2) No distinction between urban and rural areas - FCC should not condition the availability of conservation measures on whether an area is in an urban or rural area.
 - (3) No slipping of wireless LNP deadline (11/02) - Wireless participation in pooling is essential for long-term conservation.

III. CARRIER CHOICE OF CONSERVATION MEASURES SHOULD NOT BE ALLOWED

IV. STATE/FEDERAL REVIEW AND APPROVAL OF ANY INDUSTRY-DRAFTED GUIDELINES SHOULD BE REQUIRED IF THE GUIDELINES WILL BE USED BY NANPA TO ADMINISTER NUMBERS. Currently, INC drafts and revises guidelines that are used by industry and NANPA to administer numbers. Neither FCC nor states participate directly nor do they approve the final versions. The Guidelines often have significant impact on numbering policy issues and thus it is important that both states and the FCC participate in the process.

V. STATES SHOULD BE GIVEN AUTHORITY TO ORDER UNASSIGNED NUMBER PORTABILITY (UNP) WHEN STATE SPECIFIC CIRCUMSTANCES WARRANT. The porting between carriers of Telephone Numbers that are yet unassigned to customers (i.e., unassigned number porting or UNP) is one resource management tool that could preclude the need for a carrier to obtain larger, and potentially unused, blocks of numbering resources directly from the NANPA. Therefore, granting the states the authority to order UNP, when state specific circumstances warrant, is clearly in the public interest.



Peggy Arvanitas

July 6, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: EX PARTE CONVERSATION WITH YOG VARMA, DEPUTY CHIEF
COMMON CARRIER BUREAU, ON DOCKET FCC 99-200

DEAR Ms. Salas,

Pursuant to Section 1.1206(b)(2) of the FCC rules, I, Peggy Arvanitas submit for filing this notice of the ex parte communication with Yog Varma on June 15, 2000. The details of the meeting and the summary are listed below.

The initial concern was the June 2, 2000 ex parte filing of California Public Service Commission senior staff counsel, Helen Mickiewicz. Her concern was that, in the 310 area code that they had ordered the LEC's to do number pooling could not occur as scheduled. The reason being, one of the LEC's was NOT LNP CAPABLE. And, in her own words, "could not engage in number pooling." She asked the FCC to "allow state commissions to make a bonified request of those wireline carriers to have them implement LNP so that those carriers can begin number pooling."

I told Yog Varma, if that 310 area code is Los Angeles, it is already in the top 100 MSA's and therefore, those carriers that are not LNP capable are in violation of FCC 95-116 third order, May 1998. That filing gave specific deployment dates. Top 5 cities, (Los Angeles being one of them) should have been LNP capable as of May 1998. Other top 100 MSA's needed to be LNP (local number portability) capable by December 30, 1998. And outside of the top 100 MSA's that did not require LNP capability, only when a CLEC asked, and then there was a 4-6 month time frame.

RE/MAX First Class
620 Bypass Drive
Clearwater, Florida 33764
Office: (727) 797-7500
E-Mail: pegremax2000@yahoo.com
Each Office Independently Owned and Operated

I told Yog Varma that we had this similar problem with understanding deployment dates from my Florida PSC docket 981444TP. I had a very heated argument with two BellSouth employees, Stan Greer and Doug McCullough on our docket in Feb. 2000. It was a very racy screaming match with them saying they "needed to know what areas Florida PSC would want them to do number pooling in, to make sure we are LNP capable." Of course, on that Florida teleconference call, I chimed in that they had better be LNP capable in Dade/Miami/ Broward/ Jacksonville area. Not only were they top 100 MSA areas, but these were areas where BellSouth was, since July 1999, charging for "portability" on end user phone bills. This was a federal tariff they filed, and if BellSouth was not LNP capable in Florida, then they should have asked for a variance for Florida and not charged \$10-\$20 million minimum that year, in 3 top Florida MSA's. Finally, I told Yog Varma, the argument ended when Stan Greer, BellSouth, at the next tele-conference call, started reciting from the 95-116 FIRST ORDER. I asked what year, and he said "1997". And I said, "well, I have third order, May 1998." At which point the BellSouth representatives were MUTE the rest of the meeting. Office of Public Counsel, Charlie Beck, and Levent Ileri, PSC of Florida were witnesses to that meeting.

My concern to Yog Varma is the ignorance of even major telecom companies, and no check and balance, only a carrier's certification for federal tariffs. I said, I had talked to 3-4 CLEC's smaller companies in Florida, and both GTE and BellSouth area CLEC's were saying, in top 100 MSA cities in Florida, that the ILEC's were either taking 4-6 months, or REFUSING TO PORT AT ALL BY SAYING THAT THEIR RATE CENTERS WERE OUTSIDE OF THE COUNTY AND THE CUSTOMERS WOULD NEED NEW NUMBERS.

Yog was concerned, and said it was up to the CLEC's to know the rules for portability. I said that if the ILEC's were still reading old orders, and the CLEC's being small and not having the money for a \$50,000 plus FCC/ PSC of Florida attorney to continually keep up on new FCC orders, who's to blame? I told Yog Varma that it was HIS job, as Common Carrier Bureau deputy chief, to be the referee and make sure all the players are playing by the rules. The customers don't even know the rules for portability. He said they could do a complaint, and I reminded him INC Number portability guidelines say complaints go to the NANC, and they NANC maybe would file it 60 days later with the CCB. The INC/ NANC rules are sometimes in violation of procedures issued by the FCC. Then Yog said those infamous words..... in the top 100 MSA's.....

Yog Varma: Well, if a CLEC makes a written demand to an ILEC to port numbers, then as per the INC guidelines, the ILEC has 72 HOURS TO PORT THE NUMBERS TO THE CLEC. And I said, some of the CLEC's were told, as per the ILEC or the NANC, that only so many numbers can get ported per carrier, per NPA. I did not know if it was because of the LERG or whatever. Then I said to Yog Varma, well the LERG has a port column, and the CLEC's get the subscription from Telecordia to know how long they should wait to get a business ported number. If the column has Y, then it should be less than a month, but if it had N for no, then it could take 4-6 months. Regardless of the fact that that NPA was in the top 100 MSA's and they should be LNP capable. Then YOG said.

YOG: well, I had been told that the LERG was sometimes outdated information and could not be reliable.

Then I said, well, they don't say that when they sell the subscription service to the ILEC's and CLEC's. I had filed FCC 98-184 Feb 14, 2000, challenging GTE /Bell Atlantic's merger on the grounds they were not LNP capable in Sarasota. Bradenton areas, as of Dec 1999, and that was a top 100 MSA. And they just denied it like the info in the LERG did not exist.

I did come to the conclusion that small CLEC's are getting shafted, even though they have fiber optic/ new wiring. The Tampa Bay area ILEC has older copper wiring, and were slow to deploy upgrades because of their Local 824 Union negotiations, and them shutting maintenance down 50% while they were out of contract. I hope that the FCC takes a more active role in ENFORCEMENT so that the small guy can make money.

I did thank Yog Varma for what was a very racy 22 minutes of conversation, even though I felt he should be a "bigger brother" to the CLEC's. And, I also apologized for calling him "Yogi" three times.

Thank-you for making this a part of my record. I am sorry that the Records and Reporting could not find my filing I mailed in from last month, but this time I will be sending it Airborne.

Sincerely,

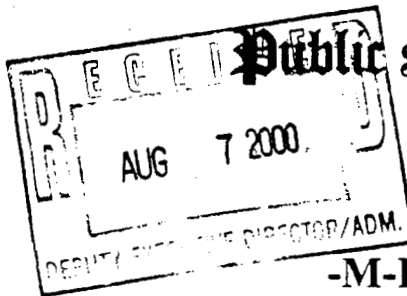
A handwritten signature in cursive script, appearing to read "Peggy Arvanitas".

Peggy Arvanitas
"representing myself"

RECEIVED

JUL 25 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs

**Public Service Commission****-M-E-M-O-R-A-N-D-U-M-**

DATE : August 7, 2000
TO : William Talbott, Executive Director
FROM : Levent Ileri, Division of Competitive Services *xi*
RE : Reporting Requirement

RECEIVED-FPSC
00 AUG - 7 AM 10:53
RECORDS AND
REPORTING

On July 24, 2000, pursuant to the Commission's Reporting Requirement in Section 5.02 B(1), I informed you that I was approached by Supra Telecommunications on July 22, 2000.

Due to my current work load, job responsibilities, and commitments at the Florida Public Service Commission, I notified Supra Telecommunications on August 7, 2000, indicating that I was not pursuing any career opportunities with them. In addition, I declined any further job interview inquiries and job offers that they might have in the future.

Therefore, I respectfully request that I be reassigned to the Dockets 981444-TP, 960100-TP, 990321-TP, and 981834-TP. If you've any questions, please call me at 413-6562.

cc: Mary A. Bane
James A. Ward
Catherine Bedell
Walter G. D'Haeseleer
Beth W. Salak
Sally A. Simmons
Cheryl Bulecza-Banks



Florida House of Representatives
John Thrasher, Speaker
COMMITTEE ON UTILITIES AND COMMUNICATIONS
CONSUMER AFFAIRS COUNCIL

Luis E. Rojas
Chair

Josephus Eggelton
Vice Chair

August 2, 2000

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

960100, 960786, 981444

RECEIVED
AUG - 7 PM 2:42
RECORDS AND
REPORTING

Dear Ms. Bayo:

This is in reference to some of the publications that are provided by the Public Service Commission to the Utilities and Communications Committee.

You have Bill Tabor's name listed in your Docket NO. distribution list. Please remove that name as he has not been with this office for 5 years. I have enclosed a copy that will enable you to easily identify the document.

Additionally, Patrick L. "Booter" Imhof is the Staff Director of the Utilities and Communications Committee. Please reflect that change on all documents that this office receives.

Thank you for your consideration of this request.

Sincerely,

Lynn Koon
Committee Administrative Assistant

right R/R/Booter

Done 8/7/00
960100

Nancy B. White
General Counsel

Legal Department

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

July 28, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 981444-TP (No. Utilization)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Variance of Number Pooling Requirement for 1AESS Switches, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Nancy B. White

Enclosures

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

CERTIFICATE OF SERVICE
Docket No. 981444-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 28th day July, 2000 to the following:

American Network Exchange, Inc.
6 Nevada Drive #C
New Hyde Park, N.Y. 11042-1114

AT&T Communications of the Southern
States, Inc.
Tracy Hatch
Marsha Rule
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Tel: 850-425-6342
Fax: 850-425-6361

AT&T Wireless Services of Florida, Inc.
William Higgins
11760 N. US Hwy. 1, W. Tower 3rd. Fl.
North Palm Beach, FL 33408
Tel: 561-775-4383

Ausley Law Firm
Lee Willis/Jeffry Wahlen
P.O. Box 391
Tallahassee, FL 32302
Tel: 850-224-9115
Fax: 850-222-7952

Beard and Associates
3379 Sheffield Circle
Sarasota, FL 34239-6717

BellSouth Mobility, Inc. (Atl)
1100 Peachtree St. NE, #910
Atlanta, GA 30309-4599
Fax: 404-249-0453

Bryant Law Firm
201 S. Monroe St., #500
Tallahassee, FL 32301
Tel: 850-222-8611
Fax: 850-224-1544

City of Lakeland
Mr. Gary Lawrence
501 East Lemon Street
Lakeland, FL 33801-5079
Tel: 941-499-6575
941-499-6344

Cole Law Firm
J.D. Thomas
1919 Pennsylvania Ave., NW
Washington, DC 20006-3458
Tel: 202-659-9750
Fax: 202-452-0067

David B. Erwin, Esq.
127 Riversink Road
Crawfordville, FL 32327
Tel: 926-9331

Department of Management Services
Carolyn Mason
4050 Esplanade Way, Rm. 135B
Tallahassee, FL 32399-0950
Tel: 850-922-7503
Fax: 850-413-7067

Ervin Law Firm
Everett Boyd
P.O. Drawer 1170
Tallahassee, FL 32302
Tel: 850-224-9135
Fax: 850-222-9164

MCI WorldCom, Inc.
Donna McNulty
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303

Floyd R. Self
Messer, Caparello & Self, P.A.
215 South Monroe Street, S. 701
Tallahassee, FL 32301-1876
Tel: 850-222-0720
Fax: 850-224-4359

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., #812
Tallahassee, FL 32399-1400
Tel: 850-488-9330

Pennington Law Firm
Peter Dunbar/Barbara Auger
P.O. Box 10095
Tallahassee, FL 32302
Tel: 850-222-3533
Fax: 850-222-2126

Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302
Tel: 850-681-6788
Fax: 850-681-6515
Atty. for Wireless One
Atty. for Omnipoint

Senate Committee on Regulated
Industries
John Guthrie
418 Senate Office Bldg.
Tallahassee, FL 32399
Tel: 850-487-5829
Fax: 850-487-5925

Swidler & Berlin
Rindler/Falvey
3000 K St. NW, #300
Washington, DC 20007
Tel: 202-424-7500
Fax: 202-424-7645

Telecommunications Resellers Assoc.
Andrew Isar
P.O. Box 2461
Gig Harbor, WA 98335-4461
Tel: 206-265-3910
Fax: 206-265-3912

Teleport Communications Group, Inc.
Frederik Cedarqvist
Two Teleport Dr., 3rd fl.
Staten Island, NY 10311-1004
Tel: 718-370-4657
Fax: 718-355-2795

Time Warner AxS of Florida, L.P. d/b/a
Time Warner Telecom
2301 Lucien Way, Suite 300
Maitland, FL 32751

Time Warner Communications
Carolyn Marek, VP, Regulatory Affairs
Southeast Region
233 Bramerton Court
Franklin, TN 37069
Tel: 615-376-6404
Fax: 615-376-6405

Utilities and Telecommunications (State
House)
Bill Tabor
410 House Office Bldg.
Tallahassee, FL 32399

Diana Caldwell
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Public Service Commission

State of Florida

-M-E-M-O-R-A-N-D-U-M-

DATE: August 9, 2000
TO: Blanca Bayó, Director, Records and Reporting
FROM: Jane Faurot, Chief, Bureau of Reporting
RE: DOCKET NO. 981444-TP, AGENDA CONFERENCE HELD 8-1-00

RE: NUMBER UTILIZATION STUDY: INVESTIGATION INTO NUMBER
CONSERVATION MEASURES.

DOCUMENT NO. 09465, 8-3-00

The transcript for the above proceedings has been completed and is forwarded for placement in the docket file, including attachments.

Please note that Staff distribution of this transcript was made to:

LEGAL, ECR, CMP

Acknowledged BY:

Man

JF/pc

PSC/RAR 28 (Rev1/00)

STATE OF FLORIDA

Commissioners:

J. TERRY DEASON, Chairman

E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 8/28/00

TO: N. Simo

FROM: R. Williams, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

10624-00

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No.

981444-TP or (if filed in an undocketed matter) concerning Response
to Staff's 8/14/00 letter, and filed on behalf of
BellSouth. The document will

be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (3/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

STATE OF FLORIDA

Commissioners:
J. TERRY DEASON, CHAIRMAN
E. LEON JACOBS, JR.
LILA A. JABER
Braulio L. Baez



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 9/19/00

TO: M. Gossen

FROM: K. Williams, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

11779-00

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

981444-TP

or (if filed in an undocketed matter) concerning Response

to staff's 9/13/00 request for 561 Utilization

and filed on behalf of BellSouth

The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (8/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: September 27, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Party Received in
Docket No. 981444

RECEIVED-PPSC
00 SEP 28 PM 1:01
RECORDS AND
REPORTING

This office has received the attached correspondence of Peggy Arvanitas dated August 20, 2000. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.



Peggy Arvanitas

8/20/2000

Dear Commissioner Jacobs,
They should be sending you
up from records & reporting
my original filing from 8/9
on BellSouth's variance - protest.

But I am sending you a
copy now so you can digest it.

Sincerely,

Peggy Arvanitas

P.S. for Aug 29 agenda

RECEIVED

AUG 24 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs

RE/MAX

First Class

620 Bypass Drive
Clearwater, Florida 33764

Office: (727) 797-7500

E-Mail: pegremax2000@yahoo.com

Each Office Independently Owned and Operated

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In RE: Number Utilization Study)
Investigation Into Number)
Conservation Measures)

Docket No. 981444TP

Filed: August 9, 2000

MOTION TO PROTEST BELL SOUTH'S REQUEST FOR VARIANCE OF NUMBER POOLING IMPLEMENTATION

Peggy Arvanitas, being the "lone consumer" on the docket 981444TP does hereby strongly protest any waivering of a major ILEC , Bellsouth Telecommunications, Inc (referred in the future as Bellsouth) from deviating in any way from the PAA order 00-1046. The variance of Bellsouth is for the exclusion of IAESS switch upgrades which need to be upgraded for number pooling for the trial dates in three area codes 954, 561, and 904. In protest of this filing, Peggy Arvanitas states the following:

1. May 30, 2000, the Commission issued order no. PSC 00-1046 PAA TP requiring all local number portability capable (LNP) carriers to implement number pooling in the 954, 561, and 904 area codes by Jan. 22, 2001, Feb 5, 2001, and April 2, 2001 respectively.
2. FCC order 95-116 third order May 1998, demands land line carriers (not CMRS providers) to be LNP capable in the top 100 MSA's by Dec 30, 1998. The 954, 561, and 904 area codes are within the geographic scope of the top 100 Metropolitan Service Areas.
3. Bellsouth representative, Michael Goggin stated at the May 5, 2000 Public Service Commission of Florida hearing his company was LNP capable. That asking for 3.0 pooling software and a delayed 2001 implementation date was NOT because they weren't LNP capable on their switches. That the additional time frame would be needed to "upgrade their switches for number pooling."
4. That if Bellsouth has 19 IAESS switches in Florida, and have known for two months, about 2003 phase out for software on AESS switch, Bellsouth has not and is not doing upgrades on this first generation switch.
5. That the timing for the proclamation of this variance comes after a rate center consolidation sub committee meeting, in which there was a discussion ILEC's might not receive 100% cost recovery for rate center consolidation.

6. That to economize (. . . defer the building of rate centers) this is an "administrative" AESS switch which has been compressed. This allows you 2-3 times the number of NXX's on a switch. Maybe you asking not to upgrade switches for 1-3 years, in violation of an order has more to do with a "wait and see attitude" on cost recovery reimbursement than on actually being unable to perform switch upgrades in reference to software.

7. The Public Service Commission of Florida is aware that an Auditing department has just been created and trained. There has been no formal review or verification of Bellsouth's declarations as to the limited number of pooling numbers that would be affected. (See Exhibit 2, Bellsouth's July 28 filing)

8. The 954, 561, and 904 area codes have and will be in jeopardy relief and/or lottery for almost two years , by the time the last pooling trial is implemented (as per the Order). Not allowing pooling of numbers, no matter how small, for 1-2 years impedes CLEC's who are not able to compete in those rate center-areas.

