May 28, 1999

Sent VIA Federal Express

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Magalie Roman Salas, Secretary
Federal Communications Commission
Portals II, 445-12th Street SW
Suite TW-A325
Washington DC 20554

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MAY 28 1999
FCC MAIL ROOM

RE: NSD-L-99-33, DA 99-725, CC Docket 96-98
In the Matter of the Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures

Dear Ms. Salas,

Enclosed for filing in the above matter please find one original and six copies of the Massachusettes Dept. of Telecommunications and Energy's Comments in Support of the Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures. Kindly stamp one copy and return it to us in the enclosed stamped, self-addressed Federal Express envelope.

Sincerely,

Peggy Arvanitas
% RE/MAX First Class
620 Bypass Drive
Clearwater, Fla. 33764
(727)-797-7500

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FCC

RE: NSD-L-99-33, DA 99-725, CC Docket 96-98

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FROM:
Peggy Arvanitas
% RE/MAX First Class
620-Bypass Drive
Clearwater, Fla. 33764
(727)-797-7500-work

RECEIVED May 27, 1999
MAY 28 1999
FCC MAIL ROOM

This is a notice affirming the Florida Public Service Commission's proposal to ask for conservation measures, specifically consequitive numeration. Not being an attorney, but being a realtor, I am expressing my bias for the people. But having family members in the cable and telecommunication industry, I have a more advanced knowledge than the "layman - Florida citizen" and would like to make a few points.

The utilization studies the Florida PSC asked for in the last 2 years are informative - however, for land based carriers - such as GTE, these numbers might be inflated. For example, GTE has 10,000 numbers in an NXX. It assigns 6,000 numbers to individuals. 2000 numbers later are "downgraded," or disconnected. You and I would think GTE has 4,000 live or operational numbers. However, utilization studies would show 6000 numbers! Lines are turned off in

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the field, but left on at the switch. A "disconnected" number still has a dial tone. You try to dial, and a recording comes on, and directs you to a message about new service. Utilization studies are a measurement, but by no means accurate. Our interpretation of "live" numbers would be different from GTE's, or a land based company.

Consequitive numeration will be vehemently argued against by the industry (i.e. telecommunications) for big business. The reason you have "contaminated" 1000 number pools is because numbers making words: "HOT-MAMA" (468-6262), are vanity numbers big business like and pay more for. So, the "cream" is taken out of the "oreo cookie". Would you want "contaminated qualified 1000's numbers" if they were thrown back in in a numbering pool? Also, many numbers are "reserved" for big business set-aside for future usage. We have to review how "big business" asks for numbers, and weigh that out for the little people.

The greatest concern I see, as what is occuring in Florida, is that

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not all the players are participatory in the confirmation or review process. NANPA does not have the enforcement ~~pro~~ capabilities that individual Public Service Commissions would have. The telecommunications industry, in one breath, cannot fight FCC for setting federally — rates, wanting state by state review, then try to exclude themselves from state to state control. The NANCode says that the numbers are the <u>public's</u> numbers. Let's not forget that.

In closing, let me re-iterate that I feel like David against Goliath. I am a lowly realtor. Making money with the phone & communicating with people is my life. And my customers, who are customers for life, expect me to have answers I do not have. I do see consequitive numeration as a better measurement <u>of</u> <u>and</u> for usage than anything presently open for our review.

Thank-you.

Peggy Arvanitas

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