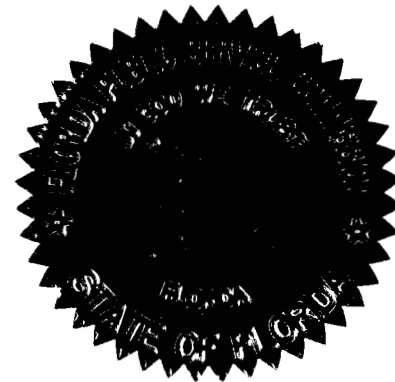


BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

: DOCKET NO. 990373-TP
:
In the Matter of :
:
Establishment of a :
statewide emergency area :
relief plan. :



PROCEEDINGS: AGENDA CONFERENCE
ITEM NO. 4A**

BEFORE: CHAIRMAN JOE GARCIA
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER JULIA L. JOHNSON
COMMISSIONER E. LEON JACOBS, JR.

DATE: Tuesday, March 30, 1999

TIME: Commenced at 9:40 a.m.
Concluded at 11:30 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JOY KELLY, CSR, RPR
FPSC Chief, Bureau of Reporting

DOCUMENT NUMBER-DATE

04127 MAR 31 88

FPSC-RECORDS/REPORTING



State of Florida

Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: April 1, 1999

TO: Blanca Bayó, Director, Records and Reporting

FROM: Joy Kelly, Chief, Bureau of Reporting

RE: DOCKET NOS. 990373-TP. Item No. 4 of 3-30-99 Agenda Conference.

RE: ESTABLISHMENT OF A STATEWIDE EMERGENCY AREA RELIEF PLAN.

DOCUMENT NO. 04127, 3-31-99

The transcript for the above transcribed hearing has been completed and is forwarded for placement in the docket file, including attachments.

Please note that Staff distribution of this transcript was made to:

LEGAL, AFAD, CMU

Acknowledged by:

mez

JK/pc

PSC/RAR 28 (Rev7/94)

1 **PARTICIPATING:**

2 **JUNE MCKINNEY**, FPSC Division of Legal
3 Services.

4 **SALLY SIMMONS** and **LEVENT ILERI**, FPSC
5 Division of Communications.

6 **RON CONNERS**, Director of NANPA, teleconferencing

7 **FLOYD SELF**, AT&T and AT&T Wireless

8 **DONNA McNULTY**, MCI WorldCom

9 **MONICA BARONE** and **CHARLES REHWINKEL**, Sprint
10 Communications Company.

11 **STAN GREER**, BellSouth

12

13

14

15

16

17

18

19

20

21

22

23

24

25

P R O C E E D I N G S

(Hearing convened at 9:40 a. m.)

* * * * *

CHAIRMAN GARCIA: We are now on 4A.

MS. MCKINNEY: Good morning, Commissioners.

We're bringing this recommendation before you because we believe that the state of Florida is in a state of emergency. It's an emergency because NANPA has made it an emergency. It was brought to our attention on March 15th, 1999, that five area codes were in jeopardy: 904, 305, 561, 954, and 904. This caused Staff great concern primarily because one of the area codes was 305 and it was exhausting 12 years prematurely. This Commission issued an order pertaining to that on January 6th, 1998.

To also support Staff's concern is the question of NANPA's reliability. Staff has been given consistent conflicting information. At first we were told that the 904 area code as going to be in jeopardy. And then NANPA informed us that it was not. Afterwards, we were told that 561 and 954 were in extraordinary jeopardy. We received letters as such. However, last Friday, after the recommendation was filed, Staff was informed that both the 561 area code and 954 exhaust dates were set off. The 561 area code

1 exhaust being to 2007 and the 954 exhaust being to
2 2009. That was directly contradictory to the
3 information that the Director of NANPA, Ron Conners,
4 sent us pertaining to how many NXXs were left.

5 Additionally, Commissioners, this very
6 morning we received a call from Wayne Melby and he
7 informed us that all the NXXs are gone in the 305 area
8 code.

9 It is apparent that the information as
10 provided to Staff is unreliable and contradictory, and
11 it is possible that there are more area codes in
12 jeopardy in Florida.

13 Staff is bringing this to you because we
14 feel the Commission needs to take some action before
15 area codes exhaust, which would inflict millions of
16 dollars on customers in Florida.

17 Staff understands that our recommendation is
18 an extreme measure. We believe, however, that it is
19 necessary in order to protect Floridians. The
20 Commission has the jurisdiction to declare an
21 emergency and needs to take action to protect our
22 state. Staff considered waiting for a ruling from the
23 FCC, as other states have done, but based on the
24 particular circumstances surrounding Florida, and all
25 of the conflicting unreliable information that we

1 received, we thought it was best that this Commission
2 take action at this time.

3 In New York and Massachusetts at this time
4 they are waiting for an answer from the FCC, and it
5 could take months if, in fact, Staff had decided to
6 take that route. Staff has mirrored what was done in
7 California in this recommendation.

8 And, Commissioners, there are industry reps
9 here to speak and Staff is available for questions if
10 you have any.

11 **CHAIRMAN GARCIA:** Commissioners, I want to
12 say that I basically took the Staff recommendation and
13 ran with it to make sure that action of some kind was
14 reflected to the federal government.

15 When this Commission has to go before the
16 citizens of this state, in countless hearings that we
17 have had throughout this state, and we vote out
18 issues, like in particular the Florida Keys, where we
19 created a solution for a specific problem and told the
20 people in the Florida Keys, "Don't worry about it.
21 You have 12 years," we, to some degree, burdened the
22 people until Dade County to give the people in the
23 Florida Keys precisely what they wanted, and we find
24 that we've already exhausted what should have been 12
25 years in less than a year.

1 When we go to areas like 941 where we are
2 conducting a series of hearings I believe next week
3 and one gets lettering from those involved, which are
4 very critical of this Commission and its policies, and
5 reads the letter and finds it's hard to disagree with
6 the person that filed the objection because there are
7 some very valid points made there. And then one looks
8 behind the numbers that have been given to us by the
9 North American Numbering Plan Administer and find that
10 in every single one of those area codes in our state
11 over 50% of the numbers are left and capable of being
12 used, but they've just simply be distributed. I
13 question whether this Commission should have any
14 jurisdiction; should step back and stop giving
15 guarantees to the people of Florida that we have no
16 authority to enforce and let the FCC do it.

17 Now, I have to say before I go any further
18 that I did receive a call from Cathy Brown of the --
19 Chief of the Common Carrier, Bureau of the FCC. I can
20 say that it was a cordial call under the
21 circumstances, and she was very willing to work with
22 this Commission and stated so. So I do hold out that
23 prospect of trying to figure out something.

24 But, Commissioners, the numbers that the
25 Staff filed in this report, of the four, with one

1 exception, over 60% of those numbers are still
2 available of the ones that have been distributed.
3 This numbering plan that they created a long time ago
4 may have been fine when we had one competitive carrier
5 in Florida. We have now over 200 and it becomes very
6 difficult to work.

7 I guess -- do the parties want to speak on
8 this, or are these just for information?

9 Let me just say -- because I don't want to
10 go too far. I know we have Mr. Conners from the North
11 American Numbering Plan Administrator who's on the
12 phone to answer any questions; is that correct,
13 Mr. Conners?

14 **MR. CONNERS:** I'm here and available.

15 **CHAIRMAN GARCIA:** Great. Thank you.

16 **COMMISSIONER JOHNSON:** Let me make one
17 statement with respect to Mr. Conners.

18 I received a call from them last week and
19 they were intending to fly down late last night but
20 their plane was cancelled. I understand that Barry
21 Bishop is also available by telephone. He handles
22 most of the pooling issues. Mr. Conners, of course,
23 is the Director of NANPA and has been trying to follow
24 and assist us with the issues that have been raised by
25 Staff. And I asked Mr. Conners to go ahead and

1 participate by phone to the extent that there were any
2 technical questions or issues we may have for him that
3 he might be available to address them for us, and he's
4 out of D.C. Director of NANPA Services.

5 I had a question for Staff, Mr. Chairman.

6 **CHAIRMAN GARCIA:** Go right ahead.

7 **COMMISSIONER JOHNSON:** With respect -- I
8 know Issue 1 says that we should find that the area
9 code emergency exists. Certainly I concur with all of
10 the statements that were made in the Staff analysis,
11 and I know you all have been working very hard in
12 providing the information to the Commissioners and I'm
13 appreciative of that.

14 I agree with everything that you said with
15 respect to there is a problem. We do have shortages
16 in numbers. We have made some representations based
17 upon projections that we have received, particularly
18 in the 305 area. But my question is the best way to
19 respond to that.

20 Mr. Chairman, under your advice and counsel
21 I had the opportunity in the last couple of weeks to
22 have Staff in several meetings as we talk with the
23 members of the FCC and members of NANPA and members of
24 NANC to help us sort through these issues. And I
25 understand the Staff is very, very frustrated as they

1 were not able to get a lot of information they
2 requested early on. But through a process of a series
3 of calls we have been receiving more and more
4 information and I think that that, indeed, it is good.

5 Ultimately, I think we all agree that there
6 are some serious issues that must be addressed. The
7 dilemma, or my concern, is how we go about finding the
8 right answer to protect the citizens of the state of
9 Florida, and what's going to get us the right answer
10 versus what's going to have us in a litigious process
11 that might overwhelm us in such a way that we don't
12 get the kind of answers that we want.

13 As you stated, you've spoken with the
14 Chairman's office at the FCC, and I have had the
15 opportunity to do that too. And the FCC has expressed
16 an acknowledgement that there are issues and a
17 willingness to try to work with us to find some real
18 resolutions to these real problems that face the
19 citizens of the state of Florida.

20 And my question goes to two. With one, with
21 respect to the actions that we put forward, my first
22 concern is -- actually it's not my first concern -- my
23 first concern probably isn't whether we have the legal
24 authority. That's an outstanding question. But
25 whether this is the right approach to take.

1 Ms. McKinney, in your statement you stated
2 that we could take the approach that several states
3 have taken, and that is to file a petition with the
4 FCC and ask for them to give us the authority to do
5 some of the things we've suggested here. But Staff
6 recommends against that.

7 I'd like to explore that some because I
8 think that that is the proper course of action to
9 take. I understand -- and you mentioned California
10 and a lot of your analysis goes to the approach that
11 California took. And in the California situation they
12 did file for authority, or a waiver or exemption with
13 the FCC. And it's my understanding that the FCC acted
14 upon that within a month. And I do have a letter from
15 them. What's Yog's last name?

16 **MS. McKINNEY:** Varma.

17 **COMMISSIONER JOHNSON:** Varma. And I've also
18 had a commitment from the FCC that they would -- they
19 understand the issues; that the Chairman did an
20 excellent job of making sure they understood the
21 issues, and that they were going to work with us to
22 find the right resolution.

23 Candidly, it would be their opinion, of
24 course, that we don't have the authority to start
25 telling NANPA what to do and to give us numbers to do

1 pooling; and that they have the authority. But that
2 has not been an in-your-face kind of proposition.
3 It's been, therefore, "Work with us. Look what we did
4 for California. We allowed them to do pooling. We
5 allowed them to do a lot of things that they had
6 already been doing, but that we will work
7 expeditiously --" and we have their commitment that we
8 will work expeditiously, not only with the Commission,
9 but the industry members and how they might be
10 impacted by this, to get us where we need to be.

11 And I guess my question goes to wouldn't
12 that be a logical approach to take? That is, filing a
13 petition -- everything we've requested here. Request
14 that, but going through a formal process of request to
15 resolve some of the issues that have been resolved.
16 Not just for Florida. I know these issues are all
17 across the nation. And not waiting on the FCC to come
18 up with their final rules, because that process,
19 admittedly they said, may take another year. But
20 through the petitioning process as a process by which
21 we can get our questions and our issues resolved.