9. That the EXCLUSION of any LNP capable carrier is not "competitively neutral", as per the 1996 Telecommunication's Act Section 251. And the State of Florida is ordered by Florida Statutes 120 to be in compliance of the 1996 Telecommunication's Act (120.80)

10. Bellsouth, if it had the proper representation, should have been advised of the repercussions of pooling subcommittees for almost nine (9) months before the Order was final. The Lucent AESS switches will not have TECH SUPPORT after 2003. This should not keep them from upgrading their switches now. Today's date is August 8, 2000 Their "lack of expenditure" is not an emergency on the State of Florida's part.

Wherefore, Peggy Arvanitas asks the Commission to DENY the motion for variance, and make the PSC-00-1046-PAA-TP move forward. Also, as my Exhibit A (attatched), I would like to call attention to Bellsouth's plans to have an Internet hub in Miami up and running by the end of this year. If they can afford a new bussiness venture, they can afford to upgrade existing switches. And our November 28, 2000 Neustar pooling "inventory" meeting will be met with great concern as to our available numbering resources for 954 pooling.

Respectfully,
Peggy Arvanitas
Peggy Arvanitas

Peggy Arvanitas
REMAX 1st Class
620 Bypass Dr
Clearwater, Fla. 33764
(727)-742-1386

8/8/2000
BRIEFLY

St. Pete Times

BELLSOUTH TO BUILD INTERNET ACCESS HUB: BellSouth Corp. plans to build the first major hub for Internet traffic in the Southeast, providing a much more direct route for communications with other parts of the United States and the world. The new "network access point" in Miami, only the eighth in the country, is expected to open by the end of this year, easing network delays for everyday Internet users and boosting service to Latin America and the Caribbean, BellSouth said. At present, Internet traffic is routed to and from the Southeast from as far away as Washington or even one of the network hubs on the West Coast.

AOL LATIN AMERICA RAISES \$200-MILLION: America Online Latin America Inc. raised \$200-million in an initial public offering, at the low end of the price it was hoping to get. AOL Latin America sold 25-million shares at \$8 each, according to Salomon Smith Barney, an

STATE OF FLORIDA

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



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYO
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 10/3/00

TO: SIMS / BELL SOUTH

FROM: M. SANDERS, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

12524-00

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

921444-TP or (if filed in an undocketed matter) concerning _____

DATA REQ IAESS SWITCHES, and

filed on behalf of BELL SOUTH. The

document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (8/00)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

00 OCT 3 PM 3:50

RECEIVED-PPSC

DATE: October 20, 2000

TO: BLANCA BAYO, DIRECTOR, RECORDS AND REPORTING
MARGARET FEASTER, CHIEF OF INFORMATION PROCESSING

FROM: BOB CASEY, REGULATORY ANALYST SUPERVISOR, COMPETITIVE SERVICES

RE: ACCESS TO CARRIER-SPECIFIC NUMBER UTILIZATION AND FORECAST DATA

981444-TP

CRB/BA
PK

The FCC has granted state commissions access to carrier-specific semi-annual number utilization and forecast data which is received by the North American Numbering Plan Administrator (NANPA). On October 12, 2000, Mr. D'Haeseleer sent a letter (attached) to NANPA advising them that the Florida PSC wishes to receive this semi-annual data.

The information will be sent from NANPA, to me, via e-mail. BIP should be advised that Mr. John Manning of NANPA has informed me that these files will be large when transferred to the commission. The files are also considered confidential and must be treated as such. I have reviewed APM 11.04, and Rule 25-22.006, F.A.C. regarding confidential information. Please advise me of any special handling procedures which will be needed to receive and manage this information. Thanks.

cc: Walter D'Haeseleer, Director, Division of Competitive Services
Beth Salek, Assistant Director, Division of Competitive Services
Cheryl Bulecza-Banks, Chief, Bureau of Competitive Safeguards

STATE OF FLORIDA

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



DIVISION OF COMPETITIVE SERVICES
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

October 12, 2000

John Manning
NeuStar, Inc.
NANPA
CO Code Administration
1120 Vermont Avenue, N.W., Suite 550
Washington, D.C. 20005

Re: Access to Carrier-Specific Number Utilization and Forecast Data

Dear Mr. Manning:

In its Numbering Resource Order, the Federal Communications Commission has ordered that reporting carriers provide number utilization and forecast data to the North American Numbering Plan Administrator (NANPA) semiannually. The FCC required that all reporting carriers file their first report no later than August 1, 2000. That time frame was subsequently changed to September 15, 2000. In addition, the FCC granted state commissions access to the information reported to NANPA, provided that the state commissions have appropriate protections in place to preclude disclosure.

Prior to obtaining access to the reported data, NeuStar indicated that state commissions must certify, in writing, that appropriate state laws and regulations are in place to safeguard confidential service-provider data from disclosure. To that end, please be advised that appropriate protections exist under Florida law to safeguard confidential and proprietary information from disclosure.

It is my understanding that these documents will be provided to us on a regular basis, at no cost.

RAR Official Filing:

11/6/00***11:24 AM*****Kay Flynn*****1**

Kay Flynn

To: Bob Casey
Cc: Cheryl Bulecza-Banks; Beth Keating; Rick Wright; Blanca Bayo; Marguerite Lockard; Linda Williams
Subject: RE: Central Office Code Utilization reports

Bob, you will need to bring the disk to us for logging in. We will show it as filed in 981444-TP and treat it as filed under a "claim" since it is a telecommunications matter. I don't see your name among assigned staff for this docket, so you can do one of two things to have access to it:

- 1) have your name added to the CASR for the docket, or
- 2) have your director prepare a memo for Dr. Bane's OK indicating your "need to know" and need to have access to the material.

Let me know if questions.

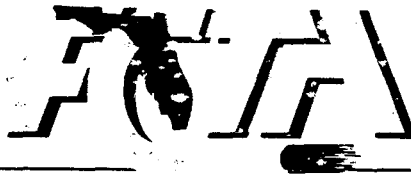
Kay

-----Original Message-----

From: Bob Casey
Sent: Thursday, November 02, 2000 10:20 AM
To: Kay Flynn
Cc: Cheryl Bulecza-Banks; Beth Keating; Rick Wright
Subject: Central Office Code Utilization reports

As you may recall from my October 20, 2000 memo to Blanca Bayo, the North American Numbering Plan Administrator (NANPA) will be sending the Commission semi-annual central office code utilization data as requested by Mr. D'Haeseleer. As I mentioned to you, at our request, NANPA agreed to send this information on a disk instead of over the internet. I wanted to notify you that I have received the first disk which is being kept under lock and key until the appropriate confidential handling procedures are formulated within the division. Thanks.

P.S. NANPA is not a utility and the Commission does not have any jurisdiction over them. However, we have agreed to keep the information on the disk confidential.



*Updated
11-6-00*

Florida Cable Telecommunications Association

Steve Wilkerson, President

FCTA CHANGE OF ADDRESS

TO: Vendors
FROM: Steve E. Wilkerson, President
DATE: October 10, 2000
RE: Move to New FCTA Headquarters

As of Monday, October 16, 2000, the Florida Cable Telecommunications Association headquarters is moving to a new location. While our phone and fax numbers, as well as e-mail and web site address, will remain the same (see below), our mailing address will change.

Please note this new information below on all correspondence:

Florida Cable Telecommunications Association
246 East 6th Avenue
Tallahassee, Florida 32303 - 6208
850/681-1990 (tel)
850/681-9676 (fax)
fcta@fcta.com (e-mail)
www.fcta.com (web site)

*copy 11-6-00
R/R / Wang*

Please also be aware that this move will occur over the course of a few days, beginning Friday, October 13, and ending (hopefully) by Wednesday, October 18, so it is possible that there will be interruptions in phone, fax and computer services. If you are unable to reach the office during this time, please try either 850/322-3034 or 850/212-9072 as alternatives.

Thanks for your patience while this transition is underway. Please call with any questions or concerns.

*Old
m/ 310 North Monroe Street
Tallahassee, FL 32301-7636*

Hong Wang

From: Martha J [marthaj@fcta.com]
Sent: Tuesday, October 31, 2000 3:48 PM
To: Hong Wang
Subject: Change of address

FYI

We have moved, our new address is

246 E. 6th Avenue
Tallahassee, FL 32303

Please change your records accordingly.

Thanks

Martha
681-1990

920260, 960100, 960786,
960846, 960847,
980253, [REDACTED], 981834,
990321, 990455, 990517,
990546, 990649, 990994,
991376, 991377, 991378,
991473, 991930, 000028,
000075, 000121, 000399,
000604, 000636, 000649,
001332

Done 11/02/00

Hong Wang

From: Blanca Bayo
Sent: Friday, November 03, 2000 9:41 AM
To: Nonnye Grant; Sandy Moses; Hong Wang; Kay Flynn
Subject: FW: New FAX number for Senate Regulated Industries

Please make changes to our mailing lists as appropriate. Thanks.

-----Original Message-----

From: Diane Lee
Sent: Friday, November 03, 2000 9:11 AM
To: Blanca Bayo
Subject: FW: New FAX number for Senate Regulated Industries

FYI - Didn't know if any of them are on your list or not.

-----Original Message-----

From: Mary Bane
Sent: Friday, November 03, 2000 9:01 AM
To: Susie Folsom
Cc: Cindy Miller; Bob Trapp; John Williams; Richard Tudor; Beth Salak; Catherine Bedell; Diane Lee
Subject: FW: New FAX number for Senate Regulated Industries

Susie, please update our info sheet on legislative contacts. Also, include both the "temporary" and the permanent fax numbers for House Utilities and Communications. Delete the names of staff who have left, but not John Guthrie yet.

-----Original Message-----

From: GUTHRIE.JOHN [mailto:GUTHRIE.JOHN@leg.state.fl.us]
Sent: Friday, November 03, 2000 8:13 AM
To: Mary Bane (E-mail); Dave Roberts (E-mail)
Subject: New FAX number for Senate Regulated Industries

We appreciate the FAX messages we frequently receive from the Florida Public Service Commission and the Florida Department of Business and Professional Regulation. The FAX number for the Senate Committee on Regulated Industries has changed. The new number is 850-410-5120. Please update your distribution lists so we can continue to receive your messages. Also, we would appreciate it if you could inform others in your agency of this change.

Thank you.

John Guthrie



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

00 NOV 11 PM 4:28

RECEIVED-PPSC

DATE: November 13, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Person Received in
Docket No. 981444-TP

This office has received the attached letter from Peggy Arvanitas. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.



Peggy Arvanitas

October 13, 2000

AIRBORNE EXPRESS

Ms Blanca Bayo, Director
Records and Reporting
Rm 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Fla. 32399-0850

RE: FPSC Docket 981444 TP

Dear Ms. Bayo,

Enclosed for filing is an original and 10 copies of a letter in favor of Commissioners ordering Rulemaking, in response to Staff's Recommendation to dismiss the Rulemaking for the Voluntary Stipulation as "premature." Please distribute this to the Commissioners, as staff has put this on an emergency "Internal Affairs" agenda for Tuesday morning, October 17, 2000.

Also, please acknowledge receipt of these documents by stamping the extra copy of this letter as "filed" and returning same to me.

Thank-you for your assistance in this filing.

Sincerely,

Peggy Arvanitas
Peggy Arvanitas
"The Lone Consumer"

RECEIVED

OCT 19 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs

RE/MAX

First Class

620 Bypass Drive

Clearwater, Florida 33764

Office: (727) 797-7500

E-Mail: pegremax2000@yahoo.com

Each Office Independently Owned and Operated

RECOMMENDATION TO APPROVE THE VOLUNTARY STIPULATION GOING TO RULEMAKING

On August 1, 2000 at the Florida Public Service Commission made a motion for Staff to recommend that the Commissioners could order Rulemaking for the Voluntary Stipulation. The recommendation that the Voluntary Stipulation should go into Rulemaking was filed in the order PAA 99-1393-S-TP, although there was no time limit determined for this action. June 20, 2000, Peggy Arvanitas, consumer misnamed a filing and called it a "reconsideration" instead of "Protest" of the order PAA 00-1046. Due to my misnaming, the Commissioners dismissed my filing. This is in response to the Staff's (legal department) Memorandum dated October 11, 2000 that Rulemaking would be premature. The reason for this clarification is the incorrect and unanswered questions that staff has put forth, and so the Commissioners will see this in the "big picture." And as I have been in over four FCC filings in the past year, I believe my simple and defining clarity will move the Commissioners to see that I am correct in this need for Rulemaking.

THE VOLUNTARY STIPULATION DOES NOT INCLUDE ALL LNP CAPABLE CARRIERS

By the measures of the Staff's memorandum, (pg 1) staff quotes from the Voluntary Stipulation 5) "Service providers to advocate the adoption of the Voluntary 1000 block management measures contained in the Stipulation by all other Florida NXX code holders that were not part of the Stipulation."

The reason for this is the most obvious reason to go into Rulemaking for the Voluntary Stipulation, and this was verbalized by Office of Public Council Charlie Beck: only the Joint Petitioners that signed the Voluntary Stipulation are required to abide by the VOLUNTARY guidelines. Charlie Beck stated at the hearing for the docket 990373-TP that unless the State of Florida went into Rulemaking, this Voluntary Stipulation would not be binding to the other eligible carriers (LNP capable). The agreement by SOME of the carriers is not binding for ALL of the eligible carriers.

VAGUE TERMINOLOGY FOR LNP CAPABILITY, AS APPLIES TO CMRS PROVIDERS

The Voluntary Stipulation from the PAA order 99-1393-S-TP says that as carriers become LNP capable, they must participate in the Florida Number Pooling trials. Yes, CMRS providers, who by the way consume probably over 30% of the available numbers of 954, 561, and 904 area codes are not LNP capable YET. The FCC order 00-104 makes mention, also, that the CMRS providers be LNP capable BY Nov. 24, 2002. It does not say ON. The text of the discussion for CMRS providers is that they are discussing MIN/MDN technology to allow for "roaming" for portability. But, after reading both FCC 95-116 (3rd and 4th order) and FCC 00-104, I do not see any provision that CMRS providers must be Local Number Portability AND DO ROAMING before doing POOLING.

The terminology also in the State of Florida order 00-1046 is "as they become LNP capable." When a land line upgrades it's switches and becomes automated, they have certain OSS (operational support system) upgrades. This would be LINUX or UNIX...OSS upgrades are used to facilitate back office billing. To verify if a landline company is LNP capable, you might do physical testing, or you could acquire records from a company like Lucent, if this company is the manufacturer of the switch, as they sell software upgrades. These are also mentioned in Bellsouth's IAESS request for variance filed July 28,2000. Most major companies have pre-paid cellular phone service. There is a tremendous data base requirement (OSS) for this type of service. Since the FCC's 00-104 order stipulated that as they became LNP capable they must do number pooling, and the ability to do roaming before doing pooling was not a requirement, then ALL CMRS providers will need to be a part, also, of the Voluntary Stipulation, so the non contamination rules of 1000 block numbers will be followed, and they will have less contamination. And the State of Florida PSC will need to clarify the type of checks they will have in place to welcome "CMRS providers into Florida's pooling arms."

UTILIZATION REQUESTS

September 15, 1999 the FCC issued Order 99-249, granting Florida's additional Number Conservation Methods. On pg 2 of the Staff's filing (memorandum) She states that the FCC 's Order allowed Florida to "5) request number utilization data from all carriers."

Unfortunately, the Voluntary Stipulation's Joint Petitioners only agreed to "... submit utilization reports upon written request of the FPSC, but no more than twice per year." If this is what SOME, not ALL of them agreed to, wouldn't you want to clarify this in Rulemaking?

SIX MONTHS OF INVENTORY

First, there is a "typo" on the Staff's Memorandum. On pg one, she states 3)

"Service providers will hold no greater than 9 (should be 6 months) of 1000 block resources to meet customer demand." The Order 99-1393TP stipulated, first, 6 months. But "six months of inventory" from NANPA (NXX allocation) for numbers allocated is not the same as "six month's inventory...to meet customer demand. To receive additional resources from NANPA you cannot ask for more than 6 months past plus 15% from your MTE worksheet. That's projected need of numbers from the 10,000 block NANPA.

We are allocating 1000 block numbers to be taken from the code holders, and customer demand would be according to numbers allocated to customers. This would necessitate a utilization threshold use-type formula. Would it not?

Since CMRS providers have at least 30% of the 954,561 and 904 numbers, and Bellsouth, from their IAESS Variance request want to exclude approx. 30-40% of the numbers on those switches from immediate (2 years later) pooling, how many numbers are you going to have available for pooling if Bellsouth is your major ILEC? And if this is not stipulated in Rulemaking, anything slightly vague in Bellsouth's mind has a terrible way of going to the Appeal's division.

CONCLUSION

Caldwell's comments (yes, I can tell her writing style) that she is reviewing wireless comments concerning this matter concerns me. That she thinks this should be pushed off because the "Commission's jurisdiction may be questioned" makes me wonder that if this docket is making her tired, she'd be better served to surrender this docket to someone else. This is the Public Service Commission. We are always concerned about the PUBLIC, aren't we?

Unfortunately, she is also incorrect as she mistakens the Voluntary Stipulation as "another conservation measure." The Voluntary Stipulation is a group of rules clarifying the methodology of 1000 block pooling. Her understanding is limited in this area, as she does not do FCC filings (Levent Ileri does). So her interpretation of Florida Statutes 120.54(1) is incorrect. All matters concerning this issue are resolved and if she is aware of another FCC filing I do not know of that could enhance this Rulemaking request, I am all ears.

I think the issues I brought forth are adequate for the Commissioners working for the Public Service Commission to post haste allocate some time to clarify this and go into Rulemaking. I shouldn't have to beg for the next nine months for the State of Florida public. And even though this is a "generic docket" (Caldwell's words) for 981444 TP, it is initiating pooling on the East coast and it will have major repercussions for the West coast 727 and 813 area codes which are nearing jeopardy relief.

A Certificate of Service is attached to this filing.


Peggy Arvanitas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing in Docket 981444-TP have been served upon the following parties by . Mail this 13th day of October, 2000.

