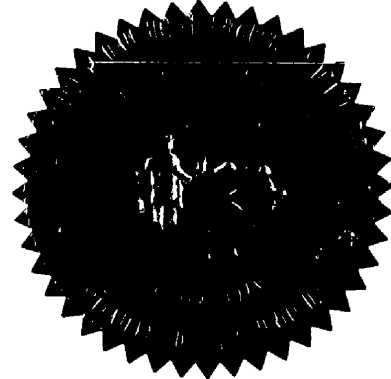


**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 010102-TP**

**In the Matter of**

**INVESTIGATION OF PROPOSED  
UPDATES TO THE ROUTING DATA  
BASE SYSTEM (RDBS) AND  
BUSINESS RATING INPUT DATA-  
BASE SYSTEM (BRIDS) AFFECTING  
THE TAMPA TELECOMMUNI-  
CATIONS CARRIERS.**



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THE WORDPERFECT VERSION OF THE TRANSCRIPT  
DOES NOT CONTAIN PREFILED TESTIMONY.**

**VOLUME 2  
PAGES 200 THROUGH 314**

**PROCEEDINGS: HEARING**

**BEFORE: COMMISSIONER J. TERRY DEASON  
COMMISSIONER BRAULIO L. BAEZ  
COMMISSIONER MICHAEL A. PALECKI**

**DATE: Tuesday, March 27, 2001**

**TIME: Commenced at 9:30 a.m.  
Concluded at 4:00 p.m.**

**PLACE: Betty Easley Conference Center  
Room 148  
4075 Esplanade Way  
Tallahassee, Florida**

**REPORTED BY: JANE FAUROT, RPR  
FPSC Division of Records & Reporting  
Chief, Bureau of Reporting**

**APPEARANCES: (As heretofore noted.)**

DOCUMENT NUMBER-DATE

04105 APR-30

FPSC-RECORDS/REPORTING

**I N D E X****WITNESSES**

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3		
4	<b>NAME:</b>	<b>PAGE NO.</b>
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13	<b>Direct Examination by Mr. Self</b>	<b>230</b>
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**EXHIBITS**

<b>NUMBER:</b>	<b>ID.</b>	<b>ADMTD.</b>
<b>11 JDJ-1 through JDJ-3</b>	<b>232</b>	<b>273</b>
<b>12 CT-1</b>	<b>275</b>	<b>309</b>
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**PROCEEDINGS**

(Transcript continues in sequence from Volume 1.)

**MR. SELF:** Thank you, Mr. Chairman. Intermedia would call Kelly Faul to the stand, please.

**KELLY FAUL**

was called as a witness on behalf of Intermedia Communications, Inc., and, having been duly sworn, testified as follows:

**DIRECT EXAMINATION**

**BY MR. SELF:**

**Q** Can you please state your name and business address for the record?

**A** My name is Kelly Faul and my business address is One Intermedia Way, Tampa, Florida 33647.

**Q** And by whom are you employed and in what capacity?

**A** I am employed by Intermedia Communications, Inc. as Senior Regulatory Manager, Industry Policy Department.

**Q** Did you cause to be prepared and filed direct testimony dated February 21st, 2001, consisting of eight pages?

**A** Yes, I did.

**Q** And did you also have prepared and filed rebuttal testimony dated March 5th, 2001, consisting of four pages?

1           **A     Yes.**

2           **Q     Do you have any changes or corrections to this**  
3 **testimony?**

4           **A     No, I don't.**

5           **Q     If I asked you the same questions today, would**  
6 **your answers be the same?**

7           **A     Yes, they would.**

8                   **MR. SELF: Mr. Chairman, I would ask that Ms.**  
9 **Faul's direct and rebuttal testimony be inserted in the**  
10 **record as though read.**

11                   **COMMISSIONER DEASON: Without objection it shall**  
12 **be so inserted.**

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1       **INTRODUCTION**

2       **Q.     PLEASE STATE YOUR FULL NAME, POSITION, AND BUSINESS**  
3       **ADDRESS.**

4       A.     My name is Kelly Faul. I am employed by Intermedia Communications  
5       Inc. as Senior Regulatory Manager, Industry Policy Department. My  
6       business address is One Intermedia Way, Tampa, Florida, 33647.

7       **Q.     PLEASE DESCRIBE YOUR PRESENT RESPONSIBILITIES,**  
8       **WORK EXPERIENCE, AND EDUCATIONAL BACKGROUND.**

9       A.     As Senior Regulatory Manager I am responsible for the regulatory  
10      activity of Intermedia in a number of areas including numbering,  
11      reciprocal compensation, and access charges. I am also responsible for  
12      various regulatory reporting and compliance issues. I have been employed  
13      by Intermedia since January 2000. Prior to that time I was employed by  
14      MCI WorldCom and before that MCI. From 1997 to 2000, I was  
15      employed by MCI WorldCom as a Senior Staff Member in its NPA  
16      Resource Management group where I represented MCI WorldCom at  
17      industry meetings and in regulatory proceeding dealing with area code  
18      relief and various numbering issues. From 1994 to 1997, I was Tariff  
19      Manager in its Business Markets segment responsible for federal and state  
20      tariff filings. From 1984 to 1994, I held various positions in MCI's Office  
21      of General Counsel in the area of litigation support. I have a Masters of  
22      Business Administration in Management from Virginia Tech and a  
23      Bachelor of Science in Business Administration from Wheeling Jesuit

1 University.

2 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY**  
3 **COMMISSIONS?**

4 A. Yes. I have testified in various area code and numbering proceedings in  
5 Florida, Colorado, New Hampshire, and Connecticut.

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

7 A. The purpose of my testimony is to provide Intermedia's recommendation  
8 to the Florida Public Service Commission ("PSC") regarding the rate  
9 center structure in the 813 NPA (Tampa area). I will also describe how  
10 changes to the rate center structure and to NPA-NXX assignments and  
11 allocations will impact Intermedia and its customers .

12

### 13 **RATE CENTERS AND THEIR PURPOSE**

14 **Q. WHAT IS A RATE CENTER AND WHAT IS ITS PURPOSE?**

15 A. A rate center is a specifically defined geographic area assigned a vertical  
16 and horizontal coordinate ("V&H coordinate"). The purpose of the V&H  
17 coordinate is that it is one point that identifies that geographic location for  
18 rating and routing of calls on the public switched telephone network.

19 **Q. HOW ARE RATE CENTERS USED IN THE RATING AND**  
20 **ROUTING OF CALLS?**

21 A. Central office codes, also known as NXXs, are assigned to a specific rate  
22 center. Carriers then assign telephone numbers to customers based on the  
23 physical location associated with the geographic boundary of the rate

1 center. The customer's rate center will determine its local calling area. It  
2 will also determine how long distance calls are rated.

3 **Q. HOW HAS INTERMEDIA HISTORICALLY BEEN REQUESTING**  
4 **NPA-NXXS FROM THE NORTH AMERICAN NUMBERING PLAN**  
5 **ADMINISTRATOR ("NANPA").**

6 A. It has been requesting, and has been subsequently assigned, NPA-NXX  
7 codes in the Tampa rate center. It then assigns customers who are physically  
8 located in the Tampa rate center telephone numbers from those NPA-NXXs.  
9 It is this Tampa rate center which Verizon is proposing be split into five new  
10 rate centers.

11 **Q. WHERE ARE INTERMEDIA'S CUSTOMERS LOCATED?**

12 A. Intermedia has customers located throughout the entire Tampa rate center;  
13 our customers are physically located in each of the five new rate centers  
14 which Verizon is trying to designate. Intermedia has one rate center tariffed  
15 for Tampa.

16  
17 **SCENARIO ONE: VERIZON'S FIVE RATE CENTER STRUCTURE**

18 **Q. WHAT CHANGE IN THE CURRENT RATE CENTER STRUCTURE**  
19 **AND ALLOCATION OF NPA-NXXS IS VERIZON PROPOSING?**

20 A. Currently, the Local Exchange Routing Guide ("LERG") has one rate center  
21 identified for the Tampa area, "Tampa", used by the majority of ALECs.  
22 Verizon has changed their structure and split the Tampa rate center into five  
23 new rate centers: Tampa Central, Tampa East, Tampa West, Tampa North,



1 and Tampa South effective 2/01/2001. Some ALECs also made this change.

2 **Q. WHAT EFFECT WILL VERIZON'S CHANGES HAVE ON OTHER**  
3 **TELECOMMUNICATIONS CARRIERS.**

4 A. Carriers using the one rate center structure, will be required to request  
5 additional NPA-NXXs for the new rate centers in order to ensure that  
6 customers have service. Intermedia has identified customers in all five of the  
7 proposed Verizon rate centers. If ALECs are required to match the new  
8 Verizon rate center structure, there will be a run on 813-NXXs and the area  
9 code will exhaust prematurely.

10 **Q. WHAT EFFECT WILL VERIZON'S CHANGES HAVE ON**  
11 **CUSTOMERS OF THE ALTERNATIVE LOCAL EXCHANGE**  
12 **CARRIERS ("ALECS")?**

13 A. While not all customers will see an impact from this change, there are  
14 customers who will be required to take telephone number changes.

15 **Q. WHY WOULD SOME CUSTOMERS REQUIRE A TELEPHONE**  
16 **NUMBER CHANGE?**

17 A. If a carrier has been assigning telephone numbers from an NPA-NXX in an  
18 area physically covered by two or more of these five new rate center, only  
19 one of those rate centers will now be allowed to be associated to that NPA-  
20 NXX. Some customers may now be located in a different rate center. The  
21 new rate center will be assigned a new NPA-NXX and the customer will  
22 need to be assigned a new telephone number associated with that new NPA-  
23 NXX. Intermedia has customers who will be affected in this way.

1       **Q.     WHAT AFFECTS WILL A NEW TELEPHONE NUMBERS HAVE**  
2       **CUSTOMERS?**

3       A.     Customers will need to notify all family, friends, business associates,  
4       vendors, etc. of their new telephone number. Customers will incur costs to  
5       change their stationary, business cards, and advertising; any preprogrammed  
6       equipment with the old telephone number will need to be reprogrammed.

7       **Q.     WILL THERE BE ANY CUSTOMER IMPACTS IN THE FUTURE?**

8       A.     Yes, customers who have ported numbers from Verizon that were originally  
9       assigned to an NPA-NXX associated with a rate center in which they are no  
10      longer located, will be required to take a telephone number change if they go  
11      back to a carrier who has different rate center structure and the customer is  
12      no longer located in that original rate center.

13      **Q.     HOW WOULD THIS SCENARIO AFFECT A POSSIBLE FUTURE**  
14      **FLORIDA PSC ORDER FOR RATE CENTER CONSOLIDATION**  
15      **IN THE 813 NPA AREA?**

16      A.     This change is in effect a reverse rate center consolidation. It achieves the  
17      opposite effect of conserving numbers. It is conceivable that the  
18      Commission could, in the future, order the five new rate centers to be  
19      consolidated back into the old familiar Tampa rate center. This would  
20      ultimately be an inefficient use of carriers' resources; the work to split the  
21      rate center, then to consolidate them back to the original structure would  
22      seem to be a wasteful use of the limited resources available to carriers.

23

1       **SCENARIO TWO: VERIZON USES FIVE RATE CENTERS, OTHER**  
2       **CARRIERS USE ONE RATE CENTER**

3       **Q.     IF THE PSC ALLOWS VERIZON TO CONTINUE WITH ITS**  
4       **CHANGES TO RBDS AND BRIDS AND TO CREATE FIVE RATE**  
5       **CENTERS AND ALSO ALLOW ALECS TO MAINTAIN THEIR**  
6       **ONE RATE CENTERS STRUCTURE, WILL THIS CREATE ANY**  
7       **IMPACTS?**

8       A.     Two troubling impacts have been identified in this scenario; one deals with  
9       pooling and the other with local number portability (“LNP”)?

10      **Q.     HOW WOULD THIS SCENARIO IMPACT POOLING?**

11      A.     In a pooling environment, each rate center requires its own pool of thousand  
12      number blocks. In the case of six rate centers: Tampa, Tampa Central,  
13      Tampa East, Tampa West, Tampa North, and Tampa South; each rate center  
14      will require a pool. A total of six pools would be required. And carriers will  
15      only be able to donate and receive thousand number blocks from the pool  
16      associated with the rate center(s) it uses.

17      **Q.     WHAT IMPACTS HAVE BEEN IDENTIFIED WITH LNP AND THE**  
18      **TWO RATE CENTER STRUCTURE SCENARIO?**

19      A.     There will be customer impacts. Customers who are assigned a number  
20      from an NPA-NXX in which Verizon has identified as one of the sub-rate  
21      centers, who have ported their number and are now in the Tampa rate center  
22      will only be able to port numbers within the Tampa rate center. These  
23      customers will not be able to choose Verizon or any other carrier which uses

1 the five rate center structure, and port their numbers, they will have to take a  
2 number change.

3

4 **SCENARIO THREE: ALL LECs HAVE ONE RATE CENTER**

5 **Q. WHAT IMPACTS HAVE YOU IDENTIFIED FOR CUSTOMERS IF**  
6 **THE ONE RATE CENTER IS MAINTAINED AND NOT SPLIT**  
7 **INTO FIVE RATE CENTERS?**

8 A. Intermedia has not identified any impacts to its customers at this time.

9 **Q. WHAT IMPACTS HAVE YOU IDENTIFIED FOR ALECS IF THE**  
10 **ONE RATE CENTER IS MAINTAINED AND NOT SPLIT INTO**  
11 **FIVE RATE CENTERS?**

12 A. Intermedia has not identified any impacts to ALECs at this time.

13

14 **RECOMMENDATION**

15 **Q. WHAT RECOMMENDATION DO YOU MAKE TO THIS**  
16 **COMMISSION IN REGARDS THE PROPOSED CHANGES TO THE**  
17 **RATE CENTER STRUCTURE IN TAMPA?**

18 A. Carriers have been assigned NPA-NXXs in the Tampa rate center for many  
19 years now. To change the structure now, would not only affect the industry  
20 and carriers, but also be costly to some of the telephone customers in the  
21 area. This change will be costly to Intermedia and affect its ability to  
22 provide seamless, high-quality services to its customers. This Commission  
23 should maintain the one rate center structure. The one rate center structure

1 will minimize customer impacts, carrier impacts, and premature exhaust of  
2 the area code. At the very least, this Commission should not order any LECs  
3 to make changes to its current rate center structure.

4 **CONCLUSION**

5 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

6 A. Yes, it does.

1       **INTRODUCTION**

2       **Q.     PLEASE STATE YOUR NAME.**

3       A.     My name is Kelly Faul.

4       **Q.     ARE YOU THE SAME KELLY FAUL WHO FILED TESTIMONY IN**  
5       **THIS CASE ON FEBRUARY 21, 2001?**

6       A.     Yes.

7       **Q.     WHAT IS THE PURPOSE OF YOUR PRESENT TESTIMONY?**

8       A.     The purpose of my testimony is to provide comments on the impacts of rate  
9       center boundary realignment described by Verizon in its testimony of  
10      Beverly Y. Menard.

11      **Q.     WHAT IS THE GIST OF MS. MENARD'S TESTIMONY?**

12      A.     Ms. Menard provides testimony in support of Verizon's change in the  
13      Business Rating Information Database System (BRIDS) and the Routing  
14      Database System (RDBS). She states that in essence this is how Verizon has  
15      been operating for at least 30 years, although the exact time that these rate  
16      centers were implemented is unknown. She contends that this five rate  
17      centers structure – Tampa Central, Tampa East, Tampa West, Tampa North,  
18      and Tampa South – is necessary to eliminate manual practices that have been  
19      in place for years.

20

21               **TODAY'S RATE CENTER STRUCTURES**

22      **Q.     WHAT RATE CENTER CONFIGURATION DOES INTERMEDIA**  
23      **USE TODAY?**

1 A. Intermedia uses one rate center, the Tampa rate center.

2 **Q. HOW HAVE ALTERNATIVE LOCAL EXCHANGE CARRIERS**  
3 **(ALECS) INCLUDING INTERMEDIA BEEN USING NXXS?**

4 A. The ALECs (including Intermedia) since their inception, have been receiving  
5 codes in the industry recognized Tampa rate center and assigning and porting  
6 numbers within the geographic boundaries defined for the Tampa rate center.  
7 This rate center has defined boundaries which carriers use to assign  
8 telephone numbers to its customers within that geographic boundary. Even  
9 though the Verizon code administrator – who was the code administrator  
10 until June 1998 -- may have made the assumption that the ALECs' NXXs  
11 were to be assigned to the Tampa Central rate center, ALECs used the Tampa  
12 rate center designation to assign numbers throughout the entire area cover by  
13 the Tampa rate center. The Tampa rate center was the industry recognized  
14 rate centers in the Local Exchange Routing Guide (LERG), BRIDS, and  
15 RIDB; and continues to be for most ALECs.

16 **Q. DO YOU AGREE WITH MS. MENARD'S STATEMENT ON PAGE**  
17 **7, LINES 9 THROUGH 12 THAT THE FIVE RATE CENTERS ARE**  
18 **REQUIRED SO THAT VERIZON CAN CORRECTLY RATE ITS**  
19 **END USERS' CALLS?**

20 A. Ms. Menard contends that Verizon cannot properly rate calls from its end  
21 users unless the ALECs use the five rate centers designation. Verizon today  
22 is billing its customers' calls to ALEC customers based on the ALECs' one  
23 rate center environment. Unless Verizon has been billing its customers

1           incorrectly during the past number of years, this statement cannot be true.

2                       While Verizon contends that five rate centers have existed for over  
3           30 years, it must be noted that for the ALECs one Tampa rate center has  
4           always existed.

5           **Q.   CURRENTLY, ONE OF VERIZON'S RECOMMENDATIONS IS**  
6           **THAT THE 813-NXXS WHICH ARE ALREADY ASSIGNED TO**  
7           **ALECS AND THEIR CUSTOMERS THROUGHOUT THE TAMPA**  
8           **RATE CENTER BE GRANDFATHERED. GIVEN THIS FACT, WILL**  
9           **THE PROBLEMS IDENTIFIED BY VERIZON WITH RATING AND**  
10          **ROUTING CONTINUE TO EXIST?**

11          **A.**   Yes, for those grandfathered 813-NXXs, the rating and routing problems  
12          identified by Verizon will continue. Verizon states in its testimony that  
13          Verizon cannot properly rate calls from its end users unless the ALECs use  
14          the five rate centers designations. Verizon today is billing its customers for  
15          calls to ALEC customers in an ALEC one rate center environment today.  
16          This will continue for those grandfathered customers. Additionally, this  
17          could have a severe impacts on local number portability (LNP).

18          **Q.   CAN YOU EXPLAIN WHAT IMPACTS THIS WILL HAVE ON**  
19          **LOCAL NUMBER PORTABILITY (LNP)?**

20          **A.**   Customers are allowed to port their numbers within a rate center. For  
21          example, take a customer who has numbers assigned by an ALEC in the  
22          Tampa rate center and is physically located in, let's say, what would now  
23          become Tampa East. If that customer wishes to port to Verizon, its numbers



1 would not be physically located in the Tampa East rate center, if it is  
2 assumed that all currently assigned NXXs are assigned to the Tampa Central  
3 rate center (as is assumed in Ms. Menard's testimony on Page 10, line 12  
4 through 13). The result is that this customer would require a new telephone  
5 number if it wanted to port to Verizon or any other carrier using the five rate  
6 center structure.

7

8 **CONCLUSION**

9 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

10 **A. Yes, it does.**

1 **BY MR. SELF:**

2 **Q And do you have any exhibits?**

3 **A I don't believe so.**

4 **Q Okay. Do you have a brief summary of your**  
5 **testimony?**

6 **A Yes, I do.**

7 **Q Can you please give that now?**

8 **A I am here today to ask the Florida PSC to**  
9 **carefully consider the ramifications of any changes to the**  
10 **rate center structure in the City of Tampa. The carriers**  
11 **minus Verizon have been using a one rate center structure**  
12 **for Tampa since the inception of competition in Florida**  
13 **and from an industry standpoint further back in history.**  
14 **Intermedia since it began service in Tampa has requested**  
15 **and received 813 NXXs for the Tampa rate center. All NXX**  
16 **codes received by Intermedia were for the Tampa rate**  
17 **center.**

18 **Intermedia requested its first code from GTE,**  
19 **now Verizon, in 1995. Intermedia continues to receive**  
20 **codes from Verizon and later NPAs for the Tampa rate**  
21 **center. It was our understanding that the designations**  
22 **east, west, north, south, and central were billing tiers**  
23 **used by Verizon. Intermedia has assigned numbers to**  
24 **customers throughout the entire Tampa rate center.**

25 **Customers who are physically located in what**

1 Verizon is trying to designate as Tampa east, west,  
2 et cetera, share numbers from NXXs assigned to the entire  
3 Tampa rate center. Therefore, Intermedia has customers  
4 sharing specific NXXs throughout the entire area. The  
5 industry databases, including the LERG, have identified  
6 Tampa as the correct rate center. Carriers are assigned  
7 numbers based on these central office codes, they use  
8 those numbers to assign -- those NXXs to assign numbers to  
9 their carriers, and they are based on the physical  
10 location associated with the geographic boundary of the  
11 rate center which Intermedia and the rest of the industry  
12 other than Verizon has used as the entire Tampa rate  
13 center.

14           It is our understanding that Verizon may have  
15 historically done internal manual processes to identify  
16 its NXXs for billing purposes, the rest of the industry  
17 did not use these processes, we used the Tampa rate  
18 center. Intermedia's basic concern with this is that we  
19 will have customers who will have to take telephone number  
20 changes. We do have customers in all five of the areas  
21 that Verizon has identified, the east, west, north, south,  
22 and central.

23           Not only will our customers be impacted now, but  
24 later if customers -- if grandfathering goes into place,  
25 customers who move who want to change carriers later may

1 have to take telephone numbers at that point.

2 Basically, we would just like to say that  
3 Intermedia will have impacts from a network standpoint on  
4 its network if this happens and that our customers could  
5 be severely impacted. Thank you.

6 MR. SELF: The witness is available for cross  
7 examination.

8 COMMISSIONER DEASON: Mr. Beck.

9 MR. BECK: Thank you, Commissioner Deason.

10 CROSS EXAMINATION

11 BY MR. BECK:

12 Q Good afternoon, Ms. Faul.

13 A Good afternoon.

14 Q Do your customers in the different rate centers  
15 have the same calling scope or do they vary according to  
16 the rate center of Verizon?

17 A All of our customers within the Tampa rate  
18 center have the same calling scope.

19 Q How does that compare to the local calling  
20 scopes of Verizon, if you know?

21 A I believe that they – their local calling area  
22 may not be quite as large, but I'm not exceedingly  
23 familiar with their calling area.

24 MR. BECK: Thank you. That's all I have.

25 COMMISSIONER DEASON: Ms. Caswell.

**CROSS EXAMINATION**

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**BY MS. CASWELL:**

**Q I want to refer to something you said in your opening statement. I'm not sure I heard it correctly. I think you said that Intermedia was under the impression that Tampa north, Tampa south, Tampa east, and Tampa west were billing centers rather than rate centers, is that what you said?**

**A I think the term that we had heard from GTE back then was billing tiers.**

**Q You heard that from GTE, that term billing tiers?**

**A Our people who are getting codes, the code administrators for our company and our LEC relations people, yes. That they were billing tiers that Verizon had set up, but that the rate center was Tampa.**

**Q Do you know who specifically used that term, billing tiers?**

**A I have a document here from GTE that we received that shows that.**

**Q Does it say billing tiers?**

**A Yes, it does. They are called tiers in the -- it's a diagram of all the NXXs.**

**Q So it would show the rate centers as the five Tampa rate centers, is that right?**

1           **A**     **Our code administrators when they were**  
2 **requesting this understood these to be internal tiers set**  
3 **up by Verizon, but that the rate center was Tampa.**

4           **Q**     **What is the date on that document?**

5           **A**     **1996.**

6           **Q**     **Do you want to share that with us?**

7           **A**     **Sure.**

8                   **MR. SELF:** **Mr. Chairman, unfortunately at the**  
9 **moment we just have two copies of this. We can make**  
10 **copies or deal with it however Ms. Caswell or the**  
11 **Commission wishes.**

12                   **COMMISSIONER DEASON:** **Well, we will just see**  
13 **what Ms. Caswell chooses to do with it.**

14 **BY MS. CASWELL:**

15           **Q**     **Ms. Faul, I just looked through this quickly,**  
16 **but I didn't see the words billing tier anywhere on here,**  
17 **am I wrong?**

18           **A**     **Tier is what is listed on here, on this**  
19 **document. Our code administrators, our numbering people**  
20 **were led to believe by Verizon that these were used for**  
21 **billing purposes and they referred to them as billing**  
22 **tiers.**

23           **Q**     **Well, I don't know that I disagree that they are**  
24 **used for billing purposes, but did anyone ever tell you**  
25 **those were not rate centers?**

1           **A**     **No. But we were told that the rate center**  
2 **encompassed those five tiers.**

3           **Q**     **You were specifically told that there was one**  
4 **rate center that encompassed those five tiers despite the**  
5 **fact that there is five rate centers listed on this**  
6 **document, is that what your testimony is?**

7           **A**     **We were led to believe -- if you look at this,**  
8 **the rate centers from the rest of them have solid lines**  
9 **around them where it is identified as rate centers, and**  
10 **that when you have the area that shows the north, central,**  
11 **south, and west there are dotted lines separating those**  
12 **different areas.**

13          **Q**     **Did you personally have any discussion with**  
14 **anybody at GTE back in 1996 about this chart?**

15          **A**     **Personally, no.**

16          **Q**     **So that in 1996 you knew at least that there**  
17 **were five designations that had the word Tampa in them,**  
18 **Tampa north, Tampa central, Tampa east, Tampa west, and**  
19 **Tampa south, correct?**

20          **A**     **Correct.**

21          **Q**     **Let's take a look at ICI's price list that it**  
22 **has filed with the Commission.**

23                   **MR. SELF: Ms. Caswell, if I could request that**  
24 **you identify which page it is, not the entire price list.**

25                   **MS. CASWELL: Yes. Let's see if there is a page**

1 number on here. Well, it's Section 3. It's 3.2, product  
2 descriptions continued, original Page Number 11.4. And  
3 the specific section that I'm looking at is 3.2.2.G it  
4 looks like, and the subheading is Number 2, local calling  
5 areas.

6 A Okay.

7 Q And I'm going to ask you to look at that first  
8 paragraph. Can you read the last sentence in that first  
9 paragraph starting with "the Intermedia."

10 A "The Intermedia local calling area matches  
11 existing ILEC local calling areas."

12 Q What does that mean to you that Intermedia  
13 matches Verizon's local calling areas?

14 A That we would have the same local calling areas  
15 for this product, which is a PRI product.

16 Q Right. And would you expect those local calling  
17 areas to be described in Verizon's tariffs?

18 A I would expect that.

19 Q So that someone at Intermedia must have looked  
20 at Verizon's tariffs to know what its local calling areas  
21 were before it filed this price list, would that be true?

22 A It may have.

23 Q How many customers does ICI have in Verizon's  
24 tariffed rate centers outside of the Tampa central area,  
25 meaning north, south, east, and west?



1           **A     That I'm not sure of.**

2           **Q     Do you have any idea if the majority are in**  
3 **Verizon's Tampa central area?**

4           **A     Yes, they are.**

5           **Q     Do you think that if number pooling were**  
6 **instituted, would Intermedia need more than one thousands**  
7 **block in each of those four areas?**

8           **A     Probably.**

9           **Q     They would probably need more than one thousands**  
10 **block?**

11          **A     In each of the five areas, yes, or other four**  
12 **areas.**

13          **Q     In each of those areas it would need more than**  
14 **one thousands block?**

15          **A     Correct.**

16          **Q     Meaning that Intermedia has more than 1,000**  
17 **customers in each?**

18          **A     Telephone numbers.**

19          **Q     More than 1,000 telephone numbers in each of**  
20 **those four areas?**

21          **A     In at least – that I can think of off the top**  
22 **of my head, at least one of those areas would require more**  
23 **than 1,000 numbers.**

24          **Q     At least one. What about the other three?**

25          **A     One of the other ones may, I'm not sure. In two**

1 of the other areas a thousands block would probably today  
2 serve our customers there.

3 Q You are aware, aren't you, that Verizon has  
4 proposed to grandfather the 813 NXXs that CLECs have  
5 already assigned, is that right?

6 A My understanding is that they would grandfather  
7 the customers in those NXXs.

8 Q Right. And if that proposal is accepted, those  
9 customers won't need to take number changes, will they?

10 A That is correct.

11 Q And you are aware also of Verizon's number  
12 pooling recommendation, correct?

13 A Correct.

14 Q And Verizon hasn't proposed the six pools that  
15 you seem to assume in your testimony, has it?

16 A I was assuming that with the six pool scenario  
17 that there would be one Tampa rate center and then there  
18 would be the five others, the Tampa east, north,  
19 cetera, pools, so there would be two overlaying pools.

20 Q Okay. And that's not Verizon's proposal, is it?

21 A I'm not sure what Verizon's proposal is.

22 Q Do you believe that Verizon has proposed pooling  
23 in a Tampa area?

24 A I don't believe so, but I'm not sure how you  
25 would deal with the grandfathered customers.

1           **Q     Would Verizon's proposal affect ICI's ability to**  
2 **provide high quality services to its customers?**

3           **A     Well, if we had customers who had to take**  
4 **telephone number changes, we think that would be a**  
5 **detriment to the customers. And also we would have**  
6 **probably some network changes to make, and I'm not sure**  
7 **what would happen with that.**

8           **Q     But didn't we just establish that customers**  
9 **wouldn't have to take telephone number changes under**  
10 **Verizon's proposal?**

11          **A     If the customers were grandfathered.**

12          **Q     Right.**

13               **MS. CASWELL: Okay. That's all I've got, thank**  
14 **you.**

15               **COMMISSIONER DEASON: Staff.**

16                       **CROSS EXAMINATION**

17 **BY MR. FORDHAM:**

18           **Q     Ms. Faul, in your direct testimony which was**  
19 **filed, and, again, today you have said that on occasions**  
20 **you have requested and been routinely assigned codes in**  
21 **the Tampa rate center.**

22                       **Now, on any of those occasions has the numbering**  
23 **administrator ever questioned you or discussed your**  
24 **request to determine a specific Tampa rate center?**

25           **A     Very early on when we were initially getting**

1 codes back in the mid-'90s, Intermedia talked with Verizon  
2 and we were told we could get one code for the  
3 Hillsborough County area to serve that area.

4 Q You were told that by the numbering  
5 administrator?

6 A From Verizon, GTE at that point, yes.

7 Q Okay. On Page 5 of your prefiled direct  
8 testimony, Lines 8 through 12, you discuss customers who  
9 have ported numbers from Verizon that were originally  
10 assigned to an NXX associated with a rate center in which  
11 they are no longer located will be required to take a  
12 phone number change if they go back to a carrier who has a  
13 different rate center structure and the customer is no  
14 longer located in that original rate center. That is  
15 briefly the essence of those lines in your testimony.

16 Would you view that as a violation of FCC number  
17 portability requirements?

18 A The FCC states that you have to be able to port  
19 within your rate center. If through some actions that  
20 happen while you are a customer, the rate center structure  
21 changes and your rate center boundaries change, I don't  
22 think it would be a violation. I'm not an attorney.

23 Q Okay. In your opinion is number porting limited  
24 to rate center boundaries?

25 A Today it is.

1           **Q**     **On Page 8 of your prefiled direct testimony,**  
2 **Lines 2 and 3, you state that the Commission should not**  
3 **order any LEC to make changes to its current rate center**  
4 **structure. Now, let me ask you this. Since Verizon has**  
5 **already made changes to reflect the five Tampa rate**  
6 **centers, should they be allowed to maintain the five Tampa**  
7 **rate centers?**

8           **A**     **Well, I think at this point what -- we had --**  
9 **they had gone -- the ALECs had been meeting, and we**  
10 **thought that at one point that the Commission had told**  
11 **Verizon that if they wanted to go forward with this that**  
12 **they would have to come to the Commission and open up a**  
13 **docket, I believe, in order to discuss this. We thought**  
14 **that that was where we stood and we were maintaining the**  
15 **status quo. Because the change in a rate center doesn't**  
16 **affect just one carrier or a couple of carriers, it**  
17 **affects the whole industry, and that there are other**  
18 **parties that are impacted by this change.**

19                   **And I think most of the ALECs had been working**  
20 **under this one Tampa rate center scenario. According to**  
21 **the LERG and all the other industry carriers within North**  
22 **America, there was one rate center, Tampa rate center.**  
23 **And that this was a change that Verizon had made recently**  
24 **according to all the industry databases that were out**  
25 **there, and that they had gone ahead and done this. It**

1 sort of blindsided us actually that they had actually  
2 implemented this. Does that answer your question?

