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February 21, 2001

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 010102-TP

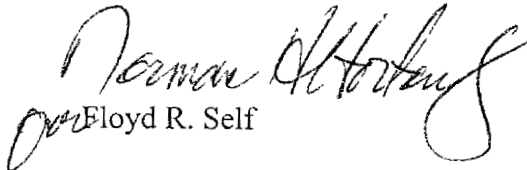
Dear Ms. Bayó:

Enclosed for filing on behalf WorldCom, Inc. are an original and fifteen copies of The Direct Testimony of James D. Joerger on behalf of WorldCom, Inc. in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

FRS/amb
Enclosure

cc: Donna Canzano McNulty, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

02437 FEB 21 01

FPSC-RECORDS, REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of The Direct Testimony of James D. Joerger on behalf of WorldCom, Inc. in Docket 010102-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 21st day of February, 2001.

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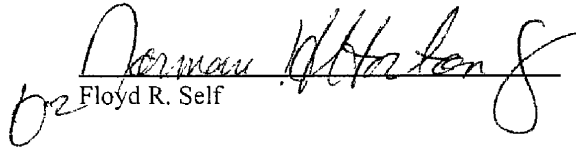
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Investigation of Proposed Updates to the)
Routing Data Base System (RDBS) and)
Business Rating Input Database System)
(BRIDS) Affecting the Tampa)
Telecommunications Carriers)
_____)

Docket No. 010102-TP

DIRECT TESTIMONY OF JAMES D. JOERGER

ON BEHALF OF

WORLDCOM, INC.

February 21, 2001

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is James D. Joerger. My business address is 2250 Lakeside Drive,
3 Dallas, Texas 75082.

4 **Q. WHOM ARE YOU EMPLOYED BY AND IN WHAT CAPACITY?**

5 A. I am employed by WorldCom, Inc. (“WorldCom”). I am the Senior Manager
6 of External Numbering Policy for the Corporation.

7 **Q. PLEASE BRIEFLY DESCRIBE YOU EDUCATIONAL**
8 **BACKGROUND AND YOUR PROFESSIONAL EXPERIENCE IN**
9 **THE TELECOMMUNICATIONS INDUSTRY.**

10 A. I received a Bachelors of Business Administration from Dallas Baptist
11 University in 1996. I also received an Associate Science Degree in
12 Electronic Technology from Triton Junior College in 1979.

13 I began my career in telecommunications in 1969 at Illinois Bell
14 where I served in various network operations and maintenance capacities
15 until becoming a network supervisor in 1979. As a supervisor, I managed a
16 group of technicians responsible for computer maintenance functions of
17 various Operational Support Systems used by the company throughout the
18 state. In 1985, I accepted a position as Central Office Engineer, performing
19 Operational Support Systems (“OSS”) computer and data communication
20 enhancements and additions. During this time the majority of my efforts
21 focused on Illinois Bell’s implementation of Common Channel Signaling
22 network upgrades for toll-free database services. In 1987, I served as a
23 systems planner in the Network Planning organization, and later accepted a
24 position as Manager, Network Planning, at Ameritech. As Manager of
25 Network Planning, I represented the company in national Common Channel

1 Signaling and network signaling protocol standards bodies and also managed
2 Bellcore's switching and signaling specifications work on behalf of the
3 Ameritech Operating Companies. I also advised the company's management
4 on Common Channel Signaling vendor software buyout agreements and
5 network node additions.

6 In 1990, I accepted a position at MCI Telecommunications
7 Corporation as Manager, Technical Standards Management. In this position
8 I represented the company in national standards development for various
9 network components, including Common Channel Signaling enhancements
10 for transitioning inter-company signaling between inter-exchange and the
11 regional Bell operating companies to the Signaling System Number 7
12 ("SS7") protocol for Feature Group D ("FGD") access. I also acted as MCI's
13 voting representative for Committee T1 standards and various industry
14 forums under the Alliance for Telecommunications Industry Solutions
15 ("ATIS," formerly "ECSA") umbrella, whose focus at the time was on
16 interconnection issues between access providers and access purchasers. In
17 1996, I accepted a position in MCI's local network expansion group.
18 Subsequently, I was promoted to Senior Manager of the External Numbering
19 organization in 1997 and retained that position following WorldCom's
20 merger with MCI in September 1998.

21 **Q. HAVE YOU PREVIOUSLY APPEARED IN PROCEEDINGS**
22 **BEFORE THIS COMMISSION?**

23 A. No, I have not testified or appeared before this Commission in any formal
24 proceedings. Nevertheless, I am very familiar with the Tampa rate area
25 issues that are the subject of this docket. I have been involved in the industry

1 planning and implementation efforts to introduce Local Number Portability
2 within the Florida Metropolitan Statistical Areas (MSAs). In addition, I have
3 coordinated WorldCom's positions for number pooling and area code relief
4 in the state of Florida.

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A. The purpose of my testimony is to address the impacts that result due to
7 Verizon's stated desire to change the Local Exchange Routing Guide (LERG)
8 classification of the rate areas that describe the Tampa metropolitan area. I
9 will comment on whether it is advisable to make this change and if not what
10 other remedies should be implemented.