Diana Caldwell, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable J. Terry Deason*
Chairman,
Florida Public Service Commission
Commissioner's Suite, Room G-335
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable E. Leon Jacobs*
Commissioner
Florida Public Service Commission
Commissioner's Suite, Room G-335
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Lila A. Jaber*
Commissioner
Florida Public Service Commission
Commissioner's Suite, Room G-335
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Braulio L. Baez*
Commissioner
Florida Public Service Commission
Commissioner's Suite, Room G-335
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Charles J. Rehwinkel
Susan Masterton
F. Ben Poag
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Ms. Peggy Arvanitas
c/o RE/MAX First Class, Inc/
620 Bypass Drive
Clearwater, FL 33764

Mr. Fredrick Cderqvist
AT&T
Room 2A114
900 Routes 202/206 N
Bedminster, NJ 07921

Marsha Rule, Esq.
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

BellSouth Mobility, Inc.
1100 Peachtree St., NE #910
Atlanta, GA 30309-4599

Mr. Frank Heaton
Cellular One of Southwest Florida
2100 Electronics Lane
Ft. Myers, FL 33912-1605

Global NAPS, Inc.
10 Merrymount Road
Quincy, MA 02169

GTE Wireless Incorporated
245 Perimeter Center Parkway
Atlanta, GA 30346

Richard Melson, Esq.
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

ITC^DeltaCom
Regulatory Affairs Manager
4092 Memorial Parkway, SW
Huntsville, AL 35802-4343

Donna Canzano McNulty, Esq.
MCI WorldCom, Inc.
The Atrium, Suite 105
325 John Knox Road
Tallahassee, FL 32303

Floyd Self/AT & T
215 S. Monroe St # 701
PO Box 1876
Tallahassee, FL 32302

Greg Darnell
MCI WorldCom, Inc.
Concourse Corporate Center Six
Suite 3200
Atlanta, GA 30328

Charles Beck, Esq.
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32399-1400

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Omnipoint Communications
600 Ansln Blvd.
Hallandale, FL 330099

Ms. Robin Norton
Technologies Management
P.O. Drawer 200
Winter Park, FL 32790-0200

Mr. David Christian
GTE Florida, Incorporated
106 E. College Avenue, Suite 810
Tallahassee, FL 32301

Michael A. Gross
Vice President, Regulatory Affairs
and Regulatory Counsel
Florida Cable Telecommunications Association
310 N. Monroe St.
Tallahassee, FL 32310

ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060-3357

Michael Goggin
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Gloria Johnson
Associate General Counsel
BellSouth Cellular Corp.
1100 Peachtree Street, N.E., Suite 910
Atlanta, GA 30309-4599

Kimberly Caswell
Verizon Florida, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110


John Lummus
TriVergent
200 N. Main Street
Suite 303
Greenville, SC 92601

Kelly Faul
Intermedia Communications
3625 Queen Palm Drive
Tampa, FL 33619

Laura Gallagher
101 E. College Ave., Ste. 302
Tallahassee, FL 32301

Robert S. Wright
Landers & Parsons, P.A.
310 West College Avenue
P.O. Box 271
Tallahassee, FL 32302

Jill N. Butler
Vice President of Regulatory Affairs
Cox Communications, Inc.
4585 Village Avenue
Norfolk, VA 23502


Peggy Arvanitas



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECEIVED-TPSC
NOV 14 PM 4:27
RECORDS AND
REPORTING

DATE: November 13, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Person Received in
Numerous Dockets

This office has received the attached packet from Michael Knapp, Executive Director of Telcordia Technologies, Inc. The information contained in the packet may apply to Dockets Nos. ~~990455~~ 990455, 990456, 990457, and 990517. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the packet does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.

filed in 981444



Performance from Experience

Michael J. Knapp
Executive Director, Federal &
State Regulatory Relations

Telcordia Technologies, Inc.
2020 K Street, NW Suite 400
Washington, DC 20006
Voice: 202.776.5454
Fax: 202.776.5424
Email: mknapp@telcordia.com

An SAIC Company

August 30, 2000

E. Leon Jacobs, Jr., Commissioner
Florida Public Service Commission
2540 Shumard Oak Blvd
Gerald Gunter Building
Tallahassee, FL 32399-0850

Dear Commissioner Jacobs:

Telcordia Technologies, Inc. realizes that state commissions have been and will continue to be challenged to make decisions on numbering matters. Attached to this letter is a brochure that was designed to make you aware that Telcordia possesses numbering expertise to help you meet your numbering needs and explain why we believe we are positioned to be your choice as the thousands-block number pooling trial administrator in Florida.

Telcordia offers you a choice when making a decision on who will be the administrator of your number pooling trial. This will enable you to make your selection based on quality, experience, economics, and value. With Telcordia, you will have an administrator that focuses on making your trial a success.

The brochure offers evidence of Telcordia's unmatched experience, expertise, and reputation in numbering administration. This complete set of credentials is a foundation for Telcordia being considered for selection as administrator for trials of number pooling in Florida and also for being considered for selection as administrator for the impending national thousands-block number pooling implementation.

Telcordia would be pleased to meet with you to further discuss your needs regarding thousands-block number pooling requirements. ~~Please review the brochure and give me a call to schedule a meeting.~~ My telephone number is 202-776-5454. I look forward to hearing from you.

Sincerely,

Michael Knapp
Executive Director
Federal and State Regulatory Relations
Telcordia Technologies, Inc.

Attachment



RECEIVED

SEP 04 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs



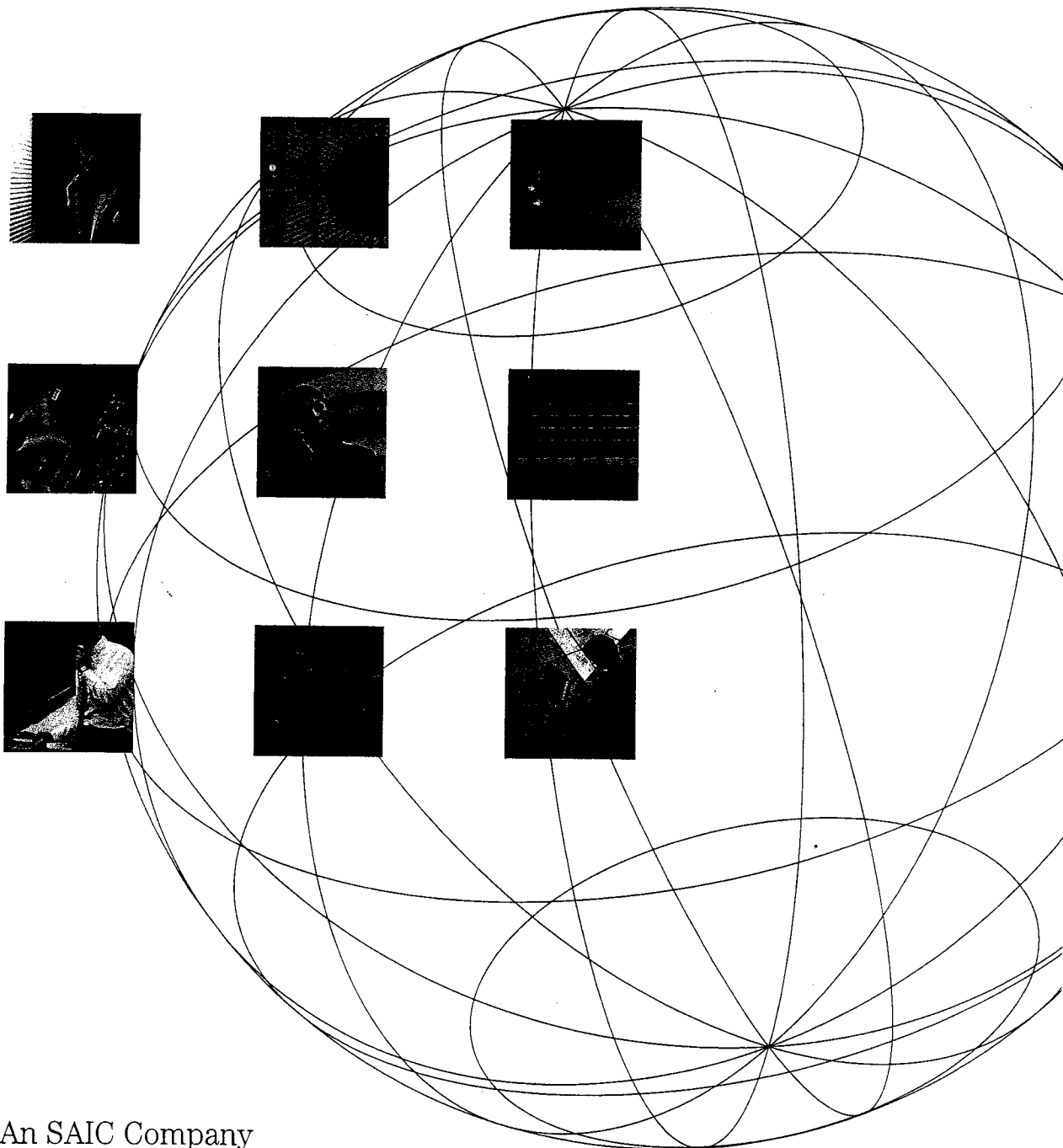
Performance from Experience

An SAIC Company



Performance from Experience

Telcordia Technologies... Delivering Tomorrow's Solutions Today



An SAIC Company

Performance from Experience

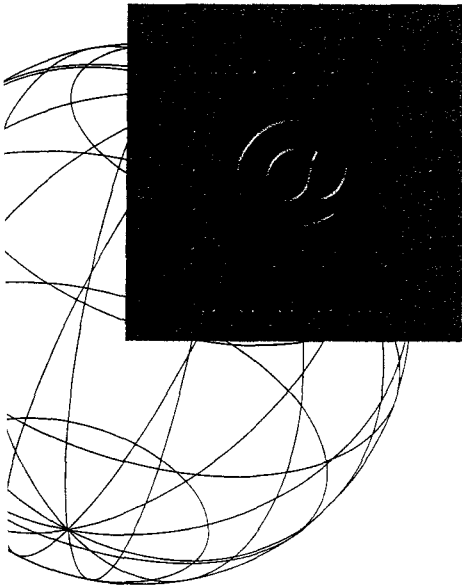
At Telcordia Technologies we apply our vast experience and broad knowledge to create and deliver telecommunications solutions that work, now and in the future. Telcordia Technologies is a leading provider of telecommunications networking software and professional services, and the telecommunications arm of Science Applications International Corporation (SAIC), one of the world's largest systems integration and program management companies. Prior to our acquisition in 1997 by SAIC, we were known as Bellcore. Our information technology solutions contribute to the success of telecommunications carriers, enterprises, and governments, worldwide. We help our customers optimize existing networks, transition to higher levels of service, and build new networks.

As Bellcore, we served as architects of the U.S. telecommunications system, so our experience is unparalleled. As Telcordia Technologies, we are moving the industry toward the next generation of telecommunications infrastructure.

Our experience makes us uniquely qualified to lead the way into the future, because we set the standard for software quality and network performance. Our insistence on quality, long recognized by industry experts, ensures the performance of our solutions.

Telcordia consultants, researchers, and software engineers are dedicated to creating and implementing the next generation of telecommunications. Our ability to envision the future and make it a reality is helping companies, large and small, realize their business objectives.

We invite you to learn more about Telcordia Technologies and how our proven expertise can help your business.



Telcordia Technologies...Envisioning the Next Generation of Telecommunications

Focus on Telcordia™ Next Generation Network Solutions

We're leading the way into a new era in communications technology. Voice, data, wireless, and cable communications are coming together, and Telcordia Next Generation Network Solutions will make this convergence possible.

Telcordia Next Generation Network Solutions provide the tools to move voice, fax, data, and video through an integrated, packet-based network. These networks are more efficient to build and less costly to operate, providing high value to our customers. Telcordia Next Generation Network Solutions will help enable our customers to:

- *Earn greater revenue and profit through rapid deployment of flexible, high-value service bundles*
- *Provide unique integrated applications, services, and technologies that differentiate our customers from their competitors*
- *Achieve capital and operating savings through voice and data network consolidation*
- *Enable service innovation through industry standard interfaces (e.g., CORBA®, Java™) and open interfaces.*

Because of the unique and critical role Telcordia Technologies has played in the development of telecommunications infrastructure around the world, we continue to lead the industry as it moves toward the next generation of communications.

The global telecommunications industry is undergoing two major transitions: deregulation of the industry and transition from a circuit-based network infrastructure to a packet-based infrastructure. Deregulation has created intense competition among telecommunications providers and brought many new companies to the industry. The rapid adoption of packet-switched communications has created a host of new data and multimedia services.

Telcordia Technologies is poised to meet the challenges these changes bring and help our customers capitalize on the opportunities these changes present. We stand alone in our ability to provide the fundamental network software, operations support systems, and associated services that allow the seamless interconnection of next generation networks.

This kind of leadership is not new for us. Our winning business strategy relies on envisioning the future, and then making that future a reality. We've enacted this strategy again and again throughout our history, helping our customers optimize their networks and businesses.

Telcordia Technologies...the Professionals to Deliver the Right Solutions

We've assembled the professionals necessary to optimize existing networks and transition them into the next generation of communications. We understand our customers' businesses and the challenges they face, enabling us to tailor voice and data solutions based on size, the technologies currently in place, and the directions in which they want to grow. We can improve every aspect of new or existing networks, from network planning and configuration to long-term maintenance and support, and can demonstrate ways to improve business efficiency and profitability. Our capabilities include:

- Business Consulting Services
- Network and System Design
- Generic Requirements and COMMON LANGUAGE® Products
- Integration and Deployment Services
- Operations Support Systems
- Network Systems
- Training and Learning Services
- Applied Research.

Telcordia by the Numbers

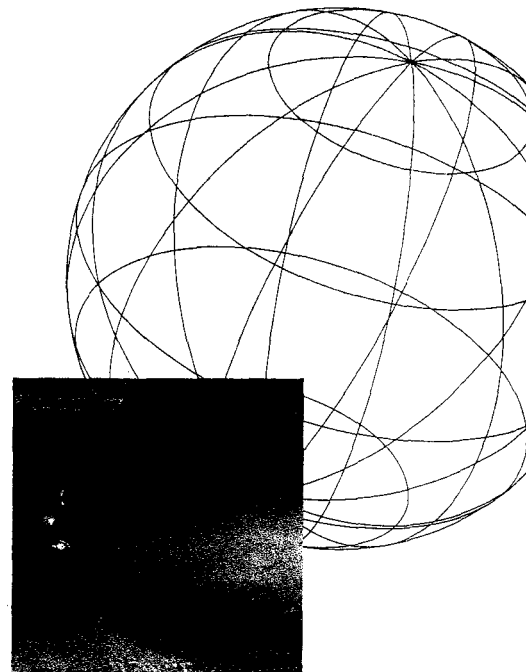
- Lines of code maintained by Telcordia Technologies: more than 120,000,000
- Lines of code created or improved each year by Telcordia Technologies: 12,000,000 – 18,000,000
- Percentage of existing U.S. telephone systems dependent on software created or maintained by Telcordia Technologies: 80%
- Percentage of U.S. Toll Free calls made that are dependent on Telcordia Technologies software: 100%
- Percentage of Telcordia Technologies applied researchers holding Ph.D.'s: 80%
- Number of patents granted to Telcordia Technologies: more than 680
- Number of professionals trained by Telcordia Technologies each year: 30,000
- Number of companies those professionals represent: 1,300
- Percentage of Telcordia software support systems projects delivered on-time: 99%
- Our satisfaction level among software customers: 95%.

A closer look at each of our areas of business will show the ways in which Telcordia Technologies can help businesses grow and evolve. The solutions we provide are customized to meet the needs of networks and businesses of all sizes, from the largest telecom carrier to the newest start-up.

Business Consulting Services

Telcordia business consulting professionals help customers improve and build their businesses. They provide financial, marketing, and engineering know-how as well as unparalleled network expertise. In particular, we support customers in their efforts to develop a comprehensive assessment of the profitability of new networks. Services include:

- Business plan development that addresses customer needs, competition, current network, technology choices, service portfolio, and regulatory issues
- Regulatory analysis, with recommendations to help ensure that implementation plans and business strategies address the constraints and opportunities of the particular regulatory environment
- Impact analysis, an assessment of how new technology affects processes and people, as well as a plan to integrate change management into the overall implementation plan.





Focus on Leadership

Our leadership in the world of telecommunications is highlighted by the following achievements:

- *Leading the industry in setting technical criteria through our Generic Requirements and COMMON LANGUAGE Products*
- *Defining critical technologies such as SONET or SDH, ATM, and SS7, that are the underpinning of today's networks*
- *Developing the core software that allows telecommunications companies in the U.S. to handle more than 150 million service orders annually and to manage almost 200 billion calls at extraordinarily high levels of reliability*
- *Working with over 500 companies in 55 countries to incorporate our software into their network systems.*

Network and Systems Design

At Telcordia Technologies, our network and systems design skills and experience are unmatched in the industry. Whether our customers are planning a new network or re-engineering an existing network to improve efficiency, Telcordia can provide solutions that meet their business needs today, and will grow with them to help ensure future success.

Telcordia has network design skills intended to ensure the interworking of diverse technical platforms. Our solutions begin with business, technical, and public policy assumptions about the overall network, including its services and network management. With our customers, we identify alternative evolutionary paths, along with critical issues. We then formulate overall network management plans to coordinate network components as they grow and change.

Our network management skills can be applied to the definition and evolution of network management architectures, applications, detailed requirements, information model specifications, interface requirement mappings, and associated systems engineering consultation. These solutions help:

- Support multisupplier interoperability
- Increase the profits from new customer services enabled by new network architectures, platforms, and services
- Increase the reliability and reduce the cost of operations functions
- Reduce the time and costs associated with design, development, and deployment of network elements and associated network management systems.

Generic Requirements and COMMON LANGUAGE Products

Publications such as *Telephony* and *Electrical Engineering* have credited Telcordia Technologies with defining the U.S. telecommunications network, and inventing and defining the technologies central to the Information Age. Telcordia Generic Requirements and COMMON LANGUAGE Products continue to shape the industry.

Telcordia Generic Requirements have assisted service providers in planning their networks, and in purchasing equipment for interconnection within those networks. They also help suppliers design their products to meet the needs of their customers. The FCC's Network Reliability Council 1996 survey found that Telcordia Generic Requirements were the most widely-used reference on network reliability and integrity within the industry. Open technical criteria such as the Telcordia Generic Requirements benefit enterprises, services/network providers, equipment suppliers, and even nations, by promoting interoperability, network integrity, and commerce.

For the past thirty years, the COMMON LANGUAGE Products organization and its predecessors have focused on creating and enhancing information products that simplify global communications among people, organizations, and computer systems.

The Telcordia COMMON LANGUAGE Products suite is the key to managing telecommunications networks effectively and establishing the vital interconnections on which our industry is built. COMMON LANGUAGE Products and related services can be customized to:

- Improve network and service management
- Optimize flowthrough
- Stimulate existing revenue streams and create new ones.



Integration and Deployment Services

As a part of SAIC, one of the world's leading providers of systems integration services, Telcordia offers comprehensive network integration and program management services. These include large-scale technology deployment services, such as DSL, change management, and interoperability and field testing services. Our new technologies and reliable solutions help telecommunications companies, Internet service providers, cable service providers, financial institutions, and other enterprises maintain their edge in today's marketplace. Our experts integrate systems, software, and network services, provide interconnection services and interoperability testing, and improve security and fraud management.

Focus on Recent Accomplishments

In the past several years, Telcordia Technologies professionals have met these challenges, and many others like them:

- *Telcordia received the IEEE Corporate Innovation Recognition Award for worldwide leadership in broadband fiber optic telecommunications systems. We were recognized for initiating the concept, establishing detailed specifications, and promoting the development and deployment of synchronous optical networks (SONET and SDH).*
- *Telcordia developed the prototype for the first video-on-demand system and created a prototype for an electronic panning camera.*
- *Telcordia experts led an international team in breaking the elusive RSA-129, a code once thought unbreakable. Using Telcordia-designed computational software, the Internet, and a super computer, the team factored the 129-digit number, proving the vulnerability of systems using codes this length.*
- *Telcordia developed a single protocol for communications between network elements and their supporting software-based operations systems for alarm surveillance and analysis, performance monitoring, and other network maintenance functions.*

Operations Support Systems

Telcordia Technologies is the leading developer and supplier of Operations Support Systems (OSSs) for telecommunications infrastructures all over the world. We are the market-share leader for four simple reasons: experience, quality, on-time delivery, and our ability to both automate and integrate telecom processes, enabling hands-off, flow-through, virtually error-free operations. Our software solutions help our customers improve productivity, master steep growth curves, achieve ambitious objectives, and measure results. Telcordia OSS users have achieved up to 90% flow-through rates and are among the most operationally efficient telcos in the world.

