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January 23, 2001

VIA HAND DELIVERY

Mr. Walter D'Haeseleer
Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

010000-DU

Re: Emergency Request, Verizon's proposed updates to the Routing Data Base System ("RDBS") and Business Rating Input Database System ("BRIDS") affecting the Tampa rate center

Dear Mr. D'Haeseleer:

The purpose of this letter is to follow up on my letter of October 25, 2000, and your letter to Beverly Menard of November 17, 2000 regarding the proposed updates to the Routing Data Base System ("RDBS") and Business Rating Input Database System ("BRIDS") affecting the Tampa rate center that Verizon indicated in a August 15, 2000, letter would become effective on February 1, 2001. I have been asked to again write to you and seek your immediate assistance on behalf of various ALECs, including ALLTEL, AT&T, Intermedia, Sprint, Time-Warner, and WorldCom, as we have been advised by Telcordia that the proposed changes to the RDBS and BRIDS are going to be made effective February 1, 2001, contrary to your November 17, 2000, directive to Verizon.

As you will recall, in my October 25th letter to you I identified several concerns of the ALEC community regarding Verizon's proposed changes to RDBS and BRIDS. In your letter of November 17th, you requested that "Verizon delay any further updates to the RDBS and BRIDS indefinitely," and you recommended that "Verizon file the proposed updates to the Tampa RDBS and BRIDS with the Commission in the form of a petition which could be docketed." Your letter indicated that Verizon would defer this matter pending a Staff review of the proposed updates.

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FPSC-RECORDS/REPORTING

Mr. Walter D'Haeseleer
January 23, 2001
Page 2

On the basis of your letter, and other conversations, it was the ALEC community's understanding that Verizon would maintain the status quo pending such a petition to the Commission. Since your November 17th letter, many of the ALECs that are potentially affected by Verizon's proposed changes to RDBS and BRIDS have continued to meet in an attempt to identify and clarify issues associated with Verizon's proposed changes to these two systems. However, the ALECs had also decided that formal action on their part was unnecessary since the clear directive in your letter was that Verizon should initiate formal Commission action before proceeding with the updates. Such formal action by Verizon is appropriate since every ALEC and effectively every local customer, Verizon and ALEC alike, could be affected by the proposed changes. These changes include changes in local and toll calling scopes, changes in reciprocal compensation obligations, the need for some customers to receive new telephone numbers because of reassignment to a different rate center, the potential premature exhaust of the 813 NPA through additional numbering resources needed by each ALEC to address customer needs in five rate centers instead of one, and even changes in the applicability of access charges on certain calls. The potential consequences of these issues is great and with far reaching consequences.

Notwithstanding your requests in your November 17th letter, it was learned late last week that Telcordia is nevertheless proceeding to implement the changes to RDBS and BRIDS effective February 1, 2001. These actions by Telcordia, the entity responsible for implementing the changes to RDBS and BRIDS, are apparently being undertaken without any communication to the ALECs that are affected by this action. Moreover, if we understand the situation correctly, the "universal" Tampa rate center to which most of the ALECs NXX codes are currently assigned is being terminated with the ALECs' codes being arbitrarily assigned by Telcordia to one of the five Verizon Tampa rate centers that will be effective after the RDBS and BRIDS changes. Since these assignments of the ALECs' NXX codes are being undertaken without the input of the affected ALECs, some assignments unquestionably will be to the wrong rate centers. In addition, this change from the "universal" Tampa rate center to any of the new five rate centers will immediately create the local calling scope, dialing pattern, compensation/access charges, new telephone number assignment, and NXX code/premature NPA exhaust problems that have previously been identified.

In view of the immediate, potentially damaging consequences of the February 1, 2001 implementation of the RDBS and BRIDS changes, I have been asked by the ALECs to write to you and request your immediate intervention. In view of the Commission's current calendar and the notification we received only this past Friday of these events, we did not see where it would be possible to file a formal petition and have that petition ruled upon in time to either stop the February 1st implementation or to provide the ALECs with the necessary time to prepare for the transition to five Tampa rate centers. Given the requests you made in your November 17th letter, and the representations Verizon made to you that are reflected in that letter, we believe the

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most appropriate course would be for the Commission Staff to immediately contact Verizon and direct Verizon to notify Telcordia that none of the RDBS and BRIDS changes, affecting Verizon or the ALECs, should be implemented unless and until such changes are approved by the Commission in a formally docketed matter in which all of the information and evidence can be received and considered.