11 **Q. WHAT IS VERIZON'S PROPOSAL THAT IS AT ISSUE IN THIS**
12 **DOCKET?**

13 A. According to Verizon, there is an inconsistency between its tariff and the
14 Location Exchange Routing Guide ("LERG"), which is now maintained by
15 Telecordia,. The tariff identifies five separate rate centers for the Tampa
16 area: Tampa Central, Tampa North, Tampa South, Tampa East, and Tampa
17 West. For purposes of my testimony, I will refer to these five Tampa rate
18 centers generally as the Tampa geographic rate centers. However, in the
19 LERG there is only one Tampa rate center, which has been designated as
20 "Tampa." For purposes of my testimony I will refer to the single market
21 area-wide Tampa rate center as the generic or universal Tampa rate center.

22 When Verizon was the code administrator it was able to somehow
23 identify and place NXX codes in the appropriate Tampa geographic rate
24 centers. This was apparently fine in a world where there was a monopoly
25 local telephone service provider. However, when the NXX Code

1 Administrator's functions were transferred to NeuStar as the NANPA and
2 local competition was permitted, new entrants were assigned codes to the
3 universal Tampa rate center. Verizon's proposal is to require all carriers with
4 codes in the Tampa universal rate center to assign the codes to one of the five
5 geographic rate centers.

6 **Q. WHEN WERE THE SERVICE PROVIDERS FIRST NOTIFIED OF**
7 **THIS SITUATION?**

8 A. Verizon sent out a memorandum on August 15, 2000, advising that the
9 service providers in the Tampa market area should make the necessary
10 changes to the LERG to be effective February 1, 2001. WorldCom
11 eventually received a copy of this memorandum. When WorldCom became
12 aware of this situation, we began to contact other carriers to discuss the
13 ramifications of Verizon's proposal. At our invitation, several carriers held
14 a conference call on September 29, 2000. We agreed during this call that
15 there were a number of potential adverse customer consequences of
16 Verizon's proposed changes. Subsequent to this call, the Tampa area service
17 providers have had a number of conference calls and meetings to further
18 identify the consequences of Verizon's changes. On several of the calls
19 representatives of Verizon have participated with us as well as Staff members
20 from the Florida Public Service Commission.

21 **Q. WHAT ACTIONS HAVE BEEN TAKEN BY THE SERVICE**
22 **PROVIDERS AFFECTED BY VERIZON'S PROPOSED CHANGES?**

23 A. Our first action was to attempt to better understand the meaning of Verizon's
24 proposed changes and the consequences to our customers and companies.
25 Knowing that changes in the LERG take 66 days or more to become

1 effective, on October 25, 2000, a number of the carriers prepared and sent to
2 Mr. Walter D'Haeseleer a letter identifying some of the potential problems
3 and the need to gather additional information. A copy of this letter is
4 attached to my testimony as Exhibit JDJ-1. In view of the minimum time to
5 complete LERG changes and our concerns for the potential adverse
6 consequences of Verizon's proposed changes, we requested that Verizon's
7 proposed changes at least be delayed until May 1, 2001. We sent a copy of
8 this letter to Verizon as well as to several of the ALECs.

9 **Q. HOW DID MR. D'HAESELEER RESPOND?**

10 A. The Commission Staff had apparently already engaged Verizon on this issue,
11 receiving a letter from Verizon dated October 27, 2000, with Mr.
12 D'Haeseleer writing on November 2, 2000, seeking additional information.
13 Also on November 13, 2000, the Staff noticed a workshop on this issue,
14 which many attended by telephone. On the basis of all of these events, Mr.
15 D'Haeseleer sent a letter to Verizon on November 17, 2000, requesting that
16 Verizon's proposed changes be filed with the Commission in the form of a
17 petition and docketed. Mr. D'Haeseleer's letter is attached as Exhibit JDJ-2.

18 **Q. WHAT HAPPENED NEXT?**

19 A. The service providers attempted to continue to gather information on the
20 company-specific impacts of Verizon's proposed changes, but we interpreted
21 Mr. D'Haeseleer's letter as indicating that no further action would be taken
22 by Verizon until they filed a petition with the Commission.

23 **Q. DID VERIZON FILE A PETITION?**

24 A. No. But in early January of this year, in a conversation with Telecordia, we
25 were advised that Verizon was moving forward with making the changes to

1 the LERG to reassign its NXX codes to the five geographic rate centers.

2 **Q. WHAT DID THE ALECS DO IN RESPONSE TO THIS**
3 **INFORMATION?**

4 A. We immediately conducted a conference call of the ALECs to discuss these
5 developments. On the basis of that discussion, we prepared and sent to Mr.
6 D'Haeseleer, with a copy to Verizon and Telecordia, a letter dated January
7 23, 2001. This is attached as Exhibit JDJ-3. In this letter we requested that
8 all actions cease and Mr. D'Haeseleer's directions in his November 13, 2000,
9 letter be complied with.

10 **Q. HOW DID THE COMMISSION RESPOND TO THIS JANUARY**
11 **LETTER?**

12 A. The Commission now opened a docket on its own initiative as responses
13 from both Verizon and Telecordia were returned to the Commission and the
14 ALECs. The Staff also prepared and filed on February 1, 2001, a Staff
15 Recommendation that was approved at the February 6, 2001, Agenda
16 Conference to proceed with a hearing on this issue.