Our OSSs are bundled into five integrated suites, each supporting a specific functional area, including Network Design and Inventory; Service Provisioning and Activation; Service Assurance for both Performance and Fault Management; Work and Force Management; and Billing, Negotiation, and Interconnection. Clients can mix and match our OSS suites and the components within each suite to create the right business solution for their companies. Our OSSs are also designed to support your implementation of, or transition to, an IP-based Next Generation Network, because all Telcordia systems are "dual-mode" – fully operational in both packet-switched and circuit-switched environments.

Network Systems

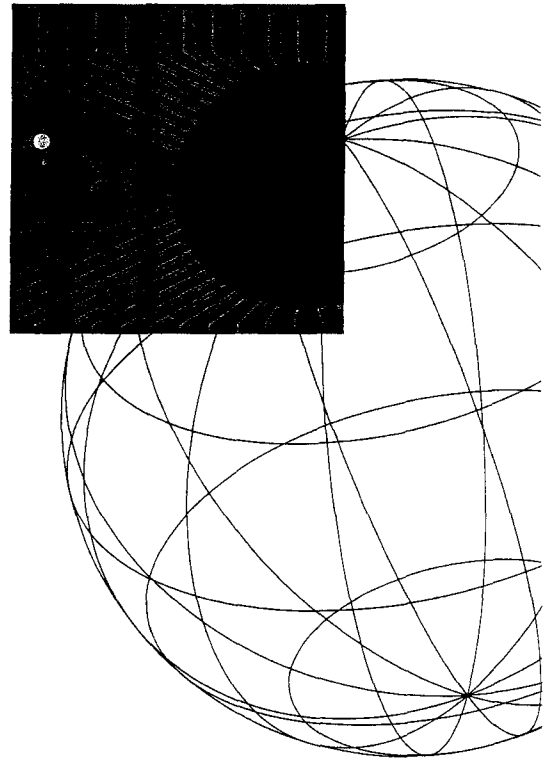
Telcordia designs and builds solutions for both fixed and mobile customers in some of the world's most competitive telecommunications markets. Our Network Systems family delivers complementary solutions that support the deployment of new services for increased revenues and profit, capital and operations cost savings, competitive differentiation, and greater customer loyalty. On every continent, the proven performance, quality, and open architecture of Telcordia Network Systems software are enabling success for network operators in the new century of communications.

Our Network Systems family consists of several integrated suites of services, each supporting a specific functional area, including Intelligent Network Services; Mobility Services; Number Portability; Loop Unbundling; Toll-Free Services; Network Database Services; and the core of Next Generation Networks, the Telcordia™ Call Agent. Telcordia Network systems reflect a tradition based on pragmatic and real-world engineering. Our leadership in these areas translates into the greatest flexibility in performance, services, and economics. Telcordia Network Systems can give our customers the ability to create and manage a plethora of new services, as well as the integration and interoperability of these services in diverse environments.

Focus on Software Quality

Telcordia Technologies is the standard-setter for error-free performance. Several independent organizations responsible for rating software quality concur:

- *Telcordia has been assessed at Level 5 of the Capability Maturity Model® for Software, the highest level for this software process model developed by the Software Engineering Institute of Carnegie Mellon University, placing Telcordia among an elite group of organizations in the world, and making it the first U.S. company of over 3,500 software professionals to attain this distinction.*
- *Telcordia Service & Business Management Systems and Operations Support Systems, formerly called Software Systems, together comprise one of the largest organizations in the world to be awarded ISO 9001 certification by Bureau Veritas Quality International for their Quality Management System.*
- *Software Productivity Research, Inc. found that based on faults per thousand function points, Telcordia software performs 10 times better than the industry average.*



Focus on Innovation

Telcordia Technologies applied its research capabilities to change the communications industry:

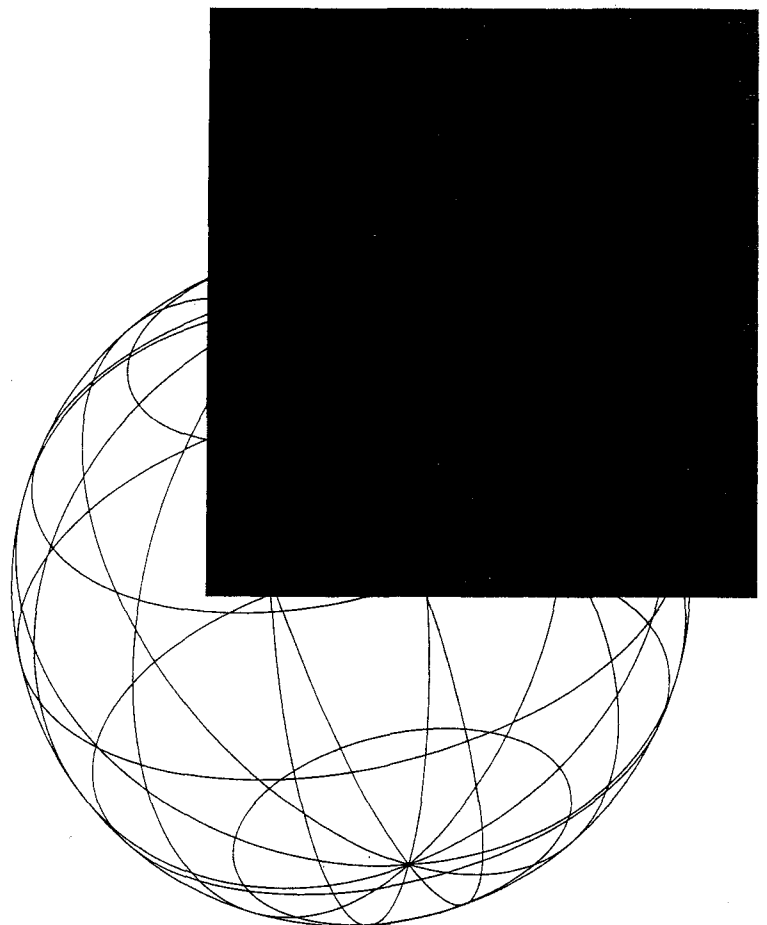
- *We invented the Plastic Lithium Ion Battery (Telcordia™ PLiON™ Battery Technology), which can be bent, folded, or flexed into virtually any shape or configuration to empower makers of portable electronic products with unprecedented design freedom.*
- *We developed one of the first Internet telephony systems in 1985, and more recently produced the architecture and key protocol definitions for Telcordia Next Generation Network Solutions, our packet-based solutions.*
- *Telcordia research has pioneered the use of dense wavelength division multiplexing (DWDM) technologies in optical networks to achieve capacity enhancements, protocol transparency, and multiservice functionality.*
- *We have helped the Defense Advanced Research Projects Agency with many of its advanced communications research projects, including gigabit networks, next generation Internet, active networking, and most recently, smart data.*
- *Telcordia research has led the industry in defining the standards for low-power, digital wireless communications and in establishing the interfaces for seamless interworking of wireless and wireline networks.*
- *Telcordia research has established novel and effective mechanisms for monitoring, controlling, and managing heterogeneous, multiservice networks for improved performance, cost-effectiveness, and availability.*
- *Telcordia research has produced a stream of mathematical inventions that help to secure, manage, store, retrieve, and mine data from computer networks.*

Training and Learning Services

Telcordia Technologies is the industry leader in telecommunications training, offering more than 600 self-paced and instructor-led courses. These courses help ensure that our customers can implement telecommunications technologies effectively, and show them ways to leverage a variety of skills to build their businesses.

Applied Research

Underlying all Telcordia products and services is the innovation, advanced thinking, and scientific and technological expertise of the Telcordia Applied Research Organization. Our award-winning applied research discipline helps ensure state-of-the-art thinking at Telcordia, a major source of product differentiation and competitive advantage. Our 350 scientists and engineers apply competencies which include software engineering, database design, mathematics, optical systems, wireless, Internet, computer networks, and systems architecture.





Performance from Experience

For more information about Telcordia Technologies, contact your local account executive, or you can reach us at:

1.800.521.2673 (U.S. and Canada)
+ 1.732.699.5800 (all other countries)
telecom-info@telcordia.com
www.telcordia.com

About Science Applications International Corporation (SAIC)

SAIC is one of the world's leading providers of systems integration, information management, data security, and network solutions. SAIC and its subsidiary, Telcordia Technologies, have an unsurpassed record in helping clients succeed with end-to-end information technology and networking solutions. For more information about SAIC, please call +1.858.826.6000 or visit the SAIC Web site at www.saic.com.

COMMON LANGUAGE is a registered trademark of Telcordia Technologies, Inc.

PLION is a trademark of Telcordia Technologies, Inc.

CORBA is a registered trademark of Object Management Group, Inc.

Java is a trademark of Sun Microsystems, Inc.

Capability Maturity Model is a registered trademark of Carnegie Mellon University.

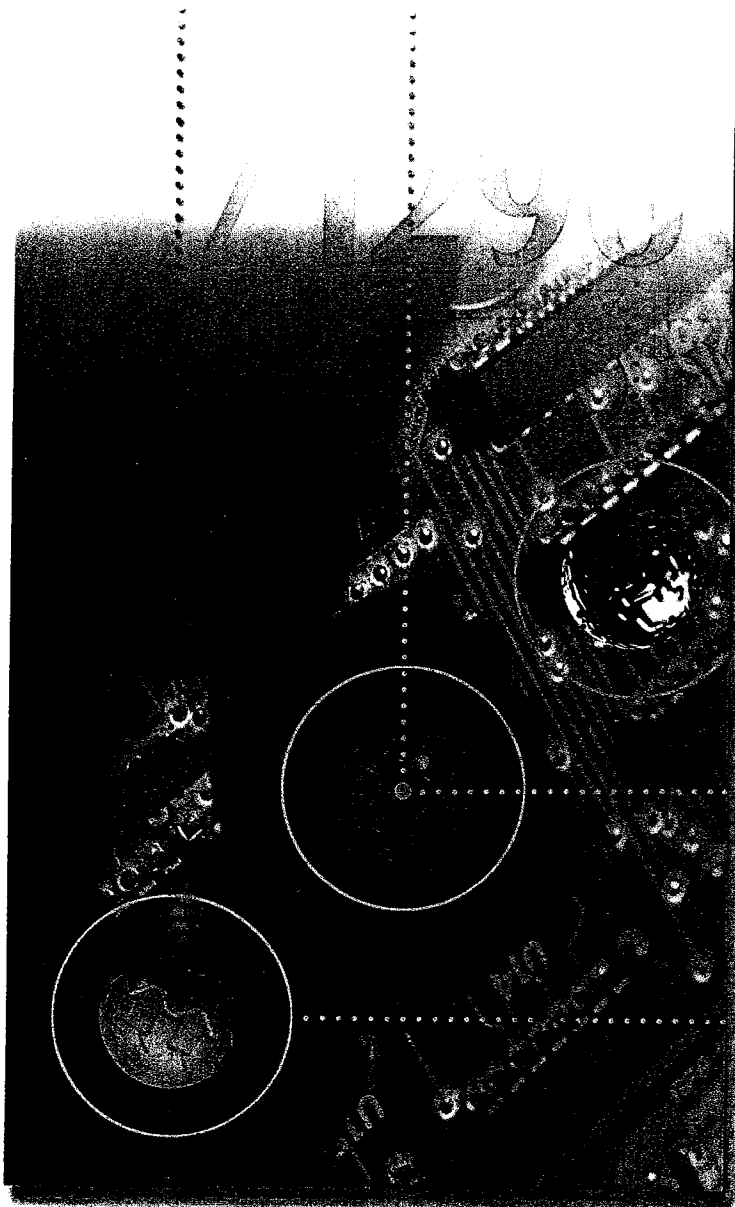
Copyright ©2000 Telcordia Technologies, Inc.
All rights reserved.



Performance from Experience

TELCORDIA™ CENTER FOR NUMBER POOLING ADMINISTRATION

***Telcordia is ready to serve as the Thousands-Block Number Pooling
Administrator for both State Trials and National Implementation***



An SAIC Company

Work with the Numbering Industry Leader

Telcordia experts and our software systems accommodate the unique needs of State Thousands-Block Number Pooling trials, whether planned or underway. We provide States the *opportunity* and *choice* for their selection of a Pooling Administrator. Telcordia brings a reputation of a "world-class" leader in telecommunications that provides support the industry can rely on during this era of tremendous growth.

A History of Numbering Administration Expertise

Telcordia participated in the industry's development of industry-wide guidelines for Thousands-Block Number Pooling Administration and we also have a long track record of building and implementing telecommunications initiatives. We have supported and developed number administration systems since 1984. We are known for reliable, "on-time", and "on-budget" quality products. In addition, our extensive knowledge base and established organizational structure, along with other critical qualifications, positions us as the "first choice" for Pooling Administrator.

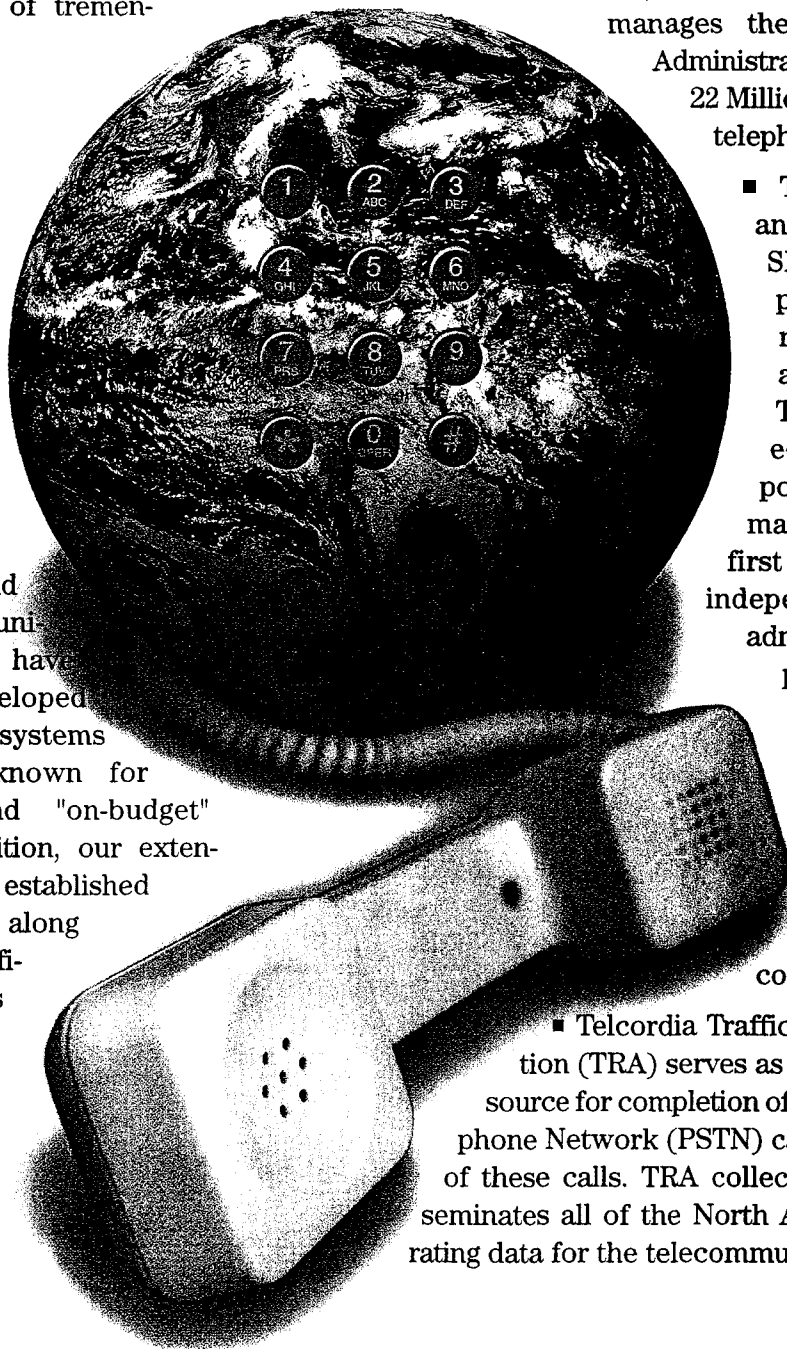
Implement your State Pooling Trial with the Industry's Most Experienced Administrator

- Telcordia served for 14 years as the impartial administrator of North American Numbering Plan (NANP) and continues to participate and lead in industry numbering forums addressing issues, policies, and directions.

- DSMI, a subsidiary of Telcordia, manages the Toll-Free Number Administration System for over 22 Million individually pooled telephone numbers.

- Telcordia developed and deployed the SMS/800® system for processing toll-free numbers in the US and Canada. In 1993, Telcordia implemented toll-free number portability in SMS/800 making SMS/800 the first combined, carrier-independent, number administration, line-level pooling, and portability application in the industry. This system was the cornerstone for the introduction and effectiveness of toll-free numbering competition.

- Telcordia Traffic Routing Administration (TRA) serves as the single recognized source for completion of Public Switched Telephone Network (PSTN) calls and proper rating of these calls. TRA collects, validates and disseminates all of the North American routing and rating data for the telecommunications industry.



■ Telcordia built the software system that SAIC Canada uses for all Central Office (CO) Code Administration and Area Code (NPA) relief functions. This system has been in operation since March 1999. SAIC Canada, a division of our parent company SAIC, is the Canadian Numbering Administrator.

■ Telcordia is the Administrator of SS7 Point Codes, International Mobile Stations Identifiers, and National Business Group Identifiers.

A Reputation in Telecom for Delivering Reliability, Quality & Value

■ NO CALLS DROPPED due to Telcordia software failure in over 7 years of handling 250 Million Toll-Free Calls daily!

■ We hold leadership roles in domestic and international technical committees, forums, and subgroups.

■ No other company has the number of experts, the depth of knowledge or the experience in the industry as our experts' hundreds of years of accumulated numbering expertise.

■ The Telcordia software organization has been ISO9001 certified and has been assessed at Capability Maturity Model® Level 5, an industry standard for measuring software development processes.

What Telcordia Offers As State Pooling Trial Administrator

■ Our neutrality is assured - you can be certain that the Telcordia Center for Number Pooling Administration will perform in a fair manner that conforms with the appropriate industry numbering guidelines.

■ Our technical competency is unmatched - we have a complete understanding of number pooling that won't cost you time spent training an inexperienced provider.

