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May 10, 2002

BY HAND DELIVERY
Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 010963-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. are an original and fifteen copies of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc.'s Comments 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,

Tracy W. Hatch

TWH/amb
Enclosures
cc: Virginia Tate, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Telecommunications) Rate Center Consolidation in the State of) Florida)	Docket No. 010963-TP
)	Filed: May 10, 2002

COMMENTS OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC, and TCG SOUTH FLORIDA, INC

AT&T Communications of The Southern States, LLC, and TCG South Florida, Inc. (collectively "AT&T") respectfully file the following comments in response to the Florida Public Service Commission ("Commission") request at its Workshop conducted March 15, 2002, regarding the Commission's investigation into Rate Center Consolidation.

1. AT&T firmly supports Rate Center Consolidation ("RCC") as a tool to make the management and use of numbering resources more efficient. As was noted by the Florida Rate Center Consolidation Working Group Report filed with the Commission September 28, 2000, there are clear competitive benefits to the implementation of RCC through making more numbers available to carriers. A copy of the Report is attached as Exhibit 1. AT&T submits that the Commission should move forward with the implementation of RCC.

2. Some parties have claimed that the Commission may lack the authority to require RCC. AT&T submits that the Commission has adequate statutory authority in Chapter 364, Florida Statutes. The statutory basis for the Commission's authority for RCC was clearly presented in the Commission Staff recommendation in Docket No.

010102-TP filed June 28, 2001. AT&T notes that the Commission did not resolve the legal basis for RCC in that case, deferring it to a generic proceeding. The question is presented *de novo* in the instant docket. Notwithstanding, the statutory basis for Commission jurisdiction presented by the Staff in its recommendation is sound.

3. The flaw in the ILECs' argument as to lack of Commission authority is their tying RCC to the rates that the ILECs' end-users pay for their local calls. The local calling scope for a customer is a billing concept. Rate Centers do not mechanically control the local calling scopes or the rates for such calling scopes. Rate centers provide information that can be used in a billing determination, but the decision as to whether a call is local, toll or otherwise is a definitional determination that rests with the end-user's local carrier independent of the 'rate centers' involved. To accept the ILECs argument on its face, would require that all modifications to the rates that end-users pay for a 'local' call through such means as extended area service (EAS), extended calling service (ECS), or optional extended area service (OEAS) could only have been accomplished by consolidating the rate centers involved or at least physically changing the exchange boundaries to accommodate the price changes for changing the definition of a call from toll to local. This is plainly contrary to the ILECs historic behavior and logic. AT&T submits that the Commission has ample authority to implement RCC, independent of any end-user rate issues.

4. AT&T supports RCC as a way to more efficiently manage code resources and assist new entrants into the market place. Further, the Commission has ample statutory authority to implement RCC.

Respectfully submitted this 10th day of May, 2002.

AT&T COMMUNICATIONS OF THE SOUTH LLC and TCG SOUTH FLORIDA, INC.

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FLORIDA
RATE CENTER CONSOLIDATION WORKING GROUP REPORT

SEPTEMBER 28, 2000

EXHIBIT 1

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I. EXECUTIVE SUMMARY

As a result of the increased focus on various methods to optimize the use of telephone numbers and the additional authority granted to the Florida Public Service Commission (FPSC), the goal of the Rate Center Consolidation (RCC) working group was to examine the feasibility of RCC as one of the means to increase the utilization of telephone numbers and to identify a methodology that could be used for RCC studies and to identify the pros and cons of RCC. This report considers RCC and does not evaluate any impact of other number conservation measures used in conjunction with RCC.

This report provides a possible proposal for RCC for the 305/786, 407/321, 561, 727, 813, 904 and 954 NPAs. As discussed in the report, there are several implementation issues that must be addressed when implementing RCC. The working group believes RCC will provide some extended life of the area codes identified above. However, the possible extension of the area code life will be directly related to the number of NXX codes available when the specific RCC proposal is implemented.

Carriers support the number conservation goal of RCC; however, there is question in regards to whether the FPSC has the authority to order implementation of RCC. In addition, as to revenue neutrality and cost recovery, the parties' positions range from the view that existing price cap mechanisms cover the revenue loss and cost of implementing RCC to the view that the revenue loss and the cost of RCC must be offset by rate increases.

II. BACKGROUND

The North American Numbering Plan (NANP), which governs the assignment and use of telephone numbers in North America and other World Zone 1[1] Countries, was introduced in 1947 by AT&T. The plan is based on a destination code in which each main telephone number in the NANP is assigned a specific address or destination code. The destination codes are commonly referred to as telephone numbers. NANP telephone numbers are in a 10-digit format, consisting of a 3-digit Numbering Plan Area (NPA) code, a 3-digit Central Office code, and a 4-digit station address code. The NPA code is commonly known as the area code, and the Central Office Code is commonly known as the NXX code. NeuStar is currently the code administrator with the responsibility of assigning area codes within the NANP and the assignment of central offices codes within that NPA. The code administrator is required to follow guidelines adopted by the Industry Numbering Committee when assigning either NPAs or Central Office Codes.

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[1] World Zone 1 Countries consist of Anguilla, Antiqua and Barbuda, Commonwealth of the Bahamas, Barbados, Bermuda, British Virgin Islands, Cayman Islands, Canada, Dominican Republic, Grenada, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Turks and Caicos Islands, Trinidad and Tobago, and the United States of America, including Puerto Rico and the Virgin Islands.

In the late 1950s it became apparent that NPAs were being assigned at a rate significantly higher than originally anticipated. Out of that early concern came a plan to expand the supply of numbers through the introduction of interchangeable codes. The introduction of interchangeable codes modifies the format previously used for area codes and central office codes. The previous format for area codes was N, 0/1, X, while the central office code format was NNX.[2] Currently, the interchangeable area codes and central office codes take the format of NXX. The industry began the implementation of interchangeable Central Office codes in 1974. In January 1992, BellCore notified the telecommunications industry that interchangeable NPAs would be introduced in early 1995. Prior to the introduction of interchangeable NPAs, the NANP had 160 NPAs, which provided a total of 1.28 billion available telephone numbers for assignment. The introduction of interchangeable NPA codes provided an additional 640 NPAs, which provide a total of 6.4 billion telephone numbers available for assignment.

Technology has opened the door for new services that require numbers. For example, the Personal Computer (second line), Fax machines, voice mail, cellular/PCS, Pagers, alarm systems, and the Internet to name a few, use numbers. Fifteen years ago most of these services did not exist. Fifteen years ago the average household had only one telephone line. Today, the average household may have up to six services that use numbers. For example, one main line, a second line for the PC, a pager, a Fax line, and two wireless phones equating to six phone numbers being used in one household. Competition has also created service provider demand for NXX codes. The end result is a rapid exhaust of area codes.

