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May 10, 2002

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COMMISSION
CLERK

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 010963-TP

Dear Ms. Bayó:

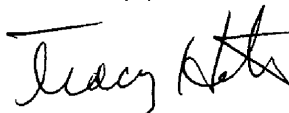
Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are the following documents:

1. An original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Petition to Intervene; and **05091-02**
2. An original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Comments. **05092-02**

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,




Tracy W. Hatch

AUS _____
CAF _____
CMP Fordham
COM _____
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ECR _____
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SEC _____ Enclosures
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cc: Nanette Edwards, Esq.

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FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Telecommunications)
Rate Center Consolidation in the State of)
Florida)
_____)

Docket No. 010963-TP
Filed: May 10, 2002

**ITC^DELTA COM COMMUNICATIONS, INC.'S
COMMENTS**

ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom (“ITC^DeltaCom”), hereby files its Comments regarding Rate Center Consolidation (“RCC”) in the above-referenced docket.

Introduction

During the rate center consolidation workshop in mid-march 2002, Commissioner Jaber requested comments with respect to rate center consolidation. Chairman Jaber also questioned why CLECs were not present at the meeting. Unfortunately due to the size of our company and the resources available to us, ITC^DeltaCom cannot attend all the meetings that it would like to with respect to telecommunication proceedings. Please consider the following comments as ITC^DeltaCom's position regarding RCC for the State of Florida.

Summary

ITC^DeltaCom is a CLEC and an IXC servicing customers in Florida. ITC^DeltaCom operates as a CLEC primarily in BellSouth and Sprint territory. ITC^DeltaCom generally supports Rate Center Consolidation as a way to simplify the number of rate centers telecommunication providers have to deal with in the marketplace. ITC^DeltaCom submits that RCC will open new opportunities for competition with Florida customers.

For example, ITC^DeltaCom has a Key West rate center code. With RCC of the Florida Keys to one rate center, ITC^DeltaCom is able to offer this code source and our services to a larger area. In many cases over the past five years throughout the BellSouth region, ITC^DeltaCom has had to secure code resources for every rate center in our marketing plan. Recently ITC^DeltaCom had to ask for five (5) more NXX codes to fill in gaps of our coverage area in South Florida. ITC^DeltaCom respectfully submits that code resources would be better used and extend the life of NPAs if selective RCC did take place.

With respect to the issue of loss of toll revenue which was raised by one of the Incumbent Local Exchange Carriers (“ILECs”) during the workshop, ITC^DeltaCom does not see this as a factor in our business model. ITC^DeltaCom already has an agreement with BellSouth that the local calling area encompasses the LATA and would prefer to have the same or similar arrangement with Verizon and Sprint. Thus, the reason toll revenue is not a factor is because ITC^DeltaCom generally offers a larger calling area for our customers. Furthermore, in those states where RCC has been implemented, ITC^DeltaCom has experienced minimal impact on its toll revenues or access billings. For example, in Atlanta, Georgia, ITC^DeltaCom was able to return large groups of thousands blocks to the pooled code resources and reduce the complexity of twenty-three rate centers down to three rate centers. As a result of RCC, the Georgia Public Service Commission recently placed a hold on establishing a new area code due to the combination of RCC and number pooling. Additionally, ITC^DeltaCom submits that most access revenue comes from Feature Group D access trunking which is minimally impacted by RCC.

During the workshop, the issue of whether CLECs have had difficulty with obtaining codes was raised. ITC^DeltaCom has had minor problems with securing code resources due to

code jeopardies and NPA splits. In each case, ITC^DeltaCom was able to adjust its plans around these issues. However, ITC^DeltaCom believes that RCC would make more code resources available for growth as well as allow new telecommunication entrants the opportunity to enter the marketplace.

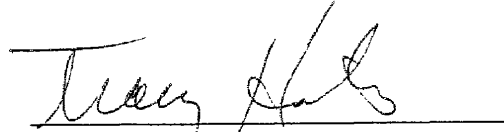
While not directly related to RCC, the introduction of number pooling has placed the competitive provider at a disadvantage if that competitive provider has few code resources and is faced with a business opportunity that requires large blocks of numbers (1,000+). In those instances, the ILECs have the advantage. However with RCC, there would be more number resources available to take care of these demands in the near-term, and would make code resources more efficient in the long-term.

Where would RCC be most effective? ITC^DeltaCom submits that rate center consolidation would be most beneficial in the South Florida and Tampa area. Specifically, there are nine rate centers between Miami and West Palm. ITC^DeltaCom believes that there is room to consolidate these nine centers into the Miami or West Palm centers with minimal impact to the industry. Similarly, the Tampa area also lends itself to rate center consolidation. On the other hand, smaller consolidation potential exists for multiple rate centers in the same county that are served by different switches and have similar calling areas.

Conclusion

To conclude ITC^DeltaCom is in favor of RCC as a way to manage code resources and assist new entrants into the market place. Further, the costs of implementing RCC, within ITC^DeltaCom, are negligible and manageable to the time frame specified by the Commission and/or the ILEC.

Respectfully submitted this 10th day of May, 2002.

A handwritten signature in black ink, appearing to read "Tracy Hatch", is written over a horizontal line.

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Attorney for ITC^DeltaCom. Communications, Inc.


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of ITC DeltaCom Communications, Inc.'s Comments in Docket 010963-TP has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 10th day of May, 2002.

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