17 **Q. SO WHAT IS THE RATE CENTER SITUATION IN TAMPA TODAY.**

18 A. The status quo today is six Tampa rate centers: the five geographic rate
19 centers to which the Verizon codes have been assigned plus one or two other
20 carriers and the original generic Tampa rate center to which all of the ALEC
21 and other service provider codes have been assigned.

22 **Q. SHOULD THE TAMPA MARKET AREA BE CONSIDERED ONE**
23 **RATE CENTER?**

24 A. Yes. From the beginning of when local competition began, ALECs conducted
25 business under the assumption of one rate area for the Tampa Market area.

1 When WorldCom received its numbering resources for the Tampa area,
2 NANPA issued codes for a single rate center to cover the entire Tampa
3 metropolitan area. WorldCom has built its business and developed its local
4 calling scope with the knowledge that the Tampa area was a single rate area.
5 Changing the number of rate areas to essentially expand the quantities of rate
6 areas, is contrary to effective numbering policy and the efficient use of
7 numbering resources. Therefore, WorldCom believes that one rate center
8 should continue to be associated with the Tampa Market area.

9 **Q. WHAT ARE THE OPTIONS THAT CAN BE USED TO RESOLVE**
10 **THIS MATTER?**

11 A. One option is to allow Verizon to continue operating using the five
12 geographic rate centers for Verizon's Tampa NXX codes and to allow the
13 generic Tampa rate center to continue as an "inconsistent rate area" for the
14 competitive service providers. A second option is to require Verizon to
15 remove the change applied to the LERG and continue describing the Tampa
16 area as a single rate area. Verizon would assert that the latter option would
17 be rate center consolidation, but this is the way they have operated for years.
18 A possible third option would be to gradually transition the competitive
19 service providers to the five rate area arrangement, but this is the least
20 desirable alternative.

21 **Q. HOW WOULD MULTIPLE RATE AREAS IMPACT NUMBERING**
22 **RESOURCES IN THE TAMPA MARKET AREA, SUCH AS IN**
23 **ALTERNATIVES ONE AND THREE YOU JUST DESCRIBED?**

24 A. The impact multiple rate centers will have on numbering resources in Tampa
25 will vary from service provider to service provider. However, one common

1 detriment to the industry as a whole and also working against the
2 Commission's efforts in achieving a comprehensive and sound numbering
3 policy is that adding or expanding the Tampa rate centers to five or six will
4 serve to prematurely exhaust the 813 NPA. This is due to the fact that
5 numbering resources today are assigned to service providers on a rate area
6 basis. This paradigm has existed for many years and will not change in this
7 matter or without further regulatory action. Indeed, the FCC has
8 acknowledged the rate area problem in its Further Notice of Proposed
9 Rulemaking in the Number Resource Optimization docket, fully realizing
10 that as long as service providers are required to maintain the current paradigm
11 of obtaining entire NXX codes (or numbering blocks where number pooling
12 is in place), service providers will continue to acquire more numbers than
13 may be needed. Rate Center Consolidation is one solution that can be
14 explored now by moving back permanently to a single rate area for Tampa.
15 Consequently, until the rate area paradigm is changed, adding rate areas as
16 Verizon proposes will accelerate the rate at which NXX codes are consumed
17 in the 813 NPA and thus, speed up the exhaust date for this NPA.

18 **Q. CAN YOU FURTHER EXPLAIN THE POTENTIAL NPA EXHAUST**
19 **PROBLEM IN TAMPA AS IT APPLIES TO COMPETITIVE**
20 **CARRIERS?**

21 A. Yes. At the present time the competitive service providers have numbering
22 resources presuming one rate center for Tampa. This was described to the
23 competitive carriers in the LERG which carriers use when planning entry into
24 a market to determine how many resources to request from the numbering
25 administrator. Under Verizon's proposed changes, the Tampa market area

1 would change from the current single rate area to five rate areas. Further,
2 those service providers who either desire to mimic Verizon's local calling
3 areas, or whom have interconnection agreements that require them to match
4 Verizon's calling area, would have to apply for some quantity of additional
5 NXX codes in each of the five geographic rate centers. Beverly Menard's
6 letter to Mr. D'Haeseleer dated January 24, 2001 makes this same assertion
7 at page 4.

8 **Q. IS THAT THE ONLY IMPACT?**

9 A. No. The service providers with a business plan whereby their rate areas
10 mimic Verizon's would need to conform to the change. These carriers would
11 need to determine what to do with their currently assigned NXX codes based
12 on where their customers reside. Essentially, the service provider would need
13 to geocode its existing customers in order to determine which Verizon
14 geographic rate center the customer would map to. If the NXX code was
15 assigned to one rate center, for example Tampa Central, but the customer
16 resides outside the Tampa Central rate area, the service provider would have
17 to get a new NXX code in that other rate center and the customer would have
18 to take a telephone number change. The new NXX code and the customer
19 telephone number change are required because rate area boundaries must
20 remain intact. Retaining this customer who would be subjected to the number
21 change is problematic, and even if the customer was retained the customer
22 would have numerous problems associated with notifying others of the new
23 number and, especially for business customers, incurring the costs of new
24 stationary, advertising, etc.