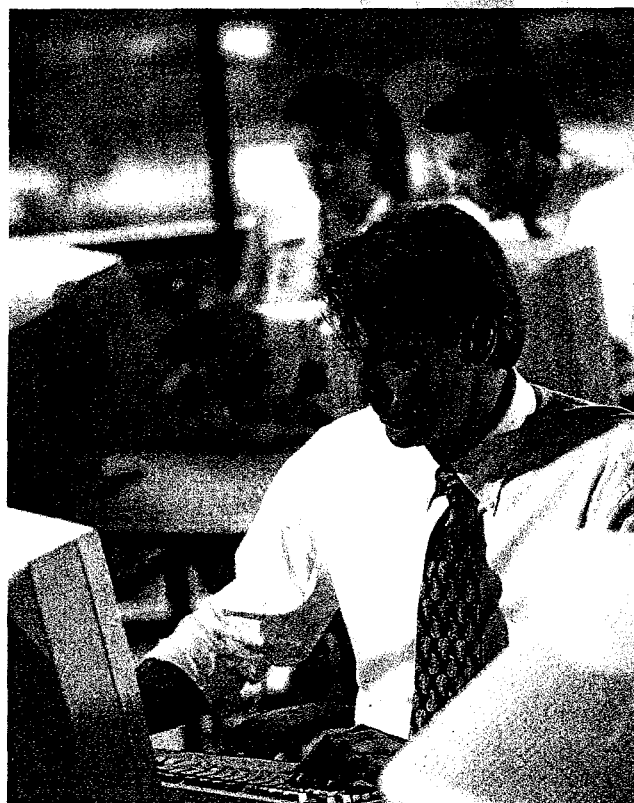
■ Our record of maintaining critical deployment schedules is exemplary.

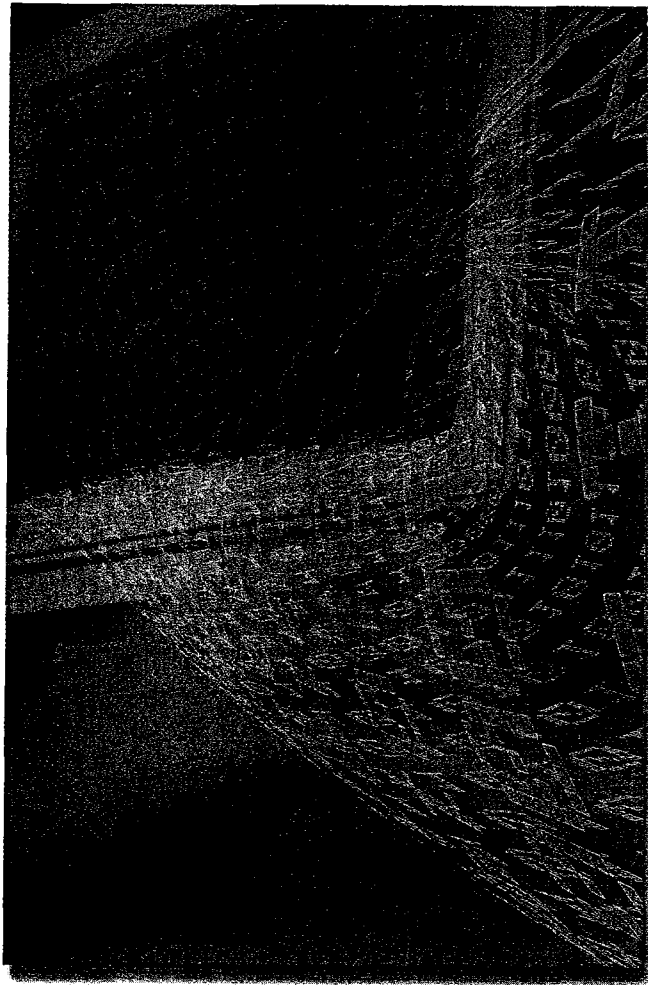
■ We have experienced, flexible staff ready to achieve set goals and accommodate individual states' requirements.

■ Thousands of in-house technical subject matter experts to provide support that is unsurpassed in the industry

■ An administrator that will provide you a better and complete competitive solution

■ A Telcordia-developed system to meet all standards and unique requirements is ready and available now.





Performance from Experience

For more information about
Telcordia Center For Number
Pooling Administration, contact:

1.866.NUM.POOL

<http://www.telcordia.com/TCNPA>

email: TCNPA@telcordia.com

SMS/800 is a registered trademark held by the
Ameritech Operating Companies on behalf of
the Bell Operating Companies (BOCs).
Capability Maturity Model is a registered trademark
of Carnegie Mellon University.
Copyright © 2000 Telcordia Technologies, Inc.
All rights reserved.

About Telcordia Technologies, Inc.

Telcordia Technologies, Inc., an SAIC company, is one of the world's largest providers of operations support systems, network software and consulting and engineering services to the telecommunications industry. The Telcordia software organization, comprised of Operations Support Systems and Service and Business Management Systems, has been ISO 9001-certified and has been assessed at Level 5, the highest level of the Capability Maturity Model®, an industry standard for measuring software development processes that was developed by the Software Engineering Institute at Carnegie Mellon University. A leader in the development of Next Generation Network technologies, Telcordia employs more than 6,500 professionals and has revenues of more than \$1.5 billion. Telcordia (www.telcordia.com) is headquartered in Morristown, New Jersey, US with offices throughout the United States, Europe, Central and South America and Asia Pacific.



Performance from Experience

For more information about Telcordia Technologies, contact your local account executive, or you can reach us at:

1.800.521.2673 (U.S. and Canada)
+ 1.732.699.5800 (all other countries)
telecom-info@telcordia.com
www.telcordia.com

About Science Applications International Corporation (SAIC)

SAIC is one of the world's leading providers of systems integration, information management, data security, and network solutions. SAIC and its subsidiary, Telcordia Technologies, have an unsurpassed record in helping clients succeed with end-to-end information technology and networking solutions. For more information about SAIC, please call +1.858.826.6000 or visit the SAIC Web site at www.saic.com.

Copyright ©2000 Telcordia Technologies, Inc.
All rights reserved.

MC-COR-PF-001



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

RECORDS AND
REPORTING

NOV 14 PM 4:27

RECEIVED-FPSC

DATE: November 14, 2000
TO: Blanca Bayo, Director, Division of Records and Reporting
FROM: Melinda Butler, Assistant to Commissioner Jacobs *MB*
RE: Intercepted Communications From an Interested Person Received in
Numerous Dockets

This office has received the attached letter from Gregory Roberts, Vice President, Numbering Services, NeuStar. The information contained in the letter may apply to Dockets Nos. [REDACTED] 990455, 990456, 990457, and 990517. The correspondence has not been viewed or considered in any way by Commissioner Jacobs. Under the terms of the advisory opinion from the Commission on Ethics (issued July 24, 1991 as COE 91-33-JULY 19, 1991), the letter does not constitute an ex parte communication by virtue of the fact that it was not shown to the Commissioner. Given that it is not an ex parte communication, it does not require dissemination to parties pursuant to the provisions of Section 350.042, Florida Statutes. However; in such cases Commissioner Jacobs has requested that a copy of the correspondence and this memo, as a matter of routine, be placed in the correspondence side of the file in this docket.



www.neustar.com

September 25, 2000

E. Leon Jacobs, Jr.
Commissioner
Florida PSC
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

RECEIVED

OCT 09 2000

FLORIDA PUBLIC SERVICE COMMISSION
Commissioner Jacobs

Dear Commissioner Jacobs,

I am writing to assure you personally of our continued desire and commitment to be the neutral third party administrator for all state number pooling initiatives. NeuStar is the only neutral third party providing thousand block pooling administration in the nation today. We are industry pioneers, administering the first thousand block pooling trials in Illinois' 847 and New York's 212 NPAs, and our pooling administration services have expanded to encompass pooling trials in 6 states and 15 NPAs. And, now, we are in the process of turning up additional trials in another 4 states and 10 NPAs.

Since 1997, NeuStar has been working with the states and service providers to create, refine, and manage effective processes for thousand block pooling administration. This work has centered on building strong ongoing relationships with state regulatory agencies, working directly with commissioners and staff members, as well as the service provider community. Our dedicated team of personnel has attended literally hundreds of state and national pooling meetings and forums, and we are recognized nationwide for our expertise. No other neutral third party administrator has provided this level of commitment to the states and the industry.

We have dedicated and knowledgeable thousand block pooling administration staff, proven systems, and reliable methods and procedures that have been shaped and refined through the daily administration of thousand blocks for the last two years. Our position as the nation's only thousand block pooling administrator is a testimony to our high quality of service.

We have the capacity in place to administer thousand block pooling trials to meet your scheduling needs, today! You can count on NeuStar to meet your requirements as we have done in every other state we are serving.

We stand ready to serve you. If you would like to learn more about NeuStar's pooling administration services, I would like you to contact Barry Bishop, Director of Number Pooling Administration, Tel. 312-706-6255 or barry.bishop@neustar.com.

Sincerely,

Gregory Roberts
Vice President, Numbering Services

NEUSTAR, INC.
1120 Vermont Avenue, N.W.
Suite 550
Washington, DC 20005
Phone 202 533 2600
Fax 202 533 2975

Hong Wang

From: Hong Wang
Sent: Tuesday, December 26, 2000 8:27 AM
To: Kay Flynn
Subject: FW: Bell Subpoena

981444

BELLSUBP.WPD

SUBPOENA.WPD

Kay, attached is the subpoena I have told you about. Stephanie needs it tomorrow. Thanks.

-----Original Message-----

From: Stephanie Cater
Sent: Friday, December 22, 2000 9:58 AM
To: Hong Wang
Cc: Rick Wright; Cheryl Bulecza-Banks
Subject: Bell Subpoena

Attached is the file with the language for the Bell Subpoena. Let me know if you have any questions. Thanks

Tracking:

Recipient
Kay Flynn

Delivery

Delivered: 12/26/00 8:27 AM

Read

Read: 12/26/00 10:03 AM

BellSouth Subpoena

Attorney:

Michael P. Goggin
General Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32301

Pursuant to Florida Public Service Commission Order No. PSC-00-0543-PAA-TP in Docket No. 981444-TP, we request the following information.

- 1) The names of any entities to which BellSouth is reselling telephone numbers in the 561, 904, and 954 area codes.
- 2) Along with the names of these entities, include the entities' addresses, contact person, and telephone number.
- 3) The exchanges in which each entity has telephone numbers, including the range of numbers that each entity is using.
- 4) The amount of numbers that have been given to each reseller as of November 30, 2000.

This information should be provided by January 16, 2000.

CMP ROUTING SLIP

DATE RECEIVED : 12/19/00

RESPOND BY : _____

ASSIGNED TO : _____

RETURN COMPLETED FILE TO: _____

PEER REVIEW

Supervisor : AW

Bureau Chief : ont

D'Haeseleer : ont

Salak : ms

Remarks: Potential language
to subpoena bells
will numbering customers
in order to complete their
numbering system.
I did run this by an
attorney.

STATE OF FLORIDA

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



CAPITAL CIRCLE OFFICE CENTER
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399-0850

Public Service Commission

December 27, 2000

HAND-DELIVERED

Michael P. Goggin
BellSouth Telecommunications, Inc.
150 South Monroe Street, Room 400
Tallahassee, Florida 32301

Re: Docket No. 981444-TP - Number Utilization Study; Investigation into Number Conservation Measures

Dear Mr. Goggin:

Enclosed is a Subpoena Duces Tecum Without Deposition. Also enclosed is a copy of this cover letter. Please sign the copy to indicate receipt of the subpoena.

Feel free to contact me at 413-6770 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "Kay Flynn".

Kay Flynn
Chief, Bureau of Records

Enclosure

cc: Diana Caldwell
Stephanie Cater

Received By

A handwritten signature in black ink, appearing to be "Bobbie Webb".

Date

12-27-00

RECEIVED-FPSC

00 DEC 27 AM 11:44

RECORDS AND
REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Docket No. 981444-TP

Number Utilization Study: Investigation
into Number Conservation Measures.

Subpoena Duces Tecum
Without Deposition

THE STATE OF FLORIDA

TO: Michael P. Goggin, General Attorney, BellSouth Telecommunications, Inc., 150 South Monroe Street,
Room 400, Tallahassee, FL 32301

YOU ARE COMMANDED to appear at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida, on or before Tuesday, January 16, 2001, or at such other time and place as may be mutually agreed upon by counsel, and to have with you at that time and place the following pursuant to Florida Public Service Commission Order No. PSC-00-0543-PAA-TP in Docket No. 981444-TP:

- 1) The names of any entities to which BellSouth is reselling telephone numbers in the 561, 904, and 954 area codes.
- 2) Along with the names of these entities, include the entities' addresses, contact person, and telephone number.
- 3) The exchanges in which each entity has telephone numbers, including the range of numbers that each entity is using.
- 4) The amount of numbers that have been given to each reseller as of November 30, 2000.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to (1) appear as specified, or (2) furnish the records instead of appearing as provided above, or (3) object to this subpoena, you may be in contempt of court. You are subpoenaed by the following attorney, and unless excused from this subpoena by this attorney or the court you shall respond to this subpoena as directed.

DATED on December 27, 2000.

Blanca S. Bayó, Director
Records and Reporting
Florida Public Service Commission

(SEAL)

By: _____
Kay Flynn, Chief of Records

Diana Caldwell
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Attorney for
Florida Public Service Commission

CMP ROUTING SLIP

DATE RECEIVED

: 12/11/00

RESPOND BY

: _____

ASSIGNED TO

: _____

RETURN COMPLETED FILE TO:

PEER REVIEW

Supervisor

: W

Bureau Chief

: ont

D'Haeseleer

: ont

Salak

: ms

Remarks:

Potential language
to subpoena Bell
to sell numbering customers
in order to complete their
numbering review.
I did run this by an
attorney.

BellSouth Subpoena

Attorney:

Michael P. Goggin
General Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32301

Pursuant to Florida Public Service Commission Order No. PSC-00-0543-PAA-TP in Docket No. 981444-TP, we request the following information.

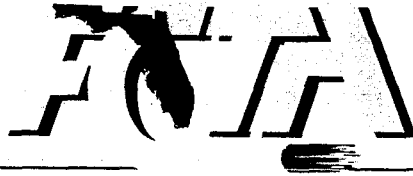
- 1) The names of any entities to which BellSouth is reselling telephone numbers in the 561, 904, and 954 area codes.
- 2) Along with the names of these entities, include the entities' addresses, contact person, and telephone number.
- 3) The exchanges in which each entity has telephone numbers, including the range of numbers that each entity is using.
- 4) The amount of numbers that have been given to each reseller as of November 30, 2000.

This information should be provided by January 16, 2000.

007541

PSC-00-2490-CO-TI

2 pages instead of 20



RECEIVED-FPSC

01 JAN -2 PM 1:10

Florida Cable Telecommunications Association

Steve Wilkerson, President

RECORDS AND
REPORTING

NOTICE FCTA CHANGE OF ADDRESS

TO: ALL PARTIES OF RECORD

FROM: MICHAEL A. GROSS

DATE: DECEMBER 29, 2000

RE: FPSC DOCKET NO. 981444

Please be advised that the **Florida Cable Telecommunications Association (FCTA) headquarters has moved to a new location.** While our phone and fax numbers, as well as e-mail and web site address, will remain the same (see below), our mailing address has changed.

Please note this new information below on all pleadings and correspondence:

Florida Cable Telecommunications Association
246 East 6th Avenue, Suite 100
Tallahassee, Florida 32303
850/681-1990 (tel)
850/681-9676 (fax)
mgross@fcta.com (e-mail)
www.fcta.com (web site)

Done

1/02/01

01 JAN -2 AM 9:13
MAIL ROOM

RAR Official Filing:

1/8/01***12:34 PM*****Matilda Sanders*****1**

Matilda Sanders

0051-PAA

From: Dorothy Menasco
Sent: Monday, January 08, 2001 12:35 PM
To: RAR - Orders-Notices
Cc: Janet Harrison; Della Fordham
Subject: Orders

Sensitivity: Private

The following orders have been transferred to GCOrders for issuance:

Docket No. 001652-WS

File name: 001652a.alc

Atty: Alice

Docket No. 001669-TI

File name: 001669or.dwc

Atty: Diana

Docket No. 981444-TP

File name: 981444or.rb

Atty: Diana

Docket No. 001386-TI

File name: 001386or.dtv

Atty: Tyler

Docket Nos. 001312-TI and 001340-TI

File name: 001312or.dtv

Atty: Tyler

Docket Nos. 001318-TI and 001345-TI

File name: 001318or.dtv

Atty: Tyler

scan copy made

922

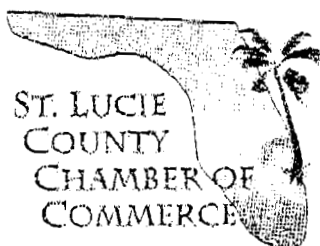
Selfmailed

To: Public Service Commission
Attention: Monte

From: Al Rivett, Executive Vice President

Date: January 22, 2001

Subject: Docket #981444 – Number Utilization/Conservation
Measures for Area Code 561



We would like to be added please as an interested party to the above docket.

Thank you.

added 1-23-01

Telephone: 561-595-9999

2200 Virginia Avenue in Fort Pierce, FL 34982
1626 SE Port St. Lucie Boulevard in Port St. Lucie, FL 34952
Seven Gables House in Fort Pierce

FAX 561-461-9084
FAX 561-335-4446
FAX 561-468-9826

RAR Official Filing:

2/8/01***1:44 PM*****Matilda Sanders*****1**

Matilda Sanders

0358- cd

From: Andrea Cowart
Sent: Thursday, February 08, 2001 1:45 PM
To: RAR - Orders-Notices
Cc: Della Fordham
Subject: Orders

The following orders have been copied to GCORDERS and are ready for issuance.

001669 - 001669co.jae

981444 - 981444co.tv

001209 - 001209.kmp

S

984 self mailers



Legal Department

Sprint PCS

6160 Sprint Parkway, 4th Floor
Overland Park, KS 66251
KSOPHIO414
Voice 913 762 7719
Fax 913 762 0913

March 7, 2001

Dear State Public Service Commission:

NOTICE OF CHANGE OF ADDRESS

Please note that the Regulatory Affairs Department of Sprint Spectrum L.P. d/b/a ("Sprint PCS") a Commercial Mobile Radio Service provider in your State, will change effective Monday, February 26, 2001. The new address will be:

**Sprint PCS
Legal/Regulatory Department
6160 Sprint Parkway, 4th Floor,
KSOPHIO414,
Overland Park, Kansas 66251.**

New contact numbers will be:

**Joseph Assenzo- 913-762-7728
Charles McKee- 913-762-7720
Jeffrey Pfaff- 913-762-7737
Scott Freiermuth- 913-762-7736
Regulatory Affairs Fax 913-762-0913**

Please direct all pleadings and correspondence to the above listed address. If you have any questions, please feel free to contact one of the above listed attorneys. Thank you.

000761, 001503
981444, 990455, 990456
990457, 990517, 000604

RECEIVED AND
RECORDING

01 MAR 19 AM 11:44

RECEIVED-FPSC

01 MAR 13 AM 9:24
MAIL ROOM

Done 3/14/01

I'M MOVING!

