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March 23, 2000

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

Re: Docket 981444-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Florida Code Holders Number Pooling Implementation Plan for the 954, 561, and 904 NPAs and an explanatory letter for filing in the above referenced docket. Also enclosed is a 3 1/2" diskette with the document on it in WordPerfect 9.0 format.


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

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APP _____
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FPSC-RECORDS/REPORTING

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 Hand Delivery (*) and/or U. S. Mail this 23rd day of March, 2000.

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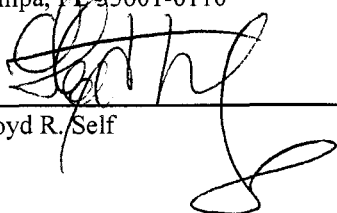
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March 23, 2000

VIA HAND DELIVERY

Ms. Blanca Bayó
Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0853

Re: Docket 981444-TL.

Dear Ms. Bayó:

I have been asked by the members of the informal Florida NXX Code Holders Group ("FCHG") to submit this letter to the Florida Public Service Commission ("FPSC" or "Commission") for its consideration. Attached to this letter of explanation, as Exhibit 1, is the Florida Code Holders Number Pooling Implementation Plan for the 954, 561, and 904 NPAs ("Plan") that represents a commitment to implement number pooling in the 954 NPA no later than December 4, 2000 and shortly thereafter in the 561 and 904 NPAs. This Plan has been executed by the same Florida code holders that are represented by this letter. By submission of this letter and Plan, we seek adoption of this Plan by the Commission as the overall best means of achieving meaningful number pooling in these NPA areas.

The members of the FCHG have worked almost daily for the past three weeks to develop the Plan and address the necessary details associated with appointment of an interim pooling administrator, minimum spacing between events, cost allocation, legal issues and others aspects of implementation. This effort involved over 20 code holders and carriers, and approximately 20 individuals. Because such a large group with diverse interests was able to reach agreement on a technically workable solution, the FCHG urges that the FPSC give this Plan deliberate, careful, and, ultimately, favorable consideration.

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FPSC-RECORDS/REPORTING

INTRODUCTION

The Plan is offered because the timeline and the technology that would be required by Order No. PSC-00-0543-PAA-TP, issued March 16, 2000 ("PAA Order") are not feasible for several reasons. As it stands today, the FPSC has proposed the implementation of number pooling in the 954 NPA on May 1, 2000, in the 561 NPA on July 1, 2000 and in the 904 NPA on October 1, 2000. The FCHG believes that its attached Plan will fully meet the FPSC's objectives for timely number pooling in these affected NPAs. More importantly, the FCHG Plan includes a realistic, achievable timetable that, unlike the PAA Order's proposed timetable, includes a testing interval to ensure network reliability. The Plan also would avoid the waste of time and costs that would result from implementing an interim form of pooling and then shortly thereafter migrating to the national standard.

For all practical purposes, the implementation of number pooling can begin in Florida no sooner than approximately the fourth quarter of 2000 regardless of the software used. In the final analysis, the decision comes down to the Commission selecting between Number Portability Administration Center ("NPAC") Release 1.4 ("R1.4") or NPAC Release 3.0 ("R3.0"). Given R3.0's substantial service reliability advantages and lower potential cost recovery impact on end users, the FCHG strongly favors the R3.0 solution and believes that the FPSC will concur if it reassesses this issue after considering the information provided herein.

In light of the negligible difference in realistic implementation dates and the enormous operational, reliability, and cost advantages of R3.0, to customers and carriers alike, we have targeted R3.0 for implementation and have committed to the earliest resulting time frames that are outlined in the Plan. A summary of the relative merits and cost issues of the R3.0 and R1.4 is included as an explanation of the background and factual analysis leading up to this commitment. A brief discussion of the Texas Public Utility Commission's ongoing consideration of this issue also is provided to give the FPSC additional background on a concurrent and similar state commission proceeding involving the R1.4 versus R3.0 issue.

Some of the highlights of the Plan include a commitment that number pooling, using the Release 3.0 software, will begin in the 954 NPA no later than December 4, 2000, with appropriately staggered implementation in the 561 and 904 NPAs quickly following. An Interim Pooling Administrator and cost allocation proposal are included in the Plan as well. Furthermore, the FCHG will commit to provide monthly status reports of testing and other implementation issues to the FPSC throughout the implementation process.

The Plan was developed in response to comments made by some of the Commissioners at the February 29, 2000, FPSC Agenda Conference indicating that a majority, if not all, of the

Commissioners would welcome the opportunity to consider a proposal of the code holders and their explanation of the relevant facts¹. The FCHG believes that the Commission considers implementation of number conservation to be an ongoing process. This letter and Plan also represent the FCHG's continuing input to the FPSC number pooling decision making process which is required by FCC Order 99-249, issued in CC Docket No. 96-98, September 15, 1999 ("Delegation Order")². The FCHG submits that the Plan is consistent with the Commission's grant of authority, as delegated by the Federal Communications Commission ("FCC"), to implement number conservation measures.

ISSUE BACKGROUND

In response to the notification of the North American Numbering Plan Administrator ("NANPA") that a number of Florida NPAs are in jeopardy of exhaust, the FPSC established Docket No. 981444-TL to address alternative telephone number utilization and conservation measures. On April 2, 1999, the FPSC filed a petition with the FCC seeking additional authority to implement number conservation measures. On May 27, 1999, many of the FCHG members filed, and the FPSC accepted, a Stipulation and Voluntary Number Management Measures, which committed those carriers to various number management practices, including measures that would better preserve thousands number blocks for number pooling. See, Order No. PSC-99-1393-S-TP.