3 Q May I take that as a no, they should not be  
4 allowed to maintain it?

5 A You can do that, yes.

6 Q We were discussing, or you were discussing with  
7 Ms. Caswell a few minutes ago the concept of pooling. Are  
8 you aware that one of the criteria for initiation of a  
9 number pooling trial is that an area code must be in  
10 jeopardy?

11 A No, I can't say that I recall that right now.

12 Q Are you aware of whether the 813 area code is in  
13 jeopardy?

14 A I didn't believe it is.

15 MR. FORDHAM: No further questions.

16 COMMISSIONER DEASON: Commissioners. Redirect.

17 MR. SELF: No redirect.

18 COMMISSIONER DEASON: And no exhibits?

19 MR. SELF: That is correct.

20 COMMISSIONER DEASON: Okay. Ms. Faul, you may  
21 be excused.

22 THE WITNESS: Thank you.

23 COMMISSIONER DEASON: We may take the next  
24 witness.

25 MR. SELF: Thank you, Mr. Chairman. WorldCom

1 would call Denise Thomas to the stand, please.

2 While she is getting ready, Mr. Chairman, as the  
3 prehearing order points out, WorldCom originally filed  
4 direct and rebuttal testimony for Mr. James Joeger.  
5 Subsequent to the filing of that testimony, because of  
6 some other changes it was decided that Ms. Thomas would be  
7 the witness for WorldCom in this proceeding.

8 And, in fact, we refiled on March 13th the  
9 testimony removing all of the references and discussions  
10 of Mr. Joeger, and instead inserting the relevant  
11 biography and job description for Ms. Thomas. Otherwise  
12 the testimony was exactly the same substantively on the  
13 issues.

14 And so the testimony that we will be working  
15 from is that refiled testimony that was accomplished on  
16 March 13th, and I believe all the parties have a copy of  
17 that.

18 **DENISE THOMAS**

19 was called as a witness on behalf of MCI WorldCom  
20 Communications, Inc., and, having been duly sworn,  
21 testified as follows:

22 **DIRECT EXAMINATION**

23 **BY MR. SELF:**

24 **Q Can you please give us your name and business**  
25 **address for the record?**

1           **A**     **My name is Denise Thomas. My business address**  
2 **is 2678 Bishop Drive, San Ramon, California, Suite 200.**

3           **Q**     **And by whom are you employed and in what**  
4 **capacity?**

5           **A**     **I am employed by WorldCom, Incorporated, and I**  
6 **am the manager in the external numbering policy group.**

7           **Q**     **Did you cause to be prepared and filed**  
8 **testimony, direct testimony consisting of 15 pages?**

9           **A**     **That is correct.**

10          **Q**     **And did you cause to be prepared and filed**  
11 **rebuttal testimony consisting of three pages?**

12          **A**     **That is correct.**

13          **Q**     **Do you have any changes or corrections to this**  
14 **testimony?**

15          **A**     **No, I do not.**

16          **Q**     **If I asked you the same questions today, would**  
17 **your answers be the same?**

18          **A**     **Yes, they would.**

19                   **MR. SELF: Mr. Chairman, I would ask that**  
20 **Ms. Thomas' direct and rebuttal testimony be inserted in**  
21 **the record as though read.**

22                   **COMMISSIONER DEASON: Without objection it shall**  
23 **be so inserted.**

24 **BY MR. SELF:**

25          **Q**     **And I believe also associated with your direct**



1 testimony you have three exhibits which are identified in  
2 that testimony as JDJ-1 through JDJ-3, is that correct?

3 A That is correct.

4 Q Do you have any changes or corrections to these  
5 exhibits?

6 A No, I do not.

7 MR. SELF: Mr. Chairman, could we please  
8 identify these prefiled exhibits which are attached to her  
9 direct testimony, I guess that would be Exhibit 11?

10 COMMISSIONER DEASON: Yes, Composite Exhibit 11.

11 MR. SELF: Thank you.

12 (Exhibit 11 marked for identification.)

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

2       A.     My name is Denise V. Thomas.   My business address is 2678 Bishop  
3       Drive, San Ramon, California, suite 200.

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

5       A.     I am employed by WorldCom, Inc. (“WorldCom”). I am a manager in the  
6       External Numbering Policy group 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 my Bachelors from St. Mary’s College in Moraga, California. I  
11      began my career in telecommunications in 1981 with Pacific Bell. I  
12      worked in various departments during my seventeen year tenure with  
13      Pacific: Operator Services, Regulatory, Human Resources and Billing. In  
14      December of 1997, I accepted a position with WorldCom as a Network  
15      Development Manager. My responsibility was to ensure the successful,  
16      timely implementation of LNP in the top 100 MSAs per the FCC  
17      Requirement. Upon the successful implementation of LNP I elected to  
18      move to the External Numbering Policy Group.

19      **Q.     HAVE YOU PREVIOUSLY APPEARED IN PROCEEDINGS  
20      BEFORE THIS COMMISSION?**

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

1 industry planning and implementation efforts to introduce Local Number  
2 Portability within the Florida Metropolitan Statistical Areas (MSAs). In  
3 addition, I have coordinated WorldCom's positions for number pooling  
4 and area code relief 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  
8 (LERG) classification of the rate areas that describe the Tampa  
9 metropolitan area. I will comment on whether it is advisable to make this  
10 change and if not what 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  
15 by Telecordia,. The tariff identifies five separate rate centers for the  
16 Tampa area: Tampa Central, Tampa North, Tampa South, Tampa East,  
17 and Tampa West. For purposes of my testimony, I will refer to these five  
18 Tampa rate centers generally as the Tampa geographic rate centers.  
19 However, in the LERG there is only one Tampa rate center, which has  
20 been designated as "Tampa." For purposes of my testimony I will refer to  
21 the single market area-wide Tampa rate center as the generic or universal  
22 Tampa rate center.

23 When Verizon was the code administrator it was able to somehow identify

1 and place NXX codes in the appropriate Tampa geographic rate centers.  
2 This was apparently fine in a world where there was a monopoly local  
3 telephone service provider. However, when the NXX Code  
4 Administrator's functions were transferred to NeuStar as the NANPA and  
5 local competition was permitted, new entrants were assigned codes to the  
6 universal Tampa rate center. Verizon's proposal is to require all carriers  
7 with codes in the Tampa universal rate center to assign the codes to one of  
8 the five geographic rate centers.

9 **Q. WHEN WERE THE SERVICE PROVIDERS FIRST NOTIFIED OF**  
10 **THIS SITUATION?**

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

1       **Q.    WHAT ACTIONS HAVE BEEN TAKEN BY THE SERVICE**  
2           **PROVIDERS AFFECTED BY VERIZON'S PROPOSED**  
3           **CHANGES?**

4       A.    Our first action was to attempt to better understand the meaning of  
5           Verizon's proposed changes and the consequences to our customers and  
6           companies. Knowing that changes in the LERG take 66 days or more to  
7           become effective, on October 25, 2000, a number of the carriers prepared  
8           and sent to Mr. Walter D'Haeseleer a letter identifying some of the  
9           potential problems and the need to gather additional information. A copy  
10          of this letter is attached to my testimony as Exhibit JDJ-1. In view of the  
11          minimum time to complete LERG changes and our concerns for the  
12          potential adverse consequences of Verizon's proposed changes, we  
13          requested that Verizon's proposed changes at least be delayed until May 1,  
14          2001. We sent a copy of this letter to Verizon as well as to several of the  
15          ALECs.

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

17       A.    The Commission Staff had apparently already engaged Verizon on this  
18           issue, receiving a letter from Verizon dated October 27, 2000, with Mr.  
19           D'Haeseleer writing on November 2, 2000, seeking additional  
20           information. Also on November 13, 2000, the Staff noticed a workshop  
21           on this issue, which many attended by telephone. On the basis of all of  
22           these events, Mr. D'Haeseleer sent a letter to Verizon on November 17,  
23           2000, requesting that Verizon's proposed changes be filed with the

1 Commission in the form of a petition and docketed. Mr. D'Haeseleer's  
2 letter is attached as Exhibit JDJ-2.

3 **Q. WHAT HAPPENED NEXT?**

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

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

10 A. No. But in early January of this year, in a conversation with Telecordia,  
11 we were advised that Verizon was moving forward with making the  
12 changes to the LERG to reassign its NXX codes to the five geographic  
13 rate centers.

14 **Q. WHAT DID THE ALECS DO IN RESPONSE TO THIS**  
15 **INFORMATION?**

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

22 **Q. HOW DID THE COMMISSION RESPOND TO THIS JANUARY**  
23 **LETTER?**

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

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

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

12 **Q. SHOULD THE TAMPA MARKET AREA BE CONSIDERED ONE**  
13 **RATE CENTER?**

14 A. Yes. From the beginning of when local competition began, ALECs  
15 conducted business under the assumption of one rate area for the Tampa  
16 Market area. When WorldCom received its numbering resources for the  
17 Tampa area, NANPA issued codes for a single rate center to cover the  
18 entire Tampa metropolitan area. WorldCom has built its business and  
19 developed its local calling scope with the knowledge that the Tampa area  
20 was a single rate area. Changing the number of rate areas to essentially  
21 expand the quantities of rate areas, is contrary to effective numbering  
22 policy and the efficient use of numbering resources. Therefore,  
23 WorldCom believes that one rate center should continue to be associated

1 with the Tampa Market area.

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

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

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

17 A. The impact multiple rate centers will have on numbering resources in  
18 Tampa will vary from service provider to service provider. However, one  
19 common detriment to the industry as a whole and also working against the  
20 Commission's efforts in achieving a comprehensive and sound numbering  
21 policy is that adding or expanding the Tampa rate centers to five or six  
22 will serve to prematurely exhaust the 813 NPA. This is due to the fact that  
23 numbering resources today are assigned to service providers on a rate area



1 basis. This paradigm has existed for many years and will not change in  
2 this matter or without further regulatory action. Indeed, the FCC has  
3 acknowledged the rate area problem in its Further Notice of Proposed  
4 Rulemaking in the Number Resource Optimization docket, fully realizing  
5 that as long as service providers are required to maintain the current  
6 paradigm of obtaining entire NXX codes (or numbering blocks where  
7 number pooling is in place), service providers will continue to acquire  
8 more numbers than may be needed. Rate Center Consolidation is one  
9 solution that can be explored now by moving back permanently to a single  
10 rate area for Tampa. Consequently, until the rate area paradigm is  
11 changed, adding rate areas as Verizon proposes will accelerate the rate at  
12 which NXX codes are consumed in the 813 NPA and thus, speed up the  
13 exhaust date for this NPA.

14 **Q. CAN YOU FURTHER EXPLAIN THE POTENTIAL NPA**  
15 **EXHAUST PROBLEM IN TAMPA AS IT APPLIES TO**  
16 **COMPETITIVE CARRIERS?**

17 A. Yes. At the present time the competitive service providers have  
18 numbering resources presuming one rate center for Tampa. This was  
19 described to the competitive carriers in the LERG which carriers use when  
20 planning entry into a market to determine how many resources to request  
21 from the numbering administrator. Under Verizon's proposed changes,  
22 the Tampa market area would change from the current single rate area to  
23 five rate areas. Further, those service providers who either desire to mimic

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

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

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

1       **Q.    IN WORLDCOM'S OPINION, WHAT IS THE PREFERRED**  
2       **COURSE OF ACTION?**

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

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

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

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

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

23      A.    No it is not.

1       **Q.    ARE OTHER CARRIERS AFFECTED IN THE SAME WAY AS**  
2       **WORLD.COM?**

3       A.    WorldCom cannot speak for other service providers. However, we  
4       generally know that the customer impacts I previously described would  
5       affect all customers and that the carriers would experience provisioning,  
6       number administration, and billing system changes that would need to be  
7       made to reflect the inconsistent rate area changes.

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

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

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

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

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

21      A.    If there are six Tampa rate centers five geographic and one generic, only  
22      Verizon and any other carriers that chose to utilize the geographic rate  
23      centers could pool in the respective five geographic rate centers.

1           Assuming the ALECs did not assign their NXX codes to the five  
2           geographic rate centers, then Verizon would basically be pooling numbers  
3           with itself. On the other hand, the sixth pool would involve only those  
4           carriers with NXX codes in the generic Tampa rate center, and they would  
5           pool only among themselves.

6           **Q.    SHOULD A NUMBER POOLING TRIAL BE IMPLEMENTED IN**  
7           **THE TAMPA METROPOLITAN STATISTICAL AREA? IF SO,**  
8           **WHEN SHOULD THE NUMBER POOLING TRIAL BEGIN?**

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

17           **Q.    WHAT OTHER NUMBER CONSERVATION MEASURES**  
18           **SHOULD THE COMMISSION ORDER IN THE TAMPA MARKET**  
19           **AREA? IF ANY, WHEN SHOULD THESE MEASURES BE**  
20           **IMPLEMENTED, AND HOW SHOULD THE COST RECOVERY**  
21           **BE ESTABLISHED?**

22           A.    The most immediate measure would be a number pooling trial for NPA  
23           813. The trial should be implemented after Verizon reverses the changes

1 to the LERG and there is only one universal Tampa rate center. In  
2 regards to cost recovery, WorldCom echoes the FCC which states that all  
3 shared industry cost should be recovered through a competitively neutral  
4 cost recovery mechanism. Furthermore, WorldCom has no opinion  
5 regarding a carrier methodology for cost recovery of carrier-specific costs  
6 provided the implemented methodology does not affect other carriers.

7 **Q. SHOULD VERIZON BE ORDERED TO IMPLEMENT RATE**  
8 **CENTER CONSOLIDATION IN THE TAMPA MARKET AREA?**  
9 **IF SO,**

10 **a. HOW MANY RATE CENTERS SHOULD BE**  
11 **IMPLEMENTED?**

12 **b. WHEN SHOULD THE RATE CENTER CONSOLIDATION**  
13 **BE EFFECTIVE?**

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

17 A. First, we must establish if Rate Center Consolidation is the appropriate  
18 definition for the action that should occur. Prior to February 1, 2001 all  
19 codes in the Tampa Market Area were designated in the LERG under the  
20 rate center heading of "Tampa." The ALEC carriers built their marketing  
21 and service offerings on the basis of the Tampa MSA having one rate  
22 center. This has been in effect for years, including the time that  
23 competitive carriers have operated in Tampa. WorldCom believes that the

1 one rate center system prior to the Verizon changes should be effective  
2 immediately. If the Commission deems this is only possible through rate  
3 center consolidation, WorldCom request that such consolidation be  
4 undertaken. As to cost recovery for rate center consolidation or any other  
5 related implementation issues, Verizon should outline them to the  
6 Commission so they can be investigated.

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

12 A. Yes, Verizon should be required to undo changes made prior to February  
13 1, 2001 to the LERG and the associated systems. In addition, the  
14 Commission should order Verizon to file a revised tariff reflecting one  
15 Tampa Rate Center.

16 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

17 A. WorldCom's position is that the most effective path forward is to describe  
18 the Tampa metropolitan area as a single rate area. This step in  
19 WorldCom's view is necessary to alleviate impacts that competitive  
20 service providers, albeit some, would incur if required to conform to the  
21 five rate areas that Verizon seeks to codify. Even if there are no impacts  
22 to competitive carriers and their existing customers brought about by rate  
23 center boundary violations should Verizon be allowed to proceed, the

1           resultant impacts to the life of the 813 NPA would bring about a less  
2           efficient and undesirable numbering practice at the same time this  
3           commission seeks to prolong the lives of NPAs.

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

5           A.    Yes.



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

2       A.     My name is Denise V. Thomas. My business address is 2678 Bishop Drive,  
3             Suite 200, San Ramon, CA 94583.

4       **Q.     ARE YOU THE SAME DENISE THOMAS WHO FILED DIRECT**  
5             **TESTIMONY IN THIS CASE?**

6       A.     Yes, I am.

7       **Q.     WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8       A.     My rebuttal testimony responds to the testimony of the Verizon Florida, Inc.  
9             ("Verizon") witness, Ms. Beverly Menard.

10      **Q.     WHAT IS YOUR FIRST ISSUE WITH RESPECT TO MS. MENARD'S**  
11            **DIRECT TESTIMONY?**

12      A.     My first problem with her testimony is the assumption that the five rate  
13            centers proposed by Verizon, and put into effect on February 1, 2001, are  
14            somehow the correct structure for Tampa because the Verizon tariff identifies  
15            five rate centers. What Verizon does or has done for its own internal  
16            functionality or operations is not the issue. Rather, from the beginning of  
17            local competition, the Local Exchange Routing Guide (LERG) has defined  
18            the rate areas that describe the Tampa metropolitan area. The LERG has  
19            always defined but a single Tampa rate center, identified simply as Tampa.

20      **Q.     BUT WHAT ABOUT HER STATEMENTS THAT THE ALEC NXX**  
21            **CODES HAVE REALLY BEEN ASSIGNED TO THE TAMPA**  
22            **CENTRAL RATE CENTER?**

1 A. Again, what Verizon has done to route or handle calls is not the issue. All  
2 of the ALECs have entered the market, made their marketing plans, and  
3 configured their networks on the basis of a single Tampa rate center. Even  
4 Mr. Foley, testifying on behalf of NeuStar in this case, makes it clear that  
5 there is, or at least was, prior to February 1, 2001, only one Tampa rate  
6 center. The fact that we have a neutral, independent code administrator that  
7 is the current keeper of the LERG which reflects but the single Tampa rate  
8 center should only confirm this basic network fact.

9 **Q. DO YOU AGREE WITH MS. MENARD'S RECOMMENDATION AT**  
10 **PAGE 10 OF HER TESTIMONY TO GRANDFATHER THE**  
11 **EXISTING ALEC NXX CODES?**

12 A. No. As I and the other ALEC witnesses discussed in our direct testimonies,  
13 this creates potential numbering porting and pooling issues. More  
14 importantly, it will require that for new customers additional NXX codes be  
15 obtained. As Mr. Foley has testified, there is a very real potential of the  
16 premature exhaust of the 813 NPA.

17 **Q. DO YOU AGREE WITH MS. MENARD'S TESTIMONY**  
18 **REGARDING THE POTENTIAL ISSUES FALLING OUT OF RATE**  
19 **CENTER CONSOLIDATION FOR THE TAMPA AREA?**

20 A. I am not an attorney, so I am not qualified to address the legal issues raised  
21 by her testimony. However, if you accept her basic premise, it may follow  
22 that the legal or financial problems she has identified may result. But as I

1 have testified, she starts from the wrong position. The reality is not five rate  
2 centers, but the one Tampa rate center that has existed in the LERG and  
3 which all the ALECs and the rest of the world have always responded to  
4 when routing calls. What we are seeking is simply a return to what has  
5 always existed.

6 **Q. WHAT ABOUT THE OTHER OPERATIONAL ISSUES MS.**  
7 **MENARD HAS DESCRIBED BEGINNING AT PAGE 16 OF HER**  
8 **TESTIMONY IN CONNECTION WITH “CONSOLIDATING”**  
9 **TAMPA RATE CENTERS?**

10 A. I do not have access to all of the underlying operational matters she has  
11 identified. However, as her testimony makes clear, and the entire conduct of  
12 this entire issue also demonstrates, additional investigation and fact gathering  
13 is required. In the final analysis, I do not believe that this information would  
14 change the LERG reality of one Tampa rate center, but it may help Verizon  
15 transition its internal systems to that reality.

16 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

17 A. Yes.

1 **BY MR. SELF:**

2 **Q Do you have a brief summary of your testimony?**

3 **A Yes, I do.**

4 **Q Can you please give that now?**

5 **A The purpose of my visit today is to reiterate**  
6 **the fact that the Tampa rate center needs to be returned**  
7 **to the status quo, i.e., Tampa represented as one rate**  
8 **center in the LERG. The one rate center Tampa has been in**  
9 **effect as one rate center since before the beginning of**  
10 **local competition in Tampa. WorldCom's position is that**  
11 **the most effective path for it is to allow the Tampa**  
12 **metropolitan area to remain a single rate center.**

13 **It is WorldCom's view that this is necessary to**  
14 **alleviate impacts that competitive service providers would**  
15 **incur if required to conform to the five new rate areas**  
16 **that Verizon seeks to codify. Should Verizon be allowed**  
17 **to proceed with this change, the resultant impacts to the**  
18 **life of the 813 NPA would bring about a less efficient and**  
19 **undesirable numbering practice at the same time the**  
20 **Commission seeks to prolong the lives of NPAs in Florida.**

21 **Today the 813 NPA has a projected exhaust date**  
22 **of fourth quarter 2006. If Verizon is allowed to change**  
23 **the one Tampa rate center into the five new rate centers,**  
24 **the life of the 813 NPA and its projected exhaust date of**  
25 **the 813 NPA will be greatly compromised. Therefore,**

1 **WorldCom again reiterates the need for the Tampa**  
2 **metropolitan area to be represented as it has been since**  
3 **before the beginning of local competition as Tampa rate**  
4 **center in the LERG. This would continue to be good for**  
5 **all carriers and their customers.**

6 **MR. SELF: Thank you. The witness is available**  
7 **for cross.**

8 **COMMISSIONER DEASON: Mr. Beck. Ms. Caswell.**

9 **CROSS EXAMINATION**

10 **BY MS. CASWELL:**

11 **Q Good afternoon, Ms. Thomas. I'm Kim Caswell**  
12 **with Verizon.**

13 **Your testimony acknowledges that there are five**  
14 **separate tariffed rate centers for Tampa. And as I**  
15 **understand your testimony, you are recommending that those**  
16 **five rate centers be consolidated into just one Tampa rate**  
17 **center, is that correct?**

18 **A I don't believe we are recommending**  
19 **consolidation, we are recommending that it be reverted**  
20 **back to the status quo before the changes by Verizon of**  
21 **February '1st, 2001.**

22 **Q I think this is just a matter of semantics, but**  
23 **do you recognize that Verizon has five tariffed Tampa rate**  
24 **centers?**

25 **A I would say that we recognize that Verizon's**

1 tariff indicates five rate centers. But the LERG  
2 indicates one, which is Tampa, which is what we have based  
3 our numbering and our routing off of.

4 Q And you are recommending that Verizon's tariff  
5 should only reflect one rate center, which is Tampa,  
6 correct?

7 A I am recommending that Tampa remain as it was,  
8 which would be Tampa in the LERG, with regards to  
9 Verizon's tariff.

10 Q You are recommending a tariff change, correct?

11 A I would think a tariff change probably would be  
12 easier to do than to require the industry to change what  
13 has been status quo.

14 Q And changing the tariff would also mean that the  
15 rate centers themselves would be consolidated, correct?

16 A I'm not sure about that question.

17 Q Well, I mean, on Page 13 of your direct  
18 testimony, for instance, you talk about cost-recovery for  
19 rate center consolidation. So I'm assuming you are  
20 recommending rate center consolidation. Would that be an  
21 incorrect assumption? Because if you are talking about  
22 cost-recovery, you have got to be talking about rate  
23 center consolidation.

24 A I think, and I can only somewhat assume here on  
25 what Mr. Joeger was answering with regard to rate center

1 consolidation. If the Commission were to consider rate  
2 center consolidation as opposed to just reverting back to  
3 the original Tampa rate center, if Verizon were required  
4 to do so, then, yes, then it would be a cost-recovery  
5 issue.

6 Q Would you agree that there is no Tampa rate  
7 center in the tariffs today, there is no rate center  
8 labeled simply Tampa?

9 A In the tariffs, in Verizon's tariff?

10 Q Correct.

11 A I have not looked at the actual tariff. I just  
12 know what I have been told about the tariff that reflects  
13 the five that has been stated by Verizon.

14 Q So when you wrote the tariff identifies five  
15 separate rate centers for the Tampa area, Tampa central,  
16 Tampa north, Tampa south, Tampa east, and Tampa west, what  
17 did you base that information on?

18 A That information was based off of information  
19 that was referred to Mr. Joeger from Fred Gamble  
20 (phonetic), who was the individual that actually was  
21 handling this prior to myself. And I'm sure it was based  
22 off of what he got from the actual tariff copies.

23 Q And your statement seems to preclude that there  
24 is any simply Tampa rate center in the tariff, correct?

25 A Identified as just Tampa, not Tampa central,

1 yes, I would say.

2 Q Thank you.

3 A I guess I would have to comment again, though,  
4 since we base everything off of the information out of the  
5 LERG where it is a Tampa rate center with regards to how  
6 our rating and routing and everything is structured, there  
7 would be a Tampa as far as we are concerned, just Tampa.

8 Q At Page 9, Line 2 of your direct testimony,  
9 Lines 1 to 2 you make reference to interconnection  
10 agreements that require ALECs to match Verizon's calling  
11 area. Do you have such an interconnection agreement that  
12 requires you to match our calling area?

13 A It would be an assumption on my part that we do  
14 because we have interconnection agreements. What it  
15 exactly states, I couldn't comment.

16 Q So are you telling me you don't know if the  
17 agreement requires you to match Verizon's local calling  
18 areas?

19 A No, I'm telling you I'm not sure how our  
20 interconnection agreement with Verizon reads, because I  
21 have not actually seen the interconnection agreement  
22 myself.

23 Q Then what did you base that statement on?

24 A Well, I think the general practice is when a  
25 service provider comes into market they generally match



1 the ILEC's rate centers.

2 Q Is that a requirement in the interconnection  
3 agreement or is that a business decision on the ALECs'  
4 part?

5 A I am not quite sure. My assumption would be  
6 that it is more than likely probably a decision because  
7 you don't want to deal with inconsistent rate centers.

8 Q So your assumption is that it is the ALECs'  
9 business decision, correct, rather than the  
10 interconnection agreement?

11 A A combination, yes.

12 Q No, I'm not asking you if it is a combination.  
13 Is it in the interconnection agreement or not?

14 A Is it actually in the agreement?

15 Q Yes, yes. Because it seems here you say, you  
16 refer to interconnection agreements that require ALECs to  
17 match Verizon's calling area. And what I want to ask you  
18 is if you have ever seen an interconnection agreement  
19 between Verizon and an ALEC that has that requirement?

20 A No, I have not actually seen an interconnection  
21 agreement.

22 Q In your direct testimony at Page 13, you say at  
23 Lines 20 through 22, the ALEC carriers built their  
24 marketing and service offerings on the basis of the Tampa  
25 MSA having one rate center. Does that mean that WorldCom

1 offers a local calling scope that includes all five of  
2 Verizon's tariffed rate centers?

3 A I cannot answer that question because I'm not  
4 familiar with that.

5 Q Do you know what WorldCom's local calling scopes  
6 are?

7 A No, I do not.

8 Q So you don't know if they match?

9 A If they match exactly, no, I do not.

10 Q In any event, WorldCom's local calling scopes  
11 won't be affected by the decision in this docket, will  
12 they? WorldCom has the right to determine what its  
13 calling scopes are, correct?

14 A I'm going to assume, yes, that they do have the  
15 right to determine what their calling scope is.

16 Q In your testimony you discuss number pooling,  
17 and you seem to assume there will be six pools, the five  
18 so-called geographic pools that are reflected in Verizon's  
19 tariffs and one pool for what you call the universal Tampa  
20 rate center. Verizon hasn't proposed any pool for the  
21 Tampa, so-called Tampa rate center, has it?

22 A I would assume that that assumption is based on  
23 the fact that if you were allowed to implement your five  
24 new rate centers and you were going to do grandfathering,  
25 well, then the grandfathering would encompass customers

1 within the Tampa rate center. So if you were going to do  
2 pooling, each rate center would have to have a pool.

3 Q But Verizon hasn't proposed having any pool for  
4 the Tampa rate center, because it doesn't have a tariff  
5 that corresponds to that pool, is that right? Verizon  
6 hasn't proposed that, correct?

7 A Not that I am aware of, that they have not  
8 proposed that, no. But they have proposed the  
9 grandfathering of customers keeping them within that  
10 particular rate center of Tampa. And if you are going to  
11 do pooling, you would have to allow those customers to  
12 pool, as well, so you would have to have a pool for the  
13 Tampa rate center.

14 Q I think you just said we had proposed  
15 grandfathering customers within the rate center of Tampa.  
16 There is no Tampa rate center in the tariff, correct?

17 A Okay. You have proposed grandfathering  
18 customers that the other ALECs have within their quote,  
19 unquote, Tampa rate center.

20 Q Which would be Tampa central, correct?

21 A I'm not sure if they have the same V and H  
22 coordinates as Tampa.

23 Q And that grandfathering would mean those  
24 customers would not have to change their telephone  
25 numbers, correct?

1           **A**     **That is not totally correct. Because if the**  
2 **customer desired to switch providers, ports from, say,**  
3 **WorldCom to Verizon, you would require them to take a**  
4 **number change because that NXX is going to be based off of**  
5 **what we consider to be the Tampa rate center. And if they**  
6 **were actually in what you consider to be Tampa east, you**  
7 **will require the customer to take a number change.**

8           **Q**     **And that situation is no different from any**  
9 **other where you would have a customer where portability**  
10 **would be occurring, say, from St. Pete to Tampa. That is**  
11 **no different from any other – any other rate center in**  
12 **the state, correct?**

13          **A**     **If the Tampa rate center were left at status**  
14 **quo, just Tampa, within that particular rate center the**  
15 **customer would be able to port no matter where they were**  
16 **located.**

17          **Q**     **Okay. But there is no Tampa rate center today**  
18 **in the tariffs, correct?**

19          **A**     **In your tariff? From what you say, yes, in your**  
20 **tariff.**

21          **Q**     **So – and under the FCC guidelines number**  
22 **porting can only occur within a rate center, correct?**

23          **A**     **Correct.**

24          **Q**     **So today we can't port between, say, Tampa**  
25 **central and Tampa east, or Tampa west, correct, under the**

1 **FCC's guidelines and the way the carriers have implemented**  
2 **their systems?**

3 **A If Tampa were left as is before the February 1st**  
4 **changes by Verizon, that customer would be able to port**  
5 **within the entire Tampa rate center, no matter which**  
6 **switch they were housed.**

7 **Q No. Okay. You recognize that there are five**  
8 **tariffed rate centers, correct?**

9 **A Verizon is implementing five new tariffed rate**  
10 **centers, correct.**

11 **Q No, there are five existing tariffed rate**  
12 **centers, correct? And you state that in your testimony,**  
13 **and I can tell you where –**

14 **A For your Verizon tariff you have five rate**  
15 **centers.**

16 **Q Correct. And under FCC guidelines it is**  
17 **permissible to port only within a rate center, correct?**

18 **A Correct.**

19 **Q And if there are five existing rate centers, a**  
20 **customer – carriers could port only within each of those**  
21 **five rate centers, correct, not between them?**

22 **A There is no porting between rate centers, that**  
23 **is correct.**

24 **Q Right. How many customers does WorldCom have in**  
25 **the areas corresponding to Verizon's Tampa north, Tampa**

1 south, Tampa east, and Tampa west tariffed rate centers?

2 A The exact number I do not have.

3 Q Do you have any kind of an estimate?

4 A It is my understanding that we are probably one  
5 of the larger ALECs within that community.

6 Q What do you mean by "that community"?

7 A Or within that particular Tampa rate center.

8 The number of customers I do not know.

9 Q Now, you are saying that particular rate center.

10 I have named four Tampa rate centers, and I'm asking you  
11 how many customers you have in each of those areas?

12 A Okay. I apologize because I keep thinking of it  
13 as just Tampa, which was the original one.

14 Q Right.

15 A I can't give you the exact number.

16 Q Can you give me a proportion?

17 A A proportion as to our customer base, how many I  
18 think are in each of the four?

19 Q Yep.

20 A No, because it would truly be a very big guess.

21 Q Would you agree at least that a majority of your  
22 customers are in what corresponds to -- what we think of  
23 as the Tampa central tariffed rate area?

24 A I think that might be a safe assumption.

25 Q In your rebuttal testimony at Page 3, Lines 12

1 and 13, you indicate that additional investigation and  
2 fact gathering is required with regard to the issues in  
3 this case. Can you tell us what additional information  
4 and fact gathering we would need to do before making a  
5 decision?

6 A I'm sorry, you're on Page 3?

7 Q Page 3 of your rebuttal testimony, Lines 12 and  
8 13.

9 A And, I'm sorry, I don't have a numbered copy of  
10 that. Is that the same question –

11 Q Well, let me just – we don't even need to look  
12 at your testimony. Do you believe that any information,  
13 any additional investigation or fact gathering is  
14 necessary before the Commission can make a decision in  
15 this case?

16 A I would think that probably before they make a  
17 decision as to whether or not to grant the five created  
18 rate centers as opposed to just the original Tampa, yes.

19 Q And what kind of information or facts would be  
20 necessary before they made that decision?

21 A I would think information regarding how the  
22 other ALECs would be affected by the proposed changes that  
23 Verizon has implemented within the LERG.

24 Q That's already in the record, isn't it?

25 A Probably some of it, but I think there is

1 additional comment.

