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BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

JUL - 3 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

July 2, 2001

EX PARTE OR LATE FILED

EX PARTE

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 July 2, 2001, Bill Shaughnessy and I, representing BellSouth, met with Diane Griffin Harmon, Sanford Williams, Jennifer Gorny, and Gina Dennis of the Common Carrier Bureau's Network Services Division and Margaret Dailey of the Bureau's Competitive Pricing Division. Participating in the meeting by telephone were: Al Bolden; Mel Clay; and John Patterson, all representing BellSouth. The purpose of our meeting was to discuss BellSouth's study of the costs it has and will continue to incur to implement thousand-block number pooling throughout its region and the need for the Commission to address how carriers like BellSouth are to recover those costs. BellSouth filed that cost study with you in a written *ex parte* in CC Docket No. 99-200 dated June 20, 2001. The cost study and the attached document formed the basis for our presentation.

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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 cursive script that reads "Kathleen B. Levitz". The signature is written in black ink and is positioned above the typed name.

Kathleen B. Levitz

Attachment

cc: Diane Griffin Harmon (w/o attachment)
Sanford Williams (w/o attachment)
Jennifer Gorny (w/o attachment)
Gina Dennis (w/o attachment)
Margaret Dailey (w/o attachment)

Number Pooling Cost Recovery

*BellSouth Corporation
CC Docket 99-200
July 2, 2001*

Number Pooling Costs

- **Number pooling costs are incremental to number portability costs.**
- **Carrier specific costs fall into one of the following categories:**
 - Network capital & expense
 - Operational support systems (OSS) capital and expenses
 - Employee related and other expenses
- **Significant network and system changes needed to implement number pooling. For example,**
 - Every OSS that relies on the NXX portion of the 10-Digit North American Numbering Plan (NANP) telephone number as a primary data source must be changed.
 - SCP upgrades are needed in order to implement number pooling.
 - Feature upgrades to switches are needed to implement number pooling.
 - New processes/procedures are needed to address allocation of 1k blocks.
- **BellSouth utilized the same “but for” criteria as specified in the number portability proceedings.**

Number Pooling Cost Study

- **Major Assumptions:**
 - Number pooling implementation will be based on top 100 MSAs plus current pooling trials in BST region.
 - Pooling will be implemented in 3 NPAs per quarter within BellSouth region
 - Cost for Years 2000 to 2006
 - TSLRIC with Shared and Common Cost
 - 11.25% Cost of Money
- **As requested, cost study assumes cost savings from deferral of NPA relief.**
 - Number pooling does not eliminate the need for NPA relief.
 - Study assumes that number pooling implementation defers NPA relief for three years.
- **Bellsouth's carrier specific costs for number pooling are approximately \$121M.**
- **Study does not include Type 1 costs that may be allocated to BellSouth.**

Number Pooling Cost Recovery

- **Type I and Type II number pooling costs should be recoverable.**
- **FCC's cost recovery mechanism should address costs associated with state trials that have been not been addressed by the states.**
- **The simplest cost recovery mechanism is to allow temporary modification to the existing end user line charge for LNP.**

Status of Number Pooling in BellSouth

<u>State/NPA</u>	<u>MSA</u>	<u>Pool Start</u>
FL - 954	Ft. Lauderdale	01/22/01
FL - 561	West Palm Beach	02/05/01
	Fort Pierce-Pt. St. Lucie	09/17/01
FL- 904	Jacksonville	04/02/01
	Daytona Beach	07/16/01
FL- 305	Florida Keys	05/28/01
TN - 615	Nashville	05/04/02
TN - 901	Memphis	08/17/01
NC – 704/980	Charlotte	09/14/01
NC – 919/984	Durham/Raleigh/Goldsboro	10/26/01