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RECORDS AND
REPORTING

April 10, 2001

BY HAND DELIVERY

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

Re: FPSC Docket Nos. 990455-TL and 990457-TL

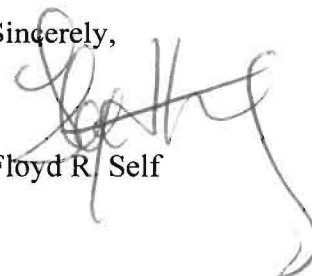
Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of Local Exchange Companies' Notice to the Florida Public Service Commission to Establish Implementation Schedules for the 305 - Monroe County and 954 - Broward County Area Code Relief Plans Pursuant to Order No. PSC-00-1937-PAA-TL to be filed in the above referenced dockets.

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

Thank you for your assistance with this filing.


Sincerely,


Floyd R. Self

FRS/amb
Enclosure
cc: Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04437 APR 10 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of Proposed)
Numbering Plan Relief for the 305/786 Area)
Code – Dade County and Monroe County/Keys)
Region)
_____)

Docket No. 990455-TL

In re: Request for Review of Proposed)
Numbering Plan Relief for the 954 Area)
Code – Broward County)
_____)

Docket No. 990457-TL
Filed: April 10, 2001

LOCAL EXCHANGE COMPANIES' NOTICE TO THE FLORIDA PUBLIC SERVICE COMMISSION TO ESTABLISH IMPLEMENTATION SCHEDULES FOR THE 305 - MONROE COUNTY AND 954 – BROWARD COUNTY AREA CODE RELIEF PLANS PURSUANT TO ORDER NO. PSC-00-1937-PAA-TL

Pursuant to the Florida Public Service Commission's ("FPSC's or Commission's") Order No. PSC-00-1937-PAA-TL ("PSC-00-1937") issued October 20, 2000, the FPSC withheld approval of an implementation schedule for the 954 and 305/786, pending the outcome of the various conservation measures. The Commission directed the local exchange companies ("LECs") in the affected area codes to jointly file a notice no later than October 1, 2001. The notice is to provide the Commission with the outcome of the various number conservation measures ordered by the FPSC and to recommend a specific permissive and mandatory dialing period for the 954 and 305/786 NPAs. The undersigned Industry Members respectfully request that the Commission adopt the implementation schedule and proposals identified in this Notice. In support of this notice, the Industry Members state:

I. Parties

1. The name, address, and telephone number of each Industry Member, and each Industry Member's representative(s), is attached hereto as Exhibit "A" and incorporated herein. Many of these Industry Members are LECs, but those that are not LECs are interested and/or affected by the implementation of area code relief in the 305/786 and 954 NPAs as code holders or potential code holders in the geographic areas served by these area codes.

2. Each Industry Member is an official party of record or interested party to one or all of the above referenced dockets. The Industry Members request that the Commission adopt the implementation schedule and proposals identified within this Notice.

DOCUMENT NUMBER-DATE
04437 APR 10 01
FPSC RECORDS/REPORTING

II. Background

3. On September 15, 1999, the Federal Communications Commission (FCC) issued an Order (FCC 99-249 or Florida Order) granting the Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures. In its Order, the FCC granted the Commission interim authority to implement various number conservation measures.

4. In Docket Nos. 990373-TP, 981444-TP, 990455-TP, 990456-TP, 990457-TP, and 990517-TP, the Commission investigated numerous area code relief proposals and various number conservation measures. Subsequent to the issuance of FCC's Florida Order, the Commission issued several orders in the dockets referenced above to implement the area code relief proposals and conservation measures.

III. Proposals and Implementation Schedule

A. 305/786 NPA

5. Pursuant to Order No. PSC-00-1937, the Commission adopted the extension of the 786 overlay as the appropriate area code relief mechanism for the portion of 305 area code that is in Monroe County. The relief mechanism would extend the 786 overlay that is currently implemented in Dade County to encompass the Monroe County area currently served via the 305 area code (the Florida Keys or Keys). However, the FPSC delayed establishing an implementation schedule until the evaluation of the impact of the various number conservation mechanisms ordered by the Commission.