On September 15, 1999, the FCC issued its Delegation Order that granted in part the FPSC's April 2nd petition, and delegated to the FPSC interim authority to implement certain specific number conservation measures in Florida, including number pooling trials. In response, on October 20, 1999, the FPSC Staff conducted a workshop with all interested parties to discuss how the Commission could proceed with the implementation of the FCC's September 15th Delegation Order. The members of the FCHG diligently worked with the FPSC Staff and other parties on five separate number conservation working groups to address thousands block number pooling, short term number conservation efficiency measures, code sharing, rate center consolidation, and the legal issues associated with the FCC's delegation order.

Early in the process, the number pooling working group overwhelmingly concluded that R3.0 was the appropriate software version for implementation of number pooling. At Staff's urging, the code holders approached the joint Limited Liability Corporation ("LLC") group and successfully convinced it that the Southeast NPAC region should be moved up in release priority over the other regions. In addition, a substantial premium had been paid to NeuStar in exchange for NeuStar's

¹ Commissioner Jacobs, who cast one of the three majority votes, indicated that he might suggest that the Commission re-evaluate its position.

² Order 99-249 effectively requires that the Florida Commission must consult with the industry in making its decision regarding the number pooling methodology. See, Order 99-249 at ¶ 13.

(then Lockheed-Martin) commitment to accelerate the delivery of R3.0 by five months, resulting in NeuStar's commitment to make R3.0 available for testing in June 2000 and for general application by the release date of December 4, 2000. These actions are indicative of the code holders' diligence in working with the FPSC Staff to bring the most effective and reliable number pooling solution to Florida this year.

On February 17, 2000, a Staff Recommendation was filed proposing that the FPSC immediately order several number conservation measures, including a number pooling plan that had yet to be considered in any way by the members of the working group established for that purpose. On February 29, 2000, the FPSC approved by a 3-2 vote the number pooling portion of the February 17th Staff Recommendation. Notwithstanding the outcome of the vote, the FCHG members believe that the Commission intended for the code holders to continue to work on a viable and firm plan to implement number pooling in a manner that will benefit all Floridians³. The FCHG is proud to present this Plan for the Commission's consideration.

In offering the Plan, the FCHG commends the FPSC for having taken the crucial step of proposing to order that the 1999 voluntary number management measures shall now become mandatory. The FCHG members also support the Commission's ordering the return of all unused codes pursuant to the CO Code Assignment Guidelines of the Industry Numbering Committee. The members of the FCHG do not intend to contest these actions. These measures, which minimize the contamination of thousands blocks, will aid in the effective deployment of number pooling at the thousands block level and mitigate any difference in NPA exhaust that may be occasioned by implementing number pooling using R3.0. Having implemented effective number management and code return measures, the next logical step is for the Commission to adopt a practical and workable number pooling plan.

There appears to be unanimous agreement that appropriate number pooling and number pooling trials should be implemented in a timely fashion. A significant area of disagreement in Florida on this issue surfaced in the February 17, 2000 Staff Recommendation. That difference manifests itself first and foremost as a timing issue, but the issue is truly one of system reliability, cost, and customer benefit. As is discussed below, number pooling cannot occur before the fourth quarter of 2000. Assuming a March 30, 2000 Implementation Meeting, the earliest theoretical implementation date (using the trial version of pooling software – Release 1.4) would be September 25, 2000. This date is theoretical because it is likely that the PAA Order, which would require the implementation of R1.4 by May 1, would be protested, which would result in a delay in the first implementation meeting until a final order resolving the PAA Order protest was issued.

³ Indeed the FPSC issued a press release that same day stating that “The Florida Public Service Commission ... directed the industry to develop a schedule for implementing ‘number pooling,’ a process that allows several service providers to share a single block of telephone numbers.”

The Plan would achieve an implementation date (using the more modern, forward-looking Release 3.0) on December 4, 2000. There is no evidence that the brief period between the feasible implementation dates of R1.4 and R3.0 would materially affect the exhaust date of an existing Florida NPA. In Illinois for example, the current pace of thousands block allocation is 30 each month. This equates to 3 NXXs per month, a rate which would not significantly affect the three Florida jeopardy NPA exhaust date assumptions.

More importantly, with mandatory thousands block number management in place, there is little reason to expect that the number of thousands blocks available to the pool would be materially different in December 2000, whether pooling began at that time or at some earlier date. A significant number of the code holders in 954 are not LNP capable. These code holders, such as wireless providers, will use the same number of NXXs between now and December regardless of when pooling is implemented.

As for the LNP capable code holders, their total utilization of numbers between now and then will depend on the demand for their services. The number of customers they obtain, and their need for telephone numbers, is unlikely to change, whether pooling were implemented in May or December. Thus, the total amount of numbers consumed in 954 between now and December is not going to change, regardless of the Commission's decision in this instance.

The only issue, then, is whether additional thousands blocks would remain uncontaminated between May and December if pooling were ordered sooner. This is highly unlikely. Most affected carriers already are managing thousands blocks consistently with the PAA Order, and all will soon be required to do so. If an LNP capable carrier were forced to obtain a full NXX before pooling were implemented, it would be required to utilize the NXX in a manner designed to preserve uncontaminated thousands blocks, which would then be donated to the pool when pooling is implemented. This means that the pool will not be materially different for the number of uncontaminated thousands blocks available in December, whether pooling begins in May or in December. Accordingly, there is no reason to believe that the implementation of pooling by December 4, 2000, in 954 (rather than May 1) would diminish the lifespan of that NPA in any material way.⁴ Attached to this letter is Exhibit 2, which presents a comparative implementation timeline and some of the key assumptions underlying R1.4 that underly its theoretical implementation.

IMPLEMENTATION CONSIDERATIONS

⁴ The FCHG believes that the chart discussed at the February 29, 2000 Agenda Conference may have been inaccurate in this respect since it assumed an unrealistic May 1 implementation date, and a much wider gap in NPA life with respect to R1.4 and R3.0 implementation.