2 Q What kind of additional things don't appear in  
3 the testimony that the Commission should know?

4 A I would say the majority of them probably are  
5 there with regards to customer impact, effect, and maybe  
6 some of the cost issues.

7 Q I'm sorry, did you say that they are there  
8 already or that they aren't there?

9 A I would say that the majority of them are there,  
10 but additional evidence or information could probably be  
11 gathered. To specifics, I'm not sure.

12 MS. CASWELL: That's all I've got. Thank you,  
13 Ms. Thomas.

14 COMMISSIONER DEASON: Staff.

15 CROSS EXAMINATION

16 BY MR. FORDHAM:

17 Q Ms. Faul, on Page 3, Lines 11 through 25 of your  
18 prefiled testimony, you stated that according to Verizon  
19 there is inconsistency between its tariff and the LERG.  
20 Now, my question is do you personally believe that there  
21 is inconsistency between Verizon's tariff and the LERG?

22 A If the question is do I believe that what they  
23 have written in their tariff does not match what is in the  
24 LERG, that would be true. What is written in their tariff  
25 on paper indicates Tampa north, south, east, central, and



1 west, whereas the LERG only indicates Tampa.

2 Q So basically you concur with Verizon that there  
3 is inconsistency?

4 A Correct, I do.

5 Q Also on Page 3 you state that WorldCom has  
6 received its numbering resources for the Tampa area and  
7 NANPA issued the codes for a single rate center to cover  
8 the entire metropolitan Tampa area.

9 Now, when you received those codes, did the code  
10 administrator ever discuss your request to determine which  
11 of the -- which of the Tampa areas the codes were issued  
12 for or should be issued for?

13 A No, they did not.

14 Q On Page 7 of your direct testimony, Lines 9  
15 through 20, you state that one option would be to allow  
16 Verizon to continue using five geographic rate centers.  
17 Would you just discuss briefly, please, identify the  
18 advantages and disadvantages of that scenario and its  
19 impact on carriers and customers?

20 A I would say that the advantage would be we would  
21 be able to resume business as usual before the  
22 February 1st change to the RDBS and BRIDS and the LERG.  
23 The possible disadvantage, if it truly is a disadvantage,  
24 is that whatever Verizon was doing behind the scenes when  
25 they were code administrator allowing only one rate center

1 to exist in the LERG they would have to continue to do.

2 Q Now, you also state that there is a second  
3 option and that is to require Verizon to undo or remove  
4 its changes to the LERG. In that scenario would you  
5 identify the advantages and disadvantages and its impact  
6 on the carriers and customers?

7 A I would say, again, that if they were to  
8 allow -- be allowed the second option, the ALECs would  
9 remain with the same benefit of being able to continue to  
10 have one Tampa rate center represented in the LERG and  
11 assign codes based upon that. And I am not totally sure  
12 as to what internal changes would have to be made within  
13 Verizon.

14 Q In the first part of this question, just to be  
15 sure that we understood that, the scenario would be if  
16 Verizon were allowed to continue using the five geographic  
17 rate centers, in answering that was that your  
18 understanding?

19 A No, it wasn't. I actually thought you said  
20 second. When I looked at the second one, I answered that  
21 question.

22 Q I'm going back to the first scenario there where  
23 I said that if Verizon were allowed to continue using five  
24 geographic rate centers, the advantages and disadvantages  
25 and impact?

1           **A     Right. And I did not answer that properly then.**  
2 **I was looking at the second option and answered based upon**  
3 **that one.**

4           **Q     Okay. Could you have another shot at the first**  
5 **scenario –**

6           **A     I would appreciate it.**

7           **Q     -- were they allowed to continue?**

8           **A     I would think that my answer to that would be**  
9 **the same as my answer to the third, which you haven't**  
10 **asked yet, but I will go ahead and answer. Which would be**  
11 **basically the ALECs will be required to change their**  
12 **existing and get new codes for the other rate centers**  
13 **where they do not have codes because they would still have**  
14 **customers that were in those particular rate centers that**  
15 **are now being described as either Tampa north, south,**  
16 **east, or west. So that particular customer would be**  
17 **forced – from an ALEC perspective, that particular**  
18 **customer would more than likely be forced to change.**

19                   **If they were grandfathered, they would be put in**  
20 **a situation where with regards to the porting it would not**  
21 **be as flexible for them, because eventually a number**  
22 **change would take place. The benefit to Verizon would be**  
23 **that they would have the five geographic rate centers that**  
24 **they have already put in the LERG after February 1st.**

25           **Q     Okay. Now, I think you have answered scenario**

1 two, and I'm going to surprise you and not ask you about  
2 scenario three. So let's change channels here.

3 On Page 10 of your testimony, Lines 4 through  
4 22, you state that WorldCom is affected by the creation of  
5 five rate centers, but WorldCom's local calling plan is  
6 not. Can you explain that seeming inconsistency?

7 A I would have to basically try to second-guess  
8 what Jim Joeger was thinking. I am under the assumption  
9 that if the WorldCom calling plan was extended to the  
10 point that it is not affected, the creation of the five  
11 additional rate centers would affect us with regards to, I  
12 guess, our customer base if there were a need for the  
13 customer to take customer changes.

14 Q But your local calling plan would not be  
15 affected?

16 A Correct. Because we are matching the  
17 incumbent's rate centers with regards to, I guess, the  
18 calling scope.

19 Q Okay. On Page 11, Line 25, and Page 12, Lines 1  
20 through 9, you state that a Tampa pooling trial should  
21 begin after Verizon reverses its changes in the LERG.  
22 Now, in your opinion, when should the LERG be changed?

23 A In my opinion, the LERG should be changed back  
24 to the original status quo as soon as possible.

25 Q And after -- were it to be changed back, how

1 long after that change should the pooling trial begin?

2 A I am somewhat familiar with the pooling that has  
3 already been or being investigated within the Florida  
4 area, so I would think after November, which is when I  
5 think it is Ft. Pierce MSA or one of the later MSAs is due  
6 to actually look into pooling. So after that time, after  
7 November of 2001. And that is based off of the  
8 requirements relative to the NRO, which the FCC basically  
9 states that pooling should be three NPAs per region per  
10 LATA as to not overburden the carriers within that are  
11 national.

12 Q In your opinion, Ms. Faul, could a pooling trial  
13 be implemented prior to the change in the LERG?

14 A Is it okay if I say I'm Mrs. Thomas?

15 Q I'm sorry, wrong witness. You're right.

16 A That's okay. I'm sorry, could you repeat the  
17 question?

18 Q I apologize for that. In your opinion, could a  
19 pooling trial be implemented prior to a change in the  
20 LERG?

21 A If a pooling trial were to be implemented prior  
22 to the LERG being converted back to just the Tampa rate  
23 center, it would require that there be six poolings, six  
24 areas being pooled, or six rate centers, because each rate  
25 center would have to have a pool of its own.

1           **Q**     **So I would take that as a no, that it could not**  
2 **be implemented prior to a change in the LERG?**

3           **A**     **It could be implemented, but it will require**  
4 **more administrative with regard to the pooling**  
5 **administrator because there would not be one pool, there**  
6 **would be several pools that would have to be stocked and**  
7 **implemented.**

8           **Q**     **Are you aware that one of the criteria for**  
9 **initiation of a number pooling trial is that the area code**  
10 **must be in jeopardy?**

11          **A**     **That is one of the three requirements in the**  
12 **FCC's NRO. But there are several states that have**  
13 **petitioned and gotten delegated authority and have gotten**  
14 **the ability to implement pooling trials without all three**  
15 **of the requirements being met.**

16          **Q**     **Are you aware of whether the Tampa area code is**  
17 **in jeopardy?**

18          **A**     **It's my understanding, I think, that it is not**  
19 **in jeopardy right now.**

20                   **MR. FORDHAM: No further questions.**

21                   **COMMISSIONER DEASON: Commissioners.**

22                   **COMMISSIONER PALECKI: I have just a few**  
23 **questions. If we get away from the additional**  
24 **administrative costs to your company that might be**  
25 **incurred if there were five separate areas, and just focus**

1 on the issue of existing customers, are you satisfied with  
2 the grandfathering clause or provision that Verizon has  
3 proposed?

4 **THE WITNESS:** I would first like to comment on  
5 the fact that the additional costs wouldn't be specific to  
6 my company. Pooling administrator costs would be divided  
7 amongst the industry, so it would be a shared cost. And,  
8 I'm sorry, your question was would I be satisfied with the  
9 grandfathering?

10 **COMMISSIONER PALECKI:** Yes. The grandfathering  
11 provision that has been suggested by Verizon, is that  
12 satisfactory with regard to the issue of existing  
13 customers?

14 **THE WITNESS:** If we are looking at the future  
15 ability of the customer to be flexible and mobile and to  
16 have a choice, which is what competition is about, I would  
17 say that it would not be fair. Because somewhere along  
18 the line, depending upon that customer's choice, if they  
19 choose to truly switch providers and port back to Verizon,  
20 there is going to be a requirement for that customer to  
21 eventually take a number change.

22 **COMMISSIONER BAEZ:** Now, see, that's what -- I'm  
23 sorry, Commissioner, I just have to jump in here. That is  
24 what has been bugging me all afternoon. From a practical  
25 standpoint it seems like the proposal actually locks your

1 customers in from a competitive standpoint.

2 THE WITNESS: Locks it into me as far as  
3 WorldCom?

4 COMMISSIONER BAEZ: If I was your customer then  
5 I would think twice if I was going to have to port back to  
6 Verizon.

7 THE WITNESS: Right, you would. But I'm looking  
8 at the customer as far as being fair to the customer and  
9 giving them the flexibility and ability to use what they  
10 are paying for, which has been commented earlier the cost  
11 to port. They are paying monthly to port. But if they do  
12 port and switch to another carrier, if they switch from  
13 WorldCom to Verizon, then they are penalized because there  
14 will be a requirement for a number change.

15 Now, do I have a problem if the customer is  
16 locked into me? No, I do not. But I'm looking at the  
17 fairness for the customer as far as flexibility and the  
18 purpose behind porting and what they are paying for.

19 COMMISSIONER BAEZ: Thanks for being so honest.  
20 I mean, I just hasn't -- it just hadn't clicked. I hadn't  
21 heard anyone else say that.

22 THE WITNESS: You're right. I mean, I have no  
23 problem if they are locked into me forever. I mean, they  
24 can be grandfathered and be my customer forever, that is  
25 fine with me.



1                   **COMMISSIONER BAEZ:** So we are not -- I guess  
2 I've been trying to look at this as some type of  
3 competitive issue. And I think it probably works in  
4 reverse. I mean, in a sense, right?

5                   **THE WITNESS:** Right. So I guess my thought is  
6 more for the good of the customer, what is fair to the  
7 customer.

8                   **COMMISSIONER BAEZ:** And we are so glad you are  
9 looking out for that.

10                  **COMMISSIONER PALECKI:** Thank you. I think you  
11 followed up well on my question. Thank you.

12                  **COMMISSIONER DEASON:** Redirect.

13                                   **REDIRECT EXAMINATION**

14 **BY MR. SELF:**

15                  **Q**     Just one question, if I may. You have been  
16 asked a lot of questions about grandfathering. Are you  
17 aware of anyplace where grandfathering like that has  
18 occurred?

19                  **A**     No, I'm not.

20                  **MR. SELF:** That's all I have.

21                  **COMMISSIONER DEASON:** Exhibits.

22                  **MR. SELF:** Yes, we would move Exhibit 11.

23                  **COMMISSIONER DEASON:** Without objection show  
24 that Exhibit 11 is admitted.

25                  **Ms. Thomas, you may be excused.**



1 5613 DTC Parkway, Englewood, Colorado 80111.

2 Q By whom are you employed and in what capacity?

3 A Time Warner Telecom, and I am Director of  
4 Operations Planning, Policy and Procedures.

5 Q Have you caused to be prepared and filed direct  
6 and rebuttal testimony in this docket?

7 A No. Yes, I have, excuse me.

8 COMMISSIONER DEASON: Boy, this was going to be  
9 short there for a moment.

10 BY MS. CAMECHIS:

11 Q Are there any additions, deletions, changes, or  
12 modifications to your testimony?

13 A I have one change, it is in the rebuttal  
14 testimony, Page 2, Line 14. Change impacts to impact.

15 Q And you would consider that a typographical  
16 error, correct?

17 A That was a typographical error.

18 Q If I were to ask you the same questions today,  
19 would you provide the same responses?

20 A Yes.

21 MS. CAMECHIS: Mr. Chairman, I would ask that  
22 the witness' testimony be inserted into the record as if  
23 so read.

24 CHAIRMAN DEASON: Without objection it shall be  
25 so inserted.

1 **BY MS. CAMECHIS:**

2 **Q Mr. Tystad, do you have any exhibits to your**  
3 **testimony?**

4 **A I have one.**

5 **Q And is that Exhibit CT-1 to your direct**  
6 **testimony?**

7 **A Yes.**

8 **MS. CAMECHIS: Mr. Chairman, I would ask that**  
9 **that exhibit be marked for identification as I believe it**  
10 **is Exhibit 12.**

11 **COMMISSIONER DEASON: That is correct, Exhibit**  
12 **12.**

13 **MS. CAMECHIS: Thank you.**

14 **(Exhibit 12 marked for identification.)**

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1 INTRODUCTION

2 QUALIFICATIONS

3 **Q: Please state your name, position, and business address.**

4 A: My name is Craig Tystad. I am the Director of Operations Planning for Time  
5 Warner Telecom. My business address is 5613 DTC Parkway, Englewood, CO  
6 80111.

7 **Q: Please summarize your educational background and previous experience in**  
8 **the telecommunications field.**

9 A: I have nineteen years of experience in the engineering and operations areas of  
10 telecommunications. Before coming to Time Warner Telecom, I was employed  
11 by US West in operational and engineering managerial positions from 1979  
12 through 1993. When I came to Time Warner Telecom in 1993, I planned and  
13 implemented TWTC's switching services including the management of all  
14 aspects of switched services: service provisioning, networks inventory, capacity  
15 management, telephony number administration, inter-company compensation,  
16 message processing, switch surveillance, and trouble management for seventeen  
17 Lucent 5ESSs. Since 1997, I have been in my current job capacity and am  
18 responsible for setting company policy and direction in relation to operation  
19 support systems, new technology implementation, and new product  
20 development. Please find attached my vitae.

21 **Q: Have you previously testified before the Florida Public Service Commission**  
22 **("Commission")?**

23 A: No.

1 SUMMARY OF TESTIMONY

2 **Q: On whose behalf is this testimony offered?**

3 A: I am testifying on behalf of Time Warner Telecom of Florida, L.P.

4 **Q: What is the purpose of your testimony?**

5 A: My testimony responds to the tentative issues designated in Order No. PSC-01-  
6 0380-PCO-TP, by discussing the impact on TWTC of Verizon's intent to  
7 expand from one rate center to five in the Tampa area.

8 **Q: Please summarize your testimony.**

9 A: Currently, the Tampa area has different rate center designations for Verizon and  
10 the ALEC's serving customers in that area. According to its tariff, Verizon has  
11 five rate centers in the Tampa area, e.g., Tampa Central, North, South, East and  
12 West. However, ALEC's entering the marketplace in Tampa have used the  
13 LERG to set up their dialing and routing plans, which includes only one  
14 "Tampa" rate center and encompasses all five of the above-listed rate centers.

15 On February 1, 2001, Verizon made changes to the LERG, against this  
16 Commission's instructions, to bring the LERG in line with the rate centers that  
17 their local exchange tariff identified. These changes created significant  
18 discrepancies in the Tampa area based upon the differing treatment of rate  
19 centers by Verizon and the ALECs. Verizon should be ordered to "undo" their  
20 modifications immediately, to avoid the premature exhaustion of the 813 area  
21 code and to avoid undue burdens and costs on ALECs.

22 Additionally, TWTC supports rate center consolidation. Most of  
23 TWTC's customers are in Tampa Central (with a few in Tampa East). Rate

1 Center consolidation would mean that the local calling area would increase for  
 2 TWTC's Tampa Central & East customers. Using the Verizon General Services  
 3 Tariff - A3.5.1 Local Calling Areas, TWTC's local calling area (for  
 4 Central/East) would expand to include Zephyrhills, Palmetto, New Port Richey  
 5 and Clearwater. Since most customers PIC their intra-LATA toll to their long  
 6 distance carrier, any lost revenue to the exchanges would be minimal. Also,  
 7 having more than one rate center will require ALECs to acquire additional  
 8 numbering resources, and would force ALEC's customers to change their phone  
 9 numbers.

10 **RESPONSES TO TENTATIVE ISSUES LIST ATTACHED TO**  
 11 **ORDER ESTABLISHING PROCEDURE**

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

14 **A:** Yes, the Tampa Market Area should be considered one rate center since the  
 15 more rate centers there are, the more numbering resources will be required due  
 16 to competition. TWTC supports rate center consolidation to one rate center in  
 17 order to forestall premature exhaust of the 813 NPA, in addition to facilitating  
 18 any future numbering resource optimization efforts that may take place.

19 **Q: How would multiple rate centers impact the numbering resources in the**  
 20 **Tampa Market Area?**

21 **A:** Currently TWTC has 4 NXX's that serve the entire Tampa area. In order for  
 22 TWTC to serve customers in the five rate centers designated by Verizon, TWTC  
 23 would be required to designate the codes we currently have to the rate center

1 covering the area where the predominate number of our customers  
2 physically reside. TWTC would then have to request initial codes in the  
3 other four rate centers in order to bring customers into alignment with  
4 Verizon's rate centers, and to allow customers to participate in porting. As a  
5 result, customers may be forced to take a number change to a new area code.

6 This would be the case with each of the approximately 32 ALEC's in  
7 the Tampa area. Each ALEC would be required to go to the NANPA and  
8 request a new NXX for four additional rate centers. This instantly increases  
9 the amount of assigned NXX's to 128, and could contribute to the premature  
10 exhaust of the 813 NPA, in addition to causing customer dissatisfaction due  
11 to required number changes.

12 **Q: What effect will Verizon's changes to its Routing Database System**  
13 **(RDBS) and Business Rating Information Database System (BRIDS)**  
14 **have on other telecommunications carriers in the Tampa Market Area?**  
15 **What effect would one or more rate centers have on telecommunications**  
16 **carriers in the Tampa Market Area?**

17 **A:** Terminating calling plans from outside the Tampa area may disadvantage  
18 TWTC. For example, as the table below demonstrates, a terminating calling  
19 plan from the New Port Richey rate center into the Tampa area must be  
20 defined by Verizon for six (6) different rate centers, Tampa, Tampa Central,  
21 Tampa South, Tampa North, Tampa East, and Tampa West. The Tampa rate  
22 center may be designated as a toll call from New Port Richey, whereas all  
23 other rate centers may be designated as a local call from New Port Richey.



1 TWTC would have no control over the determination of whether the call is  
2 toll or local, thereby negatively impacting TWTC customers.

3 Calling Plan for New Port Richey:

Calls to	Worst Case	Best Case
Tampa	Toll	Local
Tampa Central	Toll	Toll
Tampa North	Local	Local
Tampa South	Toll	Toll
Tampa East	Toll	Toll
Tampa West	Local	Local

4

5 **Q: Should a number pooling trial be implemented in the Tampa**  
6 **Metropolitan Statistical Area? If so, when should the number pooling**  
7 **trial begin?**

8 **A:** Yes, and the trial should be begin July 1, 2001. Number pooling mandates  
9 that there be a separate number pool established for each rate center. In the  
10 Tampa area, there would be six separate number pools, one for each rate  
11 center, i.e. Tampa (ALEC's), Tampa Central, Tampa North, Tampa South,  
12 Tampa East, and Tampa West (Verizon). The problem this creates is that  
13 the ALEC's, of which there are approximately 32, would donate and  
14 participate in one number pool for the "Tampa" rate center. Verizon would  
15 donate, to themselves, and be the only service provider to participate in the  
16 other five rate center pools, since the ALEC's do not have numbers  
17 designated for the five Verizon rate centers. This process defeats the  
18 purpose of number pooling as an optimization method within the 813 NPA.

19 **Q: What other number conservation measures, if any, should the**  
20 **Commission order in the Tampa Market Area? If other number**

1           **conservation measures should be implemented, when should these**  
2           **measures be implemented? How should the cost recovery be**  
3           **established?**

4    A:    Rate center consolidation is a conservation measure that should be ordered  
5           for the Tampa Market Area. Rate center consolidation should be  
6           implemented immediately. Each carrier should absorb the costs of  
7           implementing rate center consolidation.

8    **Q:    Should Verizon be ordered to implement rate center consolidation in the**  
9           **Tampa Market Area?**

10   A:    Yes.

11   **Q:    If Verizon should be ordered to implement rate center consolidation in**  
12           **the Tampa Market Area, how many rate centers should be**  
13           **consolidated? and if so, how should it be implemented?**

14   A:    There should be one rate center for the Tampa area.

15   **Q:    When should the rate center consolidation be effective?**

16   A:    Rate center consolidation should be ordered immediately with completion as  
17           soon as practicable.

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

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

1 **Q: Should Verizon be required to undo changes made prior to August 15,**  
2 **2000, in its RDBS and BRIDS systems? If so, should Verizon be**  
3 **required to file a revised Tariff reflecting one Tampa Rate Center?**

4 **A:** Yes, and Verizon should be required to file a revised tariff reflecting one rate  
5 center for the Tampa market area. Implementation of the proposed  
6 modifications to the RDBS and the BRIDS could result in the premature  
7 exhaustion of NPA 813. If the Commission does not take immediate action  
8 to cease further updates to the RDBS and the BRIDS, all ALECs in the  
9 Tampa area will be required to obtain NXX codes in all five Tampa rate  
10 centers, effective May 1, 2001. Therefore, Verizon should be required to  
11 “undo” changes made prior to August 15, 2000 in its RDBS and BRIDS  
12 systems in order to effectuate rate center consolidation in the Tampa area.

13 **Q: Does this conclude your testimony?**

14 **A:** Yes.

**REBUTTAL TESTIMONY OF CRAIG TYSTAD**

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**Q: VERIZON BELIEVES FIVE RATE CENTERS HAVE EXISTED FOR AT LEAST 30 YEARS. PAGE 3, LINES 3-8. IS THIS AN ACCURATE CHARACTERIZATION OF THE CIRCUMSTANCES IN THE TAMPA AREA?**

**A:** No, Verizon's statement that five rate centers have existed for 30 years in the Tampa area is a mischaracterization of the facts. For decades, Verizon disregarded the fact that its tariff refers to five rate centers and conducted operations in the Tampa area with one rate center. Regardless of the fact that Verizon's tariff refers to five rate centers, from a LERG standpoint, there has been one Tampa rate center for all intents and purposes. Verizon has not offered any pressing need justifying expansion from one to five rate centers in the Tampa area, thereby altering the structure used by Verizon and other carriers for decades.

**Q: MS. MÉNARD STATES THAT THERE WERE "INDUSTRY CONCERNS" POSED AT CIGRR THAT PROMPTED GTE TO BREAK OUT THE LOCALITIES FOR ITS CODES TO REFLECT WHERE WITHIN THE FIVE RATE CENTERS THE CODE RESIDED. PAGE 5, LINES 14-21. DID THOSE "INDUSTRY CONCERNS" REPRESENT A CONSENSUS OF THE ALEC PARTICIPANTS IN CIGRR WHO ARE**

1           **AFFECTED BY VERIZON'S DECISION TO EXPAND FROM ONE TO**  
2           **FIVE RATES CENTERS IN THE TAMPA AREA?**

3   **A:**    No, there was not a consensus amongst ALECs that Verizon should  
4           break out the localities for its codes to reflect where in the existing five-  
5           tariffed rate centers in Tampa the code resided.

6  
7   **Q:**    **ARE ALECs FREE TO DETERMINE THE LOCAL CALLING AREAS**  
8           **FOR THEIR CUSTOMERS, OR DOES EACH ALEC HAVE TO MATCH**  
9           **VERIZON'S RATE CENTER? PAGE 7, LINES 6-12.**

10 **A:**    Yes, an ALEC may determine the local calling areas for its customers;  
11           however, each ALEC must match Verizon's rate center. If the rate  
12           centers do not match, there will be a significant impact~~§~~ on number  
13           portability, call termination, and number pooling issues. Unless Verizon  
14           and the ALEC use the same actual geographic definition of the area,  
15           expanding from one to five rates centers will negatively impact  
16           customers and other telecommunication companies with little or no  
17           corresponding benefit.

18  
19 **Q:**    **MS. MENARD USED INFORMATION FROM THE 911 DATABASE TO**  
20           **DETERMINE THE APPROPRIATE RATE CENTERS FOR**  
21           **CUSTOMERS. PAGE 9, LINES 21-23. WAS USE OF INFORMATION**  
22           **FROM THE 911 DATABASE APPROPRIATE FOR THAT PURPOSE?**

1 A: No. Verizon's interconnection agreement with Time Warner Telecom of  
2 Florida, L.P. (Time Warner), states as follows:

3 Article VIII, Section 3.4.5.5.7 - GTE agrees to treat  
4 all data on TWTC subscribers provided under this  
5 Agreement as strictly confidential and to use data on  
6 TWTC subscribers only for the purpose of providing  
7 E-911 services.

8 Accordingly, Verizon's use of information from the 911 database  
9 constitutes a breach of its Interconnection Agreement with Time Warner.

10

11 **Q: VERIZON RECOMMENDS THAT EXISTING ALEC CUSTOMERS WHO**  
12 **ARE NOT PHYSICALLY LOCATED IN THE TAMPA CENTRAL RATE**  
13 **CENTER SHOULD KEEP THEIR TELEPHONE NUMBERS UNLESS**  
14 **THEY MOVE THEIR SERVICE TO ANOTHER ALEC. PAGE 10, LINES**  
15 **19-23. IF VERIZON'S RECOMMENDATION IS ACCEPTED, WHAT**  
16 **WILL BE THE ACTUAL IMPACT ON CUSTOMERS?**

17 A: If Verizon uses five rate centers while other carriers use one, when a  
18 customer wishes to move its service from one ALEC to another ALEC,  
19 from an ALEC to Verizon, or from Verizon to an ALEC, the benefits of  
20 number portability would not be available unless the affected carriers  
21 uses the same rate center structure. The customer would be required to  
22 take a number change simply by virtue of the fact that the customer lives  
23 in the Tampa area, whereas in every other area in Florida, the benefits of

1 number portability would be available. Based upon this result, it appears  
2 that customers in the Tampa area would not receive the same level of  
3 service enjoyed by customers in other areas of the state.

4

5 **Q: MS. MENARD STATES THAT VERIZON'S RECOGNITION IN THE**  
6 **LERG OF FIVE TAMPA RATE CENTERS HAS NOT HAD ANY**  
7 **IMPACT ON LOCAL NUMBER PORTABILITY (LNP). PAGE 11,**  
8 **LINES 25 THROUGH PAGE 12, LINE 15. IS THIS AN ACCURATE**  
9 **CHARACTERIZATION OF THE FUTURE IMPACT OF EXPANDING**  
10 **FROM ONE TO FIVE RATE CENTERS IN THE TAMPA AREA?**

11 **A:** No. Time Warner experienced a similar situation in Rochester, NY,  
12 where Time Warner did not match the ILEC's rate center. The  
13 mismatched rate centers had a significant negative impact on Time  
14 Warner from an administrative and resource standpoint, in addition to  
15 creating significant difficulties with number porting and customer billing.

16

17 **Q: DOES VERIZON'S RECOGNITION OF FIVE TAMPA RATE CENTERS**  
18 **IMPACT ALECs?**

19 **A:** Yes. I must disagree with Ms. Menard's assertion that there will be no  
20 immediate impact on ALECs. Page 13, Lines 4-17. Once again, the  
21 only way there will not be an impact on ALECs is if all ALECs match  
22 Verizon's rate centers. If ALECs have one rate center while Verizon has  
23 five, number pooling, portability and termination issues arise

1 immediately. On the other hand, if ALECs match Verizon's five rate  
2 centers, premature exhaustion of the 813 area code is the issue.

3

4 **Q: SHOULD VERIZON BE REQUIRED TO IMPLEMENT RATE CENTER**  
5 **CONSOLIDATION IN THE TAMPA MARKET AREA?**

6 A: This question is actually a mischaracterization of the issue. If the  
7 Commission requires Verizon to use one rate center for the Tampa area,  
8 Verizon would not be required to consolidate Tampa area rate centers;  
9 rather, they would be prohibited from expanding the number of rate  
10 centers in the Tampa area from one to five.

11

12 **Q: IS VERIZON'S CONCERN WITH MANAGING NUMBERING**  
13 **RESOURCES AT THE RATE CENTER LEVEL RELEVANT TO THIS**  
14 **DOCKET? PAGE 17, LINES 1-20.**

15 A: No, this issue is not relevant to whether Verizon should be allowed to  
16 expand from one to five rate centers in the Tampa market area. This  
17 issue is not a rate center consolidation issue at all; rather, it is a number  
18 optimization issue that is equally applicable to all carriers, not just  
19 Verizon. The issue exists whether or not Verizon expands from one to  
20 five rate centers in the Tampa area.

21

22 **Q: SHOULD VERIZON BE REQUIRED TO UNDO THE CHANGES MADE**  
23 **PRIOR TO AUGUST 15, 2000 AND, IF SO, SHOULD VERIZON BE**



1           **REQUIRED TO FILE A REVISED TARIFF REFLECTING ONE TAMPA**  
2           **RATE CENTER?**

3    **A:**    Yes, considering the impacts on number portability, number pooling, call  
4           termination, and premature exhaustion of the 813 area code, Verizon  
5           should be required to undo changes made prior to August 15, 2000, and  
6           should be required to amend their tariff to reflect one rate center instead  
7           of five for the Tampa Area.

8

9    **Q:**    **DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

10   **A:**    Yes, it does.

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1 **BY MS. CAMECHIS:**

2 **Q Mr. Tystad, do you have a brief summary?**

3 **A Yes, I do.**

4 **Q Would you please provide your testimony?**

5 **A Time Warner Telecom believes that Verizon should**  
6 **not be allowed to expand from one rate center in the LERG**  
7 **to five rate centers. Time Warner Telecom believes that**  
8 **customers and other communication carriers in the area**  
9 **would be significantly impacted by Verizon's changes in**  
10 **the rate center structure. These changes will stifle**  
11 **competition by limiting customer options, causing customer**  
12 **confusion and causing ALECs to incur costs. The changes**  
13 **will also cause premature exhaust of the 813 area code.**

14 **The bottom line is that we don't believe**  
15 **customers and competitors should bear the burden of fixing**  
16 **Verizon's mistake. The best number conservation measure**  
17 **is to retain a single rate center for Tampa. That's it.**

18 **MS. CAMECHIS: Mr. Chairman, we tender Mr.**  
19 **Tystad for cross examination.**

20 **COMMISSIONER DEASON: Mr. Beck.**

21 **MR. BECK: No questions.**

22 **CROSS EXAMINATION**

23 **BY MS. CASWELL:**

24 **Q Good afternoon, Mr. Tystad. Do you understand**  
25 **Verizon's proposal to grandfather existing customers so**

1 that they would not need to take a number change?

2 A I understand the proposal, but I do not agree  
3 with it.

4 Q Okay. Do you understand that grandfathering  
5 only effects customers physically located outside of the  
6 Tampa central rate center?

7 A Yes.

8 Q And so the only customers that would need to  
9 take a number change if they switch back to Verizon, for  
10 example, are the customers outside of Tampa central,  
11 correct?

12 A That is correct.

13 Q And how many customers does Time Warner have  
14 outside of Tampa central?

15 A It is a small number.

16 Q Can you give me any kind of a proportion?

17 A It doesn't matter. I mean, my customer -- you  
18 can't compare my customer base to a residential type  
19 provider.

20 Q Okay. Well, let me ask you this way. Do you  
21 have any reason to disagree with Ms. Menard's analysis  
22 that only two percent of the ALECs' customers are  
23 physically outside of the Tampa central rate center?

24 A I don't, I can't disagree with that.

25 Q Have you heard anyone here today but Ms. Menard

1 offer any statistics about how many ALEC customers are in  
2 the four rate centers other than Tampa central?

3 A No.

4 Q In your opening statement you said, I believe,  
5 that Verizon's proposal would limit customers options, is  
6 that correct?

7 A That is correct.

8 Q And what kind of options is Verizon limiting if  
9 it harmonizes the LERG with its tariffs?

10 A The limitations I was indicating is that any  
11 time you make a rate center smaller, that means if a  
12 customer outgrows their business and needs to move to a  
13 business park they have a greater chance of having to take  
14 a number change. There are other impacts that affect our  
15 ability to serve that customer any time you start – take  
16 a big rate center and put it to a small rate center.

