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RECEIVED

AUG 25 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 25, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, DC 20554

Re: CC Docket No. 99-200

Dear Ms. Salas:

On August 24, 2000, I, representing BellSouth, met with Diane Griffin Harmon, Marilyn Jones, Cheryl Callahan, Helene Nankin, Sanford Williams, and Aaron Goldberger of the Common Carrier Bureau's Network Services Division. Bill Shaughnessy, Bill Pelych, and Karen Holmes, also representing BellSouth, Jim Pennington of Lodkheed-Martin Corporation, Bud Moore and Carolyn Mason, representing the Florida State Office of Technology, and Bob Zelazny of the Palm Beach County Government also participated in this meeting by telephone. The purpose of the meeting was to discuss the impact upon the BellSouth customers listed above of the Commission's recently adopted rule that would limit to 45 days the period in which a number could be held for a customer in reservation status.

Mr. Moore and Ms. Mason explained that their office oversaw the operation of the statewide telecommunications system, a Centrex system with approximately 175000 lines, 47000 of which were in Tallahassee, the Florida state capital. That system serves state, county and school districts throughout Florida. Mr. Moore explained the importance of contiguous blocks of telephone numbers to the administration and operation of the state system. He noted that because the system currently supports the more efficient 5-digit campus dialing and 7-digit long distance, the NXX codes that the state system can use are limited. He also noted that facsimile service and remote access service upon which Florida state

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government agencies rely increasingly to serve the public also require contiguous numbers. The 45-day rule would place in jeopardy the system's ability to support these services and its efficient dialing system because the dynamic growth of government meant frequent recycling of telephone numbers. Mr. Moore then explained that his office practiced good stewardship of the numbers assigned to the state system and worked hard to maintain a high utilization rate and to reuse numbers after a 9-month aging period. Mr. Moore also noted the 45-day reservation rule could result in residential or business customers being significantly inconvenienced. He noted that if a number previously used by a state agency, but inactive for more than 45-days, were then assigned to a residential or business customer, that customer would likely receive many calls intended for that state agency.

Mr. Zelazny, noting that Palm Beach County government owned 160 PBX's, echoed the state representatives' concern that without assurance of contiguous number block assignments the efficiency of the county telecommunications system would be at risk. Palm Beach County too has 5-digit dialing within its system, which would be placed at risk if numbers temporarily unused had to be returned to the available number pool after 45-days with the likelihood of subsequent assignment to non-county government lines. He added that the county too practiced good numbering stewardship and was, in fact, preparing to release 6200 of the number assigned to it. Mr. Zelazny also noted the hardship the 45-day rule would impose when numbers had been assigned for lines in buildings under construction.

Mr. Pennington stated that under the 45-day rule, Lockheed-Martin would face the issues that the government representatives had identified, but would also face security and public relations issues. Mr. Pennington noted that Lockheed-Martin had approximately 20 move or change orders daily and that the company's telecommunications needs were very dynamic, expanding and contracting so that at any given time between 8000 and 13000 number in its Marietta multi-campus Centrex system would be active. As a company with many military and international contracts, Lockheed-Martin must be able to monitor and to do sweeps of the lines assigned to it and to be sure that data transmitted to and from them could be held secure. Mr. Pennington explained that the company's director of security expected the probability of proprietary data being misrouted would increase significantly if Lockheed-Martin could no longer be assured of contiguous number block assignments. Like the other customers in this meeting, Mr. Pennington stated that his company worked hard to recycle numbers and to return temporarily disconnected numbers to service quickly.

As required by Section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The signature is written in a cursive style with a large initial 'K'.

Kathleen B. Levitz

cc: Diane Griffin Harmon
Marilyn Jones
Cheryl Callahan
Helene Nankin
Sanford Williams
Aaron Goldberger