

April 12, 2000 ORIGINAL

Peggy Arvanitas
%RE/MAX 1st Class
620 Bypass Dr
Clearwater, Fla. 33764
(727)-742-1386 home phone

BY AIRBORNE DELIVERY

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

RE: Docket 981444TP

00 APR 13 AM 11:56
MAIL ROOM

Dear Ms. Baño,

Enclosed are an original and ten copies of a PROTEST to Industry's Number Pooling Order in the above referenced docket.

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

Thank-you for your assistance in this filing.

Sincerely,

Peggy Arvanitas
Peggy Arvanitas

(representing myself)

- AFA _____
- APP _____
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Peggy Arvanitas
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

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

Docket No. 981444TP
Filed April 13, 2000

NUMBER POOLING -The Battle of the Bulge in Florida

I am aware my filing was reviewed as "COMMENTS" and not a "PROTEST" to the Industry's challenge to the PSC of Florida 00-0543-PAA-TP. These are the statements made at the April 6, 2000 filing on record . This is a clarification, so there will be no misunderstanding. I AM PROTESTING AND CHALLENGING THE INDUSTRY'S PROTEST TO NUMBER POOLING.

For the record,

- 1) I am PROTESTING BellSouth's and the Industry's contention that they were "blindsided" by the PSC of Florida's staff recommendation for number pooling areas. I personally wanted the Tampa Bay area, and BellSouth representative fought me and personally recommended his company's areas. (GTE is in Tampa Bay)
- 2) I am PROTESTING the Industry's arguement to exclude utilization thresholds as a measurement of verification of usage, to impede the massive exodus of area code proliferation. Months to Exhaust, commonly called MTE worksheets given to NANPA "certify" not "verify" numbers on switches are utilized. Utilization thresholds are a more exact measurement of usage.
- 3) I am PROTESTING the section of the Voluntary Stipulation dealing with "9 month's of inventory" of numbers Industry is allowed to keep and not release for number pooling. The Industry uses MTE criteria for this, and once again, there is no verification for the State of Florida that this won't allow the fair and equitable re-distribution of "unused" numbers. Or that "dirty" word we are avoiding ,"SHARING."
- 4) I am PROTESTING (March 23, 2000 Floyd Self's filing) "Exhibit A" no.10 which says to exclude any revision of INC Number Pooling guidelines. Industry knows that PSC's nationwide have agreed UNANIMOUSLY on specific modifications to INC's Number Pooling Guidelines. Earlier this year, Trina PSC staff member from Maine, and Greg Pantenaude, PSC staff member from NY were EXCLUDED when INC members Changed a call in number for a final NANC meeting vote on changes to INC Number Pooling Guidelines.

(cont.)

The eloquent Industry approved their own Guidelines without State PSC's revisions, and the Number Pooling Administrator, at last review, was refusing to insert State revisions in contracts with the individual states. The most noticable change is, you guessed it, utilization thresholds as a control review by states before NANPA releases any new 1000's to the Industry members.

- 5) I am PROTESTING the statement that, 1.4 number pooling software that has been in use in Illinois since last year "is inefficient" and should not be used in 954 and 561 area codes. The only measure that makes it "inferior" is, 1.4 requires each individual number to be ported out "manually" so that these numbers can go to pooling administrator to be pooled. This is LABOR INTENSIVE, and we all know about the Industry's union negotiations and poor wages for men and women in the field and at the workplace doing the work. 3.0 software will have an at least 50% savings in labor costs. Are they going to pass their costs on to the PUBLIC? And what are the Public's costs going to be if we delay number conservation number pooling for these areas? Did anyone forget, "These are the Public's Numbers!"
- 6) I am PROTESTING the statement that number pooling proposed by the Commission "fails to provide for the recovery of costs expended" by the Industry. The Industry-BellSouth most notably being represented by Teleconference call statements (alias Stan Greer) can not tell the PSC staff member or the "Concerned and Irate" citizen what the full costs are. And Stan Greer stated some costs that should be included ^{were} in that "portability" charge in phone bills IF THEY IN FACT WERE 100% LNP CAPABLE IN THEIR top 100 MSA areas as per FCC 95-116 3rd order (June 1998) (By the way, I thank Charlie Beck, Office of Public Council for making all the FCC filings available to me.) Like I said before, if you aren't LNP capable, you can't do permanent porting , let alone NUMBER POOLING. Is this why we must wait on Bellsouth? Is there a refund to Bellsouth customers in order that you are n't telling us? I believe BellSouth's FCC tariff file date was July 1999.
- 7) I am PROTESTING the statement by the Industry that "the PAA Plan for Number Pooling would impair the Joint Petitioner's access to numbering resources." This is their opinion , just as it is some Consumer's opinion that the Industry is stockpiling numbers. And, of course, it is the Office Of Public Council's opinion that BellSouth and GTE have "impaired customer service", or so I would form such an opinion with the numerous OPC service hearings held around the state. There is no LAW, PSC's, or FCC's , or NANPA's that would suggest unlimited and unbridled access to numbers. The Industry's ability for WILD WEST competition should not overwhelm customers with CHAOS of new area codes or overlays. The Public should not be overwhelmed with CHAOS to COMMUNICATE.