17 Q But Verizon's proposal doesn't affect your  
18 calling scopes, does it?

19 A Which aspect of calls, the wholesale portion or  
20 the retail?

21 Q The calling scopes that you offer to customers,  
22 you're free to offer any kind of calling scope you want,  
23 correct? So that if you want to offer them all of Tampa,  
24 you can; if you want to offer them something that  
25 corresponds to each of those five rate centers, you can;

1 you are free to do anything you want, correct?

2 A From a retail perspective that is a true fact.

3 But, you have to look at the wholesale cost of terminating  
4 those calls. In the interconnect agreement we have to  
5 pay, we would have to pay whatever Verizon destines that  
6 call to be, toll, local, EAS.

7 Q Okay.

8 A So -- let me just finish that thought. So, in  
9 essence, that drives how our customers -- what we will  
10 retail to our customers. We have to be able to recover  
11 our costs.

12 Q Okay. And in our interconnection agreement with  
13 you, EAS, ECS, and local are all considered local calls  
14 for reciprocal compensation purposes, are they not?

15 A I don't have the interconnect agreement in front  
16 of me, I can't --

17 Q Okay. And when you talk about terminating  
18 calling plans, are you assuming that your calling scopes  
19 are necessarily the same as Verizon's?

20 A In most cases they are the same.

21 Q But that criticism would assume that, wouldn't  
22 it, necessarily?

23 A I don't understand.

24 Q Let me ask you this. Even if your calling  
25 scopes are the same as ours, in your talking about

1 terminating calling plans being effective, wouldn't that  
2 just be the case for customers that were outside of the  
3 Tampa central area?

4 A My reference to terminating was I have to pay to  
5 terminate a call on somebody else's network. The rate  
6 that I have to pay is driven by the interconnect  
7 agreement, which in the Verizon example is it has to match  
8 Verizon's calling plan. So my --

9 Q Are you saying that our interconnection  
10 agreement with you requires you to match your local  
11 exchange areas or calling scopes with ours?

12 A For retail reciprocal compensation.

13 Q Do you have a copy of that agreement with you?  
14 Have you seen that specific provision you are referring  
15 to?

16 A I was on the interconnect agreement for the  
17 first generation. My understanding is we just finished  
18 the second generation and that provision did stay in  
19 there.

20 Q And just so I'm clear what that provision says,  
21 does it say that you need to match our calling scopes?

22 A For reciprocal compensation. So you have got to  
23 look at it from a wholesale/retail standpoint.

24 Q But you don't match our calling scopes except on  
25 the retail level, correct? There is no issue of calling

1 scope with reciprocal compensation, it's only on the  
2 retail level that you have calling scope, correct?

3 A We can define the calling scope on the retail  
4 side.

5 Q And you do define a calling scope on the retail  
6 side, for instance in your price list before this  
7 Commission, correct?

8 A Generally, we are driven to match because we  
9 have to recover cost.

10 Q And I think you have testified earlier you don't  
11 know if – you don't know if EAS and ECS are considered  
12 local within your interconnection agreement, correct?

13 A I don't.

14 Q I think you also stated in your opening  
15 statement that customer confusion would ensue if Verizon  
16 harmonized its LERG with the tariffs or harmonized its  
17 tariffs with the LERG. What kind of confusion are you  
18 talking about?

19 A Any time -- we have learned from experience, we  
20 do have experience in this, any time you adjust rate  
21 centers you need to communicate with every customer. You  
22 have to touch every customer. Because the potential for  
23 impacting the customer from a service standpoint, from a  
24 billing standpoint, you need to touch them and talk to  
25 them and communicate what is going on.

1           **Q**     But, again, our recognizing the rate centers in  
2 the LERG doesn't affect your calling scopes, correct? You  
3 have the freedom to make your calling scope whatever you  
4 want it to be, right?

5           **A**     If we go down the path of five rate centers, I  
6 have to look at every customer. I have to go into my  
7 operational support systems just as you would if we went  
8 the one rate center route. I have to go in and make  
9 changes from Tampa to the five individuals, so I have the  
10 same burden you do if we go the five rate centers.

11          **Q**     But I'm talking about -- I'm talking about the  
12 customer confusion aspect. Would you change customers'  
13 calling scopes if we harmonize our tariffs and the LERG?

14          **A**     We have to look at that. But we would  
15 communicate with the customers on this change.

16          **Q**     And what would you be communicating to them? If  
17 their rates and their calling scopes aren't changing, why  
18 do you need to tell them anything?

19          **A**     We laid out certain expectations, certain things  
20 we would deliver, we just need to recommunicate that this  
21 is what we can do. Sitting right here right now I can't  
22 say that it's this, this, and this. But anytime you touch  
23 your switch, your operational support system, you have the  
24 potential to impact your customer, my customer.

25          **Q**     And I'm just trying to figure out how. What



1 would you be communicating to them?

2 A That, for example, if you move you can only move  
3 within this rate center. Before they could move within  
4 this rate center.

5 Q When you say they could move within the rate  
6 center, what do you mean move, physically move?

7 A If they outgrew their business.

8 Q So that's really the only situation we have  
9 identified. If a customer outgrows its business and wants  
10 to expand across rate center boundaries that would, in  
11 your mind, affect the customer?

12 A That is one of the aspects I would communicate.

13 Q Can you identify any other situation where our  
14 change would affect the customer?

15 A The marketing people would have to sit down to  
16 ensure that the rate plans and how we were going to bill  
17 the customer would stay the same. Sitting here right now  
18 right now I could not say that.

19 Q And so you have no reason to believe,  
20 necessarily, that the billing or the rate plans would  
21 change?

22 A My initial thought is I think they will.

23 Q Why would they have to change?

24 A Anytime you go from a big rate center, the  
25 calling plan, our retail calling plan is probably going to

1 change when we go down to a smaller rate center.

2 Q But are you offering a calling scope that  
3 includes all of the five Tampa rate centers today?

4 A Today we have one rate center defined for our  
5 retail offering.

6 Q And that includes all of our five Tampa tariffed  
7 rate centers?

8 A Uh-huh.

9 Q And you don't need to change that because of the  
10 change in harmonizing our LERG and the tariffs, correct?

11 A No, I do have to go into my operational support  
12 systems.

13 Q But you don't need to change the calling scope  
14 for those customers, correct? You can leave the calling  
15 scope as it is?

16 A I can't say that looking right now. That is  
17 something we would have to analyze and do an impact study.

18 Q But that would be a business decision on your  
19 part, correct?

20 A Yes.

21 Q Okay. Now, are you recommending rate center  
22 consolidation in this case?

23 A I'm calling this rate center expansion. Time  
24 Warner takes what is in the LERG as our rate center  
25 boundary.

1           **Q     So are you recommending rate center**  
2 **consolidation? Are you recommending that our five**  
3 **tariffed rate centers be collapsed into one big tariffed**  
4 **rate center?**

5           **A     Yes.**

6           **Q     And did you consider at all the Commission's**  
7 **authority to do that?**

8           **A     That is out of my area of expertise, I did not.**

9           **Q     Okay. In your direct testimony, I think it's at**  
10 **Pages 2 to 3, you state that rate center consolidation**  
11 **would mean that the local calling area would increase for**  
12 **Time Warner's Tampa central and east customers. First of**  
13 **all, let's look at the designation of Tampa central and**  
14 **east customers. That seems to indicate that Time Warner**  
15 **has calling areas that correspond to Verizon's Tampa**  
16 **central and Tampa east rate centers, would that be true?**

17          **A     Can you repeat the question.**

18          **Q     Again, I'm reading from your testimony at Pages**  
19 **2 to 3, Line 23, over to Line 1 on Page 3. Rate center**  
20 **consolidation would mean that the local calling area would**  
21 **increase for Time Warner's Tampa central and east**  
22 **customers. You're using the designations Tampa central**  
23 **and east customers, which seems to indicate that you have**  
24 **calling areas that correspond to Tampa central and Tampa**  
25 **east. Would that be a correct assumption?**

1           **A     I would say -- I am not sure.**

2           **Q     Okay. And, again, you're saying that rate**  
3 **center consolidation would mean that their local calling**  
4 **area would increase, but that would only be true if you**  
5 **decided it should increase, correct?**

6           **A     That is true.**

7           **Q     Okay. Let's look at Page 4 of your direct**  
8 **testimony. I'm sorry, that's your rebuttal testimony.**  
9 **Let's look at Page 4 of your rebuttal testimony, Lines 20**  
10 **through 22. Are you with me? There it says the only way**  
11 **there will not be an impact on ALECs is if all ALECs match**  
12 **Verizon's rate centers. Isn't that, in fact, what Verizon**  
13 **is proposing?**

14          **A     Yes. The point of this is that all providers**  
15 **have to match.**

16          **Q     Okay.**

17          **A     So whether it's one rate center or five. You**  
18 **can't have six is the general point of this one.**

19          **Q     Okay. Thank you.**

20                   **MS. CASWELL: That's all that I think I have.**

21                   **COMMISSIONER DEASON: Staff.**

22                                   **CROSS EXAMINATION**

23 **BY MR. FORDHAM:**

24           **Q     Mr. Tystad, you have stated that in order to**  
25 **serve customers in the five rate centers that are to be**

1 designated by Verizon, or that have been designated by  
2 Verizon that you would have to request initial codes in  
3 the other four rate centers in order to bring your  
4 customers into alignment with Verizon's rate centers.

5 On any occasion when you have requested codes  
6 for the Tampa market, has the code administrator ever  
7 discussed your request to determine which Tampa rate  
8 center the code should be assigned to?

9 A I don't have day-to-day responsibility of  
10 applying for additional numbering resources, so I can't –  
11 I have no knowledge of that.

12 Q On Page 4 of your testimony, Lines 12  
13 through 23 –

14 A Direct or rebuttal?

15 Q Direct. You state that the configuration of  
16 rate centers would affect the calling scopes and therefore  
17 some local calls may become toll calls.

18 Can you tell us, please, whether it is  
19 technically possible to retain the same calling plans with  
20 a new rate center structure?

21 A Can you repeat, I didn't quite follow the  
22 question.

23 Q Okay. In your testimony you had stated that the  
24 calling scopes would be changed and therefore some calls  
25 would become toll calls and so forth. That was in your

1 testimony. The question is do you know whether it is  
2 technically possible to retain the same calling plans  
3 under the new rate center structure?

4 A Technically anything is possible. You can rate  
5 any call the way you want, technically. That question is  
6 very hard because when you combine two, you know, things  
7 will change.

8 Q Can you explain to us how toll calls are  
9 calculated, including whether mileage is a parameter to  
10 indicate whether a call could be local or toll?

11 A Do you want to know the way Time Warner  
12 calculates it or in general? There are different ways  
13 look at it. There is message, there is --

14 Q Let's stick with Time Warner and explain how  
15 your toll calls are calculated, is mileage a parameter and  
16 so forth?

17 A I don't know for sure. But in most cases it's a  
18 flat per minute of use with no mileage calculation. That  
19 is generally the way we set up a toll plan. I don't know  
20 if Tampa is set up exactly that way.

21 MR. FORDHAM: I don't have any other questions.

22 COMMISSIONER DEASON: Commissioners. Redirect.

23 MS. CAMECHIS: Yes. Thank you, Mr. Chairman.

24 REDIRECT EXAMINATION

25 BY MS. CAMECHIS:

1           **Q**     **Mr. Tystad, earlier Ms. Caswell asked you how**  
2 **many of Time Warner Telecom's customers are located in**  
3 **Verizon's tariffed Tampa south, north, east, and west rate**  
4 **centers. And I believe your response was that it didn't**  
5 **matter because you couldn't compare our customer base with**  
6 **a residential carrier's. Did I misstate your testimony?**

7           **A**     **That is true.**

8           **Q**     **That is true. Why do you say that you can't**  
9 **compare our customer bases?**

10          **A**     **I mean, one of my customers could generate the**  
11 **revenue of 1,000 residential customers. So from an impact**  
12 **and an importance to that customer, that service is**  
13 **probably more important.**

14          **Q**     **So even if only two percent of Time Warner's**  
15 **customers were located outside of the Tampa central rate**  
16 **center, that could virtually mean, you know, a substantial**  
17 **portion of our business?**

18          **A**     **Yes.**

19          **Q**     **Are you familiar with any circumstance or**  
20 **situation in which Time Warner's rate centers did not**  
21 **match the ILEC's?**

22          **A**     **We have one example in Rochester, New York.**  
23 **That was our first venture into switched services. Back**  
24 **in 1994 we placed Time Warner's first 5E in the Rochester,**  
25 **New York rate center. Time Warner made a decision that we**

1 would -- from a marketing advantage we would offer a big  
2 rate center that encompassed four or five of the  
3 incumbents. That worked fine for three or four years, and  
4 at that point we started running into trouble. We were  
5 forced then to expand our rate centers to match the LEC's.  
6 It was a huge disaster for Time Warner, politically,  
7 customer-wise. We got our name in the paper.

8           So we have taken the position that we will  
9 address any grandfathering and we will force a number  
10 change to get that customer in line so they are not in a  
11 one-off scenario. Any time you leave a customer in a  
12 one-off scenario there is impact. They will be impacted  
13 at some point. It's not just a number change, it is  
14 receiving -- their neighbor could receive a call that is  
15 local, and that same person calling the Time Warner  
16 customer, it could be long distance and vice versa.  
17 Out-bound the neighbor could call, it's a local calling;  
18 if the Time Warner customer calls, it's a long distance  
19 call.

20           So there are many unforeseen ways that a  
21 customer is impacted anytime you change a rate center. So  
22 we are taking this very seriously here. From a customer  
23 standpoint, the bigger your rate center the better service  
24 they are going to have. They have more options, more  
25 providers, they can move farther. From a customer



1 standpoint it's a much better deal.

2 COMMISSIONER DEASON: Let me ask a question.

3 You mentioned Rochester and a situation that you  
4 experienced there, and you indicated that you were forced  
5 to make a change in your calling area, did I understand  
6 that correctly?

7 THE WITNESS: We had to expand -- we had to  
8 expanded our one rate center down to five little rate  
9 centers. So it was almost the exact same scenario with  
10 the exception that Time Warner caused the problem.

11 COMMISSIONER DEASON: Well, I guess my question  
12 is you indicated that you made a business decision and it  
13 worked well for a number of years and then for some  
14 apparent reason you had to change. What was the reason?

15 THE WITNESS: Number portability. The ILEC  
16 started rejecting our request to port numbers because of  
17 rate center issues. The big one that got us the press was  
18 that terminating calls to our customers was toll versus  
19 local to an ILEC.

20 COMMISSIONER DEASON: But wouldn't just the  
21 opposite exist, some that were terminating for your  
22 customers would be local whereas for the incumbent LEC  
23 they were toll? Didn't it work both ways.

24 THE WITNESS: Yes, it could. But in this case  
25 the only one that got brought up was Time Warner was a

1 toll call.

2 **COMMISSIONER DEASON:** So when you made the  
3 change, then, were there not -- there were situations  
4 where your customers could make toll-free calling that  
5 would be converted to toll calls?

6 **THE WITNESS:** Yep. But the expectation of the  
7 customer is that it doesn't matter who the service  
8 provider is, the phone works exactly the same. So if it  
9 is a local call from this phone, it better be a local call  
10 from this phone.

11 **COMMISSIONER DEASON:** Well, I guess I'm at a --  
12 would not you be able to market that as distinguishing you  
13 from the incumbent, that you have a larger local calling  
14 area?

15 **THE WITNESS:** In this case it -- in this case on  
16 the terminating side we had no control over that. It was  
17 actual another incumbent. It wasn't Rochester Tel that  
18 got us, it was another incumbent that actually started  
19 charging to terminate to a Time Warner customer.

20 **MS. CAMECHIS:** I have no further questions.

21 **THE WITNESS:** Can I just --

22 **MS. CAMECHIS:** I'm sorry.

23 **THE WITNESS:** So what we learned out of that is  
24 you have to match the rate centers and pretty much the  
25 calling plan of the LEC.

1                   **COMMISSIONER DEASON:** Well, let's back up for  
2 just a moment, then. I understood that one of the  
3 founding principles of the Telecommunications Act of '96  
4 was that it would allow competitors to enter a marketplace  
5 and provide new services, maybe rearranged services, to do  
6 whatever is necessary in the competitive market to  
7 distinguish themselves and to address customer needs. And  
8 that if there were customers out there who desired a  
9 larger calling scope and were willing to pay for it, that  
10 you can meet that need and be rewarded in the market for  
11 identifying a customer need. What I hear you saying now  
12 is, well, that's all for naught. We are obligated – you  
13 have found that you need to have your calling scopes  
14 always match those of the incumbent.

15                   **THE WITNESS:** That's what it has beared out.

16                   **COMMISSIONER DEASON:** So you are saying in  
17 reality some of the hope of the basis for the  
18 Telecommunications Act of '96 is for naught?

19                   **THE WITNESS:** Well, you have got to look at it a  
20 couple of different ways. From a base service standpoint  
21 we can differentiate there; different products, cheaper  
22 prices, that sort of thing. But from a toll standpoint,  
23 it is looking that we need to match.

24                   **COMMISSIONER DEASON:** But you agree that for the  
25 customers you sign up, for your customer you are free to

1 say a call from Point A to Point B for your customers is  
2 toll free?

3 THE WITNESS: Yes.

4 COMMISSIONER DEASON: Where the problem comes in  
5 is if there is a customer who wants to terminate a call to  
6 your customer at Point A and they are an incumbent  
7 customer that resides at Point B, that that customer is  
8 going to have to pay a toll and you are going to have to  
9 pay terminating -- no, you would receive terminating  
10 access at that point, would you not?

11 THE WITNESS: We would receive -- yes. So from  
12 a wholesale that would be a better deal, but the press we  
13 got was from a retail standpoint.

14 COMMISSIONER DEASON: That subscribers who were  
15 not your customers had to pay a toll call to call your  
16 customer, whereas if they were your customer they would  
17 not have to pay a toll call.

18 THE WITNESS: That's correct.

19 COMMISSIONER DEASON: It looks to me like that  
20 would be a tremendous marketing advantage for you.

21 THE WITNESS: But we were not in that area. We  
22 were not in the area that was calling my customers. It  
23 was outside of Rochester.

24 COMMISSIONER DEASON: It would be a -- it would  
25 be a toll call for anyone, then. If you were not in the

1 there, anyone that lives in that area that calls your  
2 customer would pay a toll. But if they called an  
3 incumbent customer living in the same area they would  
4 still pay a toll, would they not?

5 THE WITNESS: To my customer they would pay toll  
6 because it was in a rate center that did not match.

7 COMMISSIONER DEASON: Because it was what?

8 THE WITNESS: Because my customer was designated  
9 to be in a rate center that they were not. So the  
10 customer of the ILEC is designated to the appropriate rate  
11 center. So then somebody outside of the local calling  
12 area calling my customer would be rated toll. That same  
13 customer calling the ILEC would be a local call.

14 CHAIRMAN DEASON: And it all depends on where  
15 the incumbent LEC assigns your particular customer in the  
16 rate center, which rate center that person –

17 THE WITNESS: I assigned that customer a phone  
18 number from a different rate center so –

19 COMMISSIONER DEASON: Further redirect?

20 MS. CAMECHIS: No further redirect.

21 COMMISSIONER DEASON: Exhibits. Do we have  
22 Exhibit 12?

23 MS. CAMECHIS: Yes, we would like to move that  
24 Exhibit 12 be entered into the record.

25 COMMISSIONER DEASON: Without objection show

1 then that Exhibit 12 is admitted.

2 Thank you, Mr. Tystad, you may be excused.

3 (Exhibit 12 admitted into the record.)

4 COMMISSIONER DEASON: I believe that is the last  
5 witness. We have a number of items we need to address  
6 before we conclude. First, we have three late-filed  
7 exhibits, Exhibits 6, 9, and 10. We need to establish a  
8 filing date for those exhibits.

9 Ms. Caswell.

10 MS. CASWELL: I remember 9 and 10 agreeing to a  
11 week. I can't remember what Exhibit 6 was.

12 COMMISSIONER DEASON: It was just --

13 MS. CASWELL: Oh, yes. We can do that within a  
14 week, too. A week from today.

15 MR. FORDHAM: Commissioner, we need to add to  
16 that, I think, Exhibit 2, because we were unable to  
17 retrieve the full range of correspondence that had been  
18 contemplated by the exhibit. We will have to do that and  
19 provide it to the parties for their approval and then  
20 submit that. A week would be adequate for that, also.

21 COMMISSIONER DEASON: Okay. I trust you  
22 discussed this with the parties and we will just then  
23 designate Exhibit 2 as a late-filed, and you likewise will  
24 provide that within one week?

25 MR. FORDHAM: That is correct, sir.

1                   **COMMISSIONER DEASON:** Very well. We also have  
2 the matter of a legal issue which needs to be briefed.  
3 But we need to determine the exact terminology or the  
4 wording of the issue. Mr. Self.

5                   **MR. SELF:** Yes, Commissioner. I have some draft  
6 language that I think we all agree is not the greatest on  
7 Earth, but will work. What I have is as a legal issue  
8 under current Florida and federal law, what is the extent  
9 of the Commission's authority to order rate center  
10 consolidation. And I don't know if you want that as  
11 Issue A or whatever the next issue is.

12                   **MR. FORDHAM:** I would think Issue A would be the  
13 appropriate designation.

14                   **COMMISSIONER DEASON:** I'm sorry?

15                   **MR. FORDHAM:** I think Issue A would be the  
16 appropriate designation for it.

17                   **COMMISSIONER DEASON:** Okay. I assume the  
18 parties are in agreement with this terminology?

19                   **MS. CAMECHIS:** Yes.

20                   **COMMISSIONER DEASON:** Very well. Staff, are you  
21 in agreement?

22                   **MR. FORDHAM:** Yes.

23                   **COMMISSIONER DEASON:** Are there any other final  
24 matters we need to address?

25                   **MR. FORDHAM:** Yes, Commissioner. There was a

1 document referred to as the tier document or something  
2 showing rate tiers that Mr. Self shared with Verizon and  
3 staff did not get a look at that. Could we have a brief  
4 look at that before we close the hearing?

5 COMMISSIONER DEASON: Surely.

6 (Pause).

7 MR. FORDHAM: I think this document would be  
8 helpful if it were in the record. I don't remember if it  
9 was moved.

10 COMMISSIONER DEASON: No, it was not even  
11 identified.

12 MS. CASWELL: No, and I think I'm going to have  
13 to object to that because I don't think it is even clear  
14 what it is, who prepared it. I'm not sure if there is a  
15 date on that. I just would have some hesitation about  
16 including that in the record without any knowledge of what  
17 exactly it is or who did it.

18 MR. SELF: Well, I believe that Ms. Faul  
19 testified with respect to how the document was obtained  
20 and the information that was conveyed to her in the course  
21 of receiving that document. And I guess to use  
22 Ms. Caswell's words about one of the other exhibits, I  
23 think the Commission could admit that and give it the  
24 appropriate weight based upon the testimony that was  
25 offered at the time that that document was discussed in



1 the record.

2 COMMISSIONER DEASON: Well, let's do this so the  
3 record is clear. At least let's identify it. Now,  
4 whether we admit it or not, we will get to that in a  
5 second. Right now we have an exhibit, we are going to  
6 identify it as Exhibit 13. I need a description, a title  
7 which describes this exhibit. Mr. Self, help me.

8 MR. FORDHAM: The designation on the document  
9 itself, Commissioner, is GT-2A, and it is dated January  
10 25th, 1996.

11 COMMISSIONER DEASON: GT-2A dated 1/25/96?

12 MR. FORDHAM: Correct.

13 COMMISSIONER DEASON: Okay. And this exhibit  
14 came forth while Witness Faul was on the stand, correct?

15 MR. SELF: Yes, for Intermedia.

16 COMMISSIONER DEASON: All right. And she  
17 indicated that she had knowledge of this particular  
18 document, correct?

19 MR. SELF: Yes.

20 COMMISSIONER DEASON: Ms. Caswell.

21 MS. CASWELL: I'm okay with it coming in as long  
22 as we all understand that everything Ms. Faul said was  
23 hearsay. She wasn't around when this document was  
24 prepared or used.

25 COMMISSIONER DEASON: Well, I think the record

1 is clear. She described the extent of her knowledge of  
2 this particular document, and the record is what the  
3 record is. So with that understanding, we will then admit  
4 Exhibit 13. It is going to be incumbent upon someone,  
5 though, to make copies of this and make sure that all  
6 parties have a copy.

7 MR. SELF: I will take care of that, Mr.  
8 Chairman.

9 COMMISSIONER DEASON: Any other matters we need  
10 to address? The schedule for this case?

11 MR. FORDHAM: Briefs are due, Commissioner, on  
12 April the 24th. We are scheduled for a May 29th agenda.

13 COMMISSIONER DEASON: Very well. Do the parties  
14 have anything else at this time? Hearing none, I thank  
15 you all for your participation. This hearing is  
16 adjourned.

17 MR. SELF: Thank you.

18 (The hearing concluded at 4:00 p.m.)

19

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24

25

1 STATE OF FLORIDA )

2 ) CERTIFICATE OF REPORTER

3 COUNTY OF LEON )

4

5 I, JANE FAUROT, RPR, Chief, FPSC Bureau of Reporting  
6 FPSC Commission Reporter, do hereby certify that the  
7 Hearing in Docket No. 010102-TP was heard by the Florida Public  
8 Service Commission at the time and place herein stated.

9 IT IS FURTHER CERTIFIED that I stenographically  
10 reported the said proceedings; that the same has been transcribed  
11 under my direct supervision; and that this transcript, consisting  
12 of 115 pages, Volume 2 constitutes a true transcription of my  
13 notes of said proceedings and the insertion of the prescribed  
14 prefiled testimony of the witnesses.

15 I FURTHER CERTIFY that I am not a relative, employee, attorney  
16 or counsel of any of the parties, nor am I a relative or employee  
17 of any of the parties' attorney or counsel connected with the  
18 action, nor am I financially interested in the action.

19 DATED THIS 3RD DAY OF APRIL, 2001.

20

21

22

23

24

25


  
\_\_\_\_\_  
JANE FAUROT, RPR  
FPSC Division of Records & Reporting  
Chief, Bureau of Reporting  
(850) 413-6732

EXHIBIT No. \_\_\_\_\_

DOCKET NUMBERS: 010102-TP

WITNESS: Stip-1

PARTY: Staff

DESCRIPTION: Official Recognition List

1. Florida Public Service Commission Orders\*
2. FCC Orders & Rules\*
3. Federal Act\*
4. Other Documents\*

\* Too voluminous to duplicate

PROFFERING PARTY: Staff

I.D. # Stip-1

FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET  
NO. 010102-TP EXHIBIT NO. 1  
COMPANY/  
WITNESS: FPSC Staff  
DATE: 3-27-01

**OFFICIAL RECOGNITION LIST**

**Dockets No. 010102-TP**

**Florida Commission Orders**

1. Florida Public Service Commission Order No. PSC-01-0456-PAA-TP, issued February 26, 2001, in Docket No. 010102-TP
2. Florida Public Service Commission Order No. PSC-01-0380-PCO-TP, issued February 14, 2001, and PSC-01-0380A-PCO-TP in Docket No. 010102-TP
3. Florida Public Service Commission Order No. PSC-01-0293-CO-TL, issued February 5, 2001, in Docket No. 990455-TL
4. Florida Public Service Commission Order No. PSC-00-1937-PAA-TL, issued October 20, 2000, in Docket No. 990455-TL
5. Florida Public Service Commission Order No. PSC-00-2055-PAA-TL, issued October 27, 2000, in Docket No. 990455-TL
6. Florida Public Service Commission Order No. PSC-97-0846-FOF-TP, issued July 14, 1997, in Docket No. 960100-TP
7. Florida Public Service Commission Order No. PSC-97-0846A-FOF-TP, issued August 11, 1997, in Docket No. 960100-TP
8. Florida Public Service Commission Order No. PSC-95-0061-FOF-TL, issued January 11, 1995, in Docket No. 940567-TL
9. Florida Public Service Commission Order No. PSC-94-0920-PCO-TL, issued July 27, 1994, in Docket No. 940567-TL
10. Florida Public Service Commission Order No. PSC-94-0572-FOF-TL, issued May 16, 1994, in Docket No. 911034-TL
11. Florida Public Service Commission Order No. PSC-95-0598-PHO-TL, issued May 11, 1995, in Docket No. 941272-TL
12. Florida Public Service Commission Orders No. PSC-98-0812-FOF-TL, issued June 19, 1998, in Docket No. 971058-TL
13. Florida Public Service Commission Order No. PSC-95-1048-FOF-TL, issued August 23, 1995, in Docket No. 941272-TL
14. Florida Public Service Commission Order No. PSC-97-0637-FOF-TL, issued June 3, 1997, in Docket No. 961153-TL
15. Florida Public Service Commission Order No. PSC-97-0138-FOF-TL, issued February 10, 1997, in Docket No. 961153-TL
16. Florida Public Service Commission Order No. PSC-98-0040-FOF-TL, issued January 6, 1998, in Docket No. 971058-TL
17. Florida Public Service Commission Order No. PSC-98-1761-FOF-TL, issued December 29, 1998, in Docket No. 980671-TL
18. Florida Public Service Commission Order No. PSC-99-1066-FOF-TL, issued

19. May 25, 1999, in Docket No. 990223-TL  
Florida Public Service Commission Order No. PSC-99-0606-PCO-TP, issued April 2, 1999, in Docket No. 990373-TP
20. Florida Public Service Commission Order No. PSC-99-1393-S-TP, issued July 20, 1999, in Docket No. 990373-TP
21. Florida Public Service Commission Order No. PSC-97-0846-FOF-TP, issued July 14, 1997, in Docket No. 960100-TP
22. Florida Public Service Commission Order No. PSC-97-0324-FOF-TP, issued March 24, 1997, in Docket No. 960100-TP
23. Florida Public Service Commission Order No. PSC-95-1391-FOF-TL, issued November 8, 1995, in Docket No. 920260-TL
24. Florida Public Service Commission Order No. PSC-99-1891-CO-TL, issued September 23, 1999, in Docket Nos. 870248-TL, 870790-TL, 900039-TL, 910022-TL, 910528-TL, 910529-TL, 911185-TL, 921193-TL, 930173-TL
25. Florida Public Service Commission Order No. PSC-97-0488-FOF-TL, issued April 28, 1997, in Docket No. 951354-TL
26. Florida Public Service Commission Order No. PSC-00-1046-PAA-TP, issued May 30, 2000, in Docket No. 981444-TP
27. Florida Public Service Commission Order No. PSC-00-543-PAA-TP, issued March 16, 2000, in Docket No. 981444-TP

## **FCC Orders and Rules**

1. FCC Orders 99-122, 00-104, 00-429 in CC Docket No. 99-200
2. FCC Orders 95-284, 96-286, 97-74, 97-289, 98-82, 99-19, 99-151, 00-47 in CC Docket No. 95-116
3. FCC Order 99-158, 99-169, 99-374 in CC Docket No. 99-35
4. FCC Order 96-325
5. FCC Orders in CC Docket No. 96-98 and 98-147
6. FCC Order 98-187 in CC Docket No. 98-146

## **Court Decisions**

1. None

## **Federal Act**

1. The Telecommunications Act of 1996

## **Other Documents**

1. 1999 Florida Public Service Commission Comparative Cost Statistics
2. INC Guidelines (<http://www.atis.org/atis/clc/inc/Incdocs.htm>)
3. Florida Area Code and Incumbent Local Exchange Company maps
4. Central Office Code Reclamation and Part 4 Process Updated (including FCC

Process available at

[http://www.nanpa.com/reclamation/fcc\\_reclamation\\_process.html](http://www.nanpa.com/reclamation/fcc_reclamation_process.html)) as of February 26, 2001 (<http://www.nanpa.com/reclamation/coc.html>)

5. 2000 COCUS and NPA Exhaust Analysis (<http://nanpa.planet.net/pdf/1999-cocus.pdf>) and Updated January 15, 2001 COCUS Report ([http://nanpa.planet.net/pdf/011501\\_cocus.pdf](http://nanpa.planet.net/pdf/011501_cocus.pdf))
6. The Commission's March 6, 2001, decision approving the settlement offered in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL. (Order Pending)
7. Architecture and Administrative Plan for Local Number Portability by Hoke R. Knox issued April 23, 1997 for NANC
8. Technical Requirements for Number Portability - Switching Systems ([https://www.atis.org/atis/docstore/doc\\_display.asp?ID=428](https://www.atis.org/atis/docstore/doc_display.asp?ID=428))
9. Florida Rate Center Consolidation Working Group Report, dated September 22, 2000, in Docket No. 981444-TP.

