



Via Hand Delivery

Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

ORIGINAL

February 16, 2001

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

RECEIVED-FPSC
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RECORDS AND
REPORTING

Re: Docket No. 001503-TP, Number Pooling Cost Recovery and Allocation Issues

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of:

1. Post Workshop Comments *02241-01*
2. Request for Confidentiality (Redacted Version) *02242-01*

The confidential portions of the Post Workshop Comments, Attachment 2, are being filed under seal by separate letter. Copies of the above are hereby served on the parties of record pursuant to the attached certificate of service.

02243-01

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

Sincerely,

Susan S. Masterton

SSM/tk

Enclosures

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WWW
FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re. Cost recovery and allocation issues
For number pooling trials in Florida

Docket No. 001503-TP
Filed: February 16, 2001

SPRINT'S POST WORKSHOP COMMENTS

During the December 12, 2000 workshop, staff requested that the parties in this docket file post workshop comments in this docket. Therefore, Sprint's comments are as follows:

It is Sprint's position that number pooling cost recovery should be national in scope. All service providers benefit when numbers are conserved and the exhaust of NPAs and even the North American Numbering Plan (NANP) is delayed.

The Number Pooling cost allocation should follow the LNP (Local Number Portability) process already implemented¹. The pooling administrator cost should be a part of the costs being recovered. The cost allocation should be based on end user revenues and divided among all service providers nationwide

Sprint would like to see number pooling cost recovery rolled into a national mechanism from the beginning. This would allow just one end user surcharge that would cover both the state and the national, rather than having two surcharges on the customers' bills.

All number pooling costs should be recovered through an end-user surcharge. The surcharge should be an explicit, fixed monthly charge that is assigned per line (with the exception of Lifeline customers) and that is recovered over a three-year period². The surcharge should be service provider specific based on each carrier's individual costs. In order to have a single cost recovery mechanism at the national level, Sprint might be willing to postpone recovery depending on how long it takes the FCC to implement rules.

The amount of the surcharge should be determined via the same type methodology used to determine the LNP surcharge². That is, the carrier specific nationwide charges should be calculated and then an allocation for Florida should be determined based on the number of end-users. The surcharge amount should be developed based on the FCC's LNP cost recovery model. The surcharge should remain the same throughout the three-year recovery period. It is much less complicated to implement the surcharge as a fixed, three-year surcharge, furthermore, the FCC indicates that using the LNP based cost recovery method saves time for the regulator and the industry³. Sprint will not over recover because there will be ongoing costs associated with number pooling beyond the three year recovery period which will never be recovered via the surcharge

¹ FCC 00-429, Released December 29, 2000, Paragraph 179.

² Ibid.

³ FCC 00-104, Released March 31, 2000, Paragraph 193.

DOCUMENT NUMBER-DATE

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F F S C - R E C O R D S / R E P O R T I N G

The major categories for cost recovery are identified in the PowerPoint slides provided as Attachment 1. Mr Hoke Knox explained these categories at the December 12, 2000 staff workshop in this docket

Sprint's estimated capital and expense costs associated with Number Pooling are provided in Attachment 2 under cover of confidentiality. Also included on that attachment is the estimated end user surcharge amount based on estimated number pooling specific costs recovered over a three-year period.

In closing, Commission Staff has asked how the cost recovery and allocation issues should be handled, i.e., via a Proposed Agency Action (PAA), hearing process or workshop. Sprint believes that the PAA process may be the most efficient, given that one workshop has already been held and written comments solicited from all the parties. However, if the written comments indicate major disagreements between the parties or between some parties and staff, then perhaps a follow-up workshop should be held.

Respectfully submitted this 16th day of February, 2001.

Major Categories for Cost Recovery

- Operational Support Systems (OSS)
 - Telephone number inventory and assignment (CODARS)
 - » Modify systems from NXX to NXX-X
 - » Create 1K block utilization reports for state commissions
 - » Receipt and donation of 1K blocks from number pool administrator
 - » Identification of contaminated numbers in donated blocks
 - Customer Information Datastore (CIDS)
 - » Addition of pooling indicator to ensure that number pooled accounts are removed from the ported data and not returned in the snapback process during disconnect.
 - Customer Record and Billing (CRB)
 - » Modify CRB for accuracy of assignment numbers for number pooling block analysis.



Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Integrated Request Entry System (IRES)
 - » Telephone number assignment for CLEC customers
 - » Provide the ability to accurately manage the donatable and assignable inventory of numbers through a comprehensive number assignment process.
 - » Assign numbers from highly contaminated blocks first to allow sufficient blocks for pooling administrator.
 - Message Processing System (MPS)
 - » Collection and distribution of call detail records for billing.
 - » Modify system from NPA-NXX to NPA-NXX-X

Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Service Order Entry (SOE)
 - » Telephone number validation for service order activity.
 - » Provide the ability to accurately manage the donatable and assignable inventory of numbers through a comprehensive number assignment process.
 - » Assign numbers from highly contaminated blocks first to allow sufficient blocks for pooling administrator.
 - » Modify system to ensure that number pooled accounts are removed from the ported data and not returned in the snapback process during disconnect.
 - » Automate the generation of orders for contaminated telephone numbers with 1K blocks for donation to the Pooling Administrator.

Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Sprint Intelligent Computing Environment (SPICE)
 - » Telephone number validation for service order activity.
 - » Provide the ability to accurately manage the donatable and assignable inventory of numbers through a comprehensive number assignment process.
 - » Assign numbers from highly contaminated blocks first to allow sufficient blocks for pooling administrator.
 - » Modify system to ensure that number pooled accounts are removed from the ported data and not returned in the snapback process during disconnect.

Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Service Provider Look UP (SPLU)
 - » Modify system to provide the ability to determine the service provider for a 1K block for Service Assurance.
 - Switch Audit Process (SWAP)
 - » Automate audit of telephone numbers in switch to billing and number inventory systems to ensure accuracy for donation of clean and contaminated blocks for the Pooling Administrator.

Major Categories for Cost Recovery

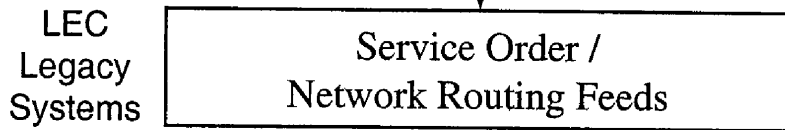
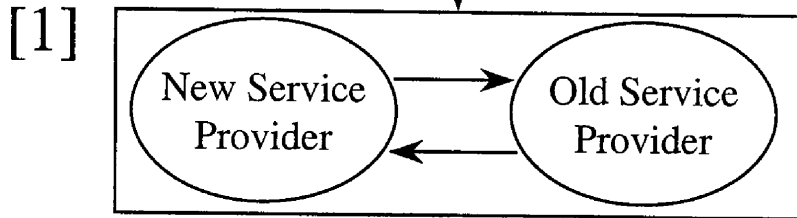
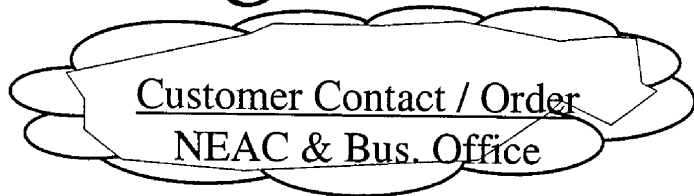
- Operations
 - Number inventory audit (manual process initially) for donation of clean and contaminated blocks for the Pooling Administrator.
 - Pooling Administrator report production.
 - Contaminated number porting.
 - Training.
 - Notification of end user charge.

