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Peggy Arvanitas

August 8, 2000

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Mrs. Blanca S. Bayo
Director of Divisions Record and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Fla. 32399-0850

RE: DOCKET NO. 981444TP (number utilization)

Dear Ms. Bayo

Enclosed is an original and six (6) copies of Peggy Arvanitas Motion to Protest Bellsouth's request for Variance, which I request you file in the above captioned docket.

A copy of this letter is enclosed, that you may stamp "filed" and return to me. Copies have been mailed to the parties listed on the Certificate of Service. Thank-you for your efforts.

Sincerely,
Peggy Arvanitas
Peggy Arvanitas

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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

In RE: Number Utilization Study)
 Investigation Into Number)
 Conservation Measures)

Docket No. 981444TP
 Filed: August 9, 2000

MOTION TO PROTEST BELLSOUTH'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 LAESS 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 LAESS 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.

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6. That to economize (or 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 Sction 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
 RE7 MAX 1st Class
 620 Bypass Dr
 Clearwater, Fla. 33764
 (727) 712-1286

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

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 2nd day Aug, 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/Jeffrey 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

**Executive Office of the Governor
Office of Planning and Budget
General Government Unit
The Capitol, Rm. 1502
Tallahassee, FL 32399-0001**

**Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301
Tel: 850-681-1990
Fax: 850-681-9676**

**Florida Competitive Carriers Assoc.
(Orl)
c/o J.P. Gillan and Associates
P.O. Box 541038
Orlando, FL 32854-1038**

**Florida Public Telecommunications
Assoc.
Angela Green
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525
Tel: 850-222-5050
Fax: 850-222-1355**

**Florida Telephone Assoc.
Susan Langston
P.O. Box 1776
Tallahassee, FL 32302
Tel: 850-877-5141
Fax: 850-878-3471**

**Foley & Lardner Law Firm (DC)
Marcus Williams
3000 K St., NW, #500
Washington, DC 20007
Tel: 202-672-5323
Fax: 202-672-5399**

**Foley & Lardner Law Firm (Jax)
Domenic Altomars
P.O. Box 240
Jacksonville, FL 32202-3527
Tel: 904-359-2000
Fax: 904-564-6001**

**Holland Law Firm
Bruce May
P. O. Drawer 810
Tallahassee, FL 32302
Tel: 850-224-7000
Fax: 850-224-8832**

**Hopping Law Firm
Richard Melson
P.O. Box 6526
Tallahassee, FL 32314
Tel: 850-222-7500
Fax: 850-224-8551**

**Hyperion Telecommunications of
Florida, Inc. (PA)
Lee McDowell
5 W. 3rd St.
Coudersport, FL 16915-9210**

**Intermedia Communications of Florida,
Inc.
Mr. Steven Brown
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel: 813-829-0011
Fax: 813-829-4923**

**International Speedway Corp.
David Hickman
P.O. Box 2801
Daytona Beach, FL 32120-2801
Tel: 904-254-2700**

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