25 **Q. IN WORLDCOM'S OPINION, WHAT IS THE PREFERRED**

1 **COURSE OF ACTION?**

2 A. WorldCom would prefer that the industry return to the status quo that existed
3 prior to February 1, 2001, and have only one Tampa rate center.

4 **Q. IS WORLDCOM IMPACTED BY EVEN THE TEMPORARY**
5 **CREATION OF THE FIVE ADDITIONAL GEOGRAPHIC RATE**
6 **AREAS?**

7 A. Yes. Although WorldCom's local calling plan is not affected, we tend to
8 operate in terms of matching the incumbent rate areas. But since we are not
9 required to do so in this case, and we certainly do not wish to subject our
10 customers to number changes, we view this from the perspective of managing
11 the inconsistent rate area relationship.

12 The inconsistent rate area was created when Verizon's changes were
13 implemented in the LERG. Although we expected that those changes were
14 to be suspended pending the outcome in this docket, nonetheless, we were
15 forced to accommodate the change when that did not occur. In managing the
16 inconsistent rate area, we have had to institute a manual process for the time
17 being to associate every new service turnup and ported number to our rate
18 area so that our internal systems do not generate rate area violation trouble
19 reports.

20 **Q. IS WORLDCOM'S LOCAL CALLING AREA AFFECTED BY THE**
21 **CREATION OF THE FIVE RATE AREAS?**

22 A. No it is not.

23 **Q. ARE OTHER CARRIERS AFFECTED IN THE SAME WAY AS**
24 **WORLDCOM?**

25 A. WorldCom cannot speak for other service providers. However, we generally

1 know that the customer impacts I previously described would affect all
2 customers and that the carriers would experience provisioning, number
3 administration, and billing system changes that would need to be made to
4 reflect the inconsistent rate area changes.

5 **Q. ARE THERE ANY OTHER IMPACTS ASSOCIATED WITH**
6 **VERIZON'S PROPOSED CHANGES?**

7 A. Yes. While a pooling plan has not yet been adopted for the Tampa MSA, the
8 success of any future pooling plan for Tampa will be affected by the final rate
9 center arrangement for Tampa.

10 **Q. CAN YOU PLEASE EXPLAIN THOSE CONSEQUENCES.**

11 A. Number pooling is done on a rate center basis. Basically, the more rate
12 centers there are in Tampa, the more pools there are that must be created.
13 Obviously, one rate center for Tampa would require one pool, which should
14 maximize the potential to conserve numbers resources. At the other extreme,
15 today's six rate centers, would require not only six pools but also greatly
16 limit the usefulness of those pools.

17 **Q. HOW WOULD SIX POOLS BE LESS USEFUL?**

18 A. If there are six Tampa rate centers five geographic and one generic, only
19 Verizon and any other carriers that chose to utilize the geographic rate centers
20 could pool in the respective five geographic rate centers. Assuming the
21 ALECs did not assign their NXX codes to the five geographic rate centers,
22 then Verizon would basically be pooling numbers with itself. On the other
23 hand, the sixth pool would involve only those carriers with NXX codes in the
24 generic Tampa rate center, and they would pool only among themselves.

25 **Q. SHOULD A NUMBER POOLING TRIAL BE IMPLEMENTED IN**

1 **THE TAMPA METROPOLITAN STATISTICAL AREA? IF SO,**
2 **WHEN SHOULD THE NUMBER POOLING TRIAL BEGIN?**

3 A. Yes, a number pooling trial should be implemented in the Tampa MSA. The
4 trial should be implemented after Verizon reverses the changes to the LERG
5 and returns to a single Tampa rate center. In addition, pooling is best served
6 in concert with area code relief using pristine uncontaminated blocks for the
7 pool. One rate Center definitely enhances the longevity of the pool, rather
8 than the five rate center scenario that Verizon has proposed for the Tampa
9 MSA or the six that would exist if today's alignment were continued.

10 **Q. WHAT OTHER NUMBER CONSERVATION MEASURES SHOULD**
11 **THE COMMISSION ORDER IN THE TAMPA MARKET AREA? IF**
12 **ANY, WHEN SHOULD THESE MEASURES BE IMPLEMENTED,**
13 **AND HOW SHOULD THE COST RECOVERY BE ESTABLISHED?**

14 A. The most immediate measure would be a number pooling trial for NPA 813.
15 The trial should be implemented after Verizon reverses the changes to the
16 LERG and there is only one universal Tampa rate center. In regards to cost
17 recovery, WorldCom echoes the FCC which states that all shared industry
18 cost should be recovered through a competitively neutral cost recovery
19 mechanism. Furthermore, WorldCom has no opinion regarding a carrier
20 methodology for cost recovery of carrier-specific costs provided the
21 implemented methodology does not affect other carriers.

22 **Q. SHOULD VERIZON BE ORDERED TO IMPLEMENT RATE**
23 **CENTER CONSOLIDATION IN THE TAMPA MARKET AREA? IF**
24 **SO,**

25 **a. HOW MANY RATE CENTERS SHOULD BE**

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IMPLEMENTED?

b. WHEN SHOULD THE RATE CENTER CONSOLIDATION BE EFFECTIVE?

c. SHOULD VERIZON BE ALLOWED TO RECOVER ITS COSTS UPON CONSOLIDATION OF ITS RATE CENTERS IN THE TAMPA MARKET AREA, IF SO, HOW?

