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150 South Monroe Street  
Tallahassee, Florida 32301

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Stan L. Greer  
Manager - Regulatory Relations

October 31, 2000

RECORDS AND  
REPORTING

Cheryl Bulecza-Banks  
Bureau Chief  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: 1AESS Recommendation (Docket # [redacted])

Dear Ms. Bulecza-Banks:

As we discussed, I would like to briefly summarize my concerns with the staff recommendation referenced above.

First, on page 5, paragraph 3, staff indicates that key managers should have known based on a letter sent to BellSouth on February 12, 1999, that Lucent only would provide product support for the 1AESS switches until October 2003. BellSouth provided numerous letters in response to staff's additional request for information. I believe if you review all of the letters, you will agree that it was somewhat unclear as to the actual future support Lucent would provide.

Second, on page 5, paragraph 5, staff discusses the fact that SR1.4 or SR3.0 is currently available in every switch. It should be clear that the availability of SR1.4 and SR3.0 does not, by itself, make it possible for a 1AESS switch, or any switch, to handle pooling. SR1.4 and SR3.0 are software releases for the NPAC, not software upgrades for the individual switches.

Third, on page 5, paragraph 6, staff indicates that since Ameritech is pooling in the 1AESS switches using SR1.4, BellSouth should be able to do it as well. Since our discussion, BellSouth has been informed of the method used in Ameritech's 1AESS switches. It is my understanding that Ameritech is able to participate in pooling in the 1AESS switches not because of the availability of SR1.4, but because Neustar is managing the 1000 blocks in such a manner as to ensure no 1000 block is assigned to an Ameritech 1AESS switch where Ameritech is not the code holder. We are currently reviewing the circumstances with each BellSouth 1AESS to determine if such a solution is possible in the BellSouth 1AESS switches. It should be noted, the 1AESS switches have other limiting factors, such as capacity of NPA-NXX combinations, that may still make the Ameritech solution unworkable. BellSouth is studying to determine the impact of the Ameritech solution.

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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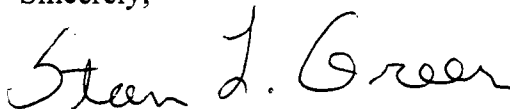
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FPSC-RECORDS/REPORTING

Cheryl Bulecza-Banks  
October 30, 2000  
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BellSouth remains committed to complying with the Commission's number pooling order and will implement pooling on time, throughout each affected MSA. BellSouth's waiver request is limited to the small minority of its switches, 1AESS switches, where BellSouth believes, due to lack of support from Lucent, pooling would not be possible. If after examining the arrangement used by Ameritech and Neustar to handle pooling in Ameritech's 1AESS switches, it appears that BellSouth would be able to successfully adopt the same solution, BellSouth would, of course, withdraw its request for a limited waiver of the pooling order. BellSouth would be grateful if the Commission would defer any action on its waiver request until it has determined whether such a work-around can be devised.

If you have any other questions, please call me at (850) 224-5139.

Sincerely,

A handwritten signature in cursive script that reads "Stan L. Greer".

Stan L. Greer  
Manager Regulatory Relations

cc: Blanco Bayo