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Peggy Arvanitas

April 5, 2000

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Ms. Blanca Bayo, Director
Disn of Records and Reporting
Rm 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket 981444-TP

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Dear Ms. Bayo,

Enclosed is an original and 10 copies of Peggy Arvanitas' comments in regards to staff and Industry comments in the above referenced docket.

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

Thank you for your assistance with this filing.

Sincerely,

Peggy Arvanitas

Peggy Arvanitas
(representing herself)

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Peggy Arvanitas

April 5, 2000

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Tallahassee, Florida 32399-0850

Re: Docket 981444-TP

Dear Ms. Bayo,

I am responding to the March 23, 2000 comments of the informal Florida NXX Code Holders Group ("FCHG") and am submitting this letter to the Public Service Commission of Florida, in regards to PSC order No. 00-0543-PAA-TP. Hopefully this will clarify certain issues, clear up some misunderstanding, and shed some light on our Number Pooling Subcommittee conference calls as well as the Short Term Number Conservation subcommittee. The points I will highlight are:

- 1) Number pooling Conference Call Conversations/Format/ Impressions
- 2) Short Term Conservation mtg- Utilization thresholds
- 3) Porting/ Pooling- equipment understanding for Cost Allocation
- 4) Voluntary Stipulation docket 990373tp-out of order- Rulemaking

I am a realtor who lives in Tampa Bay area. This is the 21st ranked MSA in the USA. I am not excluded to just the Tampa Bay area, though. I frequently fly into Ft. Lauderdale and drive down to South Beach- Miami, as some customers feel loyalty to me. My licence as a Realtor gives me the ability to sell real estate anywhere in the state. I have clients who are also elderly and have rental property here in Tampa Bay area that occassionally comes up for sale. Any split or overlay causes me and my customers hardship and subsequently lost business. And the definition of number pooling and rules pertaining to it will, in the future affect the Tampa Bay area. Thus my involvement and concern in this docket and forthcoming remarks.

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NUMBER POOLING CONFERENCE CALL/ IMPRESSIONS

Mr. Floyd Self was very incorrect when he said the PSC staff out of the blue sprung this surprise recommendation of area codes for number pooling. As a matter of fact, AT&T Floyd Self was noticeably absent until the final conference call, as the written roll call will show. The first meeting on October 20, 1999, the tone was very subdued by the "Industry" and the staff members said the State of Florida was given jurisdiction over the numbering conservation measures. And that hopefully, the "Industry" will assist in some recommendations to facilitate the process. Then, we volunteered for the Subcommittees, of which Number Pooling was chaired by Levent Ileri.

Of course, immediately, the Industry members were in an argumentative discussion about cost recovery (discussed in detail later) and Charlie Beck, Office of Public Council re-iterated the FCC's order verbatim to The Florida PSC. We first discussed the submission of data requests for NXX codes. Later, we reviewed and discussed interpretation of data, and that some of the utilization thresholds were obviously incorrect (details later) for non jeopardy areas and almost 80% fill rates or utilization thresholds. When BellSouth argued with me about the criteria for a Number Pooling test area, the teleconference calls became loud, insulting, and ugly, especially towards me. I wanted Tampa Bay area. BellSouth actually picked their own areas, with Stan Greer leading the helm. Of course, the really ugly comments came when I had quoted verbatim FCC 95-116 3rd (1998) and fourth (1999) order dealing with number PORTABILITY.

- 1) All top 100 MSA's must be LRN-LNP capable (portability) by December 30, 1998.
- 2) The Industry cannot charge for portability, either end user (customer phone bills) or query charges (other Industry members) until they are LNP capable the initial start date being Feb 1, 1999 by federal tariff to FCC.

The reason for the portability discussion is this. You must be LNP capable (heavy provisioning on the switches) so that you can port, and if you can't PORT YOU SURE AS GOD CAN'T DO NUMBER POOLING. Because Stan Greer and Doug McCullough of BellSouth kept arguing over the phone and made the following statements which I recorded

- 1) "You are incorrect, we do not have to be LNP capable until a CLEC makes a demand, and then we have 6 months to do it."
- 2) "Who are you, what phone company do you work for?"
- 3) and all this arguing started when Stan Greer, BellSouth proclaimed, (to Levent Ileri) "Who have to tell us what area you are going to do Number Pooling in so we can make sure we are LNP capable."

So, I re-iterated they had better be LNP capable, because they've been charging in their areas since July 1999. Otherwise, they need to do a refund to the customers for violating an FCC order. At that point, BellSouth was quiet, and never discussed it further.

