

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Investigation of Proposed Updates to the Routing )  
Data Base System (RDBS) and Business Rating ) Docket No. 010102-TP  
Input Database System (BRIDS) Affecting the ) Filed: August 15, 2001  
Tampa Telecommunications Carriers )  
\_\_\_\_\_)

**JOINT REQUEST FOR ORAL ARGUMENT  
ON  
JOINT MOTION FOR RECONSIDERATION OF  
ORDER NO. PSC-01-1577-FOF-TP  
TO CLARIFY THE NUMBER POOLING REQUIREMENTS**

AT&T Communications of the Southern States, Inc., and AT&T Wireless Services, Inc. (collectively "AT&T"), Intermedia Communications, Inc. ("Intermedia"), Time Warner Telecom, WorldCom, Inc. ("WorldCom") and XO Florida, Inc., (collectively, "Joint Parties"), pursuant to Rule 25-24.058, Florida Administrative Code, hereby request that the Florida Public Service Commission hear oral argument on its Motion for Reconsideration of Order No. PSC-01-1577-FOF-TP to Clarify the Number Pooling Requirements. In support of the request, states as follows:

1. On July 31, 2001, the Commission issued Order No. PSC-01-1577-FOF-TP ("Order No. 01-1577") attempting to resolve certain issues related to its investigation of Verizon's Tampa rate center. In particular, the Commission determined that number pooling would be implemented in Verizon's Tampa MSA.

2. As required by Rule 25-22.058, the instant Request for Oral Argument is filed with the Joint Parties Motion for Reconsideration of Order No. PSC-01-1577-FOF-TP To Clarify the Number Pooling Requirements.

3. In order to expeditiously proceed with the implementation of the requirements of Order No. 01-1577, the parties met with NeuStar on August 7, 2001 to discuss the implementation of the number pooling trial. In response to questions of several of the parties seeking to better understand the Order during this meeting, the Staff of the Commission provided additional information indicating their view as to the particular requirements needed to implement the Order. In addition, Verizon sent a letter to the parties on August 10, 2001, requesting that the parties inform Verizon of any intent to participate in the voluntary pooling trial for Tampa.

4. The absence of certain specific necessary information in the Order, the information conveyed by Staff in an attempt to be helpful to the parties, and the letter from Verizon, raises a number of questions regarding the implementation of number pooling which makes it very clear that nothing is clear regarding the particular requirements for implementation of number pooling in the Tampa MSA.

5. As discussed more fully in the Joint Parties Motion for Reconsideration, the Joint Parties seek clarification on several matters that must be resolved if the number pooling trial is to be implemented in an efficient and orderly manner. More specifically, the Joint Parties seek clarification of: a) whether the implementation of number pooling in this instance means that the steps necessary for the number pooling process have begun or that they are complete; b) whether participation in the number pooling trial is mandatory; the specific requirements of the Verizon proposal; d) whether “grandfathered” codes would have to participate in the pooling trial, whether or when thousands blocks from such codes would have to be donated after mandatory pooling, and the specific date upon which codes will be grandfathered; e) whether carriers will be allowed to assign any NXXs, including grandfathered codes, to the rate center that is appropriate their

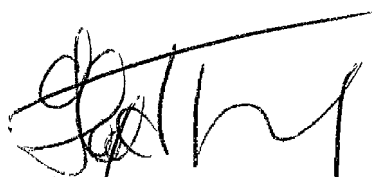
respective customers and businesses, and not arbitrarily to the Tampa Central rate center; f) whether the pooling trial will involve only the Tampa rate centers or whether the trial will extend to the entire Tampa MSA; and g) whether the number pooling trial will be subject to the guidelines found in the INC Thousands Block Number Pooling Administration Guidelines as well as any national requirements that may be adopted by the FCC.

6. As can be seen from the Motion for Reconsideration, there are substantial questions not answered by the Order as well as some confusion regarding the implementation of the number pooling trial. Answers to each of the questions for which clarification of the Order is sought are essential to the implementation of an efficient, expeditious and orderly number pooling trial in the Tampa MSA. There are myriad details inherent in the implementation of number pooling. In all past number pooling trials the affected parties engaged in extended discussions to plan for and resolve the types of questions raised by Order No. 01-1577. The absence of that kind of implementation dialogue and planning process in this case has left informational gaps in the implementation process which must be filled. The Motion for Reconsideration and the Request for Oral argument from the Joint Parties is now the only available vehicle to fill these gaps. Oral argument will greatly aid the Commission by allowing the parties to present the questions raised and seek guidance from the Commission in a quick, easy and efficient manner. Each of the questions raised by the Joint Parties requires a substantive discussion to insure that adequate and complete answers are derived that will allow prompt and efficient implementation of the number pooling trial. If oral argument is granted the Joint Parties will have their technical experts present to in order to facilitate the discussion and resolution of the questions raised. Without such discussion and clarification as to the specific requirements necessary to implement the number pooling trial,

the parties necessarily will be forced to file subsequent petitions for clarification or modification of the Order and the concomitant requests for stay simply to obtain the information necessary to complete the implementation process. The Commission's time and resources will be far better spent resolving the questions now with the aid of the appropriate input from the parties.