A. First, we must establish if Rate Center Consolidation is the appropriate definition for the action that should occur. Prior to February 1, 2001 all codes in the Tampa Market Area were designated in the LERG under the rate center heading of "Tampa." The ALEC carriers built their marketing and service offerings on the basis of the Tampa MSA having one rate center. This has been in effect for years, including the time that competitive carriers have operated in Tampa. WorldCom believes that the one rate center system prior to the Verizon changes should be effective immediately. If the Commission deems this is only possible through rate center consolidation, WorldCom request that such consolidation be undertaken. As to cost recovery for rate center consolidation or any other related implementation issues, Verizon should outline them to the Commission so they can be investigated.

Q. SHOULD VERIZON BE REQUIRED TO UNDO CHANGES MADE PRIOR TO AUGUST 15, 2000, IN ITS RDBS AND BRIDS SYSTEMS? IF SO, SHOULD VERIZON BE REQUIRED TO FILE A REVISED TARIFF REFLECTING ONE TAMPA RATE CENTER?

A. Yes, Verizon should be required to undo changes made prior to February 1, 2001 to the LERG and the associated systems. In addition, the Commission

1 should order Verizon to file a revised tariff reflecting one Tampa Rate Center.

2 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

3 A. WorldCom's position is that the most effective path forward is to describe the
4 Tampa metropolitan area as a single rate area. This step in WorldCom's view
5 is necessary to alleviate impacts that competitive service providers, albeit
6 some, would incur if required to conform to the five rate areas that Verizon
7 seeks to codify. Even if there are no impacts to competitive carriers and their
8 existing customers brought about by rate center boundary violations should
9 Verizon be allowed to proceed, the resultant impacts to the life of the 813
10 NPA would bring about a less efficient and undesirable numbering practice
11 at the same time this commission seeks to prolong the lives of NPAs.

12 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

13 A. Yes.

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October 25, 2000

VIA HAND DELIVERY

Mr. Walter D'Haeseleer
Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Mr. D'Haeseleer,

I am writing on behalf of many Florida ALECs to advise you of our concerns regarding the proposed Verizon (f/k/a GTE Florida) Tampa rate center updates to the Routing Database System (RDBS) and Business Rating Input Database System (BRIDS) effective February 1, 2001, and to request that the Florida Public Service Commission act to temporarily delay this action for 90 days, until May 1, 2001, to provide the affected carriers with additional time to identify the impacts this change will have on their customers or to seek alternatives to the proposed plan, as may be necessary.

The ALECs were first advised of these changes by a memorandum from Verizon dated August 15, 2000. In this letter, a copy of which is attached at Exhibit A, Verizon advised the carriers that their updates to the RDBS and BRIDS were necessary to bring the LERG and Vertical and Horizontal Terminating Point Master outputs in synch with the current Florida Verizon tariff language.

Information regarding these changes has been slowly making its way to the relevant industry participants, and the issues impacting the community have not yet been fully identified, nor have the impacts this change will have on their customers been explored. However, many carriers have been meeting in a series of conference calls over the last month to address their concerns, and in our last two calls representatives from Verizon have participated in an effort to provide additional information and assistance to the carriers. Verizon has been very cooperative, and their assistance has been appreciated by the ALECs, however, Verizon believes that it must proceed with this change on the current schedule.

DOCKET 010102-TP
WITNESS: JOERGER
EXHIBIT NO. _____ (JDJ-1)
PAGE 1 OF 6

Based upon these calls and other preliminary internal investigations, the carriers have identified several potential problems.

First, 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. Several ALECs have made preliminary determinations that they may need at least 4 and possibly as many as 8 additional NXX codes. Multiplying this effect throughout the 813 NPA may accelerate the exhaust of the NPA, and depending upon the total number of ALECs needing codes, 813 could be forced into a premature jeopardy situation.

Second, the need for additional NXX codes means that customers may have to change to a completely different telephone number. This may occur because their current telephone numbers are assigned out a single Tampa rate center, and after these changes are effected the customer will need to be served out of one of the other Tampa rate centers. We understand that the Verizon network configuration may not permit porting in this situation, only further exacerbating customer confusion and prejudicing competition. We also believe that some ALECs may be required by their interconnection agreements with Verizon to mimic the Verizon local calling areas, thus giving the ALEC no choice but to change.

Third, 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. For example, each rate center has different calling scopes, which impacts both the ALEC's ability to compete with Verizon for local customers and how customers perceive each competitor.

Fourth, Verizon's proposal raises the question of rate center consolidation or, alternatively, if Verizon's plan is completed, whether a number pooling trial should be undertaken as a part of this process. The ALECs view the changes required by Verizon's letter as a move away from rate center consolidation, which later will need to be reversed. Verizon has indicated it would consider rate center consolidation now, as an alternative to this plan, but that it must be kept whole financially by any such consolidation.

In addition to the foregoing matters, the limited participation among ALEC representatives raises the likelihood that several carriers are yet to be aware of the changes in rate center structure. Notwithstanding the efforts of Verizon to notify effected carriers, action now by the Florida Public Service Commission, in either a formal docket or through informal communications with carriers, would increase the response by the industry as a whole.