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET

NO. 210102-78 EXHIBIT NO. 2

COMPANY/

WITNESS: FPSC Staff

DATE: 3-27-81



TR Exh # 2

ORIGINAL

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

## -M-E-M-O-R-A-N-D-U-M-

**DATE:** MARCH 30, 2001  
**TO:** DIVISION OF RECORDS AND REPORTING (BAYO)  
**FROM:** DIVISION OF COMPETITIVE SERVICES (ILERI) *χ*  
**RE:** DOCKET NO. 010102-TP - In re: INVESTIGATION OF PROPOSED  
 UPDATES TO THE ROUTING DATA BASE SYSTEM (RBDS) AND  
 BUSINESS RATING INPUT DATABASE SYSTEM (BRIDS) AFFECTING  
 TAMPA TELECOMMUNICATIONS CARRIERS

Please place the following correspondences in the above referenced docket.

- 1) August 15, 2000 letter from Verizon to Tampa Florida Industry Player
- 2) September 12 and 14, 2000 e-mails from Donna McNulty and Frederick C. Gamble of WorldCom to Levent İleri and Lennie Fulwood of the Florida Public Service Commission
- 3) October 23, 2000 letter from Walter D'Haeseleer<sup>1</sup> to Beverly Y. Menard<sup>2</sup>
- 4) October 27, 2000 fax from Beverly Y. Menard to Walter D'Haeseleer
- 5) November 2, 2000 letter from Walter D'Haeseleer to Beverly Y. Menard
- 6) November 8, 2000 letter from Beverly Y. Menard to Walter D'Haeseleer
- 7) November 13, 2000 letter from Karen M. Camechis<sup>3</sup> to Walter D'Haeseleer

<sup>1</sup>Director of Competitive Services Division, Florida Public Service Commission

<sup>2</sup>Advocacy Support, Assistant Vice president, Verizon

<sup>3</sup>Counsel, Time Warner Telcom of Florida, L.P.

DOCUMENT NUMBER-DATE

03991 MAR 30 2001

REC'D - RECORDS/REPORTING

APP  
 CAF  
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 COM  
 CTR  
 ECR  
 LEG  
 OPC  
 PAI  
 RGO  
 SEC  
 SER  
 OTH

DOCKET NO. 010102-TP  
DATE: MARCH 30, 2001

- 8) November 17, 2000 letter from Walter D'Haeseleer to Beverly Y. Menard
- 9) January 24, 2001 e-mail messages from Beverly Y. Menard to Bob Casey of the Florida Public Service Commission
- 10) January 26, 2001 letter from Walter D'Haeseleer to Beverly Y. Menard
- 11) January 26, 2001 letter from Walter D'Haeseleer to Floyd R. Self<sup>4</sup>

If you've any questions, please call me at 413-6562.

LI  
Attachments

cc: Division of Legal Services (L. FORDHAM)

---

<sup>4</sup>Attorney, Messer, Caparello & Self

847 Wed meeting. 9/15/00

INTERCOMPANY CORRESPONDENCE



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  
TEMPLETRRC

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

## Levent Ileri

---

**From:** Donna McNulty [donna.mcnulty@wcom.com]  
**Sent:** Tuesday, September 12, 2000 7:10 PM  
**To:** Levent Ileri; Lennie Fulwood  
**Cc:** donna.mcnulty@wcom.com  
**Subject:** Thursday's meeting

Levent, Lennie,

A call-in number for Thursday's meeting with WorldCom regarding the two issues we discussed earlier today is set forth below:

Date: Thursday, September 14th  
Time: 9:30am Eastern

Call #: 1-888-790-2033

Code: 2251

If you have any questions, please contact me at your convenience.

Donna  
422-1254

## Levent Ileri

---

**From:** Fredrick C. Gamble Mail [Fred.Gamble@wcom.com]  
**Sent:** Thursday, September 14, 2000 9:37 AM  
**To:** Lennie Fulwood  
**Cc:** Levent Ileri  
**Subject:** florida



Untitled Attachment



WorldCom's  
Presentation to the...

**Levent Ileri**

---

**Fredrick C. Gamble**  
**External Numbering Policy Liaison**  
**Phone: 972.656.1475**  
**VNET: 757.1475**  
**Page: 800.PAGE MCI Pin: 5656519**

---

# **WorldCom's Numbering Presentation to the Florida Public Service Commission**



# Agenda

- Issue Summary
- Verizon's Tampa Rate Area Expansion
- Impact to WorldCom
- BellSouth's Motion of Variance
- Conclusion

# Issue Summary

## VERIZON

- Verizon wants to expand the Tampa rate center from 1 rate area to 5.

## BELLSOUTH

- BellSouth wants the Commission to grant a motion of variance to delay its full participation in number pooling in three NPAs

# Verizon's Tampa Rate Area Expansion

- Verizon's letter unilaterally informed the Industry that the Tampa Rate Center would be expanded into five rate centers, effective 02/01/2001.
- All code holders could be impacted.
- WorldCom has a number of NXX codes in the Tampa rate area.
- This could affect up to 10,000 customers per NXX.
- Could also impact customers that have ported to WorldCom.

# Impact to WorldCom

- WorldCom currently treats Tampa as a single rate center.
- Our network was designed to follow the LERG.
- More codes/blocks will be consumed for the additional rate centers.
- Would need to change customer 10 digit numbers where rate center differs from those created.
- Network translations would need to be rebuilt, to accommodate toll calls.
- Sales and services availability databases would need to be updated.
- Business rules will need to be re-defined.

# Impact to WorldCom (Cont.)

- Other Carriers providing service to the Tampa Rate Center could also be affected by Verizon's changes.
- Request the Commission disallow this expansion of rate centers.
- It unnecessarily consumes more numbers, and has not been open for public comment.

# BellSouth's Motion of Variance

- On July 28,2000 BellSouth Filed a motion of variance to delay their participation of Commission Order No. PSC-00-1046-PAA-TP, in areas where BellSouth currently has 1AESS switches that are LNP capable.
- BellSouth states that ten (10) switches are in the three metropolitan statistical areas (MSAs) where the Commission has required number pooling to be implemented by April 2, 2001.
- BellSouth also states that it would not be able to comply with the order until 12/7/2003 in three number pooling NPAs (561, 904, 954) and 7/15/2004 for the Miami MSA.
- BellSouth wants the Commission to allow it to continue to receive numbers in blocks of ten thousands in the affected areas until its switches are replaced, while the rest of the Industry must comply with the order and receive numbers in blocks of one thousand.

# BellSouth Motion of Variance (Cont.)

- BellSouth should expedite the replacement of its switches in the affected areas.
- WorldCom suggests to the Commission that BellSouth should donate its number resources at the same level as the rest of the Industry.
- If the Commission wants to grant the waiver, BellSouth could apply for codes when new numbers are needed, become the LERG assignee, retain 1 block, and return the 9 remaining blocks to the pooling administrator.
- This is the most competitively neutral solution.

# Conclusion

## VERIZON

- WorldCom requests the Commission overturn Verizon's Rate Center Expansion

## BELLSOUTH

- WorldCom requests that the Commission require the aforementioned changes in considering BellSouth's motion.



STATE OF FLORIDA

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

October 23, 2000

Beverly Y. Menard  
c/o David Christian  
106 East College Avenue, Suite 810  
Tallahassee, Florida 32310-7704

Ms. Menard:

On October 9, 2000, staff informally asked Verizon to respond in writing to concerns arising from the impact of Verizon's proposed changes to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS) in the Tampa rate center. If carriers need to obtain additional codes, staff observes that such requests must be made 66 days prior to the date of activation. Due to the required notification interval, staff believes it is necessary to formally request Verizon's position on the following issues:

- Competing carriers believe that traffic currently classified as local would become intraLATA toll. Therefore, CLECs would pay access charges where reciprocal compensation once applied.

Will Verizon's proposed changes affect traffic classification for purposes of inter-carrier compensation and, if so, how?

- Competing carriers believe that they would incur cost to update network translations, sales and services availability databases, and business rules.

Does Verizon's agree? If so, please explain in detail how the cost impact would not be anti-competitive.

- Due to the fact that this Commission is seeking rate center consolidation, it appears that the proposed rate center expansion in the Tampa area would be contradictory to the efforts of number conservation.

What is Verizon's position?

---

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

Following the proposed rate center expansion, will Verizon require carriers to home NPA/NXXs in the other rate centers to access customers in those rate centers? If so, when?

Since you have been aware of many of these concerns since October 9, 2000, I am requesting a written response by October 30, 2000. If you have any questions, please contact Lennie Fulwood at 850.413.6572 or Levent Ileri at 850.413.6562.

Sincerely,



Walter D'Haeseleer

cc: Floyd Self  
Beth Salak  
Cheryl Bulecza-Banks  
Sally Simmons  
Bob Casey  
**Lennie Fulwood**  
~~Levent Ileri~~



FACSIMILE  
TRANSMITTAL  
COVER SHEET

COMMUNICATIONS

2000 F1107 11:21:21

REGULATORY AFFAIRS  
(FLORIDA/GEORGIA)

DATE: 10/27/00

TO: WALTER DIHAESSELER  
LENNIE FULWOOD

LOCATION: \_\_\_\_\_

TEL. NO.: \_\_\_\_\_

FAX. NO.: 850/413-6567  
850/413-6573

FROM: Beverly Y. Menard

LOCATION: Tampa, FL - MC FLTC0616

TEL. NO.: 813/483-2526

FAX.: 813/223-4888

MESSAGE: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NUMBER OF PAGES  
INCLUDING THIS PAGE: 6

Beverly Y. Menard  
Regulatory & Governmental Affairs  
Assistant Vice President (FL/GA)



201 N. Franklin St., FLTC0616  
Tampa, FL 33602-3167

Phone 813.483.2526  
Fax: 813.223.4888  
beverly.menard@verizon.com

October 27, 2000

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

Dear Mr. D'Haeseleer:

In response to your data request of October 23, 2000, Verizon Florida Inc.'s (Verizon) responses are as follows:

1. Competing carriers believe that traffic currently classified as local would become intraLATA toll. Therefore, CLECs would pay access charges where reciprocal compensation once applied.

Will Verizon's proposed changes affect traffic classification for purposes of inter-carrier compensation and, if so, how?

**Response:**

As discussed further below, Verizon believes there should be virtually no differences in traffic classification for compensation purposes. However, this will depend on what the CLEC decides to do. In Verizon's interconnection agreements, local, EAS and ECS traffic are all treated as local service for compensation purposes. In the five Tampa rate centers, all Tampa rate centers are able to call all other Tampa rate centers as a local call. The attached chart shows the central offices and local calling areas for the five rate centers. Today, most of the CLEC's NXXs are considered to be Tampa Central for rating and compensation purposes. The differences in calling areas which could impact compensation are as follows:

- a. If a customer moved from Tampa Central (or Tampa North) to Tampa East, South or West, calls to Dade City and San Antonio (both in Sprint's territory) would become toll calls instead of ECS calls. A review of ECS data only shows a small number of calls from Tampa Central and Tampa North to these exchanges. If a customer is located in the other areas, it is believed that they would have a lower community of interest with these exchanges.
- b. If a customer moved from Tampa Central to Tampa South, calls to Palmetto would become local calls instead of toll calls.

Mr. Walter D'Haeseleer  
October 27, 2000  
Page 2

- c. If a customer moved from Tampa Central to Tampa North or West, calls to New Port Richey would become ECS calls instead of toll calls.
2. Competing carriers believe that they would incur cost to update network translations, sales and services availability databases, and business rules.

Does Verizon agree? If so, please explain in detail how the cost impact would not be anti-competitive.

**Response:**

Verizon does not agree. Carriers should have been following the existing boundaries for the five calling areas for assignment of numbers to insure calls to their customers from Verizon customers are not billed in a manner inconsistent with customer expectations. The five rate areas in Tampa have been explained in numerous industry meetings since the industry started deploying LNP. If carriers have been following the existing boundaries, the formal LERG change to five rate centers should have little or no impact on competing carrier databases (see response to item 3). If the competing carriers have been having difficulty determining the existing rating structure, this change should make it easier to understand and therefore actually facilitate competition. Therefore, Verizon does not believe any of the impacts of this change would be anti-competitive.

There is always a cost of doing business in this industry based upon any routing and rating corrections and changes as displayed in RDBS. All industry participants create changes in their network to accommodate the daily changes in NPA-NXX code activity.

3. Due to the fact that this Commission is seeking rate center consolidation, it appears that the proposed rate center expansion in the Tampa area would be contradictory to the efforts of number conservation.

What is Verizon's position?

**Response:**

Verizon strongly disagrees with the characterization that Verizon is seeking to do a rate center expansion in Tampa. The only thing that is occurring is to have the LERG properly recognize the Tampa rate centers that have been in existence since prior to 1972.

When Verizon was responsible for NXX assignments, discussions were held with carriers to determine which Tampa rate center they wished to obtain. With the move to Neustar, the knowledge level was not maintained or used. Therefore, there have been a lot of workarounds, etc. to try to accommodate this situation. With the change in the LERG, carriers will now have the required information to determine the proper rate centers.

Mr. Walter D'Haeseleer  
October 27, 2000  
Page 3

As part of the Commission's work on rate center consolidation, Verizon looked at the possibility of combining the five Tampa rate centers. However, it was determined that the revenue requirement impact would be too large. Therefore the task force report submitted to the Commission staff on September 28, 2000 only proposed consolidating the Tampa South and Tampa East rate centers. It was proposed to combine the Tampa North rate center and Zephyrhills. The potential revenue requirement that would have to be recovered for the 813 area code for the proposed rate center consolidations was \$6,500,000.

Verizon is very cognizant of the concerns relative to number utilization. As a result, when the industry meetings were held prior to the implementation of this change, NeuStar was involved in the process. There are currently approximately 330 codes still available for assignment in the 813 area code. The current date projected for area code relief in the 813 area code is fourth quarter 2006.

4. Following the proposed rate center expansion, will Verizon require carriers to home NPA/NXXs in the other rate centers to access customers in those rate centers? If so, when?

**Response:**

Verizon Florida has no plans to require the carriers to make any changes. Verizon Florida has no way of knowing where the CLEC's customers are physically located. If the CLECs say that their existing codes are all Tampa Central (some CLECs are already showing the other Tampa rate centers in the LERG), Verizon is aware of two potential problems that may occur:

- a. If a customer wants to leave the CLEC, and they are assigned to a Tampa Central NXX by the CLEC but physically located in another Tampa rate center, Verizon would not be able to port back the customer due to the LNP rules (where are not allowed to go across rate centers). For Verizon to serve the customer, the customer would be required to take a number change.
- b. If a customer is assigned to a Tampa Central NXX but physically located in another Tampa rate center, and desires to get additional lines from the CLEC (who then has NXXs in each Tampa rate center), he may be required to make a number change.

Unfortunately, there has been a lot of misinformation concerned with this proposal. Some CLECs believe that Verizon is impacting the CLEC's local calling area with this change in the LERG. That is not the case. To the best of Verizon's knowledge (which is why the request was made for each CLEC to update the LERG for their own NXX's), most of the CLEC codes have been installed as Tampa Central rate center. This means that the CLEC's customers get the same calling scope as Verizon's Tampa Central rate center customers. Recognizing the Tampa rate centers in the LERG does not change the CLEC's calling scope to 1/5th the calling scope they currently have.

Mr. Walter D'Haeseleer  
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Page 4

There have been a few conference calls with CLECs to discuss this issue. As part of this process, I volunteered to check out addresses where needed to determine the end office that Verizon would use to serve the customer. To date, I have provided this service for five addresses. Verizon has tried to work with the industry to make this move as simple as possible. However, to insure we don't keep exacerbating LNP problems in the future, the LERG must be changed to reflect the actual network that is in place.

If you have any questions or require additional information, please do not hesitate to contact me at (813) 483-2526.

Sincerely,

*Beverly Y. Menard*

Beverly Y. Menard  
Regulatory & Governmental Affairs  
Assistant Vice President

BYM:wjh  
Attachment

c: Mr. Lennie Fulwood

Rate Center	Verizon Central Offices	EAS	ECS
Tampa Central	Alafia Bayshore Beech Park Carrollwood East Hyde Park Tampa Main Seminole Sulphur Springs Sweetwater Temple Terrace University Wallcraft Westside Ybor	Plant City	Clearwater Dade City (Sprint) Mulberry San Antonio (Sprint) St. Petersburg Tarpon Springs Zephyrhills
Tampa East	Brandon Thonotosassa	Plant City	Clearwater Mulberry St. Petersburg Tarpon Springs Zephyrhills
Tampa North	Land O' Lakes Lutz Wesley Chapel	Plant City Zephyrhills	Clearwater Dade City (Sprint) Mulberry New Port Richey San Antonio (Sprint) St. Petersburg Tarpon Springs
Tampa South	Ruskin Wimauma	Palmetto Plant City	Clearwater Mulberry St. Petersburg Tarpon Springs Zephyrhills
Tampa West	Keystone Oldsmar	Clearwater Plant City	Mulberry New Port Richey St. Petersburg Tarpon Springs Zephyrhills

**Note: All Tampa rate centers have local calling to all Tampa rate centers.**



STATE OF FLORIDA

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 2, 2000

Beverly Y. Menard  
c/o David Christian  
106 East College Avenue, Suite 810  
Tallahassee, FL 32301-7704

Dear Mr. Menard:

Thank you for your October 27, 2000, response letter regarding Verizon's proposed changes to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS) in the Tampa rate center. Based on the information you provided, staff believes that it is necessary to formally request Verizon's position on the following issues:

1. a) Please explain why Verizon believes it is necessary to convert the current Tampa rate centers into new Tampa rate centers. Also, explain what has changed since the filing of Verizon's tariff filing with the Florida Public Service Commission (FPSC) and why Verizon did not implement this change at that time.
- b) Please compare and contrast the advantages and disadvantages of the current Tampa rate center structure versus the proposed Tampa rate center structure.
2. Please state how Verizon defines and implements Local Number Portability (LNP).
3. a) Is Verizon LNP capable in the current Tampa rate center? If so, when did Verizon become LNP capable in the current Tampa rate centers?
- b) Will Verizon be LNP capable upon implementing the proposed Tampa rate centers? If not, please explain.
- c) Is it true that the current LNP mechanism will also be applicable in the proposed Tampa rate centers? If not, please explain how the current LNP implementation in will change under the five rate center configuration.

---

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

Ms. Menard  
Page 2  
November 2, 2000

4. Is it true that by implementing thousand-block number pooling and/or individual number porting in the Tampa Metropolitan Statistical Area (MSA), Verizon will allow its customers to port their numbers in the current and proposed Tampa rate centers from any point to any point? If not, please explain and state any exceptions.
5. Please refer to the spreadsheet on Attachment A, and indicate on Column G (Rows 1 through 60) whether number porting is allowed or not under various scenarios as presented. Please use Attachment B as a reference.
6. In the event that the FPSC recommends rate center consolidation, how would this affect the current and proposed Tampa rate center structures.
7. In your October 27, 2000, response letter on page 3, in section 4-a, you stated that "Verizon would not be able to port back the customer due to the LNP rules." Please state and explain the LNP rules, and if necessary, please provide any pertinent documents to support your response.

Since you have been aware of many of these concerns since October 9, 2000, I am requesting a written response by November 9, 2000. In addition, we will discuss these issues with your staff and CLECs on November 13, 2000. If you have any questions, please contact Levent Ileri at (850) 413-6562.

Sincerely,



Walter D'Haeseleer

LI

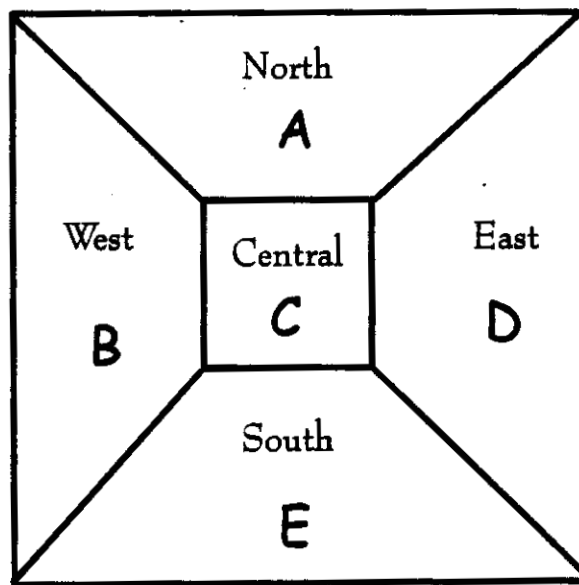
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cc: Floyd Self  
Beth Salak  
Cheryl Bulecza-Banks  
Sally Simmons  
Bob Casey  
Levent Ileri

A	B		C	D	E	F	G
Row Number	Customers' old carrier		Customers' numbers homed at	Customers' new carrier (Verizon or a CLEC) homed at	Customers reside in (i.e., same premises)	Customers move (i.e., new premises)	Is porting allowed? (Yes or No)
	Verizon	CLEC					
31		X	A	A	A		Yes
32		X	A	B	A		No
33		X	A	C	A		No
34		X	A	D	A		No
35		X	A	E	A		No
36		X	C	A	A		No
37		X	C	B	A		No
38		X	C	C	A		Yes
39		X	C	D	A		No
40		X	C	E	A		No
41		X	A	A		within A	Yes
42		X	A	B		within A	No
43		X	A	C		within A	No
44		X	A	D		within A	No
45		X	A	E		within A	No
46		X	C	A		within A	No
47		X	C	B		within A	No
48		X	C	C		within A	No
49		X	C	D		within A	No
50		X	C	E		within A	No
51		X	A	A		within A	Yes
52		X	A	B		from A to B	No
53		X	A	C		from A to C	No
54		X	A	D		from A to D	No
55		X	A	E		from A to E	No
56		X	C	A		within A	No
57		X	C	B		from C to B	No
58		X	C	C		from C to C	Yes
59		X	C	D		from C to D	No
60		X	C	E		from C to E	No

A Row Number	B Customers' old carrier		C Customers' numbers homed at	D Customers' new carrier (Verizon or a CLEC) homed at	E Customers reside in (i.e., same premises)	F Customers move (i.e., new premises)	G Is porting allowed? (Yes or No)
	Verizon	CLEC					
1	X		A	A	A		Yes
2	X		A	B	A		Yes
3	X		A	C	A		Yes
4	X		A	D	A		Yes
5	X		A	E	A		Yes
6	X		C	A	A		N/A
7	X		C	B	A		N/A
8	X		C	C	A		N/A
9	X		C	D	A		N/A
10	X		C	E	A		N/A
11	X		A	A		within A	Yes
12	X		A	B		within A	Yes
13	X		A	C		within A	Yes
14	X		A	D		within A	Yes
15	X		A	E		within A	Yes
16	X		C	A		within A	Yes
17	X		C	B		within A	Yes
18	X		C	C		within A	Yes
19	X		C	D		within A	Yes
20	X		C	E		within A	Yes
21	X		A	A		within A	Yes
22	X		A	B		from A to B	Yes
23	X		A	C		from A to C	Yes
24	X		A	D		from A to D	Yes
25	X		A	E		from A to E	Yes
26	X		C	A		within A	Yes
27	X		C	B		from C to B	Yes
28	X		C	C		from C to C	Yes
29	X		C	D		from C to D	Yes
30	X		C	E		from C to E	Yes

# Proposed Tampa Rate Centers



◆ Beverly Y. Menard  
Regulatory & Governmental Affairs  
Assistant Vice President (FL/GA)



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beverly.menard@verizon.com

November 8, 2000

Mr. Walter D' Haeseleer, Director  
Division of Competitive Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Mr. D'Haeseleer:

**Subject: November 2, 2000 Data Request regarding Verizon's proposed changes to the RDBS and BRIDS in the Tampa Rate Center**

In response to your November 2, 2000 letter, the following are Verizon's positions on the following issues:

**1(a)** Please explain why Verizon believes it is necessary to convert the current Tampa rate centers into new Tampa rate centers. Also, explain what has changed since the filing of Verizon's tariff filing with the Florida Public Service Commission (FPSC) and why Verizon did not implement this change at that time.

**Response:** We are not converting, expanding or changing the currently tariffed Tampa rate center. We are only correcting the RDBS system and its output products to match what currently is reflected within the tariff and the switches as was requested by industry participants. We are eliminating a manual process which existed when GTE was the Florida Code Administrator, that was not continued after the transition of the function to Lockheed-Martin, now Neustar (in 1998).

**1(b)** Please compare and contrast the advantages and disadvantages of the current Tampa rate center structure versus the proposed Tampa rate center structure.

**Response:** As discussed in response 1(a), Verizon is not proposing any changes to the Tampa rate center. The only change is to have the LERG reflect the actual Tampa rate center structure.

**2.** Please state how Verizon defines and implements Local Number Portability(LNP).

**Response:** The 1996 Telecommunications Act defines "number portability" as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another." The First Report

and Order and Further Notice of Proposed Rulemaking (FCC 96-286) established implementation guidelines and timeframes for implementation of LNP in the top 10 MSAs across the United States. Verizon implemented LNP according to these guidelines and completed LNP deployment in all of the top 100 Metropolitan Statistical Areas (MSAs) locations in which we provided service by year end 1998. Verizon chose voluntarily to move beyond the minimum requirements of the FCC order and completed LNP implementation in all of our Florida locations effective August, 1999.

- 3.a.** Is Verizon LNP capable in the current Tampa rate center? If so, when did Verizon become LNP capable in the current Tampa rate centers?

**Response:** As stated in response 2, Verizon is LNP capable in all of our Florida locations. Tampa became LNP capable in September of 1998.

- 3.b.** Will Verizon be LNP capable upon implementing the proposed Tampa rate centers? If not, please explain.

**Response:** Implementation of the LERG change associated with the five Tampa rate centers will not have an impact on Verizon's LNP capability.

- 3.c.** Is it true that the current LNP mechanism will also be applicable in the proposed Tampa rate centers? If not, please explain how the current LNP implementation will change under the five rate center configuration.

**Response:** The changes to the LERG database will have NO impact on the existing Verizon LNP capability.

- 4.** Is it true that by implementing thousand-block number pooling and/or individual number porting in the Tampa MSA, Verizon will allow its customers to port their numbers in the current and proposed Tampa rate centers from any point to any point? If not, please explain and state any exceptions.

**Response:** The implementation of thousand block number pooling will have no impact on Verizon's porting policies. In today's environment, Verizon does NOT port numbers outside of the rate center in which the customer resides. In the five rate centers that exist in the Tampa area, Verizon has not intentionally ported a customer a customer from one rate center to another. As stated in response 2, the Telecommunications Act of 1996 referred to number portability services as the ability "to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another". The FCC has not ordered location portability but most industry participants allow customers to move to new locations within the same rate center.

5. Please refer to the spreadsheet on Attachment A, and indicate on Column G (Rows 1 through 60) whether number porting is allowed or not under various scenarios as presented. Please use Attachment B as a reference.

**Response:** The spreadsheet has been populated as requested. In rows 6-10, a not applicable (N/A) is entered on the sheet because Verizon does not provide its

customers with rate center calling capabilities that differ from their physical location (unless they have established foreign exchange service). In addition, it was assumed for the answers to rows 1-30 Verizon would be porting to a CLEC. For rows 31 – 60, it was assumed that a CLEC would be porting to Verizon in all instances. Porting between CLECs may produce different answers in column G.

**NOTE:** If a customer leaves Verizon and changes to a CLEC (stays in the same location) and chooses to return to Verizon, the customer's number will remain the same. If a customer begins service with a CLEC and then chooses to port to Verizon, a number change will be required in some instances. If the customer's physical location is not the same as the rate center designation for the CLEC that is losing the customer, Verizon will require a number change to port-in the customer.

6. In the event that the FPSC recommends rate center consolidation, how would this affect the current and proposed Tampa rate center structures?

**Response:** Verizon supports rate center consolidation that is revenue neutral. In the case of collapsing the five rate centers around Tampa to one, the impact would be far from neutral. A detailed cost study has not been performed but rough estimates indicate that millions of dollars of loss would be experienced by Verizon if a simple consolidation took place without adjustments to the current tariffed rates.

7. In your October 27, 2000, response letter on page 3, in section 4-a, you stated that "Verizon would not be able to port back the customer due to the LNP rules." Please state and explain the LNP rules, and if necessary, please provide any pertinent documents to support your response.

**Response:** As previously noted in response 2, the FCC referred to number portability in terms of the ability of a customer to move from one provider to another, AT THE SAME LOCATION, without impairment of quality, convenience or reliability. Industry guidelines/rules were developed based on the FCC order. The industry standards developed by T1S1.6 that the vendors utilize for the development of switching software, only applies to porting of customers within rate centers. From the forward of the ATIS Technical Requirements document for Number Portability on Switching (TRQ-2 April 1999): "This document provides the requirements for service provider portability, and location portability within a rate center. Number portability outside a rate center is beyond the scope of this document." Verizon has consistently complied with these guidelines/rules since the first deployment of LNP. The FCC



Mr. Walter D' Haeseller, Director  
November 8, 2000  
Page 4

stated in its First Report and Order and Further Notice of Proposed Rulemaking (paragraph 181) "We decline at this time to require LECs to provide either service or location portability". In addition the FCC states (paragraph 184) "the disadvantages of mandatory location portability outweigh the benefits."

The Final Report & Recommendation dated 4/25/97 (which is located on the NANC web site under documents for LNPA), the Architecture & Administration Plan for Number Portability report paragraph 7.2 states "...location portability is technically limited to rate center/rate district boundaries of the incumbent LEC due to rating/routing concerns."

Sincerely,



Beverly Y. Menard  
Regulatory & Governmental Affairs  
Assistant Vice President

BYM:wjh

c: Levent Ileri

A	B		C	D	E	F	G
Row Number	Customers' old carrier		Customers' numbers homed at	Customers' new carrier (Verizon or a CLEC) homed at	Customers reside in (i.e., same premises)	Customers move (i.e., new premises)	Is porting allowed? (Yes or No)
	Verizon	CLEC					
31		X	A	A	A		
32		X	A	B	A		
33		X	A	C	A		
34		X	A	D	A		
35		X	A	E	A		
36		X	C	A	A		
37		X	C	B	A		
38		X	C	C	A		
39		X	C	D	A		
40		X	C	E	A		
41		X	A	A		within A	
42		X	A	B		within A	
43		X	A	C		within A	
44		X	A	D		within A	
45		X	A	E		within A	
46		X	C	A		within A	
47		X	C	B		within A	
48		X	C	C		within A	
49		X	C	D		within A	
50		X	C	E		within A	
51		X	A	A		within A	
52		X	A	B		from A to B	
53		X	A	C		from A to C	
54		X	A	D		from A to D	
55		X	A	E		from A to E	
56		X	C	A		within A	
57		X	C	B		from C to B	
58		X	C	C		from C to C	
59		X	C	D		from C to D	
60		X	C	E		from C to E	

A	B		C	D	E	F	G
Row Number	Customers' old carrier		Customers' numbers homed at	Customers' new carrier (Verizon or a CLEC) homed at	Customers reside in (i.e., same premises)	Customers move (i.e., new premises)	Is porting allowed? (Yes or No)
	Verizon	CLEC					
1	X		A	A	A		
2	X		A	B	A		
3	X		A	C	A		
4	X		A	D	A		
5	X		A	E	A		
6	X		C	A	A		
7	X		C	B	A		
8	X		C	C	A		
9	X		C	D	A		
10	X		C	E	A		
11	X		A	A		within A	
12	X		A	B		within A	
13	X		A	C		within A	
14	X		A	D		within A	
15	X		A	E		within A	
16	X		C	A		within A	
17	X		C	B		within A	
18	X		C	C		within A	
19	X		C	D		within A	
20	X		C	E		within A	
21	X		A	A		within A	
22	X		A	B		from A to B	
23	X		A	C		from A to C	
24	X		A	D		from A to D	
25	X		A	E		from A to E	
26	X		C	A		within A	
27	X		C	B		from C to B	
28	X		C	C		from C to C	
29	X		C	D		from C to D	
30	X		C	E		from C to E	

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REPLY TO:  
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TALLAHASSEE, FL 32302-2095

November 13, 2000

Walter D'Haeseleer, Director  
Division of Competitive Services  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**RE: Verizon Tampa Rate Center Updates**

Dear Mr. D'Haeseleer,

I am writing on behalf of Time Warner Telecom of Florida, L.P. to advise you of our concerns regarding the proposed Verizon (f/n/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 either prepare for this change or to seek additional relief 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 there 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 ALEC community have not yet been fully identified, let alone their impacts fully 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 to assistance to the carriers. Verizon has been very cooperative, and its assistance has been appreciated by the ALECS, but Verizon believes that it must proceed with this change on the current schedule.

Walter D'Haeseleer, Director  
November 13, 2000  
Page Two

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

First, the proposed change may require the ALECs to obtain additional NXX codes in the 813 NPA in order to be able to serve customers from the appropriate rate centers. 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 some customers may have to change telephone numbers, as their current telephone numbers are assigned out of the Tampa Central rate center when in fact the customer needs 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. Indeed, we 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 change 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 this proposal as a step away from rate center consolidation, which many see as having to then be reversed again when rate center consolidation is later implemented for Tampa. 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.