Major Categories for Cost Recovery

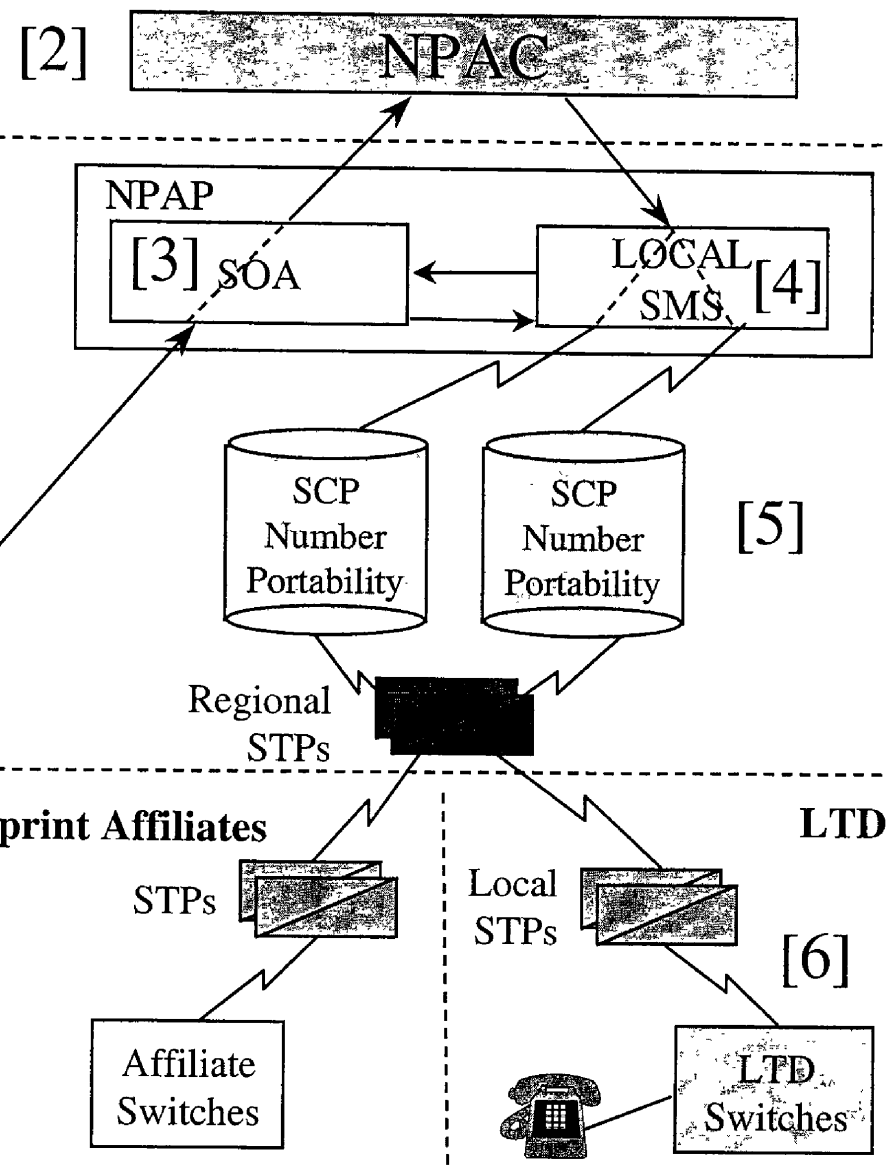
- Network
 - NPAC Statements of Work (SOW)
 - » SOW 4 NPAC Release 1.4 Number Pooling
 - » SOW 15 NPAC Release 3.0 Number Pooling
 - SS7 Components
 - » Additional SCP Hardware & Maintenance
 - » SCP Software to support number pooling.
 - SCP - Efficient Data Representation (EDR) upgrade.
 - » SCP Link additions for number pooling.
 - NPAP (Number Portability & Provisioning System)
 - » Local SMS upgrade to support number pooling with EDR
 - Upgrade existing switching systems for number pooling.



LNP Network Diagram



NEAC -- National Exchange Access Center
 LTD -- Local Telecommunications Division
 NPAC -- Number Portability Administration Center
 NPAP -- Number Portability Administration & Provisioning System
 SCP -- Service Control Point
 SMS -- Service Management System
 SOA -- Service Order Administration
 STP -- Signal Transfer Point



Number Pooling Surcharge

- LTD Estimated Capital (), Expense (\$)
- End User Surcharge
 - Monthly, Explicit, Non-mandatory
 - Applied for 3 Years
 - Service Provider Specific Based on Its Own Cost
- Without Specific Rules (FCC Order)
 - Estimated End User Surcharge @ \$ per month
 - » Using LNP Cost Recovery Model
 - » “But for Number Pooling” rule
 - » Calculation based on 3 year cost recovery period.