RECEIVED-FPSC

FEB 26 AM 10:43

STATE OF FLORIDA

PUBLIC SERVICE ~~COMMISSION~~ RECORDS AND COMMUNICATIONS

ATTN: J. Terry Deason

BUSINESS NAME

2540 SHUMARD OAK BOULEVARD

ADDRESS (Complete Street Address or P O Box or Rural Route and RR Box)

TALLAHASSEE

FLORIDA

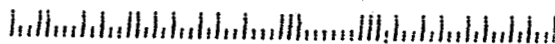
32399-0850

City or Post Office

State

Zip

32399+7019



- ☐ Please REMOVE the name noted below from your mailing list.
☐ Please CHANGE the mailing address for the person receiving your Billing or other Correspondence.
☐ Please CHANGE the mailing address for the person receiving your publication

*****OLD ADDRESS*****

SPRINT PCS
REGULATORY AFFAIRS/ LEGAL DEPT.
MOKCMM1101
4900 MAIN, 11TH FLOOR
KANSAS CITY, MISSOURI 64112

NAME OF PUBLICATION)

City or Post Office

State

Zip

*****NEW ADDRESS*****

SPRINT PCS
REGULATORY AFFAIRS/LEGAL DEPT.
KSOPHIO414
6160 SPRINT PARKWAY, 4TH FLOOR
OVERLAND PARK, KANSAS 66251

New Mailstop Only pertinent business

NEW ADDRESS (Complete Street Address)

City or Post Office

Signature

A-FM20-0429

01 MAR 15 AM 8:35

MAIL ROOM

920260

960100

960786

960833

971478

980495

980986

981444

981831

99054

990649

01 MAR 15 AM 11:35

RECEIVED FPSC

RECORDS AND
REPORTING

991534, 991854

000075, 000121

000690, 010102

Second Notice
December 12, 2000

To Whom It May Concern:

Effective immediately all future correspondence should be addressed to:

Intermedia Communications Inc.
Attn: Scott A. Sapperstein, Sr. Policy Counsel
One Intermedia Way
M.C. FLT-HQ3
Tampa, FL 33647-1752

If you have any questions, please call me at (813) 829-4093.

Sincerely,



Scott A. Sapperstein
Sr. Policy Counsel

SAS/af

gone 3/15/01



June 12, 2001

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Commissioner:

Please update your corresponding information for Cingular Wireless LLC, formerly d/b/a BellSouth Mobility Inc. Our Corporate Headquarters office has moved to the following address:

Cingular Wireless, LLC
5565 Glenridge Connector
Suite 1710
Atlanta, GA 30342 - 4711

Headquarters Contact: Susan Israel
Contact Number: 404-236-5561

Cingular licensees in the state of Florida are: BellSouth Mobility LLC; Florida Cellular Service, LLC; Florida RSA No. 2B (Indiana River) Limited Partnership; Jacksonville MSA Limited Partnership; Orlando CGSA, LLC; Orlando SMSA Limited Partnership; and Florida Cellular Service, LLC.

Sincerely,

Susan Israel
Associate Director -
External Affairs

Done 6/19/01

RECEIVED FPSC
01 JUN 15 PM 2:17
RECORDS AND
REPORTING

960100, 981444
990455
990456
990457
990517

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FAX (202) 424-7645
WWW.SWIDLAW.COM


NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
(212) 973-0111 FAX (212) 891-9598

August 23, 2001

Ms. Hong Wang
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399

Dear Ms. Wang:

A few weeks ago, I exchanged e-mail with some of the commission staff regarding changing the attorney list that the CASR faxes were sent to. My e-mails were forwarded to you and I subsequently spoke with you on the phone. You asked me to put my request in writing and fax it to you. Please make the following changes:

<u>Docket Nos.</u>	<u>Remove</u>	<u>Add</u>
960833	Robin Cohn	Michael Sloan
971478	Richard Rindler	Michael Sloan
990649	Tom Lotterman Russell Blau Marc Rothschild Robert Ridings	Keep Michael Sloan
010960	Jennifer Schneider	Michael Sloan
	Jim Falvey/Rindler	Michael Sloan

If you have any questions about this request, please feel free to call me at (202) 424-7604.

Sincerely,

Celia Petrowsky

Celia Petrowsky
Secretary to Russell Blau

Done 8-23-01

30-413-7118

To: Commission Clerk's
Office

COMMISSION
CLERK

01 OCT 26 PM 3:20

RECEIVED-FPSC

Docket 981444

Please take my fax number
727-725-8466 OFF of
the docket.

I do not want computer
generated faxes to this
number.

Also, please remove the
fax number from dockets
001503 and 010102.

Peggy Arvanitas

Done 10/26/01

Peggy Arvanitas
P.O. Box 8787
Seminole, FL 33775

CCA Official Filing:

12/7/01***10:41 AM*****Matilda Sanders*****1**

Matilda Sanders

2367-PAA

From: Lysa White
Sent: Friday, December 07, 2001 10:14 AM
To: CCA - Orders / Notices; LaSandra Givens
Subject: Order / Notice Submitted

5

Date and Time: 12/7/01 10:14:00 AM
Docket Number: 981444-tp
Filename / Path: i:\981444or.pac

Above order has been efiled.

992 m

CCA Official Filing:

1/2/02***11:51 AM*****Matilda Sanders*****1**

Matilda Sanders

PSC-02- 0010 -Co -TP

From: Andrea Cowart
Sent: Wednesday, January 02, 2002 11:48 AM
To: CCA - Orders / Notices
Subject: Order / Notice Submitted

Date and Time: 1/2/02 11:48:00 AM
Docket Number: 981444-TP
Filename / Path: 981444co.pac

Consummating Order

978m

Hong Wang

From: Ruth Nettles
Sent: Friday, January 11, 2002 9:18 AM
To: Hong Wang
Cc: Nonnye Grant
Subject: FW: New e-mail address for Dave Erwin

I could not print this out for whatever reason. FYI...this is to make changes in our systems on Mr. Erwin's e-mail address.

Thanks.



011073

-----Original Message-----

From: David Erwin [mailto:daveerwin@direcway.com]
Sent: Thursday, January 03, 2002 1:16 PM
To: areburn@a1call.com; BitsofGlitz@webtv.net; Barbara_Lay-A10027@email.mot.com; campbell@rabun.net; bturner@tnonecall.com; bob_lee_jr@compuserve.com; bsfcu@ammi.net; rbkershner@worldnet.att.net; buntydickey@webtv.net; CalhDI@jea.com; mikematt@gate.net; cdudley@bcmpartners.com; christine_burke@frontiercorp.com; CCampbell@gaupc.com; caferguson@pbsj.com; markwag@pol.net; jsj@jsitel.com; drbarrett@att.com; murzin.dave@leg.state.fl.us; Dbuol@aol.com; R M Spiroff@fpl.com; DONH@itstelecom.net; donh@aci-source.net; dseigler@callsunshine.com; Dubo@Iname.com; Elfriede.M@t-online.de; granappl@gate.net; sugarfoot@webtv.net; frankkemp@trafficcontroldevices.com; frankden@ieee.org; GHATHan@gfpac.com; kimen@vbe.com; gandraza@att.com; george@ncocc.org; HammG@dor.state.fl.us; gillbe@sprintmail.com; iheath@valdosta.edu; JANMBEX@aol.com; JEFFL@itstelecom.net; JEFFL@aci-source.net; jimh@itstelecom.net; james.smith@mail.sprint.com; jnovak@callsunshine.com; jlay@CAP.org; johnd@arrowcom.com; John.Galfo@ocfl.net; jpatterson@callsunshine.com; inreconjms@aol.com; jonianne29@yahoo.com; kabobber@yahoo.com; Kenneth.Weldon@DOT.State.FI.US; krishoff@erols.com; Barbara.Lay@motorola.com; wilson-l@mail.tmh.org; Linda.Kavanagh2@bridge.bellsouth.com; sugafoot@gate.net; milosarah@aol.com; jmespey@msn.com; aherncjme@aol.com; zantium@hotmail.com; MARYANNH@itstelecom.net; maryannh@aci-source.net; MONANBILL@aol.com; Paul.Scott@igate.fhwa.dot.gov; rebecca@gte.net; ronaldr@reilyandrosas.com; ryoung@yvvalaw-tal.com; RNettles@PSC.STATE.FL.US; sarah.porter@DOT.state.fl.us; sharon.liebman@bellsouth.com; EESPEY@techdata.com; poms@nettally.com; T-J-Miller@email.msn.com; TLamberson@TLCDiversified.com; tlamberson1@juno.com; tvmcfadden@lga.att.com; tstrong@ccaglaborlaw.com; tba@nettally.com; thomas.mccabe@tdstelecom.com; wilson-v@mail.tmh.org; oneilv@doacs.state.fl.us; jijiweidner@nettally.com; wallacea@ix.netcom.com; wick.heath@infotechfl.com; Vicki & Les; Wbgresham@aol.com
Subject: New e-mail address for Dave Erwin

This is my new e-mail address, effective immediately: daveerwin@direcway.com. The old address will become obsolete on the 11th of January. Thanks. Dave



Updated
7-11-02

July 11, 2002

Public Service Commission
2540 Shurmard Oak Blvd.
Tallahassee, FL 32399-0850

Attention: Nonnye Grant

Dear Ms. Grant:

TX029 + Notice List
NH NR NW "T"

Per our telephone conversation today, please make the following changes for the
FLORIDA PUBLIC TELECOMMUNICATIONS ASSOCIATION:

Please send all mail to:

Old
m/mr. Angela B. Green
Vice President/General Counsel
2292 Wednesday Street, Suite 1
Tallahassee, FL 32308-4334
abgreen@nettally.com

David Tobin, Esq. - General Counsel
Tobin & Reyes
7251 West Palmetto Park Road
Suite 205
Boca Raton, FL 33433 - 3487
Phone: (561) 620-0656
Fax: (561) 620-0657
E-mail: dst@tobinreyes.com

Our second contact is:

pt same as above
P- (850) 222-5050
F- (850) 222-1355

Rick Lubbehusen, Executive Director
Phone: (850) 222-5050
Fax: (850) 222-1355
E-mail: rick@fpta.com

Thank you, Nonnye, for your help. If you need any further information, please let me know.

Sincerely,

Jan McBride-Smith
Office Manager

Gone
7/11/02

Spoke w/ Ms. McBride-Smith, received
titles of contacts, plus they want to
remain on the
NH, NR, NW "T"

new L
1140 Capital Circle SE, Suite 11, Tallahassee, FL 32301 - 3836
Phone (850) 222-5050, Fax (850) 222-1355, Email: jan@fpta.com

TX029

Subscription

September 23, 2002

BY HAND DELIVERY

Blanca Bayó, Director
Florida Public Service Commission
Division of Commission Clerk and
Administrative Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

COMMISSION
CLERK

02 OCT -3 AM 10:05

Re: Change of Address

Dear Ms. Bayó,

In compliance with the Commission rules, WorldCom hereby files its change of contact information for the certificated entities listed below. Starting today, September 23, 2002, I am moving to a new address, and also will have new phone and fax numbers. I would appreciate it if you could update the Master Commission Directory with the new information.

960786, 960786A, 960786B, 960833, 960846,
971140, 971478, 980499, 980986, 981121, 981444,
981834, 990455, 990649, 990649A, 990649B, 0000,
000121, 000121A, 000121B, 000649, 001503, 010774,
011077, 020121,
020649, 020701,
020891

I am the regulatory liaison for the following certificated entities and my new information is set forth below:

UPDATED REGULATORY LIAISON CONTACT INFORMATION:

Donna Canzano McNulty
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301

Phone: (850) 219-1008
Fax: (850) 219-1018

UPDATED CONTACT INFORMATION FOR THESE CERTIFICATED ENTITIES:

- ✓ TI731 - MCI WorldCom Network Services, Inc. (IXC)
- ✓ TE644 - MCI WorldCom Communications, Inc. (PP)
- ✓ TA020 - MCI WorldCom Network Services, Inc. (ALEC)
- ✓ TA005 - MCI metro Access Transmission Services, LLC (ALEC)
- ✓ TS185 - MCI WorldCom Communications, Inc. (STP)
- ✓ TA047 - MCI WorldCom Communications, Inc. (ALEC)
- ✓ TI724 - TransCall America, Inc. d/b/a ATC Long Distance

Done 9/25/02

- ✓ TJ032 – MCI WorldCom Communications, Inc. (IXC)
- ✓ TA012 – Metropolitan Fiber Systems of Florida , Inc. (ALEC)
- ✓ TE165 – Telecom*USA, Inc. (PP)
- ✓ TI906 – Telecom*USA, Inc. (IXC)
- ✓ TI907 – SouthernNet Systems, Inc. (IXC)
- ✓ TS173 – Intermedia Communications Inc. (STP)
- ✓ TI857 – Intermedia Communications Inc. (IXC)
- ✓ TA001 – Intermedia Communications Inc. (ALEC)
- ✓ TS171 - Access Network Services, Inc. (STP)

If you have any questions, please contact me at your earliest convenience.

Sincerely,

Donna Canzano McNulty

cc: Walter D'Haeseleer
Harold McLean
Beth Keating
Bev DeMello
Rick Moses
Roberta Bass

MILLER ISAR INC.

REGULATORY CONSULTANTS

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

~~981834~~
981834

FACSIMILE COVER SHEET

Date: November 19, 2002
To: Hong, Florida Public Service Commission
Facsimile Number: 850.413.7118
From: Anna Brauer
Regarding: Reference Docket No. 981834
No. of Pages including Cover: 1

If there is any difficulty in receiving this transmission or if you have any questions, please call 253.851.6700.

Hong:

The current address for Miller Isar, Inc. is as follows:

7901 Skansie Ave., Suite 240
Gig Harbor, WA 98335

Sorry for the Confusion.

Anna Brauer
Miller Isar, Inc.
253.851.6700

°°°CONFIDENTIALITY NOTICE°°°

This transmittal and accompanying documents are intended only for the use of the individual or entity to which they are addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, the reader is hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone to arrange for the retrieval of these documents. Thank you.

981444

PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A.
ATTORNEYS AT LAW

215 South Monroe Street, Suite 200

Tallahassee, FL 32301

850 / 222-3533

Fax: 850 / 222-2126

KarenCamechis@penningtonlawfirm.com

FACSIMILE TRANSMISSION COVER SHEET

DATE: March 6, 2003

TO: Blanca Bayo

FAX: 413-7118

CLIENT: 08656

FROM: Karen Camechis

COMMENTS/INSTRUCTIONS:

Please see attached.

YOU SHOULD RECEIVE 2 PAGES, INCLUDING THIS COVERSHEET. IF YOU DO NOT
RECEIVE ALL THE PAGES, PLEASE CONTACT :

Brandi Williams, Assistant to Karen Camechis, at (850) 222-3533

CONFIDENTIAL AND PRIVILEGED

The information contained in this facsimile message is legally confidential and privileged information. It is intended only for the use of the person or entity named above. If you receive this message and you are not the intended recipient, you are hereby notified that any copy, dissemination or distribution of this information is prohibited. If you have received this facsimile in error, please notify us immediately by telephone and return the original information to us at the address shown above via U.S. mail.

THANK YOU FOR YOUR CONSIDERATION

PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A.

ATTORNEYS AT LAW

JOAN H. ANDERSON
DOUGLAS S. BELL
SAMUEL P. BELL, III
FREDERICK L. BUSACK
KAREN M. CAMECHIS
KEVIN X. CROWLEY
MARK K. DELEGAL
MARC W. DUNBAR
PETER M. DUNBAR
MARTHA J. EDENFIELD
CYNTHIA SIMMONS FLETCHER
MARK T. HANEY
WILEY HORTON
WILLIAM H. HUGHES, III

KORY J. ICKLER*
KIMBERLY L. KING
STEVEN M. MALONO
EDGAR M. MOORE
E. MURRAY MOORE, JR.
BRIAN A. NEWMAN
JOHN C. PELHAM
CARL R. PENNINGTON, JR., P.A.
GARY A. SHIPMAN
SUSAN K. SPURGEON*
LESLIE G. STREET
MICHAEL J. THOMAS*
CYNTHIA S. TUNNICLIFF
WILLIAM E. WHITNEY
BEN H. WILKINSON

CATHI C. WILKINSON
JULIUS J. ZSCHAU*
OF COUNSEL
ROBERT CINTRON, JR.
R. STUART HUFF, P.A.
Corni Gables, Florida
CHRISTOPHER W. KANAGA*
(Admitted in Massachusetts & Colorado Only)
CHRISTIAN D'RYAN, P.A.

SPECIAL CONSULTANTS

R.Z. SAFLEY*
JAMES E. HARRIS, JR.*
MEREDITH W. SNOWDEN*

*not a member of the Florida Bar
*also admitted in Louisiana
*also admitted in Illinois
*also admitted in Georgia

TALLAHASSEE OFFICE:
215 SOUTH MONROE STREET
2ND FLOOR
TALLAHASSEE, FLORIDA 32301
(850) 222-3533
FAX (850) 222-2126

TAMPA OFFICE:
2701 NORTH ROCKY POINT DRIVE
SUITE 830
TAMPA, FLORIDA 33607
(813) 838-9599
FAX (813) 639-1488

EMAIL: email@penningtonlawfirm.com

REPLY TO:
P.O. BOX 10095
TALLAHASSEE, FL 32302-2095

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

via Facsimile
413-7118

Dear Ms. Bayo:

Please remove Karen M. Camechis off of the following dockets, as I will no longer be representing Time Warner Telecom:

~~000144~~
011077
000121C

000075
000121A
000121B

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

Karen Camechis
Karen M. Camechis

KMC/blw

Done 3/06/03

RECEIVED FPSC
03 MAR - 6 PM 4: 05
COMMISSION
CLERK

Nonnye Grant

From: Mason, Carolyn [Carolyn.Mason@myflorida.com]
Sent: Thursday, August 14, 2003 9:32 AM
To: 'NGRANT@PSC.STATE.FL.US'
Subject: Address/FAX Revisions

981444

Nonnye,

I have moved to a different office in the same building so my suite number and fax number changed:

My new information is as follows:

Ms. Carolyn Mason
DMS State Technology Office
4030 Esplanade Way, Suite 335
Tallahassee, FL 32399-0950

FAX: 850/413-7067

TELEPHONE: 850/922-7503 (Same telephone #)

Please change my mailing address and FAX # on your lists. I receive telecommunications notices, agendas, weekly docket and order reports.

Please confirm that you have received this e-mail and let me know if you have any questions.

Take care,
Carolyn Mason

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-
FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer

DATE: December 18, 2003

TO: Dr. Mary A. Bane, Executive Director

FROM: Beth Salak, Director, Division of Competitive Markets and Enforcement

RE: Request to Review Confidential Documents

DOCUMENT NO. 05539-06

DISTRIBUTION: _____

981444-TP

Please allow Cheryl Bulecza-Banks, Bob Casey, and Stephanie Cater to view the following confidential documents in order to determine whether or not they can be returned to the companies and/or removed from the confidential files.