Each NXX code is associated with a switch that corresponds to a certain rate center. Rate centers are designated geographic locations that have certain assigned vertical and horizontal (V&H) coordinates within an area code. In most cases, service providers are allocated telephone numbers at the NXX level, on a per rate center basis. For billing purposes, the rate centers are used to determine whether a call is local or toll and to compute the distance for the toll call. Many carrier billing systems rely on NPA-NXX code information to rate calls. In order to mirror the rate centers of the Incumbent Local Exchange Companies (ILECs), many Alternative Local Exchange Carriers (ALECs) request at least one NXX block consisting of 10,000 numbers in each rate center. As stated before this demand has contributed to the rapid exhaust of area code in Florida.

On October 29, 1998, the Florida Public Service Commission (FPSC) opened Docket No. 981444-TP to investigate number utilization and possible number conservation mechanism that would hopefully decrease the alarming rate at which area code exhaust was occurring in Florida.

On April 2, 1999, the Florida Public Service Commission filed a petition with the Federal Communications Commission (FCC) seeking authority to implement various number

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[2] N is defined as any number from 2 through 9, and X is defined as any number from 0 through 9.

conservation measures, which would help minimize consumer confusion and expenses associated with imposing new area codes too frequently.

On September 15, 1999, the FCC issued Order No. FCC 99-249 granting in part the FPSC's Petition for Delegation of Additional Authority to Implement Number Conservation Measures. In its Order, the FCC granted the FPSC interim authority to:

(1) Institute thousand-block pooling by all LNP[3]-capable carriers in Florida;
(2) Reclaim all unused and reserved NXX codes;
(3) Maintain rationing procedures for six months following area code relief;
(4) Set numbering allocation standards;
(5) Request number utilization data from all carriers; and
(6) Implement NXX code sharing.

With respect to RCC, the FCC stated, "Rate center consolidation, as it involves matters relating to local calling scopes and local call rating, falls under state utility commission's rate-making authority. However, since rate center consolidations have the potential to increase the efficiency of utilization of numbering resources over which we have plenary jurisdiction, we grant the Florida Commission's request for any additional authority it may need to consolidate rate centers since such consolidations will aid the Commission's efforts in optimizing the use of numbering resources."

In October 1999, the FPSC staff and the industry established the Florida Number Conservation Steering Committee. The Committee established five (5) Number Conservation Working Groups, Legal, Rate Center Consolidation, Number Pooling, Short Term Conservation Measures, and Code Sharing. The working groups were to address the interim number conservation authority granted to the FPSC by the FCC. The Rate Center Consolidation (RCC) Working Group's goal was to examine the feasibility of RCC as a means to optimize the use of telephone numbers and to identify a methodology that could be used for RCC studies.

On March 31, 2000, the FCC issued Order No. FCC 00-104 addressing numerous Numbering Resource Optimization measures ranging from the development of a national number pooling framework to the development of monitoring mechanisms to evaluate number usage by code holders.

III. FLORIDA COMMISSION AUTHORITY CONCERNING RCC

There are ranges of opinions concerning whether the FPSC has the authority to require carriers to implement RCC. Carriers support the number conservation goal of RCC;

[3] LNP (Local Number Portability) is a service that provides residential and business telephone customers with the ability to retain, at the same location, their existing telephone numbers when switching from one local telephone service provider to another.

however, there is question in regards to whether the FPSC has the authority to order implementation of RCC. The ILECs would support implementing RCC provided the FPSC allows for revenue neutrality and full cost recovery. The issue of revenue neutrality and cost recovery varies by party.[4] The position of the parties range from the view that existing price cap mechanisms cover the revenue loss and cost of implementing RCC to the view that the revenue loss and the cost of RCC must be offset by rate increases.

IV. DEFINITION OF RATE CENTER

Rate Centers were established to identify a fixed point within each exchange that could be used to ensure consistent mileage measurements between exchanges and to ensure consistent billing for long distance services. Section 1 of the Local Exchange Routing Guide (LERG) defines 'rate center' as a "uniquely defined geographical location within an exchange area (or a location outside the exchange area) for which mileage measurements are determined for the applications of interstate tariffs."

Every NXX that is assigned to a service provider (wireline or wireless) is associated with a rate center. Even though wireless carriers may serve different geographic areas than wireline carriers, calls are still rated based on the rate center designation in the LERG associated with that NXX. Thus, even though the concept of rate center is often associated with a specific geographic boundary, a rate center is defined to be a geographic location within a specified exchange area.

V. RATE CENTER CONSOLIDATION METHODOLOGY

The working group's initial approach was to provide a statewide RCC proposal. However, after the submission of some of the ILECs' first RCC proposals, it became apparent that the rate payer and shareholder financial impact of RCC in Florida would be significant. Therefore, the working group modified its approach and believed it would be more beneficial to focus the analysis of the group's efforts in specific NPAs. As would be expected, the working group believes the benefits of RCC will best be realized in those NPAs with the largest demand for numbering resources. The working group redirected its focus of its RCC analysis on the 305/786, 407/321, 561, 727, 813, 904, and 954 NPAs.[5]

The working group reached consensus on the following assumptions as the basis for an RCC analysis. The assumptions are defined below and are categorized by Proposal Definition, NXX impact analysis, and Revenue Impact Analysis.

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4 WorldCom supports implementation of RCC provided the FPSC allows for revenue neutrality.

5 Appendix A includes other NPAs. The revenue impact identified in Section VII C includes all NPAs in Appendix A.

A. Proposal Definition Assumptions

The core assumptions to be used for the development of a RCC Proposal are:

1. Proposals considered do not decrease customer's existing local or extended calling areas;
2. Proposals considered conform to current NPA & LATA boundaries (except where existing local calling areas are interLATA);
3. For any area, a proposal that consolidates only exchanges with the same local calling area would always be considered.
4. Proposals take into consideration community of interest.
5. Rural Carriers should not be considered in rate center consolidation unless requiring consolidation would significantly impact the life of an area code.
6. Rural Carriers may be impacted by any RCC proposal of other carriers.
7. Proposals should not combine inter-company exchanges.
8. Proposals should have consistent rate centers among all carriers.
9. Proposals should avoid any 911 impacts (additional costs, porting problems, and default rerouting)
10. Proposals considered may result in new local/EAS or ECS routes.
11. Number Pooling impact is not considered in the RCC proposals.

