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March 8, 2002

Ms. Blanca Bayó, Director
Division of the Commission Clerk and
Administrative Services
Easley Building, Room 110
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Docket No. 010963-TP Investigation into Telecommunications Rate
Center Consolidation in the State of Florida

Dear Ms. Bayó:

AT&T Wireless will not be attending the workshop because most of the matters on the agenda are more pertinent in the wireline context. AT&T Wireless, however, submits these comments in response to the Workshop Notice in the above referenced docket.

AT&T Wireless strongly supports rate center consolidation ("RCC") as a means of using existing numbering resources more efficiently. RCC can extend the life of an existing area code, provided that a shortage situation has not already been reached, by reducing the demand for new numbers. Furthermore, RCC does not require any additional authority from the Federal Communications Commission ("FCC") from a number utilization standpoint. In fact, the FCC "strongly encourage[s] the state regulatory commissions to proceed as expeditiously as possible to consolidate rate centers."¹

¹ *Numbering Resource Optimization*, Petition of the Arizona Corporation Commission for Delegated Authority, NSD File L-99-100, Petition of the Colorado Public Utilities Commission for Additional Delegated Authority, NSD File L-00-16, Petition of the Georgia Public Service Commission for Additional Delegated Authority, NSD File L-99-98, Indiana Regulatory Commission Petition for Additional Delegated Authority, NSD File No. L-99-82, Iowa Utilities Board Petition for Delegation of Additional Authority and Request for Limited Waiver, NSD File No. L-99-96, Public Service Commission of Kentucky's Petition for Additional Delegated Authority, NSD File No. L-00-08, Missouri Public Service Commission Petition for Additional Delegated Authority, NSD File No. L-99-90, Nebraska Public Service Commission Petition for Delegation of Additional Authority, NSD File No. L-99-83, North Carolina Utilities Commission Petition for Additional Delegated Authority, NSD File No. L-99-97, Petition of the Oregon Public Utility Commission for Expedited Decision, NSD File No. L-00-29, Petition of the Pennsylvania Public Utility Commission for Delegated Authority, NSD File No. L-99-101, Petition of the Tennessee Regulatory

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In addition, RCC provides even greater number resource optimization benefits in a pooling environment. For example, in the pre-pooling environment if a competitive local exchange carrier (CLEC) wanted to provide service in a geographic area that covered thirty (30) rate centers it would have to obtain 30 blocks of 10,000 numbers or 300,000 numbers to begin serving customers. By consolidating rate centers by one-third or from 30 to 10, the CLEC would only have to obtain 100,000 numbers to serve the same customers. Number utilization measures are further enhanced in areas where there is both rate center consolidation and pooling. In the example above, if the same geographic area originally served by 30 rate centers was consolidated to 10 rate centers and the area also participates in pooling, the CLEC would only need to obtain 10,000. This is a savings of 290,000 numbers to serve the same geographic area.

Since wireless carriers do not need to obtain numbers from every rate center to serve a specific geographic area, RCC would not result in much of a change to wireless carriers' number utilization. Wireless carriers today are not dependent on traditional incumbent local exchange carrier ("ILEC") rate centers for their mobile originated calls. In fact, wireless carriers' local calling areas in most instances are significantly larger than ILEC local calling areas. This does not mean, however, that wireless carriers are not dependent on the ILEC rate centers in several important respects. Perhaps most significantly, the rate center with which a wireless carriers associates its NPA/NXX determines the rating of the call from all landline phones. Wireless carriers, therefore, must take numbers out of a sufficient number of rate centers to provide service; however, this will not be affected by RCC.

AT&T Wireless appreciates the opportunity to provide comments in support of rate center consolidation in Florida.

Sincerely,



Floyd R. Self

FRS/amb

Cc: Parties of Record

Authority for Additional Delegated Authority, NSD File No. L-99-94, Petition of the Utah Public Service Commission for Accelerated Grant of Authority, NSD File No. L-99-89, Petition of the Virginia State Corporation Commission for Expedited Decision on Delegation of Authority, NSD File No. L-99-95, Washington Utilities and Transportation Commission's Amended Petition for Additional Delegated Authority, NSD File No. L-99-102, *Order*, CC Docket No. 96-98, 99-200, DA00-1616 (Re. July 20, 2000) (*July Order*), para. 59.