



Public Service Commission

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DATE: JUNE 28, 2001

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF COMPETITIVE SERVICES (ILERI) *ni* *as* *CPB* *PA*
DIVISION OF LEGAL SERVICES (FORDHAM) *C.F.F.* *bc*

RE: DOCKET NO. 010102-TP - INVESTIGATION OF PROPOSED UPDATES TO THE ROUTING DATA BASE SYSTEM (RDBS) AND BUSINESS RATING INPUT DATABASE SYSTEM (BRIDS) AFFECTING THE TAMPA TELECOMMUNICATIONS CARRIERS.

AGENDA: 7/10/01 - REGULAR AGENDA - POST HEARING DECISION - PARTICIPATION IS LIMITED TO COMMISSIONERS AND STAFF

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\010102C.RCM

DOCUMENT NUMBER-DATE
08007 JUN 28 2001
FPSC-RECORDS/REPORTING

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CASE BACKGROUND

On August 15, 2000, Verizon Florida, Inc. (Verizon) sent a letter to Tampa area code holders informing them of forthcoming updates to Telcordia's¹ Routing Database System (RDBS²) and Business Rating Input Database System (BRIDS³). (EXH 2) The updates, to be effective February 1, 2001, were intended to bring the Local Exchange Routing Guide (LERG)⁴ and Vertical and Horizontal Terminating Point Master (V+H/TPM)⁵ in sync with Verizon's current Florida tariff language. The letter notified the Tampa code holders that this would likely impact their entries in the RDBS and the BRIDS. (EXH 2)

On October 25, 2000, staff received a letter from an attorney on behalf of many Florida Alternate Local Exchange Companies (ALECs). (EXH 2) He expressed concerns over the impact Verizon's updates would have on ALECs in the Tampa area. On November 17, 2000, staff, via letter, asked Verizon to delay the changes pending a study to determine the impact on ALECs and numbering resources. (EXH 2)

On January 23, 2001, the Commission received a letter from the attorney seeking immediate assistance on behalf of various ALECs, including ALLTEL, Intermedia, Sprint, Time-Warner, and WorldCom. They had been advised by Telcordia that the proposed changes to the RDBS and BRIDS were going to be effective February 1, 2001,

¹ Telcordia Technologies is the industry routing and database administrator.

² RDBS is a centralized database used to collect pertinent data that supports the routing of local exchange calls within the Public Switched Telephone Network.

³ BRIDS is a centralized database used to collect pertinent data that supports the rating of local exchange calls within the Public Switched Telephone Network.

⁴ The LERG is a Bellcore document which lists all North American central offices and describes their relationship to tandem offices.

⁵ V&Hs were developed by the telecommunications industry to simplify the calculations needed to determine the straight-line airline distance between two sets of geographical points.

contrary to the Commission staff's November 17, 2000 request. (EXH 2)

On February 1, 2001, staff filed a recommendation proposing that the Commission order Verizon to halt any further actions to revise the RDBS and the BRIDS for the Tampa rate center. (EXH 1) On February 26, 2001, the Commission issued Order No. PSC-01-0456-PAA-TP, ordering that Verizon immediately cease any further actions to modify the RDBS and BRIDS as it relates to the Tampa Rate Center designation. (EXH 1) The matter was set for an administrative hearing on March 27, 2001. (EXH 1)

This recommendation addresses various issues raised by the industry members in regard to Verizon's updates to its RDBS and BRIDS systems.

JURISDICTION

This Commission has been authorized to address numbering issues pursuant to 47 U.S.C. §151 et. Seq., 47 C.F.R. §§ 52.3 and 52.19, FCC Order 99-249, FCC Order 00-104, and FCC Order 00-429. In accordance with 47 C.F.R. §§ 52.3:

The Commission (FCC) shall have exclusive authority over those portions of the North American Numbering Plan (NANP) that pertain to the United States. The Commission may delegate to the States or other entities any portion of such jurisdiction.

Furthermore, 47 C.F.R. §§ 52.19 provides, in part, that:

(a) State commissions may resolve matters involving the introduction of new area codes within their states. Such matters may include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education efforts regarding area code changes.

The FCC issued Order 99-249 on September 15, 1999, granting this Commission's Petition for Delegation of Additional Authority to

Implement Number Conservation Measures. Therein, the FCC granted the Commission interim authority to:

- (1) Institute thousand-block number pooling by all LNP-capable carriers in Florida;
- (2) Reclaim unused and reserved NXX⁶ codes;
- (3) Maintain rationing procedures for six months following area code relief;
- (4) Set numbering allocation standards;
- (5) Request number utilization data from all carriers;
- (6) Implement NXX code sharing; and
- (7) Implement rate center consolidations.

Furthermore, the Commission's jurisdiction as set forth in Section 364.01, Florida Statutes, is broad. Specifically, Section 364.01(2), Florida Statutes, gives the Commission ". . . exclusive jurisdiction in all matters set forth in this chapter to the Florida Public Service Commission in regulating telecommunications companies . . ." Subsection (4)(a) provides that the Commission shall "Protect the public health, safety, and welfare by ensuring that basic telecommunications services are available to all consumers in the state at reasonable and affordable prices." Subsection (4)(i) states that the Commission shall also "Continue its historical role as a surrogate for competition for monopoly services provided by local exchange telecommunications companies." Furthermore, Section 364.15, Florida Statutes, authorizes the Commission to compel repairs, improvements, changes, additions, or extensions to any telecommunications facility in order to promote the security or convenience of the public, or secure adequate service or facilities for telecommunications services.

Therefore, this Commission has the authority to address this matter.

⁶ NXXs are the first three digits of telephone numbers. They are also known as the Central Office Codes or prefixes.

DISCUSSION OF ISSUES

ISSUE A: Should BellSouth Telecommunications, Inc's (BellSouth) Motion for Leave to File Amicus Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation be granted?

RECOMMENDATION: Yes. BellSouth's Motion for Leave to File Amicus Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation should be granted. (FORDHAM)

STAFF ANALYSIS: On March 27, 2001, this Commission held an evidentiary hearing in this Docket. During that 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.