22 **MS. MCKINNEY:** Commissioner, I would agree
23 with you that California, they filed their petition on
24 November 3rd, 1998, and they did receive permission
25 for extended authority on December 3rd, 1998. So

1 their process was quick. However, there are other
2 states out there, New York, Massachusetts, in which
3 they filed their petitions and their final comments --
4 New York specifically filed their petition on February
5 9th, 1999. Their final comments aren't due until
6 April 16th, so that's not a month process. After the
7 comments then a decision has to be made.

8 Specifically in Massachusetts, they filed
9 for a waiver on February 17th, 1999, and their
10 comments are also due in April 1999. So even though
11 California received a very expedited answer within a
12 month of time, there was no guarantee that Florida
13 would receive the same treatment. And that's why
14 Staff brought our concerns to the Commission because
15 we felt this was of such urgency. And, again, I want
16 to reiterate, throughout this process as we have been
17 receiving contradictory information, as I informed
18 you, we have no NXXs left in 305. So if we were to
19 have waited to go through the process, no telling what
20 would have happened to the NXXs in other area codes.
21 And that's why Staff chose to bring the recommendation
22 to the Commission for action.

23 **COMMISSIONER JOHNSON:** Those states, they
24 don't have Chairman Joe Garcia --

25 **MS. MCKINNEY:** I would agree with that,

1 Commissioner.

2 **MR. SELF:** -- to get the attention of the
3 FCC to have them track me down over the weekend at
4 home to tell us that they are going to work with us on
5 this matter.

6 **CHAIRMAN GARCIA:** It worries me that they
7 were able to find you somewhere in the hinterlands of
8 Canada to call me and chastise me.

9 **COMMISSIONER JOHNSON:** But those -- with
10 respect to a couple of issues that you raised --
11 although even the California order -- and they're
12 acting on the California order, that's an interim
13 mechanism that they did understand the nature of the
14 emergency and I think we brought that to their
15 attention. And they understand the nature of the
16 emergency here too. And perhaps we'd ask even if --
17 if they did something on an interim basis, that they
18 do that and that they still go through their notice
19 process and all of those processes also. It's my
20 understanding that they've agreed from the top up to
21 meet with Staff next Monday.

22 **MS. MCKINNEY:** April 5th, yes, Commissioner.

23 **COMMISSIONER JOHNSON:** And they are sending
24 down individuals tomorrow that NANPA -- not the FCC
25 but NANPA will be sending down members of their group

1 tomorrow --

2 **MS. MCKINNEY:** At 3 o'clock.

3 **COMMISSIONER JOHNSON:** -- to help us answer
4 all of the questions that we've not received answer
5 to, and to act in a more methodical and direct
6 approach to resolving some of the issues, or at least
7 putting us on a road to resolving some of the issues
8 of concern that are legitimate that have been raised
9 by Staff.

10 **COMMISSIONER JACOBS:** Mr. Chairman, if it
11 would be appropriate, I'd like to hear -- I didn't
12 know if Mr. Conners had comments to offer or not. But
13 if he does, I'd like to hear those and then I'd like
14 to hear from the parties.

15 **CHAIRMAN GARCIA:** I don't think Mr. Conners
16 had any comments to make. Is that correct,
17 Mr. Conners? You just wanted to comment if there were
18 some questions?

19 **MR. CONNERS:** I would be happy to make some
20 comments if that seems appropriate. There are,
21 perhaps, a couple of areas where I could set the
22 record straight on this conflicting information.

23 **CHAIRMAN GARCIA:** Okay. All right,
24 Mr. Conners, why don't we then hear from you, and then
25 identify yourself and let us hear from you on those

1 issues you'd like to clarify.

2 **MR. CONNERS:** My name is Ron Connors. Can
3 you hear me okay?

4 **CHAIRMAN GARCIA:** You might want to speak up
5 just a little bit more but we can hear you.

6 **MR. CONNERS:** Yes. Is that better?

7 **CHAIRMAN GARCIA:** Yes.

8 **MR. CONNERS:** Okay. My name is Ron Connors.
9 I'm the Director of North American Numbering Plan
10 Administration in Washington D.C. And our
11 responsibility is the assignment of central office
12 codes and area codes throughout the U. S.

13 Let me start by offering my apologies to the
14 Staff. Apparently there has been some
15 miscommunication or lack of communication, which I
16 personally guarantee you will be resolved in the near
17 future so that we can equip your people with more
18 facts as to what's happening with the numbers in
19 Florida.

20 Let me assure you that the situation in
21 Florida is not unique. Although we have just declared
22 four new area codes in Florida in jeopardy, this is a
23 very common situation throughout the United States
24 and, in fact, we have more than 60 area codes in
25 jeopardy throughout the U. S. at this time. So the

1 rush on numbers, if you will, or the rush on central
2 office codes, is not at all unique to Florida.

3 The jeopardy -- (mike squeals) -- I'm sorry?

4 **CHAIRMAN GARCIA:** You're fine. You echoed
5 yourself.

6 **MR. CONNERS:** Okay. The jeopardy process
7 that we are introducing with this call actually will
8 take steps to throttle down, if you will, the demand
9 on codes until the industry can come to terms with
10 what to do here. So there is a check process that's
11 gone into effect here in order to slow things down so
12 that we can, essentially, move forward toward whatever
13 the right move is.

14 So that will assist you, and in the sense
15 give you some time should you decide to approach the
16 FCC and try to implement something else. So we'll be
17 with you and we'll be able to help you along those
18 lines as that goes on.

19 Let me point out just one other thing, if I
20 may, and that's there's a distinction between number
21 utilization and the central office code utilization.
22 And although it is quite true that the numbers within
23 the central office codes may not be fully utilized,
24 when we come right down to it, because of the way the
25 system works today, that is numbers are assigned in

1 blocks of 10,000, is the fact that the number supply
2 is not totally well utilized does not prevent you from
3 the need to introduce a new area code. But some of
4 the other techniques that I know the Staff has been
5 thinking about, like pooling, will indeed help with
6 that situation. I'd be happy to answer any questions
7 you have.

8 **CHAIRMAN GARCIA:** Mr. Conners, if I can ask
9 a quick question: Where are we with 305? A code that
10 we, I thought, worked out a -- in fact, I think it was
11 Commissioner Clark who, to some degree, presented that
12 concept of the distributed overlay, or a very specific
13 overlay response to the people of the Florida Keys
14 who -- Florida always worries they are going to try to
15 secede from the Union; creating this happy situation
16 which gave them 12 years of life. And we find now
17 that -- in less than a year from that final order we
18 find ourselves without area codes in the Florida Keys
19 or without NXXs in the Florida Keys.

20 What can you tell us about what happens in
21 the Florida Keys? Are we now forced to go to 10-digit
22 dialing in the Florida Keys? Are we forced to do --
23 we know by your own regulations we can't do an area
24 code split down there, so what situation are we in?

25 **MR. CONNERS:** Well, let me fill you in a

1 little bit on some of the history. And it's going to
2 have to be reconstructed history because that plan was
3 put in place before the time before we became the
4 administrator. So I can only speculate as to what
5 happened, but it's a very common situation throughout
6 the U. S.

7 At the time that that plan was set up, they
8 must have based that 20-code allocation on historical
9 data which showed a very low growth rate for the Keys;
10 in Monroe County in general. In fact, I believe it
11 was 1.2 codes per month.

12 And what happened in reality is that that
13 historical estimate did not include the type of demand
14 we're seeing today for wireless and CLECs. And,
15 essentially, those folks came in and asked for and
16 received assignments in 305 in Monroe County. And the
17 guidelines, the industry guidelines, that we follow do
18 not permit us to deny assignment to these people.
19 That was one of the things that was not in the Order.
20 It essentially set aside 20 codes, but it did not put
21 any limitations or any restrictions that would
22 restrict assignments of those codes. So, essentially,
23 we were required to make the assignments.

24 Let me add one of other thing to that, and
25 that's that we have set aside 12 additional codes that

1 are available for the Keys here for the interim. And
2 having declared now 305 in jeopardy, what we will do
3 is to meet with the industry and try to decide exactly
4 what the limitations ought to be on the assignment of
5 those 12 codes. At the moment we've put a freeze on
6 assigning there, and it's conceivable, for example,
7 that the industry may recommend that one code per year
8 be assigned to the Keys. So the industry will be
9 looking at that on its own and trying to come up with
10 a mechanism so that -- to control the outflow of
11 codes.

12 **CHAIRMAN GARCIA:** I hope that doesn't mean,
13 Mr. Conners, to some degree we weren't going to stifle
14 competition in the Florida Keys or the new entrants
15 into the Florida Keys market.

16 **MR. CONYERS:** It's not intended to stifle
17 competition by any means. What it is, it's an attempt
18 to try to control the outflow of codes in a way that
19 is fair to all of the service providers until such
20 time as the industry and the Florida Commission can
21 make a decision on the best path forward for Monroe
22 County.

23 **COMMISSIONER JACOBS:** You specified that the
24 jeopardy process does something different. And you
25 just indicated that as a result of that you can assign

1 additional numbers. Could you kind of outline what
2 that jeopardy process entails and what it means, not
3 only in the 305 but in the other area codes?

4 **MR. CONNERS:** Sure. What happens here is
5 the jeopardy process is really kind of an insurance
6 policy, a wake-up call. It says we are getting low on
7 codes. And we need to do something in order to take
8 some steps to make sure that we don't fully run out.

9 And what we do at that point is to convene
10 the industry and we act as an facilitator. And the
11 industry then will come up with a plan to try to
12 extend the life of the code until such time as we can
13 implement some sort of a relief plan yet to be
14 determined.

15 Almost always that jeopardy involves some
16 kind of code rationing, which will essentially involve
17 a lot of reprocess, to make it fair, which will
18 essentially throttle down the demand for codes. Does
19 that help?

20 **COMMISSIONER JACOBS:** Thank you.

21 **COMMISSIONER JOHNSON:** Mr. Connors might
22 have said this and I could have been writing notes,
23 but right now under the current jeopardy, NANPA is
24 instead of releasing numbers in 10,000 block
25 increments, to the extent that they are released, they

1 are releasing them in 300 block, or what is the
2 actual, for lack of a better word, rationing?

3 **MR. CONNERS:** We're still releasing -- even
4 in a rationing mode we're still releasing codes in
5 blocks of 10,000.

6 **COMMISSIONER JOHNSON:** Even during the
7 jeopardy period the numbers are being released in
8 10,000 blocks?

9 **MR. CONNERS:** That's correct. It would take
10 a move to pooling in order to reduce that to the 1,000
11 blocks. And that's a much bigger issue.

12 **COMMISSIONER DEASON:** Mr. Connors, you have
13 the authority to implement pooling?

14 **MR. CONNERS:** No, we do not at this point.

15 **COMMISSIONER DEASON:** Who has the authority
16 to do that?

17 **MR. CONNERS:** That's between you and the
18 FCC.

19 **COMMISSIONER DEASON:** Does this Commission
20 have the authority to tell you to implement pooling or
21 we can only do that in conjunction with the FCC, or is
22 it really the FCC's call and we just give input to the
23 FCC?

24 **MR. CONNERS:** It's my understanding that it
25 would be the two of you that would be involved in

1 that. I'm not an attorney so I can't give you an
2 official reading on that.

3 **COMMISSIONER DEASON:** What would be your
4 reaction if this Commission told you to implement
5 pooling?

6 **MR. CONNERS:** There are other issues that we
7 need to worry about. For example, there are tools --

8 **COMMISSIONER DEASON:** Mr. Connors, I know
9 there are other issues. Would you please answer my
10 question: What would you do if this Commission
11 instructed you to implement pooling?

12 **MR. CONNERS:** We would take your request to
13 our official supervisor, the North American Numbering
14 Council, who would probably turn around and ask the
15 FCC.

16 **COMMISSIONER DEASON:** Thank you.

