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January 24, 2001

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

Subject: Tampa Rate Center

Dear Mr. D'Haeseleer:

This letter is in response to Mr. Self's January 23, 2001 letter. Verizon is adamantly opposed to some of Mr. Self's requests. Verizon has tried to be very accommodating during this process. However, part of the fault may be mine in not insuring that all parties were aware of Verizon's positions and rationale by outlining it formally in correspondence. Therefore, this letter is an attempt to do so.

Unfortunately, when Verizon (f/n/a GTE) Florida turned over the number assignment duties to Lockheed Martin, it would have been in everyone's best interest if the LERG had been modified at that time to conform to Verizon's tariffs since the knowledge level and special accommodations that were in place would not be continued. At that point in time, there would have been very few, if any, ALEC codes which would have been impacted by the change. The subject of rate centers and their implications for local number portability were discussed at the FPSC staff workshops that were held. On October 24, 1997, I prepared a table to show the problems with the Tampa rate center which was given to Stan Greer, then with the FPSC staff, and it was discussed in one of the FPSC workshops. GTE was very clear on the fact that there were five rate centers in Tampa which were not properly reflected in the LERG, but properly reflected in all GTE tariffs, and the implications it would have on number portability in the Tampa area.

Prior to the transfer of the Florida code administration function, when new NXXs were established, a manual mode of phone calls, faxes, etc. was used to determine the calling scope of any new NXX established since it could not be determined by the LERG assignments. The transfer to Neustar occurred on June 6, 1998 and Lockheed Martin stated that they would not continue the manual process.

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Verizon is a member of an industry forum for the discussion on issues regarding RDBS (Routing DataBase System which is the Telcordia system that houses NPA-NXX code information) called CIGRR (Common Interest Group on Routing and Rating). In April 1999, in response to the ongoing industry concerns posed at CIGRR, GTE broke out the localities for their codes to reflect which of the existing five-tariffed rate centers in Tampa the code resided. Since the locality population is at the discretion of the OCN, there was no way to insure that other service providers would do the same population. At future meetings, it was discussed that there continued to be an issue as to not knowing how to route and rate the call properly in the network for the Tampa area via the LERG/RDBS. A work group was formed with representatives from Neustar, Sprint, BellSouth, KMC, GTE Wireless, Telcordia, Alltel and GTE.

There were three conference calls held on April 19, 2000, May 17, 2000 and June 28, 2000. As a result of the conference calls, I contacted Levent Ileri to make him aware of the industry effort to make the LERG consistent with GTE's tariffs. The due date for the conversion was determined with compliance to all current industry guidelines. On August 17, 2000, letters were drafted and sent via registered mail or registered e-mail to all OCNs with the Tampa area by GTE under their new Verizon letterhead. At that time, the new rate center names and localities were requested by Verizon to be built in RDBS by Telcordia. Verizon also went ahead and made all the required changes to their NXXs with the planned effective date of February 1, 2001.

After the notifications were sent, a number of conference calls were held with various members of the ALEC industry to help explain the changes and the impact it would have on the ALECs. As a result of the conference calls, a number of exhibits were prepared to assist the ALECs in determining the proper rate center for their customers. Attachment 1 was done to outline the various Tampa rate centers and the calling scopes of the rate centers. An initial list was prepared to identify the zip codes by rate center which was sent. I then obtained a series of maps for Tampa and using the legal descriptions contained in Section A200 of the tariffs (which was discussed with the ALECs as to its availability for identifying the boundaries of the rate centers), I refined the list of zip codes (Attachment 2) which was then sent to the carriers. In addition, I offered that any ALEC could email me addresses and we would verify them in our databases and let them know the proper Tampa rate center for the address.

Throughout this process, there has been a misconception relative to the Tampa rate center. Verizon is not converting, expanding, or changing the currently tariffed Tampa rate centers. We are only correcting the RDBS system and its output products to match what is currently reflected in the tariff and our switches. We are eliminating a manual process which existed when GTE was the Florida Code Administrator and was not continued after the transition of the function to Lockheed-Martin, now Neustar.

