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PUBLIC SERVICE COMMISSION

January 8, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW - TW-A325
Washington, DC 20554

Re: **Florida Public Service Commission Petition for Expedited Decision for the Release of a New Area Code to Provide Relief for the 561 Numbering Plan Area; CC Docket No. 96-98**

Dear Ms. Salas:

Forwarded herewith is the Florida Public Service Commission Petition for Expedited Decision for the Release of a New Area Code to Provide Relief for the 561 Numbering Plan Area.

The Florida Public Service Commission primary contact for this matter is Tim Vaccaro. He can be reached at (850) 413-6181.

Sincerely,

/s/

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Florida Public Service Commission Petition for Expedited Decision for the Release of a New Area Code to Provide Relief for the 561 Numbering Plan Area	)	

FLORIDA PUBLIC SERVICE COMMISSION
PETITION FOR EXPEDITED DECISION
FOR THE RELEASE OF A NEW AREA CODE
TO PROVIDE RELIEF FOR THE 561 NUMBERING PLAN AREA

The Florida Public Service Commission (FPSC) hereby requests the Federal Communications Commission (FCC) to direct the North American Numbering Plan Administrator (NANPA or NeuStar) to release a new area code to provide relief for the 561 numbering plan area (NPA). On October 20, 2000, the FPSC in consolidated Dockets Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL, issued Order No. PSC-00-1937-PAA-TL, Final Order Approving Number Plan Relief for the 305/786 Area Code, the 561 Area Code, the 954 Area Code, and the 904 Area Code, Requiring Customer Survey for a Number Change, and Notice of Proposed Agency Action Order Implementing Rate Center

Consolidation and Code Sharing in Certain Areas and Requiring Customer Survey for Cost Sharing. By that Order, the FPSC, in part, approved an area code relief plan for the 561 NPA, resulting in a geographic split. Pursuant to delegated authority under FCC Order 99-249, the FPSC also ordered the implementation of thousand-block number pooling for the Fort Pierce-Port St. Lucie metropolitan statistical area (MSA) in the 561 NPA, which extended 561 pooling trials approved by Order No. PSC-00-1046-PAA-TL, Notice of Proposed Agency Action Order Approving Offer of Settlement and Final Order Dismissing Protest and Making Final the Unprotested Portions of Order No. PSC-00-0543-PAA-TP, issued April 2, 2000, in Docket No. 981444-TP.

On November 13, 2000, consistent with the FPSC's Order, the Florida telecommunications industry, through the NANPA NPA Relief Planner, submitted to NeuStar an application for a relief NPA code for the 561 NPA. By letter dated November 28, 2000, NeuStar denied the request, based on its conclusion that the plan set forth in the FPSC's Order was inconsistent with NPA Assignment Guidelines.

The FPSC asks the FCC to support its delegated authority to approve numbering relief by granting the petition. The facts substantiating the FPSC's request are as follow:

(1) Pursuant to its delegated authority under 47 C.F.R. §§ 52.3 and .19, the FPSC initiated Docket No. 990456-TL to address relief for the 561 NPA. The PSC conducted two service hearings in the affected area and a technical hearing, in which it heard testimony from affected citizens, elected officials, industry and a representative of NeuStar. The FPSC held a Special Agenda Conference on September 29, 2000 to consider FPSC staff's recommendation on numbering relief. During the Special Agenda Conference, the FPSC also entertained additional comments from county and state officials.

(2) By Order No. PSC-00-1937-PAA-TL, issued October 20, 2000, the FPSC, in part, approved a relief plan for the 561 NPA which consists of a geographic split, creating two regions. The approximate exhaust periods were determined to be 24.6 years for Region A, and 3.1 years for Region B. The FPSC noted in its Order that these exhaust periods were contrary to Industry Numbering Committee (INC) Guidelines. Id. at 28-29. The FPSC also noted, however, that NeuStar's witness testified that the exhaust projections may not be accurate. Id. at 28. The witness indicated on the record that the projection forecasting tools were subject to error. PSC Staff Recommendation in consolidated Dockets Nos.

990455-TL, 990456-TL, 990457-TL and 990517-TL (September 15, 2000) at 26. During the Special Agenda Conference, one FPSC Commissioner also noted that the FPSC's implementation of thousand-block pooling might extend the exhaust periods beyond those forecasted for the approved plan.

(3) On November 13, 2000, consistent with the FPSC's Order, the Florida telecommunications industry, through the NANPA NPA Relief Planner, submitted to NeuStar an application for a relief NPA code for the 561 NPA. NeuStar denied the request. NeuStar stated that NPA Assignment Guidelines require that relief options cover a period of at least five years beyond the projected date of exhaust, and that the difference in NPA lifetimes of more than 15 years must be avoided.

(4) The FPSC's area code order pertaining to the relief of the 561 area code, however, is based on evidence received through customer service hearings, interrogatories to the industry, testimony provided by elected officials, industry members and by a representative of NeuStar. The FPSC determined that a geographic split provides the most appropriate relief for the 561 area code. The FPSC was particularly persuaded by the extensive customer

testimony in favor of a geographic split, even with the knowledge of the possible exhaust dates.

(5) The FCC has authorized state commissions to resolve the implementation of new area codes, subject to the FCC's rules governing the administration of telephone numbers, recognizing that "[s]tate commissions are uniquely positioned to understand local conditions and what effect new area codes will have on those conditions."[1] Unfortunately, the industry guidelines do not take into account customer input nor do they allow state commissions the flexibility to consider matters beyond those guidelines. On December 3, 1999, by Delegated Authority (DA) 99-2696, the FCC Common Carrier Bureau approved a similar request for relief filed by the State of New York Department of Public Service (NYDPS). The Common Carrier Bureau's decision was based, in part, on its conclusion that the NYDPS "area code relief plan was developed based on extensive input from industry and from consumers affected by the decision, which balanced a number of public interest goals."

[1] FCC 96-333, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers; Area Code Relief Plan for Dallas and Houston, Ordered by the Public Utility Commission of Texas; Administration of the North American Numbering Plan; Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, CC Docket No. 96-98, et al., Second Report and Order and Memorandum Opinion and Order, (August 8, 1996), paragraph 272.

DA 99-2696 letter. Further, the FCC has indicated that it continues "to believe that state commissions are uniquely positioned to determine when, and in what form, to implement area code relief."[2] In fact the FCC has stated that it "must rely on state commissions to make area code relief decisions because of their unique position to ascertain and weigh the very local and granular information inherent in area code relief decision making."[3] As such, the FPSC believes that the FCC should give greater weight to the FPSC's evidentiary process in determining area code relief. Further, the FPSC's implementation of thousand-block pooling may extend the exhaust dates in the approved plan. Therefore, the FPSC requests that the FCC support its delegated authority to approve numbering relief and direct NANPA to release a new area code to

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[2] FCC 00-429, In the Matter of Numbering Resource Optimization Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, CC Dockets Nos. 96-98 and 99-200, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, (December 29, 2000), paragraph 57.

[3] Id., paragraph 59.

provide relief for the 561 NPA as provided for by Order No. PSC-00-1937-PAA-TL.

(6) Expedited treatment of this petition is necessary in order to provide assurance to consumers that this important matter is being addressed in a timely manner.

Conclusion

In conclusion, the FPSC hereby requests the FCC to issue an expedited decision directing NANPA to release a new area code to provide relief for the 561 numbering plan area as provided for by Order No. PSC-00-1937-PAA-TL.

Respectfully submitted,

/ s /

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DATED: January 8, 2001

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida Public Service Commission will be furnished to the parties on the attached service list.

/s/

Cynthia B. Miller, Esq.
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