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Telephone number resources and their prudent and proper management are critical to the daily operations of the public switched network and the health, safety, and welfare of the citizens who rely upon it working, and working properly, every time they pick up a telephone. Number pooling represents an entirely new process and procedure for the assignment of telephone numbers to carriers that impacts more than just the people needing a new telephone number. Because of its far reaching consequences throughout the entire telephone network, pooling cannot be implemented overnight. Successful number pooling requires updates and changes to numerous systems by all carriers and requires thoughtful planning, crafting, and testing before going "live." In this respect, the experience of the Public Utility Commission of Texas ("Texas PUC") is especially illuminating.

The Texas PUC on January 27, 2000 initially ordered implementation of number pooling by August 1, 2000. In doing so, the Texas PUC recognized that R1.4 is less efficient than R3.0 and would require more manual processes. Significantly, it also recognized that even the R1.4 solution would require at least 5 months for carriers to implement modifications to their OSS systems.

Subsequently, the Texas Staff agreed to consider, and recommend to the PUC for approval, a firm commitment by the carriers that would give them the opportunity to implement R3.0 if they could meet a December 11, 2000, implementation deadline for the 512 NPA. The Texas code holders are currently meeting to reach consensus on such an approach.

The FCHG shares the FPSC's goal that effective number conservation measures should be implemented as soon as possible. The FCHG further understands that the Commission is concerned that the pace of implementation has moved too slowly and that the FPSC has in part ordered an extremely aggressive implementation schedule to move the process along. The FCHG has taken these considerations to heart. The FCHG believes that, much like the process in Texas, the Florida process can proceed in a manner that accomplishes the expedited implementation of a plan that will extend the exhaust dates of the subject NPAs while minimizing customer impacts and reasonably recognizing the legitimate operational, reliability, and cost considerations.

It had been suggested to some carriers that an Implementation Meeting between Staff, NeuStar (the presumptive Interim Pooling Administrator), and the carriers would be scheduled for March 30, 2000. Assuming such a meeting, this would leave only 30 calendar days in which to take all the necessary steps to select an administrator, establish forecast reporting, block protection dates, and block identification dates, assess code holder inventory and/or deficiencies, establish a block donation date, and establish a pool start/allocation date. Additionally, the PAA Order includes no intervals for acquiring needed Service Control Points ("SCPs"), making necessary OSS modifications, or conducting necessary testing of R1.4 with the OSS systems to ensure network reliability. The Texas PUC recognized that these processes take at least 5 months, and it appears on the way to establishing a more realistic timeframe based upon this understanding.

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The FCHG believes that a minimum of 5 months from the initial Implementation Meeting is required. Consequently, for purposes of conducting a relative merits analysis, a 5½-month implementation timeframe was assumed from initial Implementation Meeting to a Mandatory Implementation Date utilizing R1.4. The comparison also assumes that the first Implementation Meeting for R1.4 would occur on March 30, which is unlikely. The same timeframe would apply for establishing the milestone dates leading up to implementation of pooling using R3.0. The earliest R3.0 implementation date is determined by the general availability release date on December 4, 2000, of course. In the timeline committed to in the Plan, system modification and testing will occur independently of, yet concurrent with, the milestones.

The FCHG submits that these system planning, modifications, and testing timeframes are necessary to ensure that no breakdown occurs in the functioning of the network, the service ordering process, or any other service/customer affecting systems. There is no dispute on this point. Therefore, it is clear that the proposed May, July, and October implementation dates under the PAA Order are not technically feasible.

Accepting all the assumptions as true, September 25, 2000, is the earliest theoretical implementation date that would be possible using R1.4. As for R3.0, the North American Portability Management LLC determined that the Southeast Region, which includes Florida, will have authorization to use R3.0 for pooling beginning on December 4, 2000. Thus, the difference between the earliest theoretical implementation dates for R1.4 and R3.0 is 70 days. Under the current number management practices, and with implementation of mandatory number management measures and the return of unused codes, the 70 days difference should cause no reduction in effective number conservation or lengthening of the NPA exhaust dates that pooling will bring.

R3.0 VS. R1.4

The facts demonstrate that R3.0 is superior to R1.4 for several reasons. First, R1.4 does not use efficient data recognition ("EDR"). Thus, R3.0 would involve far fewer manual processes than R1.4 and thereby improve customer service by decreasing the probability of system errors and failure. Second, R3.0 with EDR is extremely efficient, and thus less costly, from the standpoint of record storage capacity. Third, use of R3.0 at the outset avoids imposition of wasteful transition costs that would be incurred if pooling were to be implemented mere days before R3.0 availability. Fourth, use of R3.0 will avoid the importation to Florida carriers and, ultimately, to Florida customers, of R1.4 costs that are now being borne only in Illinois, New York, and California. Fifth, there are many unknowns regarding the transition from R1.4 to R3.0 that should further increase this Commission's reluctance to utilize R1.4 in the first instance.

R3.0 provides improved reliability with less human intervention than does R1.4. Today, a carrier that receives a thousand block from the Pooling Administrator has to notify the NPAC

manually to have the thousand block activated using R1.4. With R3.0 the carrier is able to use the Service Order Administration ("SOA") link to the NPAC to activate a thousands block. With further automation within the carrier's OSS, the entire activation process can be automated for more efficient reliability. Because R3.0 will be integrated with the existing carrier systems it minimizes the risk of human error that is inherent in the manual processing of pooling and the associated LNP functionality.