WHEREFORE, on the basis of the information contained herein, the Joint Parties respectfully request that the Florida Public Service commission grant oral argument on the Joint Parties Request for Reconsideration of Order No. 01-1577.

Respectfully submitted,



---

FLOYD R. SELF, ESQ.  
TRACY W. HATCH, ESQ.  
MESSER, CAPARELLO & SELF, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720

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

Jim Lamoureux, Esq.  
AT&T Communications of the Southern States, Inc.  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301

Attorney for AT&T Communications of the Southern States, Inc.

Scott Sapperstein, Esq.  
Intermedia Communications, Inc.  
M.C. FLT-HQ-3  
One Intermedia Way,  
Tampa, FL 33647-1752

Attorney for Intermedia Communications, Inc.

Karen M. Camechis  
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302

Attorney for Time Warner Telecom

Donna Canzano McNulty, Esq.  
WorldCom, Inc.  
The Atrium, Suite 105  
325 John Knox Road  
Tallahassee, FL 32303

Attorney for WorldCom, Inc.

Dana Shaffer  
XO Communications, Inc.  
105 Molly Street, Suite 300  
Nashville, Tennessee 37201-2315  
(615) 777-7700 Telephone  
(615) 345-1564 TelefaX

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of a Joint Request for Oral Argument on Joint Motion for Reconsideration of Order No. PSC-01-1577-FOF-TP to Clarify the Number Pooling Requirements in Docket 010102-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 15th day of August, 2001.

Lee Fordham, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Ms. Harriet Eudy  
ALLTEL  
206 White Avenue, S.E.  
Live Oak, FL 32060-3357

Ms. Rhonda P. Merritt  
AT&T  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549

Michael A. Gross  
Florida Cable Telecommunications Assoc., Inc.  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Scott Sapperstein, Esq.  
Intermedia Communications, Inc.  
One Intermedia Way, M.C. FLT-HQ3  
Tampa, FL 33647-1752

Ms. Donna C. McNulty  
WorldCom, Inc.  
325 John Knox Road, Suite 105  
Tallahassee, FL 32303-4131

NANPA  
Tom Foley, Relief Planner  
Eastern Region  
820 Riverbend Blvd.  
Longwood, FL 32779

Mr. F. B. (Ben) Poag  
Sprint-Florida, Incorporated  
P. O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214

Ms. Carolyn Marek  
Time Warner Telecom  
233 Bramerton Court  
Franklin, TN 37069-4002

Ms. Michelle A. Robinson  
c/o Mr. David Christian  
Verizon Florida Inc.  
106 East College Avenue, Suite 810  
Tallahassee, FL 32301-7704

Peter M. Dunbar  
Karen M. Camechis  
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302

Charles Beck, Esq.  
Office of Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

Ms. Dana Shaffer  
XO Communications, Inc.  
105 Molloy Street, Suite 300  
Nashville, TN 37201

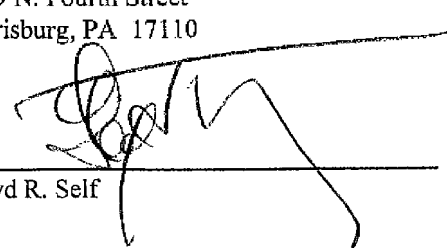
Vicki Gordon Kaufman, Esq.  
McWhirter, Reeves, McGlothlin, Davidson, Decker,  
Kaufman, Arnold & Steen, P.A.  
117 S. Gadsden Street  
Tallahassee, FL 32301

Kimberly Wheeler  
Morrison & Foerster  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006-1888

Vicki Gordon Kaufman  
McWhirter Reeves  
117 South Calhoun Street  
Tallahassee, Florida 32301

Ms. Dana Shaffer  
XO Communications  
105 Molloy Street, Suite 300  
Nashville, TN 37201-2315

Ms. Amy Putnam  
Neustar, Inc.  
3519 N. Fourth Street  
Harrisburg, PA 17110

  
\_\_\_\_\_  
Floyd R. Self