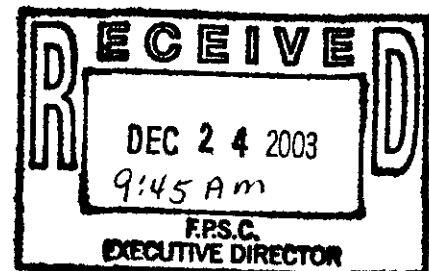
- 07436-01 - filed 6/14/01; described as "Workpapers of numbering review of Arch Wireless/Pagenet."
- 07439-01 - filed 6/14/01; described as "Workpapers of numbering review of Nextel Communications, Inc."
- 10544-01 - filed 8/24/01; described as "Workpapers for numbering review of TCG South Florida, Inc."
- 13771-01 - filed 10/31/01; described as "Workpapers and 1 diskette for AT&T Wireless Services."

If you have any questions or concerns, please contact Stephanie Cater at 413-6429.

BWS/sac

cc: Bob Trapp
Cheryl Bulecza-Banks
Bob Casey
Stephanie Cater

*Approved -
MAB
12/29/03*



State of Florida

**Public Service Commission**
-M-E-M-O-R-A-N-D-U-M-

DATE: February 20, 2004
TO: Parties of Record and Interested Persons in Docket Nos. **981444-TP** (Number Utilization Study: Investigation into Number Conservation Measures) and **020960-TP** (Petition for arbitration of open issues resulting from interconnection negotiations with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad Communications Company)
FROM: Blanca S. Bayó, Commission Clerk & Admin. Svcs. Director, Division of the Commission Clerk & Administrative Services *BSB/14*
RE: Contact Regarding Employment

Section 5.02 C.1.c. of the Commission's Administrative Procedures Manual requires all parties and interested persons in affected dockets to be notified if a staff member involved in any docket indicates he or she has been approached regarding employment by a party in the docket.

As a party or interested person in the dockets referenced above, you are hereby notified that Demetria Watts, Regulatory Analyst III in the Commission's Office of Market Monitoring and Strategic Analysis, has advised the Commission that she was contacted by Verizon regarding employment.

BSB:kf

cc: Mary A. Bane, Executive Director
Kevin Neal, Deputy Executive Director
Rick Melson, General Counsel
Roberta Bass, MMS Chief
Neil Bethea, MMS Supervisor
Demetria Watts

981444-TP

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
LILA A. JABER
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

July 26, 2004

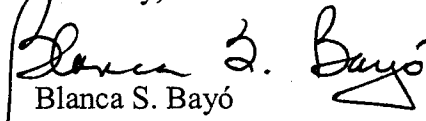
Parties of Record in
Dockets 981444-TP
001503-TP, and
010409-TP

**Re: Reporting Requirement for Employees Exercising Regulatory
Responsibility**

Dear Sir or Madam:

Pursuant to Section 5.02 C.1.b. of the Commission's Administrative Procedures Manual, you are hereby notified that Patricia A. Christensen, Senior Attorney in the Office of General Counsel, has advised the Commission that she was contacted by the Office of Public Counsel regarding her interest in being considered for employment to fill a vacancy in that office.

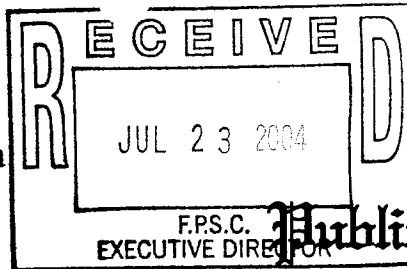
Sincerely,


Blanca S. Bayó

BSB:kf

cc: Mary A. Bane, Executive Director
Richard Melson, General Counsel
Beth Keating, Attorney Supervisor
Patricia Christensen, Senior Attorney

State of Florida



CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

OFFICIAL FILE COPY

DIRECTOR _____

AA _____

ASSIST. DIR _____

ACM _____

HR _____

OS _____

RCH *Ray*

REP _____

OTHER _____

DATE *7/23/04*

FROM *BSB*

Please handle

DATE: July 23, 2004
TO: Mary Andrews Bane, Executive Director
FROM: Richard D. Melson, General Counsel *RDM*
RE: Contact Regarding Employment

Another attorney in my office – Patricia Christensen – recently received a contact from the Office of Public Counsel regarding potential employment by that agency. This is my recommendation under Section 5.02(C)(1)(b) regarding changes in work assignments and/or notification to parties in dockets involving OPC to which Ms. Christensen is assigned.

Ms. Christensen is assigned to the four dockets to which OPC is a party. One of those dockets (Docket No. 030867-TL) is on appeal, and Ms. Christensen does not have any responsibility for the appeal. Three of those dockets are in active or monitor status. I recommend no change in work assignments, but do recommend that notice of the contact be given to the parties to the three active/monitor status dockets:

RECEIVED-PPSC

JUL 23 PM 4:01

COMMISSION
CLERK

Docket No. 981444-TP

Number Utilization Study

Docket No. 001503-TP

Cost recovery and allocation issues for number pooling trials in Florida

Docket No. 010409-TP

Petition by Citizens of Florida for investigation of Talk America, Inc. and its affiliate, The Other Phone Company, Inc. d/b/a Access One Communications, for willful violation of Rule 25-4.118, F.A.C.

I further recommend that the notice simply state that Ms. Christensen “has advised the Commission that she was contacted by the Office of Public Counsel regarding her interest in being considered for employment to fill a vacancy in that office.”

Please let me know if you would like to discuss this recommendation.

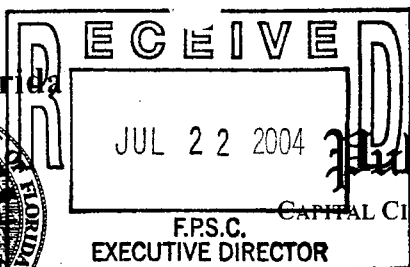
7/23/04

RDM:mee

Blanca, please process the Notice of Contact as recommended by Mr. Melson in this memorandum.

h MAB

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 22, 2004
TO: Richard D. Melson, General Counsel
Mary Andrews Bane, Executive Director
FROM: Patricia A. Christensen, Senior Attorney, General Counsel *PAC*
RE: Contact Regarding Employment, Section 5.02(c), Administrative Procedures Manual

On July 22, 2004, I received a contact regarding employment within the meaning and intent of Section 5.02(c), Administrative Procedures Manual, from Harold McLean, Office of the Public Counsel.

cc: Beth Keating, Supervising Attorney, CME

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

MEMORANDUM

TO: FPSC Clerk's Office
FROM: Pat Pottle
RE: Fax Number for Lee L. Willis and James D. Beasley
DATE: February 21, 2005

981444
020233
030944
031033
040033
040086
041103
041143
041300
041375
041376
041408
050001
050002
050007
050058

I would like to request that you change, in all instances, the fax number for Lee L. Willis and James D. Beasley from 222-7560 to 222-7952.

Thank you for your assistance.

Done
02/23/05
in
KMP

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9227)

Susan Israel, Associate Director
Cingular Wireless - External Affairs
5565 Glenridge Connector, 17th Floor
Atlanta, Georgia 30342

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Israel:

Commission staff have advised that Confidential Document No. 13644-99, filed on behalf of Cingular Wireless can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script that reads "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9234)

Beverly Y. Menard, Assistant Vice President
GTE Service Corporation - Regulatory & Governmental Affairs
One Tampa City Center
FLTC0616
Tampa, Florida 33601-0110

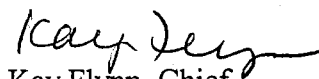
Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Menard:

Commission staff have advised that Confidential Document No. 13674-99, filed on behalf of GTE Wireless can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,


Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9241)

Mr. John Manning
NeuStar, Inc.
1120 Vermont Avenue, Northwest, Suite 550
Washington, D.C. 20005

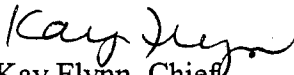
Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Manning:

Commission staff have advised that Confidential Document No. 14395-00, filed on behalf of NeuStar can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,


Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9203)

Laura L. Holloway, Director
Nextel Communications, Inc. - Government Affairs
2001 Edmund Halley Drive
Reston, Virginia 20191-3421

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Holloway:

Commission staff have advised that Confidential Document No. 05768-01, filed on behalf of Nextel Communications, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script that reads "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9203)

Laura L. Holloway, Director
Nextel Communications, Inc. - Government Affairs
2001 Edmund Halley Drive
Reston, Virginia 20191-3421

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Holloway:

Commission staff
Nextel Communication

Please do not hes
material.

SENDER COMPLETION SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to: **05768-01**

LAURA L HOLLOWAY DIRECTOR
NEXTEL COMMUNICATIONS - GOVT AFFAIRS
2001 EDMUND HALLEY DR
RESTON VA 20191-3421

RECEIVER COMPLETION SECTION

A. Received by (Please Print Clearly) **EXCEL** B. Date of Delivery **3-16-05**

C. Signature **EXCEL** ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number **7002 0860 0001 1760 9203**
(Transfer from service label)

PS Form 3811, March 2001

Domestic Return Receipt

102505-01-M-1424

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Charles J. Rehwinkel, Esquire
Sprint
Post Office Box 2214
Tallahassee, Florida 32316-2214

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Rehwinkel:

Commission staff have advised that Confidential Document No. 06589-00, filed on behalf of Sprint-Florida, Incorporated can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF/mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY

A handwritten signature in black ink, appearing to read "C. J. Rehwinkel".

DATE

4-22-05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9210)

Benjamin H. Dickens, Jr., Esquire
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, Northwest, Suite 300
Washington, D.C. 20037

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Dickens:

Commission staff have advised that Confidential Document No. 05232-00, filed on behalf of Omnipoint Communications MB Operations, LLC can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9197)

Mike Brantley, Vice President
Arch Wireless - Telephone Industry Relations
1800 West Park Drive, Suite 250
Westborough, Massachusetts 01581

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Brantley:

Commission staff have advised that Confidential Document No. 03862-01, filed on behalf of Arch Wireless, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9197)

Mike Brantley, Vice President
Arch Wireless - Telephone Industry Relations
1800 West Park Drive, Suite 250
Westborough, Massachusetts 01581

FPSC, CLK - CORRESPONDENCE
☒ Administrative ☐ Parties ☐ Consumer
DOCUMENT NO. 0SS39-06
DISTRIBUTION: CMP; GCL

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Brantley:

Commission:
Arch Wireless, Inc.

Please do not
material.

ORDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.		A. Received by (Please Print Clearly) <i>J. Connolly</i>	B. Date of Delivery <i>3/16/05</i>
1. Article Addressed to: <i>03862-01</i>		C. Signature <i>J. Connolly</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
2. Article Number (Transfer from service label)		D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
MIKE BRANTLEY VICE PRESIDENT ARCH WIRELESS - TELEPHONE INDUSTRY REL 1800 W PARK DR STE 250 WESTBOROUGH MA 01581		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
		7002 0860 0001 1760 9197	

KF:mhl
Enclosure

cc: Catherine S. Be

Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, Florida 32302-1876

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Self:

Commission staff have advised that Confidential Document No. 05476-01, filed on behalf of AT&T Wireless Services, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

14
Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

M. H. (Heron)

DATE 3/17/05

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, Florida 32302-1876

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Self:

Commission staff have advised that Confidential Document No. 04794-00, filed on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A handwritten signature in black ink, appearing to read "M. Heron".

(Heron)

DATE 3/14/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

FPSC, CLK - CORRESPONDENCE
Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. Sims:

Commission staff have advised that Confidential Document Nos. 14067-99, 05283-00, 06188-00, 10123-00, 10221-00, 10624-00, 11779-00, 12524-00, 14078-00, 14547-00, 01691-01, and 01998-01, filed on behalf of BellSouth Telecommunications, Inc. can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to be "KF".

Kay Flynn, Chief
Bureau of Records

KF/mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A large, stylized handwritten signature in black ink, possibly reading "P. [unclear]".

DATE

3/22/05

①

RECEIVED-FPSC

Legal Department

MICHAEL P. GOGGIN
General Attorney

00 AUG 21 PM 12:57

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

RECORDS AND
REPORTING

August 21, 2000

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 981444-TP

Dear Ms. Bayo:

Enclosed is additional information that was inadvertently omitted from BellSouth Telecommunications, Inc.'s ("BellSouth's") response filed on August 18, 2000 to Staff's August 14, 2000 letter relating to BellSouth's Motion for Variance in this matter.

The information provided in this response includes information that is proprietary and BellSouth requests that it be treated as confidential pursuant to Rule 25-22.006. This information includes vendor specific and confidential business information.

Sincerely,

Michael P. Goggin
Michael P. Goggin

MPG/vf
Enclosures

Cc: Diana W. Caldwell (via Hand-Delivery)
Levent Ileri (via Hand-Delivery)

*7/06
(original ltr. was in dkt file
as reference; ltr. + conf
DN not stamped
separately) MHR*

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 10221-00. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10221 AUG 21 8

FPSC-RECORDS/REPORTING

(2)

RECEIVED-FPSC



BellSouth Telecommunications, Inc.
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301

850 222-1201
Fax 850 222-8640

00 AUG 28 PM 4:42

RECORDS AND
REPORTING

Nancy H. Sims
Director - Regulatory Relations

January 24, 2000

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket No. 981444-TP

Dear Ms. Bayo:

Enclosed is additional information that was inadvertently omitted from BellSouth Telecommunications, Inc.'s (BellSouth's) response filed on August 18, 2000 to Staff's August 14, 2000 letter relating to BellSouth's Motion for Variance in this matter.

The information provided in this response includes information that is proprietary and BellSouth requests that it be treated as confidential pursuant to Rule 25-22.006. This information includes vendor specific and confidential business information.

Sincerely,

Nancy H. Sims

(2P)

cc: Diana W. Caldwell
Levent Ileri

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 10624-00. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

7/06
original
(ltr. was in
dkt file as
reference.)

RECEIVED & FILED

ltr + conf DN

FPSC BUREAU OF RECORDS

not stamped

separately

(See DNs 10123-00
10221-00)

DOCUMENT NUMBER-DATE

10624 AUG 28 8

FPSC-RECORDS/REPORTING

ORIGINAL
RECEIVED-FPSC **BELLSOUTH**

00 NOV -9 PM 4:43

BellSouth Telecommunications, Inc. 850 224-5139
Suite 400 Fax 850 222-8640
150 South Monroe Street
Tallahassee, Florida 32301

Stan L. Greer
Manager - Regulatory Relations

RECORDS AND
REPORTING

November 9, 2000

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 981444-TP

Dear Ms. Bayo:

Enclosed is the additional information that staff requested at the November 6, 2000 meeting concerning the capabilities of the IAESS switches.

The information provided in this response includes information that is proprietary and BellSouth requests that it be treated as confidential pursuant to Rule 25-22.006. This information includes confidential switch specific information.

Sincerely,

Stan L. Greer
Stan L. Greer

7/06.
(original ltr. was in dkt file
as reference; ltr. + conf DN
not stamped separately.)
[Signature]

APP _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
LEG _____
OPC _____
PAI _____
RGO _____
SEC _____
SER _____
OTH _____

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 14547-00. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

RECEIVED & FILED

[Signature]
FEDERAL BUREAU OF RECORDS

RAR note: 15 copies of Confidential were provided. Per Stan Greer, all extra copies of Confidential can be shredded.

DOCUMENT NUMBER-DATE

145471 NOV -98

FPSC-RECORDS/REPORTING

(4)

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Rhonda P. Merritt, Esquire
AT&T
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Merritt:

Commission staff have advised that Confidential Document No. 03381-01, filed on behalf of AT&T Communications of the Southern States, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A handwritten signature in cursive script, appearing to read "Tracy Dotts".

DATE

3/25/05

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Kenneth Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Mr. Hoffman:

Commission staff have advised that Confidential Document Nos. 05264-00 and 06186-00, filed on behalf of Allegiance Telecom of Florida, Inc. can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY

A handwritten signature in black ink, appearing to read "Carissa Burgett".

DATE

4/8/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Kenneth Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Hoffman:

Commission staff have advised that Confidential Document No. 13526-99, filed on behalf of Aerial Communications, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

14
Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY Carissa Burgett DATE 4/8/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

Kenneth Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Hoffman:

Commission staff have advised that Confidential Document No. 13524-99, filed on behalf of Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY Carissa Burgett DATE 4/8/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9470)

Robin Norton
Technologies Management Inc.
210 North Park Avenue
Winter Park, Florida 32789

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Norton:

Commission staff have advised that Confidential Document No. 13008-99, filed on behalf of Global Naps, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script that reads "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF/mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9487)

Monica M. Barone, Esquire
Sprint
3100 Cumberland Circle
Atlanta, Georgia 30339

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Barone:

Commission staff have advised that Confidential Document No. 04488-99, filed on behalf of Sprint Communications Company Limited Partnership can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9494)

Ms. Laura L. Holloway
Director of Governmental Affairs
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, Virginia 20191-3421

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Holloway:

Commission staff have advised that Confidential Document No. 13351-99, filed on behalf of Nextel Communications, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9500)

Ms. Jean Houck
ITC^DeltaCom
7037 Old Madison Pike, Suite 400
Huntsville, Alabama 35806-2107

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. Houck:

Commission staff have advised that Confidential Document Nos. 13672-99 and 05575-00, filed on behalf of ITC^DeltaCom can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script that reads "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES

BLANCA S. BAYÓ

DIRECTOR

(850) 413-6770 (CLERK)

(850) 413-6330 (ADMIN)

PPSC, CLR - CORRESPONDENCE

✓ Administrative Parties Consumer

Public Service Commission

DOCUMENT NO. 05539-06

DISTRIBUTION: CMP, GCL

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9500)

Ms. Jean Houck
ITC^DeltaCom
7037 Old Madison Pike, Suite 400
Huntsville, Alabama 35806-2107

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. Houck:

Commission staff have advised that Confidential Document Nos. 13672-99 and 05575-00, filed on behalf of ITC^DeltaCom can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Received by (Please Print Clearly) <u>Stephanie Bell</u> B. Date of Delivery <u>4-25-05</u></p> <p>C. Signature <u>Stephanie Bell</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input checked="" type="checkbox"/> Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>MS JEAN HOUCK ITC^DELTACOM 7037 OLD MADISON PIKE STE 400 HUNTSVILLE AL 35806-2107</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7002 0860 0001 1760 9500</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9517)

Beverly Y. Menard, Assistant Vice President
GTE - Regulatory & Governmental Affairs
One Tampa City Center
FLTC0616
Tampa, Florida 33601-0110

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Menard:

Commission staff have advised that Confidential Document No. 00462-00, filed on behalf of GTE Wireless can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, Florida 32302-1876

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Self:

Commission staff have advised that Confidential Document No. 05393-00, filed on behalf of MCI WorldCom can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "KF" or "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A handwritten signature in black ink, appearing to read "J. Self".

DATE

4/21/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, Florida 32302-1876

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Mr. Self:

Commission staff have advised that Confidential Document Nos. 04897-99, 13945-99, and 05387-00, filed on behalf of AT&T Communications of the Southern States, for itself and its affiliate AT&T Wireless Services can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A handwritten signature in black ink, appearing to read "J. Self".

DATE

4/21/05

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, Florida 32302-1876

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Self:

Commission staff have advised that Confidential Document No. 05390-00, filed on behalf of e.spire can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED

A handwritten signature in black ink, appearing to read "J. Self".