With respect to the cost imposed on carriers' facilities, the absence of EDR with R1.4 means that each number in the pool must have its own record. R3.0 uses EDR, which allows one record per 1,000 number block. The EDR method allows the implementing carriers to minimize the cost to modify the SCP. Avoiding these investments would mean that other carriers and customers would not be required to pay for these costs. Likewise, without EDR carriers who inadvertently underestimate the volume of pooling transactions and do not make timely SCP upgrades face failures that would jeopardize network reliability and customer service.

One comparative issue that was seriously considered by the code holders was the possibility that the R3.0 solution might not be available as advertised. As discussed above, in response to growing regulatory and customer concerns, the LLCs (which includes some of the members of the FCHG) approached NeuStar (previously Lockheed-Martin) and paid a substantial premium in exchange for a contractual obligation by NeuStar to deliver the R3.0 software 15 weeks ahead of the prior commitment. FCHG and NeuStar are highly confident that the current schedule and contractual obligation for the delivery of R3.0 will be met.

Although the FCHG is firmly convinced that the costs of any implementation of R1.4 will be greater on Florida code holders and their customers than initial implementation using only R3.0, specific, detailed cost information is not uniformly available at this time. One large incumbent LEC has estimated, based on experience in other state pooling proceedings, that the cost to the end user for implementation of R3.0 only could be in the range of 20 - 25% of the level of the existing FCC-authorized LNP surcharge. However, the direct costs of implementation of R1.4, transition to R3.0, and the subsequent costs of pooling using R3.0 could result in a cumulative cost that would lead to a separate surcharge approaching 50% of the LNP surcharge level. This estimated potential doubling in the cost is a major reason why the FCHG has chosen R3.0⁵.

The difference in total costs between implementing R3.0 first, and implementing R1.4 as an interim measure, when weighed against the minimal difference in the effects on the lives of the three NPAs in the PAA Order, suggests that it would be wasteful to require the interim implementation of R1.4 in any of these NPAs. When one adds the fact that Florida carriers and customers would

⁵ Alternatively, if R1.4 is the only solution used, the cost – driven by enormously expensive SCP upgrades – would possibly exceed the LNP surcharge level.

shoulder a disproportionate amount of the implementation costs associated with R1.4, it seems clear that any marginal benefits that might be gained from implementing R1.4 simply are not worth the costs.

Finally, the R1.4 to R3.0 transition process has not been executed, much less tested, in any area to date. The possibility exists that such a transition could cause calls to fail. This risk should further increase the Commission's reluctance to utilize R1.4 in the first instance.

COST RECOVERY ISSUES

In its order granting authority to this Commission to conduct number pooling trials, the FCC directed this Commission to “determine the method to recover the costs” of any number pooling the Commission may order. FCC Order No. 99-249, at ¶ 17.⁶ In addition, these costs must be recovered “in a competitively neutral manner.” *Id.* The FCC suggested that this Commission, in fulfilling its responsibility to adopt a cost recovery method, should model cost recovery on the mechanism adopted by the FCC in the LNP order and the guidelines in the *Numbering Resource Optimization Notice* regarding cost recovery for thousands block pooling. *Id.*

In view of the potential ultimate impact of number pooling cost recovery on Florida customers, the Commission should address cost recovery. Accordingly, the Plan requires that the Commission open a docket in accordance with the FCC mandate for the purpose of determining the amount of those costs and the method by which they will be recovered.

OTHER PLAN PROVISIONS

In addition to the discussion of the Plan, the background and the associated relative analysis that underlies the Plan, the FCHG believes that it is important to identify the other assumptions and contingencies associated with the Plan.

The Plan will be binding on its signatories only to the extent it is implemented by the FPSC and the pooling requirements in the PAA Order are withdrawn.

If the Plan is implemented, the FCHG will not protest or request reconsideration or seek appeal of any order of the Commission adopting, acknowledging, or approving the Plan in accordance with its terms. Certain members of the FCHG may, however, seek Commission action on the issue of cost allocation if there is no agreement on a single cost allocation methodology, and

⁶ It should be noted that the February 17 Staff Recommendation suggests, based on a comment from NANPA about activities in other states, that the Commission need not address cost recovery for number pooling at the time pooling is ordered. The FCHG members respectfully disagree.

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they do not waive their right to advocate a preferred methodology in the absence of an agreement.

In view of the possibility that the FCC may take some action that could affect the ability of the FCHG members to fully and completely implement the Plan, the FCHG will bring any conflict to the FPSC for appropriate resolution.

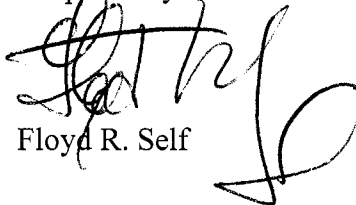
At the February 29 Agenda, certain signatories to the Plan indicated that they likely would be forced to protest the number pooling requirement recommended by Staff if it were approved by the Commission. Our Plan was developed as a way of ultimately avoiding litigation over the FPSC's proposed pooling plan. Accordingly, in the event that the FPSC does not implement the Plan as proposed, the Plan would not be admissible in any proceeding nor would it constitute a waiver of any position that a signatory might otherwise take or have taken.

In addition to the commitments in the Plan, the FCHG states here that it will work cooperatively with the Commission to resolve any necessary or desirable implementation issues that may arise subsequent to the adoption of this Plan. We have tried to account for all contingencies, but it is possible we missed something.

The purpose of the Plan is to only address number pooling and none of the other matters within the PAA Order. The FCHG shall continue to work with the Commission, other carriers, and interested persons to develop reasonable and prudent solutions to the remaining number conservation issues in Florida.

The FCHG members offer the Plan to the FPSC in the spirit of cooperation and for its consideration in the ongoing effort to implement workable, efficient, and cost-effective number conservation measures for the people of Florida. We request favorable consideration of this Plan as a part of the Commission's ongoing deliberations regarding number conservation in Florida.

