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February 16, 2001

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

Re: Docket No. 001503-TP

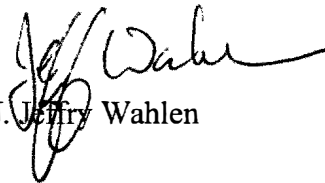
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Post Workshop Comments of ALLTEL Florida, Inc. and ALLTEL Communications, Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

Enclosures

cc: All parties of record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Cost Recovery and Allocation)	DOCKET NO. 001503-TP
Issues for Number Pooling Trials in Florida)	
<hr style="width: 50%; margin-left: 0;"/>)	Filed: 2/16/01

**POST WORKSHOP COMMENTS OF ALLTEL FLORIDA, INC. AND
ALLTEL COMMUNICATIONS, INC.**

ALLTEL Florida, Inc. and ALLTEL Communications, Inc. (together "ALLTEL") hereby jointly file the following post-workshop comments on cost recovery and allocation issues for number pooling trials:

1. ALLTEL believes it is more efficient and appropriate for the Florida Public Service Commission ("FPSC") to defer action on cost recovery procedures until such time as the Federal Communications Commission ("FCC") establishes permanent procedures for national number pooling. At that time, a single recovery system for both state and federal costs should be implemented.


2. At the December 12, 2000 workshop, several parties asserted that the FPSC should not establish an interim cost recovery mechanism. Those parties thought that it would be more prudent to wait until a national cost recovery mechanism is developed to avoid the administrative costs and burdens of a true-up and the creation of another separate distinct mechanism. ALLTEL believes that this is the most efficient way to proceed, particularly since all cost categories associated with number pooling have not yet been identified nor have the expenses associated with these cost categories been completely identified and accumulated. It is more efficient to identify and accumulate all costs associated with number pooling and proceed with one consistent cost recovery mechanism for both the national pooling process and the Florida specific pooling trials.

3. However, should this Commission choose to proceed with development of an interim cost recovery mechanism, ALLTEL believes that all costs, both shared industry costs and carrier-specific costs, associated with the number pooling trials in Florida should be eligible for recovery through a specific surcharge end-user per access line for a period of at least three (3) years, in a manner similar to the current Local Number Portability ("LNP") surcharge. The surcharge should be based upon each carrier's costs. The Commission should allow but not require ILECs, whether subject to rate-of-return or price regulation, to recover their costs associated with number pooling through this surcharge assessed on end-users. Those carriers not subject to rate of return regulation should be permitted to recover costs directly related to number pooling through this same optional process. If the Commission decides to act now and order an interim cost recovery mechanism, then at such time as the FCC establishes cost recovery procedures for national number pooling, a single, consistent, cost recovery mechanism should be implemented.

4. With respect to shared industry cost allocation, ALLTEL advocates that costs be allocated based on a "modified LNP method" which uses total company end-user revenues as the basis for allocation of costs.

As stated above, detailed cost information is currently not identified. The FCC has concluded that shared industry costs and carrier specific costs directly associated with number pooling are subject to cost recovery. This is consistent with the FCC's Numbering Resource Optimization Order in CC Docket No. 99-200. ALLTEL believes it makes sense to identify and accumulate all costs associated with number pooling and proceed with one recovery mechanism for both national number pooling and the Florida specific number pooling trials when the FCC establishes a permanent cost recovery mechanism.

DATED this 16th day of February, 2001.



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ATTORNEYS FOR ALLTEL
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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail this 16th day of February, 2001, to the following:

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