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March 11, 2002

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Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Gerald L. Gunter Building
2540 Shumard Oak Boulevard, Room 110
Tallahassee, Florida 32399-0850

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

Dear Ms. Bayo:

Enclosed for filing on behalf of VoiceStream Wireless Corporation ("VoiceStream") are an original and fifteen copies of a letter that sets forth VoiceStream's position regarding rate center consolidation as solicited in the Florida Public Service Commission's ("Commission") Notice of Commission Workshop in the above-referenced docket.

Please acknowledge receipt of these documents by date stamping the enclosed copy of this letter and returning it to the undersigned.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell

AUS _____
CAF _____
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COM _____
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ECR MPM/rl
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Re: Docket No. 010963-TP, Investigation into Telecommunications Rate Center Consolidation in the State of Florida

Dear Ms. Bayo:

Pursuant to the Florida Public Service Commission's February 18, 2002, "Notice of Commission Workshop" in the above-referenced proceeding, VoiceStream Wireless Corporation ("VoiceStream") hereby respectfully submits this letter in lieu of comments. In the Notice, the Florida Public Service Commission ("Commission") solicited participation in the Commission workshop scheduled for March 15, 2002, and/or comments from the telecommunications industry regarding the impact and implementation of possible rate center consolidation to better utilize telephone numbers in the state of Florida.

VoiceStream applauds the Commission's long-standing commitment to optimizing the state's number resources through the employment of various techniques authorized by the Federal Communications Commission ("FCC"). In addition, we commend the Commission's diligent and on-going efforts to take the steps necessary to provide timely area code relief. The Commission's tireless commitment to responsibly meeting the state's numbering needs has enabled fast-growing wireless carriers such as VoiceStream to maintain access to sufficient resources. By its responsible actions, Florida's consumers have greatly benefited from the thriving and competitive market for wireless services in the state. VoiceStream appreciates and anticipates that the Commission will maintain a continuing leadership role in implementing authorized and responsible number conservation techniques. Accordingly, VoiceStream welcomes the Commission's in-depth consideration of important number conservation techniques, like rate center consolidation, that can have significant long-term benefits for telephone users in Florida.

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VoiceStream supports the Commission's broad consideration of rate center consolidation as an attractive number resource optimization measure for the State of Florida

VoiceStream supports the Commission's above-referenced docket proceeding that seeks to further explore rate center consolidation as a method of optimizing numbering resources in the State of Florida. Rate center consolidation has been previously employed by this Commission with much success in two contrasting areas of Florida – the relatively sparsely populated Florida Keys (Monroe County) and the much more heavily populated Tampa Bay area. Both areas realized some, if not all, of the following conservation benefits of rate center consolidation: (a) salvaging stranded NXXs within existing Florida NPAs, thereby extending the life of that NPA; (b) maximizing the benefits of previously ordered conservation measures in the state; and (c) contributing to extending the life of the North American Numbering Plan (“NANP”), as a whole, thereby benefiting consumers and industry nationwide. These important gains should serve as an important reference point for the Commission as it seeks to advance the discussion of this broader docket and rate center consolidation within the Florida telecommunications industry.

The employment of broad rate center consolidation must be considered and evaluated on an NPA by NPA basis. In order to realize a net number conservation effect for the entire state of Florida, the Commission will need to remain mindful of both the substantiated advantages and disadvantages of rate center consolidation on the Florida telecommunications industry as well as the detailed impacts on consumers and competition in each NPA. It is VoiceStream's intent to address several discussion items on the Commission's Agenda via this letter and to work collectively with the entire industry, consumers and the Commission staff toward a thorough and well-reasoned recommendation on how to advance this proven number conservation measure.

The FCC has strongly encouraged rate center consolidation in certain areas throughout the country

Since 2000, the FCC has "strongly encouraged" state commissions to proceed expeditiously with consolidation of rate centers.¹ While conditionally granting 25 states delegated authority to implement various conservation measures, the FCC in the *Second Report and Order* stated:

¹ *Numbering Resource Optimization*, Second Report and Order and Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 00-429, ¶ 7. (2000) (*Second Report and Order*).