I am further BEGGING the Public Service Commission of Florida to cease and desist with a State order, ^{to} NANPA to further release ANY NXX's in the whole state of Florida until such time the Number Pooling conservation issues can be ironed out with the Industry. It's time the PSC balanced Industry concern for costs with the CONSUMER COSTS. I also would like to see the Voluntary Stipulation to go into rulemaking, as per the PSC order docket 990373Tp May 1999.

Sincerely,


Peggy Arvanitas

(Citizen of Florida, representing myself)

certificate of service Attached

• Representative Sharon Merchant*
Florida House of Representatives
Room 316, House Office Building
402 South Monroe
Tallahassee, FL 32399

• Mr. Patrick "Booter" Imhoff*
House Utilities and Telecommunications Committee
428 House Office Building
Tallahassee, FL 32399

• Charles J. Rehwinkel
Susan Masterton
F. Ben Poag
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

• Ms. Peggy Arvanitas
c/o RE/MAX First Class, Inc/
620 Bypass Drive
Clearwater, FL 33764

Mr. Fredrick Cderqvist
AT&T
Room 2A114
900 Routes 202/206 N
Bedminster, NJ 07921

• Marsha Rule, Esq.
Tracy Hatch, Esq.
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

• BellSouth Mobility, Inc.
1100 Peachtree St., NE #910
Atlanta, GA 30309-4599

• Cellular One of Southwest Florida
2100 Electronics Lane
Ft. Myers, FL 33912-1605

• Global NAPS, Inc.
10 Merrymount Road
Quincy, FL 02160

GTE Wireless Incorporated
245 Perimeter Center Parkway
Atlanta, GA 30346

Richard Melson, Esq.
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

ITC^DeltaCom
Regulatory Affairs Manager
700 Boulevard South, Suite 101
Huntsville, AL 35802

• Mr. Don Price
MCI Telecommunications
701 Brzos, #600
Austin, TX 78701

• Donna Canzano McNulty, Esq.
MCI WorldCom, Inc.
The Atrium, Suite 105
325 John Knox Road
Tallahassee, FL 32303

• Charles Beck, Esq.
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32399-1400

• Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

• Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 330099

• Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Incorporated
MC FLTLHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Ms. Robin Norton
Technologies Management
P.O. Drawer 200
Winter Park, FL 32790-0200

Mr. David Christian
GTE Florida, Incorporated
106 E. College Avenue, Suite 810
Tallahassee, FL 32301

• Michael A. Gross
Vice President, Regulatory Affairs
and Regulatory Counsel
Florida Cable Telecommunications Association
310 N. Monroe St.
Tallahassee, FL 32310

Floyd Selby / AT & T
215 S. Monroe St # 701
PO Box 1876
Tallahassee, FL 32302

• ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060-3357

• Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Gloria Johnson
Associate General Counsel
BellSouth Cellular Corp.
1100 Peachtree Street, N.E., Suite 910
Atlanta, GA 30309-4599

• Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL ~~33601~~-0110


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 13th day of April, 2000

- Cathy Bedell, Esq.*
Acting General Counsel
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. Walter D'Haeseleer*
Director of Telecommunications
Division of Legal Services, Room 270
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Beth Keating, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Diana Caldwell, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. John Cutting*
Division of Telecommunications, Room 270
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. Levant Ileri*
Division of Telecommunications, Room 270
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Ms. Sally Simmons*
Division of Telecommunications, Room 270
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. Jorge Cruz-Bustillo*
Aide to Chairman Garcia
Commissioner's Suite, Room G-335
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. William Berg*
Aide to Commissioner Deason
Commissioner's Suite, Room G-335
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Mr. Wilbur Stiles*
Aide to Commissioner Clark
Commissioner's Suite, Room G-335
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Ms. JoAnn Chase*
Aide to Commissioner Jaber
Commissioner's Suite, Room G-335
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Ms. Melinda Butler*
Aide to Commissioner Jacobs
Commissioner's Suite, Room G-335
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
- Senator Ron Klein*
Florida Senate
Room 220, Senate Office Building
404 South Monroe St.
Tallahassee, FL 32399
- Senator Howard Forman*
Florida Senate
Room 208, Senate Office Building
404 South Monroe St.
Tallahassee, FL 32399