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March 9, 2001

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RECORDS AND
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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 010102-TP
Investigation of Proposed Updates to the Routing Data Base System (RDBS)
and Business Rating Input Database System (BRIDS) Affecting the Tampa
Telecommunications Carriers

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s
Prehearing Statement in the above matter. Also enclosed is a diskette with a copy
of the Prehearing Statement in Word 97 format. Service has been made as indicated
on the Certificate of Service. If there are any questions regarding this matter, please
contact me at 813-483-2617.

Sincerely,

Ernesto Mayora Jr

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of Proposed Updates to the)
Routing Data Base System (RDBS) and Business)
Rating Input Database System (BRIDS) Affecting the)
Tampa Telecommunications Carriers)
_____)

Docket No. 010102-TP
Filed: March 9, 2001

VERIZON FLORIDA INC.'S PREHEARING STATEMENT

Verizon Florida Inc. (Verizon) files its Prehearing Statement in accordance with the Commission's Order number PSC-01-0380-PCO-TP, establishing procedure in this docket.

A. Witnesses

Verizon's witness for all issues identified in this proceeding is Beverly Y. Menard.

B. Exhibits

The following exhibits are attached to Ms. Menard's Direct Testimony:

- Exhibit BYM-1, August 2000 notification of RDBS and BRIDS updates.
- Exhibit BYM-2, Tampa rate centers and calling scopes.
- Exhibit BYM-3, Tampa zip codes.
- Exhibit BYM-4, ALEC Codes in 813 exchange.
- Exhibit BYM-5, GTE exchange boundary map.

The following exhibit is attached to Ms. Menard's Rebuttal Testimony:

- Exhibit BYM-6, Verizon calling scope changes if Tampa rate centers were consolidated.

C. Verizon's Basic Position

The issues in this proceeding have arisen largely because of fundamental misconceptions relative to Verizon's five Tampa rate centers, which have existed for over 30 years. Verizon is not converting, expanding, or changing these currently tariffed Tampa rate centers. It is only correcting the RDBS system and its output products to

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correspond to its switches and its tariff. These corrections will not change the alternative local exchange carriers' (ALECs') calling scopes or cause any other significant impacts for the ALECs. Verizon would not oppose a number pooling trial in the Tampa Metropolitan Statistical Area (MSA) to alleviate any concerns about the effect of multiple rate centers on numbering resources, but any additional conservation measures should be considered only in the context of the ongoing generic number conservation docket.

D., E., and F. Verizon's Positions on Specific Issues

Verizon considers each issue in this proceeding to be a mixed question of fact, law, and policy.

Issue 1: Should the Tampa Market Area be considered one rate center? If not, what rate centers should be associated with the Tampa Market Area?

Verizon's Position: No. Verizon's five Tampa rate centers, which have existed for over 30 years, should be maintained.

Issue 2: How would multiple rate centers impact the numbering resources in the Tampa Market Area?

Verizon's Position: If ALECs wish to serve customers located in all five existing Tampa rate centers, they would require NXX codes in each of those rate centers. Because Verizon believes most ALEC customers are located in the Tampa Central rate center, the impact on numbering resources may well be relatively insignificant. In any event, Verizon would agree to thousand block number pooling to help conserve numbering resources in the 813 area code.

Issue 3(a): What effect will Verizon's changes to its Routing Database System (RDBS) and Business Rating Information Database System (BRIDS) have on other telecommunications carriers in the Tampa Market Area?

Verizon's Position: Carriers will need to determine which Tampa rate center their customers occupy. Verizon has provided the ALECs with a number of documents to assist them to identify the proper rate centers for their customers.

Issue 3(b): What effect would one or more rate centers have on telecommunications carriers in the Tampa Market Area?

Verizon's Position: Verizon's recognition of the existing five rate centers in the LERG/RDBS will have no immediate impact whatsoever on ALECs. There have been no changes to rating or routing as a result of Verizon's recognition of the existing Tampa rate centers. The ALECs' existing calling scopes will remain the same. Moreover, existing ALEC customers should be grandfathered in the Tampa Central rate center as long as they stay with that particular ALEC. Any new NXX codes would need to be established with the correct Tampa rate center designation.

Issue 4: Should a number pooling trial be implemented in the Tampa Metropolitan Statistical Area (MSA)? If so, when should the number pooling trial begin?

Verizon's Position: Verizon is not opposed to a number pooling trial in the Tampa MSA. Verizon believes it could be ready to implement a pooling trial six months after a Commission order establishing such a trial.

Issue 5: What other number conservation measures, if any, should the Commission order in the Tampa Market Area? If so,

- (a) When should these measures be implemented?
- (b) How should the cost recovery be established?

Verizon's Position: The Commission should not consider implementation of any number conservation measures other than the above-discussed pooling trial. Under FCC decisions, a number of conservation measures are already being implemented nationwide. To the extent this Commission wishes to go beyond those measures, it should consider doing so only in the context of the generic docket established for that purpose (Docket No. 981444-TP), so that all interested parties can participate and potential conservation measures can be considered on a statewide basis.

Issue 6: Should Verizon be ordered to implement rate center consolidation in the Tampa Market Area? If so,

- (a) How many rate centers should be consolidated? And if so, how should it be implemented?
- (b) When should the rate center consolidation be effective?
- (c) Should Verizon be allowed to recover its costs upon consolidation of its rate centers in the Tampa Market Area? If so, how?

Verizon's Position: Verizon should not be ordered to implement rate center consolidation. Consolidation of rate centers would require the Commission to mandate extended area service, which it cannot do under Florida law. Issues concerning the Commission's jurisdiction to order rate center consolidation and the proper means of recovering the costs and revenue losses associated with rate center consolidation should be considered in the generic docket number 981444-TP, which was intended to address just such issues.

Issue 7: Should Verizon be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems? If so, should Verizon be required to file a revised tariff reflecting one Tampa Rate Center?

Verizon's Position: No, Verizon should not be required to undo the RDBS and BRIDS systems changes. As noted, the Commission lacks the jurisdiction to require consolidation of all Tampa rate centers, and, of course, no rate center consolidation may be implemented without full recovery of costs and revenue losses.

G. Stipulated Issues

No issues have been stipulated by the parties.

H. Pending Matters

There are no Verizon motions or other matters upon which Verizon seeks action.

I. Confidentiality Claims

Verizon has no outstanding requests or claims for confidentiality of any information that has been submitted in this case.

J. Procedural Compliance

At this time, there are no procedural requirements with which Verizon cannot comply.

K. Pending FCC or Court Actions

Verizon is unaware of any pending FCC or court actions that may preempt Commission action in this docket or that may affect the Commission's ability to resolve any of the issues presented in this docket. Verizon cannot, however, definitively answer this question without knowing what action the Commission may eventually take in this proceeding.

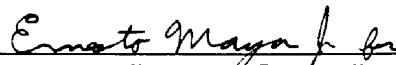
Respectfully submitted on March 9, 2001.

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Attorney for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Prehearing Statement in Docket No. 010102-TP were sent via U.S. mail on March 9, 2001 to the parties on the attached list.



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