Respectfully submitted.



Floyd R. Self

FRS

Attachments

cc: Parties of Record
Mr. William Berg
Ms. Melinda Butler
Ms. JoAnn Chase
Mr. George Cruz- Bustillo
Mr. Wilbur J. Stiles

EXHIBIT 1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Number Utilization Study: Investigation)
Into Number Utilization Measures)
_____)

Docket No. 981444-TP

**FLORIDA CODE HOLDERS
NUMBER POOLING IMPLEMENTATION PLAN
FOR THE 954, 561, AND 904 NPAs**

1. Number pooling for those carriers that have implemented permanent local number portability (“LNP”) in the Ft. Lauderdale metropolitan statistical area (“MSA”) shall begin in the 954 numbering plan area (“NPA”) no later than December 4, 2000, using uncontaminated 1000s number blocks as is further detailed below. This means that no later than December 4, 2000, assignment on the 1000s number block level will be available from the Interim Pooling Administrator.

2. Number pooling for those carriers that have implemented permanent LNP in the Palm Beach MSA shall begin for the Palm Beach MSA area of the 561 NPA (i.e., Palm Beach County) no later than February 5, 2001, using uncontaminated 1000s number blocks as is further detailed below. This means that no later than February 5, 2001, assignment on the 1000s number block level will be available from the Interim Pooling Administrator.

3. Number pooling for those carriers that have implemented permanent LNP in the Jacksonville MSA shall begin in the Jacksonville MSA area of the 904 NPA (i.e., Clay, Duval, Nassau, and St. Johns Counties) no later than April 2, 2001, using uncontaminated 1000s number blocks as is further detailed below. This means that no later than April 2, 2001, assignment on the 1000s number block level will be available from the Interim Pooling Administrator.

4. The national standard Number Portability Administration Center (“NPAC”) software release 3.0 will be used in the 954, 561, and 904 pooling plan areas by those carriers that have implemented permanent LNP in the respective MSAs.

5. Attached hereto as Attachment “A” is a proposed timeline that identifies key milestone dates leading up to the number pooling implementation dates specified in Paragraphs 1, 2, and 3 above for each of the respective NPA pooling plans. Other than the dates specified in Paragraphs 1, 2, and 3 above for the pooling of uncontaminated 1000s number blocks, the dates contained in Attachment “A” are planned dates based upon implementation schedule information currently available. As is identified in Attachment “A,” the first scheduled event for each NPA will be an implementation meeting of all of the code holders, FPSC Staff, and other relevant parties. At that implementation meeting, an official implementation schedule will be established, including

dates for the later donation and pooling of contaminated 1000s number blocks as necessary, which may result in some of these other dates changing slightly from those identified in Attachment "A." However, based upon the submission and approval of this Florida Code Holders Number Pooling Implementation Plan ("Plan") by the Florida Public Service Commission ("FPSC"), the undersigned code holders have made a commitment to the dates specified in Paragraphs 1, 2, and 3 for the beginning of number pooling in the respective NPA/MSA areas using uncontaminated 1000s number blocks.

6. The code holders executing this Plan have proceeded upon the assumption that the FPSC can select NeuStar as the Interim Pooling Administrator and that NeuStar will serve as the Interim Pooling Administrator for each of the 954, 561, and 904 NPA pooling plans identified herein until such time as the Federal Communications Commission ("FCC") selects a permanent pooling administrator. The dates specified in Attachment "A" hereto are predicated on the timely selection of NeuStar by the FPSC to be the Interim Pooling Administrator for the 954, 561, and 904 pooling plans and NeuStar's acceptance. If there is a delay in selecting an Interim Pooling Administrator, if the FPSC selects a different Interim Pooling Administrator than NeuStar, or if NeuStar does not accept selection as the Interim Number Pooling Administrator, then it may not be possible to comply with the dates specified in Attachment "A." In approving this Plan, and for the sole purpose of the immediate implementation of number pooling in the specified areas of the 954, 561, and 904 NPAs, the undersigned NXX code holders respectfully request that the FPSC select NeuStar as the Interim Pooling Administrator for each of the 954, 561, and 904 NPA pooling plans identified herein, and that NeuStar accept such selection to act as the Interim Pooling Administrator until such time as the FCC names the permanent pooling administrator. The undersigned make no assumption, whatsoever, that NeuStar will ultimately be selected as the permanent Pooling Administrator.

7. The code holders executing this Plan have also assumed that the necessary contractual arrangements with NeuStar will be in place so that the number pooling identified herein can be undertaken on a timely basis. In the other states, the necessary contractual obligations for implementation of number pooling have been undertaken by the respective LNP limited liability companies ("LLC"), which in turn have contracted with NeuStar as the Interim Pooling Administrator and undertaken such other necessary implementation measures. The dates specified in Attachment "A" hereto are predicated on the FPSC requesting and the North American Portability Management LLC accepting appointment as the contracting agent of the FPSC for implementation of the 954, 561, and 904 pooling plans. If the FPSC appoints a different contracting agent than the North American Portability Management LLC, then the parties hereby advise the FPSC that it may not be possible to comply with the dates specified in Attachment "A." In approving this Plan, the undersigned NXX code holders respectfully request that the FPSC name the North American Portability Management LLC as the contracting agent for each of the 954, 561, and 904 NPA pooling plans identified herein.