DATE

4/21/05

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556


Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. Sims:

Commission staff have advised that Confidential Document Nos. 13163-99 and 13676-99, filed on behalf of BellSouth Telecommunications, Inc. can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

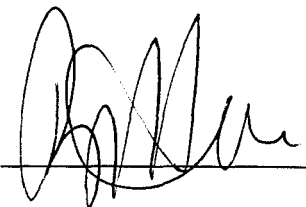
Sincerely,


Kay Flynn, Chief
Bureau of Records

KF/mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED



DATE

4/21/05

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Kenneth Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Mr. Hoffman:

Commission staff have advised that Confidential Document No. 12653-99, filed on behalf of Aerial Communications, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

Kay
Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY

A handwritten signature in cursive script, appearing to read "Cathleen H. H. H.", written over a horizontal line.

DATE

3:45 pm 6/30/05

STATE OF FLORIDA

COMMISSIONERS:

BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Kenneth Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Mr. Hoffman:

Commission staff have advised that Confidential Document Nos. 04870-99, 05796-99, and 12655-99, filed on behalf of Omnipoint Communications MB Operations, LLC (d/b/a Omnipoint Communications) can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to be "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY

A handwritten signature in black ink, appearing to be "Cadel".

DATE

3:45 pm 6/30/05

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

Donna Canzano McNulty, Esquire
1203 Governors Square Boulevard, Suite 201
Tallahassee, Florida 32301-2960

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. McNulty:

Commission staff have advised that Confidential Document Nos. 04501-99 and 12546-99, filed on behalf of MCI Metro Access Transmission Services, Inc., WorldCom Technologies, Inc., and MCI WorldCom can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SIGNED FOR BY

A handwritten signature in cursive script, appearing to read "Donna C. McNulty".

DATE

8.2.05

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

August 1, 2005

(CERTIFIED MAIL NO. 7004-1160-0004-5750-6172)

Kerri L. Barsh, Esquire
Greenberg Traurig, P.A.
1221 Brickell Avenue
Miami, Florida 33131-3224

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Barsh:

Commission staff have advised that Document No. 05261-00, filed on behalf of NEXTLINK Florida, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



CAPITAL CIRCLE OFFICE CENTER
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399-0850

Public Service Commission

April 21, 2005

Karen Walker, Esquire
Holland Law Firm
Post Office Box 810
Tallahassee, Florida 32302


Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Walker:

Commission staff have advised that Confidential Document No. 12661-99, filed on behalf of BMI can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

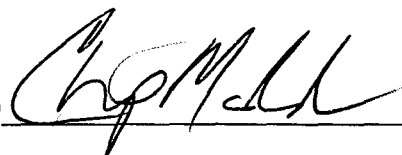
Sincerely,


Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

RECEIVED



DATE

Aug 15, 2005

Chip Madden

RUTLEDGE, ECENIA, PURNELL & HOFFMAN, P.A.
215 SOUTH MONROE STREET
SUITE 420
TALLAHASSEE, FLORIDA 32301

PHONE: (850) 681-6788 FAX: (850) 681-6515

THE INFORMATION CONTAINED IN THIS FAX TRANSMISSION IS ATTORNEY COMMUNICATION AND PRIVILEGED. IT IS INTENDED ONLY FOR THE USE OF THE ADDRESSEE. IF YOU RECEIVED THIS COMMUNICATION AND ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT THE COPYING OR DISTRIBUTION OF THIS COMMUNICATION IS PROHIBITED. IF YOU RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS.

981444

Date: March 17, 2006 From: Kenneth A. Hoffman, Esq.

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

Telecopier Number: () 413-7118

ATTENTION:

Name: Ruth Nettles

Company: FPSC Clerk's Office

ADDRESS: _____

COMMENTS: Wireless One was sold to AT&T five or six years ago. We have no information regarding them.

WE ARE TRANSMITTING 1 PAGES INCLUDING THIS COVER SHEET.
IF YOU DO NOT RECEIVE ALL THE PAGES IN LEGIBLE FORM, CALL (850) 681-6788.

THIS FAX WAS SENT BY: Roxanne Levingston

fax sent due to returned mail from company, R. J. H.

****CCA OFFICIAL DOCUMENT...**b>**

Kimberley Pena

981444

From: joan.gage@verizon.com
Sent: Monday, March 20, 2006 11:24 AM
To: Ruth Nettles
Cc: Kimberley Pena; terry.scobie@verizon.com
Subject: RE: Verizon address change

Thanks Ruth. Please also add the following internal company mail code.

FLTC0007 - added 4/6/06
uf

This can go anywhere on the label.

Joan
813-483-2530 office
813-417-6600 cell
Verizon Florida
Public Affairs - Policy and Communication

"Ruth Nettles"
<RNettles@psc.state.fl.us>

To

Joan M.

03/20/2006 08:19 AM

Gage/EMPL/FL/Verizon@VZNotes

cc

"Kimberley Pena"
<KPena@psc.state.fl.us>

Subject

RE: Verizon address change

Thank you very much for your quick response. I will updated Docket 981444 per your email. I will also remail the information returned by the Post Office to this address.

Ruth Nettles

Done
04/06/06
KMP

****CCA OFFICIAL DOCUMENT...****

-----Original Message-----

From: joan.gage@verizon.com [mailto:joan.gage@verizon.com]

Sent: Friday, March 17, 2006 4:05 PM

To: Records Clerk

Cc: terry.scobie@verizon.com

Subject: Verizon address change

Ruth asked me to send an email with Verkizon Florida's current address.

Her request was with respect to Docket No. 981444.

Please update your records to reflect that the Verizon Florida address is the following:

P.O. Box 110

Tampa, Florida 33601

Thank you.

Joan

813-483-2530 office

813-417-6600 cell

Verizon Florida

Public Affairs - Policy and Communication

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9234)

Beverly Y. Menard, Assistant Vice President
GTE Service Corporation - Regulatory & Governmental Affairs
One Tampa City Center
FLTC0616
Tampa, Florida 33601-0110

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Menard:

Commission staff have advised that Confidential Document No. 13674-99, filed on behalf of GTE Wireless can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material

SENDER INFORMATION		RECIPIENT INFORMATION	
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.		<p>A. Received by (Please Print Clearly) <u>LAUREL HOFF</u></p> <p>B. Date of Delivery <u>MAR 18 2005</u></p> <p>C. Signature <u>[Signature]</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>	
1. Article Addressed to: BEVERLY Y MENARD ASST VICE PRESIDENT GTE SERVICE CORP - REGULATORY GOVT AFF ONE TAMPA CITY CENTER FLTC0616 TAMPA FL 33601-0110		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label) PS Form 3811, March 2001		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
		7002 0860 0001 1760 9234	

Domestic Return Receipt 10899-01-M-1424

KF:mhl
Enclosu

cc: Catl
Che
Bot
Jarr
Jerc

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9210)

Benjamin H. Dickens, Jr., Esquire
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, Northwest, Suite 300
Washington, D.C. 20037

FPSC, CLK - CORRESPONDENCE
Administrative Parties Consumer
DOCUMENT NO. OSS 39-06
DISTRIBUTION:

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Dickens:

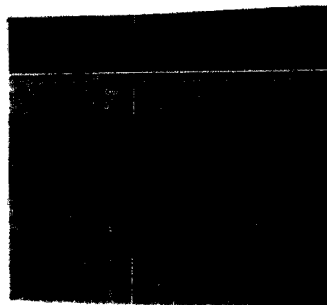
Commission staff have advised that Confidential Document No. 05232-00, filed on behalf of Omnipoint Communications MB Operations, LLC can be returned to the source. The document is enclosed.

PI materia of this

<p>SENDER COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>RECIPIENT COMPLETE THIS SECTION</p>	
<p>1. Article Addressed to:</p> <p>BENJAMIN H DICKENS JR ESQUIRE BLOOSTON MORDKOFSKY JACKSON & DICKENS 2120 L ST NW STE 300 WASHINGTON DC 20037</p>		<p>A. Received by (Please Print Clearly) <u>ALTHEA B. PIERCE</u> B. Date of Delivery <u>3/17</u></p> <p>C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7002 0860 0001 1760 9210</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, March 2001</p>		<p>Domestic Return Receipt 10896-01-M-1424</p>	

KF:mh
Enclos
cc: Cat
Ch
Bol
Jan
Jere

981444-TP



FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 055 39-06
DISTRIBUTION:

CERTIFIED MAIL



7002 0860 0001 1760 9241



SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
~~MR JOHN MANNING
NEUSTAR INC
1120 VERMONT AVE NW STE 550
WASHINGTON DC 20005~~

2. Article Number
(Transfer from service label)
7002 0860 0001 1760 9241

PS Form 3811, March 2001

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____ B. Date of Delivery _____

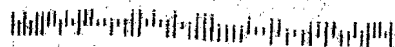
C. Signature _____
☒ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below: _____

3. Service Type
☒ Certified Mail
☐ Registered
☐ Insured Mail
☐ C.O.D.
☐ Express Mail
☒ Return Receipt for Merchandise
☐ Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt
102885-01/M-1424

MR JOHN MANNING
NEUSTAR INC
1120 VERMONT AVE NW STE 550
WASHINGTON DC 20005



①

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

March 14, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9241)

Mr. John Manning
NeuStar, Inc.
1120 Vermont Avenue, Northwest, Suite 550
Washington, D.C. 20005


Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Manning:

Commission staff have advised that Confidential Document No. 14395-00, filed on behalf of NeuStar can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,


Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

2

STATE OF FLORIDA

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



DIVISION OF COMPETITIVE SERVICES
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

October 12, 2000

John Manning
NeuStar, Inc.
NANPA
CO Code Administration
1120 Vermont Avenue, N.W., Suite 550
Washington, D.C. 20005

Re: Access to Carrier-Specific Number Utilization and Forecast Data

Dear Mr. Manning:

In its Numbering Resource Order, the Federal Communications Commission has ordered that reporting carriers provide number utilization and forecast data to the North American Numbering Plan Administrator (NANPA) semiannually. The FCC required that all reporting carriers file their first report no later than August 1, 2000. That time frame was subsequently changed to September 15, 2000. In addition, the FCC granted state commissions access to the information reported to NANPA, provided that the state commissions have appropriate protections in place to preclude disclosure.

Prior to obtaining access to the reported data, NeuStar indicated that state commissions must certify, in writing, that appropriate state laws and regulations are in place to safeguard confidential service-provider data from disclosure. To that end, please be advised that appropriate protections exist under Florida law to safeguard confidential and proprietary information from disclosure.


It is my understanding that these documents will be provided to us on a regular basis, at no cost.

3

John Manning
Page 2
October 12, 2000

I have asked Robert J. Casey, Supervisor of Competitive Industry Practices, Bureau of Competitive Safeguards, to continue overseeing numbering matters and to work with NeuStar to obtain the reported information on behalf of the Florida Public Service Commission as soon as that information is available.

Sincerely,



Walter D'Haeseleer
Director

WD/lkf

cc: Beth Salak, Assistant Director, Division of Competitive Services
Cheryl R. Bulecza-Banks, Chief, Bureau of Competitive Safeguards
Robert J. Casey, Supervisor, Competitive Industry Practices Section
Brent Struthers, Neustar, Inc.

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9500)

Ms. Jean Houck
ITC^DeltaCom
7037 Old Madison Pike, Suite 400
Huntsville, Alabama 35806-2107

FPSC, CLK - CORRESPONDENCE
Administrative Parties Consumer
DOCUMENT NO. OSS 39-06
DISTRIBUTION: _____

Re: Return of Confidential Documents to the Source, Docket No. 981444-TP

Dear Ms. Houck:

Commission staff have advised that Confidential Document Nos. 13672-99 and 05575-00, filed on behalf of ITC^DeltaCom can be returned to the source. The documents are enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

KF:mhl
Enclosure

cc: Cather
Chery
Bob C
Della
James
Jerem

<p>GENERAL COMPLETION INSTRUCTIONS</p> <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>DELIVERY ADDRESS AND SERVICE TYPE</p> <p>A. Received by (Please Print Clearly) <u>Stephanie Bell</u> B. Date of Delivery <u>4-25-05</u></p> <p>C. Signature <u>Stephanie Bell</u> Agent <input type="checkbox"/> Addressee <input checked="" type="checkbox"/></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below: _____</p>	
<p>1. Article Addressed to:</p> <p>MS JEAN HOUCK ITC^DELTACOM 7037 OLD MADISON PIKE STE 400 HUNTSVILLE AL 35806-2107</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7002 0860 0001 1760 9500</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

PS Form 3811, March 2001

Domestic Return Receipt

102505-01-M-1424

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9494)

Ms. Laura L. Holloway
Director of Governmental Affairs
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, Virginia 20191-3421

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Holloway:

Commission staff have advised that Confidential Document No. 13351-99, filed on behalf of Nextel Communications, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

SENDER COMPLETE THIS SECTION		ADDRESSEE COMPLETE THIS SECTION	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Received by (Please Print Clearly)	B. Date of Delivery 4/21/05
1. Article Addressed to: MS LAURA L HOLLOWAY DIRECTOR OF GOVERNMENTAL AFFAIRS NEXTEL COMMUNICATIONS INC 2001 EDMUND HALLEY DR RESTON VA 20191-3421		C. Signature X	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Transfer from service label)		7002 0860 0001 1760 9494	
PS Form 3811, March 2001		Domestic Return Receipt	
		102905-01-M-1424	

KF:mhl
Enclosure

cc: Catheri
Cheryl
Bob C
Della F
James
Jeremy

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9470)

Robin Norton
Technologies Management Inc.
210 North Park Avenue
Winter Park, Florida 32789

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Norton:

Commission staff have advised that Confidential Document No. 13008-99, filed on behalf of Global Naps, Inc. can be returned to the source. The document is enclosed.

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ROBIN NORTON
TECHNOLOGIES MANAGEMENT INC
210 N PARK AVE
WINTER PARK FL 32789

2. Article Number (Transfer from service label)

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

A. Received by (Please Print Clearly) B. Date of Delivery

R. Shahpeen 4/25/05

C. Signature

X [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

of this material

KF/mhl
Enclosure

cc: Cath
Che
Bob

PS Form 3811, March 2001 Domestic Return Receipt 102505-01-M-1424

Della Fordham, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9487)

Monica M. Barone, Esquire
Sprint
3100 Cumberland Circle
Atlanta, Georgia 30339

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION:

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Barone:

Commission staff have advised that Confidential Document No. 04488-99, filed on behalf of Sprint Communications Company Limited Partnership can be returned to the source. The document is enclosed.

P of this
material:

- RECIPIENT COMPLETE THIS SECTION
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired:
 - Print your name and address on the reverse so that we can return the card to you.
 - Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MONICA M BARONE ESQUIRE
SPRINT
3100 CUMBERLAND CIR
ATLANTA GA 30339

KF:mh
Enclos

cc: Cat

Ch 2. Article Number 7002 0860 0001 1760 9487
Bol (Transfer from service label)

De PS Form 3811, March 2001

Domestic Return Receipt

102905-01-M-1424

James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

DELIVER TO THE ADDRESSEE ONLY

A. Received by (Please Print Name) *Wanda* Date of Delivery *APR 25 2005*

C. Signature *Wanda* ☒ Sent ☐ Return Receipt

D. Is delivery address different from item 1? ☒ Yes ☐ No
If YES, enter delivery address below

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYO
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

April 21, 2005

(CERTIFIED MAIL NO. 7002-0860-0001-1760-9517)

Beverly Y. Menard, Assistant Vice President
GTE - Regulatory & Governmental Affairs
One Tampa City Center
FLTC0616
Tampa, Florida 33601-0110

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Menard:

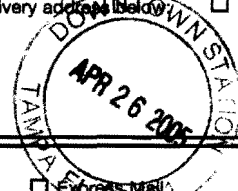
Commission staff have advised that Confidential Document No. 00462-00, filed on behalf of GTE Wireless can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

SENDER, COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Received by (Please Print Clearly) <u>KARL HYTE</u> B. Date of Delivery</p>	
<p>1. Article Addressed to:</p> <p>BEVERLY Y MENARD ASST VICE PRESIDENT GTE - REGULATORY & GOV AFFAIRS ONE TAMPA CITY CENTER FLTC0616 TAMPA FL 33601-0110</p>		<p>C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label) <u>7002 0860 0001 1760 9517</u></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below</p>	
<p>PS Form 3811, March 2001</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. </p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

KF:mhl
Enclosure

cc: Cathery
Chery
Bob C
Della
James
Jerem



STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
LISA POLAK EDGAR



DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

August 1, 2005

(CERTIFIED MAIL NO. 7004-1160-0004-5750-6172)

Kerri L. Barsh, Esquire
Greenberg Traurig, P.A.
1221 Brickell Avenue
Miami, Florida 33131-3224

FPSC, CLK - CORRESPONDENCE
✓ Administrative Parties Consumer
DOCUMENT NO. 05539-06
DISTRIBUTION: _____

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Mr. Barsh:

Commission staff have advised that Document No. 05261-00, filed on behalf of NEXTLINK Florida, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to: **05261-00**

KERRI L BARSH ESQUIRE
GREENBERG TRAURIG PA.
1221 BRICKELL AVE
MIAMI FL 33131-3224

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

ISRAEL FRANCO

C. Signature

***Israel Franco**

☐ Agent

☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below:



3. Service Type

- ☒ Certified Mail ☐ Express Mail
- ☐ Registered ☒ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7004 1160 0004 5750 6172

PS Form 3811, March 2001

Domestic Return Receipt

102995-01-M-1424

STATE OF FLORIDA

COMMISSIONERS:
BRAULIO L. BAEZ, CHAIRMAN
J. TERRY DEASON
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON
LISA POLAK EDGAR



CAPITAL CIRCLE OFFICE CENTER
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399-0850

Public Service Commission

March 14, 2005

Kerri L. Barsh, Esquire
Greenberg Traurig, P.A.
101 East College Avenue
Tallahassee, Florida 32302

1221 Brickell Ave
Miami 33131-3224

Re: Return of Confidential Document to the Source, Docket No. 981444-TP

Dear Ms. Barsh:

Commission staff have advised that Confidential Document No. 05261-00, filed on behalf of NEXTLINK Florida, Inc. can be returned to the source. The document is enclosed.

Please do not hesitate to contact me if you have any questions concerning return of this material.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay Flynn".

Kay Flynn, Chief
Bureau of Records

KF:mhl
Enclosure

cc: Catherine S. Beard, Division of Competitive Markets and Enforcement
Cheryl Bulecza-Banks, Division of Competitive Markets and Enforcement
Bob Casey, Division of Competitive Markets and Enforcement
James Maduro, Division of Competitive Markets and Enforcement
Jeremy Susac, Office of the General Counsel

Marguerite Lockard

PSC-06-0284-FOF-TP

From: LaSandra Givens
Sent: Monday, March 27, 2006 9:18 AM
To: CCA - Orders / Notices
Subject: Order / Notice Submitted

Date and Time: 3/27/2006 9:17:00 AM
Docket Number: 981444-TP
Filename / Path: 981444OR.TLT.DOC

3pg

ORDER CLOSING DOCKET

960