

Mr. Walter D' Haeseleer
February 9, 2001
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Subject: Docket No. 010102-TP (Tampa Rate Center)

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, Verizon would be willing to accommodate the ALECs' request to delay implementation of the changes for their codes. 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 Verizon had already made all the changes to the LERG to be effective February 1, 2001, and we did not want to undo the changes that had been made. Verizon has approximately 120 NXX codes in the Tampa rate center and these changes were not really changing anything for the Verizon codes. 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.

Verizon's interpretation of the November 17th letter was that the date when the ALECs would be required to convert their codes was indefinitely delayed. As a result, Verizon worked with both Neustar and Telcordia to insure that the ALECs could continue to use the nondesignated Tampa rate center designation. The only concern was that Neustar has requested a finalized date of when compliance would be due for any new NXX assignments. They have not agreed to an indefinite push out. In accordance with your letter, the only change that Verizon requested was to defer the February 1, 2001 requirement for conversion of the ALECs' codes and implementation of the requirement to designate only the five Tampa rate centers effective February 1, 2001. Verizon has not given Telcordia or Neustar any other dates to utilize. The May 1 and July 1 dates in my letter were strictly a recommendation for the FPSC staff to consider since we did not have an established docket at that time dealing with the Tampa rate center and I did not send my letter to Telcordia or Neustar.

As a result of your January 26, 2001 letter, Verizon did contact Telcordia to determine if they could eliminate the Verizon changes that were scheduled to be effective February 1, 2001. However, we discovered a number of problems with this approach which we then discussed with Bob Casey. Due to the normal industry procedures, the TPM (terminating point master file) was sent to all carriers on January 25, 2001 with all the known changes in the LERG (also had other changes than the Tampa rate center). The only update that many carriers get for LERG changes is from the TPM file and they receive updates every 30 or 60 days. As a result, if Verizon attempted to eliminate the changes, many carriers might not get the notification for 60 days. Under emergency conditions, the quickest that changes can be made in the LERG is on five days notice. However, any carrier that does not get the emergency updates would not be aware until

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they received the TPM. In addition, Telcordia notified Verizon and the FPSC staff that other carriers also had changes reflecting the five Tampa rate centers. Therefore, there was no way that Verizon could eliminate the changes (and the changes are consistent with the LERG information that has been there since April 1999 and is reported on Schedule 19).

In accordance with the staff recommendation that was approved at the February 6, 2001 agenda, Verizon will be using the five Tampa rate centers for any new NXX codes that are established prior to the conclusion of Docket No. 010102-TP. Any required changes as a result of the Commission's decision in this docket will be done in accordance with the decision.

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

c: Mr. Bob Casey (by fax)
Division of Records and Reporting (by U.S. Mail)
Mr. Floyd R. Self (by fax and U.S. Mail)