Historically, the ALECs' NXXs have been established as a Tampa Central rate center. The rationale (which was discussed with any ALECs who established codes when GTE was the administrator) was that most ALECs were starting their services for business customers located in the downtown area. As a result, Tampa Central was the code

used for the ALEC NXXs in all GTE switches and GTE's billing system. This meant that if a customer was physically not located in Tampa Central, took a number change to be reflected in the ALEC's NXX, and then subsequently wanted to return to GTE, that a number change would be required for GTE to serve them. This arrangement has existed since local number portability was instituted in September 1998.

There has been a lot of concern that the proper recognition of the Tampa rate centers will have an impact on inter-carrier compensation. Since there is seven digit local calling between all Tampa rate centers and the calling scopes for all Tampa rate centers are reasonably comparable, my October 27, 2000 response to your data request outlined the only three scenarios that Verizon can identify that may impact compensation. If Verizon's proposal to grandfather existing customers is followed, there will be no impact on compensation. As a result of these concerns and the ALECs' concerns on the ability to identify the proper rate centers for their customers, I requested a listing of all ALEC numbers in the 813 area code from our 911 database. I then went through the list and looked up every address in the post office database to determine the zip code for the address. Using Attachment 2, many addresses were then easily identifiable as to their proper rate center. For the addresses that were not immediately identifiable, I then looked at my street address map to identify the proper rate center. As a result, I prepared an analysis showing the results of my study. I looked up over 58,000 addresses. The summary results are shown in Attachment 3 which was provided to the FPSC staff and the ALECs showing that for the rate centers which are simply shown as Tampa in the LERG (since some ALECs have started showing the proper Tampa rate centers in the location field of the LERG), over 98 percent of the customers using these ALEC codes are physically located in the Tampa Central rate center. Therefore, Tampa Central is the proper rate center for these existing codes.

In Mr. Self's October 25, 2000 letter, the ALECs requested a delay in the proposed Tampa rate center changes until May 1, 2001 to allow the ALECs additional time to complete their analysis. Verizon stated that if the FPSC requested such a delay, Mr. Verizon would be willing to accommodate this request. A meeting was held with FPSC staff and various ALECs on November 13, 2000 to discuss the Tampa rate center situation. After the meeting, Verizon contacted Sally Simmons to let the FPSC staff know that since Verizon had already made all the changes to the LERG to be effective February 1, 2001; we did not want to undo the changes that had been made. However, we committed to work with the industry to allow the ALECs to continue the use of the nonidentified Tampa rate center for a longer period of time. This discussion led to the November 17, 2000 letter.

I apologize for not formally responding to that letter at that time. However, I talked to Levent Ileri and Bob Casey and explained I could not determine what relief that Verizon should request in a petition. As explained previously, Verizon is not making any changes to routing, to the network or to the Tampa rate center. Therefore, I assumed that the FPSC staff would initiate a docket if they thought that a docket was required.

Since no docket was established, I assumed that any potential future changes to the Tampa rate center would be considered in Docket No. 981444-TL or whatever docket the FPSC staff is going to use to discuss the Florida Rate Center Consolidation Working Group Report which was sent to Diana Caldwell and Levent Ileri on September 28, 2000. At this point in time, there is still a legal question regarding the FPSC's authority to order any rate center consolidations under Chapter 364.

Verizon's interpretation of the November 17th letter was that Verizon would implement the changes to the LERG for the Verizon NXXs and the ALECs would continue to use the nonidentified Tampa designation for their rate centers. Verizon assumed that this process would continue until May 1, 2001 (the date requested by the ALECs) when the ALECs would then designate a rate center for their existing NXX codes (probably Tampa Central based on Verizon's analysis described above) and any future codes would be properly established in accordance with Verizon's tariffs until such time as the tariffs are changed. Verizon is working with both Neustar and Telcordia to insure that this process can continue. The only concern is that Neustar has requested that a final date be established when compliance would be due for any new NXX assignments. They have not agreed to an indefinite push out.

Verizon's recognition of Verizon's NXXs in the LERG/RDBS effective February 1, 2001 has no impact on customer's billing, switching arrangements or intercarrier compensation. All of the central offices in the Tampa rate center subtend the Tampa 02T tandem. All carriers reach these end offices through trunks to the 02T tandem or direct trunks to the end office. Verizon is continuing to treat all nondesignated ALEC NXX codes as Tampa Central rate center codes.

If the existing nondesignated ALEC NXX codes are converted to Tampa Central rate center codes effective May 1, 2001, there will be no impact on customer's billing, switching arrangements or intercarrier compensation.