B. NXX Impact Analysis Assumptions

For the purpose of this report, the following assumptions are used to establish the impact of rate center consolidation, prior to pooling, on NXX assignments:

1. Alternative local exchange carriers (ALECs) would still require an NXX per rate center;
2. Rate center consolidation will have minor affect on how wireless carriers obtain NXXs and should not be considered as part of this analysis.
3. NXX analysis assumes that NXXs can be shared across switches of the same carrier providing service within the rate center. In a number portability environment and a number-pooling environment this capability is assumed to exist.
4. For multi-switch wire centers within a rate center, a NXX savings for each wire center is assumed.
5. For LECs with one NXX currently assigned, a fill rate of 25% was assumed. The table below illustrates the methodology for determining the impact of RCC on NXX assignment. For example, in Table 1, without RCC, LEC A has one NXX per rate center for 10 rate centers. Based on the assumption of a 25% fill rate, if the 10 rate centers were consolidated into one rate center, the additional telephone numbers for assignment, with RCC, would be:

TABLE 1

NXX Impact	# of Rate Centers	NXXs assigned to LEC A	Additional TNs Available for LEC A Assignment
Without Consolidation	10	10	N/A
With Consolidation	1	2.5	75,000

6. For LECs with more than 1 NXX assigned in an existing rate center, it is assumed all NXXs prior to the last NXX have 100% utilization. The last NXX in a rate center is assumed to have a fill of 25%. For example, in Table 2, in a 10 rate center alternative, if LEC A has two NXXs in one rate center and one NXX in the remaining rate centers, the impact on NXX assignments would be calculated as:

TABLE 2

NXX Impact	# of Rate Centers	NXXs Assigned to LEC A	Additional TNs Available for LEC A Assignment
Without Consolidation	10	11	N/A
With Consolidation	1	3.5	75,000

7. The study assumes that NXXs can be shared across host/remote arrangements.
8. To determine the impact of RCC on future growth, an ALEC growth rate of 15% a year is assumed. This growth rate represents the rate of NXX assignment prior to ALEC requesting NXXs.

C. Revenue/Cost Impact Analysis Assumptions

1. Source for initial revenue data to determine magnitude of revenue impact should be the local, toll, and access billing data.
2. IXC revenue loss has not been considered in this analysis.
3. A fundamental assumption is that all customers within a consolidated area will have the same local calling area and be affected by the same community calling plans. No exchange will lose any local calling, and any point that is now local to any of the exchanges in a new consolidated rate center will be local to all of the new rate center.
4. Revenue losses from services such as FX and FX/CO arrangements are not included in this analysis.
5. Lost reciprocal compensation revenue from increased ISP traffic is not considered.
6. Revenue impact for each consolidation proposal is impacted by the total consolidation. For example, as indicated in Appendix A, the ECS and toll revenue impact of Broward County (954 NPA) is approximately 3-4

million per month. This revenue figure may be impacted by other consolidation alternatives within the 305/786 or 561 area codes due to overlapped calling. Thus, the revenue impacts will have to be refined if a subset of proposed consolidations within each NPA is eliminated from consideration.

7. No stimulation factor for increased calling has been applied to consolidations that will result in a conversion of toll to extended local calling.
8. Cost impacts due to increased local trunking requirements, including ISP traffic, are not considered, except for Sprint. (See footnote 10)
9. Investments for central office, outside plant, trunking, and expenses for translations, directory, customer education, administration, and billing system changes should also be considered.

VI. GENERAL RATE CENTER CONSOLIDATION ANALYSIS

A. Technological Impact

RCC may require upgrades to current technology. Any impacts should be evaluated and identified prior to implementation of RCC. At this time, no specific technological impact has been identified.

B. Billing Impact

Though many wireline and wireless carriers currently offer optional calling plans that are usage, not mileage sensitive, most traditional toll and expanded local calling rates are mileage sensitive and driven by the mileage between the originating and terminating rate centers. When bills are generated for customers using these services, the identifying name of the rate centers is passed "downstream" along with the appropriate mileage information, in order to generate an accurate accounting of each call. If rate centers were consolidated, and no modifications were made to current billing systems, then the newly identified rate center would appear on a customer's bill. The originating and terminating point of each toll or expanded local call and the mileage used to rate each call would be calculated based on the coordinates of the new rate centers.

In today's environment, NPA-NXX codes, once assigned, are entered into a national rating database referred to as the Business Rating Input Database System (BRIDS). BRIDS is one of four key databases used by the industry for network routing and rating information. BRIDS is primarily responsible for producing two outputs, the Terminating Point Master (TPM) and the V&H Coordinate Data (VHCD). These products are used primarily for billing verification, call rating and send-to billing. Data entries in BRIDS, that are required prior to the activation of each NXX, insure that these functions are performed accurately. These data entries include, but are not limited to, a "Place Name" and a "Rate Center Name." The Place Name is used to indicate the originating and terminating point of a toll or expanded local call that appears on a customer's bill; however the Place Name is not used to calculate call rating. Typically, the Place Name

and Rate Center Name reference the same exchange name. This working group believes it would not be practicable to maintain distinct Place Names and Rate Center Names. Because this may result in a Name Change appearing on the customer bill, customer education should be used to minimize the potential customer confusion.

C. Impact on Operational Support Systems (OSS)

RCC will cause some changes to OSS. RCC will cause certain modification and manipulation of internal data files, tables, databases and other records containing NPA-NXX information. Each carrier will have to evaluate the modifications for their specific OSS. Human resources will be necessary to perform data changes and update systems to implement RCC. This modification will require some level of cost to make the necessary changes.

D. Impact on Switching and Trunking

RCC impacts CO switching, translations, and trunking costs only due to increased call stimulation. It may even drive some switch replacements. The premise is that overall call volumes will increase wherever (1) toll becomes local or expanded local calling or, (2) expanded local area calling becomes local.

It obviously takes more switch terminations, trunk circuits and facilities to accommodate larger call volumes. This portion of the analysis assumes that all CO switching and trunking costs result from call stimulation. RCC may indirectly drive switch generic upgrades depending on the switches NXX-limitation for various functions. These switching and trunking requirements would need to be evaluated by each company. As would be expected, these modifications could be very costly.

E. Impact on E911

Generally, when an E911 call is placed, the call and caller's telephone number identified through the Automatic Number Identification (ANI) is routed via the caller's end office to the E911 tandem office. The ANI is sent from the tandem to the Public Safety Answering Point (PSAP) and the PSAP consults the Automatic Locations Identifier (ALI) database to determine the location information of the caller. ANI failures are uncommon. ALI errors are more common because such errors are driven by order processing errors that can result in a new telephone number receiving dial tone prior to entry into the E911 databases. Because the ALI database updates the E911 Tandem selective routing databases, an error in the ALI results in incorrect routing data. When either ANI or ALI information is unavailable to properly route an E911 call default routing becomes essential to routing the emergency call.