On April 13, 2001, BellSouth filed its Motion for Leave to File Amicus Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation. In that Motion, BellSouth asserted that it had no prior notice that the issue would be addressed, as it was not referenced in the Prehearing Order. BellSouth, further, pleads that the issue is of great industry-wide importance, and any decision by this Commission will impact all ILECS.

Staff agrees that the issue is of great importance to all carriers, and BellSouth has a substantial interest in any rulings on this subject by the Commission. Further, staff believes that the additional legal argument which may be provided by BellSouth will be beneficial in analyzing the issue. Accordingly, staff recommends that the Motion be granted.

ISSUE B: Under current Florida and Federal Law, what is the extent of the Commission's authority to order rate center consolidation?

RECOMMENDATION: While there are no explicit legal impediments to prevent the Commission from rendering a decision on this issue in this Docket, staff recommends that the issue of whether the Commission has authority to order rate center consolidation in the State of Florida should be deferred and addressed in a separate specific docket expeditiously. (FORDHAM)

POSITION OF THE PARTIES:

OPC: The Florida Public Service Commission has jurisdiction to order rate center consolidation, but it may not raise prices for price cap companies other than as allowed by Section 364.051, Florida Statutes.

JOINT⁷ It is not necessary for the Commission to address this legal question since it is possible to resolve the issues in this case without implementation of rate center consolidation. If the Commission feels compelled to examine the rate center question, it should do so in Docket No. 981444-TP on a generic basis with the involvement of all interested and affected parties.

VERIZON: The Commission has no authority to order rate center consolidation. This authority was removed with the 1995 changes to Chapter 364, and no federal law or FCC rulings restored it.

SPRINT: While the Federal Communications Commission has recognized state jurisdiction to order rate center consolidation pursuant to local ratemaking authority, the Commission does not have the authority to implement this jurisdiction under its statutorily delegated authority over telecommunications companies as set forth in chapter 364, Florida Statutes.

BELLSOUTH: No. The Commission does not have the authority to order BellSouth or any other price-regulated telecommunication company to implement rate center consolidation.

⁷ AT&T Communications of the Southern States, Inc., AT&T Wireless, Intermedia, Time Warner Telecom, WorldCom, Inc., and XO Florida, Inc.

STAFF ANALYSIS: During the March 27, 2001 administrative hearing, it was requested by the panel that legal briefs be filed in this docket addressing the Commission's authority to order rate center consolidation. Staff recognizes that this is an important issue regarding future number conservation efforts of the Commission and needs to be addressed. However, based on the manner in which the issue is now before the Commission, staff suggests that a better course of action would be for the Commission to defer consideration of this issue at this time.

This Docket, Docket No. 010102-TP, specifically addresses Tampa Rate Center issues. Only the few carriers providing service in the Tampa Bay area were made aware at the hearing that a generic decision determining whether the Commission has the authority to order rate center consolidation in Florida would be addressed in this docket. Therefore, the ALEC parties to this proceeding indicated in their post-hearing brief that the rate center consolidation issues for this docket should be examined in Docket No. 981444-TP, rather than in this Docket. (JOINT BR p.2) On April 13, 2001, BellSouth Telecommunications, Inc. (BellSouth) filed a "Motion for Leave to File an Amicus Brief" on the limited issue of whether the PSC has authority to order rate center consolidation. BellSouth was not a party to this docket, because it only involved Verizon's franchise area and it did not substantially affect BellSouth. In its post-hearing brief, however, BellSouth also stated that "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."

While notice is not an explicit legal impediment to the Commission rendering a decision on this issue at this time, due to the broad nature of the issue and its potential impact on carriers not parties this proceeding, staff believes that this matter should be deferred and more fully addressed in a separate proceeding. As noted in the Joint Posthearing Brief of the ALECs, under the doctrine of judicial restraint, "a court is limited to deciding only questions properly presented to it and necessary to the determination of the case." Citing Shands Teaching Hospital & Clinics, Inc. v. Smith, 480 So. 2d 1366, 1368 (Barfield, concurring) (Fla. 1st DCA 1985). While staff does not believe that this operates to prohibit the Commission from rendering a decision on the legal issue before it, particularly since the issue pertains to the Commission's jurisdiction, staff does believe the ALECs' concerns regarding the Commission's consideration of this issue in

this proceeding merit consideration. Staff emphasizes that its recommendations on the technical issues in this docket do not hinge on the Commission rendering a decision on this legal issue; as such, deferring consideration of this matter will not impair the Commission's consideration of the remaining issues.

However, if pressed, staff does believe that it could adequately defend a decision by the Commission that it does have jurisdiction to require rate center consolidation. Verizon, Sprint, and BellSouth each argue that the Commission does not have jurisdiction in this area for any of the price-regulated ILECs, because rate center consolidation is the functional equivalent to the creation of Extended Calling Service or Extended Area Service, which the Commission clearly can no longer order for these companies. Furthermore, they contend that rate center consolidation would necessitate an increase in their rates above that allowed by Section 364.051, Florida Statutes. The ALECs did not address the legal aspects of this issue in their Joint Post-Hearing Brief, other than to say that they believe the issue should be deferred. OPC, on the other hand, contends that the Commission does have broad authority under Sections 364.01, 364.15, and 364.345, Florida Statutes, and that this authority should be construed in its broadest sense to include the authority to require rate center consolidation--as long as the requirement does not cause rates to exceed that which is allowed in Section 364.051, Florida Statutes. OPC further contends that rate center consolidation should not be confused with Extended Area Service (EAS), because EAS is a switching and trunking arrangement, while rate center consolidation simply creates one rate center out of many. It is not an arrangement for calling between exchanges; it is, instead, the creation on one consolidated exchange. Thus, based on the Commission's jurisdiction over certificates and telecommunications facilities, OPC believes that the Commission has the authority to order rate center consolidation. If the Commission believes that it should make a decision at this time, staff believes that an analysis similar to that proffered by OPC could provide the Commission with a supportable basis for deciding it has authority in this area.

Staff also emphasizes that staff believes this issue requires much greater study, not only regarding the legal aspects, but also the impact of any decision in this matter on the policy considerations associated therewith. In order to achieve a finding which will endure and withstand both the legal and policy

challenges which may follow, staff urges the Commission to defer consideration at this time to allow staff to expeditiously open a separate docket in which we can conduct a more in-depth analysis, in isolation of other distractions.