As a result of some of the comments in Mr. Self's letter, Verizon has been in contact with Telcordia on this issue. Telcordia does not arbitrarily assign codes to rate centers. The only way for the codes to be moved is for the carriers themselves to file Part One forms with NANPA. Per Verizon's original request, effective February 1, 2001, Verizon and the ALECs will have the ability to use the proper Tampa rate center designations (Central, North, South, East or West) for any new NXXs requested. Telcordia will only be changing the rate center designation for the NXX codes requested by Verizon or by any other AOCN that has requested the changes. At Verizon's request, both Neustar and Telcordia still allow the capability for ALECs to order new NXXs using the nondesignated Tampa designation. However, as stated above, we would like to establish a definite date when new NXXs will only be established using the proper Tampa rate center designation for all carriers. Otherwise, we will continue to exacerbate the problems with local number portability and new ALECs may have wrong perceptions on the calling scope they receive with Verizon's customers.

Mr. Self's January 23rd letter discusses the need for some customers to receive new telephone numbers because of reassignment to a different rate center. Verizon has discussed the possibility of there being industry agreement (with FPSC staff approval) that existing customer's would be considered grandfathered in the Tampa Central rate center as long as they stay with the existing ALEC even if they are not physically located in the Tampa Central rate center. They would be allowed to add additional lines in the ALEC's NXX. Of course, as discussed above, if they decided to return to Verizon for service and they are not physically located in the Tampa Central rate center, the customer would be required to take a number change to be in accordance with the current local number portability guidelines. Verizon is not trying to penalize any existing customers or ALECs. However, it is not in anyone's long term interests if we continue the current situation (of people believing that there is only one Tampa rate center when there are actually five Tampa rate centers) which has caused a lot of misperceptions.

Verizon cannot agree to Mr. Self's request that none of the RDBS and BRIDS changes be allowed to take effect. Verizon contacted the FPSC staff in November to get approval for Verizon to implement the changes for the Verizon NXX codes effective February 1, 2001. As stated above, this change should have no impact on anyone. If anyone can identify an impact, Verizon will immediately address the situation. In addition, Verizon plans to continue to use the proper Tampa rate center for any new Verizon NXX code which Verizon requests. It makes no rational sense for Verizon to willingly file a new NXX in the LERG or RBDS that does not agree with their tariffs.

The other concern addressed in Mr. Self's letter is 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. Verizon is cognizant of these concerns. It was for these reasons that Verizon worked with Neustar to ensure that the proper recognition of the Tampa rate center by all carriers could be accommodated in the 813 area code. As addressed in the minutes of the industry meetings discussed above, this was an area which was addressed. As of May 17, 2000, there were 331 codes still available to be assigned in the 813 area code. The current date projected for area code relief in the 813 area code is fourth quarter 2006. As a result of the FCC's decision in CC Docket No. 99-200 in the order released on March 31, 2000, the 813 area code will be one of the area codes which will be included in the FCC's implementation schedule for implementation of thousands-block number pooling. However, at this time, we do not know when this will occur. In addition to rate center consolidation, if the FPSC has authority to implement it, thousands-block number pooling should also help in the conservation of telephone numbers.

Verizon requests as quick a resolution as possible to complete this conversion. Verizon would like to have all carriers order new NXXs using the proper Tampa rate center designation effective May 1, 2001. Due to any misperceptions that may have occurred during this time period, Verizon is willing to accommodate a further delay in the conversion of the existing ALEC NXX codes to the proper rate center designation and would recommend July 1, 2001 as the conversion date, with implementation of

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grandfathering for existing ALEC customers who do not reside in the Tampa Central rate center. In addition, for any ALEC which sends a written request to me, I will be glad to furnish my analysis of addresses for their NXXs. Due to concerns on customer proprietary information, I only want to provide this information based on written requests so that I can verify the LERG assignment of the NXX prior to furnishing the information to an ALEC.

If you have any questions or require additional information, please let me know.