BellSouth default routes E911 calls based on an Emergency Service Number (ESN) assigned to the incoming trunk group from the end office to the E911 tandem switch. The ESN designates the default PSAP to receive the call in the event of a routing failure, and only one ESN can be assigned to each trunk group by the selective router software.

Moreover, utilizing BellSouth's current switches each trunk group can represent only one NPA. Because rate centers currently serve limited geographic areas, the default PSAP should be in relatively close proximity to the calling party's location.

RCC jeopardizes current E911 default routing mechanisms, particularly for emergency calls originated by certain ALEC customers. Typically, ALECs serve a larger geographic area with a single switch; thus, it is likely that the ALEC may choose to use the same NPA/NXX in several exchanges once the exchanges are consolidated into one rate center. Therefore, any RCC implementation proposal should include the PSAP providers throughout the state.

F. Local Exchange Routing Guide (LERG)

The LERG is the industry reference document for call routing details. The LERG is an output product of an underlying national database called the Routing Database System (RDBS). Each NXX is entered into RDBS with an association to one and only one Rate Center. With RCC the Rate Center associated with every affected NXX must be changed in RDBS. These changes are made on-line for each central office code (NXX) by the Administrative Operating Company Number (AOCN) designated by the Code Holder of the NXX.

G. Access to Numbering Resources

In FCC Order No. 00-104, carriers are required to file rate center level information to obtain additional numbering resources for growth. The requirement may limit the ability of a carrier in a rate center that has multiple switches to receive numbering resources to serve its customers. For example, in the FCC Order, growth codes will be assigned as a carrier demonstrates that its available numbers on a rate center basis is less than 6 months-to-exhaust (MTE).[6] If Switches A and B are in a given rate center, and Switch A's MTE is 4 months, Switch B's MTE is 10 months, and the rate center's MTE is 8 months, the numbering administrator will not issue additional numbering resources to serve customers in Switch A until the rate center MTE is less than 6 months. Depending on the technology deployed in the rate center, customers may not be able to receive service due to the lack of numbers in Switch A. This potential problem of having access to numbering resources would be increased with the implementation of RCC. Therefore, any RCC proposal should consider any potential adverse impact to a carriers ability to access numbering resources.

6 Reporting requirements for growth codes will vary by whether the carrier is pooling or not.

H. Implementation Considerations and Requirements

Implementation of RCC should take into consideration the following items:

a. Develop an implementation schedule/timeline
b. Develop any OSS, Billing and Network modifications due to the RCC proposal
c. Complete CO Code Administration changes
d. Complete dialing plan and trunk translations
e. Complete testing
f. Evaluate and complete any E911 impacts that may need to be addressed
g. Revise tariffs
h. Provide customer and employee education
i. Develop a cost recovery/revenue neutrality method

The impact on carriers for the items in this section will vary depending on the modifications necessary to implement the RCC proposal. Any requirement should provide sufficient time for the carriers to implement RCC in a timely manner and provide sufficient testing and customer notification to minimize any adverse impact.

VII. AREA SPECIFIC ANALYSIS

Using the methodology described above the working group provides the following analysis of the 305/786, 407/321, 561, 727, 813, 904, and 954 NPAs.

A. Proposals

Appendix A provides the RCC proposals for the area codes identified above. As discussed above, any proposal can be modified to address cost, adverse technical impacts, or specific issues raised by any party. The specific proposals were developed to provide a possible RCC plan that could be implemented to minimize the current area code exhaust.

B. NXX Impact Analysis

The NXX impact analysis is based on the assumptions discussed in Section V above. The potential impact on NXXs in a given NPA is threefold. First, RCC will impact the use of NXXs that are already assigned to specific carriers. Second, RCC will impact the assignment of future NXXs in Florida to new ALECs. Third, RCC will impact the assignment of future NXXs to existing LECs.

The potential impact of RCC on currently assigned NXXs is shown in Table 3.

TABLE 3

NPA	NXXs Assigned to LECs Prior to RCC	NXXs Required for LECs After RCC	Available Telephone Numbers
305/786	612	501.25	1,107,500
407/321	353	243.50	1,095,000
561	383	285.75	972,500
727	169	152.50	165,000
813[7]			
904	306	231.75	742,500
954	392	316.75	752,500

Backup data is in Appendix B

Based on the 25% fill assumption, the analysis above indicates that there is a potential savings of over 17 NXX codes for each NPA reviewed in this report.

The second part of the NXX analysis is the impact of future code assignments to new ALECs. Table 4 depicts the potential impact for a initial code assignment for a given NPA.

TABLE 4

NPA	Rate Centers (Before/After)	Number of ALECs	15% Increase of ALECs by Year	ALECs NXXs Assigned by Year before RCC	ALECs NXXs Assigned by Year after RCC
305/786	11/2	39	6	66	12
407/321	6/2	32	5	30	10
561	14/5	20	3	42	15
727	4/2	18	3	12	6
813[7]	4/2				
904	23/8	19	3	69	24
954	5/1	29	5	25	5

Note: Numbers Columns 4, 5, and 6 in this table have been rounded.

Assuming an assignment rate of 15% (see assumptions), NXX code assignments would decrease in the range of 20-40 % depending on the specific NPA.

7 Due to the designation of the Tampa rate center in the LERG, it is impossible to identify the assignment of ALEC NXXs with the Tampa rate centers identified in Verizon's Florida tariff. It is anticipated that the LERG will be modified in February 2001 to remedy this problem.

The third part of the NXX analysis is the impact of RCC on the future assignment of NXXs to existing LECs. Due to the lack of information associated with LECs future numbering resource needs, it is impossible to evaluate this potential impact of RCC.

With the potential availability of telephone numbers as illustrated above, it is clear that RCC will initially reduce existing LECs demand for new NXXs.

The analysis above indicates RCC will not only better utilize the existing NXXs but will also reduce the future assignment of NXXs to new ALECs in the given NPAs.

Tables 3 and 4 illustrate the impact of RCC based on the specific proposal for each NPA and the assumptions listed in Section V of this report. The impact of RCC is for illustrative purposes only. It should be noted the impacts of RCC will be different if any assumption is not realized or the RCC proposals are changed in some manner.

C. Revenue/Cost Impact Analysis

For the proposal developed in Section A, the revenue impact per NPA is shown in Table 5.

