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February 16, 2001

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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 001503-TP
Cost Recovery and Allocation Issues for Number Pooling Trials in Florida

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Post-Workshop Comments for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Cost Recovery and Allocation Issues) Docket No. 001503-TP
for Number Pooling Trials in Florida) Filed: February 16, 2001
_____)

POST-WORKSHOP COMMENTS OF VERIZON FLORIDA INC.

Verizon Florida Inc. submits its post-workshop comments as requested by Staff during the December 12, 2000 workshop in this proceeding. Specifically, Staff asked the parties to address the following:

- 1. What are the specific costs which would be eligible for recovery?

Response: The FCC identified three cost categories for number pooling: (1) shared-industry costs, (2) carrier specific costs directly related to number pooling, and (3) carrier specific costs not directly related to number pooling. The shared-industry costs are primarily tied to the costs associated with the set up and administration of the number pooling trials. A key portion of the shared industry cost is the cost of the number pooling administrator. In addition to the shared industry cost, individual companies incur cost in establishing processes and procedures for number pooling trials plus the cost associated with donating blocks. The donation of contaminated blocks is particularly costly because individual orders must be generated for as many as 100 numbers in a block of a 1000. All of the shared industry costs and carrier specific costs should be eligible for cost recovery.

- 2. To what extent will the costs be auditable?

Response: Generally speaking, shared industry costs are readily auditable in that they are tied to bills issued by the number pooling trial administrator. A significant

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portion of the Verizon specific costs are tied to company labor expense necessary to manage the blocks of numbers associated with pooling trials. In addition, costs are incurred in administering state level number pooling efforts. These costs are not as clear cut as a bill but may be tied to the number of hours required to prepare an area for number pooling plus the amount of labor and expenses necessary to implement a number pooling trial. At this time, Verizon does not plan to request any cost recovery at a state level for number pooling system enhancements. All system enhancements will instead be included in Verizon's national number pooling cost recovery filing with the FCC.

3. With the FCC's "but for" test, how on a practical basis do you implement it?

Response: Verizon can identify costs that it would not have incurred "but for" the implementation of thousand-block number pooling. The entire number pooling process involves additional steps that are not part of the normal numbering process so the costs associated with the extra labor, system enhancements, and shared industry costs can be identified.

4. What are we talking about in dollar impacts (both on a global basis and on an end user basis)?

Response: It is premature for Verizon to provide an estimate of the dollar impact. As noted in the response to question 2, Verizon does not plan to include any of the number pooling system development costs in the state number pooling trials, and therefore, our costs for number pooling will be tied primarily to the shared industry costs and the amount of manual effort required to support the pooling trials.

5. When do you want to implement a surcharge?

Response: Florida Verizon customers are currently charged a local number portability (LNP) surcharge of \$.36 per line per month. This federally mandated surcharge is to reimburse the Company for the cost of implementing local number portability and is scheduled to terminate no later than March 2004. Verizon proposes that the Florida PSC implement a surcharge in the same amount as the Federal LNP surcharge and implement it following termination of the Federal LNP surcharge. Verizon does not have exact figures for our number pooling costs but we estimate that two months of surcharge in the same amount as the Federal charge would allow us to recover our state specific costs. Verizon also plans to make a similar recommendation to the FCC to extend their Federal surcharge for the number of months necessary to allow cost recovery for the major system enhancements and other related costs that Verizon has incurred on a national basis.

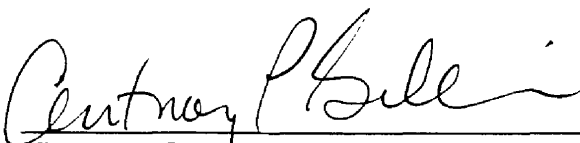
6. If the Federal plan is in effect by x date, would you be willing to forego state recovery until the federal plan is implemented?

Response: Verizon believes the FCC order requires the states to be responsible for recovery of any state-ordered pooling trials and Verizon would, therefore, not support foregoing state cost recovery unless a specific commitment is received from the FCC which would allow the Florida number pooling trial costs to be included in the national cost recovery.

7. If you implement an end user surcharge, would there be any exclusions; i.e., lifeline? Would there be true-up provisions (since the customer base would change over a 3 year period)?

Response: See Verizon's response to question 5. Verizon recommends that the Commission order a state level surcharge in the same amount as the Federal LNP surcharge (\$.36 per line) and implement this surcharge for two months immediately following cessation of the Federal charge. Verizon recommends that this surcharge be handled in exactly the same manner as the Federal LNP surcharge. We recommend adopting this approach and then making true-up provisions as we approach the cessation of the Federal surcharge, to ensure that the total surcharge collected equals the costs to be recovered.

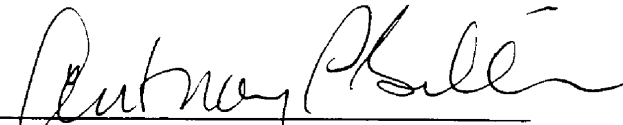
Respectfully submitted on February 16, 2001.

By: 
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Post-Workshop Comments in Docket No. 001503-TP were sent via U.S. mail on February 16, 2001 to the parties on the attached list.



for Kimberly Caswell

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