Therefore, staff recommends that the issue of whether the Commission has authority to order rate center consolidation in the State of Florida should be deferred and addressed in a separate and specific Docket expeditiously. Staff notes that if the Commission approves this recommendation, it intends to open a generic Docket specifically addressing the legal and technical aspects of rate center consolidation so that this issue can be given a full airing.

DATE: JUNE 28, 2001

ISSUE 1: Should the Tampa Market Area be considered one rate center? If not, what rate centers should be associated with the Tampa Market Area?

RECOMMENDATION: No, the Tampa Market Area should not be considered one rate center. Staff recommends the Tampa Rate Center, located within the Tampa Market Area, should consist of the Tampa Central, Tampa North, Tampa East, Tampa South, and Tampa West rate centers. Staff also recommends that all existing customers in the 813 area code be grandfathered as described in Verizon's proposal, but with a modification. The grandfathered customers should be allowed to maintain their telephone numbers regardless of whether they change carriers, as long as they are at the same location. In addition, all existing calling scopes should be maintained exactly in place for billing and number portability purposes, and the V+H/TPM coordinates in the existing Tampa region should be preserved. Furthermore, the ALECs should provide staff with a list of all grandfathered NXXs by October 2, 2001, to enable staff to review the effect of the modified grandfathering proposal on ALECs and customers within five years. (ILERI)

POSITION OF THE PARTIES:

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

JOINT: There has always been one rate center for Tampa, and Verizon should reverse the changes that were made in the LERG effective February 1, 2001, to create five geographic rate centers. It is the LERG, and not Verizon's tariff, that the industry relies upon for routing and rating.

TIME WARNER: There has always been one rate center for Tampa, and Verizon should reverse the changes effective February 1, 2001, that were made in the LERG to create five geographic rate centers. It is the LERG, and not Verizon's tariff, that the industry relies upon for routing and rating.

VERIZON: No. The Tampa Market Area encompasses all of Verizon's territory, and thus all of its rate centers. The Commission cannot lawfully order Verizon to consolidate all (or any) of its rate centers. Rather, the incorrect "Tampa" LERG designation should be changed to reflect the existing five Tampa rate centers.

STAFF ANALYSIS: The Tampa Rate Center problems began when the Tampa central office code assignment duties were switched from Verizon (then known as GTE) to NeuStar in 1998. When Verizon handled the code assignment responsibilities, each code assignment was done manually and assigned to one of the five Tampa rate centers. When NeuStar assumed the code assignment responsibilities, it declined to manually process the code assignment requests. Instead, each new code assignment in the Tampa area was assigned as just Tampa, instead of to a specific rate center in Tampa. As a result, Verizon recognizes five rate centers in the Tampa area while ALECs recognize one rate center for the Tampa area. Since the time NeuStar assumed the code assignment responsibilities, carriers have been able to obtain a single NXX and use it throughout Verizon's five rate centers. Verizon believes that the carriers should recognize the five rate centers, and be required to obtain NXXs in each rate center in which they choose to do business.

Based on the evidence in the record, staff believes there are six factors which need to be examined when determining whether Tampa should be considered one rate center or five rate centers:

- 1) Tampa Market Area vs Tampa Rate Center;
- 2) Tampa Rate Center History;
- 3) Grandfathering of Existing Customers;
- 4) Number Portability;
- 5) Calling Scopes; and
- 6) Customer Rates.

TAMPA MARKET AREA vs TAMPA RATE CENTER - Based on the testimonies filed by the parties in this docket, staff believes that there is a misunderstanding as to what defines the Tampa Market Area. (TR 235, 238-241, 245, 278-282, 287; OPC BR p.4; JOINT BR p.4) According to the Florida Telecommunications Industry Association, the State of Florida was divided by pre-defined Local Access and Transport Areas (LATAs). The Tampa Market Area LATA consists of the 727, 813, and portions of the 863 and 941 area codes. (EXH 1)

In its post hearing statements, Verizon makes the distinction between the Tampa Rate Center and Tampa Market Area. (Verizon BR p.5 and 18) Staff notes that the Tampa Market Area rate centers consist of Tampa, Plant City, Zephyrhills, Hudson, New Port Richey, Clearwater, St. Petersburg, Palmetto, Bradenton, Myakka, Sarasota, Venice, North Port, Englewood, Lakeland, Polk City, Haines City, Winter Haven, Bartow, Mulberry, Lake Wales, Frostproof, and Indian

Lake. (EXH 1) Verizon witness Menard stated that the Tampa Rate Center consists of Tampa Central, Tampa North, Tampa East, Tampa South, and Tampa West Rate Centers, as illustrated in Figure 1. (TR 19)

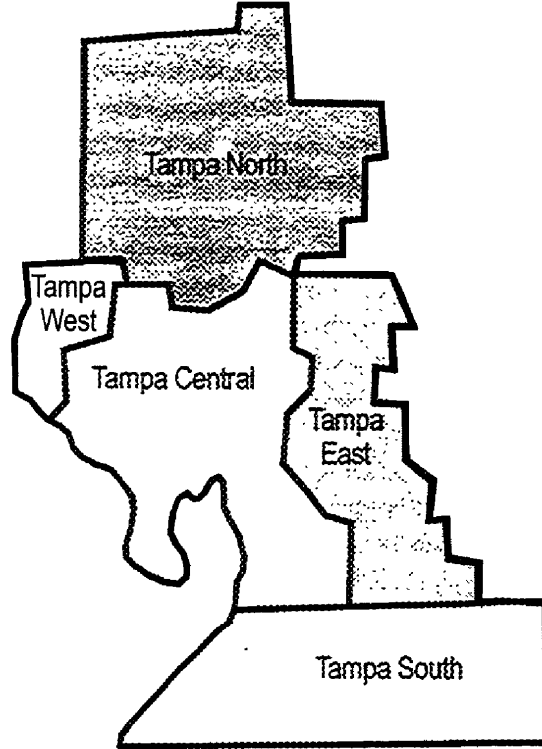


Figure 1: Schematic representation of Tampa rate centers in the 813 area code.