17 **COMMISSIONER CLARK:** Let me ask Staff a
18 question. I thought your recommendation was that
19 authority to do rationing had been delegated to
20 Pennsylvania? Am I wrong that the FCC has recognized
21 that the states could take some action in rationing
22 situations?

23 **MS. MCKINNEY:** Yes, Commissioner Clark. In
24 the Pennsylvania order in September of 1998 the FCC
25 extended the authority and gave state Commissions the

1 authority to order NXX code rationing only in
2 conjunction with area code relief decisions where the
3 industry had not reached a consensus in rationing
4 plans.

5 There's some conflicting things going on.
6 In most of the states the reason they were allowed to
7 do the number conservation measures that they
8 implemented was because the carriers volunteered and
9 gave the numbers back. So that's a big issue. But
10 Pennsylvania did extend the authority of the states.
11 The Pennsylvania order.

12 **COMMISSIONER CLARK:** I guess we have to now
13 call on volunteers; is that what we need to do?

14 **MS. MCKINNEY:** Commissioner Clark, actually
15 that would be very helpful. That's how come it worked
16 in Texas, Illinois, Kentucky, Colorado, New Hampshire
17 and New York. Just so the Commissioners are aware,
18 last week, after the recommendation was filed, there
19 are some carriers that did give some NXXs back.

20 **COMMISSIONER CLARK:** Mr. Chairman, maybe
21 it's appropriate now to hear from the parties and
22 maybe we'll have more volunteers.

23 **CHAIRMAN GARCIA:** Absolutely. Maybe we can
24 start with you, Mr. Self. Identify yourself for the
25 record, then we'll go from there.

1 **MR. SELF:** Thank you, Chairman Garcia. I'm
2 Floyd Self of the Messer, Caparello & Self law firm
3 and I'm representing AT&T and AT&T Wireless Services.

4 The first thing I'd like to say,
5 Commissioners, is that the administration --

6 **COMMISSIONER CLARK:** Mr. Self, can I ask you
7 just a question? When you say AT&T, is that who --
8 who is that? Is that everybody else or just Wireless?

9 **MR. SELF:** AT&T Wireless Services is the
10 cellular operations in Florida, and AT&T would be the
11 local and long distance operations.

12 **COMMISSIONER JOHNSON:** And you're
13 representing both?

14 **MR. SELF:** Yes, ma'am.

15 The first thing I'd like to say is that the
16 adverse consequences to customers of an NPA exhaust
17 situation is taken extremely seriously by AT&T and
18 AT&T Wireless Services, and I believe the entire
19 industry, based upon the discussions I have had with
20 some of the other parties that are sitting at the
21 table this morning.

22 AT&T and AT&T Wireless believe the
23 compliance with the NANPA rules for NXX code
24 assignments are critical to insuring that customers
25 have access to numbers when they want and need them.

1 We, therefore, share with you your grave concern for
2 the status of NXX code availability in the Keys, as
3 well as throughout Florida, and all of the
4 ramifications of NPA exhaust.

5 However, at this time we believe that the
6 Staff's recommendation to Issue 2, immediate final
7 order, is not appropriate at this time. While it's
8 not appropriate for the Commission at the time to act
9 in this manner, we do believe that it's important for
10 you to understand, as you've already heard to some
11 degree, that it's not a situation of nothing is being
12 done, nor is it a situation where you are powerless to
13 act.

14 **CHAIRMAN GARCIA:** Mr. Conners says maybe we
15 made a mistake when we issued those area codes in the
16 Keys; that we should have, in our order, have put
17 limitations as to how those numbers were distributed.
18 Do you believe we can do that today? In other words,
19 enforce a limitation which the administer just said
20 that we could? That we should have and we have put
21 ourselves --

22 **MR. SELF:** I don't believe that you have the
23 authority to do that. You do have the authority to
24 work with the FCC to establish a number pooling
25 arrangement and you can take those to the FCC and get

1 those approved.

2 The industry as part of the number
3 conservation and jeopardy procedures can certainly
4 agree to pooling.

5 **CHAIRMAN GARCIA:** You'd agree, Mr. Self,
6 that the industry hasn't agreed to some degree and
7 that's why this Commission has had to step in on some
8 of these area code changes, correct?

9 **MR. SELF:** No, sir. The industry has not
10 agreed yet because the industry meetings have not been
11 held.

12 **CHAIRMAN GARCIA:** But on area codes that we
13 have had to decide, the industry has not been able to
14 come up with a consensus in total. In other words,
15 there are industry members who have not agreed to come
16 up and present an agreed system before this
17 Commission, therefore, requiring us to step in and
18 solve your disputes.

19 **MR. SELF:** That is correct. I can't speak
20 for the historical situation but certainly to the
21 extent that there's not industry consensus, you are
22 authorized to therefore develop an NPA relief plan,
23 and subsequently conservation jeopardy measures that
24 may be required. But that's only in the situation as
25 the Pennsylvania order makes very clear, where there

1 is no industry consensus for NPA relief.

2 And the first meetings -- two of the NPAs
3 meetings being held, according to the NANPA Web
4 site -- two of NPAs, 561 and 954, the industry --

5 **CHAIRMAN GARCIA:** But in 561 we'd had
6 already a dispute, because we have had an industry
7 member, if I'm not mistaken, Cellular One, file a
8 letter with this Commission.

9 **MR. ILERI:** It's for 941.

10 **CHAIRMAN GARCIA:** I'm sorry, 941. In that
11 particular case, 941, the company filed a protest to
12 the order of this Commission on geographic -- it
13 wasn't an order of this Commission, it was to an
14 agreement reached by the industry, right?

15 **MS. MCKINNEY:** Correct, Commissioner.

16 **MR. SELF:** I'm sorry, sir. Was that a --

17 **CHAIRMAN GARCIA:** It strikes me that here we
18 end up -- and I respect Mr. Conner's word and what
19 you're trying to do. The truth is the industry hasn't
20 been able to reach agreement when they present these
21 plans. And I wish it could. Because even if it
22 could, I doubt that I still don't have jurisdiction.
23 Because if I remember correctly the industry thought
24 it was a fantastic idea to go to 10-digit dialing when
25 it initially began down that road. And then it

1 diverged from itself. In your particular case, you
2 represent AT&T, AT&T Wireless on this particular
3 issue, many years ago your industry in, for example,
4 New York agreed to take a separate area code, which
5 would have put us in a better position. But today, in
6 a competitive model, this Commission has sort of
7 followed the lead of FCC of not doing. And so we find
8 ourselves -- and, Mr. Self, that's the difficulty that
9 we have. It's not necessarily trying to create an
10 ambit for you to enter and compete and participate in
11 our state. We invite you. We welcome you. I think
12 this Staff does as good a job as any Commission in the
13 country of trying to create the right environment. We
14 may disagree on some of the particulars but I think we
15 try to open our market.

16 The problem is on this particular issue we
17 are creating a tremendous amount of burden to
18 Floridians, and your industry is creating a tremendous
19 burden to this Commission. It is tough for me to walk
20 through the city of Miami, of which I am a resident,
21 or to the county of -- Miami Dade County and not find
22 myself just having to engage in a 15-minute discussion
23 of why everyone now has to dial 10 digits. Obviously
24 that would be much easier if we implemented it across
25 the board. Had we known that the administrator has

1 this little control of the distribution of these
2 numbers, we could have gone that route earlier on and
3 we wouldn't have caused all of the headache we've
4 caused. We've caused millions of dollars -- of
5 competitors, just like yourself. Because it
6 cost millions of dollars to reprogram phones in the
7 state. It cost the alarm industry millions of dollars
8 to reprogram alarm systems. And I worry that as we
9 try to reach consensus, in less than a week and a half
10 from when Staff began this process, we find we have
11 lost the numbers in the Florida Keys. And, you know,
12 I don't know if you are going to reach consensus. I
13 doubt it. You haven't for quite a while.

14 **COMMISSIONER DEASON:** Just a second.
15 Mr. Chairman, let me ask a question. You raised a
16 point and I need some clarification.

17 And obviously the order in the 305 situation
18 previously addressing the Florida Keys, that order
19 addressed an allocation of central office codes but
20 did not address the utilization of those codes. It
21 was assumed they would be utilized, perhaps, as some
22 type of historic utilization rate, and it would be
23 sufficient to last until the year 2012.

24 The question I have: If that order had
25 specifically said that there is to be some type of

1 rationing or pooling or some other type of a
2 conservation measure, would we have had the legal
3 authority to have done that? And even if that
4 language had been in there, would that have been
5 implemented by the administrator?

6 **MS. MCKINNEY:** Commissioner Deason, it's a
7 close call, and reasonable minds would differ as to
8 what jurisdiction state commissions have when it comes
9 to number conservation. Historically, or originally,
10 the Second Report and Order came out which
11 specifically gave -- and that's August 8th, 1996 -- it
12 delegated the authority to implement new area codes to
13 state commissions. And it retained the general
14 authority by the FCC to set policy for numbering
15 administration.

16 We've talked about the Pennsylvania order
17 briefly. And at that time the FCC extended and gave
18 states additional limited authority. Again, only to
19 order NXX code rationing in conjunction with area code
20 relief decisions where the industry had not reached a
21 consistent or rationing plan.

22 In that same order Illinois was also given
23 authority. The FCC has specifically given state
24 Commissions authority when the carriers volunteer and
25 give their numbers back. State commissions could do

1 whatever number conservation method they chose if the
2 carriers have volunteered. So that's specific; that
3 they were to give it.

4 The California decision is a little
5 different, because California went ahead and
6 implemented their plan. They went ahead and did their
7 lottery system, the number conservation method,
8 without getting the FCC approval first. So they
9 implemented their plan in September of 1996. The
10 commission instituted numbering conservation,
11 specifically a lottery, and the number conservation
12 was to conserve the NXX codes and preserve the need
13 for additional numbers. They went on later on to ask
14 the FCC for additional authority, which they did, on
15 November 3rd, and they received limited authority on
16 December 1st.

17 So it is Staff's opinion that the California
18 order is precedent for what Florida wants to do. It's
19 a road map. Because we're trying to follow exactly
20 what they did. And the FCC allowed them to do that.

21 **COMMISSIONER DEASON:** Thank you. I'm sorry,
22 Mr. Self. I just wanted to get that clarified.

23 **MR. SELF:** That's okay, Commissioner.

24 Chairman Garcia, in order to respond to your
25 concern about the potential lack for consensus, I

1 think my fundamental problem is that today you haven't
2 given the parties the opportunity to determine whether
3 they can reach consensus or not.

4 The jeopardy situation for four of the area
5 codes has just been done in the last week or two. The
6 first two meetings for two of the area codes is
7 scheduled for tomorrow; a third one is for Tuesday of
8 next week. The fact of the matter is that there is a
9 process to address these situations, and I think you
10 need to give that process an opportunity to work.

11 I could speak from my own personal
12 experience. The first time that there was a problem
13 with the 305 NPA, four, five years ago -- the relief
14 plan that ultimately led to Broward County being split
15 off. At that point, because there was a jeopardy
16 situation, the industry came together and one of the
17 things that the industry did at that particular point
18 in time was to appoint a special Code Review
19 Committee, which consisted of a representative from
20 BellSouth as well as two representatives from the
21 industry. I was one of the two representatives from
22 the industry.

23 Each month we -- the three of us reviewed
24 the applications for NXX codes, compared them to the
25 guidelines and made sure that the requests that were

1 being made for NXX codes were valid under the rules
2 and under the special jeopardy situation that existed
3 at that time. We granted some. We rejected some.
4 And the end result of that process was there was
5 sufficient NXX codes to get the state -- to get Dade
6 and Broward County to the point where the new NPA for
7 Broward County took effect.

8 The industry has the capability, certainly
9 has the interest, and believe me, if they didn't last
10 week, they certainly this week know this is a matter
11 of the utmost importance to not just this Commission
12 but to all Floridians that are affected by this.

