

ORIGINAL



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

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RECORDS AND
REPORTING

November 17, 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
Deputy Public Counsel

CJB:bsr
Enclosures

- APP _____
- CAF _____
- CMP *Alteri*
- COM 3
- CTR _____
- ECR _____
- LEG 1
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH None

Done 11/20/00

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DOCUMENT NUMBER-DATE
14906 NOV 17 8
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 17, 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-00-2055-PAA-TL issued October 27, 2000.

1. Among other things, Commission order no. PSC-00-2055-PAA-TL issued October 27, 2000, sets forth balloting procedures and time frames for rate center consolidation in the Keys.

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.

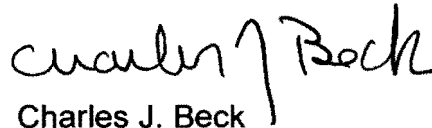
4. The Citizens therefore protest the proposed agency action order only to the extent it sets forth procedures and time frames for balloting in the Keys. Instead, the Commission should approve the settlement agreement between Citizens and BellSouth, eliminate the portion of the proposed agency action 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

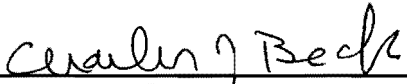
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

(850) 488-9330

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 17th day of November, 2000.


Charles J. Beck

Marsha Rule
AT&T Communications of
the Southern States, Inc.
101 North Monroe Street, Ste 700
Tallahassee, FL 32301

Nancy B. White
Michael Goggin
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Michael A. Gross
Florida Cable
Telecommunications Assoc., Inc.
246 E. 6th Avenue
Tallahassee, FL 32303

Angela Green, General Counsel
Florida Public
Telecommunications Assoc.
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Bruce May
Holland Law Firm
P.O. Drawer 810
Tallahassee, FL 32302-0810

Virginia Panico
Key West Chamber of Commerce
402 Wall St.
Key West, FL 33040

Ms. Donna C. McNulty
MCI WorldCom
The Atrium Bldg., Suite 105
325 John Knox Road
Tallahassee, FL 32303-4131

Mr. Brian Sulmonetti
MCI WorldCom, Inc.
Six Concourse Parkway, Ste. 3200
Atlanta, GA 30328

Floyd Self
Messer Law Firm
215 S. Monroe St., Suite 701
Tallahassee, 32301-1876

Monroe County Board of
Commissioners
500 Whitehead St.
Key West, FL 33040-6547

Kimberly D. Wheeler
Morrison & Foerster Law Firm
2000 Pennsylvania Avenue, NW
Washington, DC 20006-1888

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33090

Kenneth Hoffman
John Ellis
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302

Charles J. Rehwinkel
Sprint-Florida, Incorporated
P.O. Box 2214
MC FLTH00107
Tallahassee, FL 32315-2214

Tim Vaccaro
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Thomas C. Foley
NeuStar, Inc.
820 Riverbend Blvd.
Longwood, FL 32779

Representative Ken Sorenson
P.O. Box 699
Tavernier, FL 33070

Jon Assenzo
Sprint PCS
Legal Department
4900 Main Street, 11th Floor
Kansas City, MO 64112

Kimberly Caswell
Verizon Florida, Inc.
P.O. Box 110,
FLTC007
Tampa, FL 33601-0110