TAMPA RATE CENTER HISTORY - Verizon witness Menard testified that Verizon believes that the five rate centers in Tampa have existed for over 30 years. (TR 19) Further, she stated that the Commission's report on Extended Area Service (EAS) routes indicates that an EAS was created between Tampa South and Palmetto in 1969, and Tampa North and Zephyrhills in 1970. (TR 19)

When GTE Florida Inc. (now Verizon) was the central office code (NXX) administrator responsible for assigning NXX codes, the 813 area code encompassed GTE's territory and Sprint's territory. (TR 19) The code administrator was GTE, who determined the calling scope of any new NXX through a manual process. (TR 20) Witness Menard stated that after GTE transferred the code administration function, the new code administrator, NeuStar, stated that it would

not continue the manual process to assign NXX codes. (TR 21) Verizon claims that there was no designation of the proper Tampa rate center in the LERG, as a result of NeuStar's refusal to continue the manual process. (TR 20) WorldCom witness Thomas believes that Verizon's tariff does not match the information provided in the LERG. (TR 263)

Verizon witness Menard has demonstrated that section A.18 of the tariff shows the five Tampa rate centers, along with the required information for rating toll calls. (TR 23) Witness Menard also stated that all of Verizon's systems are programmed to recognize these five Tampa rate centers. (TR 41) AT&T witness Henderson agreed that Verizon's tariffs reflect five rate centers in Tampa. (TR 191) Staff notes that according to GTE Florida's General Services Tariff, issued June 8, 1998, March 11, 1996, June 9, 1993, and January 26, 1988, included all five Tampa rate centers. (EXH 5)

In Verizon's post hearing comments, witness Menard stated that Verizon's tariffs, not the LERG, are the definitive reference for determining how many rate centers Verizon has. Although the LERG is widely used by the industry as a reference, it is not approved by or otherwise officially sanctioned by this Commission. (TR 133-134.) It is not publicly available, but rather privately published by Telcordia and offered only by subscription. (TR 153, 161) Verizon's tariffs and accompanying area code maps, on the other hand, are Commission-approved, publicly filed, and have the force of law. While the tariffs and underlying rate centers have existed for over 30 years, the LERG was first published only about 17 years ago. (TR 161)

Verizon witness Menard stated that the existing Tampa rate center issues were discussed at an industry forum known as the Common Interest Group on Routing and Rating (CIGGR). (TR 21) In the later CIGGR meetings, discussions were held regarding how to route and rate the calls in the network using the LERG/RDBS. (TR 22) Witness Menard provided a list of industry participants showing that every ILEC and ALEC in the Tampa region was invited to these meetings.

GRANDFATHERING EXISTING CUSTOMERS - In the CIGGR meetings, witness Menard stated that it was Verizon's intention that grandfathering of all NXXs currently assigned in the 813 area code would be allowed. (TR 100) In addition, if the carrier did not direct its

NXXs to be located in a particular Tampa rate center, Verizon would assign these NXXs to the Tampa Central rate center. (TR 84) Witness Menard concluded that on a prospective basis, new NXXs in the 813 area code could be assigned to the proper Tampa rate center. (TR 100)

In his direct testimony, Intermedia witness Faul stated that if grandfathering were allowed in the 813 area code, the rating and routing problems would continue. (TR 215) Witness Faul stated that Verizon witness Menard claimed that Verizon could not properly rate calls from its end users unless the ALECs use the five rate center designations. (TR 215) Based on the evidence in the record, staff believes that rating and routing problems would continue if existing customers were grandfathered. In addition, witness Menard stated that the grandfathered customers would be allowed to add more lines in the ALECs' NXXs. (TR 26) However, on a prospective basis, new customers initiating service would not experience any routing or rating problems since they would be assigned to the rate center which they reside in. Based on the Commission's Comparative Rate Statistics, Verizon witness Menard's testimony, and other industry members' testimony, nearly all customers in the 813 area code are located in the Tampa Central area. (TR 39, 45, 48, 224, 261)

Staff notes that during the technical hearing, Intermedia witness Faul stated that if customers were grandfathered, they would not have to change telephone numbers under Verizon's proposal to grandfather all existing 813 NXX codes. (TR 226) Witness Faul stated that "...we would have probably some network changes to make, and I'm not sure what would happen with that." (TR 226) Based on the evidence provided in this proceeding, staff believes that there is insufficient evidence in the record to identify any potential network problem.

Staff is recommending that all existing customers in the 813 area code be grandfathered as described in Verizon's proposal, but with a modification. The grandfathered customers should be allowed to maintain their phone number regardless if they change carriers, as long as they are at the same location. Staff is also recommending that for rating purposes, the V+H/TPM coordinates in the existing Tampa region should be maintained if the 813 NXXs are grandfathered.

CALLING SCOPES - Verizon witness Menard stated that Verizon is not converting, expanding, or changing currently tariffed Tampa rate centers. Witness Menard stated that Verizon is only correcting the RDBS, and its output product, the LERG, to correspond to its switches and its tariff. These corrections will not change the ALECs' calling scopes. (TR 46) However, witness Menard stated that if the Commission requires rate center consolidation in the Tampa area, it would require additional facilities because customers' calling scopes would change and therefore Verizon would need to change the facilities that it has in place. (TR 135)

NUMBER PORTABILITY - The Telecommunications Act of 1996 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. (EXH 1)

Customers within the Tampa rate center are paying \$0.38 per month for number portability. (TR 118) This fee is being collected every month for a five-year period. Verizon has been collecting the local number portability charge for approximately two years. (TR 118)

Although Verizon witness Menard stated that the acknowledgment of five rate centers would allow its billing systems to work properly, the number portability issues for ALECs could be a potential problem. For example, Intermedia witness Faul stated that customers would be assigned new telephone numbers if new rate centers are established. (TR 208, 218-219) In fact, all of the ALECs claim that unless one Tampa rate center is maintained, the ALECs would need to change some of their customers' phone numbers because some customers' NXX would be served from a different Tampa rate center. (TR 241, 259, 266) However, if the grandfathering of existing customers is approved and existing customers are allowed to maintain their phone number as long as they are at the same location regardless of whether they change carriers, it appears that this would not be an issue.