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Although we did not mandate rate center consolidation in the First Report and Order, we also believe that rate center consolidation is an attractive numbering resource optimization measure because it enables carriers to use fewer NXX codes and blocks to provide service throughout a region, thereby reducing the demand for NXX codes and thousand blocks, improving number utilization, and prolonging the life of an area code.²

Simply stated, consolidation of rate centers in a given NPA consolidates resources into a larger “pool” for allocation across a larger geographic area.³ States were specifically encouraged by the FCC to explore this opportunity in “areas where contiguous calling areas have identical or substantially similar rating schemes.”⁴ The FCC further stated that employing this state-based number conservation tool in this manner “is least likely to have a significant impact on carrier revenues, because minimal realignment of local, extended, and toll call calling boundaries would be necessary.”⁵ The FCC generally concluded that rate center consolidation is best implemented in the nation’s one hundred largest MSAs and in metropolitan regions – areas which tend to have a larger number of competitive local exchange carriers and, hence, a higher demand for numbering resources.⁶

Advantages and Disadvantages have been documented by this Commission, the FCC and numerous other state Commissions

Various states, with varying goals, including Florida, Texas, Colorado, New Jersey, and Minnesota, have completed significant rate center consolidation studies. For some states, the benefits outweighed the costs and resulted in implementation of this technique; other states have decided to refrain for the present time from such implementation.

The general attributes of rate center consolidation are that it enables most carriers to

² Id.

³ See generally *In the Matter of Numbering Resource Optimization*, Notice of Proposed Rulemaking, in CC Docket No. 99-200, FCC 99-122, ¶ 113. (1999) (*NRO Proposed Rulemaking*).

⁴ *Second Report and Order*, at ¶ 147.

⁵ Id.

⁶ *Second Report and Order*, at ¶ 148.

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maintain their existing call-routing and call-rating methods, is competitively neutral, and unlike thousand number block pooling, does not require that Local Number Portability architecture be in place, and does not preclude the adoption of other number resource optimization methods.⁷ Adding to its benefits is its ease of implementation. Rate center consolidation: (1) may be flexibly implemented on a state, NPA or multiple rate center basis and (2) may be implemented in a short timeframe.⁸

Several state commissions have focused on the perceived disruptive impacts of rate center consolidation on carriers and consumers. These include: (1) reduction in local exchange carrier revenues; (2) corresponding increases in customers' local service rates; (3) consumer confusion regarding changes in their local calling area; and (4) complex consolidation schemes involving expensive modifications to carriers' switches and operations support systems. Several states have, unwisely, chosen to focus on the unsubstantiated and incorrect presumption that rate center consolidation is not feasible because the integrity of 911 and E911 systems would be compromised. Fortunately, experience where rate center consolidation has been implemented amply demonstrates that 911 and E911 issues can be fully and successfully resolved enabling rate center consolidation to move forward.

VoiceStream recommends proceeding with rate center consolidation as a worthwhile number conservation tool

Based on the foregoing discussion, VoiceStream recommends that the Commission give full consideration to rate center consolidation in each Florida NPA on a case-by-case basis. The Commission should focus such examination on: (1) areas or NPAs in the State of Florida where contiguous calling areas have identical or substantially similar rating schemes; (2) Florida regions which fall within the nation's one hundred largest MSAs; and (3) Florida metropolitan regions which tend to have a larger number of competing local exchange carriers and thus a higher demand for number resources. In the state of Florida, where one thousand number block pooling is already underway, rate center consolidation presents the further benefit of having a larger geographic area from which to do pooling. The methodical approach recommended here will ensure that any disruptive impacts on carriers and consumers are minimized to the greatest extent possible; while providing the most opportunity for number resource optimization to be realized.

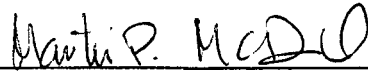
⁷ *NRO Proposed Rulemaking*, at ¶ 114.

⁸ *Id.*

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In conclusion, VoiceStream is eager to work with this Commission, the Florida telecommunications industry and Florida's consumers to undertake a thorough evaluation of this important and worthwhile optimization measure.

Respectfully submitted,



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March 11, 2002

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a copy of the foregoing was furnished by U.S. Mail to the following this 11th day of March, 2002:

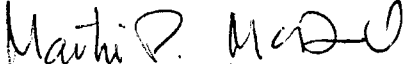
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