

ORIGINAL



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RECORDS AND
REPORTING

November 13, 2000

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 990455-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Limited Protest of Proposed Agency Action Order. Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck

Charles J. Beck
Deputy Public Counsel

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CJB:bsr
Enclosures

Done 11/20/00

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of)	
Proposed numbering plan relief)	Docket no. 990455-TL
For the 305/786 area code - Dade)	
County and Monroe County/Keys)	Filed November 13, 2000
Region)	
_____)	

LIMITED PROTEST OF PROPOSED AGENCY ACTION ORDER

The Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, file this limited protest of Commission order no. PSC-00-1937-PAA-TL issued October 20, 2000.

1. Commission order no. PSC-00-1937-PAA-TL issued October 20, 2000, contains both a final order approving numbering plan relief for the 305/786, 954, and 904 area codes, and a proposed agency action order implementing rate center consolidation and code sharing in certain areas. Among other things, the proposed agency action order would require BellSouth to ballot customers in the Keys to determine if they would be willing to pay a rate additive to implement rate center consolidation.

2. On November 9, 2000, BellSouth and Citizens entered into a stipulation and agreement in docket 920260-TL. As part of that agreement, BellSouth agreed to

absorb the nonrecurring cost for the operational support system upgrades necessary to implement rate center consolidation and agreed to absorb the recurring cost of eliminating extended calling service as a result of consolidating the seven Florida Keys rate centers into one.

3. If the Commission accepts this settlement, there will no longer be any need to ballot customers in the Keys to determine if they would be willing to pay a rate additive to implement rate center consolidation. Since BellSouth will absorb the costs associated with rate center consolidation in the Keys, the agreement allows the Commission to implement rate center consolidation in the Keys without implementing a rate additive.

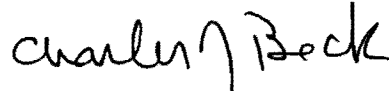
4. The Citizens therefore protest the proposed agency action order only to the extent it would require a ballot in the Keys on a rate additive. Instead, the Commission should approve the settlement agreement between Citizens and BellSouth, eliminate the portion of the proposed agency action order requiring a ballot in the Keys, and implement rate center consolidation in the Keys without any rate additive.

5. This protest does affect any other portion of the proposed agency action order.

WHEREFORE, the Citizens protest the proposed agency action order, request the Commission to approve the settlement agreement between Citizens and BellSouth, and request the Commission to implement rate center consolidation in the Keys without any rate additive, as contemplated by the settlement agreement.

Respectfully submitted,

JACK SHREVE
Public Counsel
Fla. Bar No. 73622



Charles J. Beck
Deputy Public Counsel
Fla. Bar No. 217281

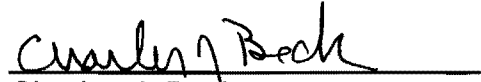
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Attorneys for Florida's Citizens

**DOCKET NO. 990455-TL
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand delivery to the following parties on this 13th day of November, 2000.


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