The ALECs claim, and Verizon agrees in part, that ALECs may need to obtain additional NXX codes to serve their customers in other Tampa rate centers in the Tampa region. (TR 24, 175, 241,

249, 266) WorldCom witness Thomas stated that if the Tampa rate center were kept at status quo (one universal rate center), customers would be able to port their numbers "no matter where they were located." (TR 259)

AT&T witness Henderson stated that porting is allowed only within a rate center, and there are no exceptions. (TR 197) However, witness Henderson stated that if porting were allowed between rate centers, customers would not have to change their telephone numbers. (TR 198) WorldCom witness Thomas indicated that if the Tampa rate center had remained as it was prior to the February 1, 2001 changes by Verizon, customers would be able to port their numbers in the entire Tampa rate center, regardless of which switch they were homed at. (TR 260)

Verizon witness Menard stated that consistent rate centers are needed for porting purposes between the ALECs and Verizon. Witness Menard stated that Verizon cannot port a customer from Tampa West to Tampa Central because its systems are not designed to function that way. (TR 76-77) Witness Menard stated that Verizon proposed that all existing customers in the 813 area code, regardless of where they are located would be grandfathered so that customers would not be required to change telephone numbers unless the customers change carriers. (TR 47) Based on the evidence in the record, staff believes that this statement counters the intent of number portability. Number portability is intended to allow customers to maintain their telephone numbers when changing carriers. (EXH 1)

In this proceeding, staff notes that most of the parties, including Verizon, state that porting is allowed within a rate center. (TR 121, 176, 196-197, 259) Since porting was allowed in the existing Tampa rate center, staff believes that porting should still be allowed for grandfathered customers even if new rate center structures are established per Verizon's tariff. (TR 198) Grandfathered customers residing at the same location should be allowed permanent number portability no matter where they were originally assigned within the five rate center structure. This is what the customers have been paying for on their monthly bills as local number portability charges.

Staff believes it is crucial that grandfathered customers receive permanent local number portability capability. Customers should be allowed to maintain their phone number regardless if they

change carriers, as long as they are at the same location. As stated in FCC Order 96-286 (¶2), "Number Portability is one of the obligations that Congress imposed on all local exchange carriers, both incumbents and new entrants, in order to promote the pro-competitive, deregulatory markets it envisioned. Congress has recognized that number portability will lower barriers to entry and promote competition in the local exchange marketplace." (EXH 1) In Order 96-286 (¶30-31), the FCC stated that number portability promotes competition between telecommunications service providers by, among other things, allowing customers to respond to price and service changes without changing their phone numbers. Conversely, the lack of number portability likely would deter entry by competitive providers of local service because of the value customers place on retaining their telephone numbers. To the extent that customers are reluctant to change service providers due to the absence of number portability, demand for services provided by the new entrants will be depressed. This could well discourage entry by new service providers and thereby frustrate the pro-competitive goals of the 1996 Act. (EXH 1) In Order 97-289 (¶4), the FCC stated that in practical terms, the benefits of competition will not be realized if new facilities-based entrants are unable to win customers from incumbent providers as a result of economic or operational barriers. (EXH 1) Staff agrees with the FCC's analysis and believes it is applicable here.

Therefore, staff believes that all existing customers being grandfathered in Verizon's proposal, should be allowed permanent number portability, and be allowed to maintain their phone number regardless if they change carriers, as long as they are at the same location.

CUSTOMER RATES - In the Joint Posthearing Brief of AT&T Communications of the Southern States, Inc, AT&T Wireless Services, Inc., Intermedia Communications, Inc., Time Warner Telecom, WorldCom, Inc., and XO Florida, Inc., the parties stated "...the grandfathering proposal would create situations where a Verizon customer would be charged two different rates to call the same location."

Verizon witness Menard acknowledged that, under the grandfathering proposal, there would be instances where a customer would be charged two different rates for calling the same location. (TR 127) If a Sprint customer in Dade City calls two different friends who are ALEC customers who live on the same street in the

Tampa East rate center, the Sprint customer could pay an Extended Calling Service rate to one friend, but a toll call to another friend on the same street. (TR 128)

Verizon witness Menard stated that if Verizon were granted the assignment of NXXs based on the five Tampa rate center structure, customers' rates would not increase because Verizon would convert them to reflect how they were assigned in the LERG. (TR 126-127) Witness Menard also stated that there would not be any intercarrier compensation issue because all the systems would be converted to treat them the same. (TR 127)

CONCLUSION: The Tampa Market Area should not be considered one rate center. Staff recommends the Tampa Rate Center, located within the Tampa Market Area, should consist of the Tampa Central, Tampa North, Tampa East, Tampa South, and Tampa West rate centers. Staff also recommends that all existing customers in the 813 area code be grandfathered as described in Verizon's proposal, but with a modification. The grandfathered customers should be allowed to maintain their telephone numbers regardless of whether they change carriers, as long as they are at the same location. In addition, all existing calling scopes should be maintained exactly in place for billing and number portability purposes, and the V+H/TPM coordinates in the existing Tampa region should be preserved. Furthermore, the ALECs should provide staff with a list of all grandfathered NXXs by October 2, 2001, to enable staff to review the effect of the modified grandfathering proposal on ALECs and customers within five years.

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

RECOMMENDATION: The evidence in the record reflects that the establishment of five Tampa rate centers could cause the 813 area code to prematurely exhaust. However, if the Commission approves the modified grandfathering proposal for all NXXs, permanent local number portability for grandfathered customers, retaining the same local calling areas for all NXXs in the 813 area code (Issue 1) and a number pooling trial (Issue 4), staff believes that multiple rate centers would have minimal impact on the numbering resources for the Tampa area. (ILERI)

POSITIONS OF THE PARTIES:

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

JOINT: The introduction of five geographic rate centers for Tampa would lead to the premature exhaust of the 813 NPA, since the ALECs would have to obtain additional NXX codes to serve five rate centers instead of one. This is not in the best interest of the customers.

TIME WARNER: The introduction of five geographic rate centers for Tampa would lead to the premature exhaust of the 813 NPA, since the ALECs would have to obtain additional NXX codes to serve five rate centers instead of one. This is not in the best interest of the customers.