TABLE 5

NPA	REVENUE LOSS BY YEAR*
305/786	$29,000,000
407/321	$10,700,000
561	$25,100,000
727	$7,500,000
813	$6,500,000
904	$5,900,000
954	$44,900,000

* Amounts are rounded to the nearest $100,000

The approximate impact for the entire plan is $149.5 million a year[8] for BellSouth[9], Sprint[10], and Verizon. The revenue impact only gives a magnitude of the financial impact RCC will have on the industry. It doesn't address every financial impact that may occur as a result of implementing RCC such as the cost to implement[11], loss revenue for

8 The revenue impact does not include the losses associated with other ILEC consolidations. BellSouth did not include in its revenue impact the consolidations of Sprint and Verizon.

9 BellSouth only included ECS and toll revenue when determining its revenue loss.

10 Sprint revenue losses only reflect the proposed Sprint RCCs for Orange and Osceola counties in the 407 NPA. No revenue losses have been developed for the proposed BellSouth and Verizon RCCs.

11 For example, Sprint estimates its additional trunking costs in capital dollars for the Orange and Osceola county RCCs to be approximately 16%. The trunking cost does not include the impact of ISP traffic.

tariff services, potential increase in reciprocal compensation, and financial savings that result from not implementing additional area codes.

D. Customer Impacts

Rate Center Consolidation may change the location identification that a customer normally sees on their bills. This may initially cause some customer confusion and will require customer education efforts. In addition, the implementation of RCC on a revenue/cost neutral basis will likely result in an impact of customers rates.

VIII. RATE CENTER CONSOLIDATION, THOUSAND-BLOCK NUMBER POOLING AND NUMBER PORTABILITY

It is generally believed that the assignment of numbers to service providers in finer granularity than blocks of 10,000 – that is, in blocks of 1000 or by individual telephone number – will improve utilization of numbering resources. The industry is currently in the process of implementing thousand-block number pooling in the Ft. Lauderdale, West Palm Beach, and Jacksonville MSAs. Thousand block number pooling is an assignment and administration process, which allocates thousand blocks within the same NXX to a shared reservoir (pool) associated with a designated geographic area. The industry is scheduled to begin implementation of thousand-block number pooling on January 22, 2001.

There are two fundamental assumptions underlying thousand block pooling: 1) the size of the pool will be restricted to rate centers and, 2) permanent number portability is required for thousand block number pooling.

Pursuant to the FCC Number Optimization Order, the size of pools will be restricted to a rate center. Pools associated with a large rate center will result in larger reservoirs of numbers to be used for thousand block pooling because more numbers will need to be in the pool to handle the demand for numbers over the large geographic area. In addition, telephone numbers will be used more efficiently by service providers in that the numbers will be utilized over a broad geographic area, thereby increasing the fill rate of the thousand block assigned to the service provider. Logically, RCC will result in large rate centers, and thus, should result in more efficient number pooling

IX. CONCLUSIONS

Clearly, the future assignment rate of NXX codes could be reduced if fewer rate centers existed. The combination of competition and technology need for additional numbers and the large number of rate centers in the various area codes has resulted in NXXs being assigned at an extremely fast pace. The analysis illustrates that fewer NXXs (number depends on specific alternative) would have been assigned in the various area codes if fewer rate centers existed. However, the benefits of RCC will decrease if RCC is done late in the life of the NPA. The greatest benefit is realized when the consolidation is done

at the beginning of the NPA life cycle. It should be noted that the benefit of RCC would also increase if number pooling is implemented in the same geographic area as RCC.

Most, if not, all carriers support the implementation of RCC. However, the main issue for the ILECs is the ability for the implementation of RCC on a revenue and cost neutral basis and ALECs on a revenue neutral basis. Respectively, if revenue and cost neutrality were possible, carriers would implement RCC voluntarily. It is unclear whether the Florida Statutes gives the Florida Commission the authority to order RCC since the Commission may not have authority to allow carriers to recover their cost and loss revenue.

PROPOSAL FOR RATE CENTER CONSOLIDATION

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Big Pine Key Islamorada Key Largo Key West Marathon North Key Largo Sugarloaf Key	Keys	BellSouth	305	None	Dade
Homestead Miami North Dade Perrine	Dade	BellSouth	305-786	Broward	Keys, Palm Beach
Cocoa Cocoa Beach Eau Gallie Melbourne Titusville	Brevard	BellSouth	321	Indian River	None
Cedar Key	Cedar Key	BellSouth	352	None	Gainesville Chiefland
Hawthorne	Hawthorne	BellSouth	352	Gainesville Trenton Chiefland Williston (Sprint)	Cedar Key
Keystone Heights	Keystone Heights	BellSouth	352	Melrose (Alltel) Starke (Sprint) Florahome (Alltel - Clay Co.)	Gainesville Waldo (Alltel)

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Brooksville Weekiwachee Springs	Brooksville	BellSouth	352	None	Dade City (Sprint) San Antonio (Sprint) Trillacoochee (Sprint)
Bronson Chiefland	Chiefland	BellSouth	352	Gainesville Trenton Williston (Sprint)	Cedar Key Cross City
Cross City Old Town	Cross City	BellSouth	352	None	Chiefland Gainesville Trenton
Dunnellon Yankeetown	Dunellon	BellSouth	352	Bellview (Sprint) Crystal River (Sprint) Forest (Sprint) Ocala (Sprint) Oklawaha (Sprint) Salt Springs (Sprint) Silver Springs Shores (Sprint)	Beverly Hills (Sprint)
Archer Gainesville Micanopy	Gainesville	BellSouth	352	Alachua (Alltel) Brooker (Alltel) Chiefland Hawthorne High Springs (Alltel) Lake Bulter (Alltel) Melrose (Alltel) Trenton Waldo (Alltel)	Cedar Key Cross City Keystone Heights McIntosh (Alltel) Williston (Sprint)

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Newberry Trenton	Trenton	BellSouth	352	Alachua (Alltel) Chiefland Gainesville High Springs (Alltel) Trenton	Cross City
DeBary	DeBary	BellSouth	407-321	DeLand Orange City (Sprint) Sanford	Orlando Winter Park (Sprint)
East Orange Orlando	Orlando	BellSouth	407-321	Celebration (Vista United) Clermont (Sprint) Groveland (Sprint) Lake Buena Vista (Vista United) Monteverde (Sprint) Orange (Sprint) Sanford Winter Park (Sprint)	DeBary Osceola (Sprint)
Geneva Oviedo Sanford	Sanford	BellSouth	407-321	DeBary Orlando Winter Park (Sprint)	Orange City (Sprint)
Belle Glade Pahokee	Belle Glade	BellSouth	561	None	Palm Beach
Sebastian Vero Beach	Indian River	BellSouth	561	Melbourne	Fort Pierce
Hobe Sound Stuart	Martin	BellSouth	561	Indiantown (Indiantown) Palm Beach St. Lucie	None