8. Interim Methodology For Allocating The Costs Of The Interim Pooling Administrator.

A. Paragraph 17 of FCC Order No. 99-249, CC Docket No. 96-98, September 15, 1999, requires the FPSC to ensure that the costs of the Interim Pooling Administrator are allocated among the service providers within each affected NPA area subject to pooling on a competitively neutral basis. The FPSC order adopting this Plan shall direct that there shall be a meeting limited to only the affected service providers within each of the NPA areas subject to pooling under this Plan, at which time they shall determine an interim cost allocation methodology. This interim cost allocation methodology shall be provided to the North American Portability Management LLC for inclusion in the implementation contract with the Interim Pooling Administrator, and only the cost allocation provisions of the proposed implementation contract shall be submitted to the FPSC for review prior to the first implementation meeting. In reviewing the Interim Pooling Administrator cost allocation provisions of the implementation contract under paragraph 7 above, the FPSC shall reject such provisions if the FPSC finds that such provisions do not comply with FCC Order No. 99-249.

B. The first meeting of the affected service providers for each NPA pooling plan to determine the interim cost allocation methodology shall occur within 10 business days of the issuance of the FPSC order approving this Plan. The interim cost allocation methodology chosen by the affected service providers shall be provided to the North American Portability Management LLC in accordance with its procedures for consideration at its next meeting.

C. In the event the service providers cannot agree on an interim cost allocation methodology, the FPSC shall order an interim cost allocation methodology from those that are submitted to or developed by the North American Portability Management LLC and forwarded to the FPSC. In ordering an interim cost allocation methodology under these circumstances, the FPSC shall pick a methodology that allocates the costs of the Interim Pooling Administrator in a manner that complies with FCC Order No. 99-249.

D. Any interim cost allocation methodology chosen under this Plan shall be subject to a retroactive true-up by the FPSC to any permanent cost allocation methodology. The true-up should also include selection of the entity responsible for performing such true-up.

9. Paragraph 17 of FCC Order 99-249 also requires that the FPSC must determine the method of recovering the costs of any number pooling it orders and that such recovery must be done on a competitively neutral basis. Accordingly, the FPSC order adopting this Plan shall state that the costs associated with number pooling shall be recovered in a competitively neutral basis and that the FPSC shall open a separate docket for the purpose of determining the amount of the pooling costs to be recovered and the method by which such costs will be recovered.

10. The number pooling to be implemented under this Plan shall follow the most recently approved and effective Industry Numbering Committee (“INC”) Guidelines, which at the time of the submission of this Plan to the FPSC is dated February 28, 2000. Any subsequently modified INC Guidelines shall not be utilized until they have been approved and become effective pursuant to the INC.

11. On the first business day of each month from May 2000, through May 2001, those carriers that have implemented permanent LNP in the respective three MSAs will provide the FPSC with a monthly status report on the testing and implementation progress of the NPAC release 3.0 and such implementation in the 954, 561, and 904 NPAs.

12. Implementation of this Plan is contingent upon the FPSC adopting this Plan in lieu of the 954, 561, and 904 NPA number pooling plan contained in FPSC Order No. PSC-00-0543-PAA-TP, issued March 16, 2000, and taking no further action to implement a pooling plan contrary to that identified herein for the 954, 561, and 904 NPA absent further direction from the FCC. Acceptance of this paragraph shall not preclude the FPSC, the undersigned code holders, or others from developing number pooling plans for other MSA/NPA areas consistent with FCC Order No. 99-249 or in addressing other number conservation measures delegated to the FPSC by FCC Order No. 99-249.

13. This Plan shall take effect on the date that the FPSC order adopting it becomes final agency action pursuant to Florida Statutes Chapter 120.

14. This Plan and the number pooling plan for the 954, 561, and 904 NPAs contained herein are entered into for purposes of implementing a meaningful, workable number pooling plan for the affected areas of the 954, 561, and 904 NPAs without further litigation. This document shall be valid and binding on the undersigned parties only to the extent it is adopted in its entirety as presented to the FPSC, and no provision of this Plan shall be deemed waived, amended, or modified by any code holder subscribing to this Plan unless such waiver, amendment, or modification is in writing, dated, and signed by all such code holders.

15. In the event that the FPSC does not accept this document in its entirety pursuant to its terms, this document shall not be admissible in any hearing on the matters established by this docket, or in any other docket or forum. Moreover, no party to this Plan waives any position on any issue that it could have otherwise asserted in this or any other docket as if this document had never been developed and written.

16. If the FPSC adopts this Plan as provided for herein, then the undersigned shall not protest, request reconsideration, or appeal of the order of the FPSC adopting this document in accordance with its terms.

17. The undersigned Florida NXX code holders recognize that on March 17, 2000 the FCC held a public meeting regarding adoption of further national number conservation measures. The undersigned Florida NXX code holders believe that the number pooling requirements contained

herein for the 954, 561, and 904 areas specified in Paragraphs 1, 2, and 3 above are consistent with FCC Order No. 99-249 and that this Plan will meet any requirements that the FCC may impose for a permanent number pooling solution for Florida. The undersigned Florida NXX code holders hereby commit to the FPSC that they shall work diligently, consistently, and in good faith to fully and completely implement this Plan, but if the FCC's order or subsequent FCC actions not contemplated herein make it appropriate, the undersigned code holders shall report back to the FPSC with any necessary or desirable modifications to this Plan so that it can be completed consistent with all of the requirements of the law.

18. By agreeing to the number pooling plan described herein, the undersigned Florida NXX code holders are not conceding that the FPSC has jurisdiction over numbering matters beyond the authority specifically delegated to the FPSC. Accordingly, this document shall not be used by any person to assert that the undersigned have conceded jurisdiction on such issues or that they have waived any rights with respect to such jurisdictional issues.

19. This Plan shall be binding upon, and inure to the benefit of the parties hereto and their respective successors and permitted assigns.

20. The undersigned Florida NXX code holders have prepared and offered this Plan in good faith and in the belief that its terms represent a workable, efficient, cost effective, and overall best means of achieving meaningful number pooling in the 954, 561, and 904 NPAs consistent with the terms of the FCC's Order No. 99-249 and the needs of Florida telecommunications customers.