I recognize that in view of the way that this matter has progressed over the last few months, and in particular last week, that the information the ALECs have may not be complete or accurate. The ALECs would like to believe that the information conveyed to them last week by Telcordia is wrong. However, the ALECs are certain that, at a minimum, comment, clarification, and compliance by Verizon and Telcordia on this matter is absolutely necessary in order to preserve the status quo and preclude any changes to RDBS and BRIDS affecting Verizon or ALEC NXX codes until formal Commission proceedings can be concluded.

In conclusion, we are simply asking that your November 17th requests, and Verizon's representations of compliance, be in fact complied with and that no changes to RDBS and BRIDS be undertaken for any carrier. We believe that a letter from you to Verizon requesting that Verizon advise Telcordia to cease any changes to RDBS and BRIDS should be sufficient to stop all action on this matter until Verizon can formally petition the Commission for approval to proceed. However, if in order to immediately proceed on this matter a formal petition is necessary by the ALECs, then the ALECs respectfully request that this letter be considered a petition for formal Commission action under chapters 120 and 364, Florida Statutes, to preclude any changes to RDBS and BRIDS affecting the Tampa rate centers. In addition, if necessary, this letter should also be considered a formal request for an emergency and immediate stay of the proposed RDBS and BRIDS changes pursuant to Rules 25-22.036, 28-106.201, 28-106.204, Florida Administrative Code. If necessary, please issue an emergency item for, and we will be prepared to appear and speak at, the next Commission Internal Affairs or Commission Agenda Conference, if action in this matter is required. I have also been directed to advise you that if the Commission Staff determines that the Commission is powerless to intervene in this matter, then the ALECs are prepared to seek relief in the courts and FCC, including the seeking of an injunction, in order to preclude any changes in RDBS and BRIDS affecting Verizon or any potentially affected ALEC. In whatever course you believe appropriate, it is imperative that definitive action to stop all changes to RDBS and BRIDS affecting Verizon and the ALECs be undertaken in the next few days so that any implementation actions will be stayed in advance of the proposed February 1, 2001, implementation date.

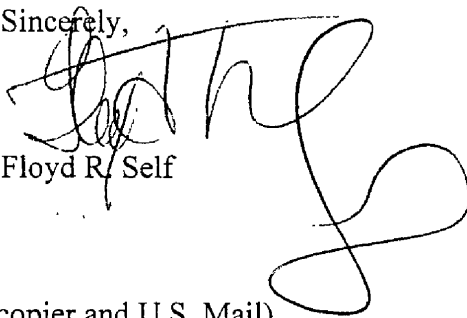
We are providing copies of this letter, including the August 15, 2000, October 25, 2000, and November 17, 2000, correspondence, to Verizon and Telcordia. By copy of this letter, the ALECs respectfully request that they immediately cease any changes RDBS and BRIDS and return all carriers to the status quo ante as it existed prior to Verizon's August 15, 2000, letter. I am also providing a copy of this letter to the Commission's Division of Records and Recording

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for retention as an undocketed matter unless you advise me that the Commission Clerk should record it as a docketed matter.

If you need any further information, or wish to be contacted by the ALECs, please let me know and I can pass along your questions or requests to them. Thank you for your immediate action on this matter.

