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February 28, 2000

BY HAND DELIVERY

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

RECEIVED-FPSC
00 FEB 28 PM 3:09
RECORDS AND REPORTING

Re: Docket 981444-TP

Dear Ms. Bayo:

Enclosed for filing is a copy of a letter to Mr. William D. Talbott requesting that this docket be deferred from the February 29, 2000 Agenda Conference. A copy of this letter has been hand delivered to each of the people listed on the last page and a copy has been mailed to the parties of record.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Floyd R. Self
for Floyed R. Self

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- cc: Parties of Record

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FPSC-RECORDS/REPORTING

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BY HAND DELIVERY

Mr. William Talbott
Florida Public Service Commission
Shumard Oak
Tallahassee, Florida

RE: Request for Deferral,
Item 17, Docket No. 981444-TP, Number Conservation Measures

Dear Mr. Talbott:

On behalf of AT&T, BellSouth, GTE, Intermedia, MediaOne, MCI WorldCom, and Sprint, this letter is a formal request for the Commission to defer from the February 29, 2000 Agenda Conference Item 17, in Docket No. 981444-TP. Without addressing the substance of the pending Staff Recommendation, these carriers, which include their wireless affiliates, strongly believe that deferring this item will not adversely delay the beginning of implementation of further number conservation measures. It is essential that the progress that has been experienced by a cooperative process in planning and implementing number conservation measures not be stopped by a premature decision to act on this Staff Recommendation.

The Staff Recommendation filed on February 17th in this docket represents a fundamental change in the agreed upon process and procedure that the Commission has undertaken since the FCC's September 15, 1999 delegation order, and the Staff Recommendation fails to adequately address the substantial efforts that have been undertaken to achieve the Commission's number conservation goals.

A brief review of the history of this proceeding reinforces the need for deferral. On November 9, 1999, the Commission Staff conducted a workshop with all parties and other interested persons to discuss how the Commission could proceed with implementation of the FCC order. Many, if not most, of the code holders in Florida were present, including several wireless carriers and the parties to this letter. Mr. D'Haeseleer focused the discussion at that meeting on the basic fact that the Commission and parties were faced with the choice of either litigating the meaning and

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FPSC-RECORDS/REPORTING

Mr. William D. Talbott
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scope of the FCC's limited delegation, and thus delaying implementation of number conservation measures, or of working cooperatively to prepare and implement a number conservation plan, which would certainly speed the implementation of numbering relief.

The choice made that day was easy – we agreed to all work cooperatively.

With the Staff's active involvement considered critical to the ultimate success of this process, we divided our efforts into the five working groups identified in the recommendation with an oversight Steering Committee established to coordinate the work of the working groups and to help ensure an overall coherent plan that had the best chance for success.

Since the November 9th meeting, interested members of the industry have committed significant company resources, both in personnel and time, to address the various number conservation measures available under the FCC's delegation order. We estimate that to date, the cumulative time commitment is in excess of 1000 work-hours. More importantly, this commitment of time pales in comparison to the total hours that the industry will expend in the coming months to further conclude and implement the decisions of this cooperative process.

Needless to say, the February 17th Staff Recommendation comes as a total and complete surprise to all of the parties. A recommendation at this time was not planned, and is premature. Indeed, only two days before this Staff Recommendation was released, the Number Pooling Working Group had a meeting to discuss cost recovery issues after previously identifying and prioritizing NPAs for pooling. Based upon the decisions made in that meeting, this Working Group was prepared to meet again shortly thereafter to further address cost recovery and other implementation issues. Without addressing the specifics of the Number Pooling Working Group's decisions, it is clear that the pending Staff Recommendation ignores most of the work and decisions of this group and fails to properly address cost and cost recovery problems.

It cannot be emphasized enough at this point that while this Staff Recommendation appears to be predicated on the need for immediate action, there is no new or urgent problem that requires immediate Commission action today.

In view of the actual real world situation, our best recommendation is to defer to each of the respective working groups and the Steering Committee and allow them to present to the Commission the completed proposals they agreed to undertake. There remains sufficient time to allow the working groups and the Steering Committee to develop and implement the delegated authority in an orderly, cost-effective, comprehensive, and well-planned manner.

The February 17th Staff Recommendation, if adopted in its current form, would abrogate the agreement the parties had with the Staff, and force the carriers into a litigation mode. Unquestionably, approval of the Staff Recommendation would have the exact opposite effect of what is the well-intended purpose of this Staff Recommendation, which is the timely implementation

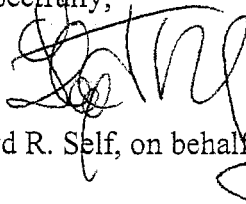
Mr. William D. Talbott
February 28, 2000
Page 3

of number conservation measures that will have a real and positive effect on the limited numbering resources currently available in this state.

We believe the majority of the code holders are working diligently and responsibly to conserve telephone numbering resources in Florida, and that they will continue to take the necessary measures to act responsibly in their use of these resources. In the interim, all we ask is that we be allowed to continue to work with the Commission Staff so that we can present the best possible plan for a successful and meaningful implementation.

We wish to make it clear that we appreciate the participation and cooperation of the Staff in working with interested members of the industry on this matter. It is precisely because considerable progress has been made through the cooperative, good faith process that had been established that we wish for the opportunity to complete our work. In view of the fact that there is no urgent or compelling need for immediate action, the effect of a deferral can only be a better result.

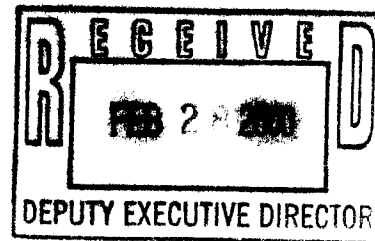
Respectfully,



Floyd R. Self, on behalf of the above carriers

cc: The Honorable Joe A. Garcia, Chairman
The Honorable J. Terry Deason, Commissioner
The Honorable Susan F. Clark, Commissioner
The Honorable E. Leon Jacobs, Commissioner
The Honorable Lila Jaber, Commissioner
Ms. Mary Bane
Mr. Walter D'Haeseleer
Ms. Sally Simmons
Mr. John Cutting
Mr. Levent Ileri
Cathy Bedell, Esq.
Ms. Noreen Davis
Beth Keating, Esq.
Diana Caldwell, Esq.
Ms. Ann Causseaux
Ms. Christine Romig
Parties of Record in Docket No. 981444-TP

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Mr. William D. Talbott
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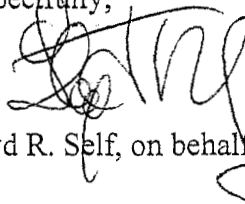
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Cathy Bedell, Esq.
Ms. Noreen Davis
Beth Keating, Esq.
Diana Caldwell, Esq.
Ms. Ann Causseaux
Ms. Christine Romig
Parties of Record in Docket No. 981444-TP

*Staff is opposed to deferring
this item. Staff are
prepared to move forward.
MAB*