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.

Walter D'Haeseleer, Director  
November 13, 2000  
Page Three

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 ALEC's need to have their analysis completed no later than November 15<sup>th</sup> 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 as Verizon has requested and obtaining new NXX codes or to seeking alternative relief from this Commission. In any situation, it is critical to Verizon that if there is going to be a delay in the February 1<sup>st</sup> 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 request 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 15<sup>th</sup> deadline. However, Verizon has indicated to us that it would be willing to delay the February 1<sup>st</sup> date upon a written request from the appropriate Commission Staff person in lieu of formal Commission action.

Pursuant to §364.183(1), F.S., and Rule 22.006(5), F.A.C., Time Warner Telecom requests confidential treatment of the information contained in the attached matrix. These responses are considered proprietary confidential business information, as that term is defined in §364.183(3), F.S., thus exempt from §119.07(1) and §24(a), Art. I of the State Constitution. The information is a trade secret and relates to competitive interests, the disclosure of which would impair the competitive business of Time Warner Telecom. Additionally, the information is intended to be private, and has not been otherwise disclosed by Time Warner Telecom.

In accordance with Rule 22.006(5), F.A.C., I have enclosed one copy of the matrix with the confidential information highlighted in yellow, and two redacted copies.

Walter D'Haeseleer, Director  
November 13, 2000  
Page Four

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,



Karen M. Camechis  
Counsel for Time Warner Telecom of Florida, L.P.

cc: Diana Caldwell, Esq.

STATE OF FLORIDA

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,

  
Walter D'Haeseleer  
Director

WD/rc

cc: Division of Competitive Services (B Salak, C. Bulecza-Banks, S. Simmons, D. Dowds, B. Casey, 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.

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

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FSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)



## Bob Casey

---

**From:** beverly.menard@verizon.com  
**Sent:** Wednesday, January 24, 2001 1:24 PM  
**To:** bcasey@psc.state.fl.us  
**Cc:** bev%rga.indaf%fltpa@telops.gte.com  
**Subject:** fwd: Tampa Rate Center 05/17 Conference Call Minutes

TAMPA RC CONF  
CALL 05-17-00.DO...

Thanks,  
Bev Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)  
----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:16 PM:  
To: Beverly Menard@RGA.INDAF@FLTPA

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com  
-----

From: "Patti Gasper" <patti.gasper@gte.com>, on 5/23/00 11:54 AM:  
To: smtp["Mary Ann Southard" <msouthar@telcordia.com>], smtp["Edgar R. Rodriguez" <erodrigu@telcordia.com>], smtp["Murray, Melissa" <mmurra@knc telecom.com>], smtp["cecilia.louie" <cecilia.louie@neustar.com>], smtp["asulliva" <asulliva@notes.cc.telcordia.com>], smtp["sheri.pressler" <sheri.pressler@gte.com>], smtp["patti.gasper" <patti.gasper@gte.com>], smtp["maryann.palmisano" <maryann.palmisano@bridge.bellsouth>], smtp["Khoffman" <Khoffman@jsitel.com>], smtp["barbara.green" <barbara.green@mail.sprint.com>], smtp["samuel.raymundo" <samuel.raymundo@attws.com>], smtp["Elaine.deese" <Elaine.deese@alltel.com>], smtp["dlj" <dlj@tp0054.tmrfl.tel.gte.com>], smtp["harriet.eudy" <harriet.eudy@alltel.com>], smtp["Lamb, Joel" <Joel.Lamb@gte.com>], smtp["Burt, Holli" <Holli.Burt@gte.com>], Janice Goebel@CNO.SVCFLFMT.B@TXIRV, Reggie Sitze@EUB.BILLTBL@FLTPA, Barbara Heishman@EUB.BILLTBL@FLTPA, Harry Sadler@NOS.REGOPSFL@FLTPA, Nanette Duval@CO.DBM@INFTW, Donna Edwards@CO.DBA.NFRB@FLTPA, Beverly Menard@RGA.INDAF@FLTPA

All,

Attached are the minutes from the 04/19/00 conference call regarding the proposed move of the Tampa, FL rate center. Please review the minutes and advise if additions or corrections are necessary.

Thank you,

Patti Gasper

219-461-2458  
patti.gasper@gte.com

Wednesday  
04/19/00 1:00 CST  
Tampa Rate Center Conference Call

## MINUTES

### Attendees:

#### GTE

Sheri Pressler  
Patti Gasper  
Joel Lamb  
Nanette Duval  
Janice Goebel  
Reggie Sitze

#### GTE Wireless

Debbie Ruffin

#### Telcordia

Mary Ann Southard  
Ed Rodriguez  
Ann Sullivan

#### Bell South

Mary Ann Palmisano

#### Sprint

Barb Green

#### NeuStar

Cecilia Louie

#### Alltel

Elaine Diaz

#### KMC

Melissa Murray

### Review:

Currently although the Tampa, FL area is tariffed for 5 different rate center locations (North, South, East, West & Central) only a distinction known as "Tampa" is being utilized.

### Proposal:

Splitting the existing Tampa Rate Center into the 5 geographic rate center areas to match the tariff.

### Discussion:

Telcordia; The current NPA's impacted would be 813,863 and 941.

Bell South; suggested coordination with PUC and network design to change existing phone numbers as was implemented when they created "theoretical Rate Centers" in the Durham/Research Triangle Park, NC area.

GTE Wireless; Advised they will be heavily impacted by this change and requested that existing codes be assigned to Tampa Central. New telephone numbers could be created/moved for remaining rate centers or moved to new rate centers if needed.

NeuStar; Confirms 90 Days notice will be required for implementation.

GTE Wireless; Voiced concern over division of localities among rate centers. This will be determined by Industry Relations.

**Needs:**

Locations, Florida Map, Vertical & Horizontal Coordinates (V&H) Effective Date, Industry Notification

Telcordia; Total NXX's=387 Active, 391 Total (225 Non-GTE). 43 OCN's only 4 which have more than 10 codes.

**Assignments:**

Telcordia – V&H Coordinates and associated locations.

GTE – Initial contact with Florida Public Service Commission via internal Regulatory Affairs & Industry Relations. Copy of existing tariff to all attendees.

NeuStar – Will accept 90 days before implementation, one Part 1 COCAG form with list of codes attached, per Rate Center, per OCN.


**Next Call Scheduled:**

Wednesday May 17, 2000 at 1:00 p.m. CST for 2 hours.  
Conference Bridge # 813-277-3200 #6078

## Bob Casey

---

**From:** beverly.menard@verizon.com  
**Sent:** Wednesday, January 24, 2001 1:25 PM  
**To:** bcasey@psc.state.fl.us  
**Cc:** bev%rga.indaf%fltpa@telops.gte.com  
**Subject:** fwd: Tampa Rate Center

  
FL VERIZON.DOC

Thanks,  
Bev Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)  
----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:18 PM:  
To: Beverly Menard@RG.A.INDAF@FLTPA

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com  
-----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 8/17/00 9:15 AM:

To:  
smtp[charlotte\_piper@bscc.bls.com], smtp[cheryl.kizzee@wcom.com], smtp[DRuffin@mobilnet.gte.com], smtp[GAMore@2c2.com], smtp[Gina.Latini@btitele.com], smtp[Kathryn.Barrett@Nextel.com], smtp[khutchison@att.com], smtp[sgever01@sprintspectrum.com], smtp[shirley.paswaters@level3.com], smtp[susan\_ciccotta@frontiercorp.com], smtp[teresa.newkirk@twtwlwcom.com], smtp[timothyb@att.com]  
Cc:  
smtp[elaine.deese@alltel.com], smtp[Khoffman@jsitel.com], smtp[maryann.palmisano@bridge.bellsouth.com], smtp[mmurra@kmctelecom.com], smtp[msouhar@telcordia.com], smtp[samuel.raymundo@attws.com]

Folks,

Attached is official notification of critical changes that are scheduled with regards to the Tampa, Florida area. Please relay this information to all within your organization, who may have impacts.

Janice M. Goebel  
Staff Specialist - Service Activation  
VERIZON (f.k.a. GTE)

INTERCOMPANY CORRESPONDENCE



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	
			TEMPLETARC	

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

## Bob Casey

---

**From:** beverly.menard@verizon.com  
**Sent:** Wednesday, January 24, 2001 1:25 PM  
**o:** bcasey@psc.state.fl.us  
**Cc:** bev%rga.indaf%fltpa@telops.gte.com  
**Subject:** fwd: Tampa Rate Center 06/28 Conference Call Minutes

  
TAMPA RC CONF  
CALL 06-28-00.DO...

Thanks,  
Bev Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)  
----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:18 PM:  
To: Beverly Menard@RGA.INDAF@FLTPA

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com  
-----

From: "Patti Gasper" <patti.gasper@bdi.gte.com>, on 7/7/00 4:50 PM:  
To: smtp["Murray, Melissa" <mmurra@kmctelecom.com>], smtp["cecilia.louie" <cecilia.louie@neustar.com>], smtp["maryann.palmisano" <maryann.palmisano@bridge.bellsouth>], smtp["Edgar R. Rodriguez" <erodrigu@telcordia.com>], smtp["Mary Ann Southard" <msouthar@telcordia.com>], smtp["Barbara.Green" <Barbara.Green@mail.sprint.com>], smtp["Duval, Nannette" <Nannette.Duval@GTE.COM>], smtp["samuel.raymundo" <samuel.raymundo@attws.com>], smtp["asulliva" <asulliva@notes.cc.telcordia.com>], smtp["Sheri Pressler" <smpp@fwin88.ftwyin.tel.gte.com>], smtp["Patti Gasper" <psg@fwin90.ftwyin.tel.gte.com>], smtp["Khoffman" <Khoffman@jsitel.com>], smtp["Elaine.deese" <Elaine.deese@alltel.com>], smtp["Dawn Johnson" <dlj@tp0054.tmrfl.tel.gte.com>], smtp["harriet.eudy" <harriet.eudy@alltel.com>], smtp["Joel Lamb" <jal@fwin86.ftwyin.tel.gte.com>], smtp["Burt, Holli" <Holli.Burt@GTE.COM>], smtp["Donna.Edwards@gte.com" <Donna.Edwards@GTE.COM>], Janice Goebel@CNO.SVCFLFMT.B@TXIRV, Reggie Sitze@EUB.BILLTBL@FLTPA

All,

The next Tampa Rate Center conference call is scheduled for 08-09-00 at 1:00 CST  
972-659-6444 (6078#)

Attached are the minutes from the 06/28/00 conference call regarding the proposed move of the Tampa, FL rate center. Please review the minutes



and advise if additions or corrections are necessary.

Thank you,

Patti Gasper

Patti Gasper  
GTE - RDBS Administration  
219-461-2458  
patti.gasper@bdi.gte.com

Wednesday  
06/28/00 1:00 CST  
Tampa Rate Center Conference Call

## MINUTES

### Attendees:

#### GTE

Sheri Pressler  
Patti Gasper  
Joel Lamb  
Janice Goebel  
Dawn Johnson  
Cathy Finney  
Chanda Cave

#### GTE Wireless

Telcordia  
Mary Ann Southard  
Ed Rodriguez

#### Bell South

Sprint  
Barb Green

#### NeuStar

Alltel  
Harriet Eudy  
Elaine Deese

#### KMC

### Review:

The Tampa, FL area is tariffed for 5 different rate center locations (North, South, East, West & Central) although only a distinction known as "Tampa" is being utilized today.

### Proposal:

Splitting of the existing Tampa Rate Center into the 5 geographic rate center areas to match the tariff.

### Notes:

Clarification of GTE Tariff pg. 14 note 1 for Bell South (Mary Ann) was emailed to all on 05/25/00.

Only one NPA (813) will be involved in this rate center change.

The existing tariff will not be changed to reflect Tampa Central as Tampa, but rather 5 new rate centers will be created in RDBS for use by the industry.

**Discussion:**

Effective date – The effective date of February 1, 2001 (02/01/01) was proposed and accepted.

Localities - Telcordia (Mary Ann) advised that 30 Localities exist today, 4 are already identified as N, S, E & W (assuming North, South, East & West). These localities will be moved to the new rate centers and will not be deleted from RDBS. Mary Ann suggested retaining these localities for operator use or other services, and Ed (Rodriguez) added 'companies often know localities but not rate centers.'

Sprint (Barb Green) questioned responsibility for NXX screen updates. Telcordia will handle this according to the tariff.

**Notification:**

GTE Regulatory (Beverly Menard) has notified the Florida Public Service Commission.

GTE will internally provide Customer Bill Inserts and notice to GTE Directories by October, 2000.

External customer notice will be the responsibility of each company impacted by the change.

**Needs:**

Maps – Specific address maps as suggested by Bell South (Mary Ann) were not attainable. However, boundary maps to determine individual NXX's are being sought.

**Assignments:**

GTE will match localities to rate centers advising results during next scheduled call.

GTE (Janice Goebel) will notify the industry (all OCN's) before implementation.

\*NeuStar will verify use of the Document Distribution Service on the NANPA Website.

\*NeuStar (Cecilia) advised Part 1 COCAG forms should be received 66 days in advance of effective date. (This would be no later than 11-27-2000.)

GTE Tariffs will supply boundary maps and actual rate center name for OCN use to determine NXX's impacted and aid in Part 1 Form completion.

GTE will notify their internal project manager of this pending update.

**Commitments:**

NXX's updated in RDBS will be the responsibility of each AOCN.

Trouble Reporting – Will be directed through existing channels as normal business activity. Carriers may submit their own Trouble Reporting Number if deemed necessary.

Telcordia will build new localities and rate centers based on the 02/01/01 effective date. The current Tampa Rate Center will not be deleted until all customers have been moved.

NeuStar (Cecilia) will publish information through their Document Distribution Service at the NANPA Website.

**Next Call Scheduled:**

Wednesday | August 9, 2000 at 1:00 p.m. CST for 2 hours.

Conference Bridge #: 972-659-6444 #6078

\* Remaining from 05/17/00 call.

**Bob Casey**

---

**From:** beverly.menard@verizon.com  
**Sent:** Wednesday, January 24, 2001 1:24 PM  
**To:** bcasey@psc.state.fl.us  
**Cc:** bev%rga.indaf%fltpa@telops.gte.com  
**Subject:** fwd: Tampa Rate Center Conference Call 5/28/00

TAMPA\_RC\_CONF\_C  
ALL\_05-17-00.DO...

SHERI.PRESSLER.VC  
P

Thanks,  
Bev Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)  
----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:17 PM:  
To: Beverly Menard@RGA.INDAF@FLTPA

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com

-----  
From: "Sheri M. Pressler" <sheri.pressler@gte.com>, on 6/27/00 9:55 AM:  
To: smtp["Patti Gasper" <patti.gasper@gte.com>]  
Cc: smtp["Mary Ann Southard" <msouthar@telcordia.com>], smtp["Edgar R. Rodriguez" <erodrigu@telcordia.com>], smtp["Murray, Melissa" <mmurra@kmctelecom.com>], smtp["cecilia.louie" <cecilia.louie@neustar.com>], smtp["asulliva" <asulliva@notes.cc.telcordia.com>], smtp["maryann.palmisano" <maryann.palmisano@bridge.bellsouth>], smtp["Khoffman" <Khoffman@jsitel.com>], smtp["barbara.green" <barbara.green@mail.sprint.com>], smtp["samuel.raymundo" <samuel.raymundo@attws.com>], smtp["Elaine.deese" <Elaine.deese@alltel.com>], smtp["dlj" <dlj@tp0054.tmtrf1.tel.gte.com>], smtp["harriet.eduy" <harriet.eduy@alltel.com>], smtp["Lamb, Joel" <Joel.Lamb@gte.com>], smtp["Burt, Holli" <Holli.Burt@gte.com>], Janice Goebel@CNO.SVCFLFMT.B@TXIRV, Reggie Sitze@EUB.BILLTBL@FLTPA, Barbara Heishman@EUB.BILLTBL@FLTPA, Harry Sadler@NOS.REGOPSF@FLTPA, Nanette Duval@CO.DBM@INFTW, Donna Edwards@CO.DBA.NLKS@FLTPA, Beverly Menard@RGA.INDAF@FLTPA

\*\*\*\*\*Reminder\*\*\*\*\*

All,

I have scheduled a conference call for June 28,th at 1:00 pm CST to discuss issues involving the break out of the Tampa Rate Centers to atch the Tariff. Please plan to attend and share your expertise.

Attached are the minutes from the last conference call.

The call in number is 813/277-3200 pass code 6078#.

This conference bridge has been reserved for 2 hours.

Sheri M. Pressler : )  
Specialist RDBS/DBM - GTE  
Office: 219/461-3475  
Fax: 219/461-3472  
Pager: 888/755-6495

Wednesday  
05/17/00 1:00 CST  
Tampa Rate Center Conference Call

## MINUTES

### Attendees:

#### GTE

Sheri Pressler  
Patti Gasper  
Joel Lamb  
Janice Goebel  
Dawn Johnson

#### GTE Wireless

#### Telcordia

Mary Ann Southard  
Ann Sullivan

#### Bell South

Mary Ann Palmisano

#### Sprint

Barb Green

#### NeuStar

Cecilia Louie  
Staff - (Andrea, Terra, Margaret)

#### Alltel

Harriet Eudy  
Elaine Diaz

#### KMC

### Review:

The Tampa, FL area is tariffed for 5 different rate center locations (North, South, East, West & Central) although only a distinction known as "Tampa" is being utilized.

### Proposal:

Splitting of the existing Tampa Rate Center into the 5 geographic rate center areas to match the tariff.

### Note:

NXX's updated in RDBS will be the responsibility of each AOCN.

**Trouble Reporting** – Will be directed through existing channels as normal business activity. Carriers may submit their own Trouble Reporting Number if deemed necessary.

**Post-Transfer;** NeuStar will notify all carriers that rate center "Tampa" is now 5 areas and NXX owner must choose new rate center.

**Telcordia (Mary Ann);** The current Tampa Rate Center will not be deleted until all customers have been moved.

**Assignments:**

All – Please be prepared to determine an effective date.

GTE will contact their Florida Product Management Group for specific address maps and advise on regulatory and industry notification.

NeuStar will verify use of the Document Distribution Service on the NANPA Website.

GTE will contact their Tariff Group for clarification of Tariff pg.14 note 1 for Bell South (Mary Ann).

NeuStar (Cecilia) advised Part 1 COCAG forms should be received 66 days in advance of effective date.

GTE will contact Telcordia (Mary Ann) to confirm existing Localities with NXX's.


**Next Call Scheduled:**

Wednesday June 28, 2000 at 1:00 p.m. CST for 2 hours.  
Conference Bridge # 813-277-3200 #6078



**Bob Casey**

**From:** beverly.menard@verizon.com  
**Sent:** Wednesday, January 24, 2001 1:22 PM  
**To:** bcasey@psc.state.fl.us  
**Cc:** bev%rga.indaf%fltpa@telops.gte.com  
**Subject:** fwd: Tampa Rate Center 04/19 Conference Call Minutes

  
TAMPA RC CONF  
CALL 04-19-00.DO... Bob,

Per your request, I will be forwarding a series of emails to you as Telecordia was a recipient of these emails.

Thanks,  
Bev. Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)  
----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:15 PM:  
To: Beverly Menard@RGA.INDAF@FLTPA

I will forward all of the email I have including the meeting minutes.

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com  
-----

From: "Patti Gasper" <patti.gasper@gte.com>, on 4/24/00 2:24 PM:  
To:  
smtp[<erodrigu@telcordia.com>], smtp[<cecilia.louie@neustar.com>], smtp["S  
heri Pressler" <smp@fwin88.ftwyin.tel.gte.com>]  
Cc:  
smtp[<mmurra@kmctelecom.com>], smtp[<msouthar@telcordia.com>], smtp[<marya  
nn.palmisano@bridge.bellsouth.com>], smtp[<Khoffman@jsitel.com>], smtp[<ba  
rbara.green@mail.sprint.com>], smtp[<asulliva@notes.cc.telcordia.com>], sm  
tp[<MHall@mobilnet.gte.com>], smtp[<elaine.deese@alltel.com>], smtp["Nanne  
tte Duval" <nld@fwin85.ftwyin.tel.gte.com>], smtp["Joel Lamb"  
<jal@fwin86.ftwyin.tel.gte.com>], Janice  
Goebel@CNO.SVCFLFMT.B@TXIRV, Reggie Sitze@EUB.BILLTBL@FLTPA, Barbara  
Heishman@EUB.BILLTBL@FLTPA

All,

Attached are the minutes from the 04/19/00 conference call regarding the proposed move of the Tampa, FL rate center. Please review the minutes and advise if additions or corrections are necessary.

Thank you,

Patti Gasper

Patti Gasper  
GTE - RDBS Administration

Patti Gasper  
GTE - RDBS Administration  
219-461-2458  
patti.gasper@gte.com

Wednesday  
05/17/00 1:00 CST  
Tampa Rate Center Conference Call

## MINUTES

### Attendees:

#### GTE

Sheri Pressler  
Patti Gasper  
Joel Lamb  
Janice Goebel  
Dawn Johnson

#### GTE Wireless

#### Telcordia

Mary Ann Southard  
Ann Sullivan

#### Bell South

Mary Ann Palmisano

#### Sprint

Barb Green

#### NeuStar

Cecilia Louie  
Staff - (Andrea, Terra, Margaret)

#### Alltel

Harriet Eudy  
Elaine Diaz

#### KMC

### Review:

The Tampa, FL area is tariffed for 5 different rate center locations (North, South, East, West & Central) although only a distinction known as "Tampa" is being utilized.

### Proposal:

Splitting of the existing Tampa Rate Center into the 5 geographic rate center areas to match the tariff.

### Note:

NXX's updated in RDBS will be the responsibility of each AOCN.

**Trouble Reporting** – Will be directed through existing channels as normal business activity. Carriers may submit their own Trouble Reporting Number if deemed necessary.

**Post-Transfer;** NeuStar will notify all carriers that rate center "Tampa" is now 5 areas and NXX owner must choose new rate center.

**Telcordia (Mary Ann);** The current Tampa Rate Center will not be deleted until all customers have been moved.

**Discussion:**

Tariff - Bell South (Mary Ann) would appreciate a GTE clarification of Tariff pg.14 note 1.

Localities - Telcordia (Mary Ann) advised that 30 Localities exist today, 4 are already identified as N, S, E & W (assuming North, South, East & West). These localities will be moved to the new rate centers

Codes impacted – not known yet. However, NeuStar (Cecilia) advised 331 codes are still available to be assigned.

Effective date - Telcordia (Mary Ann) reminded attendees of 6-month industry standard interval. NeuStar (Cecilia) Concurred 6-month standard interval; dependent upon carrier submission.

**Notification:**

Beverly Menard, GTE Regulatory, will notify the Florida Public Service Commission.

NeuStar (Cecilia) offered to publish information through their Document Distribution Service at the NANPA Website.

GTE (Janice) suggested Florida's Product Management Group should be able to notify regulatory and other departments for industry notification

NeuStar – For AOCN's with multiple OCN's; NeuStar will accept 90 days before implementation, one Part 1 COCAG form with list of codes attached, per Rate Center, per OCN.

**Needs:**

Consensus on Effective Date

Consensus on Customer Notification

Removal of Localities without NXX's assigned.

Bell South (Mary Ann) suggested maps showing engineering and base rate areas may be provided by service order groups. These maps should identify street addresses to work with Tariff pg. 74.

New Localities and Rate Centers - will be built by Telcordia once effective date is established.

**Assignments:**

All – Please be prepared to determine an effective date.

GTE will contact their Florida Product Management Group for specific address maps and advise on regulatory and industry notification.

NeuStar will verify use of the Document Distribution Service on the NANPA Website.

GTE will contact their Tariff Group for clarification of Tariff pg.14 note 1 for Bell South (Mary Ann).

NeuStar (Cecilia) advised Part 1 COCAG forms should be received 66 days in advance of effective date.

GTE will contact Telcordia (Mary Ann) to confirm existing Localities with NXX's.

**Next Call Scheduled:**

Wednesday June 28, 2000 at 1:00 p.m. CST for 2 hours.  
Conference Bridge # 813-277-3200 #6078

## Bob Casey

---

From: beverly.menard@verizon.com  
Sent: Wednesday, January 24, 2001 1:24 PM  
o: bcasey@psc.state.fl.us  
Cc: bev%rga.indaf%fttpa@telops.gte.com  
Subject: fwd: Tampa Rate Center Conference Call 5/17/00



Thanks,  
Bev Menard  
NEW PHONE NOS.  
(813) 483-2514 (phone)  
(813) 273-0637 (fax)

----- Original Text -----

From: Janice Goebel@CNO.SVCFLFMT.B@TXIRV, on 1/24/01 1:16 PM:  
To: Beverly Menard@RGA.INDAF@FLTPA

Janice M. Goebel - Specialist  
Verizon Network Operations  
Process Assurance - NOTD Staff Support  
phone 972-718-7939  
pager 888-408-9601  
MC: HQB11A06  
janice.goebel@verizon.com

-----  
From: "Sheri M. Pressler" <sheri.pressler@gte.com>, on 5/16/00 4:10 PM:  
To: smtp["Murray, Melissa" <mmurra@knctelecom.com>], smtp["Mary Ann H  
Southard" <msouthar@telcordia.com>], smtp["Edgar R. Rodriguez"  
<erodrigu@telcordia.com>], smtp["Nannette Duval"  
<nld@fwin85.ftwyin.tel.gte.com>], smtp["Joel Lamb"  
<jal@fwin86.ftwyin.tel.gte.com>], smtp["Patti Gasper"  
<psg@fwin90.ftwyin.tel.gte.com>], smtp["Maryann Palmisano"  
<maryann.palmisano@bridge.bellsouth>], smtp["Sheri Pressler"  
<sheri.pressler@gte.com>], smtp["Khoffman"  
<Khoffman@jsitel.com>], smtp["Cecilia Louie"  
<cecilia.louie@neustar.com>], smtp["Barbara Green"  
<barbara.green@mail.sprint.com>], smtp["Asulliva"  
<asulliva@notes.cc.telcordia.com>], smtp["Samuel Raymundo"  
<samuel.raymundo@attws.com>], smtp["Elaine Deese"  
<Elaine.deese@alltel.com>], smtp["Dawn Johnson"  
<dlj@tp0054.tmtrfl.tel.gte.com>], smtp["Holli Burt"  
<hlb@tp0007.tmtrfl.tel.gte.com>], smtp["Donna Edwards"  
<die@tp0027.tmtrfl.tel.gte.com>], Janice  
Goebel@CNO.SVCFLFMT.B@TXIRV, Reggie Sitze@EUB.BILLTBL@FLTPA, Barbara  
Heishman@EUB.BILLTBL@FLTPA

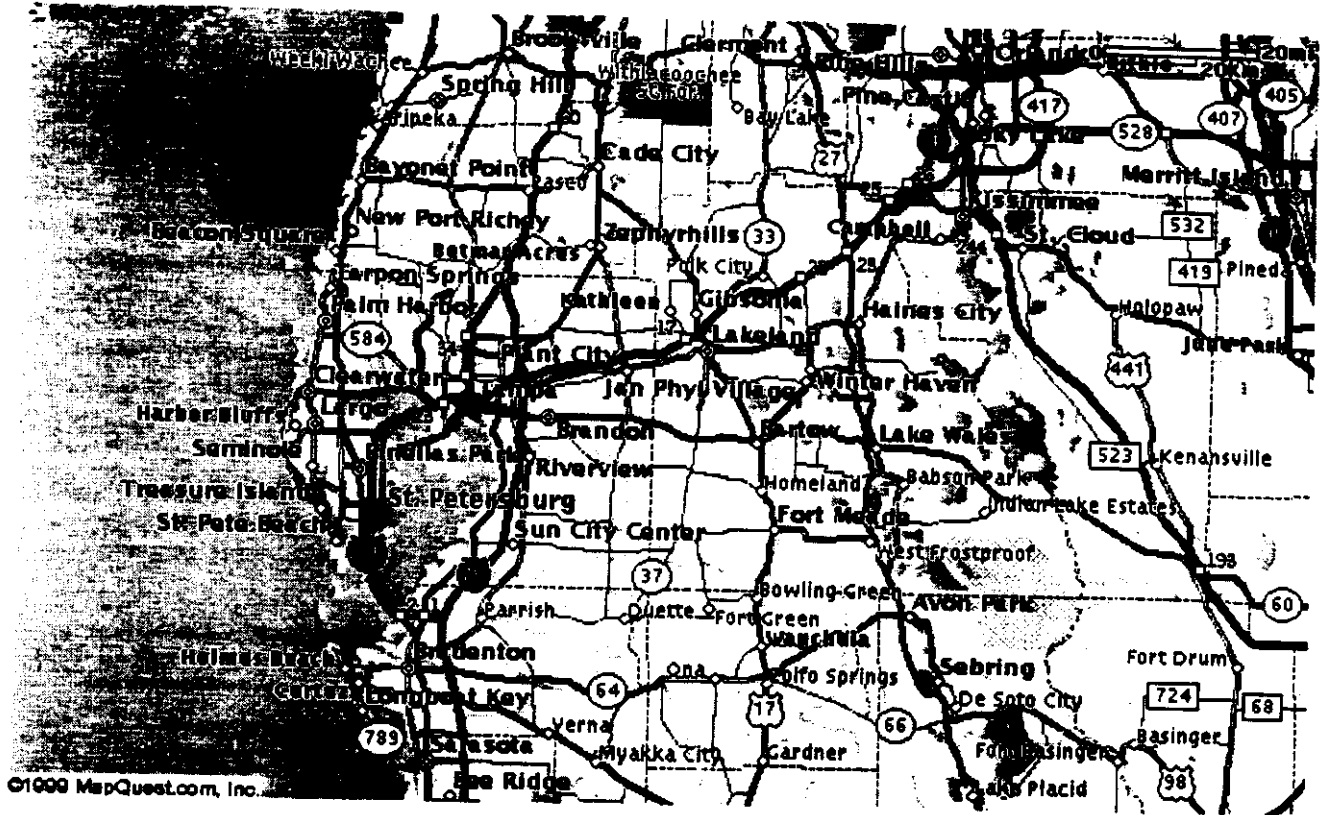
All,

Just a reminder the conference call is tomorrow.

Wednesday May 17, 2000 at 1:00 p.m. CST for 2 hours. Conference  
bridge number is  
13-277-3200 6078#

I have attached a map of Florida for your viewing pleasure.

Sheri M. Pressler : )  
Specialist RDBS/DBM - GTE  
Office: 219/461-3475  
Fax: 219/461-3472  
Pager: 888/755-6495





# **TAMPA RATE CENTER BREAK-OUT**

## **Conference Call Schedule**

**Wednesday May 17, 2000 at 1:00 p.m. CST for 2 hours  
Conference Bridge # 813-277-3200 6078#**

1. Review assigned action items.
  - a. Telcordia - V&H Coordinates and associated locations.
  - b. GTE - Initial contact with Florida Public Service Commission via internal Regulatory Affairs & Industry Relations. Provide copy of existing tariff to all attendees.
  - c. NeuStar will accept one Part 1 COCAG form with list of codes attached, per Rate Center, per OCN.
  
2. Expectations of Conference Call
  - a. Date new Rate Centers will become effective.
  - b. Date part 1 COCAG forms need submitted to NeuStar.
  - c. Who and how the Industry will be notified.
  - d. Determine which localities will be impacted.
  - e. How the NXX's will be updated in the LERG.
  
3. Discussion Items
  - a. How many codes are effected.
  - b. Trouble reporting.
  - c. NPA exhaustion/jeopardy.
  
4. Date & time for next conference call.

STATE OF FLORIDA

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



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

**Public Service Commission**

January 26, 2001

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

VIA FACSIMILE

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

Dear Ms. Menard:

Having reviewed your January 24, 2001 letter regarding the Tampa rate center database updates, I have concluded that this issue should be addressed by the full Commission. We have opened a docket (Docket No. 010102-TP) so these issues can be formally considered. Currently, staff is preparing interrogatories to obtain further clarification of the impact of the proposed database changes.

Verizon has indicated that recognition of its NXXs in the LERG/RDBS effective February 1, 2001, will have no impact on customer's billing, switching arrangements, or intercarrier compensation. Regardless of Verizon's assessment of the situation, in my November 17, 2000 letter, I requested that Verizon delay any further updates to the RDBS and BRIDS indefinitely to allow staff time to review the impact of such changes. Because Verizon did not inform me of its refusal to comply with my request, it was assumed that no changes would take place prior to a thorough review by staff.

In addition to Verizon's proposed RDBS/BRIDS updates, we are concerned with the impact of requiring all carriers to request new NXXs using the "proper" Tampa rate center designation, effective May 1, 2001, particularly as it relates to number utilization.

