



David Christian
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October 14, 2005

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Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Ms. Bayo:

**Subject: Docket No. 050421-TL
Verizon Florida's Post Workshop Comments**

Enclosed for filing is Verizon Florida Inc.'s Post Workshop Comments in Docket No. 050421-TL.

If you have any questions or require additional information, please Debby Kampert of my staff at 813-483-2531.

Sincerely,

s/ David M. Christian

David M. Christian

DC:dbk

Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Alliance of Information)
And Referral Services to initiate rulemaking to)
require local exchange telecommunications)
companies to include 211 information on inside)
cover of telephone directories)

Docket No. 050421-TL
Filed: October 14, 2005

VERIZON FLORIDA'S POST WORKSHOP COMMENTS

Verizon believes 211 is a beneficial community resource and has completed the necessary network modifications to provision the service. While under no obligation to do so, Verizon is willing to work directly with the Florida Alliance of Information and Referral Services (FLAIRS) regarding community awareness and the options available.

Currently, in areas where 211 service is available, Verizon includes information regarding 211 within the customer information pages of its telephone directories. Verizon has no record that FLAIRS, or any of the agencies providing 211 services, requested that Verizon print the information elsewhere or in a different format, or that FLAIRS otherwise contacted Verizon prior to filing its petition.

Nevertheless, to respond to the concerns identified in the FLAIRS petition, Verizon will, on a voluntary basis, include "211" and a brief description of "211" under the "Other Important Numbers" printed on the inside front cover or the first page of the directory, effective with its 2006 publications.

However, although Verizon is willing to undertake this step on a voluntary basis, it is not necessary or appropriate for the Commission to adopt a new rule regarding this matter. Instead, Verizon suggests that FLAIRS, or the agencies providing 211, contact the local exchange companies (LECs) to discuss the options available for raising public awareness of the availability of 211, which may vary by company. Indeed, there are other ways of promoting 211 awareness than imposing a blanket obligation on telephone companies to list 211 on the inside front cover along with emergency

telephone numbers such as 911 and poison control. Although FLAIRS compares 211 to 911, the two services are not the same. Moreover, printing 911 on the inside cover of telephone directories has not been the only or primary method of consumer education about the availability of 911 over the past decade. Instead, the counties have undertaken their own awareness and education efforts. Therefore, instead of seeking a rulemaking, FLAIRS should explore alternative means of publicizing 211 services, such as working with the Commission's Bureau of Consumer Outreach, which publishes numerous brochures and bulletins that are distributed to the public and are available on the Commission's website.

Indeed, there is no statutory requirement for LECs to print 211 information on the inside front cover of their directories, and thus Verizon does not believe the Commission has the statutory authority to adopt such a requirement in a rule. Neither the Federal Communication Commission's (FCC) Third Report and Order and Order on Reconsideration concerning N11 services nor the Florida 211 statute imposes an obligation on LECs to advertise or promote 211 services on behalf of the agencies that provide them.

Nor should this Commission impose a requirement uniquely on LECs to provide advertising for 211 in their directories. Directory publishing is a competitive business, and not all telephone directories are affiliated with a LEC or are otherwise regulated by the Commission. Competitive directory services providers will not be required to comply with a Commission rule.

In summary, it is not necessary or appropriate to adopt a rule requiring LECs to include 211 information on the inside cover of the telephone directories. Instead, FLAIRS should contact LECs directly to discuss the options available for increasing customer awareness of 211 without imposing a one-size-fits-all approach.

Respectfully submitted on October 14, 2005.

By: s/ David M. Christian

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