13 I think what you have in terms of the
14 Staff's recommendation to go to an emergency final
15 order, first with respect to the entire state of
16 Florida, you have at best conflicting data, even if
17 you believe it at its worse --

18 **CHAIRMAN GARCIA:** I agree. The
19 administrator that we're supposed to work with this
20 week told us -- if I'm not mistaken -- Staff, correct
21 me if I'm wrong -- that 561 was going to run out.
22 That 941 was going to run out. 954 was going to run
23 out. And the Florida Keys was going to run out. And
24 they told us, "And by the way, 904 is going to run
25 out." Then they say, "Sorry. Mistake."

1 They are the experts, not I. And clearly
2 what happens is maybe there's a different time and
3 space that operates in the Keys. I've always believed
4 that, as a matter of fact. That we had 12 years and
5 now we have less than a year worries me greatly. And
6 it is no reflection on your inability to get together.
7 It is simply a reflection of where I find myself as
8 having to some degree represent the state as a whole
9 in trying to explain to people, "Sorry. By the way,
10 our order was wrong." Or, as Mr. Conners points out,
11 and I think Commissioner Deason clarified for him --
12 it almost sounds like Mr. Conners would agree if we
13 had put some limitations in that order back then -- I
14 guess to some degree he thinks maybe it's our error of
15 not having created some system in our order. If
16 that's the case, Mr. Conners agrees that we have
17 authority; maybe that's what we should be doing at
18 this hearing. Maybe we should just put limitations --
19 which is probably what we're trying to do -- put
20 limitations across the board on how all numbers are
21 sought until we get a waiver from the FCC -- which
22 Commissioner Johnson seems comfortable we will get,
23 and I agree we probably will -- but continuing to
24 operate under the present system clearly isn't
25 working. I mean, clearly, we have had a collapse in

1 the system. We've had a doubling of area codes in the
2 last five or six years, if I'm not mistaken.

3 I'm worried, Mr. Self, that if we continue
4 down the road that we've taken in the past, we're
5 going to end up in a situation whereby we place this
6 Commission in a position where it has to decide
7 under -- what began as a hangnail, something that
8 could have been taken care of in Washington, we're
9 amputating an arm here. Because we have to go all the
10 way down this process to fix.

11 And with all due respect to the system that
12 is in place, we now find, when we look behind these
13 numbers, that that system isn't working, or it doesn't
14 work the way it should work, or it doesn't work under
15 this new competitive framework.

16 And, Mr. Self, I respect that we don't know
17 the outcomes of competition. We're heading down this
18 road what we're hoping is better service for the
19 consumer; better prices for the consumer and better
20 technologies for the state. But the truth is maybe
21 the system in place doesn't work under the present
22 situation.

23 **MR. SELF:** Part of the problem, I think,
24 Commissioner Garcia, is the landscape is changing.
25 And I'm not just speaking in terms of the competitive

1 landscape, simply the demand for numbers. If you ask
2 the people in this room how many have at least a cell
3 phone or beeper, probably everybody would say they do.

4 **CHAIRMAN GARCIA:** I accepted that agreement
5 when we started these hearings. I used that as a
6 justification to the Floridians to inconvenience them.
7 When our Staff goes through these numbers we find
8 that's not true. We find that in 941, 63% of the
9 numbers are unused. We find that in 305 in the Keys
10 61% of the numbers distributed are unused. So that's
11 a lie. I mean, I understand that that is a rationale.
12 I can explain it once, twice -- and I went through
13 this state, and it's in every speech I've given on
14 this issue -- when I try to explain to my grandmother
15 why she has to dial 10 digits, and all her friends,
16 who it's an inconvenience for. That's the not case.

17 We find that those numbers are out there.
18 They are just not being used. And so I know there are
19 more numbers, cellular numbers. I know there are more
20 beeper numbers. This Commission is aware of it. This
21 Commission has created the ambit that favors that.
22 But that's not the case. That's not the case.

23 I mean, you can say it, and it almost sounds
24 true -- and it was true to me. I was convinced of it
25 until our Staff went into a little research of our

1 own. And we find that those numbers aren't being used
2 and that isn't the situation we find ourselves in.

3 So someone is wrong here. And I know this
4 Commission -- or I hope this Commission is not going
5 to place itself in a position where we're the ones
6 that are wrong again and we're the ones that are lying
7 to Floridians. And that's not the case.

8 **MR. SELF:** Well, certainly one aspect of
9 this is people have more numbers. But there are other
10 aspects that you do need to look at in which the
11 Commission is in the process of dealing with and which
12 you can do more.

13 One of the things that the industry has
14 discussed in the past, and the Staff just a couple of
15 weeks ago had a workshop on this, in terms of number
16 conservation issues, and that's number pooling which
17 we've discussed. And you can do some of that with the
18 FCC. There's the issue of rate center consolidation.
19 I believe there's maybe five rate centers in the
20 Florida Keys; if you could consolidate some of these
21 rate centers. The problem is a new local landline
22 competitor going into the Keys, if you want to serve
23 all of the Keys, you have to have NXX codes in the
24 five rate centers down there. If you consolidated
25 those five rate centers into a single one, that would

1 relieve some of the need for additional NXX codes.

2 And those are some of the things that you
3 can do and that you can work with the industry, and
4 which the industry is, in fact, trying to do now.

5 I can appreciate your frustration with the
6 fact that some of this isn't happening fast enough.
7 But some of the facts are, indeed, running faster than
8 we can deal with them at the moment. But the fact of
9 the matter is there are processes in place that can
10 deal with these situations. And certainly with
11 respect to your Staff recommendation, to declare an
12 emergency that pertains to the entire state of
13 Florida, there are no facts that would support that at
14 the moment. And at least with respect to 305, because
15 you're still in the early stages of the industry
16 attempts to solve these problems -- you've heard from
17 the NANPA administrator already this morning in terms
18 of assignment of additional codes. I think you should
19 work expeditiously to get with the FCC to talk about
20 number pooling and some of the other solutions that
21 are available to you.

22 **COMMISSIONER JOHNSON:** But, Mr. Self, there
23 are those things -- I appreciate everything you have
24 said and there are some issues we have to work through
25 in a very methodical way. But there are some things

1 that need to be done now. And there are some things
2 we will need industry participation in and perhaps --
3 not perhaps, but in fact industry cooperation.

4 **MR. SELF:** Sure.

5 **COMMISSIONER JOHNSON:** One of the issues we
6 raised as we try to get through this process -- as we
7 stated, Staff is holding workshops trying to find ways
8 to come up with a conservation mechanism. The FCC,
9 they have rulemakings out there that probably will not
10 be complete until the first quarter of 2000. We don't
11 have that kind of time.

12 **MR. SELF:** I understand that, but --

13 **COMMISSIONER JOHNSON:** One of the things
14 that was raised, and maybe it was Commissioner Clark
15 that at least teed up the issue, or perhaps
16 Commissioner Jacobs, and that is: While we try to
17 work through this process -- because I do think we
18 want to have authority to require mandatory pooling,
19 mandatory rationing, mandatory pull back. And it may
20 be a little different for cellular providers -- which
21 I understand it is even in other states -- because
22 there are some real technical constraints with respect
23 to the cellular providers. But I think we should
24 pursue a course of action that will give us the legal
25 authority to have not just a voluntary mechanism but a

1 mandatory mechanism in place. But in the interim, I
2 think it would be an offer of good faith for the
3 industry to let us know what they are willing to do
4 now in terms of volunteering. Because there's nothing
5 to stop us; nothing legally, nothing procedurally to
6 stop us if you are willing to give back numbers; if
7 you are willing to go to 1,000-block pooling. Those
8 are the kind of comments. And if the other industry
9 members can think about that and be prepared,
10 hopefully, to address that, those are the kinds of
11 things that hopefully you can do right now, right
12 here.

13 You have heard comments of the Chairman.
14 You have had the heads-up since the press releases
15 were provided. We have been working cooperatively
16 with the federal officials that have said, "Listen to
17 Mr. Conners. They are coming to the table. They are
18 trying to do what they can to help the citizens of
19 state of Florida." What we need to hear is what is
20 the industry going to do to help us and that you are
21 concerned about this issue. It's just not a matter of
22 going to 10-digit dialing and we don't care. But we
23 do care. And we're trying to ease the burden. So
24 what can we hear from you, as well as the other
25 speakers, with respect to what you're willing to do

1 without being required, but a voluntary, good-faith
2 basis to ensure competition happens in this state in
3 the way that provides the minimal impact on our
4 customers and provides the best benefits to our
5 customers. What can you say and what will you do?

6 **MR. SELF:** I can't tell you exactly what the
7 company would do.

8 **COMMISSIONER JOHNSON:** When can you tell us
9 that?

10 **MR. SELF:** I think what you need to do, part
11 of the Staff recommendation that said have a meeting
12 of the parties, of the affected industry participants
13 as quickly as possible; and get the engineers, get the
14 right people there so that you can come to -- so you
15 can identify the kinds of solutions and what the
16 parties can do immediately to meet those solutions.

17 **COMMISSIONER JOHNSON:** What kind of time
18 frame are you looking at? Are you saying the industry
19 meeting that occurs this week will be a forum to
20 address this particular -- the one reason why I'm so
21 concerned in that Ms. McKinney just informed us that
22 Mr. Melby called and said, "Oh, we're out of NXXs for
23 305. Forget that. There's nothing left on the table
24 to deal with, Julia. You can go to the FCC with an
25 empty bag." Now, I can't go to the FCC with an empty

1 bag. And I've been trying to work with you, and I've
2 been trying to come up with a process that works for
3 everyone that will provide predictability and some
4 certainty with respect to the industry and to the
5 customers. But we've got to have your help in this.
6 We've got to have a process. I'm concerned that
7 someone declares jeopardy, so certified providers will
8 go out and eat up the numbers while they can before we
9 can come up with a resolution. And that may not be
10 true. I'm not certain if it's true or not. But I do
11 know what is in your control: The numbers you already
12 have.

13 The next request you might make tomorrow.
14 You might ask for as thousand blocks. You might say,
15 "Look, we have some NXXs we're willing to give back,
16 pull back," or whatever you want to call it. That
17 would be, in my mind, a productive dialog and a first
18 step that it could, at least, give the Commissioners
19 some comfort.

20 **MR. SELF:** And there's other things too.
21 First thing, with respect to jeopardy, as they said
22 earlier, when a jeopardy situation is declared, they
23 immediately freeze and immediately begin rationing.
24 And you can look and see that those rationings that
25 occur by NPA code are to some degree tailored based

1 upon the number of NXX codes that remain. So when
2 they declare jeopardy, a carrier can't come in and
3 immediately request a bunch of numbers; that doesn't
4 happen.

5 **COMMISSIONER JOHNSON:** Actually I'm hearing
6 both sides of that. I'm hearing that they can and
7 they cannot, and I'm not sure as to which is which.
8 Last week -- I agree with what you just said. But I
9 have been hearing contradictory information with
10 respect to after jeopardy is declared what companies
11 could get. And, perhaps, Ms. McKinney -- let me
12 clarify that point. Ms. McKinney, do you have any
13 information on that?

14 **MS. MCKINNEY:** That's something I'm also
15 confused about, Commissioner. But last week I know in
16 one of the conversations with somebody from NANPA they
17 said after extraordinary jeopardy then the rationing
18 started. They made -- they differentiated between
19 "jeopardy" and "extraordinary jeopardy." I have not
20 found out any additional information since then.

21 **MR. SELF:** Commissioner Johnson, if you look
22 on the NANPA web site, there's a page for 305, there's
23 a page for 651, there's a page for each of the area
24 codes that's in jeopardy. There's detailed procedures
25 here, including the freeze and how many NXX codes --

1 **COMMISSIONER JOHNSON:** For extraordinary
2 jeopardy.

3 **MS. MCKINNEY:** Yes. Those are extraordinary
4 jeopardy, Commissioner Johnson.