Sincerely,


Floyd R. Self

FRS/amb
Attachment

cc: Ms. Beverly Menard (via e-mail, telecopier and U.S. Mail)
Ms. Cheryl Bulecza-Banks (by hand delivery)
Ms. Beth Salak (by hand delivery)
Ms. Sally Simmons (by hand delivery)
Mr. David Dowds (by hand delivery)
Mr. Bob Casey (by hand delivery)
Mr. Levent Ileri (by hand delivery)
Mr. Lennie Fulwood (by hand delivery)
Diana Caldwell, Esq. (by hand delivery)
Beth Keating, Esq. (by hand delivery)
Tim Vaccaro, Esq. (by hand delivery)
Division of Records and Reporting (by hand delivery)
Ms. Mary Ann Souther, Telcordia (by fax, email)
ALEC Distribution List (by email, fax, or hand delivery)

G. M. J. Berger

INTERCOMPANY CORRESPONDENCE



August 15, 2000

Reply To:
HQB11A06 - Irving, TX

To: Tampa Florida Industry Player

Subject: TAMPA Rate Center

This correspondence is to inform you of the forthcoming update to Telcordia's RDBS (Routing DataBase System) and BRIDS (Business Rating Input Database System) repositories to bring their LERG (Local Exchange Routing Guide) and V+H/TPM (Vertical and Horizontal Terminating Point Master) output products in sync with current Florida tariff language. The current effective date for this activity is February 1, 2001. The Florida PSC (Public Service Commission) is aware of this sync-up effort to tariff compliance.

If you are a code holder in the Tampa area, this most likely will impact your entries in RDBS and BRIDS.

The original and current tariff language reflects five specific rate centers: Tampa-North (TAMPANTH), Tampa-Central (TAMPACEN), Tampa-West (TAMPAWST), Tampa-East (TAMPAEST) and Tampa-South (TAMPASTH). At this time RDBS reflects only the rate center name of TAMPA.

All code holders should submit appropriate part 1 forms to NANPA (North American Numbering Plan Administrator) to correctly reflect the rate center of their code(s) as specified above in parentheses. NANPA has agreed that multiple codes may be submitted on one form per new rate center per OCN (Operating Company Name). However, all paperwork must comply with the minimum industry guideline time interval of 66 days.

Based upon the existing localities in RDBS we have included direction as to which rate area that locality would exist.

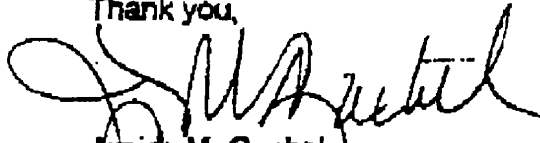
TAMPASTH	TAMPAEST	TAMPAWST	TAMPACEN	TAMPANTH
<u>Tampa South</u>	<u>Tampa East</u>	<u>Tampa West</u>	<u>Tampa Central</u>	<u>Tampa North</u>
APOLLO BCH	BRANDON	CITRUSPARK	GIBSONTON	LANDOLAKES
BALM	LIMONA	ODESSA	INTERBAY	LUTZ
RUSKIN	LITHIA	OLDSMAR	MACDILLAFB	
SUN CITY	SEFFNER		MANGO	
WIMAUMA	THONOTOSSS		PORT TAMPA	
	VALRICO		RIVERVIEW	
			SULPHURSPG	

TEMPLETRC

If you need further assistance with which rate center your switch/code is to reside, please refer to the boundary maps included in the tariff.

Please ensure that your decisions and updates to RDBS are timely to ensure correct routing and completion of calls for your subscribers.

Thank you,



Janice M. Goebel
Staff Specialist - Service Activation
VERIZON (f.k.a. GTE)
545 E John Carpenter Freeway
MC: HQB11A06
Irving, TX 75062

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October 25, 2000

VIA HAND DELIVERY

Mr. Walter D'Haeseleer
Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Mr. D'Haeseleer,

I am writing on behalf of many Florida ALECs to advise you of our concerns regarding the proposed Verizon (f/k/a GTE Florida) Tampa rate center updates to the Routing Database System (RDBS) and Business Rating Input Database System (BRIDS) effective February 1, 2001, and to request that the Florida Public Service Commission act to temporarily delay this action for 90 days, until May 1, 2001, to provide the affected carriers with additional time to identify the impacts this change will have on their customers or to seek alternatives to the proposed plan, as may be necessary.

The ALECs were first advised of these changes by a memorandum from Verizon dated August 15, 2000. In this letter, a copy of which is attached at Exhibit A, Verizon advised the carriers that their updates to the RDBS and BRIDS were necessary to bring the LERG and Vertical and Horizontal Terminating Point Master outputs in synch with the current Florida Verizon tariff language.