It is my impression, from the comments of BellSouth very adamantly in the Number Pooling conference calls that they are not 100% LNP capable in their top 100 MSA service areas, which include Jacksonville, Ft. Lauderdale, Miami, and Palm Beach County. Mr Stan Greer of BellSouth, being the most vocal, also said , " We have to be re-imbursed for OSS and SS7 upgrades to the switch." Of course, read for yourself, FCC 95-116 third order June 1998, #73-#75. These are portability provisioning costs THEY ARE ALREADY BEING REIMBURSED FOR. And this might be the reason this biggest ILEC in the state of Florida wants to delay Number Pooling with legal measures so they have time to do the provisioning.

UTILIZATION THRESHHOLDS

Short term number conservation committee included the discussion of the utilization threshholds, or as they are called, "fill rates" for verification purposes. Actually, Bellcore , when they were NANPA administrator, had fill rates as a measurement to review and issue NXX codes. Then, We had this amazing "formula" called MTE, or month's to exhaust. It is a projection of need, and does not deal with actual usage. And, after 1993, the whole USA saw and felt a rapid acceleration of NXX's being assigned, and area codes exhausting.

Of course, BellSouth objects to this also, but I have an understanding because of a brother who works in the cable industry. 30 year old technology copper wiring and 15 year old "fixed" AESS and 5ESS Lucent switches will not be able to handle as a high of a fill rate, or number assignment on their 10,000 numbered NXX's wired. Cable fiber optic lines can, and cable companies also have newer "variable" switches. Maybe BellSouth should be upgrading their wiring and switches. As I said in 990373TP PSC docket May 1999. "We don't have a number inefficiency, we have equipment inefficiency."

PORTING/POOLING/ COST ALLOCATION

To understand my concern about appropriate and not inflated cost allocations for equipment, I want to rewind everyone to February 1999 Public Service Commission of Florida report to the legislature. At that point I became concerned that some legal attorneys from the PSC, Commissioners, and attorneys for the Industry lacked an understanding about equipment. For POTS (plain old phone service) three ILEC's BellSouth, GTE and Sprint were allowed to allocate all the costs of wiring and switches to a low revenue yeild basic phone service. GTE, being the worst, said they were 40% under cost. Of course, vertical services, like call waiting, call forwarding, voice mail box had NO COST ALLOCATION WHATSOEVER. GTE told the PSC their revenue for

services was none of the PSC of Florida's business (proprietary), even though 50% of GTE's customers have additional, or vertical services. The PSC should have realized that call waiting does not jump into your phone. It might need the help of some wires and switches, thereby justifying that ILEC's are not in the hole. Please do not make the same mistake with number pooling.

There are certain costs reimbursed to the Industry that they are already charging for: portability. When asked by me in the last teleconference call, Stan Greer of BellSouth could not give me one additional cost, or give a breakdown to Levent Ileri, PSC staff member, when asked. I asked Stan Greer, "When are you going to know what your costs are? You have been in this docket for 5 months, when are you going to figure it out?"

VOLUNTARY STIPULATION AGREEMENT NEVER WENT TO RULEMAKING

Please review 990373TP docket. Most of the Commissioners were very dissatisfied in the vagueness of "9 months of inventory clause" which you have no way of knowing what the Industry's inventory is, because it's according to something just as vague as the MTE schedule. Immediately, the attorneys said it was proprietary. So, like I said then, 20 years of numbers could be wrapped around their gut, and you couldn't lug wrench them off.

If the Industry is challenging the Commission's order, they cannot pick and choose what they will or will not accept. IT'S ALL OR NOTHING. May I recommend to the Commission we go back into RULEMAKING like we were supposed to and define the voluntary stipulation.

The FCC, NANPA, and State PSC's have all said, "THESE ARE THE PUBLIC'S NUMBERS." Then why are the citizens being punished for poor service and inefficiency? Numbers get ported and this is a cost to the Industry. People and businesses LEAVE ILEC's because the rates are too high and the service is too poor. WHY IS THE PUBLIC REIMBURSING THE INDUSTRY FOR THIS? Numbers have to be pooled to be redistributed when they are allocated out of sequence (remember consecutive numeration). WHY ARE THE CITIZENS having to pay for this inefficiency?

Once again, I am praying for the state of Florida citizens.


Peggy Arvanitas

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 U.S. mail on this 5th day of April, 2000

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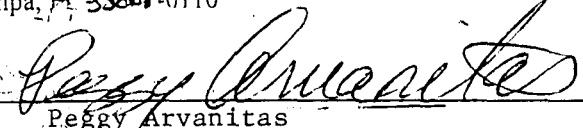
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