VERIZON: There are multiple rate centers in the Tampa area. Under Verizon's number pooling proposal, there will be little, if any, effect on the numbering resources in the Tampa area.

STAFF ANALYSIS: Regarding the impact of multiple rate centers on numbering resources, NANPA witness Foley stated that two scenarios may occur based on his specific assumptions. The first assumption is that the carriers identified in the LERG having operations in the 813 area code are accurate and each carrier uses only one Operating Company Number (OCN). Second, any new carriers entering the market in the Tampa area beyond those listed in the LERG are not taken into account. Third, the wireless carriers with CO codes in the Tampa rate center would not require any additional codes.

Finally, Verizon has sufficient CO codes in the proposed rate centers. (TR 154) These assumptions are included in the following scenarios:

First Scenario: Witness Foley stated that there are 32 wireline carriers that have 65 NXXs in the Tampa rate center. (TR 154) Witness Foley further stated that the forecasted growth of the 813 NPA is approximately four NXX codes per month. (TR 155) Witness Foley also stated that he considered the worst case scenario in which each wireline carrier would need an NXX code in each of the new rate centers. If each of the 65 NXX codes needs to be replicated in the four additional proposed rate centers, an additional 260 NXX codes will be required. (TR 155)

Second Scenario: Witness Foley stated that the existing NXX codes would be redistributed and new NXX codes would be assigned so that each carrier would hold a minimum of one code in each of the new rate centers. (TR 155) Witness Foley also stated that some carriers would need additional NXXs, while some would not. Witness Foley concluded that an additional 91 NXXs would be required in this scenario. (TR 155)

Staff notes that if the assumptions provided by NANPA witness Foley are accurate, staff believes that either scenario would cause the premature exhaust of the 813 NPA, or even place the 813 NPA in jeopardy of exhaust before NPA relief could be accomplished.

As discussed in staff's analysis in Issue 1, Verizon witness Menard stated that 98% of customers are located and served from the Tampa Central rate center. (TR 39, 45, 48, 224, 261) Verizon witness Menard also stated that if ALECs choose to serve customers who are located in other Tampa rate centers, ALECs will require additional NXX codes. (TR 24) Witness Menard asserted that Verizon is also concerned about the premature exhaust of the 813 area code. As a result, Verizon worked with NeuStar to make sure that the proper recognition of the Tampa rate center could be accommodated in the 813 area code. (TR 24)

There are 331 NXX codes available for assignment in the 813 area code. The current estimated exhaust date for the 813 area code is in the fourth quarter of 2006. (TR 24) Staff notes that this estimate does not incorporate the need for assigning additional NXX codes. Witness Menard stated that because of the FCC's March 31, 2000, Report and Order in CC Docket No. 99-200, the

Tampa Metropolitan Statistical Area (MSA), which includes the 813 area code, would eventually be included in the number pooling implementation schedule. (TR 24) However, staff notes that the FCC has not issued the implementation schedule yet. Verizon believes that the implementation of a number pooling trial in the Tampa MSA would conserve numbering resources in the 813 area code. (TR 24) Staff also notes that if rate center consolidation is approved, additional numbering resources will be preserved.

Staff agrees with Intermedia witness Faul who stated that for a number pooling trial to take place, the pooling should occur at the rate center level. (TR 210) If staff's recommendation in Issue 1 is approved for the Tampa region, all five rate centers would need to be pooled. Staff notes that whether there is one Tampa rate center or five Tampa rate centers, all of these rate centers are within the Tampa MSA. Therefore, if the Commission approves staff's recommendation in Issue 4, there would be one number pooling trial with all rate centers located in the Tampa MSA participating. All Local Number Portability (LNP)-capable carriers in the Tampa MSA should participate in the number pooling trials. (EXH 1)

CONCLUSION: The evidence in the record reflects that establishment of five Tampa rate centers could cause the 813 area code to prematurely exhaust. However, if the Commission approves grandfathering of all NXXs, implements permanent local number portability for grandfathered customers, retains the same local calling areas for all NXXs in the 813 area code (Issue 1) and implements a number pooling trial for the Tampa MSA (Issue 4), staff believes that multiple rate centers would have minimal impact on the numbering resources for the Tampa area. In fact, staff believes that the life of the 813 area code could increase upon implementing number pooling trials and rate center consolidation.

ISSUE 3: a) What effect will Verizon's changes to its RDBS and BRIDS have on other telecommunications carriers in the Tampa Market Area?

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

RECOMMENDATION: The effects of Verizon's changes to its RDBS and BRIDS, and the effect of one or more rate centers on telecommunication carriers in the Tampa Market Area are addressed in Issue 1. (ILERI)

POSITIONS OF THE PARTIES:

OPC: No position.

JOINT: a) Verizon's proposed changes would require the ALECs to reassign its existing NXX codes to one of the five geographic rate centers. In reassigning NXX codes, some customers will have to take telephone number changes. In addition, ALECs would have to obtain new NXX codes, leading to the premature exhaust of the 813 area code.

b) One rate center has been in effect since before the beginning of local competition, and its continuation is in the best interest of everyone. Changing to five rate centers would lead to the premature exhaust of the 813 NPA, customer telephone number changes, and other routing and customer service problems.

TIME WARNER: a) Verizon's proposed changes would require the ALECs to reassign its existing NXX codes to one of the five geographic rate centers. In reassigning NXX codes, some customers will have to take telephone number changes. In addition, ALECs would have to obtain new NXX codes, leading to the premature exhaust of the 813 area code.

b) One rate center has been in effect since before the beginning of local competition, and its continuation is in the best interest of everyone. Changing to five rate centers would lead to the premature exhaust of the 813 NPA, customer telephone number changes, and other routing and customer service problems.

VERIZON: There are already five Tampa rate centers. Changing the LERG and the underlying RDBS and BRIDS to recognize these existing

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five Tampa rate centers will have virtually no effect on other telecommunications carriers, and will ensure nondiscriminatory treatment of Verizon's customers.

STAFF ANALYSIS: The effects of Verizon's changes to its RDBS and BRIDS, and the effect of one or more rate centers on telecommunication carriers in the Tampa Market Area are addressed in Issue 1.