5 **CHAIRMAN GARCIA:** Maybe you can ponder some
6 of the comments. And I hope the other participants
7 will be able to give us some answers to some of the
8 questions Commissioner Johnson asked. Ms. Barone.

9 **MS. BARONE:** Yes, Chairman Johnson (sic)
10 Monica Barone representing Sprint.

11 First, I'd like to thank you for addressing
12 you on this topic that's very important to you, the
13 consumers of Florida and to Sprint as well.

14 I'd like to say at the outset that Sprint,
15 as a national carrier, is intimately aware of the
16 difficulties associated with area code exhausts across
17 the nation and in the state of Florida. While we
18 recognize the difficulty, we respectfully urge you to
19 follow the processes that are in place today.

20 And just as a summary of where we are and
21 what the law says, I'll just give you a brief outline.

22 As you're aware, the FCC has exclusive
23 jurisdiction over numbering issues. But the FCC has
24 delegated some authority to the states. First, states
25 can implement appropriate forms of area code relief.

1 In the Pennsylvania NPA order the FCC delegated
2 additional authority to state commissions to order NXX
3 code rationing only in conjunction with area code
4 relief decision, and only after the industry has been
5 unable to reach consensus.

6 And in response to an earlier question
7 today, I'd like to also point out that the
8 Pennsylvania NPA Order stated that number pooling --
9 I'd like to let you know that -- get back to this --
10 "At this time, however, we decline to delegate to
11 state commissions the authority to order number
12 pooling in view of the activity occurring at the
13 federal level to develop such national standards."

14 Commissioners, I would urge --

15 **COMMISSIONER CLARK:** When was that order
16 issued?

17 **MS. BARONE:** I'm sorry?

18 **COMMISSIONER CLARK:** When was that order
19 issued?

20 **MS. BARONE:** It was ordered September 28th,
21 1998.

22 **COMMISSIONER CLARK:** And do I understand --

23 **CHAIRMAN GARCIA:** That's the Pennsylvania --

24 **MS. BARONE:** Yes, ma'am.

25 **COMMISSIONER CLARK:** Do I understand the FCC

1 saying they are not going to sort of reach their final
2 policy on all of this until 2002?

3 **MS. MCKINNEY:** Correct, Commissioner Clark.

4 **MS. BARONE:** I only point out but they will
5 do that on an interim basis; they will work with you.
6 I'm just laying out the processes for you, as
7 Commissioner Johnson has wanted to go through the
8 process so we can get to a solution. I just wanted to
9 point out what authority has been delegated and what
10 has not.

11 However -- so the first thing that needs to
12 be done is that the industry -- we would encourage the
13 Commission to allow the industry to get together to
14 come to a solution. This has happened in several
15 states around the country. For example, in the
16 Massachusetts case that was cited earlier, the
17 industry did propose a number assignment and
18 conservation measures. And I'd like to let you know
19 that those guidelines were used in Connecticut, New
20 Hampshire and Missouri. And I tell you this to let
21 you know and to assure you that we will work together
22 to come up with a solution.

23 **MS. MCKINNEY:** They are still pending.

24 **COMMISSIONER DEASON:** Are you going to tell
25 us what you think we can do at this point and your --

1 you're telling me that we should encourage industry to
2 get together and reach a consensus as to what is an
3 appropriate solution; is that correct?

4 **MS. BARONE:** Allow the process to work --

5 **COMMISSIONER DEASON:** Is that the only thing
6 in the process we can do is encourage industry to get
7 together?

8 **MS. BARONE:** No, sir. I think that the
9 industry is going to get together. And that the FCC's
10 orders have stated that the state commission --
11 encourage the state commissions to work with the
12 industry to come up with a solution.

13 Then the next step is if we are unable to
14 come up with a solution, then the Commission can
15 petition the FCC for a waiver from the requirements
16 like the California commission did. I don't think
17 that that case is totally like this case. Here we're
18 in the beginning stages. And if we're able to have
19 that opportunity to come up with a solution for you
20 and we're unable to, then the next process is to ask
21 for a waiver from the requirements.

22 **CHAIRMAN GARCIA:** Let me just ask something.
23 And I see the -- one of the members of the Public
24 Counsel staff. I'd like the industry to invite the
25 Public Counsel to be at their meetings. Obviously the

1 public isn't being considered in these changes. Any
2 time you go to 10-digit dialing it seems like a
3 fantasy for you all, but it's quite a difficult
4 thing -- and trust me as someone who had to live
5 through it, it's not an easy -- I mean, apparently,
6 you guys are willing to make decisions that seem to
7 be, to some degree, functional in an engineering
8 standpoint, but the public is not being considered.

9 So I would suggest, since this Commission
10 has to arbitrate in the end your dispute, that the
11 Public Counsel be invited to any of these meetings --
12 to be quite honest one of the groups being
13 inconvenienced is the people of Florida. This
14 Commission can't represent them because we're going to
15 have to decide the issue. I'd request, and I'll ask
16 our Staff to make -- follow up on that, and maybe,
17 obviously, we've got to check with the Public
18 Counsel's Office, but they are willing -- that the
19 industry include the public in these meetings,
20 particularly the Public Counsel's Office, who
21 represents the people of this state in these matters.

22 **MS. BARONE:** Chairman Garcia, I'd also just
23 like to mention that we're concerned. We're concerned
24 that consumers are able to get the numbers they want
25 so they can make the calls and get the services that

1 they want.

2 I do believe that everyone here in the
3 industry is committed to working towards a solution
4 that's best for all concerned, and, of course, that
5 would include customers.

6 So that's my pledge today. I know you would
7 like solutions today. I cannot represent to you what
8 those are today, but I can guarantee that our company
9 will be involved in a solution that's best for all
10 concerned.

11 **COMMISSIONER DEASON:** Ms. Barone, is it
12 possible for the Commission to go ahead and seek a
13 waiver in the event that the industry does not reach a
14 consensus?

15 **MS. BARONE:** I think you probably have a
16 two -- probably -- you can ask what you want. I think
17 you can have a parallel track. I believe that we need
18 to go forward with the processes that the FCC has laid
19 out in the prior orders. But should you want to go
20 ahead and seek a petition, I think you can do that.
21 In the event that the industry is unable to come up
22 with a solution, then you will already be down that
23 road.

24 **COMMISSIONER DEASON:** Thank you.

25 **COMMISSIONER JOHNSON:** So, Ms. Barone, with

1 respect to -- and I concur with the analyses that you
2 just provided, that procedurally we could request to
3 be given the authority to do mandatory pooling,
4 rationing and to require give-back. But at the same
5 time the industry could be working towards other
6 solutions. And at the same time the industry could
7 come forward with a plan for voluntary pooling,
8 rationing and give-back. And that could easily be
9 overlaid if we decided, or if the FCC decided in
10 conjunction with the PSC, that we should have some
11 mandatory authority. Even if you were to go the
12 voluntarily route, that may not be sufficient. I
13 understand that in New York that it's not necessarily
14 working that well; that the incumbent -- I don't want
15 to pick sides -- but that some of the providers have
16 been very good about it. And that is the incumbents
17 have been very good about the pooling and the
18 give-back, but not all of the providers have been as
19 willing to volunteer.

20 So even though I'm suggesting that it would
21 be helpful if you were all to volunteer, that may not
22 be sufficient in that we may need to use a different
23 route to go about getting some additional mandatory
24 authority from the FCC. But I concur that the process
25 would probably require us to seek the waiver as

1 opposed to just --

2 **MS. BARONE:** Certainly. And Staff's
3 recommendation raises several issues. But I think
4 that like it's been mentioned, there should be a
5 process that we go through so that in the end we don't
6 have several parties that are concerned about the end
7 result. And working together towards a solution seems
8 to be the better approach, and the approach that's
9 been endorsed by the FCC, who does have exclusive
10 jurisdiction over numbering issues.

11 **COMMISSIONER JOHNSON:** You might have
12 answered this, Ms. Barone. How soon do you think we
13 could have any information from your company with
14 respect to voluntary pooling, rationing or give-back?

15 **MS. BARONE:** I cannot tell you that. I know
16 we will have representatives in these meetings that
17 will have scheduled. That will be pretty soon.

18 **CHAIRMAN GARCIA:** Ms. Canzano.

19 **MS. McNULTY:** Good morning. I'm Donna
20 Canzano-McNulty now. I'm appearing on behalf of MCI
21 WorldCom.

22 **COMMISSIONER CLARK:** I just want to be
23 clear. Do would we call you Ms. McNulty or do we call
24 you Canzano-McNulty?

25 **MS. McNULTY:** Ms. McNulty.

1 **COMMISSIONER CLARK:** Good. Thank you.

2 **CHAIRMAN GARCIA:** My wife will be sorely
3 disappointed.

4 **COMMISSIONER CLARK:** At some point it just
5 becomes difficult to say.

6 **MS. McNULTY:** It's a pretty long time.

7 **CHAIRMAN GARCIA:** My wife decided to give my
8 name up completely. Go ahead, Ms. McNulty.

9 **MS. McNULTY:** Thank you.

10 **CHAIRMAN GARCIA:** And congratulations.

11 **MS. McNULTY:** Thanks again.

12 MCI WorldCom concurs in and supports the
13 comments that have been made by AT&T and Sprint, and
14 that we are very concerned about this problem and that
15 we do encourage an industry solution to it, especially
16 now that the industry is extremely cognizant of the
17 situation.

18 **CHAIRMAN GARCIA:** Thank you for your
19 brevity.

20 **MR. REHWINKEL:** Charles Rehwinkel on behalf
21 of Sprint as well.

22 I'm only here, really, to answer questions.
23 I concur in the remarks of Ms. Barone and others that
24 have gone before us. We will -- we certainly have
25 gotten the message about how serious the Commissioners

1 take this issue. We believe we have taken this
2 seriously in the past couple of years where it has
3 accelerated in importance. And we will endeavor to
4 get back with the Commission with a firm date on when
5 we can come together with a solution.

6 I would like to reserve the opportunity to
7 address the issue on a state level of the emergency
8 order, the immediate final order. I don't perceive
9 that that needs to be addressed at this point, but I
10 have some legal arguments to make if the Commission
11 wants to seriously consider doing that rather than
12 pursue a federal waiver process.

13 **COMMISSIONER CLARK:** Let me ask a question.
14 That concerns me, too, because I don't recall seeing
15 any explanation of when we can issue a final order on
16 an emergency basis. Did I miss that, Ms. McKinney?
17 Is that what your argument is going to go to, our
18 legal authority to do that?

19 **MR. REHWINKEL:** Yes, Commissioner. The
20 legal authority and whether the facts of this case,
21 the legal standard is enunciated in the case law.

22 **COMMISSIONER CLARK:** Did I miss that?

23 **MS. MCKINNEY:** Commissioner, it's under
24 120 -- I'm looking for the particular --

25 **COMMISSIONER CLARK:** I guess what I was

1 interested in, to preserve the -- is it health, safety
2 and welfare of the people?

3 **MS. MCKINNEY:** Correct.

4 **COMMISSIONER CLARK:** How have you fit that
5 into that -- how does that affect that?

6 **MS. MCKINNEY:** Commissioner, quite frankly,
7 we went to a strict definition of the immediate danger
8 to the public health, safety and welfare. "Immediate"
9 is occurring at once. All of these area codes are
10 exhausting at one time. And because of the unreliable
11 information, it's questionable as to whether 850 is
12 exhausting. So all at one time. "Danger", another
13 word for "danger" is "jeopardy." They have declared
14 jeopardy in three of our area codes. And safety,
15 there's the issue of protection. And being that this
16 is telecommunications, telephones are a necessity.
17 There are statutes that give the Commission authority
18 to actually declare a state of emergency.

19 **COMMISSIONER CLARK:** Let me just ask a
20 question. What case law -- what are the types of
21 things case law has said are eligible for emergency
22 orders?