Sincerely,

Beverly Y. Menard

Beverly Y. Menard
Assistant Vice President
Advocacy Support

BYM:wjh

Attachments

- c: Ms. Cheryl Bulecza-Banks (by fax)
- Ms. Beth Salak (by fax)
- Ms. Sally Simmons (by fax)
- Mr. David Dowds (by fax)
- Mr. Bob Casey (by fax)
- Mr. Levent Ileri (by fax)
- Mr. Lennie Fulwood (by fax)
- Diana Caldwell, Esq. (by fax)
- Beth Keating, Esq. (by fax)
- Tim Vaccaro, Esq. (by fax)
- Division of Records and Reporting (by U.S. Mail)
- Mr. Floyd R. Self (by fax and U.S. Mail)

2001 JAN 24 10 52 AM EST

Rate Center	Verizon Central Offices	CLLI	EAS	ECS
Tampa Central	Alafia Bayshore Beach Park Carrollwood East Hyde Park Tampa Main Seminole Sulphur Springs Sweetwater Temple Terrace University Wallcraft Westside Ybor	ALFAFLXA BYSHFLXA BHPKFLXA CRWDFLXA TAMPFLXE HYPKFLXA TAMPFLXX SMNLFLXA SLSPFLXA SWTHFLXA TMTRFLXA UNVRFLXA WLCRFLXA WSSDFLXA YBCTFLXA	Plant City	Clearwater Dade City (Sprint) Mulberry San Antonio (Sprint) St. Petersburg Tarpon Springs Zephyrhills
Tampa East	Brandon Thonotosassa	BRNDFLXA THNTFLXA	Plant City	Clearwater Mulberry St. Petersburg Tarpon Springs Zephyrhills
Tampa North	Land O' Lakes Lutz Wesley Chapel	LNLKFLXA LUTZFLXA WLCHFLXA	Plant City Zephyrhills	Clearwater Dade City (Sprint) Mulberry New Port Richey San Antonio (Sprint) St. Petersburg Tarpon Springs
Tampa South	Ruskin Wimauma	RSKNFLXA WIMMFLXA	Palmetto Plant City	Clearwater Mulberry St. Petersburg Tarpon Springs Zephyrhills
Tampa West	Keystone Oldsmar	KYSTFLXA OLDSFLXA	Clearwater Plant City	Mulberry New Port Richey St. Petersburg Tarpon Springs Zephyrhills

Note: All Tampa rate centers have local calling to all Tampa rate centers.

Zip Codes in the Tampa Rate Center

<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33534	33527*	33543*	33503	33626
33602	33565*	33544*	33547	34677*
33603	33587*	34610*	33570	
33604	33594	34639*	33586	
33605		34669*	33598	
33606				
33607				
33608				
33609				
33610				
33611				
33612				
33613				
33614				
33616				
33617				
33618				
33620				
33621				
33624				
33629				
33634				
33637				

Shared Zip Codes in the Tampa Rate Center

<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33510	33510 (mainly)			
33511	33511 (mainly)			
33547*	33547* (mainly)			
33549		33549 (mainly)		33549 (smidgen)
33556 (small)				33556 (mainly)
33569 (mainly)	33569		33569	
33572			33572 (mainly)	
33573 (smidgen)			33573 (mainly)	
33584	33584			
33592 (smidgen)	33592 (mainly)			
33615 (mainly)				33615
33619 (mainly)	33619 (smidgen)			
33625				33625
33635				33635 (mainly)
33647	33647	33647		

* Zip code also includes exchanges outside the Tampa rate center

ALEC Codes in 813 NPA Tampa Exchange

	No. of Codes	Total	Central	East	North	South	West	Non-Tampa
Designated Tampa Rate Centers								
No Assignments	7							
Assignments	6							
Total	13	471	370	45	30	0	24	2
Percentage			78.56%	9.55%	6.37%	0.00%	5.10%	0.42%
Excl. Non-Tampa			78.89%	9.59%	6.40%	0.00%	5.12%	
Non Designated Tampa Rate Centers								
No Assignments	22							
Assignments	31							
Total	53	59385	58366	72	82	19	576	270
Percentage			98.29%	0.12%	0.14%	0.03%	0.97%	0.45%
Excl. Non-Tampa			98.73%	0.12%	0.14%	0.03%	0.98%	
All Tampa Rate Centers								
No Assignments	29							
Assignments	37							
Total	66	59856	58736	117	112	19	600	272
Percentage			98.13%	0.20%	0.19%	0.03%	1.00%	0.45%
Excl. Non-Tampa			98.57%	0.20%	0.19%	0.03%	1.01%	