These issues are still very preliminary, and they and other potential issues are subject to further data gathering, which is currently underway. Indeed, the carriers are now in the process of compiling specific additional NXX code needs which they propose to submit to the Commission for it to compile on a generic basis. With this industry data the total NXX code needs for the 813 NPA can be compiled, by each rate center, so that the Commission, ALECs, and Verizon will have a better idea as to the impact of this proposed change on the potential exhaust of the 813 NPA.

In terms of the present need, the ALECs need additional time to conduct their internal investigations and, in the case of NXX code needs, to get that information to the Commission so that it can compile a total NPA analysis. Given the fact that the current guidelines require at least 66 days to request and implement a new NXX code, the ALECs need to have their analysis completed no later than November 15th in order to timely meet the February 1, 2001 deadline. Based upon our current information, the requesting ALECs do not believe that there is sufficient time to compile the data and either begin the process of changing over necessitated by Verizon's letter and obtaining new NXX codes or to seeking other alternatives from this Commission. In any situation, it is critical to Verizon that if there is going to be a delay in the February 1st implementation date, or any other change, then Verizon needs to know this as soon as possible.

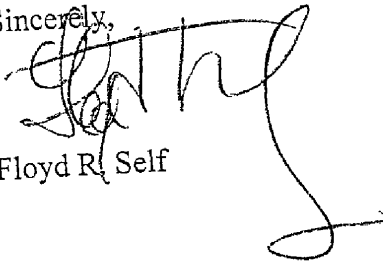
Accordingly, the ALECs that are a party to this letter hereby request that the Commission direct that Verizon delay the proposed Tampa rate center changes identified in its August 15, 2000, letter for 90 days, until May 1, 2001. During this extension, the ALECs will continue to compile and analyze the necessary data and advise the Commission as to whether they will proceed with Verizon's original plan or whether some other alternative solution should be pursued. As a part of this process, the ALECs propose submitting to the Commission, pursuant to the appropriate request for confidential treatment, their individual, potential NXX code needs by rate center for the Commission to compile into a total 813 NPA impact analysis.

If necessary, this matter should be scheduled as an additional or emergency item at either the November 6, 2000, Internal Affairs meeting or the November 7, 2000, Agenda Conference, as these are the only two formal Commission meetings scheduled in advance of the November 15th deadline. However, Verizon has indicated to us that it would be willing to delay the February 1st date upon a written request from the appropriate Commission Staff person in lieu of formal Commission action.

Mr. Walter D'Haeseleer
October 25, 2000
Page 4

We appreciate your prompt action on this matter. Since this is not currently a docketed matter, you may contact me on behalf of the ALECs and Beverly Menard at Verizon in order to transmit this information to the relevant people. Please feel free to contact me if you need any additional information or assistance with this matter.

Sincerely,



Floyd R. Self

FRS/amb
Attachment

cc: Ms. Beverly Menard (via telecopier and U.S. Mail)
Ms. Cheryl Bulecza-Banks
Ms. Sally Simmons
Mr. Bob Casey
Mr. Levent Ileri
Mr. Lennie Fulwood
Diana Caldwell, Esq.



August 15, 2000

Reply To:
HQB11A06 - Irving, TX

To: Tampa Florida Industry Player

Subject: TAMPA Rate Center

This correspondence is to inform you of the forthcoming update to Telcordia's RDBS (Routing DataBase System) and BRIDS (Business Rating Input Database System) repositories to bring their LERG (Local Exchange Routing Guide) and V+H/TPM (Vertical and Horizontal Terminating Point Master) output products in sync with current Florida tariff language. The current effective date for this activity is February 1, 2001. The Florida PSC (Public Service Commission) is aware of this sync-up effort to tariff compliance.

If you are a code holder in the Tampa area, this most likely will impact your entries in RDBS and BRIDS.

The original and current tariff language reflects five specific rate centers: Tampa-North (TAMPANTH), Tampa-Central (TAMPACEN), Tampa-West (TAMPAWST), Tampa-East (TAMPAEST) and Tampa-South (TAMPASTH). At this time RDBS reflects only the rate center name of TAMPA.

All code holders should submit appropriate part 1 forms to NANPA (North American Numbering Plan Administrator) to correctly reflect the rate center of their code(s) as specified above in parentheses. NANPA has agreed that multiple codes may be submitted on one form per new rate center per OCN (Operating Company Name). However, all paperwork must comply with the minimum industry guideline time interval of 66 days.

Based upon the existing localities in RDBS we have included direction as to which rate area that locality would exist.

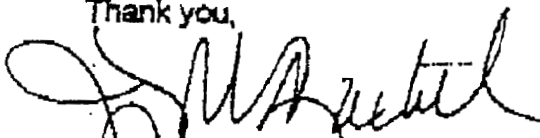
TAMPASTH	TAMPAEST	TAMPAWST	TAMPACEN	TAMPANTH
<u>Tampa South</u>	<u>Tampa East</u>	<u>Tampa West</u>	<u>Tampa Central</u>	<u>Tampa North</u>
APOLLO BCH	BRANDON	CITRUSPARK	GIBSONTON	LANDOLAKES
BALM	LIMONA	ODESSA	INTERBAY	LUTZ
RUSKIN	LITHIA	OLDSMAR	MACDILLAFB	
SUN CITY	SEFFNER		MANGO	
WIMAUMA	THONOTOSSS		PORT TAMPA	
	VALRICO		RIVERVIEW	
			SULPHURSPG	

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If you need further assistance with which rate center your switch/code is to reside, please refer to the boundary maps included in the tariff.