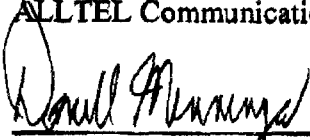
This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

(Signatures begin on the following page)

03/22/00 TEL 10:00 FAX 501 500 5010 RECEIVED STATE REG. 1000

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

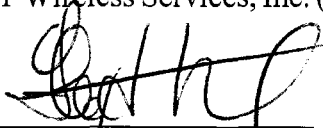
ALLTEL Communications, Inc.



Darrell L. Mennenga
Staff Manager, State Government Affairs
One Allied Drive, P. O. Box 2177
Little Rock, AR 72202
(501) 905-5651

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

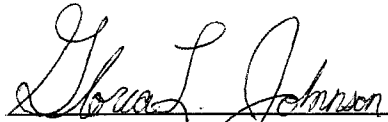
AT&T Communications of the Southern States, Inc., and
AT&T Wireless Services, Inc. (for itself and its Florida operating subsidiaries and affiliates)

A handwritten signature in black ink, appearing to read 'F. Self', written over a horizontal line.

Floyd R. Self, Esq.
MESSER, CAPARELLO & SELF, P.A.
215 S. Monroe St., Suite 701
Tallahassee, FL 32301
(850 222-0720)

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

BellSouth Mobility, Inc., on behalf of itself, subsidiaries and affiliates.

 (by FRS, with express permission)

Gloria L. Johnson, Esq.

General Attorney

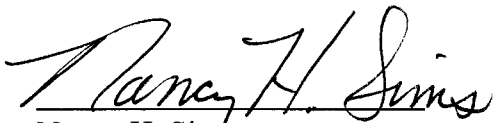
1100 Peachtree St., N.E., Suite 910

Atlanta, GA 30309-4599

(404) 249-0925

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

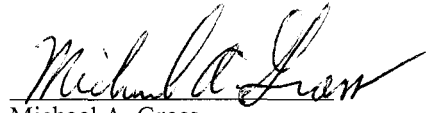
BellSouth Telecommunications, Inc.

A handwritten signature in cursive script that reads "Nancy H. Sims". The signature is written in black ink and is positioned above a horizontal line.

Nancy H. Sims
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301
(850) 222-1201

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

Florida Cable Telecommunications Association, Inc.

A handwritten signature in cursive script, appearing to read "Michael A. Gross".

Michael A. Gross
Vice President, Regulatory Affairs and Regulatory Counsel
310 N. Monroe St.
Tallahassee, FL 32301
(850) 681-1990

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

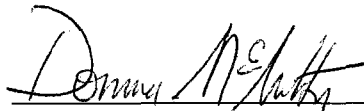
GTE Service Corporation

A handwritten signature in black ink, appearing to read "Kim Caswell" followed by "for" written in a smaller, less distinct script.

Kim Caswell, Esq.
Counsel for GTE Service Corporation
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
(727) 360-3241

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

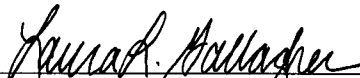
MCI WorldCom, Inc. and its operating subsidiaries

 (by FRS, with express permission)

Donna McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303
(850) 422-1254

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 23rd day of March, 2000, by and on behalf of the following:

MediaOne Florida Telecommunications Inc.

A handwritten signature in cursive script, appearing to read "Laura L. Gallagher", is written over a horizontal line.

Laura L. Gallagher, Esq.

Laura L. Gallagher, P.A.

101 E. College Avenue, Suite 302

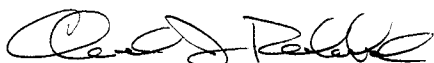
Tallahassee, FL 32301

Tel: (850) 224-2211

Fax: (850) 561-6311

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

Sprint PCS,
Sprint Communications Company Limited Partnership, and
Sprint-Florida, Incorporated



Charles J. Rehwinkel
Susan Masterton
P.O. Box 2214
MC FLTLHO0107
Tallahassee, Florida 32301-2214

FOR:
Sprint Communications Company
Limited Partnership
Sprint-Florida, Incorporated

AND



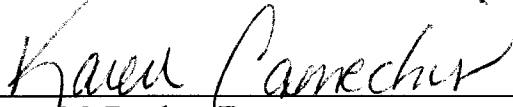
Joe Assenzo
49000 Main Street, 11th Floor
Kansas City, Missouri 64112
(816) 559-1000

FOR:
Sprint PCS

THEIR ATTORNEYS

This Florida Code Holders Number Pooling Implementation Plan is submitted in Florida Public Service Commission Docket No. 981444-TP this 22nd day of March, 2000, by and on behalf of the following:

Time Warner Telecom of Florida, L.P.



Peter M. Dunbar, Esq.

Karen M. Camechis, Esq.

PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A.

Post Office Box 10095 (32302)

215 S. Monroe Street, 2nd Floor

Tallahassee, Florida 32301

(850) 222-3533

(850) 222-2126 (facsimile)

Attachment A to Exhibit 1

FLORIDA THOUSANDS BLOCK POOLING PROPOSED IMPLEMENTATION TIMELINES

Assumptions:

1. Based on INC 99-0127-023, Thousand Block (NXX-X) Pooling Administration Guidelines, Issued February 28, 2000
2. Non-contaminated Blocks
3. Pooling Administrator (PA) already selected
4. Pooling Administrator assumed to be NeuStar

TABLE 1.0

NPA 954	NPAC Release 3.0
Regulatory Mandate	
First Implementation Meeting	June 12, 2000
Forecast Report Date	June 26 2000
Block Protection Date	July 31, 2000
Block Donation Identification Date	August 2, 2000
Pooling Administrator Assessment of Industry Inventory Surplus/Deficiency	August 23, 2000
Block Donation Date	November 20, 2000
Pool Start/Allocation Date	December 4, 2000
Mandated Implementation Date	December 4, 2000
TN Assignment from 1K block	December 25, 2000

