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March 9, 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 AT&T Communications of the Southern States, Inc., Intermedia Communications, Inc., and WorldCom, Inc. are an original and fifteen copies of their Joint Prehearing Statement in the above-referenced docket. Also enclosed is a 3 1/2" diskette with the document on it in WordPerfect 9.0 format.

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: Marsha Rule, Esq.  
Scott Sapperstein, Esq.  
Donna Canzano McNulty, Esq.  
Parties of Record

DOCUMENT NUMBER-DATE

03073 MAR-96

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Investigation of Proposed Updates to the Routing )  
Data Base System (RDBS) and Business Rating ) Docket No. 010102-TP  
Input Database System (BRIDS) Affecting the ) Filed: March 9, 2001  
Tampa Telecommunications Carriers )  
\_\_\_\_\_)

**PREHEARING STATEMENT OF  
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.,  
AT&T WIRELESS SERVICES, INC. ,  
INTERMEDIA COMMUNICATIONS, INC.,  
AND  
WORLD COM, INC.**

AT&T Communications of the Southern States, Inc., and AT&T Wireless Services, Inc. (collectively "AT&T"), Intermedia Communications, Inc. ("Intermedia"), and WorldCom, Inc. ("WorldCom"), through undersigned counsel, herewith jointly submit this prehearing statement.

**A. APPEARANCES**

For AT&T, Intermedia, and

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## B. WITNESSES

<u>Witness</u>	<u>Issues</u>
Felicia Anne Henderson (AT&T) (Direct and Rebuttal Testimony)	1-7
Kelly Faul (Intermedia) (Direct and Rebuttal Testimony)	1-7
Denise Thomas <sup>1</sup> (WorldCom) (Direct and Rebuttal Testimony)	1-7

## C. EXHIBITS

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
_____ JDJ-1	Thomas	Letter from carriers to Mr. D'Haeseleer dated October 25, 2000 identifying some of the potential problems and the need to gather additional information.
_____ JDJ-2	Thomas	Letter from Mr. D'Haeseleer to Verizon dated November 17, 2000, requesting that Verizon's proposed changes be filed with the Commission in the form of a petition and docketed.
_____ JDJ-3	Thomas	Letter from carriers to Mr. D'Haeseleer, with a copy to Verizon and Telecordia, dated January 23, 2001, requesting all actions cease and Mr. D'Haeseleer's directions in his November 13, 2000, letter be complied with.

AT&T and Intermedia do not intend to present any exhibits. AT&T, Intermedia, and WorldCom reserve the right to introduce exhibits, if necessary, as may be required by cross

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<sup>1</sup> The prefiled testimony for WorldCom was filed on behalf of James D. Joerger. Ms. Thomas will be substituted for, and will adopt, Mr. Joerger's direct and rebuttal testimony.

examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

#### **D. BASIC POSITION**

There has always been one rate center in effect for Tampa since before the introduction of local competition. Verizon's tariff and its internal controls have been transparent to, and unknown by, the rest of the industry. Verizon should be directed to recall any changes to the LERG and the BRIDS and RDBS systems and to file with the Commission its plan to undertake those necessary internal actions that are required to bring its operations into compliance with the rest of the industry.

#### **E. ISSUES AND POSITIONS**

**ISSUE 1:     Should the Tampa Market Area be considered one rate center? If not, what rate centers should be associated with the Tampa Market Area?**

AT&T/Intermedia/WorldCom's Position:     Yes. In the LERG, the industry document relied upon by all carriers for the routing of calls, has always indicated but a single rate center for Tampa. This is what the ALECs relied upon when they first obtained NXX codes for the provision of local telephone service, and there is no reasonable basis for changing from the single rate center.

**ISSUE 2:     How would multiple rate centers impact the numbering resources in the Tampa Market Area?**

AT&T/Intermedia/WorldCom's Position:     The introduction of five geographic rate centers for Tampa would lead to the premature exhaust of the 813

NPA. Since the ALECs would have to obtain additional NXX codes to serve five rate centers instead of one. This is not in the best interest of the customers.