If we take no action and Verizon implements its proposed February 1, 2001, and May 1, 2001 updates, the RDBS and the BRIDS may need to be restructured should the Commission vote to resolve the rate center situation in a different manner.

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

(Count pg. 19)

Ms. Beverly Y. Menard, Assistant Vice President  
Page 2  
January 26, 2001

I request that no action be taken to update the RDBS or the BRIDS. Further, no action should be taken that would result in a requirement that ALECs designate a rate center for either their existing codes or future code requests, pending a Commission decision in this docket. In addition, I expect Verizon to submit in writing, no later than 5 p.m. February 12, 2001, the reason that it has continued to take actions to direct the updating of the data base systems subsequent to receipt of my November 17, 2001 letter requesting that further updates not be undertaken.

Should you have any questions regarding this case, please contact Bob Casey at (850) 413-6974.

Sincerely,



Walter D'Haeseleer  
Director, Division of Competitive Services

WD/cbb

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

STATE OF FLORIDA

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



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

**Public Service Commission**

January 26, 2001

Mr. Floyd R. Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32302-1876

VIA FACSIMILE

RE: Your January 24, 2001 letter regarding Verizon's proposed updates to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS)

Dear Mr. Self:

Please be informed that Docket No. 010102-TP has been opened to address the issue of Verizon's proposed updates to the RDBS and the BRIDS. I have sent a letter to Verizon, via facsimile, requesting that no further actions be taken to direct the update to the database systems. A copy of that letter has also been provided to you, via facsimile. If you have any questions, please call Bob Casey at (850) 413-6974.

Sincerely,

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

Walter D. Haeseleer  
Director, Division of Competitive Services

WD/cbb

cc: Division of Competitive Services (B. Salak, C. Bulecza-Banks, S. Simmons, D. Dowds, B. Casey, L. Ileri, L. Fulwood)  
Division of Legal Services (L. Fordham)  
Ms. Beverly Y. Menard, Verizon  
Karen M. Camechis, Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.  
Ms. Cheryl Dixon, NANPA  
Ms. Ann Walker, Telcordia

INTERCOMPANY CORRESPONDENCE



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	
			TEMPLETRRC	

FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET  
NO. 010102-TP EXHIBIT NO. 3  
COMPANY/  
WITNESS: Menard  
DATE: 3-27-01

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

Rate Center	Verizon Central Offices	CLLI	EAS	ECS
Tampa Central	Alafia	ALFAFLXA	Plant City	Clearwater
	Bayshore	BYSHFLXA		Dade City (Sprint)
	Beach Park	BHPKFLXA		Mulberry
	Carrollwood	CRWDFLXA		San Antonio (Sprint)
	East	TAMPFLXE		St. Petersburg
	Hyde Park	HYPKFLXA		Tarpon Springs
	Tampa Main	TAMPFLXX		Zephyrhills
	Seminole	SMNLFLXA		
	Sulphur Springs	SLSPFLXA		
	Sweetwater	SWTHFLXA		
	Temple Terrace	TMTRFLXA		
	University	UNVRFLXA		
	Wallcraft	WLCRFLXA		
	Westside	WSSDFLXA		
Ybor	YBCTFLXA			
Tampa East	Brandon	BRNDFLXA	Plant City	Clearwater
	Thonotosassa	THNTFLXA		Mulberry
				St. Petersburg
				Tarpon Springs Zephyrhills
Tampa North	Land O' Lakes	LNLKFLXA	Plant City Zephyrhills	Clearwater
	Lutz	LUTZFLXA		Dade City (Sprint)
	Wesley Chapel	WLCHFLXA		Mulberry
				New Port Richey
				San Antonio (Sprint) St. Petersburg Tarpon Springs
Tampa South	Ruskin	RSKNFLXA	Palmetto Plant City	Clearwater
	Wimauma	WIMMFLXA		Mulberry
				St. Petersburg
				Tarpon Springs
				Zephyrhills
Tampa West	Keystone	KYSTFLXA	Clearwater Plant City	Mulberry
	Oldsmar	OLDSFLXA		New Port Richey
				St. Petersburg
				Tarpon Springs
				Zephyrhills

**Note: All Tampa rate centers have local calling to all Tampa rate centers.**

Zip Codes in the Tampa Rate Center

<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33534	33527*	33543*	33503	33626
33602	33565*	33544*	33547	34677*
33603	33587*	34610*	33570	
33604	33594	34639*	33586	
33605		34669*	33598	
33606				
33607				
33608				
33609				
33610				
33611				
33612				
33613				
33614				
33616				
33617				
33618				
33620				
33621				
33624				
33629				
33634				
33637				

Shared Zip Codes in the Tampa Rate Center

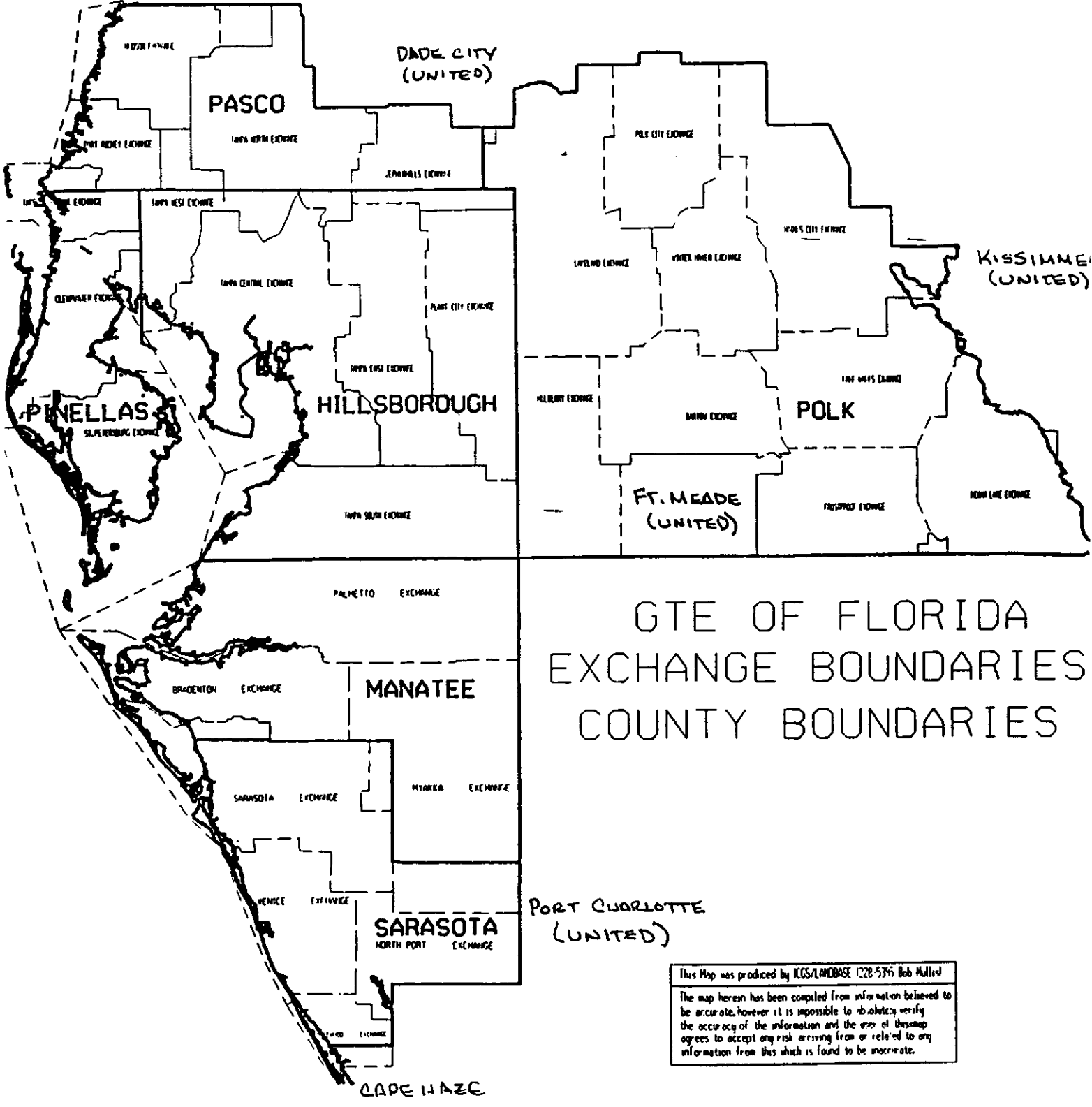
<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33510	33510 (mainly)			
33511	33511 (mainly)			
33547*	33547* (mainly)			
33549		33549 (mainly)		33549 (smidgen)
33556 (small)				33556 (mainly)
33569 (mainly)	33569		33569	
33572			33572 (mainly)	
33573 (smidgen)			33573 (mainly)	
33584	33584			
33592 (smidgen)	33592 (mainly)			
33615 (mainly)				33615
33619 (mainly)	33619 (smidgen)			
33625				33625
33635				33635 (mainly)
33647	33647	33647		

\* Zip code also includes exchanges outside the Tampa rate center



**ALEC Codes in 813 NPA Tampa Exchange**

	No. of Codes	Total	Central	East	North	South	West	Non-Tampa
<b>Designated Tampa Rate Centers</b>								
No Assignments	7							
Assignments	6							
Total	13	471	370	45	30	0	24	2
Percentage			78.56%	9.55%	6.37%	0.00%	5.10%	0.42%
Excl. Non-Tampa			78.89%	9.59%	6.40%	0.00%	5.12%	
<b>Non Designated Tampa Rate Centers</b>								
No Assignments	22							
Assignments	31							
Total	53	59385	58366	72	82	19	576	270
Percentage			98.29%	0.12%	0.14%	0.03%	0.97%	0.45%
Excl. Non-Tampa			98.73%	0.12%	0.14%	0.03%	0.98%	
<b>All Tampa Rate Centers</b>								
No Assignments	29							
Assignments	37							
Total	66	59856	58736	117	112	19	600	272
Percentage			98.13%	0.20%	0.19%	0.03%	1.00%	0.45%
Excl. Non-Tampa			98.57%	0.20%	0.19%	0.03%	1.01%	



# GTE OF FLORIDA EXCHANGE BOUNDARIES COUNTY BOUNDARIES

This Map was produced by ICGS/LANDBASE (328-5395) Bob Mullis

The map herein has been compiled from information believed to be accurate, however it is impossible to absolutely verify the accuracy of the information and the user of this map agrees to accept any risk arising from or related to any information from this which is found to be inaccurate.

Rate Center	Toll Routes Converts to EAS	Toll Routes Converts To ECS	ECS Routes Converts to EAS
Tampa Central	Palmetto	New Port Richey	Clearwater Zephyrhills
Tampa East	Palmetto	Dade City (Sprint) San Antonio (Sprint) New Port Richey	Clearwater Zephyrhills
Tampa North	Palmetto		Clearwater
Tampa South		Dade City (Sprint) San Antonio (Sprint) New Port Richey	Clearwater Zephyrhills
Tampa West	Palmetto	Dade City (Sprint) San Antonio (Sprint)	Zephyrhills

FLORIDA PUBLIC SERVICE COMMISSION  
 DOCKET  
 NO. 010102-TP EXHIBIT NO. 4  
 COMPANY/ Menard  
 DATE: 3-27-01

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET

NO. 010102-7P EXHIBIT NO. 5

COMPANY/

WITNESS: Menard

DATE: 3-27-01

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.7 AIRLINE MILEAGE BETWEEN RATE CENTERS (Continued)

A18.7.3 List of Rate Centers

Rate Center	LATA	V	H
Bartow	GTE Florida	8122	1036
Bradenton	GTE Florida	8270	1116
Clearwater	GTE Florida	8203	1206
Englewood	GTE Florida	8350	1023
Frostproof	GTE Florida	8120	0970
Haines City	GTE Florida	8059	1024
Hudson	GTE Florida	8117	1230
Indian Lake	GTE Florida	8087	0944
Lakeland	GTE Florida	8107	1071
Lake Wales	GTE Florida	8094	0996
Mulberry	GTE Florida	8133	1059
Myakka	GTE Florida	8256	1033
New Port Richey	GTE Florida	8142	1220
North Port	GTE Florida	8321	1013
Palmetto	GTE Florida	8266	1119
Plant City	GTE Florida	8127	1099
Polk City	GTE Florida	8067	1067
St. Petersburg	GTE Florida	8224	1159
Sarasota	GTE Florida	8295	1094
Tampa-Central Area <sup>1</sup>	GTE Florida	8173	1147
Tampa-East Area <sup>1</sup>	GTE Florida	8151	1117
Tampa-North Area <sup>1</sup>	GTE Florida	8108	1176
Tampa-South Area <sup>1</sup>	GTE Florida	8205	1101
Tampa-West Area <sup>1</sup>	GTE Florida	8156	1188
Tarpon Springs	GTE Florida	8165	1217
Venice	GTE Florida	8331	1053
Winter Haven	GTE Florida	8084	1034
Zephyrhills	GTE Florida	8092	1132

A18.8 DIRECTORY ASSISTANCE SERVICE

A18.8.1 General

- a. The Company furnishes directory assistance for the purpose of aiding subscribers in obtaining telephone numbers.
- b. When GTE customers in Florida request assistance in obtaining telephone numbers of subscribers who are located outside their local calling area but with the same Numbering Plan Area, the charges set forth following apply.
- c. Directory Connect Plus<sup>SM</sup>
  - (1) Directory Connect Plus<sup>SM</sup> provides an incoming Directory Assistance customer requesting an intraLATA number a mechanized announcement offering call completion to the listed number requested. The call is completed on a sent-paid basis (paid for by the calling customer).
  - (2) The mechanized announcement will instruct the caller that for an additional charge he may have his call automatically completed by depressing a specific digit on the touch-tone key pad. All completed calls will be charged the Directory Connect Plus<sup>SM</sup> surcharge, in addition to any other appropriate charges.
  - (3) Directory Connect Plus<sup>SM</sup> will only be furnished where facilities and operating conditions permit.
  - (4) Directory Connect Plus<sup>SM</sup> will not be provided to the following services:
    - 800/877/888 Service
    - 976 Service
    - 900 Service
    - Inmate Telephone Service (ITS)
    - Public Telephone Access Service (PATS) for Customer-Provided Equipment (CPE)
    - Public Telephone Service
    - Semipublic Telephone Service
  - (5) The Telephone Company assumes no responsibility or liability for any errors in the information furnished. The caller shall indemnify the Telephone Company and hold it free and harmless of and from any and all claims, demands or damages that shall arise from the use of the service.
    - (a) This service is furnished solely for the telephone calling purposes of the caller.
    - (b) Provisions concerning limitations of liability and allowance for interruption of service are as set forth in Section A2 of this Tariff.
  - (6) This offering provides call completion on a Local Access and Transport Area (LATA) basis.
  - (7) Charges for Directory Connect Plus<sup>SM</sup> are not applicable to subscribers who have been certified as unable to use a directory because of a visual or physical handicap.

NOTE 1: Rate centers to be used to determine mileage to non-Tampa rate centers within 40 miles of airline distance. Mileage measurement to rate centers that are 41 airline miles or more from a Tampa area will be computed using the Central Tampa V and H designation.

<sup>SM</sup> - Registered Servicemark of GTE

PETER A. DAKS, PRESIDENT  
TAMPA, FLORIDA

EFFECTIVE: June 23, 1998  
ISSUED: June 8, 1998

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.7 AIRLINE MILEAGE BETWEEN RATE CENTERS (Continued)

A18.7.3 List of Rate Centers

Rate Center	LATA	V	H
Bartow	GTE Florida	8122	1036
Bradenton	GTE Florida	8270	1116
Clearwater	GTE Florida	8203	1206
Englewood	GTE Florida	8350	1023
Frostproof	GTE Florida	8120	0970
Haines City	GTE Florida	8059	1024
Hudson	GTE Florida	8117	1230
Indian Lake	GTE Florida	8087	0944
Lakeland	GTE Florida	8107	1071
Lake Wales	GTE Florida	8094	0996
Mulberry	GTE Florida	8133	1059
Myakka	GTE Florida	8256	1033
New Port Richey	GTE Florida	8142	1220
North Port	GTE Florida	8321	1013
Palmetto	GTE Florida	8266	1119
Plant City	GTE Florida	8127	1099
Polk City	GTE Florida	8067	1067
St. Petersburg	GTE Florida	8224	1159
Sarasota	GTE Florida	8295	1094
Tampa-Central Area	GTE Florida	8173	1147
Tampa-East Area	GTE Florida	8151	1117
Tampa-North Area	GTE Florida	8108	1176
Tampa-South Area	GTE Florida	8205	1101
Tampa-West Area	GTE Florida	8156	1188
Tarpon Springs	GTE Florida	8165	1217
Venice	GTE Florida	8331	1053
Winter Haven	GTE Florida	8084	1034
Zephyrhills	GTE Florida	8092	1132

A18.8 DIRECTORY ASSISTANCE SERVICE

A18.8.1 General

- a. The Company furnishes directory assistance for the purpose of aiding subscribers in obtaining telephone numbers.
- b. When GTE customers in Florida request assistance in obtaining telephone numbers of subscribers who are located outside their local calling area but with the same Numbering Plan Area, the charges set forth following apply.
- c. Directory Connect Plus<sup>SM</sup>
  - (1) Directory Connect Plus<sup>SM</sup> provides an incoming Directory Assistance customer requesting an intraLATA number a mechanized announcement offering call completion to the listed number requested. The call is completed on a sent-paid basis (paid for by the calling customer).
  - (2) The mechanized announcement will instruct the caller that for an additional charge he may have his call automatically completed by depressing a specific digit on the touch-tone key pad. All completed calls will be charged the Directory Connect Plus<sup>SM</sup> surcharge, in addition to any other appropriate charges.
  - (3) Directory Connect Plus<sup>SM</sup> will only be furnished where facilities and operating conditions permit.
  - (4) Directory Connect Plus<sup>SM</sup> will not be provided to the following services: (C)
    - 800/888 Service
    - 976 Service
    - 900 Service
    - Inmate Telephone Service (ITS)
    - Public Telephone Access Service (PATS) for Customer-Provided Equipment (CPE)
    - Public Telephone Service
    - Semipublic Telephone Service
  - (5) The Telephone Company assumes no responsibility or liability for any errors in the information furnished. The caller shall indemnify the Telephone Company and hold it free and harmless of and from any and all claims, demands or damages that shall arise from the use of the service.
    - (a) This service is furnished solely for the telephone calling purposes of the caller.
    - (b) Provisions concerning limitations of liability and allowance for interruption of service are as set forth in Section A2 of this Tariff.
  - (6) This offering provides call completion on a Local Access and Transport Area (LATA) basis.
  - (7) Charges for Directory Connect Plus<sup>SM</sup> are not applicable to subscribers who have been certified as unable to use a directory because of a visual or physical handicap.

NOTE 1: Rate centers to be used to determine mileage to non-Tampa rate centers within 40 miles of airline distance. Mileage measurement to rate centers that are 41 airline miles or more from a Tampa area will be computed using the Central Tampa V and H designation.

<sup>SM</sup> - Registered Servicemark of GTE

PETER A. DAKS, PRESIDENT  
TAMPA, FLORIDA

EFFECTIVE: March 26, 1996  
ISSUED: March 11, 1996

*epk 5*

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.7 AIRLINE MILEAGE BETWEEN RATE CENTERS (Continued)

A18.7.3 List of Rate Centers

Rate Center	LATA	V	H
Bartow	GTE Florida	8122	1036
Bradenton	GTE Florida	8270	1116
Clearwater	GTE Florida	8203	1206
Englewood	GTE Florida	8350	1023
Frostproof	GTE Florida	8120	0970
Haines City	GTE Florida	8059	1024
Hudson	GTE Florida	8117	1230
Indian Lake	GTE Florida	8087	0944
Lakeland	GTE Florida	8107	1071
Lake Wales	GTE Florida	8094	0996
Mulberry	GTE Florida	8133	1059
Myakka	GTE Florida	8256	1033
New Port Richey	GTE Florida	8142	1220
North Port	GTE Florida	8321	1013
Palmetto	GTE Florida	8266	1119
Plant City	GTE Florida	8127	1099
Polk City	GTE Florida	8067	1067
St. Petersburg	GTE Florida	8224	1159
Sarasota	GTE Florida	8295	1094
Tampa-Central Area	GTE Florida	8173	1147
Tampa-East Area	GTE Florida	8151	1117
Tampa-North Area	GTE Florida	8108	1176
Tampa-South Area	GTE Florida	8205	1101
Tampa-West Area	GTE Florida	8156	1188
Tarpon Springs	GTE Florida	8165	1217
Venice	GTE Florida	8331	1053
Winter Haven	GTE Florida	8084	1034
Zephyrhills	GTE Florida	8092	1132

A18.8 DIRECTORY ASSISTANCE SERVICE

A18.8.1 General

- a. The Company furnishes directory assistance for the purpose of aiding subscribers in obtaining telephone numbers. (T)
- b. When GTE customers in Florida request assistance in obtaining telephone numbers of subscribers who are located outside their local calling area but with the same Numbering Plan Area, the charges set forth following apply. (T)
- c. Directory Connect Plus™
  - (1) Directory Connect Plus™ provides an incoming Directory Assistance customer requesting an intraLATA number a mechanized announcement offering call completion to the listed number requested. The call is completed on a sent-paid basis (paid for by the calling customer).
  - (2) The mechanized announcement will instruct the caller that for an additional charge he may have his call automatically completed by depressing a specific digit on the touch-tone key pad. All completed calls will be charged the Directory Connect Plus™ surcharge, in addition to any other appropriate charges.
  - (3) Directory Connect Plus™ will only be furnished where facilities and operating conditions permit.
  - (4) Directory Connect Plus™ will not be provided to the following services:
    - 800 Service
    - 976 Service
    - 900 Service
    - Inmate Telephone Service (ITS)
    - Public Telephone Access Service (PATS) for Customer-Provided Equipment (CPE)
  - (5) The Telephone Company assumes no responsibility or liability for any errors in the information furnished. The caller shall indemnify the Telephone Company and hold it free and harmless of and from any and all claims, demands or damages that shall arise from the use of the service.
    - (a) This service is furnished solely for the telephone calling purposes of the caller.
    - (b) Provisions concerning limitations of liability and allowance for interruption of service are as set forth in Section A2 of this Tariff.
  - (6) This offering provides call completion on a Local Access and Transport Area (LATA) basis. (N)

NOTE 1: Rate centers to be used to determine mileage to non-Tampa rate centers within 40 miles of airline distance. Mileage measurement to rate centers that are 41 airline miles or more from a Tampa area will be computed using the Central Tampa V and H designation.

™ - Registered Servicemark of GTE

GERALD K. DINSHORE, PRESIDENT  
TAMPA, FLORIDA

EFFECTIVE: June 9, 1993  
ISSUED: June 9, 1993

## A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

(N)

## A18.7 AIRLINE MILEAGE BETWEEN RATE CENTERS (Continued)

## A18.7.3 List of Rate Centers

<u>Rate Center</u>	<u>LATA</u>	<u>V</u>	<u>H</u>	
Bartow	GTE Florida	8122	1036	(T)
Bradenton	GTE Florida	8270	1116	(T)
Clearwater	GTE Florida	8203	1206	(T)
Englewood	GTE Florida	8350	1023	(T)
Frostproof	GTE Florida	8120	0970	(T)
Haines City	GTE Florida	8059	1024	(T)
Hudson	GTE Florida	8117	1230	(T)
Indian Lake	GTE Florida	8087	0944	(T)
Lakeland	GTE Florida	8107	1071	(T)
Lake Wales	GTE Florida	8094	0996	(T)
Mulberry	GTE Florida	8133	1059	(T)
Myakka	GTE Florida	8256	1033	(T)
New Port Richey	GTE Florida	8142	1220	(T)
North Port	GTE Florida	8321	1013	(T)
Palmetto	GTE Florida	8266	1119	(T)
Plant City	GTE Florida	8127	1099	(T)
Polk City	GTE Florida	8067	1067	(T)
St. Petersburg	GTE Florida	8224	1159	(T)
Sarasota	GTE Florida	8295	1094	(T)
Tampa-Central Area <sup>1</sup>	GTE Florida	8173	1147	(T)
Tampa-East Area <sup>1</sup>	GTE Florida	8151	1117	(T)
Tampa-North Area <sup>1</sup>	GTE Florida	8108	1176	(T)
Tampa-South Area <sup>1</sup>	GTE Florida	8205	1101	(T)
Tampa-West Area <sup>1</sup>	GTE Florida	8156	1188	(T)
Tarpon Springs	GTE Florida	8165	1217	(T)
Venice	GTE Florida	8331	1053	(T)
Winter Haven	GTE Florida	8084	1034	(T)
Zephyrhills	GTE Florida	8092	1132	(T)

## A18.8 DIRECTORY ASSISTANCE SERVICE

## A18.8.1 General

The Company furnishes directory assistance for the purpose of aiding subscribers in obtaining telephone numbers.

When GTE customers in Florida request assistance in obtaining telephone numbers of subscribers who are located outside their local calling area but with the same Numbering Plan Area, the charges set forth following apply. (N)

NOTE 1: Rate centers to be used to determine mileage to non-Tampa rate centers within 40 miles of airline distance. Mileage measurement to rate centers that are 41 airline miles or more from a Tampa area will be computed using the Central Tampa V and H designation. (N)



**ORIGINAL**

Docket No. 010102-TP  
Late Filed Exhibit No. 6  
Beverly Y. Menard  
Page 1 of 3

**VERIZON TOLL RATES**

**FLORIDA PUBLIC SERVICE COMMISSION**  
DOCKET  
NO. 010102-TP EXHIBIT NO. 6  
COMPANY/  
WITNESS: Menard  
DATE: 3-29-01

DOCUMENT NUMBER-DATE

04206 APR-5

FPSC-RECORDS/REPORTING

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.5 TWO-POINT SERVICE (Continued)

A18.5.1 Service Between Land Wire Telephones (Continued)

.8 Rate Tables

(a.) Station-to-Station Customer Dialed

RATE AIRLINE MILES		RATES			
		CUSTOMER DIALED DIRECT			
		STATION-TO-STATION			
		PEAK		OFF-PEAK	
Over	Up to and Including	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)
0 - 10		\$ .19 (R)	\$ .19 (R)	\$ .11 (C)	\$ .11 (C)
11 - 22		.19 (R)	.19 (R)	.11 (C)	.11 (C)
23 - 55		.19 (R)	.19 (R)	.11 (C)	.11 (C)
56 - 124		.19 (R)	.19 (R)	.11 (C)	.11 (C)

(b.) Station-to-Station Customer Dialed Calling Card

RATE AIRLINE MILES		RATES			
		CUSTOMER DIALED CALLING CARD			
		STATION-TO-STATION			
		PEAK		OFF-PEAK	
Over	Up to and Including	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)
0 - 10		\$ .19 (R)	\$ .19 (R)	\$ .11 (C)	\$ .11 (C)
11 - 22		.19 (R)	.19 (R)	.11 (C)	.11 (C)
23 - 55		.19 (R)	.19 (R)	.11 (C)	.11 (C)
56 - 124		.19 (R)	.19 (R)	.11 (C)	.11 (C)

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.5 TWO-POINT SERVICE (Continued)

A18.5.1 Service Between Land Wire Telephones (Continued)

.8 Rate Tables (Continued)

(c.) Station-to-Station and/or Person-to-Person Operator Assisted Dialed Call

RATE		RATES			
AIRLINE		OPERATOR ASSISTED DIALED			
MILES		STATION-TO-STATION			
		PEAK		OFF-PEAK	
Over	Up to and Including	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)
0 - 10		\$ .19	\$ .19	\$ .11	\$ .11
11 - 22		.19	.19	.11	.11
23 - 55		.19	.19	.11	.11
56 - 124		.19	.19	.11	.11

(d.) Station-to-Station Coin Telephones

(1)

RATE		RATES			
AIRLINE		COIN TELEPHONES			
MILES		STATION-TO-STATION (SENT PAID)			
		PEAK		OFF-PEAK	
Over	Up to and Including	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)
0 - 10		\$ .19	\$ .19	\$ .11	\$ .11
11 - 22		.19	.19	.11	.11
23 - 55		.19	.19	.11	.11
56 - 124		.19	.19	.11	.11

(2)

RATE		RATES			
AIRLINE		COIN TELEPHONES			
MILES		STATION-TO-STATION (NON-SENT PAID)			
		PEAK		OFF-PEAK	
Over	Up to and Including	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)	1st Minute (or any fraction thereof)	Each Additional Minute (or any fraction thereof)
0 - 10		\$ .25	\$ .25	\$ .25	\$ .25
11 - 22		.25	.25	.25	.25
23 - 55		.25	.25	.25	.25
56 - 124		.25	.25	.25	.25

(M) Material has been moved to Page 8.2.

(T)

(C)

(N)

(N)

(M)

(N)

Post-It™ brand fax transmittal memo 7871		# of pages >
To	BOB VANDUKE	From
Co.		SKIP GANCAZ
Dept.		Co.
Fax #	744-2469	Phone #
		224-4663
		Fax #

NXX's  
TAMPA

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET

NO. 010102-P EXHIBIT NO. 7

COMPANY/

WITNESS: Menard

DATE: 3-27-01

**Central Office Code (NNX/NXX) Assignment Request - Part 3**

Date of Application: Oct 12, 1995  
Date of Response: Oct 12, 1995

Date of Receipt: Oct 12, 1995  
Effective Date: May 04, 1996

**Code Administrator Contact Information:**

*S. J. Ganzarz*  
Signature of Code Administrator  
S. J. Ganzarz  
Name (Print)

Phone: 813 224-4663  
FAX: 813 228-8733

XX Code Assigned: 813 - 829 Date of NXX Code Assignment: 10/12/95

Routing and rating information complete: Yes \_\_\_\_\_ No \_\_\_\_\_  
Additional RDBS and BRADS information necessary as follows:  
\_\_\_\_\_  
\_\_\_\_\_

To be published in the LERG and TPM by \_\_\_\_\_ additional RDBS and BRADS information needs to be received by the code Administrator no later than \_\_\_\_\_

Code Reserved: \_\_\_\_\_ Date of Reservation: \_\_\_\_\_

Your code reservation will be honored until \_\_\_\_\_

Form Incomplete  
Additional information required in the following section(s):  
\_\_\_\_\_  
\_\_\_\_\_

Form complete, code request denied.  
Explanation: \_\_\_\_\_  
\_\_\_\_\_

Assignment activity suspended by the administrator.  
Explanation: \_\_\_\_\_  
\_\_\_\_\_

Further Action: \_\_\_\_\_

NPA in jeopardy: Yes XX No

If yes, refer to Section 7 of the assignment guidelines.

Remarks:

NXX CODE FOR TAMPA ALEC ICI - TAMPFLUTDS0 - POTS/DID

IN SERVICE 05/04/96

**Central Office Code (NNX/NXX) Assignment Request - Part 4**

**Confirmation of Code Activation (Required)**

By signing below, I certify that the CO code (NNX/NXX) specified in Section 1 below is in service and that the CO code (NNX/NXX) is being used for the purpose specified in the original application (See Section 6.3.3)

Authorized Representative of Code Applicant (Print)

Signature

Title

Date

- 1. NNX/NXX code: 813 - 829
- 2. Dates:
  - Date of Application: 10/12/95
  - In-Service Date: \_\_\_\_\_

**NNX CODE FOR TAMPA ALEC ICI - TAMPFLUTDS0 - POTS/DID  
IN-SERVICE DATE 05/04/96**

**Central Office Code (NNX/NXX) Assignment Request - Part 3**

Date of Application: Oct 12, 1995  
Date of Response: Oct 12, 1995

Date of Receipt: Oct 12, 1995  
Effective Date: May 04, 1996

**Code Administrator Contact Information:**

*S. J. Ganpatz*  
Signature of Code Administrator  
S. J. Ganpatz  
Name (Print)

Phone: 813 224-4663

FAX: 813 228-8733

XX Code Assigned: 813 - 812 Date of NXX Code Assignment: 10/12/95

Routing and rating information complete: Yes \_\_\_\_\_ No \_\_\_\_\_  
Additional RDBS and BRADS information necessary as follows:  
\_\_\_\_\_  
\_\_\_\_\_

To be published in the LERG and TPM by \_\_\_\_\_ additional RDBS and BRADS information needs to be received by the code Administrator no later than \_\_\_\_\_

Code Reserved: \_\_\_\_\_ Date of Reservation: \_\_\_\_\_

Your code reservation will be honored until \_\_\_\_\_

Form Incomplete  
Additional information required in the following section(s):  
\_\_\_\_\_  
\_\_\_\_\_

Form complete, code request denied.  
Explanation: \_\_\_\_\_  
\_\_\_\_\_

Assignment activity suspended by the administrator.  
Explanation: \_\_\_\_\_  
\_\_\_\_\_

Further Action: \_\_\_\_\_  
\_\_\_\_\_

NPA in Jeopardy: Yes XX No

If yes, refer to Section 7 of the assignment guidelines.