23 **MS. MCKINNEY:** Commissioner, there's the
24 case where the Commissioner of Agriculture was given
25 the authority to determine that an emergency existed

1 and to issue a declaration of a state of emergency in
2 regards to noticing of immediately readvertising a bid
3 on water filters to be installed on wells
4 containing -- and I cannot pronounce it, I'm not
5 familiar -- but I think its ethylene dibromide.

6 **COMMISSIONER CLARK:** All right.

7 **MS. MCKINNEY:** The statute itself, 252.32,
8 Commissioner, specifically mentions that technological
9 causes can be an emergency. It says "because of the
10 existing and continuing possibility of the occurrence
11 of emergencies and disasters resulting from natural,
12 technological or man-made causes, in order to ensure
13 that preparations of this state will be adequate to
14 deal with reduced vulnerability to, and recover from,
15 such emergency from disaster, to provide for the
16 common defense and to protect the public peace, health
17 and safety, and to preserve the lives and property of
18 people in this state."

19 And our Commission is specifically given
20 jurisdiction under 252.32(b) where it's conferred upon
21 the governing body of each subdivision of the state,
22 the emergency powers provided within, and you have the
23 emergency power --

24 **COMMISSIONER CLARK:** Let me ask you -- I
25 have no doubt that we have the authority. My concern

1 is just whether or not this rises to the level of an
2 emergency as contemplated by the statute. Do you have
3 any other case law besides the agriculture one?

4 **MS. MCKINNEY:** No, Commissioner, I don't.

5 **COMMISSIONER JOHNSON:** You could cite the
6 authority of Chairman Garcia. (Laughter) That this
7 is an emergency.

8 **CHAIRMAN GARCIA:** I generally think every
9 one of these agendas come up with a new emergency.

10 **COMMISSIONER CLARK:** It seems to me that we
11 don't -- one of the things we want to avoid is sort of
12 getting caught up in needlessly focusing on legalities
13 when we should be trying to accomplish -- affect a
14 change that we need as fast as possible.

15 **CHAIRMAN GARCIA:** Mr. Rehwinkel, maybe we
16 can hold your, I'm sure, very thoughtful and detailed
17 legal analysis -- I just state, I guess, for the
18 record, I'd like our Staff to have something in hand
19 when they go up. And it strikes me maybe not
20 declaring an emergency but maybe asking for the waiver
21 authority. Clearly, when I spoke with Ms. Brown, she
22 seemed very willing to work with us. I don't think
23 she wanted to work with me but she seemed very willing
24 to work with this Commission to reach some type of
25 solution. (Laughter)

1 Thank you, Mr. Rehwinkel.

2 MR. GREER: Stan Greer on behalf of
3 BellSouth.

4 Commissioners, I, probably more than
5 anybody, can understand your frustration, having gone
6 through battles on area codes in the past. And I want
7 to focus what I have to say, since I was in the
8 previous battles.

9 Essentially --

10 CHAIRMAN GARCIA: On the side of the people
11 of Florida, Mr. Greer.

12 MR. GREER: Essentially, Commissioners,
13 there's a couple of aspects. I understand your
14 concern with the utilization of the NXXs. The numbers
15 I have seen showed different numbers than what is
16 shown on Page 12, Page 11. I don't want to get into
17 that argument. The numbers are what the numbers are
18 and we can provide that information as we need to. In
19 most proposals, the devil is in the details. And
20 implementing various types of arrangements, such as
21 number pooling, requires various complex technical
22 issues that you do seven-digit translations versus
23 six-digit translations through all switches. And I
24 understand that's the thing that's being looked at at
25 the Federal level. And we're willing to participate

1 and try to provide as much information to the
2 Commission to assist in that discovery process.

3 The other thing that concerned me to some
4 extent was the assignment of telephone numbers in a
5 sequential manner. We currently have tariffs on file
6 that people can ask for telephone numbers, vanity
7 numbers, whatever, and I'm not for sure our systems
8 bring them up in our sequential manner. Not to say
9 that they can't, but I'm not sure they do. I think
10 they bring them up on a random basis.

11 So I would -- my recommendation would be to
12 move cautiously in these kind of areas because they
13 are very detailed and technical in nature, and have
14 probably a lot of flowing through issues as all area
15 code implementation orders do, as you've seen in the
16 past on various alarm issues, dialing issues and those
17 kind of things. That's all I have.

18 **COMMISSIONER JOHNSON:** Mr. Greer, let me ask
19 you a couple of questions.

20 You have participated in these issues as a
21 member of Staff and also served with me as a
22 representative on the North American Numbering
23 Council.

24 With respect to the voluntary pooling and
25 rationing as a first step, I don't know if you're

1 prepared to speak for your company, but could you
2 react to that? And how soon do you think that we can
3 get that process in place?

4 **MR. GREER:** It typically depends on what
5 you're considering pooling and rationing. If you're
6 considering what has happened in the past industry
7 meetings where jeopardy is issued, you know, in order
8 to get to a certain date and we've limited the number
9 of codes that are assigned, that's what I think of
10 when you say "rationing." I think that's a
11 possibility no matter how you go about that. And I
12 think you clearly have the ability to do that.

13 **COMMISSIONER JOHNSON:** How quickly could
14 that occur? I mean, you all are having some industry
15 meetings this week, right?

16 **WITNESS GREER:** Well, you could do that a
17 couple of ways. You could issue an order saying this
18 is the number of codes that's going to be given out
19 for X amount of time to get you to a certain date.
20 That's typically what happens. It's kind of what
21 date -- in normal exhaust periods, what date do you
22 want to get to and then how many codes I've got left
23 and divide that by however many months you have to get
24 to where you've got to get. The codes are there. You
25 can do that kind of rationing process. It's not a

1 difficult thing. I know some of the parties have
2 expressed some concerns about not being able to have
3 codes and that kind of thing. That's an issue that
4 would come up in rationing, depending on how that
5 rationing mechanism was put together.

6 The industry has typically, in the past been
7 very good about coming up with a rationing proposal to
8 get you to whatever resolution you want to get to.

9 Number pooling, as I said, is a different
10 animal. Number pooling is very technical. You've got
11 to have an administrator. You've got to have seven-
12 digit translation if you go down to the 1,000-block
13 level. So it depends on how you're going to try to
14 implement it.

15 The industry has a great deal of folks at
16 the federal level working on number pooling. They
17 have a number pooling -- it's my understanding they
18 have a number pooling committee that's trying to put
19 together a proposal.

20 **COMMISSIONER JOHNSON:** Number pooling is --
21 mandatory number pooling is occurring in Illinois, I
22 believe. Do you have any --

23 **MR. GREER:** It depends on what they are
24 considering number pooling. I'm not for sure. I know
25 there are a couple of states there are doing things

1 with it.

2 **COMMISSIONER DEASON:** I understand for
3 number pooling you also have to have number
4 portability.

5 **MR. GREER:** Yes.

6 **COMMISSIONER JOHNSON:** And let me just kind
7 of better understand the 305 area code. Do you all
8 have number portability capability throughout the 305
9 region, that is BellSouth?

10 **MR. GREER:** I think that number portability
11 has been implemented in the Miami MSA and the
12 Fort Lauderdale MSA and actually even the West Palm
13 MSA, I believe. Now, the problem I expect is that
14 that does not include Monroe County.

15 **COMMISSIONER JOHNSON:** Could you find out
16 for us? Because even if we wanted to go to pooling, I
17 understand because of some technical constraints, if
18 you don't have the number pooling -- number
19 portability process in place, then you can't
20 technically pool. Could you find out --

21 **MR. GREER:** Sure.

22 **COMMISSIONER JOHNSON:** -- so that we can
23 make sure, as we go towards a solution, if there's
24 something there that we can deal with expeditiously or
25 if there's just a technical problem that we can't get

1 around.

2 **MR. GREER:** Sure. No problem.

3 **COMMISSIONER JACOBS:** I have a brief
4 question of Staff.

5 Do we know -- have any information on the
6 length of time -- once a block of numbers are
7 assigned, I'm hearing percentages of those numbers
8 that are not used. Do we have any information as to
9 how long that situation exists? In other words, is
10 that a short duration? Or once these numbers are
11 assigned, they sit there for some extended period of
12 time not being used?

13 **MR. ILERI:** Commissioners, we know it's
14 between six to 18 months. And we have some data from
15 the North American Numbering Planning Administration.
16 And regarding 954 area code, they have told us that
17 there's 11 months for exhaustion; for 561, 15 months;
18 and for 941 area code seven months.

19 **COMMISSIONER KIESLING:** Let me make sure you
20 understand my question. What I'm saying is those
21 exhaustion dates are indicative of -- of the rate of
22 allocating of those NXXs; is that correct?

23 **MR. ILERI:** That's correct.

24 **COMMISSIONER JACOBS:** What I'm saying is
25 once they have been allocated, do we know -- and I'm

1 hearing that there's a substantial percentage of them
2 that once allocated are not actually used, they are
3 sitting under some company. Do we have any idea how
4 long that circumstance exists? In other words, once a
5 company has applied for 10,000, do we know how long
6 that company sits on them without using them?

7 **MS. MCKINNEY:** Commissioner, there is a
8 guideline for that, and I cannot remember off the top
9 of my head, but I'm thinking it's 18 months, and it
10 automatically goes back, but I cannot remember.

11 There is a time limit, and Staff will get
12 back to you about that, in which the numbers can sit
13 there before they have to go back.

14 **MR. SELF:** Commissioner Jacobs, if I can
15 also add, that in order to get the assignment in the
16 first place, you have to demonstrate certain facts
17 have been met in terms of actually needing the code.
18 So you can't just go out and say, "Give me five codes"
19 and warehouse them.

20 **COMMISSIONER JACOBS:** So then why -- anybody
21 in the industry can answer this for me -- how do we
22 get to the situation we have 60-plus percent unused?

23 **MR. SELF:** One of the issues you have to
24 keep in mind is the recycle time to telephone numbers.
25 For example, if you have a customer that discontinues

1 service, how long the carrier holds that number before
2 it's reassigned to a new customer will affect some of
3 these percentages. I don't know how significantly but
4 I know that's one of the factors that shows up in
5 terms of the number utilization.

6 **MR. REHWINKEL:** Commissioner Jacobs, in 941,
7 Sprint's utilization percentage is 66%. In 407 it's
8 63%. So I think it depends a lot on the type of
9 carrier that you have out there. And I think you
10 heard about just to serve certain areas you need to
11 put a minimum of one code at each rate center. And
12 new entrants tend to use more codes that are
13 underutilized, for lack of a better term.

14 So it's hard for me to say what's going on
15 with other companies. But our utilization is up.
16 We're in a normal range where you would expect an
17 ILEC to be.

18 **COMMISSIONER JACOBS:** One of the real
19 concerns I have is -- and I think Chairman Garcia
20 touched on it earlier -- whatever rationing we
21 undertake has to be competitively neutral. And I
22 don't understand yet that what you basically -- what
23 you just described is that they are obviously
24 different strategies out there about the use of these
25 numbers. And I'd be real concerned, as we enter into

1 any process, to look at this; that I understand the
2 impact it's going to have across the waterfront. And
3 particularly I want to understand to what extent there
4 are companies out there whose percentages are high for
5 a period of time. Because in my mind that gives me
6 some indications.

7 **MS. MCKINNEY:** Commissioner Jacobs, the
8 information that you requested, under current
9 industrial guidelines, central office codes are to be
10 returned to the code administrator if the NXX is no
11 longer needed or is not activated within six months of
12 assignment. The guidelines also allow NXX codes to be
13 reserved up to 18 months, with possible extensions for
14 another six months. And if there's not compliance,
15 then it's to be referred to the industry numbering
16 committee. And if a consensus is not reached, the
17 matter is to be referred to the appropriate regulatory
18 body. And the cases were all questioning whether
19 people question that or actually check and see whether
20 this is in place. Those are what the guidelines
21 state.

