

**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  
Filed: March 9, 2001

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**TIME WARNER TELECOM OF FLORIDA, L.P.'S  
PREHEARING STATEMENT**

**TIME WARNER TELECOM OF FLORIDA, L.P. ("TWTC"),** pursuant to Order No.

PSC-01-0380-PCO-TP, submits the following Prehearing Statement:

**A. APPEARANCES**

**PETER M. DUNBAR, ESQ.**  
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**KAREN M. CAMECHIS, ESQ.**  
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**B. WITNESSES:**

Time Warner filed the direct and rebuttal testimony of Craig Tystad, Director of Operations Planning, Time Warner Telecom, and intends to call Mr. Tystad to offer testimony on all issues.

**C. EXHIBITS:**

Mr. Tystad is sponsoring Exhibit CT-1, which is Mr. Tystad's summary of qualifications.

**D. STATEMENT OF BASIC POSITION:**

Verizon should not be allowed to expand from one to five rate centers in the Tampa market area, and should be required to undo the changes made prior to August 15, 2000. TWTC believes

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that customers and other telecommunications carriers in the area will be significantly impacted by Verizon's changes in the rate center structure, including impacts on local and toll calling scopes, reciprocal compensation obligations, number portability, customer billing issues, call termination issues, the applicability of access charges on certain calls, as well as premature exhaustion of the 813 area code.

**E. STATEMENT OF 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?**

**POSITION:** Yes, the Tampa Market Area should be considered one rate center to prevent premature exhaust of the 813 NPA, and to facilitate future numbering resource optimization efforts. TWTC believes that customers and other telecommunications carriers in the area will be significantly impacted by Verizon's changes in the rate center structure, including impacts on local and toll calling scopes, reciprocal compensation obligations, number portability, customer billing issues, call termination issues, the applicability of access charges on certain calls, as well as premature exhaustion of the 813 area code.

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

**POSITION:** Currently, TWTC has 4 NXX's that serve the entire Tampa area. In order for TWTC to serve customers in the five rate centers designated by Verizon, TWTC would be required to designate the codes we currently have to the rate center covering the area where the predominate number of our customers physically reside. TWTC would then have to request initial codes in the other four rate centers in order to bring customers into alignment with Verizon's rate centers, and to allow customers to participate in porting. As a result, customers may be forced to take a number change to a new area code.

This would be the case with each of the approximately 32 ALEC's in the Tampa area. Each ALEC would be required to request a new NXX from NANPA for four additional rate centers. This instantly increases the amount

of assigned NXX's to 128, and could contribute to the premature exhaust of the 813 NPA.

**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?**

**POSITION:** Terminating calling plans from outside the Tampa area may disadvantage TWTC. For example, a terminating calling plan from the New Port Richey rate center into the Tampa area must be defined by Verizon for six different rate centers: Tampa, Tampa Central, Tampa South, Tampa North, Tampa East, and Tampa West. The Tampa rate center may be designated as a toll call from New Port Richey, whereas all other rate centers may be designated as a local call from New Port Richey. TWTC would have no control over the determination of whether the call is toll or local.

Having more than one rate center will require ALECS to utilize additional numbering resources which will, in turn, require customers of ALECs to change their phone numbers, putting ALECs at a competitive disadvantage. The porting rules state that porting cannot take place outside the rate center. Therefore, if a TWTC customer in the "Tampa" rate center wants to port to Verizon in the Tampa Central rate center, the TWTC customer would be forced to take a number change since the rate center designations do not match. This would also be the same if a Verizon customer ported to TWTC. Rate center designations must match in order to follow porting rules.

TWTC believes that customers and other telecommunications carriers in the area will be significantly impacted by Verizon's changes in the rate center structure, including impacts on local and toll calling scopes, reciprocal compensation obligations, number portability, customer billing issues, call termination issues, the applicability of access charges on certain calls, as well as premature exhaustion of the 813 area code.

