



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

## -M-E-M-O-R-A-N-D-U-M-

---

**DATE:** FEBRUARY 1, 2001

**TO:** DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

**FROM:** DIVISION OF COMPETITIVE SERVICES (CASEY, BULECZA-BANKS)  
DIVISION OF LEGAL SERVICES (FORDHAM) *ce* *FR* *2003* *10/18*

**RE:** DOCKET NO. 010102-TP - INVESTIGATION OF PROPOSED UPDATES  
TO THE ROUTING DATABASE SYSTEM (RDBS) AND BUSINESS RATING  
INPUT DATABASE SYSTEM (BRIDS) AFFECTING THE TAMPA  
TELECOMMUNICATION CARRIERS

**AGENDA:** 2/6/2001 - REGULAR AGENDA - PROPOSED AGENCY ACTION -  
INTERESTED PERSONS MAY PARTICIPATE

**CRITICAL DATES:** 3/19/2001 - HEARING

**SPECIAL INSTRUCTIONS:** NONE

**FILE NAME AND LOCATION:** S:\PSC\CMP\WP\010102TP.RCM

---

### CASE BACKGROUND

On April 2, 1999, this Commission filed a petition with the Federal Communications Commission (FCC) seeking authority to implement number conservation measures, which would help minimize consumer confusion and expenses associated with imposing new area codes too frequently. On September 15, 1999, the FCC issued an Order granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures. (FCC 99-249) By Order No. PSC-00-543-PAA-TP, issued March 16, 2000, the Commission approved portions of staff's recommendation to exercise the federal authority to conserve telephone numbers and delay the early exhaustion of area codes in Florida.

On August 15, 2000, Verizon Florida, Inc. (Verizon) sent a letter to Tampa area codeholders informing them of forthcoming

DOCUMENT NUMBER-DATE

01478 FEB-16

FPSC-RECORDS/REPORTING

updates to Telcordia's<sup>1</sup> Routing Database System (RDBS) and Business Rating Input Database System (BRIDS). The updates, to be effective February 1, 2001, were intended to bring the Local Exchange Routing Guide (LERG)<sup>2</sup> and Vertical and Horizontal Terminating Point Master (V+H/TPM)<sup>3</sup> in sync with Verizon's current Florida tariff language. The letter notified the Tampa codeholders that this would likely impact their entries in the RDBS and the BRIDS. Verizon stated that its current tariff language reflects five specific rate centers in Tampa: Tampa-North, Tampa-Central, Tampa-West, Tampa-East, and Tampa-South. However, the RDBS reflects only the rate center name of Tampa. Verizon also stated that Tampa codeholders should submit Part 1 forms (new NXX, change NXX, or delete NXX form) to the North American Numbering Plan Administrator (NANPA) designating the proper rate center for each of its codes.

On October 25, 2000, staff received a letter from Mr. Floyd R. Self, on behalf of many Florida Alternate Local Exchange Companies (ALECs). Mr. Self expressed concerns over the impact Verizon's updates would have on ALECs in the Tampa area. Among the concerns were the following:

- 1) 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.
- 2) The need for additional NXX codes means that customers may have to change to a completely different telephone number.
- 3) 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.
- 4) Verizon's proposal raises the question of rate center consolidation or, alternatively, if Verizon's plan is

---

<sup>1</sup> Telcordia Technologies is the industry routing and database administrator.

<sup>2</sup> The LERG is a Bellcore document which lists all North American central offices and describes their relationship to tandem offices.

<sup>3</sup> V&Hs were developed by the telecommunications industry to simplify the calculations needed to determine the straight-line airline distance between two sets of geographical points.

completed, whether a number pooling trial should be undertaken as part of the process.

The ALECs stated additional time was needed to conduct investigations into the ramifications, if any, of Verizon's actions. A request was made for the Commission to act to temporarily delay Verizon's action for 90 days, until May 1, 2001.