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Boca Raton Boynton Beach Delray Beach Jupiter West Palm Beach	Palm Beach	BellSouth	561	Broward Martin	Belle Glade Dade
Fort Pierce Jensen Beach Port St. Lucie	St. Lucie	BellSouth	561	Martin	Palm Beach Indian River
Century	Century	BellSouth	850	Brewton (BellSouth - AL) Flomaton(BellSouth - AL) Molino (Frontier) Pensacola Walnut Hill (Frontier)	None
Havana	Havana	BellSouth	850	Chattahoochee (St. Joseph) Greensboro (TDS) Gretna (TDS) Quincy (TDS) Tallahassee (Sprint)	None
Chipley Graceville Sunny Hills Vernon	Chipley	BellSouth	850	None	Bonifay (Sprint) Cottondale (Sprint) Grand Ridge (Sprint) Greenwood (Sprint) Malone (Sprint) Marianna (Sprint) Panama City Reynolds Hill (Sprint) Sneads (Sprint) Westville (Sprint)

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Gulf Breeze Holley-Navarre	Gulf Breeze	BellSouth	850	Fort Walton Beach (Sprint) Milton Pensacola	None
Jay Milton Munson Pace	Milton	BellSouth	850	Gulf Breeze Milton Pensacola	None
Lynn Haven Panama City Panama City Beach Youngstown-Fountain	Panama City	BellSouth	850	Tyndall AFB (St. Joseph) Wewahitchka (St. Joseph)	Chipley St. Lucie (St. Joseph) The Beaches (St. Joseph)
Cantonment Pensacola	Pensacola	BellSouth	850	Century Gulf Breeze Milton Molino (Frontier) Walnut Hill (Frontier)	None
Daytona Beach	Daytona Beach	BellSouth	904	None	DeLand Flagler New Smyrna Pierson
Lake City	Lake City	BellSouth	904	Branford (Alltel) Fort White (Alltel) Wellborn (Alltel) White Springs (Alltel)	Florida Sheriff Boy Ranch(Alltel) High Springs (Alltel) Lake Butler (Alltel) Live Oak (Alltel) Luraville (Alltel) MacClenny (Northeast) Sanderson (Northeast)
Pierson	Pierson	BellSouth	904	Crescent City (Alltel) DeLand	Daytona Beach Flagler

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
					New Smyrna
DeLand DeLeon Springs (NC)	DeLand	BellSouth	904	DeBary Orange City (Sprint) Pierson	Daytona Beach New Smyrna
Fernandina Beach Yulee	Fernandina Beach	BellSouth	904	Jacksonville	None
Bunnell Flagler Beach Palm Coast	Flagler	BellSouth	904	Flagler	Daytona Beach, Pierson
Baldwin Jacksonville Jacksonville Beach Julington Maxville Ponte Vedra Beach	Jacksonville	BellSouth	904	Callahan (Alltel) Orange Park St. Augustine Fernandina Beach	Hilliard (Alltel) MacClenney (Northeast) Palatka Sanderson (Northeast)
New Smyrna Beach Oak Hill (NC)	New Smyrna	BellSouth	904	None	Daytona Beach DeLand Pierson
Green Cove Springs Middleburg Orange Park	Orange Park	BellSouth	904	Jacksonville	Palatka St. Augustine
Palatka Pomona Park Welaka	Palatka	BellSouth	904	Crescent City (Alltel) Florahome (Alltel) Hastings (Alltel) Interlachen (Alltel)	Orange Park Jacksonville St. Augustine
St. Augustine St. Johns	St. Augustine	BellSouth	904	Hastings (Alltel) Jacksonville Orange Park	Palatka

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
Coral Springs Deerfield Beach Fort Lauderdale Hollywood Pompano Beach	Broward	BellSouth	954	Palm Beach Dade	None
Bartow Mulberry	Bartow	Verizon	863	Fort Meade (Sprint) Frostproof Haines City Lakeland	Plant City Tampa Central Tampa East Tampa North Tampa West
Frostproof Indian Lake Lake Wales	Frostproof	Verizon	863	Bartow Haines City	None
Haines City Haines City-Poinciana Winter Haven	Haines City	Verizon	863	Bartow Frostproof Lakeland Mulberry Osceola (Sprint)	Celebration (Vista United) Lake Buena Vista (Vista United) Orlando (BellSouth) Orange (Sprint)
Lakeland Polk City	Lakeland	Verizon	863	Bartow Fort Meade (Sprint) Haines City Plant City	None
Plant City	Plant City	Verizon	813	Lakeland Tampa Central Tampa East Tampa North Tampa West	Bartow
Tampa Central	Tampa Central	Verizon	813	Plant City Tampa East	Bartow Clearwater

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
				Tampa North Tampa West	Dade City (Sprint) San Antonio (Sprint) St. Petersburg
Tampa East Tampa South	Tampa East	Verizon	813	Palmetto Plant City Tampa Central Tampa North Tampa West	Bartow Clearwater St. Petersburg
Tampa North Zephyrhills	Tampa North	Verizon	813	Dade City (Sprint) Plant City San Antonion (Sprint) Tampa Central Tampa East Tampa West Trillacoochee (Sprint)	Bartow Clearwater Hudson St. Petersburg
Tampa West	Tampa West	Verizon	813	Clearwater Plant City Tampa Central Tampa East Tampa North	Bartow Hudson St. Petersburg
Hudson New Port Richey	Hudson	Verizon	727	Clearwater	Brooksville (BellSouth) Tampa North Tampa West
Clearwater Tarpon Springs	Clearwater	Verizon	727	Hudson St. Petersburg Tampa West	Tampa Central Tampa East Tampa North
St. Petersburg	St. Petersburg	Verizon	727	Clearwater	Tampa Central Tampa East Tampa North