**ISSUE 3a: What effect will Verizon's changes to its Routing Database System (RDBS) and Business Rating Information Database System (BRIDS) have on other telecommunications carriers in the Tampa Market Area?**

AT&T/Intermedia/WorldCom's Position: Verizon's proposed changes would require the ALECs to reassign its existing NXX codes to one of the five geographic rate centers. In reassigning NXX codes, some customers will have to take telephone number changes. In addition, ALECs would have to obtain new NXX codes in order to serve the other rate centers.

**ISSUE 3b: What effect would one or more rate centers have on telecommunications carriers in the Tampa Market Area?**

AT&T/Intermedia/WorldCom's Position: One rate center has been in effect since before the beginning of local competition in Tampa, and would continue to be good for all carriers and their customers. Only in changing to five rate centers would the premature NPA exhaust, customer telephone number changes, and other routing and

customer service problems develop.

**ISSUE 4: Should a number pooling trial be implemented in the Tampa Metropolitan Statistical Area? If so, when should the number pooling trial begin?**

AT&T/Intermedia/WorldCom's Position: A number pooling trial would be appropriate for the Tampa area if the national pooling process is unable to commence by year's end. Given the current pooling trials implementation schedule for Florida, the earliest a new trial could start would be late November 2001 (60 days after the last currently schedule trial for the Ft. Pierce MSA).

**ISSUE 5: What other number conservation measures, if any, should the Commission order in the Tampa Market Area? If so,**

**a) When should these measures be implemented?**

AT&T/Intermedia/WorldCom's Position: The best number conservation measure would be to retain the single rate center for Tampa.

**b) How should the cost recovery be established?**

AT&T/Intermedia/WorldCom's Position: Cost recovery for any new number conservation measures should be addressed in Docket No. 981444-TP.

**ISSUE 6: Should Verizon be ordered to implement rate center consolidation in the Tampa Market Area? If so,**

**a) How many rate centers should be consolidated? and if so, how should it be**

**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?**

AT&T/Intermedia/WorldCom's Position: If the Commission retains the single Tampa rate center as is in the LERG, Verizon may need to undertake internal rate center consolidation. Verizon should be directed to present a plan to the Commission for such approval and any other appropriate actions.

**ISSUE 7: 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?**

AT&T/Intermedia/WorldCom's Position: Yes, to both questions. Notwithstanding Verizon's tariff, there has been only one rate center in Tampa. The problems Verizon has identified are internal to its operations, so the appropriate resolution would be for Verizon to update its tariff. If this presents new problems for Verizon, then it should submit a proposal to the Commission.

## **F. PENDING MOTIONS**

AT&T, Intermedia, and WorldCom do not have any currently pending motions.

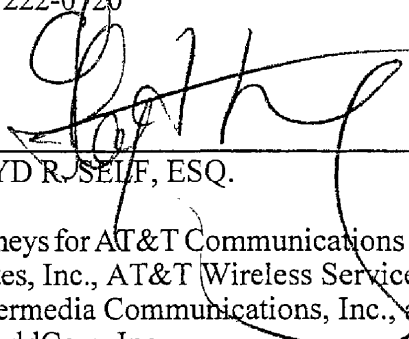
**G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH**

AT&T, Intermedia, and WorldCom know of no requirements that cannot be complied with.

Dated this 9th day of March, 2001.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of AT&T, Intermedia, and WorldCom's Joint Prehearing Statement in Docket 010102-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 9th day of March, 2001.

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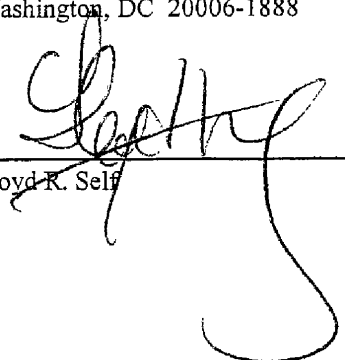
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