Information regarding these changes has been slowly making its way to the relevant industry participants, and the issues impacting the community have not yet been fully identified, nor have the impacts this change will have on their customers been explored. However, many carriers have been meeting in a series of conference calls over the last month to address their concerns, and in our last two calls representatives from Verizon have participated in an effort to provide additional information and assistance to the carriers. Verizon has been very cooperative, and their assistance has been appreciated by the ALECs, however, Verizon believes that it must proceed with this change on the current schedule.

Based upon these calls and other preliminary internal investigations, the carriers have identified several potential problems.

First, the proposed change will require the ALECs to obtain additional NXX codes in the 813 NPA in order to be able to serve customers within the appropriate rate centers identified by the LERG change. Several ALECs have made preliminary determinations that they may need at least 4 and possibly as many as 8 additional NXX codes. Multiplying this effect throughout the 813 NPA may accelerate the exhaust of the NPA, and depending upon the total number of ALECs needing codes, 813 could be forced into a premature jeopardy situation.

Second, the need for additional NXX codes means that customers may have to change to a completely different telephone number. This may occur because their current telephone numbers are assigned out a single Tampa rate center, and after these changes are effected the customer will need to be served out of one of the other Tampa rate centers. We understand that the Verizon network configuration may not permit porting in this situation, only further exacerbating customer confusion and prejudicing competition. We also believe that some ALECs may be required by their interconnection agreements with Verizon to mimic the Verizon local calling areas, thus giving the ALEC no choice but to change.

Third, there are potential impacts on competition, whether the carrier reconfigures its network, obtains new NXX codes, and changes customer telephone numbers or whether the ALEC does not change. For example, each rate center has different calling scopes, which impacts both the ALEC's ability to compete with Verizon for local customers and how customers perceive each competitor.

Fourth, Verizon's proposal raises the question of rate center consolidation or, alternatively, if Verizon's plan is completed, whether a number pooling trial should be undertaken as a part of this process. The ALECs view the changes required by Verizon's letter as a move away from rate center consolidation, which later will need to be reversed. Verizon has indicated it would consider rate center consolidation now, as an alternative to this plan, but that it must be kept whole financially by any such consolidation.

In addition to the foregoing matters, the limited participation among ALEC representatives raises the likelihood that several carriers are yet to be aware of the changes in rate center structure. Notwithstanding the efforts of Verizon to notify effected carriers, action now by the Florida Public Service Commission, in either a formal docket or through informal communications with carriers, would increase the response by the industry as a whole.

Mr. Walter D'Haeseleer
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These issues are still very preliminary, and they and other potential issues are subject to further data gathering, which is currently underway. Indeed, the carriers are now in the process of compiling specific additional NXX code needs which they propose to submit to the Commission for it to compile on a generic basis. With this industry data the total NXX code needs for the 813 NPA can be compiled, by each rate center, so that the Commission, ALECs, and Verizon will have a better idea as to the impact of this proposed change on the potential exhaust of the 813 NPA.

In terms of the present need, the ALECs need additional time to conduct their internal investigations and, in the case of NXX code needs, to get that information to the Commission so that it can compile a total NPA analysis. Given the fact that the current guidelines require at least 66 days to request and implement a new NXX code, the ALECs need to have their analysis completed no later than November 15th in order to timely meet the February 1, 2001 deadline. Based upon our current information, the requesting ALECs do not believe that there is sufficient time to compile the data and either begin the process of changing over necessitated by Verizon's letter and obtaining new NXX codes or to seeking other alternatives from this Commission. In any situation, it is critical to Verizon that if there is going to be a delay in the February 1st implementation date, or any other change, then Verizon needs to know this as soon as possible.

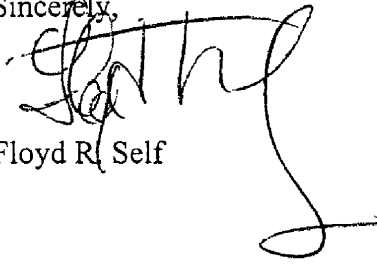
Accordingly, the ALECs that are a party to this letter hereby request that the Commission direct that Verizon delay the proposed Tampa rate center changes identified in its August 15, 2000, letter for 90 days, until May 1, 2001. During this extension, the ALECs will continue to compile and analyze the necessary data and advise the Commission as to whether they will proceed with Verizon's original plan or whether some other alternative solution should be pursued. As a part of this process, the ALECs propose submitting to the Commission, pursuant to the appropriate request for confidential treatment, their individual, potential NXX code needs by rate center for the Commission to compile into a total 813 NPA impact analysis.