Please ensure that your decisions and updates to RDBS are timely to ensure correct routing and completion of calls for your subscribers.

Thank you,



Janice M. Goebel
Staff Specialist - Service Activation
VERIZON (f.k.a. GTE)
545 E John Carpenter Freeway
MC: HQB11A06
Irving, TX 75062

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Commissioners:
J. TERRY DEASON, CHAIRMAN
E. LEON JACOBS, JR.
LILA A. JABER
BRAULIO L. BAEZ



DIVISION OF COMPETITIVE SERVICES
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

November 17, 2000

Ms. Beverly Y. Menard, Assistant Vice President
Regulatory & Governmental Affairs
Verizon Florida, Inc.
c/o Mr. David Christian
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704

RE: Verizon's proposed updates to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS)

Dear Ms. Menard:

It has come to my attention that Verizon has already proceeded with some modifications to the Local Exchange Routing Guide (LERG) for the Tampa Rate Centers. As a result of the information obtained from staff's data requests and the November 13, 2000 conference call concerning the Tampa Rate Centers, I am requesting that Verizon delay any further updates to the RDBS and BRIDS indefinitely. This delay will enable our staff to review the impact that such changes would have on the industry and customers. It is my understanding from conversations with you that Verizon is willing to defer this matter pending a staff review of the proposed updates.

Based on limited input received by the Commission, it appears the alternative local exchange companies do not anticipate a problem with the changes made to date. Staff, however, has yet to assess the full impact of these changes. While we do not condone Verizon's premature changes to the LERG, the Commission staff will not commence any actions at this time.

I recommend that Verizon file the proposed updates to the Tampa RDBS and BRIDS with the Commission in the form of a petition which could be docketed. If you have any questions, please contact Bob Casey at (850) 413-6974, or Levent Ileri at (850) 413-6562.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter D'Haeseleer".

Walter D'Haeseleer
Director

WD/rc

cc: Division of Competitive Services (B Salak, C. Bulecza-Banks, S. Simmons, D. Dowds,
B. Casey, L. Ileri, L. Fulwood)
Division of Legal Services (D. Caldwell)
Mr. Floyd R. Self, Messer, Caparello & Self
Ms. Karen M. Camechis, Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.

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FLOYD R. SELF

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PAGE 1 OF 1

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TELECOPIER: (850) 224-4359
INTERNET: www.lawfla.com

January 23, 2001

VIA HAND DELIVERY

Mr. Walter D'Haeseleer
Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Emergency Request, Verizon's proposed updates to the Routing Data Base System ("RDBS") and Business Rating Input Database System ("BRIDS") affecting the Tampa rate center

Dear Mr. D'Haeseleer:

The purpose of this letter is to follow up on my letter of October 25, 2000, and your letter to Beverly Menard of November 17, 2000 regarding the proposed updates to the Routing Data Base System ("RDBS") and Business Rating Input Database System ("BRIDS") affecting the Tampa rate center that Verizon indicated in a August 15, 2000, letter would become effective on February 1, 2001. I have been asked to again write to you and seek your immediate assistance on behalf of various ALECs, including ALLTEL, AT&T, Intermedia, Sprint, Time-Warner, and WorldCom, as we have been advised by Telcordia that the proposed changes to the RDBS and BRIDS are going to be made effective February 1, 2001, contrary to your November 17, 2000, directive to Verizon.

As you will recall, in my October 25th letter to you I identified several concerns of the ALEC community regarding Verizon's proposed changes to RDBS and BRIDS. In your letter of November 17th, you requested that "Verizon delay any further updates to the RDBS and BRIDS indefinitely," and you recommended that "Verizon file the proposed updates to the Tampa RDBS and BRIDS with the Commission in the form of a petition which could be docketed." Your letter indicated that Verizon would defer this matter pending a Staff review of the proposed updates.

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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 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. Such formal action by Verizon is appropriate since every ALEC and effectively every local customer, Verizon and ALEC alike, could be affected by the proposed changes. These changes include changes in local and toll calling scopes, changes in reciprocal compensation obligations, the need for some customers to receive new telephone numbers because of reassignment to a different rate center, the potential premature exhaust of the 813 NPA through additional numbering resources needed by each ALEC to address customer needs in five rate centers instead of one, and even changes in the applicability of access charges on certain calls. The potential consequences of these issues is great and with far reaching consequences.

Notwithstanding your requests in your November 17th letter, it was learned late last week that Telcordia is nevertheless proceeding to implement the changes to RDBS and BRIDS effective February 1, 2001. These actions by Telcordia, the entity responsible for implementing the changes to RDBS and BRIDS, are apparently being undertaken without any communication to the ALECs that are affected by this action. Moreover, if we understand the situation correctly, the "universal" Tampa rate center to which most of the ALECs NXX codes are currently assigned is being terminated with the ALECs' codes being arbitrarily assigned by Telcordia to one of the five Verizon Tampa rate centers that will be effective after the RDBS and BRIDS changes. Since these assignments of the ALECs' NXX codes are being undertaken without the input of the affected ALECs, some assignments unquestionably will be to the wrong rate centers. In addition, this change from the "universal" Tampa rate center to any of the new five rate centers will immediately create the local calling scope, dialing pattern, compensation/access charges, new telephone number assignment, and NXX code/premature NPA exhaust problems that have previously been identified.

