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RECORDS AND
REPORTING

March 9, 2001

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

Re: Docket No. 010102-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Prehearing Statement. A diskette in Word format is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck,
Deputy Public Counsel

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 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

CITIZENS' PREHEARING STATEMENT

The Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, file this prehearing statement as required by the order establishing procedure, order no. PSC-01-0380-PCO-TP issued February 14, 2001, and an Amendatory Order PSC-01-0380A-PCO-TP issued February 21, 2001.

Witnesses and Exhibits

Citizens have not sponsored a witness in this proceeding and have no exhibits to identify at this time.

Basic Position

For the purpose of ALECs utilizing numbering resources, Verizon should treat the Tampa Market Area as one rate center.

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: The Tampa Market Area should be one rate center for the ALECs, as it has been for past years.

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

Position: Requiring the ALEC's to change the procedure which has been used for past years would have an adverse impact on numbering resources in the Tampa Market Area.

Issue 3:

a) 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: No position at this time.

b) What effect would one or more rate centers have on telecommunications carriers in the Tampa Market Area?

Position: No position at this time.

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: A number pooling trial in the Tampa MSA should be implemented within six months of the Commission's decision in this proceeding.

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?

b) How should the cost recovery be established?

Position: No position at this time on issue a. With respect to issue b, Verizon already recovers its costs of providing telecommunications services through price cap regulation, and its rates cannot be increased except as provided by section 364.051, Florida Statutes. No additional charges should be allowed.

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?

Position: No position at this time with respect to issues a and b. With respect to issue c, Verizon already recovers its costs of providing telecommunications services through price cap regulation, and its rates cannot be increased except as provided by section 364.051, Florida Statutes. No additional charges should be allowed.

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: Verizon should treat the Tampa Market Area as one rate center for the purpose of ALECs utilizing numbering resources.

Stipulated Issues

There are no stipulated issues.

Pending Motions and Other Matters

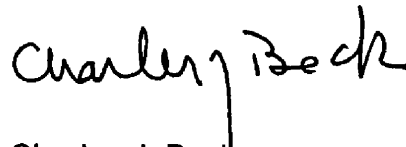
Citizens have no pending motions or other matters.

Requirements of Prehearing Order

Citizens believe we have complied with all requirements of the Prehearing Order.

Respectfully submitted,

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Fla. Bar. No. 73622



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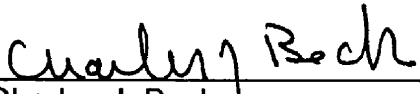
Attorneys for the Citizens
of Florida

NO. 010102-TP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 2nd day of March, 2001.


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