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July 3, 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 No. 981444-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. and MCI WorldCom, Inc. are an original and 15 copies of their Response to Motion for Reconsideration of Ms. Arvanitas in the above referenced docket.

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

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self

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08118 JUL-38

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Number Utilization Study: Investigation)
into Number Conservation Measures)
_____)

Docket No. 981444-TP
Filed: July 3, 2000

**RESPONSE OF AT&T AND MCI WORLDCOM TO THE
MOTION FOR RECONSIDERATION OF MS. ARVANITAS**

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. (collectively "AT&T"), and WorldCom, Inc., for itself and its operating subsidiaries ("WorldCom"), through undersigned counsel, herewith jointly submit this response to Peggy Arvanitas' Motion for Reconsideration of Order No. PSC-00-1046-PAA-TP ("Motion") filed with the Florida Public Service Commission ("Commission") on June 19, 2000. For the reasons stated below, this Motion should be dismissed and otherwise not deemed a petition for a hearing on the proposed agency action ("PAA") provisions of Order No. PSC-00-1046-PAA-TP.

1. On May 30, 2000, the Commission issued its Order No. PSC-00-1046-PAA-TP ("Order") adopting a revised number pooling plan, as modified by the code holders that had attended the May 5, 2000, Agenda Conference on this issue. No code holder, carrier, or other interested party has filed with the Commission Clerk a formal protest of this Order. Moreover, the legal assistant for undersigned counsel checked with the Commission Clerk's office after June 19th, and their indication was that no party had filed a petition on the PAA. Accordingly, it should be deemed final agency action with respect to the PAA matters, specifically the number pooling plans for the 954, 561, and 904 NPAs discussed therein.

2. On June 19, 2000, Ms. Arvanitas filed with the Commission a document she labels

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“Peggy Arvanitas’s [sic] Motion for Reconsideration of Order No. PSC-00-1046-PAA-TP.” While there is a certificate of service attached to this document, this certificate does not indicate that a copy was served on undersigned counsel, who has been handling this matter for both AT&T and WorldCom. Moreover, notwithstanding the indication that service had been made on the other parties to the docket, those representatives that undersigned counsel has spoken with have indicated that they have not received a copy of Ms. Arvanitas’ Motion.

3. On June 29, 2000, in response to a call from an attorney on the Commission Staff, late on the afternoon of June 29th undersigned counsel received from the Commission Clerk a copy of Ms. Arvanitas’ June 19th filing. Given the absence of service on undersigned counsel, the times specified in Rules Rule 28-106.103 and 28-106.204 should not apply to this Response. However, in an abundance of caution, this Response is being filed within the 12 days allowed by the applicable rules.

4. To the extent this Motion is seeking reconsideration of any of the PAA provision of the Order, Florida Administrative Code Rule 25-22.060(1)(a) specifically states that the Commission will not entertain a motion for reconsideration of a PAA order. Thus, the Commission should dismiss this Motion.

5. To the extent the Motion goes to a final aspect of the PAA order, which was the denial of Ms. Arvanitas' comments on the original number conservation measures adopted in Order No. PSC-00-0543-PAA-TP, a reconsideration of that decision would be appropriate. But such a Motion has nothing to do with the adoption of the number pooling plan in the Order, and as such the Motion should not be considered any barrier or impediment to the adoption or implementation of the number pooling plan approved by the Order.

6. If by some stretch of the imagination this Motion is somehow a protest of the number pooling plan adopted by the Order, the Motion fails to fulfill the legal requirements for a protest. See 28-106.201, Florida Administrative Code. Accordingly, the Motion should not be considered or deemed a protest of the PAA provisions of the Order.

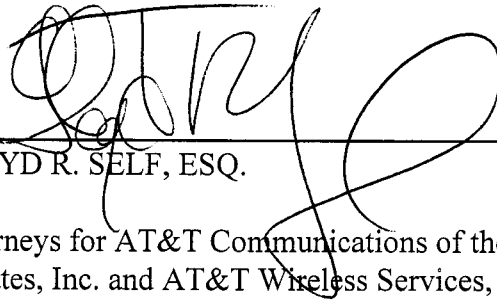
7. AT&T and WorldCom have specific substantive objections to the matters identified in Ms. Arvanitas' Motion. Specifically, there is no basis for reconsidering the rejection of rulemaking for number pooling; the timetable approved for number pooling does address implementation of both Software Release 3.0 and 1.4, in the event 3.0 cannot be implemented; the Commission has not adopted a specific cost recovery plan (cost recovery will be addressed in a later proceeding); and the number pooling plan as adopted specifically provides that the INC guidelines employed will be the most currently approved version (which means if next week a new version is adopted, that will be the version used). In view of the time constraints, the undersigned reserve the right to address the merits of Ms. Arvanitas' issues if there is to be a substantive review of them.

8. Ms. Arvanitas' Motion, and her subsequent communications with the industry and the North American Portability Management LLC, have threatened the timely implementation of the Commission's decision to move forward with number pooling in the 954, 561, and 904 NPAs by casting doubt on the effectiveness of the PAA's provisions with respect to number pooling. Accordingly, we urge the Commission to address this Motion as quickly as possible to resolve any potential delay it may cause.

WHEREFORE, the undersigned respectfully request that the Commission deny the Motion and declare the PAA provisions of Order No. PSC-00-1046-PAA-TP final and effective on June 20, 2000.

Respectfully submitted,

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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 3rd day of July, 2000.

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