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ORIGINAL

July 7, 2000

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RECORDS AND REPORTING

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 for Reconsideration 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 (PW)

Enclosures

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

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**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 7th day July, 2000 to the following:

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 981444-TP

Filed: July 7, 2000

**RESPONSE OF BELL SOUTH TELECOMMUNICATIONS, INC. TO THE
MOTION FOR RECONSIDERATION OF MS. ARVANITAS**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to Peggy Arvanitas' Motion for Reconsideration of Order No. PSC-00-1046-PAA-TP ("Motion") filed with the Florida Public Service Commission ("Commission") on June 19, 2000. For the reasons stated below, this Motion should be dismissed and otherwise not deemed a petition for a hearing on the proposed agency action ("PAA") provisions of Order No. PSC-00-1046-PAA-TP.

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. No code holder, carrier, or other interested party has filed a formal protest of this Order. Accordingly, it should be deemed final agency action with respect to the Proposed Agency Action ("PAA") matters, specifically the number pooling plans for the 954, 561, and 904 NPAs discussed therein.

2. On June 19, 2000, Ms. Arvanitas filed her Motion for Reconsideration of Order No. PSC-00-1046-PAA-TP. This document was not served on BellSouth. BellSouth received a copy of this document from the Commission on June 30, 2000. Accordingly, this response is timely filed.

3. As AT&T and WorldCom point out in their July 3, 2000 response to Ms. Arvanitas' Motion, to the extent Ms. Arvanitas seeks reconsideration of any of the PAA provisions of the Order, her Motion must be denied. Florida Administrative Code Rule 25-22.060(1)(a) specifically states that the Commission will not entertain a motion for reconsideration of a PAA order. Thus, the Commission should dismiss this Motion.

4. If Ms. Arvanitas' intent in filing the Motion was to seek reconsideration of a final action of the Commission under the Order, such as the dismissal of her challenge to Order No. PSC-00-0543-PAA-TP, a request for reconsideration of that decision may be procedurally appropriate, provided she can demonstrate that she has standing to raise such issues and other procedural requirements are met. As AT&T and WorldCom have stated, however, such a Motion would not affect the proposed agency actions in the Order, such as the adoption of the number pooling plan. Accordingly, the Motion should not be considered any barrier or impediment to the adoption or implementation of the number pooling plan approved by the Order.

5. If Ms. Arvanitas intends that her Motion be construed as a protest of the number pooling plan adopted by the Order, it should be denied, as it fails to fulfill the legal requirements for a protest. See 28-106.201, Florida Administrative Code.

6. Like AT&T and WorldCom, BellSouth has specific substantive objections to the matters identified in Ms. Arvanitas' Motion including those identified by AT&T and WorldCom in their response to the Motion. In addition, the Motion is replete with factual inaccuracies and misunderstandings of rulings of this Commission and of the FCC. BellSouth reserves the right to address the merits of Ms. Arvanitas' issues at a later

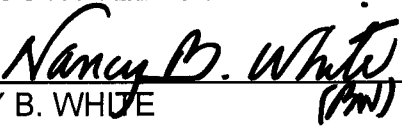
time if the Commission should decide that she is entitled to a hearing on the merits of her Motion.

7. As AT&T and WorldCom noted, Ms. Arvanitas, through her Motion and her communications with the industry, NeuStar and the North American Portability Management LLC, has threatened the timely implementation of the Commission's Order with regard to number pooling in the 954, 561, and 904 NPAs. Accordingly, BellSouth urges the Commission to address this Motion as quickly as possible to resolve any potential delay it may cause.


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

Respectfully submitted this 7th day of July, 2000.

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