Note: Calling scopes are based on New Exchange Name

OLD EXCHANGE	NEW EXCHANGE	COMPANY	AREA CODE	NEW LOCAL * (EAS, ETC.)	NEW * ECS
					Tampa West
Palmetto	Palmetto	Verizon	941	Bradenton Tampa East	Sarasota
Bradenton Myakka	Bradenton	Verizon	941	Palmetto Sarasota	None
Sarasota	Sarasota	Verizon	941	Bradenton Englewood	Palmetto
Englewood North Port Venice	Englewood	Verizon	941	Cape Haze (Sprint) Port Charlotte (Sprint) Sarasota	Boca Grande (Sprint)
West Kissimmee Kissimmee Kenansville St. Cloud	Osceola	Sprint	407	Celebration (Vista United) Haines City (Verizon) Orange	Lake Buena Vista (Vista United) Orlando (BellSouth) Winter Park
Windermere Winter Garden Reedy Creek Apopka	Orange	Sprint	407	Celebration (Vista United) Clermont Groveland Lake Buena Vista (Vista United) Montverde Orlando (BellSouth) Osceola Winter Park	Haines City (Verizon) Mount Dora

Note: Calling scopes are based on New Exchange Name

305/786 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Big Pine Key	Keys	2	5	7
Islamorada	Keys	2	5	7
Key Largo	Keys	4	5	9
Key West	Keys	5	7	12
Marathon	Keys	2	6	8
North Key Largo	Keys	1	5	6
Sugarload Key	Keys	2	4	6
Total	Dade	18	37	55
North Dade	Dade	52	37	89
Miami	Dade	296	111	407
Perrine	Dade	17	21	38
Homestead	Dade	10	13	23
Total	Dade	375	182	557
305/786 Total		393	219	612

305/786

Exchange	New Exchange	ILEC	ALEC	Total
Big Pine Key	Keys	2 1.25	5 1.25	2.5
Islamorada	Keys	2 1.25	5 1.25	2.5
Key Largo	Keys	4 3.25	5 1.25	4.5
Key West	Keys	5 4.25	7 1.75	6
Marathon	Keys	2 1.25	6 1.5	2.75
North Key Largo	Keys	1 .25	5 1.25	1.5
Sugarload Key	Keys	2 1.25	4 1	2.25
Total	Keys	12.75	9.25	22
North Dade	Dade	52 51.25	37 16	67.25
Miami	Dade	296 295.25	111 81.75	377
Perrine	Dade	17 16.25	21 6	22.25
Homestead	Dade	10 9.25	13 4	13.25
Total	Dade	372	107.25	479.25
305/786 Total		384.75	116.50	501.25

407/321 NPA

Exchange	New Exchange	ILEC	ALEC	Total
East Orange	Orlando	1	7-7	8
Orlando	Orlando	113	62-32	175
Total	Orlando	114	69	183
Windermere	Orange	2	5-5	7
Winter Garden	Orange	4	11-11	15
Reedy Creek	Orange	4	7-7	11
Apopka	Orange	6	10-9	16
Total	Orange	16	33	49
Geneva	Sanford	1	4-4	5
Oviedo	Sanford	6	9-9	15
Sanford	Sanford	19	24-18	43
Total	Sanford	26	37	63
West Kissimmee	Osceola	6	11-11	17
Kissimmee	Osceola	15	14-13	29
Kenansville	Osceola	1	3-3	4
St. Cloud	Osceola	4	4-4	8
Total	Osceola	26	32	58
407/321 Total		182	171	353

407/321

Exchange	New Exchange	ILEC	ALEC	Total
East Orange	Orlando	1 .25	7-7 1.75	2
Orlando	Orlando	113 112.25	62-32 38	150.25
Total	Orlando	112.50	39.75	152.25
Windermere	Orange	2 1.25	5-5 1.25	2.50
Winter Garden	Orange	4 3.25	11-11 2.75	6
Reedy Creek	Orange	4 3.25	7-7 1.75	5
Apopka	Orange	6 5.25	10-9 3.25	8.50
Total	Orange	13	9	22
Geneva	Sanford	1 .25	4-4 1	1.25
Oviedo	Sanford	6 5.25	9-9 2.25	7.50
Sanford	Sanford	19 18.25	24-18 10.50	28.75
Total	Sanford	23.75	13.75	37.50
West Kissimmee	Osceola	6 5.25	11-11 2.75	8
Kissimmee	Osceola	15 14.25	14-13 4.25	18.50
Kenansville	Osceola	1 .25	3-3 .75	1
St. Cloud	Osceola	4 3.25	4-4 1	4.25
Total	Osceola	23	8.75	31.75
407/321 Total		172.25	71.25	243.50

561 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Belle Glade	Belle Glade	4	6	10
Pahokee	Belle Glade	1	4	5
Total	Belle Glade	5	10	15
Sebastian	Indian River	6	4	10
Vero Beach	Indian River	11	9	20
Total	Indian River	17	13	30
Hobe Sound	Martin	2	5	7
Stuart	Martin	9	6	15
Total	Martin	11	11	22
Boca Raton	Palm Beach	45	28	73
Boynton Beach	Palm Beach	17	11	28
Delray Beach	Palm Beach	20	11	31
Jupiter	Palm Beach	8	7	15
West Palm Beach	Palm Beach	94	28	122
Total	Palm Beach	184	85	269
Fort Pierce	St. Lucie	11	7	18
Jensen Beach	St. Lucie	4	5	9
Port St. Lucie	St. Lucie	13	7	20
Total	St. Lucie	28	19	47
561 Total		245	138	383

561

Exchange	New Exchange	ILEC	ALEC	Total
Belle Glade	Belle Glade	4 3.25	6 1.5	4.75
Pahokee	Belle Glade	1 .25	4 1	1.25
Total	Belle Glade	3.50	2.50	6
Sebastian	Indian River	6 5.25	4 1	6.25
Vero Beach	Indian River	11 10.25	9 3	13.25
Total	Indian River	15.50	4	19.50
Hobe Sound	Martin	2 1.25	5 1.25	2.50
Stuart	Martin	9 9.25	6 1.50	10.75
Total	Martin	10.50	2.75	13.25
Boca Raton	Palm Beach	45 44.25	28 13	57.25
Boynton Beach	Palm Beach	17 16.25	11 2.75	19
Delray Beach	Palm Beach	20 19.25	11 3.50	22.75
Jupiter	Palm Beach	8 7.25	7 2.50	9.75
West Palm Beach	Palm Beach	94 93.25	28 13	106.25
Total	Palm Beach	180.25	34.75	215
Fort Pierce	St. Lucie	11 10.25	7 1.75	12
Jensen Beach	St. Lucie	4 3.25	5 2	5.25
Port St. Lucie	St. Lucie	13 12.25	7 2.50	14.75
Total	St. Lucie	25.75	6.25	32
561 Total		235.50	50.25	285.75