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

RECOMMENDATION: Yes. Staff recommends that a number pooling trial be implemented in the Tampa MSA beginning on October 1, 2001. The pooling trial should include all uncontaminated thousands-blocks, and all contaminated blocks with less than 10% contamination pursuant to the FCC's rules and orders. All LNP-capable carriers should participate in the pooling trial. (ILERI)

POSITIONS OF THE PARTIES:

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

JOINT: A number pooling trial would be appropriate for the Tampa area when the 813 comes into jeopardy if the national pooling process is unable to commence by that time. Given the current pooling trials implementation schedule for Florida, the earliest a new trial could start would be late November 2001 (60 days after the last currently schedule trial for the Ft. Pierce MSA).

TIME WARNER: A number pooling trial would be appropriate for the Tampa area when the 813 comes into jeopardy if the national pooling process is unable to commence by that time. Given the current pooling trials implementation schedule for Florida, the earliest a new trial could start would be late November 2001 (60 days after the last currently schedule trial for the Ft. Pierce MSA).

VERIZON: Verizon supports a number pooling trial in the Tampa MSA, as long as the Commission accepts Verizon's proposal to harmonize the LERG with Verizon's rate centers.

STAFF ANALYSIS: AT&T witness Henderson stated that number pooling would help to slow down the exhaust of the 813 area code. (TR 194) Staff agrees. Most ALECs point out that number pooling is an essential tool which will conserve numbering resources, and eventually slow down the exhaust of the 813 area code.

The parties have recommended different number pooling trial implementation dates. For example, Time Warner witness Tystad stated that the number pooling trial for the Tampa MSA should begin on July 1, 2001, while others say six months after the Commission

makes its decision. (TR 30, 129, 280; OPC Brief P.7) FCC Order No. 99-249 (¶19) stated:

After having implemented a thousands-block number pooling trial in one MSA, the Florida Commission may wish to expand to another MSA. Should it wish to do so, we direct the Florida Commission to allow sufficient transition time for carriers to undertake any necessary steps, such as modifying databases and upgrading switch software, to prepare for an expansion of thousands-block pooling to another MSA. In other words, start dates for thousands-block pooling trials in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps. The purpose of a staggered roll-out is to provide carriers time to upgrade or replace their Service Control Points and other components of their network, as necessary, if the increased volume of ported numbers as a result of the pooling trial requires them to do so.

Staff believes that pursuant to this FCC Order, pooling trials should be staggered. However, the FCC did not address how long the staggered implementation should be. In Commission Order No. PSC-00-1046-PAA-TP, issued May 30, 2000, the pooling trials for the 561 and 954 area codes began within 15 days apart from each other. (EXH 1)

On March 31, 2000, the FCC issued its First Report and Order setting three criteria necessary to initiate a number pooling trial. The FCC directed state commissions seeking thousands-block number pooling authority to demonstrate that: (1) an NPA in its state is in jeopardy; (2) the NPA in question has a remaining life span of at least a year; and (3) that the NPA is in one of the largest 100 MSAs, or alternatively, the majority of wireline carriers in the NPA are LNP-capable. (EXH 1) Although the 813 area code meets the last two criteria for a number pooling trial, the area code is not in jeopardy at this time. However, carriers are not impeded from voluntarily initiating a pooling trial. Staff notes that the FCC is expected to announce the roll-out schedule for number pooling in the top 100 MSAs later this year. (EXH 1)

Based on the evidence presented in this proceeding by all parties, staff recommends that a number pooling trial be implemented in the Tampa MSA beginning on October 1, 2001. The

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pooling trial should include all uncontaminated thousands-blocks, and all contaminated blocks with less than 10% contamination pursuant to the FCC's rules and orders. (EXH 1) All LNP-capable carriers should participate in the pooling trial. (EXH 1)

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

a) When should these measures be implemented?

b) How should the cost recovery be established?

RECOMMENDATION: Due to insufficient evidence in the record, staff recommends that the Commission address any further number conservation measures in Docket No. 981444-TP (Investigation into Number Conservation Measures: Number Utilization Study). (**ILERI**)

POSITIONS OF THE PARTIES:

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

JOINT: The best number conservation measure would be to retain the single rate center for Tampa, with Verizon changing its tariff to reflect five billing tiers for its customers. The implementation of any number conservation measures and the cost recovery for any such other measures should be addressed in Docket No. 981444-TP.

TIME WARNER: The best number conservation measure would be to retain the single rate center for Tampa, with Verizon changing its tariff to reflect five billing tiers for its customers. The implementation of any number conservation measures and the cost recovery for any such other measures should be addressed in Docket No. 981444-TP.

VERIZON: The Commission should not order any conservation measures other than a number pooling trial. No other measures are necessary to meet numbering resource concerns in association with correcting the LERG. Any other measures are properly considered in the generic number conservation docket already established.

STAFF ANALYSIS: Due to insufficient evidence in the record, staff recommends that the Commission address any further number conservation measures in Docket No. 981444-TP (Investigation into Number Conservation Measures: Number Utilization Study).

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

a) How many rate centers should be consolidated? and if so, how should it be implemented?

b) When should the rate center consolidation be effective?

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

RECOMMENDATION: If the Commission approves staff's recommendation in Issue B, Issue 6 becomes moot. (ILERI)

POSITIONS OF THE PARTIES:

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

JOINT: Adoption of a single Tampa rate center and five billing tiers in the Verizon tariff eliminated the need for rate center consolidation. Such billing tiers would allow Verizon to continue to route and bill calls to its customers without any changes for the customers or Verizon.

TIME WARNER: Adoption of a single Tampa rate center and five billing tiers in the Verizon tariff eliminated the need for rate center consolidation. Such billing tiers would allow Verizon to continue to route and bill calls to its customers without any changes for the customers or Verizon.

VERIZON: No. Verizon has not proposed any rate center consolidation, and the Commission cannot lawfully order Verizon to consolidate its Tampa (or other) rate centers.