6. Since the issuance of Order No. PSC-00-1937, the Commission has adopted proposals to implement Rate Center Consolidation ("RCC") and number pooling in the Keys. See Order Nos. PSC-01-0091-PAA-TL and PSC-01-0808-AS-TL. Although a specific schedule has not been established for RCC, BellSouth is scheduled to complete implementation of RCC in the 4th quarter of this year. As for number pooling, the industry is scheduled to implement number pooling trial for the Keys on May 28, 2001, with a pooling assessment meeting scheduled for May 1, 2001.

7. As of March 1, 2001, there are only 11 NXXs in the 305 NPA still available for assignment in the Keys. The current projected exhaust date of the 305 area code is October 2001. Since there are no number conservation measures implemented at this time nor will there be until May 28, 2001, the industry believes it is appropriate to begin the process to extend the 786 overlay into the Florida Keys as soon as possible to help ensure the continued availability of NXX codes within the Keys.

8. Pursuant to Order No. PSC-00-1937, the LECs were required to provide notice to the alarm industry 9 months prior to the implementation of the mandatory dialing for the extended overlay. On April 3, 2001, the alarm companies were provided notice that the industry would be that the Commission to implement the adopted area code relief mechanism in the Keys.

9. Due to the relatively few available 305 NXXs available for assignment and the uncertainty of the impact of number pooling, the Industry Members believe the Commission should establish the following implementation schedule for the portion of the 305 area code serving the Florida Keys:

Beginning of Permissive 7 or 10 Digit Local Dialing – 8/1/01

Beginning of Mandatory 10 Digit Local Dialing – 11/1/01

10. The Industry members believe that the implementation of pooling and RCC has the potential to provide some relief for the Keys in extending the life of the 305 NPA. However, the limited number of NXXs available for assignment to non-pooling carriers may seriously jeopardize the ability of non-pooling carriers to provide service to customers, since they will still need to be able to receive a full NXX when requesting a code.

Conclusion

11. The Industry Members are still committed to implement the various number conservation measures ordered by the Commission, and such efforts should extend the life of the 305 area code in the Keys. However, the availability of such a limited number of full NXX codes for the non-pooling carriers and new entrant pooling carriers could create a situation where carriers may not be able to get numbering resources to serve their customers. Accordingly, the Industry Members respectively request that the Commission adopt the proposed implementation schedule in paragraph 9 above to provide telephone numbers for carriers in the Keys.

B. 954 NPA

12. Pursuant to Order No. PSC-00-1937, the Commission adopted an overlay as the appropriate relief mechanism for the 954 area code. The relief mechanism would implement a new area code (754) as an overlay to the existing 954 area code. However, as with the 305/786 relief mechanism, the Commission decided not to establish an implementation schedule in order to evaluate the impact of the various number conservation mechanisms being implemented in the Broward County area.

13. On January 22, 2001, the industry implemented number pooling in the 954 area code using only non-contaminated thousand blocks. Since the initial implementation, the industry has donated contaminated blocks in two of the five exchanges and will donate the remainder of the contaminated blocks for other exchanges on April 27, 2001. Due to the short period since the pooling in the 954 area code has been implemented and the continued rationing of codes, the industry is unable to evaluate the impact of pooling in this area code to determine the effectiveness of pooling.

14. As of March 1, 2001, there were 112 NXXs that are unassigned in the 954 area code with a projected exhaust date of 3rd quarter 2002 and 144 NXXs that are unassigned in the 561 area code with a projected exhaust date of 3rd quarter 2002. Due to the 7-digit dialed EAS routes between Broward County exchanges (Deerfield Beach, Pompano Beach, and Coral Springs) and Palm Beach County exchanges (Delray Beach and Boca Raton), the majority of available codes are protected due to code conflicts. Currently, only 12 NXXs in the 954 NPA can be assigned in the Ft. Lauderdale, Deerfield Beach, Pompano Beach, and Coral Springs exchanges without creating a code conflict with NXXs in the 561 NPA. It should be noted that only 6 NXXs are available for assignment in the Boca Raton and Delray Beach exchanges due to the code conflicts. On March 25, 2001, the North American Numbering Administrator noticed an industry meeting to address code rationing procedures for the 954 and 561 area codes.

15. The industry believes there are essentially two alternatives that will eliminate the code conflicts, allow carriers access to numbering resources, and minimize any potential technical problems. First, the Commission could change the EAS dialing between the counties from 7 to 1+10 digit dialing. Second, the Commission could implement the overlay adopted in Order No. PSC-00-1937 for the 954 area code.