In view of the immediate, potentially damaging consequences of the February 1, 2001 implementation of the RDBS and BRIDS changes, I have been asked by the ALECs to write to you and request your immediate intervention. In view of the Commission's current calendar and the notification we received only this past Friday of these events, we did not see where it would be possible to file a formal petition and have that petition ruled upon in time to either stop the February 1st implementation or to provide the ALECs with the necessary time to prepare for the transition to five Tampa rate centers. Given the requests you made in your November 17th letter, and the representations Verizon made to you that are reflected in that letter, we believe the

most appropriate course would be for the Commission Staff to immediately contact Verizon and direct Verizon to notify Telcordia that none of the RDBS and BRIDS changes, affecting Verizon or the ALECs, should be implemented unless and until such changes are approved by the Commission in a formally docketed matter in which all of the information and evidence can be received and considered.

I recognize that in view of the way that this matter has progressed over the last few months, and in particular last week, that the information the ALECs have may not be complete or accurate. The ALECs would like to believe that the information conveyed to them last week by Telcordia is wrong. However, the ALECs are certain that, at a minimum, comment, clarification, and compliance by Verizon and Telcordia on this matter is absolutely necessary in order to preserve the status quo and preclude any changes to RDBS and BRIDS affecting Verizon or ALEC NXX codes until formal Commission proceedings can be concluded.

In conclusion, we are simply asking that your November 17th requests, and Verizon's representations of compliance, be in fact complied with and that no changes to RDBS and BRIDS be undertaken for any carrier. We believe that a letter from you to Verizon requesting that Verizon advise Telcordia to cease any changes to RDBS and BRIDS should be sufficient to stop all action on this matter until Verizon can formally petition the Commission for approval to proceed. However, if in order to immediately proceed on this matter a formal petition is necessary by the ALECs, then the ALECs respectfully request that this letter be considered a petition for formal Commission action under chapters 120 and 364, Florida Statutes, to preclude any changes to RDBS and BRIDS affecting the Tampa rate centers. In addition, if necessary, this letter should also be considered a formal request for an emergency and immediate stay of the proposed RDBS and BRIDS changes pursuant to Rules 25-22.036, 28-106.201, 28-106.204, Florida Administrative Code. If necessary, please issue an emergency item for, and we will be prepared to appear and speak at, the next Commission Internal Affairs or Commission Agenda Conference, if action in this matter is required. I have also been directed to advise you that if the Commission Staff determines that the Commission is powerless to intervene in this matter, then the ALECs are prepared to seek relief in the courts and FCC, including the seeking of an injunction, in order to preclude any changes in RDBS and BRIDS affecting Verizon or any potentially affected ALEC. In whatever course you believe appropriate, it is imperative that definitive action to stop all changes to RDBS and BRIDS affecting Verizon and the ALECs be undertaken in the next few days so that any implementation actions will be stayed in advance of the proposed February 1, 2001, implementation date.

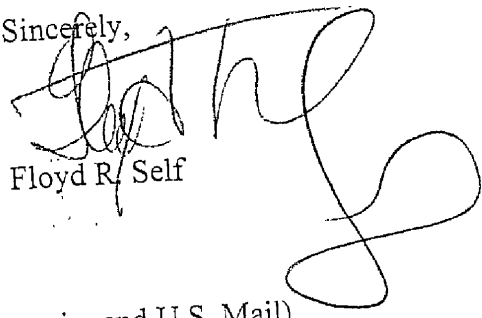
We are providing copies of this letter, including the August 15, 2000, October 25, 2000, and November 17, 2000, correspondence, to Verizon and Telcordia. By copy of this letter, the ALECs respectfully request that they immediately cease any changes RDBS and BRIDS and return all carriers to the status quo ante as it existed prior to Verizon's August 15, 2000, letter. I am also providing a copy of this letter to the Commission's Division of Records and Recording

Mr. Walter D'Haeseleer
January 23, 2001
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for retention as an undocketed matter unless you advise me that the Commission Clerk should record it as a docketed matter.

If you need any further information, or wish to be contacted by the ALECs, please let me know and I can pass along your questions or requests to them. Thank you for your immediate action on this matter.

Sincerely,


Floyd R. Self

FRS/amb
Attachment

cc: Ms. Beverly Menard (via e-mail, telecopier and U.S. Mail)
Ms. Cheryl Bulecza-Banks (by hand delivery)
Ms. Beth Salak (by hand delivery)
Ms. Sally Simmons (by hand delivery)
Mr. David Dowds (by hand delivery)
Mr. Bob Casey (by hand delivery)
Mr. Levent Ileri (by hand delivery)
Mr. Lennie Fulwood (by hand delivery)
Diana Caldwell, Esq. (by hand delivery)
Beth Keating, Esq. (by hand delivery)
Tim Vaccaro, Esq. (by hand delivery)
Division of Records and Reporting (by hand delivery)
Ms. Mary Ann Souther, Telcordia (by fax, email)
ALEC Distribution List (by email, fax, or hand delivery)

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