Remarks:

**NXX CODE FOR TAMPA ALEC ICI - SPBGFLHURS0 - POTS/DID**

**IN SERVICE 05/04/96**

**Central Office Code (NNX/NXX) Assignment Request - Part 4**

**Confirmation of Code Activation (Required)**

By signing below, I certify that the CO code (NNX/NXX) specified in Section 1 below is in service and that the CO code (NNX/NXX) is being used for the purpose specified in the original application (See Section 6.3.3)

**Authorized Representative of Code Applicant (Print)**

**Signature**

**Title**

**Date**

- 1. **NNX/NXX code:**      813 - 812
- 2. **Dates:**
  - Date of Application:**    10/12/95
  - In-Service Date:**        \_\_\_\_\_

**NNX CODE FOR TAMPA ALEC ICI - SPBGFLHURSO - POTS/DID  
IN-SERVICE DATE 05/04/96**



FLORIDA PUBLIC SERVICE COMMISSION

DOCKET  
NO. 010102-P EXHIBIT NO. 8

COMPANY/  
WITNESS: Menard

DATE 3-27-01

Administrator's Response/Confirmation

Date of Application: November 05, 1997 Date of Receipt: November 05, 1997  
Date of Response: November 05, 1997 Effective Date: January 10, 1998

Code Administrator Contact Information:

S. J. GANCARZ

Signature of Code Administrator

Phone: 813 483-2033

S. J. GANCARZ

Fax: 813 228-8733

Name (Print)

Code Assigned: 472 NPA: 813 Date of Assignment: November 05, 1997

- a. Switch identification (Switching Entity/POD) : TAMPELITDS0
- b. Routing and Rating information complete: Yes  No  Additional RDBS and BRIDS information necessary as follows:

- c. The Code Administrator is , is not  responsible for inputting Part2 information into RDBS and BRIDS.
- d. To be published in the LERG and TPM by  Additional RDBS and BRIDS information needs to be received by the Code Administrator no later than \_\_\_\_\_

Code Reserved: \_\_\_\_\_ Date of Reservation: \_\_\_\_\_

Your code reservation will be honored until \_\_\_\_\_

Switch identification (Switching Entity/POI) : \_\_\_\_\_

Form Incomplete

Additional information required in the following section(s):

Form Complete, code request denied:

Explanation: Months to exhaust exceeds 6 months See attached letter

Assignment activity suspended by the administrator.

Explanation: \_\_\_\_\_

Further Action: \_\_\_\_\_

NPA in jeopardy: Yes  No

If yes, refer to Section 7 of the assignment guidelines.

Remarks:

TAMPA RATE CENTER

NXX 813 - 472 - INTERMEDIA - TAMPELITDS0 - POTS 1/10/98

15. This is an eleven character descriptor of the switch provided by the owning entity for the purpose of routing calls. This

Is the 11 character COMMON LANGUAGE Location Identification (CLLI) of the switch or POI shown on Part 1 of this form.

16. WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into RDBS and BRIDS. The 45 calendar day nation-wide minimum interval cut-over for RDBS and BRIDS will not begin until input into RDBS and BRIDS has been completed.

**Confirmation of Code Activation (Required)**

By signing below, I certify that the CO code (NXX) specified in Section 1 below is in service and that the CO code (NXX) is being used for the purpose specified in the original application. (See Section 6.3.3)

\_\_\_\_\_  
Authorized Representative of Code Applicant (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

1. NPA-NXX code: 813 - 472

2. Switch Identification (Switching Entity/POI) : TAMPELUTDS0

3. Dates:

Date of Application: NOVEMBER 05, 1997

In-Service Date: JANUARY 10, 1998

**TAMPA RATE CENTER**

17. This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character COMMON LANGUAGE Location identification (CLLI) of the switch or POL



**ORIGINAL**

Docket No. 010102-TP  
Late Filed Exhibit No. 9  
Beverly Y. Menard  
Page 1 of 14

**CIGRR NOTIFICATIONS**

The CIGRR forum is open to all AOCN's (Operating Company Name/Number) in the industry (any one who has been assigned an NXX). It is their option whether they attend any given meeting. There is a listing of Company's who have attended CIGRR along with their contact name, number and e-mail address. Attached is the CIGRR listing which was used for the Tampa Rate Center project.

Network Routing Resources Information Committee (NRRIC) is a sister type forum which is open to anyone. NRRIC has a larger distribution list than CIGRR. Future CIGRR meeting dates are provided to all NRRIC forum participants.

**FLORIDA PUBLIC SERVICE COMMISSION**  
DOCKET  
NO. 010102-TP EXHIBIT NO. 9  
COMPANY/  
WITNESS. Menard  
DATE: 3-27-01

DOCUMENT NUMBER-DATE

04207 APR-50

FPSC-RECORDS/REPORTING

Bev

813-273-0659

COMPANY	CIGRR CONTACT	TELEPHONE/FAX EMAIL
ADELPHI BUSINESS SOLUTIONS.  <i>AOCN 7129</i>	Kimberly Milchuck 712 N. Main Street Coudersport, PA 16915	(814) 274-6901 (814) 274-6867 <a href="mailto:kmill@hyperion.net">kmill@hyperion.net</a>
AIRTOUCH (VODAFONE AIRTOUCH PLC)  <i>AOCN G056</i>	Joanne Edelman Technical Support Manager 2785 Mitchell Drive., MS 7-1 Walnut Creek, CA 94598	(925) 279-6159 (925) 279-6621 <a href="mailto:Joanne.Edelman@airtouch.com">Joanne.Edelman@airtouch.com</a>
ALASKA COMMUNICATIONS SYSTEMS HOLDING, INC.  <i>AOCN 3000</i>	Dorian Wallender 600 Telephone Avenue Anchorage, AK 99503	(907) 564-1582 (907) 564-8590 <a href="mailto:Dwallend@atu.com">Dwallend@atu.com</a>
ALIAN COMM. CO.  <i>AOCN 1568</i>	William Klabenes 1440 M Street, 7th Fl. Lincoln, NE 68501	(402) 436-4347 (402) 436-5527 <a href="mailto:Bill.Klabenes@alltel.com">Bill.Klabenes@alltel.com</a>
ALLTEL  <i>AOCN 0476</i>	Elaine Deese 6920 E. Marshville Rd. P.O. Box 520 Marshville, NC 28103	(704) 845-7290 (704) 845-7229 <a href="mailto:elaine.deese@alltel.com">elaine.deese@alltel.com</a>
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AMERICAN METRO COM  <i>AOCN 7841</i>	Chris Reabard 1615 Poidras Street, Rm. 1050 New Orleans, LA 70112	(504) 200-2166 (504) 200-2020
AMERITECH  <i>AOCN 9300</i>	Trish Phelps 1365 Cass Ave., Rm. 930 Detroit, MI 48226	(313) 983-8591 (313) 983-8723 <a href="mailto:patricia.phelps@ameritech.com">patricia.phelps@ameritech.com</a>

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AT&T LOCAL/TCG <i>AOCN 7421 and 7125</i>	Tim Barry 900 Rte. 202/206N, Rm. 4B120D Bedminster, NJ 07921	(908) 234-4589 (908) 719-7337 <a href="mailto:timothyb@att.com">timothyb@att.com</a>
AT&T WIRELESS/L.A. <i>AOCN 6228</i>	Samuel Raymundo 12900 Park Plaza Dr. Cerritos, CA 90703-8573	(562) 468-6745 (562) 468-6791 <a href="mailto:samuel.raymundo@attws.com">samuel.raymundo@attws.com</a>
BARTELCO <i>AOCN 8904</i>	Ed Layne P.O. Box 32 Bridgetown, Barbados	(246) 429-5050 (246) 436-5036
BELL ATLANTIC <i>AOCN 91XX, 92XX (not 9147)</i>	Myra Walls 1 E. Pratt Street, 3E11 Baltimore, MD 21202	(410) 736-6035 (410) 736-6647 <a href="mailto:MYRA.L.WALLS@BELLATLANTIC.com">MYRA.L.WALLS@BELLATLANTIC.com</a>
BELL CANADA <i>AOCN 8050, 8051</i>	Jackie Bahan 2121 Saskatchewan Dr., 12th Fl. Regina, SK S4P 3Y2	(306) 777-8767 (306) 352-4142 <a href="mailto:jackie.bahan@sasktel.sk.ca">jackie.bahan@sasktel.sk.ca</a>
BELLSOUTH <i>AOCNs 9417, 9419</i>	Mary Ann Palmisano 675 W. Peachtree St., Rm. 22P69 Atlanta, GA 30375	(404) 927-8655 (404) 524-2918 <a href="mailto:marvann.palmisano@bridge.bellsouth.com">marvann.palmisano@bridge.bellsouth.com</a>
BELLSOUTH CELLUAR CORP. <i>AOCN G045</i>	Charolotte Piper 5600 Glenridge Drive, Ste. G107 Atlanta, GA 30342	(404) 713-5119 (404) 847-3351 <a href="mailto:charlotte_piper@bscc.bls.com">charlotte_piper@bscc.bls.com</a>

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<b>CABLE &amp; WIRELESS</b> Antigua and Monserrat <i>AOCN 8902</i>	Dean Jonas P.O. Box 65 St. Johns, Antigua	(268) 480-4413 (268) 480-4400 <a href="mailto:jonasd@candw.ag">jonasd@candw.ag</a>
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<b>CINCINNATI BELL</b> <i>AOCN 9348</i>	Vicky Gentry 229 West 7th Street, Rm. 121-1075 Cincinnati, OH 45202	(513) 566-3174 (513) 651-9089 <a href="mailto:vgentry@cinbell.com">vgentry@cinbell.com</a>
<b>CITIZENS TELECOM</b> <i>AOCN 3400</i>	Kathy Ross 5600 Headquarters Drive P.O. Box 251209 Plano, TX 75025-1209	(469) 365-3340 (469) 364-4059 <a href="mailto:Kross@czn.com">Kross@czn.com</a>
<b>COMPETTIVE COMMUNICATION GROUP</b> <i>AOCN G029</i>	Terri Firestein 10806 Garrison Hollow Road Clear Spring, MD 21722	(301) 842-1437 (301) 842-1439 <a href="mailto:tfireceg@aol.com">tfireceg@aol.com</a>
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ESPIRE COMMUNICATIONS  <i>AOCN G024</i>	Barbara Jordan 8201 Greensboro Drive, Ste. 1100 McLean, VA 22102	(703) 386-2222 (703) 386-2035 <a href="mailto:Barbara.Jordan@espire.net">Barbara.Jordan@espire.net</a>
FIRSTWORLD COMM.  <i>AOCN 7746, 7839</i>	Vicki Healy 1520 S. Lewis Street Anaheim, CA 92805  Kim Allen 300 S. Harbor Blvd., Ste. 814 Anaheim, CA 92805	(714) 776-2428 (714) 769-2402 <a href="mailto:vicki.healy@firstworld.com">vicki.healy@firstworld.com</a>  <a href="mailto:kim.allen@firstworld.com">kim.allen@firstworld.com</a>
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FRONTIER COMM. OF NY, INC.  <i>AOCN 0100</i>	Jennifer White (lower State of NY) 145 N. Main Monroe, NY 10950 or  Sue Cicotta (upper State of NY) 180 S. Clinton Avenue, 6 <sup>th</sup> Fl. Rochester, NY 14656	(914) 782-1066 (914) 782-9994  (716) 777-1692 (716) 325-4481 <a href="mailto:susan_cicotta@frontiercorp.com">susan_cicotta@frontiercorp.com</a>
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GST Telecom  <i>AOCN 7456</i>	Neil Wagoner 4001 Main Street Vancouver, WA 98663	(360) 356-2867 (360) 356-4600 <a href="mailto:Neil.Wagoner@gstworld.net">Neil.Wagoner@gstworld.net</a>
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GTE  <i>AOCN 0772</i>	Sheri Pressler 8001 W. Jefferson Blvd. Fort Wayne, IN 46804  Joel A. Lamb 8001 W. Jefferson Blvd. Fort Wayne, IN 46804	(219) 461-3475 (219) 461-3472 <a href="mailto:sheri.pressler@gte.com">sheri.pressler@gte.com</a>  (219) 461-2168 (219) 461-3472 <a href="mailto:joel.lamb@gte.com">joel.lamb@gte.com</a>
GUAM TELEPHONE AUTHORITY  <i>AOCN 3800</i>	Carl P. Leon Guerrero 344A North Marine Drive Dededo, GU 96912 or  Nelson Yap 344A North Marine Drive P.O. Box 9008 Tamuning, GU 95931	(671) 632-3116 (671) 632-3337  (671) 632-3199 <a href="mailto:nyap@ns.gu">nyap@ns.gu</a>
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<b>ICORE</b>  <i>AOCN G043</i>	Don Snyder 326 S. Second Street Emmaus, PA 18049	(610) 967-3944 (610) 967-5036 <a href="mailto:donsnydr@ptd.net">donsnydr@ptd.net</a>
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MCI WORLDCOM  <b>AOCN 7228</b>	Dawn Lawrence 2855 Oak Industrial Dr., NE Grand Rapids, MI 49505	(972) 656-1012 (972) 656-5022 <a href="mailto:dawn.lawrence@mci.com">dawn.lawrence@mci.com</a>
MCI WORLDCOM  <b>AOCN 7228</b>	Cheryl Kizzee 2250 Lakeside Blvd. Richardson, TX 75080	(972) 656-1613 (972) 656-5022 <a href="mailto:Cheryl.Kizzee@wcom.com">Cheryl.Kizzee@wcom.com</a>
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MCLEOD USA/ILLINOIS CONSOLIDATED  <b>AOCN 1037</b>	Kaye Sims 121 South 17th Street, Bldg. 6-1 Mattoon, IL 61938	(217) 258-9562 (217) 234-3014 <a href="mailto:kaye_sims@consolidated.com">kaye_sims@consolidated.com</a>
MEDIAONE  <b>AOCN G040</b>	Dena M. Hunter 9000 E. Nichols, Ste 100 Englewood, CO 80112	(303) 705-5145 (303) 790-1094 <a href="mailto:denahunter@mediaone.com">denahunter@mediaone.com</a>
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<b>NATIONPAGE, INC.</b>  <b>AOCN G049</b>	James Flamisch 4350 Commerce Drive Whitehall, PA 18052	(610) 703-6262 (610) 703-6289 <a href="mailto:flamisch@vcela.com">flamisch@vcela.com</a>
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<b>NEXTEL</b>  <b>AOCN 6232</b>	Kathryn Barrett 2003 Edmund Halley Drive Reston, VA 20191	(703) 433-8170 (703) 433-8102 <a href="mailto:Kathryn.Barrett@Nextel.com">Kathryn.Barrett@Nextel.com</a>
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OLSEN THIELEN & COMPANY, LTD.  <i>AOCN G039</i>	Barbara Panek 223 Little Canada Road, East St. Paul, MN 55117	(651) 483-4571 (651) 483-2467
ONE POINT COMMUNICATIONS  <i>AOCN G055</i>	Gary Moulton 12901 Worldgate Drive, 6 <sup>th</sup> Floor Herndon, VA 20170-5808	(703) 375-4608 (703) 4679019 <a href="mailto:Gary.moulton@onepointcom.com">Gary.moulton@onepointcom.com</a>
OPTION ONE COMMUNICATION  <i>AOCN 4129</i>	Erik Sagerdahl 770 L Street, Ste. 960 Sacramento, CA 95814	(916) 810-8910 (916) 441-1805 <a href="mailto:eriks@jps.net">eriks@jps.net</a>
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PUERTO RICO TELEPHONE CO.  <i>AOCN 3201</i>	Angeles Perez P.O. Box 360998 San Juan, PR 00936-0998	(787) 749-3500 (787) 782-2570

<b>COMPANY</b>	<b>CIGRR CONTACT</b>	<b>TELEPHONE/FAX EMAIL</b>
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ROCK HILL TELEPHONE CO.  <i>AOCN 0542</i>	Miles (Buck) Wallace 330 East Black Street P.O. Box 470 Rock Hill, SC 29731	(803) 324-6100 (803) 324-6134
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SAIC CANADA  <i>AOCN G-054</i>	Fiona Clegg 60 Quenn Street, Ste. 702 Ottawa, Ontario, Canada K1P 5Y7	(613) 563-7242 (613) 563-9293 <a href="mailto:fiona.clegg@cnac.ca">fiona.clegg@cnac.ca</a>
SHELL OFFSHORE SERVICES COMPANY  <i>AOCN 7023</i>	Emanda Craig One Shell Square 701 Poydras, Rm. 1532 P.O. Box 61933 New Orleans, LA 70161	(504) 728-4949 (504) 728-0368
SMITHVILLE TELEPHONE CO.  <i>AOCN 0818</i>	Darryl Smith 1600 W. Temperance St. Ellettsville, IN 47429	(812) 876-2211 (812) 876-9267
SOUTH CAROLINA PHONE. LLC  <i>AOCN G061</i>	David Plott 25 Garlington Road Greenville, SC 29615	(864) 272-6261 (864) 272-6350
SBC  <i>AOCN 9740, 9742, 9533 and 9147</i>	Mario Espitia 2600 Camino Ramon, Rm. 1S900X San Ramon, CA 94583	(925) 823-2710 (925) 355-9268 <a href="mailto:mxespiit@msg.pachell.com">mxespiit@msg.pachell.com</a>

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<b>SOUTHWESTERN BELL MOBILE</b>  <b>AOCN 6534</b>	Tammy Marker 840 E. State Pkwy. Schaumburg, IL 60173	(847) 303-3864 (847) 882-6543
<b>SOUTHWESTERN BELL WIRELESS</b>  <b>AOCN 6671</b>	Stephen Weber 310 Himes Eules, TX 76039	(817) 355-4294 (817) 540-1693
<b>SPRINT</b>  <b>AOCN 0138, 0209, 0661,0985, 1842, 2400</b>	Barbara Green P.O. Box 165000, MS FLAPKA0242 Altamonte Springs, FL 327165000	(407) 889-1330 (407) 884-1978 <a href="mailto:barbara.green@mail.sprint.com">barbara.green@mail.sprint.com</a>
<b>SPRINT</b>  <b>AOCN 0470</b>	Sarah Harrell 720 Western Blvd., Rm. MS NCTRBB0211 Tarboro, NC 27886	(252) 641-3353 (252) 823-9380 <a href="mailto:sarah.harrell@mail.sprint.com">sarah.harrell@mail.sprint.com</a>
<b>SPRINT PCS</b>  <b>AOCN 6664</b>	Sandra Gevers 11880 College Blvd. Overland Park, KS 66210	(913) 315-2614 (913) 315-2448 <a href="mailto:sgevcr01@sprintspectrum.com">sgevcr01@sprintspectrum.com</a>
<b>TCA, Inc.</b>  <b>AOCN G031</b>	Ronna Hladek 1465 Kelly Johnson Blvd., Ste. 200 Colorado Springs, CO 80920	(719) 266-4334 (719) 266-4335 <a href="mailto:Ronna@jcatel.com">Ronna@jcatel.com</a>
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<b>TELECOM CONSULTING</b>  <b>AOCN G041</b>	Julie Marotta 4 Coolidge Road Milton, MA 02186	(617) 696-6841 (617) 696-6478

<b>COMPANY</b>	<b>CIGRR CONTACT</b>	<b>TELEPHONE/FAX EMAIL</b>
TELEINFO SYSTEMS, INC.  <i>AOCN G046</i>	William Warinner 10901 West 84 <sup>th</sup> Terrace, Ste. 101 Lenexa, KS 66214-1631  Phyllis Callahan (same as above)	(913) 599-3236 (913) 599-3737  (913) 599-3236 (913) 599-3737
TELIGENT, INC.  <i>AOCN 8387</i>	Karen Harvey 8065 Leesburg Pike Vienna, VA 22182	(703) 762-5428 (703) 288-5643 <a href="mailto:karen.harvey@teligent.com">karen.harvey@teligent.com</a>
TIME WARNER TELECOM  <i>AOCN 7178</i>	Teresa Newkirk 5700 S. Quebec St. Greenwood Village, CO 80111	(303) 566-5954 (888) 329-0668 <a href="mailto:teresa.newkirk@twtelecom.com">teresa.newkirk@twtelecom.com</a>
TRICETEL OF PENNSYLVANIA  <i>AOCN G060</i>	Nathan Stratton 10002 Maple Ave., Suite 101 Columbia, MD 21046	(410) 772-8148 (410) 772-8147 <a href="mailto:Nathan@tricetel.net">Nathan@tricetel.net</a>
UPSTATE CELLULAR NETWORK  <i>AOCN 6959</i>	Diane Peters 133 Calkins Road Rochester, NY 14623	(716) 321-7093 (716) 321-7060 <a href="mailto:dpeters@frontiercellular.com">dpeters@frontiercellular.com</a>
US WEST  <i>AOCN 9636</i>	Joan Ross 700 W. Mineral, MTE28.10 Littleton, CO 80120	(303) 707-7019 (303) 707-9578 <a href="mailto:jmross@uswest.com">jmross@uswest.com</a>
U.S. VIRGIN ISLAND TELEPHONE CO.  <i>AOCN 3300</i>	Lena Steele-Williams P.O. Box 6100 St. Thomas, USVI 00801	(340) 775-7160 (340) 775-1649
USTA	Anthony Pupek 1401 H St., NW, Suite 600 Washington, DC 20005-21264	(202) 326-7296 (202) 326-7333



COMPANY	CIGRR CONTACT	TELEPHONE/FAX EMAIL
TRA	Tom W. Mazzone 8 Corporate Place, Rm. 3M104 Piscataway, NJ 08854-4156	(732) 699-5507 <i>LGCC</i> (732) 336-6999 <a href="mailto:tmazzone@telcordia.com">tmazzone@telcordia.com</a>
TRA	Barbara Reed 8 Corporate Place, Rm. 3E133 Piscataway, NJ 08854-4156	(732) 699-6650 (732) 336-6999 <a href="mailto:breed@telcordia.com">breed@telcordia.com</a>
TRA	Ed Rodriguez 8 Corporate Place, Rm. 3E125 Piscataway, NJ 08854-4156	(732) 699-6640 (732) 336-6999 <a href="mailto:erodrigu@telcordia.com">erodrigu@telcordia.com</a>
TRA	Mary Ann Southard 8 Corporate Place, Rm. 3E133 Piscataway, NJ 08854-4156	(732) 699-6633 (732) 336-6999 <a href="mailto:msouthar@telcordia.com">msouthar@telcordia.com</a>
Telcordia (RAOs) (CMDS)	Vic Basinski 8 Corporate Place, Rm. 3C218 Piscataway, NJ 08855-4156	(732) 699-5243 (732) 336-6585 <a href="mailto:vbasinsk@telcordia.com">vbasinsk@telcordia.com</a>
Telcordia COMMON LANGUAGE®	Charles Sacco 444 Hoes Lane, Rm. 4D820 Piscataway, NJ 08855-1324	(732) 699-4382 (732) 699-2980 <a href="mailto:csacco@telcordia.com">csacco@telcordia.com</a>

**ORIGINAL**

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Late Filed Exhibit No. 10  
Beverly Y. Menard  
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**Carriers and Contacts for the Tampa Rate Center Change**

The following carriers were notified by certified mail at the following addresses:

OCN 2839 Net-Tel Corporation - FL  
3050 K Street NS Suite 250  
Washington, DC 20007

3046 Maxcess, Inc. - FL  
315 South Calhoun Street  
Tallahassee, FL 32301

4085 Florida Digital Network  
1199 Noth Orange Avenue  
Orlando, FL 32804  
(Was returned with no forwarding address)

4233 Gabriel Wireless, LLC  
879 Dover Street  
Boca Raton, FL 33487

4616 ITC Delta Com - FL  
PO Box 787  
1530 Deltacomm Drive  
Anniston, AL 36202

6100 Nextlink Florida, Inc. - FL  
500 108th St NE  
Bellevue, WA 98004

6385 Pagemart, Inc.  
3333 Lee Parkway Ste 100  
Dallas, TX 75219

6473 Wireless One Holding Company, L.P.  
2100 Electronics Ln  
Ft. Myers, FL 33912

FLORIDA PUBLIC SERVICE COMMISSION  
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DATE: 3-27-01

DOCUMENT NUMBER-DATE

04208 APR-5 01

FPSC-RECORDS/REPORTING

- 6483 TSR Wireless LLC  
2200 Fletcher Ave., 7th Floor  
Fort Lee, NJ 07024
- 6493 Arch Southeast Comm. DBA Interlink Paging - FL  
Not recognized address
- 6502 PCS Primeco - Florida  
Six Campus Circle  
Westlake, TX 76262
- 6521 Metrocall  
6677 Richamond Hwy  
Alexandria, VA 22310
- 6548 Priority Communications, Inc.  
1499 W. Palmetto Pk., Suite 405  
Boca Raton, FL 22486
- 6630 Arch Paging, Inc.  
6221 North O Connor  
Irving, TX 75039
- 6701 Aerial Communications  
8410 W. Bryn Mawr Ave.  
Chicago, IL 60631
- 6972 Gulfcoast Paging Inc.  
8910 N. Dale Mabry #6  
Tampa, FL 33614
- 7229 MCIMetro, ATS, Inc.  
8521 Leesburg Pike  
Vienna, VA 22182
- 7318 National Telecommunications of Florida, Inc.  
6363 NW 6th Way  
Ft. Lauderdale, FL 33309

- 7389 Geotek Communications, Inc.  
20 Craig Road  
Montvale, NJ 07645
- 7545 Winstar Wireless, Inc. - FL  
1577 Springhill Road, Suite 100, 5th Floor  
Vienna, VA 22182
- 7635 E.Spire Communications, Inc. - Jacksonville  
7125 Columbia Gateway Drive, Suite 200  
Columbia, MD 21046
- 7641 Conxus Spectrum Inc.  
12 North Main Street  
Greenville, SC 29601  
(Was returned with no forwarding address)
- 8592 Mpower Communications Corp. - FL  
3301 N. Buffalo Drive  
Las Vegas, NV 89129
- 8664 Intermedia Communications, Inc. - FL  
3625 Queen Palm Drive  
Tampa, FL 33619
- 8692 US Lec of Florida, Inc.  
Morrocroft III  
6801 Morrison Blvd.  
Charlotte, NC 28211

The following carriers were notified by registered email to the following personnel:

- OCN 2547 Frontier Local Services, Inc. - FL  
Susan Cicotta
- 4745 2nd Century Communications, Inc. - FL  
G.A. Zamore

- 4802 Level 3 Communications, LLC - FL  
Shirley Paswaters
- 6010 AT&T Wireless Services, Inc.  
Samuel Raymundo
- 6232 Nextel Communications  
Kathryn Barrett
- 6331 Airtouch Paging  
Joanne Edelman
- 6339 GTE Mobilnet of Tampa, Inc.  
Debbie Ruffin
- 6381 Pagenet  
[www.pagenet.com](http://www.pagenet.com)
- 6664 Sprint Spectrum L.P.  
Sandy Gever
- 6948 BellSouth Wireless, Inc.  
Charlotte Piper
- 7421 AT&T Local  
Kimberley Hutchison  
Timothy Barry
- 7437 Time Warner Communications AXS Florida - Orlando  
Teresa Newkirk
- 7448 Worldcom Technologies, Inc. - FL  
Cheryl Kizzee
- 8300 TCG South Florida  
Kim Hutchison
- 8388 Teligent, Inc. - FL  
Karen Harvey

- 8660 New South Communications, LLC - CLEC  
John Fury
- 8689 Business Telecom Inc. - FL  
Gina Latini
- 8982 KMC Telecom II, Inc. - FL  
Beverly McConnell

MESSER, CAPARELLO & SEL...  
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (850) 222-0720  
TELECOPIER: (850) 224-4359  
INTERNET: www.lawfla.com

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.

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FLORIDA PUBLIC SERVICE COMMISSION  
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COMPANY/  
WITNESS: Thomas  
DATE: 3-27-01

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.

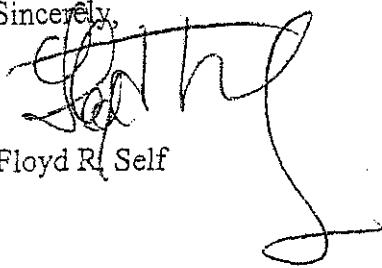
In terms of the present need, the ALECs need additional time to conduct their internal investigations and, in the case of NXX code needs, to get that information to the Commission so that it can compile a total NPA analysis. Given the fact that the current guidelines require at least 66 days to request and implement a new NXX code, the ALECs need to have their analysis completed no later than November 15<sup>th</sup> 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 1<sup>st</sup> 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 15<sup>th</sup> deadline. However, Verizon has indicated to us that it would be willing to delay the February 1<sup>st</sup> date upon a written request from the appropriate Commission Staff person in lieu of formal Commission action.

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.



Reply To:  
HQB11A06 - Irving, TX

August 15, 2000

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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RCI@WORLD.COM

08/31/00 11:36 FAX 8504222586

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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# 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,

  
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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NOV 20 2000

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Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

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215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (850) 222-0720  
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 25<sup>th</sup> 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 17<sup>th</sup>, 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 17<sup>th</sup> 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 17<sup>th</sup> 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 1<sup>st</sup> 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 17<sup>th</sup> letter, and the representations Verizon made to you that are reflected in that letter, we believe the

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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 17<sup>th</sup> 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

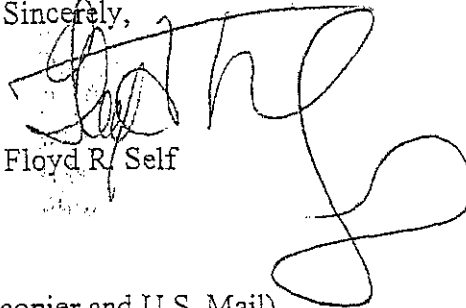
DOCKET 010102-TP  
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for retention as an undocketed matter unless you advise me that the Commission Clerk should record it as a docketed matter.

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)

**Craig Tystad**  
Time Warner Telecom  
5613 DTC Parkway  
Englewood, CO, 80111  
(303) 566-6014

## Summary of Qualifications

- Nineteen years in the engineering and operations areas of telecommunications.
- A comprehensive knowledge of telephony networks and products.
- Strong leadership abilities in vendor management, financial controls, equipment selection & procurement, and inventory control.
- Solid skills in strategic planning, defining business needs, and developing solutions to meeting services objectives.

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## Experience

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**Director of Operations Planning**  
Time Warner Telecom  
Denver, Colorado, 1997 - present

Set Company direction and policy in relation to operation support systems, new technology implementation, and new product development.

- Leading the concept design, selection, and implementation of the operational support systems for switched and transport services.
- Directing the implementation team for TWTC's electronic bonding with trading partners solution.
- Own TWTC's policy and processes for telephone number administration.
- Liaison with regulatory department to develop policy and legal positions.
- My team represents TWTC in industry forums (LNP, INC, OBF).

**Director of Switching Operations**  
Time Warner Telecom  
Denver, Colorado, 1993 - 1997

Plan and implement TWTC's switching services as a CLEC in a competitive environment.

- Managed all aspects of switched services: service provisioning, networks inventory, capacity management, telephony number administration, inter-company compensation, message processing, switch surveillance, and trouble management of 17 Lucent 5ESS.
- Rolled out residential dialtone services over Time Warner's cable TV network via hybrid fiber coax (HFC) technology.
- Hired an experienced and strong staff of technical experts to design, implement, provision and maintain TWTC's Network.

FLORIDA PUBLIC SERVICE COMMISSION

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COMPANY/

WITNESS: Tystad

DATE: 3-5-97 CT-1

### **Manager of Equipment Engineering**

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US West Communications  
Omaha, Nebraska, 1990-1993

Develop a highly effective engineering team and made Omaha, NE the testing ground of US WEST Communications' networks.

- Develop & manage \$43 million central office equipment capital budget.
- Maintain the 1992 capital budget within 1% of plan.
- Lead the engineering component of PC/Phone trial, to provided ubiquitous ISDN across all Omaha metro locations.
- Lead Omaha performance monitoring field trial. This involved installing DACS in 11 Central Offices and aggressively cutting all new and existing service onto the DACS. This resulted in improved Customer HICAP services for provisioning and maintenance.

### **Manager of Operations—Switching & Toll**

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US West Communications  
Nebraska & South Dakota, 1979 – 1990

Lead an aggressively effort to update the technology in Nebraska from analog technology to digital technology.

- Managed 71 people in the switching and toll department for outstate Nebraska.
- Four year program to upgrade 98 central offices.
- Five year program to upgrade 1700+ miles of toll facilities to fiber.
- Planned and organized the implementation of the Grand Island ESS Switching Control Center. Managed the Toll and Switching Control Center for outstate Nebraska.
- Planned, coordinated, and managed the conversion of three access tandems.