727 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Hudson	New Port Richey	9	9-6	18
New Port Richey	New Port Richey	20	14-12	34
Total	New Port Richey	29	23	52
Clearwater	Clearwater	73	24-18	97
Tarpon Springs	Clearwater	8	12-10	20
Total	Clearwater	81	36	117
727 Total		110	59	169

727 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Hudson	New Port Richey	9 8.25	9-6 4.50	12.75
New Port Richey	New Port Richey	20 19.25	14-12 5	24.25
Total	New Port Richey	27.50	9.50	37
Clearwater	Clearwater	73 72.25	24-18 10.50	82.75
Tarpon Springs	Clearwater	8 7.25	12-10 4.50	11.75
Total	Clearwater	79.50	36	94.50
727 Total		107	45.50	152.50

813 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Tampa East	Tampa East/South	15	48-17*	
Tampa South	Tampa East/South	6		
Total	Tampa East/South	21		
Tampa North	Tampa North	12		
Zephyrhills	Tampa North	6	9-8	
Total	Tampa North	18		
813 Total		39		

* ALEC information not identified by exchanges

813 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Tampa East	Tampa East/South	15 14.25	48-17*	
Tampa South	Tampa East/South	6 5.25		
Total	Tampa East/South	19.50		
Tampa North	Tampa North	12 11.25		
Zephyrhills	Tampa North	6 5.25	9-8	
Total	Tampa North	16.50		
813 Total		36		

904 NPA

Exchange	New Exchange	ILEC	ALEC	Total
DeLand	DeLand	6	3	9
DeLeon Springs	DeLand	1	0	1
Total	DeLand	7	3	10
Fernandina Beach	Fernandina Beach	4	6	10
Yulee	Fernandina Beach	2	2	4
Total	Fernandina Beach	6	8	14
Bunnell	Flagler	2	0	2
Flagler Beach	Flagler	2	0	2
Palm Coast	Flagler	3	1	4
Total	Flagler	7	1	8
Baldwin	Jacksonville	1	1	2
Jacksonville	Jacksonville	137	34	171
Jacksonville Beach	Jacksonville	6	10	16
Julington	Jacksonville	2	3	5
Maxville	Jacksonville	1	0	1
Ponte Vedra Beach	Jacksonville	4	6	10
Total	Jacksonville	151	54	205
New Smyrna Beach	New Smyrna	7	3	10
Oak Hill	New Smyrna	1	0	1
Total		8	3	11
Green Cove Springs	Orange Park	2	2	4
Middleburg	Orange Park	2	1	3
Orange Park	Orange Park	9	10	19
Total	Orange Park	13	13	26
Palatka	Palatka	5	1	6
Pomona Park	Palatka	1	0	1
Welaka	Palatka	1	1	2
Total	Palatka	7	2	9
St. Augustine	St. Augustine	14	7	21
St. Johns	St. Augustine	2	0	2
Total	St. Augustine	16	7	23
904 Total		215	91	306

904 NPA

Exchange	New Exchange	ILEC	ALEC	Total
DeLand	DeLand	6 5.25	3 .75	6
DeLeon Springs	DeLand	1 .25	0 0	.25
Total	DeLand	5.50	.75	6.25
Fernandina Beach	Fernandina Beach	4 3.25	6 1.50	4.75
Yulee	Fernandina Beach	2 1.25	2 .50	1.75
Total	Fernandina Beach	4.50	2	6.50
Bunnell	Flagler	2 1.25	0 0	1.25
Flagler Beach	Flagler	2 1.25	0 0	1.25
Palm Coast	Flagler	3 2.25	1 .25	2.50
Total	Flagler	4.75	.25	5
Baldwin	Jacksonville	1 .25	1 .25	.50
Jacksonville	Jacksonville	137 136.25	34 19.75	156
Jacksonville Beach	Jacksonville	6 5.25	10 2.50	7.75
Julington	Jacksonville	2 1.25	3 .75	2
Maxville	Jacksonville	1 .25	0 0	.25
Ponte Vedra Beach	Jacksonville	4 3.25	6 1.50	4.75
Total	Jacksonville	146.50	24.75	171.25
New Smyrna Beach	New Smyrna	7 6.25	3 .75	7
Oak Hill	New Smyrna	1 .25	0 0	.25
Total		6.50	.75	7.25
Green Cove Springs	Orange Park	2 1.25	2 .50	1.75
Middleburg	Orange Park	2 1.25	1 .25	1.50
Orange Park	Orange Park	9 8.25	10 2.50	10.75
Total	Orange Park	10.75	3.25	14
Palatka	Palatka	5 4.25	1 25	4.50
Pomona Park	Palatka	1 .25	0 0	.25
Welaka	Palatka	1 .25	1 .25	.50
Total	Palatka	4.75	.50	5.25
St. Augustine	St. Augustine	14 13.25	7 1.75	15
St. Johns	St. Augustine	2 1.25	0 0	1.25
Total	St. Augustine	14.50	1.75	16.25
904 Total		197.75	34	231.75

954 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Coral Springs	Broward	13	14	27
Deerfield Beach	Broward	19	20	39
Pompano Beach	Broward	36	27	63
Ft. Lauderdale	Broward	143	50	193
Hollywood	Broward	45	25	70
954 Total		256	136	392

954 NPA

Exchange	New Exchange	ILEC	ALEC	Total
Coral Springs	Broward	13 12.25	14 5	17.25
Deerfield Beach	Broward	19 18.25	20 6.5	24.75
Pompano Beach	Broward	36 35.25	27 12	47.25
Ft. Lauderdale	Broward	143 143.25	50 28.50	171.75
Hollywood	Broward	45 44.25	25 11.50	55.75
954 Total		253.25	63.50	316.75

WORKING GROUP MEMBERS
Alltel Communications, Inc.
AT&T
BellSouth Telecommunications, Inc.
BellSouth Cellular Corporation
Cox FL Telecommunications
Florida Public Service Commission
Intermedia
NeuStar
WorldCom, Inc.
MediaOne
Office of Public Counsel, c/o Florida Legislature
VoiceStream/Omnipoint
Peggy Arvanitas - Individual
PrimeCo
Sprint
Supra Telecom
Time Warner Telecom
Verizon
Verizon Wireless
Wireless One

Note: The level of participation in the work group varied for the individuals and companies listed above. The individuals and companies listed were identified as working group members.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc.'s Comments in Docket 010963-TP has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 10th day of May, 2002.

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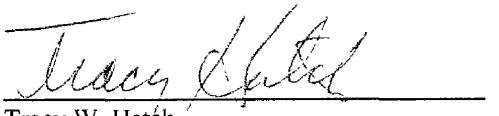

Tracy W. Hatch