1. Option 1 - Change 7 to 1+10 Digit Dialing

16. If the Commission decided to change the EAS dialing from 7 to 1+10 digit dialing between Palm Beach and Broward counties, the Commission should begin permissive dialing 60 days after the Commission issues a final order. Mandatory dialing should begin 60 days after the start of permissive dialing. This time frame will provide customers the opportunity to get any modifications that would be necessary before mandatory dialing. Depending on how alarm companies monitor the North Broward County exchanges, it may be necessary to reprogram some of the auto-dialers in a customer's premise.

17. Normally, the Commission would implement 10-digit dialing on inter-NPA routes. However, due to a code conflict with the 561 NXX in Ft. Lauderdale and the 561 NPA, implementation of 10-digit dialing would require an inter-digital timing delay of 4 to 6 seconds. The Industry Members do not believe such a delay is appropriate for this particular situation. The other possible option to the Commission is to change the route from 7-digit to 1+10 digit dialing.

18. The Industry Members believe that the main benefit of this proposal is that the industry can implement the dialing change in a short timeframe. However, it should be pointed out that there may be some customer confusion due to the changing of the dialing patterns twice during a relatively short period of time and over whether a call will be billed as local or toll. Additionally, the Commission should be aware that customers' calls could be routed to inappropriate locations if the customer does not dial the 1 when making a call on these routes. As the Commission is well aware, there have been some customer complaints filed with the Commission on this issue in the past.

2. Option 2 - Implement Overlay

19. If the Commission decided to immediately implement the 754 overlay, the industry believes it would need to do so in a two-phase approach. Basically, Phase I would implement 7 to 10 digit permissive dialing within Broward County for the 954 area code as well as implement 754 on a mandatory 10-digit basis at the same time. Once Broward County reaches mandatory 10-digit dialing within and between the 754 and 954 area codes, the Commission may address the 954/754-561 EAS routes. Phase II would implement for the 954/754-561 EAS routes permissive 7 or 10 digit dialing, with later 10 digit mandatory dialing for these EAS between Broward and Palm Beach Counties.

20. As for the implementation timeframe for Phase I, the industry would propose the Commission begin permissive dialing within Broward County 954 NPA 60 days after the Commission issues its final order. The permissive dialing in the 954 NPA should continue for at least 6 months to provide the alarm industry sufficient time to make the necessary changes to their auto-dialers. The industry believes 754 should be implemented on a mandatory 10 digit basis at the beginning of permissive dialing for the 954 area code in order to make NXX codes available in the new area code as soon as possible in the event the 954 NPA runs out of codes before the end of the permissive period in Phase I.

21. The Industry Members believe implementation of 7 to 10 digit permissive dialing for Phase II should begin 30 days after the completion of Phase I. Mandatory 10 digitdialing for the 954/754-561 inter-NPA EAS routes should be implemented 120 days thereafter.

22. The main benefit of this proposal is the easiest possible transition to implement the 754 overlay while minimizing any customer confusion associated with the potential dialing changes. In addition, the proposal will ensure that carriers continue to have access to numbering resources. However, the major drawback of the proposal is the implementation of the overlay when there are still some 954 codes available for assignment.

Conclusion

23. The industry proposes the Commission implement Option 2 - Phased Overlay approach as discussed above due mainly to the potential for customer confusion and problems associated with incorrect routing of calls with Option 1. Although, Option 2 may prohibit carriers from getting 954 codes during the Phase I permissive dialing period, carriers would be able to be assigned 754 codes for the numbering needs at the beginning of Phase I.

WHEREFORE, the Industry Members have prepared this Notice pursuant to Commission Order No. PSC-00-1937. The undersigned respectfully request that the Commission extend the 786 area code for the portion of Monroe County served by 305 on the timeframe discusses above. Further, the Industry members request that the Commission implement Option 2 as discussed above for relief of the 954 area code.

Signatures continue on following pages.

EXHIBIT "A"

The name, address, and telephone number of this Industry Member joining in this Notice is: _____ [TYPE IN YOUR COMPANY NAME AND ADDRESS].

The names, address, and telephone numbers of _____'s representatives in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature for this Industry Member. .

