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**ORIGINAL**

September 28, 2000

RECEIVED-PPSC  
00 SEP 28 PM 3:21  
RECORDS AND REPORTING

**BY HAND DELIVERY**

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

Re: FPSC Docket 981444-TP

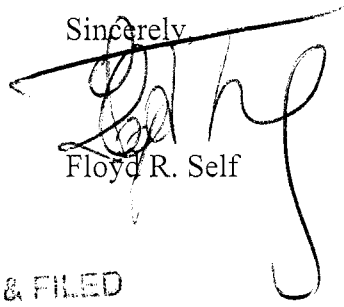
Dear Ms. Bayó:

Enclosed for filing is an original and 15 copies of a letter from the Florida carriers to the Co-Chairs of the North American Portability Management, LLC regarding Florida Number Pooling Cost Allocation 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,



Floyd R. Self

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP 5
- COM \_\_\_\_\_
- DTR \_\_\_\_\_
- ECR \_\_\_\_\_ ERS/amb
- LEG 1 Enclosure
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

cc: Parties of Record

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12346 SEP 28 00

FPSC-RECORDS/REPORTING

## 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 Hand Delivery (\*) and/or U. S. Mail this 28th day of September, 2000.

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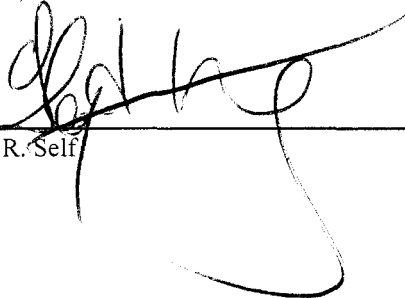
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September 27, 2000

VIA E-MAIL, FAX, AND FIRST CLASS MAIL

Ms. Pamela H. Connell, Co-Chair  
North American Portability Management, LLC  
c/o AT&T  
1200 Peachtree Street  
15E54  
Atlanta, GA 30309

and

Ms. Joanne Balen, Co-Chair  
North American Portability Management, LLC  
c/o SBC Communications, Inc.  
2600 Camino Ramon  
Room 2E403  
San Ramon, California 94583

RE: Florida Number Pooling Cost Allocation

Dear Ms. Connell and Ms. Balen:

Thank you for the email message of July 14, 2000, from Ms. Connell regarding the decision of the NAPM LLC to enter into negotiations with NeuStar to serve as the Interim Pooling Administrator for Florida to implement number pooling in the 954 NPA, in the Palm Beach MSA of the 561 NPA, and the Jacksonville MSA of the 904 NPA pursuant to Order No. PSC-00-1046-PAA-TP, issued May 30, 2000, by the Florida Public Service Commission ("FPSC"). In your email, it was indicated that the NAPM would not determine the appropriate interim cost allocation methodology for the Interim Pooling Administrator. It was requested by the NAPM that the Florida service providers choose an interim cost allocation methodology. I have been asked by the Florida service providers to respond to this email on their behalf.

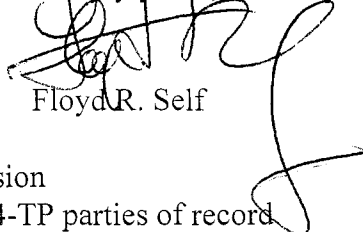
Since the receipt of this message, the Florida carriers have continued to work to resolve this issue by conference call and other meetings. At a conference call on September 27, 2000, the carriers agreed by a consensus vote that the appropriate cost allocation methodology to be included in the Interim Pooling Administrator contract shall be the modified version of the LNP method. With this approach, NeuStar would provide the FPSC with the South-east regional percentages used for LNP. The FPSC would then exclude all of the carriers that are not operating in Florida and reallocate the percentages among the Florida service providers. This result would be returned to NeuStar for the allocation of the shared or common pooling costs among all service providers in Florida. In taking this position, and in order to expedite the implementation of the pooling, the application fee and block fee shall be treated as carrier-specific costs. However, the carriers recognize that these costs should be treated as shared costs, but because of current billing limitations and other time constraints the service providers have agreed to accept these costs as carrier-specific on an interim basis.

In reaching this consensus decision, WorldCom respectfully opposed this approach. Instead, WorldCom advocated a cost allocation system whereby the costs would be allocated utilizing a percentage ratio method based on gross intrastate telecommunications end user revenues less payments to other carriers within the State of Florida. This approach was rejected by the consensus carriers out of concerns for the costs and timeliness of implementing such an approach.

As is specified in the FPSC's order approving the number pooling in the three NPA/MSAs identified above, the allocation of the Interim Pooling Administrator's costs shall be done on an interim basis until such time as the FCC determines a permanent Pooling Administrator and permanent cost allocation methodology. At that time, there shall be a retroactive true up of the interim cost allocation methodology to the permanent one adopted by the FCC.

With this decision, we believe the NAPM may now proceed to negotiate the interim pooling administrator contract with NeuStar. The NAPM's favorable consideration of this matter and its expeditious action consistent with this request and the terms of the FPSC's Order is greatly appreciated. If you have any questions, please contact me at 850-425-5213.

Sincerely yours,



Floyd R. Self

cc: Florida Public Service Commission  
Florida PSC Docket No. 981444-TP parties of record