22 **COMMISSIONER JACOBS:** Do we know if in a --
23 if the Numbering Council is scrutinizing and enforcing
24 that?

25 **MS. MCKINNEY:** I'm not aware of that,

1 Commissioner Jacobs.

2 **COMMISSIONER JACOBS:** Okay.

3 **MS. SIMMONS:** Commissioner Jacobs, let me
4 mention that -- and this follows on what was being
5 discussed, but certainly an entrant, the way the
6 system works, if they want to operate in a area, they
7 would need a code in each rate center. And I just
8 think it's important to acknowledge that once an
9 entrant has a code in a particular rate center, it is
10 quite conceivable that that code would last a long
11 time, you know, depending on the scope of the
12 entrant's operation. So it is not unusual to have a
13 very low utilization of the code in terms of the
14 percentage of telephone numbers actually being used.

15 **COMMISSIONER JACOBS:** Of the 10,000 block.

16 **MS. SIMMONS:** Yes. Exactly.

17 **COMMISSIONER JACOBS:** And there's a
18 trade-off there in my mind. Because if it turns out
19 that that company can get a 10,000 block and it lasts
20 forever, what are we saying in terms of the efficiency
21 of the allocation process, okay? I don't know that we
22 want to restrict that, but I think that it ought to be
23 a point of discussion. When we engage in rationing,
24 we ought to understand the impact. That's happening
25 in that scenario. And we ought to understand the

1 impact of what we do on those companies, is what I'm

2 --

3 MS. SIMMONS: I would say the system, the
4 way it's been set up -- and it's becoming more and
5 more apparent as we have more competing firms, but
6 it's inherently inefficient because we're doling out
7 numbers in 10,000 blocks because a provider gets an
8 entire prefix at a time.

9 One of the things I wanted to mention,
10 obviously there are a lot of different considerations
11 in terms of what action you take today, but one thing
12 I wanted to encourage you to give serious
13 consideration to is this idea of requiring the code
14 holder to issue numbers consecutively, starting with
15 the lowest available number. I know Mr. Greer
16 mentioned some concerns about that, but I think -- I
17 would urge you to consider at least ordering that on a
18 PAA basis. I think it's important in order to set the
19 stage for number pooling later, you know, and
20 certainly that's the direction I think we're headed.
21 I think it's important to try to ensure that we don't
22 end up with having an entire block of 10,000 numbers
23 contaminated because we have a few assigned in the
24 1,000 block, a few assigned in the 2,000 block, a few
25 in the 7,000 block.

1 Anything we could do right now to ensure
2 that the numbers issued in a prefix are consolidated
3 and concentrated in a particular area I think would
4 help. And that was really the basis for the pieces of
5 the Staff's recommendation to require numbers to be
6 issued consecutively, starting with the lowest
7 available number.

8 I grant you, you know, Mr. Greer indicates
9 there may be implementation problems. There may be.
10 I think, though, that something, perhaps, would be
11 worthy of trying to get going down that road and just
12 see what is involved.

13 **COMMISSIONER JOHNSON:** But that's not
14 something that requires FCC authority, is it, to
15 require them to issue numbers consecutively?

16 **MS. SIMMONS:** I'll defer a little bit here
17 for my legal counsel. But I believe the Commission
18 has more sounder legal basis for requiring this of the
19 code holders and I'll let Ms. McKinney jump in.

20 **MS. MCKINNEY:** None of the cases in which
21 Staff researched said a state commission could not
22 order sequentially.

23 And just one more fact to add to what
24 Ms. Simmons just said. A perfect example,
25 Commissioners, is a carrier in Jacksonville, 904, has

1 30 NXXs; that's 30,000 numbers. That customer only
2 has --

3 **CHAIRMAN GARCIA:** No. That's 300 --

4 **MS. MCKINNEY:** Excuse me, yes. I'm sorry,
5 Commissioner Garcia. But that carrier only has 400
6 customers. So that's 29,000-and-some-odd numbers that
7 are just out there. And I just wanted to show it to
8 you as an example as to why Staff was so concerned.

9 **MR. ILERI:** I'd like to give you another
10 example. Like in the 941 area code, we're conducting
11 a survey on the Docket 981444 on the number
12 utilization --

13 **CHAIRMAN GARCIA:** That's the --

14 **MR. ILERI:** -- number conservation measure.
15 And we have a carrier out there with 20 NXXs that has
16 only 14 numbers assigned. So we have --

17 **CHAIRMAN GARCIA:** They have 20 NXXs, so they
18 have 200,000 numbers.

19 **MR. ILERI:** That's correct.

20 **MR. GREER:** Commissioners, my only concern
21 was the fact that it was a final order versus a PAA.

22 **CHAIRMAN GARCIA:** We'll probably get all the
23 pizza joints come in and argue about consecutive
24 number distribution.

25 **MR. ILERI:** I'd like to make one more

1 comment on the numbers that we have.

2 California currently has 23 area codes and
3 Florida has 17. California has a 23 million
4 population, which is double the amount that we have,
5 and we have almost the same number of area codes. So
6 the Floridians will need an explanation on that.

7 **MS. MCKINNEY:** And that was part of the
8 reason why California was given their jurisdiction to
9 go ahead and do it before they actually petitioned the
10 waiver for the FCC because of those extenuating
11 circumstances and the number of area codes they had
12 and the number of area codes they had in jeopardy,
13 which is just like the Florida situation.

14 **CHAIRMAN GARCIA:** To some degree we, because
15 we followed the rules, because we have been cautious,
16 because we've relied on the information that's been
17 given to us by the administrator, we find ourselves in
18 this position. I mean, that's a stark comparison:
19 That California has twice as many people and yet only
20 has a few more area codes than with we have.

21 Anyway, Commissioners, I guess we can open
22 it up for questions.

23 **COMMISSIONER CLARK:** I have a number of
24 questions just so I understand it. What is the
25 difference between "jeopardy" and "extraordinary

1 jeopardy?" Did you explain that and I just didn't
2 understand it?

3 **MS. McKINNEY:** I attempted to explain it,
4 Commissioner Clark.

5 I was confused about that myself last week.
6 And the way it was explained to me is that
7 extraordinary jeopardy is what the letter is that they
8 actually issue to the commissions, because it's only
9 at the point of extraordinary jeopardy that they can
10 start their rationing procedures. So it really
11 doesn't help for them --

12 **COMMISSIONER CLARK:** Who starts the
13 rationing procedures?

14 **MS. McKINNEY:** The industry has the meeting
15 and gets together and they make the consensus.

16 **COMMISSIONER CLARK:** And they send us a
17 letter and tell us there's extraordinary jeopardy so
18 they are going to ration.

19 **MS. McKINNEY:** Correct. And they meet with
20 the industry. Our meetings are set for tomorrow and
21 the 6th for the area codes that we're talking about
22 today.

23 **COMMISSIONER CLARK:** Okay. Jeopardy is
24 what?

25 **MS. McKINNEY:** Jeopardy is prior to that.

1 So many months beforehand. But because they can't
2 actually do anything and ration, they don't normally
3 declare jeopardy.

4 **COMMISSIONER CLARK:** What's the difference
5 between that and notifying us of an exhaust?

6 **MR. ILERI:** The way that I know,
7 Commissioner Clark, is that if they have only a
8 hundred NXXs left in a area code, then they declare
9 extraordinary jeopardy.

10 **COMMISSIONER CLARK:** Okay.

11 **MR. ILERI:** That is limited distribution of
12 NXXs per month.

13 **COMMISSIONER CLARK:** All right. What's
14 jeopardy?

15 **MR. ILERI:** They do that one up two, three
16 years.

17 **COMMISSIONER CLARK:** They declare jeopardy
18 at three years? If it's going to run out within three
19 years?

20 **MR. ILERI:** If it's going to be premature
21 exhaustion of an area code compared to what was set,
22 then they declare the jeopardy at that time.

23 **MS. MCKINNEY:** And it's supposed to allow
24 state commissions the opportunity to actually go
25 through the process so we wouldn't be crunched like we

1 are with 941.

2 COMMISSIONER CLARK: What is the time frame
3 for notifying us of exhaust?

4 MR. CONNERS: This is Ron Conner. Could I
5 comment on that, please?

6 CHAIRMAN GARCIA: Go ahead, Mr. Connors.

7 MR. CONNERS: I think I might be able to
8 clarify things, because there's been a lot of
9 confusion about the terminology. Let me try to
10 simplify.

11 There are two steps here. The first step is
12 when we declare jeopardy, as we have in these NPAs.
13 And at that point we go into interim procedures. And
14 under the interim procedures in most of these NPAs
15 we've now limited assignments to three per month. And
16 that's the interim procedure. Now, we will next,
17 after the industry meets, we'll implement procedures
18 as defined by the industry. And so those are the two
19 stages that you need to worry about.

20 I'd like to defocus this discussion of
21 what's extraordinary versus regular jeopardy because I
22 think that doesn't really lead us anywhere.

23 So we're in the interim step right now. And
24 once the industry has met and agreed on regular
25 jeopardy procedures, which some people would call

1 extraordinary jeopardy procedures, we'll go with
2 those. I hope that helps clarify.

3 **COMMISSIONER JOHNSON:** No.

4 **COMMISSIONER CLARK:** I'm not alone,
5 Mr. Conners, in saying that that didn't clarify it at
6 all.

7 **MS. MCKINNEY:** And, Commissioner, that's the
8 problem that we have been having throughout this
9 process, quite frankly.

10 **COMMISSIONER CLARK:** Well, you know, maybe
11 it's beyond -- we don't need to get into what is
12 jeopardy, what is extraordinary jeopardy and what is
13 just exhaust. Let me just ask a question with respect
14 to what is rationing, what's lottery and what's
15 pooling?

16 **MR. CONNERS:** This is Ron Conners. Would
17 you like me take an stab at that one?

18 **CHAIRMAN GARCIA:** Let's see if you hit this
19 one, Mr. Conners. Go ahead. I need you to speak up a
20 little bit louder because we're having problems.

21 **MR. CONNERS:** Okay. Does that help?

22 **CHAIRMAN GARCIA:** Yes.

23 **MR. CONNERS:** All right. Let me take
24 rationing first. Rationing is the idea that we will
25 restrict the number of codes assigned in a given

1 period; typically a month is the time frame chosen.

2 COMMISSIONER CLARK: You need to speak up.
3 You keep fading out.

4 MR. CONNERS: Rationing is the process of
5 restricting the number of assignments per time period,
6 typically per month, to a lower level. For example,
7 right now in 941 we've restricted the assignments to
8 three per month. Okay. That's rationing.

9 COMMISSIONER CLARK: Let me just ask you,
10 when you say three per month, you mean that's three
11 10,000 block groups per month?

12 MR. CONNERS: That is correct. Now, lottery
13 is the concept that makes it competitively neutral.
14 So the applicants who will receive the three blocks
15 per month, the three 10,000 blocks per month, are
16 chosen by lottery from the applicants who have applied
17 for that particular month.

18 COMMISSIONER CLARK: Do you have to have a
19 lottery in conjunction with the rationing?

20 MR. CONNERS: Normally we do. Normally
21 that's the way in which the applicants who will
22 receive assignments are chosen.

23 COMMISSIONER CLARK: Okay. Thank you. What
24 about pooling?

25 MR. CONNERS: Pooling, as I think Stan Greer

1 said, is something completely different. There you
2 change the paradigm and instead of assigning telephone
3 numbers in blocks of 10,000, you've changed the
4 paradigm and assigned them in blocks of 1,000 so that
5 you can use the number supply more efficiently. And
6 as Stan pointed out, this requires a technical base
7 within the network in order to be implemented.

8 **COMMISSIONER CLARK:** Oh. Thank you,
9 Mr. Conners.

10 Let me ask, do we have information about --
11 what do you call them, SMAS -- or whatever has number
12 portability, do we know the extent to which that's
13 been implemented in Florida?