An informal staff meeting was conducted on November 13, 2000 to discuss Verizon's Tampa Rate Center updates to the RDBS and BRIDS. All interested persons were invited to attend the meeting either in person, or via telephone. After the discussion of the proposed updates, it was determined the carriers still needed time to ascertain how the Verizon updates would affect them.

Also on November 13, 2000, staff received a letter from Time Warner Telecom of Florida, L.P., requesting that the Commission take action to delay Verizon's proposed Tampa rate center changes for 90 days, until May 1, 2001.

After the November 13, 2000 meeting, staff became aware that Verizon had already taken action to direct modifications to the LERG for the Tampa Rate Centers. On November 17, 2000, the Director of the Division of Competitive Services (CMP) sent a letter to Verizon requesting that "Verizon delay any further updates to the RDBS and BRIDS indefinitely." The letter also suggested that "Verizon file the proposed updates to the Tampa RDBS and BRIDS in the form of a petition which could be docketed."

In answer to the Director's letter, the ALECs stated "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 the 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."

On January 23, 2001, staff received a letter from Mr. Self seeking immediate assistance on behalf of various ALECs, including ALLTEL, Intermedia, Sprint, Time-Warner, and WorldCom, as they had been advised by Telcordia that the proposed changes to the RDBS and

BRIDS were going to be effective February 1, 2001, contrary to the CMP Director's November 17, 2000 request.

Staff immediately contacted Verizon for an explanation and received its response in a January 24, 2001 letter. 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 non-identified 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 and any future codes would be properly established in accordance with Verizon's tariffs until such time as the tariffs are changed.

Verizon stated that its changes to the RDBS and BRIDS effective February 1, 2001 would have no effect on the ALECs, and the ALECs would have an option when requesting an NXX to designate one of the five rate centers developed by Verizon, or just have their NXX assigned to "Tampa" rate center. Staff contacted Telcordia and the NANPA and verified that this option is temporarily available to ALECs requesting codes, pending a Commission resolution. This recommendation addresses the need for immediate action on behalf of the Commission.

This Commission has authority to address area code relief pursuant to 47 C.F.R. §§ 52.3 and 52.19. In addition, as part of our ongoing effort to conserve area codes, on April 2, 1999, we filed a petition with the Federal Communications Commission (FCC) seeking authority to implement number conservation measures, which could help minimize consumer confusion and expenses associated with imposing new area codes too frequently. On September 15, 1999, the FCC issued Order FCC 99-249, granting our Petition for Delegation of Additional Authority to Implement Number Conservation Measures. Among other things, FCC 99-249 granted us interim authority to set numbering allocation standards, request number utilization data from all carriers, implement NXX code sharing, and implement rate center consolidation.

**DISCUSSION OF ISSUES**

**ISSUE 1:** Should the Commission require Tampa area codeholders requesting NXX codes, to designate "Tampa" rather than one of the five rate centers developed by Verizon?

**RECOMMENDATION:** Yes. The Commission should require Tampa area codeholders to designate "Tampa" rather than one of the five rate centers developed by Verizon. However, if prior to August 15, 2000, a codeholder had requested the NXX code be assigned to one of the five Verizon developed rate centers, it can continue to do so with its new NXX codes if desired. This process should continue until a hearing has been held to thoroughly address the issue and a final order is issued. **(CASEY, BULECZA-BANKS)**

**STAFF ANALYSIS:** As discussed in the case background, Verizon took actions to direct Telcordia to modify the RDBS and the BRIDS to reflect five rate centers in the Tampa area. Because of Verizon's letter of August 15, 2000 notifying Tampa area codeholders of Verizon's changes to the RDBS and BRIDS, some carriers have already requested Telcordia make changes to their data to reflect five Tampa rate centers.

Staff's primary concern with Verizon's proposed changes relates to number conservation. If ALECs will be required to designate one of the five Tampa rate centers developed by Verizon when it receives an NXX code, ALECs may have to request a code in each of the five rate centers (50,000 numbers) to now establish a presence in the Tampa area. Presently, an ALEC can have one code (10,000 numbers) assigned as "Tampa" which would cover the same geographic area as the five rate centers developed and proposed by Verizon.