STAFF ANALYSIS: In Issue B, staff's recommendation proposes that the issue of whether the Commission has authority to order rate center consolidation in the State of Florida should be deferred and addressed in a separate docket expeditiously. If the Commission

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approves staff's recommendation in Issue B, Issue 6 becomes moot. However, this does not preclude Verizon from voluntarily implementing rate center consolidation. As discussed in staff's analysis in Issue 1, staff believes that rate center consolidation could be beneficial to customers as well as carriers, and improve the utilization of numbering resources in the 813 area code. (EXH 1)

Conclusion: If the Commission approves staff's recommendation in Issue B, Issue 6 becomes moot.

ISSUE 7: Should Verizon be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems? If so, should Verizon be required to file a revised Tariff reflecting one Tampa Rate Center?

RECOMMENDATION: No. If the Commission approves staff's recommendation in Issue 1, Verizon should not be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems. (ILERI)

POSITIONS OF THE PARTIES:

OPC: The Tampa area should be treated as one rate center for ALECs.

JOINT: Yes, to both questions. Notwithstanding Verizon's tariff, there has been only one rate center for Tampa. The problems Verizon has identified are internal billing matters that can be resolved by establishing in the tariff billing tiers.

TIME WARNER: Yes, to both questions. Notwithstanding Verizon's tariff, there has been only one rate center for Tampa. The problems Verizon has identified are internal billing matters that can be resolved by establishing in the tariff billing tiers.

VERIZON: No. Verizon's changes to its own rate center designations did not affect any other carriers. Verizon cannot be required to file a tariff reflecting only one Tampa rate center without the Commission ordering rate center consolidation, which it cannot lawfully do.

STAFF ANALYSIS: Time Warner witness Thomas stated that Verizon should file a revised tariff. (TR 246) WorldCom witness Thomas also testified that a revised tariff should be filed. (TR 282) Both witnesses assume that this revision should be made so that Verizon's tariff reflects a single rate center. WorldCom witness Thomas stated that consolidating rate centers would require revising the tariff. (TR 253) Staff agrees that if rate center consolidation is approved, a new tariff would need to be filed.

If the Commission approves staff's recommendation in Issue 1, Verizon should not be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems.

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ISSUE 8: Should this docket be closed?

RECOMMENDATION: If the Commission approves staff's recommendations in Issues 1-7, this docket should be closed. (FORDHAM)

STAFF ANALYSIS: If the Commission approves staff's recommendations in Issues 1-7, this docket should be closed.

ISSUE AND RECOMMENDATION SUMMARY

ISSUE A: Should BellSouth Telecommunications, Inc's (BellSouth) Motion for Leave to File Amicus Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation be granted?

RECOMMENDATION: Yes. BellSouth's Motion for Leave to File Amicus Brief on Limited Issue of Whether FPSC Has Authority to Order Rate Center Consolidation should be granted. (FORDHAM)

ISSUE B: Under current Florida and Federal Law, what is the extent of the Commission's authority to order rate center consolidation?

RECOMMENDATION: While there are no explicit legal impediments to prevent the Commission from rendering a decision on this issue in this Docket, staff recommends that the issue of whether the Commission has authority to order rate center consolidation in the State of Florida should be deferred and addressed in a separate specific docket expeditiously. (FORDHAM)

ISSUE 1: Should the Tampa Market Area be considered one rate center? If not, what rate centers should be associated with the Tampa Market Area?

RECOMMENDATION: No, the Tampa Market Area should not be considered one rate center. Staff recommends the Tampa Rate Center, located within the Tampa Market Area, should consist of the Tampa Central, Tampa North, Tampa East, Tampa South, and Tampa West rate centers. Staff also recommends that all existing customers in the 813 area code be grandfathered as described in Verizon's proposal, but with a modification. The grandfathered customers should be allowed to maintain their telephone numbers regardless of whether they change carriers, as long as they are at the same location. In addition, all existing calling scopes should be maintained exactly in place for billing and number portability purposes, and the V+H/TPM coordinates in the existing Tampa region should be preserved. Furthermore, the ALECs should provide staff with a list of all grandfathered NXXs by October 2, 2001, to enable staff to review the effect of the modified grandfathering proposal on ALECs and customers within five years. (ILERI)

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

RECOMMENDATION: The evidence in the record reflects that the establishment of five Tampa rate centers could cause the 813 area code to prematurely exhaust. However, if the Commission approves the modified grandfathering proposal for all NXXs, permanent local number portability for grandfathered customers, retaining the same local calling areas for all NXXs in the 813 area code (Issue 1) and

a number pooling trial (Issue 4), staff believes that multiple rate centers would have minimal impact on the numbering resources for the Tampa area. (ILERI)

ISSUE 3: a) What effect will Verizon's changes to its RDBS and BRIDS have on other telecommunications carriers in the Tampa Market Area?

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

RECOMMENDATION: The effects of Verizon's changes to its RDBS and BRIDS, and the effect of one or more rate centers on telecommunication carriers in the Tampa Market Area are addressed in Issue 1. (ILERI)

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

RECOMMENDATION: Yes. Staff recommends that a number pooling trial be implemented in the Tampa MSA beginning on October 1, 2001. The pooling trial should include all uncontaminated thousands-blocks, and all contaminated blocks with less than 10% contamination pursuant to the FCC's rules and orders. All LNP-capable carriers should participate in the pooling trial. (ILERI)

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

a) When should these measures be implemented?

b) How should the cost recovery be established?

RECOMMENDATION: Due to insufficient evidence in the record, staff recommends that the Commission address any further number conservation measures in Docket No. 981444-TP (Investigation into Number Conservation Measures: Number Utilization Study). (ILERI)

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

a) How many rate centers should be consolidated? and if so, how should it be implemented?

b) When should the rate center consolidation be effective?

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

RECOMMENDATION: If the Commission approves staff's recommendation in Issue B, Issue 6 becomes moot. (ILERI)

ISSUE 7: Should Verizon be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems? If so, should Verizon be required to file a revised Tariff reflecting one Tampa Rate Center?

RECOMMENDATION: No. If the Commission approves staff's recommendation in Issue 1, Verizon should not be required to undo changes made prior to August 15, 2000, in its RDBS and BRIDS systems. (ILERI)

ISSUE 8: Should this docket be closed?

RECOMMENDATION: If the Commission approves staff's recommendations in Issues 1-7, this docket should be closed. (FORDHAM)