TABLE 2.0

NPA 561	NPAC Release 3.0
Regulatory Mandate	
First Implementation Meeting	August 3, 2000
Forecast Report Date	August 17, 2000
Block Protection Date	September 19, 2000
Block Donation Identification Date	September 21, 2000
Pooling Administrator Assessment of Industry Inventory Surplus/Deficiency	October 12, 2000
Block Donation Date	January 22, 2001
Pool Start/Allocation Date	February 5, 2001
Mandated Implementation Date	February 5, 2001
TN Assignment from 1K block	February 26, 2001

TABLE 3.0

NPA 904	NPAC Release 3.0
Regulatory Mandate	
First Implementation Meeting	September 28, 2000
Forecast Report Date	October 12, 2000
Block Protection Date	November 14, 2000
Block Donation Identification Date	November 16, 2000
Pooling Administrator Assessment of Industry Inventory Surplus/Deficiency	December 7, 2000
Block Donation Date	March 19, 2001
Pool Start/Allocation Date	April 2, 2001
Mandated Implementation Date	April 2, 2001
TN Assignment from 1K block	April 23, 2001

Table 1.0 Definitions from INC Guidelines:

- a) Regulatory Mandate - The date of regulatory notification that thousand block pooling is to be implemented.
- b) First Implementation Meeting - The meeting held by the PA for all participating SPs to develop the time intervals between the milestones.
- c) Forecast Report Date - The deadline for SPs to report their forecasted thousand block demand.
- d) Block Protection Date - The deadline for SPs to “protect” specified thousand blocks (those with up to 10% contamination) from further contamination.
- e) Block Donation Identification Date - The deadline for SPs to report their surplus/deficiency of thousand blocks to the PA.
- f) PA Assessment of Industry Inventory Pool Surplus/Deficiency – The deadline for the PA to aggregate and evaluate SP thousand block donation information and determine, on a rate area basis, whether there is a surplus of thousand blocks or whether an additional NXX code(s) is required to establish the 9 month inventory. The time interval for this activity should be established at the First Implementation Meeting.
- g) Block Donation Date - The deadline for SPs to donate their thousand blocks.
- h) Pool Start/Allocation Date - The date the PA may start allocating thousand blocks from the industry inventory pool to SPs. This is also the start date for SPs to send requests for thousand blocks to the PA.
- i) Mandated Implementation Date - The date identified by the appropriate regulatory body by which thousand block pooling is to be implemented.

Once a Service Provider has been assigned a 1K Block, INC Guidelines require an interval of 21 days before a telephone number can be assigned to a customer.

Exhibit 2

COMPARATIVE TIMELINE FOR IMPLEMENTATION OF THOUSANDS BLOCK POOLING

954 NPA Example

	Theoretical Timeline using NPAC Release 1.4	Commitment Timeline using NPAC Release 3.0
Regulatory Mandate	N/A	TBA
Select Interim Pooling Administrator	Overdue	TBA
First Implementation Meeting	March 30, 2000	June 12, 2000
Forecast Report Date	April 13, 2000	June 26, 2000
Block Protection Date	May 18, 2000	July 31, 2000
Block Donation Identification Date	May 22, 2000	August 2, 2000
Pooling Administrator Assessment of Industry Inventory Surplus/Deficiency	June 12, 2000	August 23, 2000
Block Donation Date	September 11, 2000	November 20, 2000
Pool Start/Allocation Date	September 25, 2000	December 4, 2000
Mandated Implementation Date	September 25, 2000	December 4, 2000
Difference Between Theoretical Release 1.4 and Commitment Release 3.0 Dates	70 Days	

Assumptions:

1. Based on INC 99-0127-023, Thousand Block (NXX-X) Pooling Administration Guidelines, Issued February 28, 2000
2. Non-contaminated Blocks
3. NPAC Release 1.4 versus Release 3.0
4. Pooling Administrator (PA) already selected
5. Pooling Administrator assumed to be NeuStar
6. Use existing interim Pooling Administrator contract
7. Release 1.4 Schedule pushes out if NeuStar cannot meet on March 30, 2000
8. R3.0 First Implementation Meeting date is "derived" and can be held earlier, but earlier implementation meeting date will not allow Mandatory Implementation date to be moved up since it is driven by NeuStar/LLC-established dates

Applicable Definitions from INC Guidelines:

1. Regulatory Mandate - The date of regulatory notification that thousand block pooling is to be implemented.
2. First Implementation Meeting - The meeting held by the PA for all participating SPs to develop the time intervals between the milestones.
3. Forecast Report Date - The deadline for SPs to report their forecasted thousand block demand.
4. Block Protection Date - The deadline for SPs to "protect" specified thousand blocks (those with up to 10% contamination) from further contamination.
5. Block Donation Identification Date - The deadline for SPs to report their surplus/deficiency of thousand blocks to the PA.
6. PA Assessment of Industry Inventory Pool Surplus/Deficiency - The deadline for the PA to aggregate and evaluate SP thousand block donation information and determine, on a rate area basis, whether there is a surplus of thousand blocks or whether an additional NXX code(s) is required to establish the 9 month inventory. The time interval for this activity should be established at the First Implementation Meeting.
7. Block Donation Date - The deadline for SPs to donate their thousand blocks.
8. Pool Start/Allocation Date - The date the PA may start allocating thousand blocks from the industry inventory pool to SPs. This is also the start date for SPs to send requests for thousand blocks to the PA.
9. Mandated Implementation Date - The date identified by the appropriate regulatory body by which thousand block pooling is to be implemented.