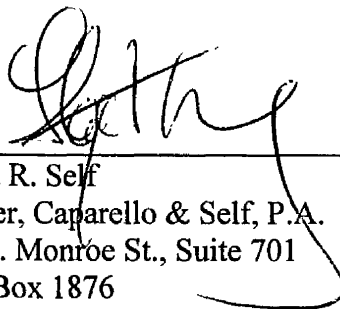
name
company name
address
phone number

name) Attorneys for _____ (company

EXHIBIT "A"

The name, address, and telephone number of this Industry Member is: AT&T Communications of the Southern States, Inc., 101 N. Monroe St., Suite 700, Tallahassee, Florida 32301, and AT&T Wireless Services, Inc., P.O. Box 97061, Redmond, Washington 98073-9761 (collectively "AT&T").

The names, address, and telephone numbers of AT&T's representatives in connection with this Notice for purposes of service in this matter is set forth below the authorized signature for this Industry Member.



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Attorneys for AT&T Communications of the
Southern States, Inc. and AT&T Wireless
Services, Inc.

EXHIBIT "A"

The name, address, and telephone number of this Industry Member joining in this Notice is: BellSouth Telecommunications, Inc., 150 South Monroe Street, Tallahassee, Florida 32301.

The name, address, and telephone number of BellSouth's representatives in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature for this Industry Member. .

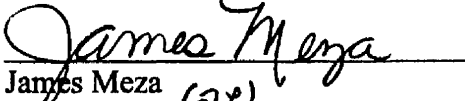


James Meza (22)
Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Tallahassee, Florida 32301
(850) 222-1201

EXHIBIT "A"

The name, address, and telephone number of this Industry Member joining in this Notice is:

Florida Cable Telecommunications Association
246 E. Park Avenue
Tallahassee, FL 32303
850/681-1990

The names, address, and telephone numbers of Florida Cable Telecommunications Association's representatives in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature for this Industry Member.


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Vice President, Regulatory Affairs and Regulatory Counsel
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850/681-1990
850/681-9676 (fax)
mgross@fcta.com

Attorney for Florida Cable Telecommunications
Association

EXHIBIT "A"

The name, address, and telephone number of this Industry Member joining in this Notice is: Intermedia Communications Inc., One Intermedia Way, Tampa, FL 33647.

The names, address, and telephone numbers of Intermedia's representatives in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature for this Industry Member.



Scott A. Sapperstein
Intermedia Communications Inc.
One Intermedia Way
Tampa, FL 33647
813-829-4093

Attorney for Intermedia Communications Inc.

EXHIBIT "A"

The name, address, and telephone number of this Industry Member joining in this Notice is: Verizon Florida Inc., P. O. Box 110, FLTC0007, Tampa, FL 33601-0110

The names, address, and telephone numbers of Verizon's representative in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature for this Industry Member.

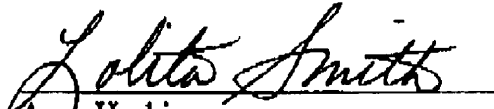
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Attorney for Verizon Florida Inc.

EXHIBIT "A"

Verizon Wireless joins in this Notice. The names, address, and telephone numbers of Verizon Wireless' representatives in connection with this Notice for purposes of service in this matter is set forth below following the authorized signature.



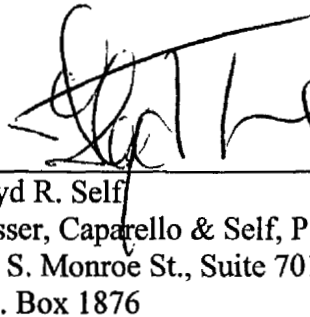
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Attorneys for Verizon Wireless

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The name, address, and telephone number of this Industry Member is:
WorldCom, Inc. and its operating subsidiaries, ("WorldCom"), 325 John Knox Road,
Suite 105, Tallahassee, FL 32303,

The names, address, and telephone numbers of WorldCom's representatives in
connection with this Notice for purposes of service in this matter is forth below the
authorized signature for this Industry Member.



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Attorneys for WorldCom, Inc. and its operating
subsidiaries

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket Nos. 990455-TL and 990457-TL has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 10th day of April, 2001:

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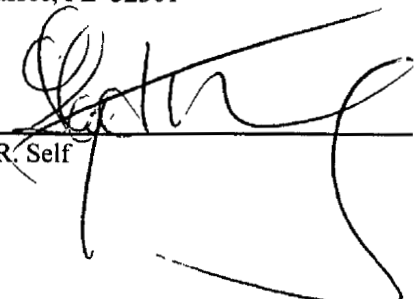
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