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RECORDS AND
REPORTING

August 21, 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 Response to the Motion to Protest BellSouth's Request for Variance of Ms. Arvanitas, 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,

Michael P. Goggin
Michael P. Goggin

APP
CAF
CMP
COM
CTR
ECR
LEG
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SEC
SER
OTH

Enclosures

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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FPSC-RECORDS/REPORTING

**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 21st day August, 2000 to the following:

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Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 981444-TP

Filed: August 21, 2000

**RESPONSE OF BELLSOUTH TELECOMMUNICATIONS, INC. TO THE
MOTION TO PROTEST BELLSOUTH'S REQUEST FOR VARIANCE
OF MS. ARVANITAS**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to Peggy Arvanitas' Motion to Protest BellSouth's Request for Variance of Number Pooling Implementation ("Motion") filed with the Florida Public Service Commission ("Commission") on August 9, 2000. For the reasons stated below, this Motion should be denied and otherwise not deemed a petition for a hearing on the BellSouth's Request for Variance.

1. On May 30, 2000, the Commission issued its Order No. PSC-00-1046-PAA-TP ("Order") adopting a number pooling plan, as revised during the May 5, 2000, Agenda Conference on this issue. On July 28, 2000, BellSouth filed a Motion for Variance of Number Pooling Requirements for 1AESS Switches, after it learned that the manufacturer of those switches, Lucent, would not develop software to make it possible for those switches to participate in number pooling.

2. On August 9, 2000, Ms. Arvanitas filed the Motion, "protesting" BellSouth's request for a variance for its 1AESS switches. There are a number of irrelevant and incorrect assertions in Ms. Arvanitas' motion. For example, Ms. Arvanitas seems to insinuate, incorrectly, that the 1AESS switches are not LNP-capable, that BellSouth's request would have some impact on any rate center

consolidation that might be proposed, and that other carriers are constrained from competing currently due to an inability to acquire numbering resources. Apart from being untrue and irrelevant, Ms. Arvanitas reckless assertions should be disregarded because she lacks standing to make them.

3. The number pooling order from which BellSouth seeks a variance concerns the 954, 561 and 904 NPAs. Ms. Arvanitas has not asserted that she resides or works in any of the areas within these NPAs, nor is she a telecommunications carrier seeking numbering resources in any of these areas. In short, she has not alleged, much less shown, that she has any substantial interest that would be affected by the outcome in this matter. Accordingly, her Motion should be summarily dismissed.

4. In the event that the Commission declines to disregard her Motion due to her lack of standing, Ms. Arvanitas' motion nevertheless should be denied for lack of merit. As shown in BellSouth's Motion for Variance, the implementation of number pooling in each of the affected NPAs would not be delayed by the variance BellSouth requests. In addition, granting the requested variance will not materially impact the effect of number pooling in these NPAs as the variance would only apply to a small minority of switches in these NPAs, containing relatively few blocks of numbers that might otherwise have been eligible for donation, and BellSouth would continue to comply with the Commission's thousand block number management requirements with respect to those switches. Accordingly, when the switches are replaced, eligible thousand blocks would be contributed to the pool at that time.

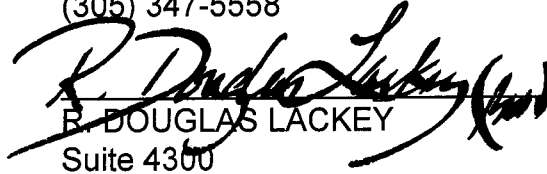
For the reasons stated above, BellSouth respectfully requests that the Commission deny the Motion.

Respectfully submitted this 21st day of August, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.


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