If necessary, this matter should be scheduled as an additional or emergency item at either the November 6, 2000, Internal Affairs meeting or the November 7, 2000, Agenda Conference, as these are the only two formal Commission meetings scheduled in advance of the November 15th deadline. However, Verizon has indicated to us that it would be willing to delay the February 1st date upon a written request from the appropriate Commission Staff person in lieu of formal Commission action.

Mr. Walter D'Haeseleer
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We appreciate your prompt action on this matter. Since this is not currently a docketed matter, you may contact me on behalf of the ALECs and Beverly Menard at Verizon in order to transmit this information to the relevant people. Please feel free to contact me if you need any additional information or assistance with this matter.

Sincerely,


Floyd R. Self

FRS/amb
Attachment

cc: Ms. Beverly Menard (via telecopier and U.S. Mail)
Ms. Cheryl Bulecza-Banks
Ms. Sally Simmons
Mr. Bob Casey
Mr. Levent Ileri
Mr. Lennie Fulwood
Diana Caldwell, Esq.

Jim Berger

INTERCOMPANY CORRESPONDENCE



August 15, 2000

Reply To:
HQB11A06 - Irving, TX

To: Tampa Florida Industry Player

Subject: TAMPA Rate Center

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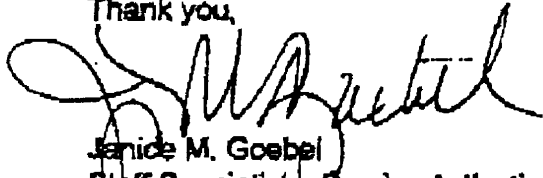
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SUN CITY	SEFFNER		MANGO	
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Thank you,



Janice M. Goebel
Staff Specialist - Service Activation
VERIZON (f.k.a. GTE)
545 E John Carpenter Freeway
MC: HQB11A06
Irving, TX 75062

STATE OF FLORIDA

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BRAULIO L BAEZ



DIVISION OF COMPETITIVE SERVICES
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

November 17, 2000

Ms. Beverly Y. Menard, Assistant Vice President
Regulatory & Governmental Affairs
Verizon Florida, Inc.
c/o Mr. David Christian
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704

RE: Verizon's proposed updates to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS)

Dear Ms. Menard:

It has come to my attention that Verizon has already proceeded with some modifications to the Local Exchange Routing Guide (LERG) for the Tampa Rate Centers. As a result of the information obtained from staff's data requests and the November 13, 2000 conference call concerning the Tampa Rate Centers, I am requesting that Verizon delay any further updates to the RDBS and BRIDS indefinitely. This delay will enable our staff to review the impact that such changes would have on the industry and customers. It is my understanding from conversations with you that Verizon is willing to defer this matter pending a staff review of the proposed updates.

Based on limited input received by the Commission, it appears the alternative local exchange companies do not anticipate a problem with the changes made to date. Staff, however, has yet to assess the full impact of these changes. While we do not condone Verizon's premature changes to the LERG, the Commission staff will not commence any actions at this time.

I recommend that Verizon file the proposed updates to the Tampa RDBS and BRIDS with the Commission in the form of a petition which could be docketed. If you have any questions, please contact Bob Casey at (850) 413-6974, or Levent Ileri at (850) 413-6562.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter D'Haeseleer".

Walter D'Haeseleer
Director

WD/rc

cc: Division of Competitive Services (B Salak, C. Bulecza-Banks, S. Simmons, D. Dowds,
B. Casey, L. Ileri, L. Fulwood)
Division of Legal Services (D. Caldwell)
Mr. Floyd R. Self, Messer, Caparello & Self
Ms. Karen M. Camechis, Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.

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FLOYD R. SELF

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