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April 13, 2001

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


**Re: Docket No. 010102-TP (Routing Database System (RDBS) and
Business Rating Input Database System (BRIDS))**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Leave to File *Amicus* Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


James Meza III
(JA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

DOCUMENT NUMBER-DATE

04583 APR 13 2001

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 010102-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 13th day of April, 2001 to the following:

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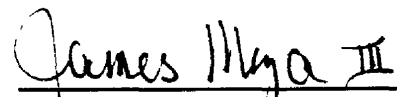
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James Meza III (KH)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of proposed) Docket No. 010102-TP
Updates to the Routing Data Base)
System (RDBS) and Business)
Rating Input Database System)
(BRIDS) affecting the Tampa)
telecommunications carriers) Filed: April 13, 2001

**MOTION FOR LEAVE TO FILE *AMICUS* BRIEF ON LIMITED
ISSUE OF WHETHER FPSC HAS AUTHORITY TO ORDER
RATE CENTER CONSOLIDATION**

BellSouth Telecommunications, Inc. ("BellSouth") requests that it be granted leave to file an *amicus* brief in this docket on the limited legal issue of whether the Florida Public Service Commission ("Commission") has the authority to order rate center consolidation. As grounds for this motion, BellSouth states:

1. On March 27, 2001, the Commission held a hearing between Verizon Florida, Inc. ("Verizon") and a host of ALECS regarding Verizon's attempt to reconcile the Local Exchange Routing Guide (LERG) and Vertical and Horizontal Terminating Point Master ("V+H/TPM") with its current Florida tariff language. BellSouth was not a party to this proceeding because it only involved Verizon in Verizon's historical franchise area and thus did not substantially affect BellSouth.

2. Although not present at the hearing, BellSouth understands that, during the hearing, the Commission specifically ordered the parties to brief the question of whether the Commission has the authority to order rate center consolidation as a numbering conservation measure. See Transcript at 310.

Prior to this time, upon information and belief, this specific legal issue was not identified in the prehearing order as an issue to be addressed in this proceeding.

3. BellSouth requests that it be allowed to file a brief to address this specific question for the following reasons:

a. The question of whether the Commission has the authority to order rate center consolidation is an industry-wide issue not limited to the parties in this proceeding. Indeed, the Commission previously ordered rate center consolidation in the 305 and 786 area codes for Dade County and Monroe County in Docket No. 990455-TL. BellSouth challenged this order but voluntarily agreed to implement rate center consolidation in Monroe County. As to Dade County, without addressing whether it had authority to order rate center consolidation, the Commission recently vacated the order requiring rate center consolidation. See Order No. PSC-01-0754-FOF-TL, March 23, 2001. Accordingly, the Commission would benefit from hearing the opinion of a major ILEC who would be substantially affected by a decision on this issue.

b. As the Commission knows, numbering conservation is a recurring issue that will only worsen over time as the available numbering resources are further depleted. Further, decisions regarding numbering conservation often have short time frames because of the constant threat of the total depletion of available numbers. Thus, by allowing BellSouth to participate on a limited basis in this proceeding, the Commission would

avoid time-consuming, piece-meal litigation of this issue when it arises again in BellSouth's franchise area.

c. BellSouth understands that the time period in which to intervene has expired; however, due to the fact that BellSouth only wishes to participate on a limited basis regarding a general legal issue and because, upon information and belief, the specific issue in question was first raised at the hearing, BellSouth submits that its limited participation through an *amicus* brief would not prejudice any party and would only benefit the Commission by having another opinion on an industry-wide legal issue.

4. If the Commission grants BellSouth's request to file an *amicus* brief, BellSouth fully intends to submit its brief by the current filing deadline – April 24, 2001.

5. On April 9, 2001, BellSouth contacted all parties to this proceeding to ascertain their position to BellSouth filing the instant motion. Public Counsel does not oppose this motion. Time Warner does not take a position. Verizon supports the motion. AT&T, WorldCom, and Intermedia do not have a position at this time. As of the filing of this motion, the remaining parties have yet to respond to BellSouth's request.

Respectfully submitted this 13th day of April, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



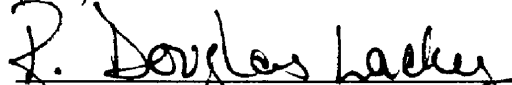
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