There are approximately 32 ALECs holding codes in the Tampa area. Assuming each ALEC presently has its NXX codes assigned as "Tampa" and not to one of the five Verizon developed rate centers, and each ALEC wants to maintain a presence in the same geographic area after the proposed changes, they would each have to request four additional codes, or 40,000 additional numbers. This could result in the unnecessary assignment of one hundred twenty eight codes (over 1.2 million numbers.) Currently, NANPA projects that 53 codes per year will be assigned in the Tampa area. Based on this assignment, NPA 813 is forecasted to exhaust in the fourth quarter of 2006. If, however, Verizon's proposed modifications to the RDBS and the BRIDS are allowed, the NPA 813 could exhaust as early as third quarter 2004. As area code planning should be started three

years prior to exhaustion, NPA 813 relief planning would have to be initiated this year.

In Order No. PSC-00-1046-PAA-TP, issued May 30, 2000, the Commission stated "we have established by numerous orders that area code conservation is necessary in this state." The order also stated "we agree with the FCC that any measure that increases the efficiency with which numbers are utilized will result in significant consumer benefits by helping to alleviate the disruption and expense associated with frequent area code exhaust." (See FCC 99-122)

Staff believes that the Verizon proposal will result in numerous requests for additional NXXs in the Tampa area, resulting in a premature exhaust of NPA 813. Although Verizon has stated it is only updating the RDBS and the BRIDS to get in sync with the Verizon tariff, in some respects, it is creating four new rate centers for ALECs in the Tampa area. Instead of rate center consolidation, it appears Verizon is creating rate center expansion which goes against number conservation goals promoted by this Commission.

Therefore, as an immediate stop-gap measure, staff recommends that the Commission require Tampa area codeholders to designate "Tampa," rather than one of the five rate centers developed by Verizon, when requesting NXX codes. However, if prior to August 15, 2000, a codeholder had requested the NXX code be assigned to one of the five Verizon developed rate centers, it can continue to do so with its new NXX codes if it desires.

**ISSUE 2:** Should the Commission order Verizon to cease any further actions to modify the RDBS and the BRIDS as it relates to the Tampa rate center designations?

**RECOMMENDATION:** Yes. The Commission should order Verizon to immediately cease any further actions to modify the RDBS and the BRIDS as it relates to the Tampa rate center designation. (**CASEY, BULECZA-BANKS**)

**STAFF ANALYSIS:** Verizon's modifications to the RDBS and the BRIDS are scheduled to take effect February 1, 2001. As indicated in its January 24, 2001 letter to the Director of the Division of Competitive Services, Verizon indicated that it requested both NANPA and Telcordia to allow the capability for ALECs to order new NXXs using the non-designated Tampa designation. However, Verizon also indicated that this process would continue only until May 1, 2001, at which time, the ALECs would then designate a rate center for their existing NXX codes.

Staff is greatly concerned that the rate center designation will lead to the premature exhaustion of NPA 813. As previously mentioned, implementation of the proposed modifications to the RDBS and the BRIDS could result in the exhaustion of NPA 813 as early as third quarter 2004. If the Commission does not take immediate action to cease further updates to the RDBS and the BRIDS, all ALECs in the Tampa area will be required to obtain NXX codes in all five Tampa rate centers, effective May 1, 2001. Therefore, The Commission should order Verizon to immediately cease any further actions to modify the RDBS and the BRIDS as it relates to the Tampa rate center designation.

**ISSUE 3:** Should this docket be closed?

**RECOMMENDATION:** No. Whether or not this decision is protested, this docket should remain open and an expedited hearing should be set to fully examine the impact of the proposed Tampa Rate Center RDBS and BRIDS changes. (**FORDHAM**)

**STAFF ANALYSIS:** The Commission's decision on those issues will become final upon issuance of a consummating order if no persons whose substantial interests are affected files a timely protest within 21 days. However, whether or not this decision is protested, this docket should remain open and an expedited hearing should be set to fully examine the impact of the proposed Tampa Rate Center RDBS and BRIDS changes.