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

**POSITION:** Having more than one rate center will require ALECs to utilize additional numbering resources which will, in turn, require customers of ALECs to change their phone numbers, putting ALECs at a competitive disadvantage. Additionally, porting rules state that porting cannot take place outside the rate

center. Therefore, if a TWTC customer in the “Tampa” rate center wants to port to Verizon in the Tampa Central rate center, the TWTC customer would be forced to take a number change since the rate center designations do not match. This would also be the same if a Verizon customer ported to TWTC. Rate center designations must match in order to follow porting rules.

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

**POSITION:** Yes, and the trial should be begin July 1, 2001. Number pooling mandates a separate number pool for each rate center. In the Tampa area, there would be six separate number pools, one for each rate center. The problem with this situation is that the ALECs, of which there are approximately 32, would donate and participate in one number pool for the “Tampa” rate center. However, Verizon would donate to themselves and be the only service provider to participate in the other five rate center pools, since the ALEC’s do not have numbers designated for the five Verizon rate centers. This process defeats the purpose of number pooling as an optimization method within the 813 NPA.

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

**POSITION:** Although the situation in Tampa actually involves the *expansion* of rate centers from one to five, not rate center consolidation, rate center consolidation is a conservation measure that should be ordered for the Tampa market area.

**ISSUE 5a: When should these measures be implemented?**

**POSITION:** Rate center consolidation should be implemented immediately.

**ISSUE 5b: How should the cost recovery be established?**

**POSITION:** Each carrier should absorb the costs of implementing rate center consolidation.

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

**POSITION:** Yes.

**ISSUE 6a: If so, how many rate centers should be consolidated? and if so, how should it be implemented?**

**POSITION:** There should be one rate center for the Tampa area.

**ISSUE 6b: If so, when should the rate center consolidation be effective?**

**POSITION:** Rate center consolidation should be ordered immediately with completion as soon as practicable.

**ISSUE 6c: Should Verizon be allowed to recover its costs upon consolidation of its rate centers in the Tampa Market Area? If so, how?**

**POSITION:** As stated above, all carriers, including Verizon, should absorb the costs of implementing rate center consolidation in Tampa.

**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?**

**POSITION:** Yes, and Verizon should be required to file a revised tariff reflecting one rate center for the Tampa market area. Implementation of the proposed modifications to the RDBS and the BRIDS will result in premature exhaustion of the 813 NPA. If the Commission does not take immediate action to cease further updates to the RDBS and the BRIDS, all ALECs in the Tampa area will be required to obtain NXX codes in all five Tampa rate centers, effective May 1, 2001. TWTC believes that customers and other telecommunications carriers in the area will be significantly impacted by Verizon's changes in the rate center structure, including impacts on local and toll calling scopes, reciprocal compensation obligations, number portability, customer billing issues, call termination issues, the applicability of access charges on certain calls, as well as premature exhaustion of the 813 area code.

**F. PENDING STIPULATIONS:**

None.

**G. PENDING MOTIONS OR OTHER MATTERS:**

None.

**H. REQUESTS OR CLAIMS FOR CONFIDENTIALITY:**

None.

**I. REQUIREMENTS IN THE ORDER ESTABLISHING PROCEDURE WITH WHICH  
TIME WARNER CAN NOT COMPLY:**

None.

**J. DECISIONS OF FCC OR COURTS THAT MAY IMPACT PROCEEDING:**

**FCC Order 99-249**

**RESPECTFULLY SUBMITTED** this 9<sup>th</sup> day of March 2001.

**TIME WARNER TELECOM OF FLORIDA, L.P.**

  
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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 010102**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **Time Warner Telecom of Florida, L.P.'s Prehearing Statement** has been served by U.S. Mail on this 9th day of March, 2001, to the following parties of record:

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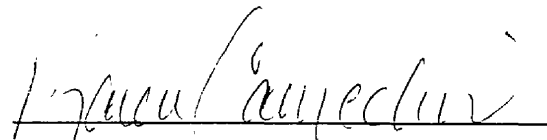
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