14 **MS. MCKINNEY:** Staff requested the
15 information and it's still coming in. We haven't
16 gotten it all back yet but we did request the
17 information.

18 **COMMISSIONER CLARK:** Mr. Greer, do you have
19 any idea where we are in number portability?

20 **MR. GREER:** Yes. Essentially,
21 Commissioners, the FCC's requirement was to implement
22 number portability in the top hundred MSAs, which in
23 Florida included, if I can remember right, Tampa,
24 Miami, Fort Lauderdale, Jacksonville, and I believe
25 Sarasota and Orlando. Those have been implemented.

1 **COMMISSIONER CLARK:** I guess I'm looking for
2 how close are we to having the whole state there so we
3 could go to pooling?

4 **MR. GREER:** I would have to get you a report
5 on that. I can do that without any problem.

6 **COMMISSIONER DEASON:** Do you have any
7 information -- at least it was something we were going
8 over a little earlier, Stan, and I received some
9 information from NANPA, if we were to take one step at
10 a time, and with respect to 305. I guess that would
11 have been -- because of Miami I guess that would have
12 been one of the major metropolitan areas. And it was
13 my understanding that 95% of the central office codes
14 are available for number portability in the 305 area.

15 **MR. GREER:** That's my understanding is all
16 offices in the Miami MSA, which I think includes all
17 of Dade -- I don't know that it includes Monroe and
18 that's what I was going to check. That may be the 5%.
19 I know they have implemented number portability in the
20 Miami MSA.

21 **COMMISSIONER JOHNSON:** How is that
22 impacted -- just to follow up on one of Commissioner
23 Clark's questions. Now, the CLECs still have to
24 request that their area be made portable, or is there
25 an additional step that a CLEC would have to request?

1 **MR. GREER:** There can be a request for
2 additional offices that are not within the 100 MSAs.

3 **COMMISSIONER JOHNSON:** Okay.

4 **MR. GREER:** Can request those. And I'm not
5 for sure whether we have implemented things without a
6 request or not. I'd have to check and see.

7 **COMMISSIONER JOHNSON:** Thank you.

8 **MR. SELF:** Commissioner Johnson, you should
9 also know that there's not number portability for
10 wireless carriers yet.

11 **COMMISSIONER JOHNSON:** Right. So I
12 understand that even in the areas where pooling has
13 been made mandatory, like Illinois, that the wireless,
14 because you don't have number portability yet, you're
15 still receiving numbers in 10,000 blocks.

16 **MR. SELF:** That's correct. And they
17 generally tend to use them up much faster than a lot
18 of the CLECs are using them.

19 **COMMISSIONER JOHNSON:** I also understood
20 that there's nowhere in the nation where -- because of
21 the number portability problem -- cellulars were being
22 restricted to the 1,000 -- that they were not being
23 restricted to 1,000 because of the number portability
24 problem.

25 **MR. SELF:** That's my understanding.

1 **CHAIRMAN GARCIA:** Okay. Commissioners, I
2 guess if there's not any more questions. If not,
3 there are --

4 **COMMISSIONER DEASON:** I move that we issue a
5 PAA requiring sequential number utilization; that we
6 do not issue the emergency final orders, but that we
7 do initiate -- concurrent with the industry meeting,
8 that we go ahead and initiate a waiver request for the
9 FCC.

10 **CHAIRMAN GARCIA:** Okay. Is there a second?

11 **COMMISSIONER JOHNSON:** I second that motion.
12 And let me make sure I understand. The waiver request
13 would be to allow us to do the things that Staff
14 suggested in the recommendation?

15 **CHAIRMAN GARCIA:** Request of the FCC.

16 Commissioners, in order to give Staff
17 maximum flexibility, should we add -- I don't remember
18 if it was discussed that Staff also explore the option
19 of pooling when it discusses the waiver. Is that in
20 it?

21 **MS. MCKINNEY:** That's in there.

22 **COMMISSIONER JOHNSON:** You all have pooling,
23 rationing, lottery; you have everything.

24 **COMMISSIONER CLARK:** I need to have the
25 motion restated.

1 **COMMISSIONER DEASON:** Essentially, that we
2 would issue a PAA order requiring sequential number
3 utilization. I believe Ms. Simmons indicated that
4 that was preferential, and I think at least BellSouth
5 indicated they didn't have a problem as long as it's a
6 PAA order. The other parties really didn't address
7 it. And that we would not issue the final emergency
8 order as recommended by Staff, but that we instruct
9 Staff to go ahead, concurrent with the industry
10 meetings that are going to be taking place shortly,
11 that we go ahead and initiate the request with the FCC
12 to have a waiver so that we can explore, and if
13 necessary, utilize the measures which Staff outlines
14 in their recommendation in case there is not a
15 consensus reached as a result of the industry
16 meetings.

17 **COMMISSIONER CLARK:** Okay. I guess I have
18 just one question on doing this PAA. Do we have a
19 near time for a hearing, and is there any advantage to
20 setting it for hearing? Can you speed up the process
21 if you set up the hearing now and at the end of the
22 hearing we can issue a bench decision? My only
23 concern is how do we get there fastest? And I think
24 you have to allow 21 days plus mailing to deal with a
25 PAA.

1 **MS. MCKINNEY:** Yes, Commissioner.

2 **COMMISSIONER CLARK:** And it seems to me we
3 might be able to give notice of a hearing more quickly
4 and schedule that hearing. As far as I'm concerned it
5 could be after agenda, and --

6 **COMMISSIONER DEASON:** I will accept that as
7 a friendly amendment, that we just go straight to
8 hearing.

9 **CHAIRMAN GARCIA:** Staff, get together with
10 my office and we'll set it as soon as is possible.

11 **COMMISSIONER CLARK:** And I guess -- I think
12 we should do one or the other but Staff needs to
13 determine what is fastest.

14 **CHAIRMAN GARCIA:** Okay.

15 **MS. SIMMONS:** My only comment was -- based
16 on what I heard today, I don't know if it's
17 contentious or not. I really couldn't tell.

18 **CHAIRMAN GARCIA:** I'm sure the industry is
19 going to work with us.

20 **COMMISSIONER JACOBS:** Do we have any
21 provisions or should we have any provisions in 305?
22 Do we need to know what --

23 **CHAIRMAN GARCIA:** Staff was very specific in
24 305 in the recommendation.

25 **MR. ILERI:** Commissioners, I know that

1 Mr. Conners was mentioning that there are 12 NXXs left
2 from the 305 Dade County, and I would suggest that we
3 use those NXXs in the Florida Keys.

4 **COMMISSIONER CLARK:** Okay.

5 **MR. ILERI:** 1 NXX per year --

6 **CHAIRMAN GARCIA:** Mr. Conners seemed to
7 allude to the fact that we had authority. He said we
8 would have gotten it right had we included in our
9 final order some issue about how these numbers were
10 going to be given. Commissioner Deason, do you sort
11 of want to add --

12 **COMMISSIONER DEASON:** Well, I thought
13 Mr. Conners indicated there was some type of -- if my
14 notes are correct, and I'm sure he can clarify for
15 us -- there was some type of freeze in place. That
16 there's 12 additional codes have been set aside for
17 the Keys and that there was some type of a freeze or
18 some type of measures that were going to be taken to
19 throttle down the demand. So, Mr. Conners, can you
20 amplify that for us, please?

21 **MR. CONNERS:** Sure. I would be happy to.

22 There are 12 codes set aside at this point
23 remaining and we have set those aside for use in the
24 Keys. We currently have a freeze on. We're not
25 assigning any codes out of those 12 pending an

1 industry meeting at which the industry will come to
2 consensus on a recommendation as to how those codes
3 would be used. My guess is, if I think ahead, that
4 the industry will probably concur that those codes
5 should be used in the Keys and will set a rationing
6 and a lottery arrangement in order to use those codes
7 as effectively as possible. Other than that, I don't
8 want to prejudge how the meeting is going to come out.

9 If I can make, though, one further comment.
10 My comment on the ability of the Commission to
11 order -- or what was interpreted as the ability of the
12 Commission to order that, I didn't intend my comment
13 to imply whether you did or did not have that ability
14 to order that particular type of arrangement. My
15 comment was only had there been something that
16 restricted the flow of codes, that we would not be in
17 the situation we were in today. I didn't mean to
18 imply that you either had or had not the ability to
19 order that.

20 **COMMISSIONER JACOBS:** It sounds, then, that
21 that meeting, the industry meeting, could result in
22 some of those NXXs being assigned outside of the Keys?

23 **MR. CONNERS:** It, to me, is unlikely that
24 that would happen. I just don't want to prejudge at
25 this point what will occur. But I think it's highly

1 unlikely that the industry would concur at this point
2 knowing the sense of the previous Commission order,
3 that those codes should be used outside the Keys.

4 **CHAIRMAN GARCIA:** Mr. Conners, just so I can
5 understand it in simple terms, there's a freeze in
6 place now in the Florida Keys.

7 **MR. CONNERS:** That's correct.

8 **CHAIRMAN GARCIA:** Very good. We have a
9 motion and a second. The only thing I request is if
10 it's all right with the movement, that we also send a
11 letter -- Staff draft a letter to the Public Counsel's
12 Office asking for assistance in this matter, if they
13 will participate with the industry meetings, and we
14 ask the parties to keep them aware of that.

15 **COMMISSIONER DEASON:** I certainly have no
16 objection.

17 **CHAIRMAN GARCIA:** Very good. There's a
18 motion and a second, all in favor signify by saying is
19 "aye." Aye.

20 **COMMISSIONER JOHNSON:** Aye.

21 **COMMISSIONER CLARK:** Aye.

22 **COMMISSIONER JACOBS:** Aye.

23 **COMMISSIONER DEASON:** Aye.

24 **CHAIRMAN GARCIA:** All those opposed? (No
25 response.) Show it passes unanimously.

1 Commissioners, we're going to take until
2 11:45.

3 **COMMISSIONER JOHNSON:** Let me raise one
4 issue with respect to there's a meeting the day
5 after -- when is the meeting in D.C.?

6 **MS. MCKINNEY:** April 5th.

7 **COMMISSIONER JOHNSON:** It would be -- and
8 just to get some feel from Staff, the FCC, they have
9 indicated a willingness to -- as soon as we get a
10 petition prepared -- to get that up to them and they
11 will be ready to work that through the system. How
12 soon do we believe we'll be able to have that petition
13 ready?

14 **MS. MCKINNEY:** Soon as possible.

15 **COMMISSIONER JOHNSON:** Soon? Very soon? I
16 think it would be helpful if we could hand-walk that
17 up to the FCC and walk through our request with Yog
18 and the other members of the FCC that are working on
19 this.

20 **CHAIRMAN GARCIA:** If Staff can get it ready,
21 I'll sign it as early as this afternoon.

22 **COMMISSIONER JOHNSON:** And the other issue,
23 with respect to the companies and what they are going
24 to do, there's one point of confusion for me. You all
25 are going to have a meeting to determine solutions for

1 which area code?

2 **MS. MCKINNEY:** 941, 954, and 561.

3 **COMMISSIONER JOHNSON:** Do we have a process
4 whereby -- I'd like for the industry to be able to
5 bring forth some proposal to us in the voluntary
6 nature. What can you do in the interim? Certainly
7 we're going to be trying to seek something of a
8 mandatory nature. But in the interim, I think to the
9 extent that you all can deal with voluntary pooling,
10 rationing, the lottery system and those kind of issues
11 without the need to go to hearing, that that would
12 help move the process along.

13 **COMMISSIONER DEASON:** And voluntary
14 give-back.

15 **COMMISSIONER JOHNSON:** Oh, give-back. I
16 forgot give-back. Voluntary give-back. Mr. Chairman,
17 if you could work with them and if they could present
18 something back to us on that I think that would be
19 helpful.

20 **CHAIRMAN GARCIA:** If the Commission doesn't
21 disagree, I would delegate that to you and you can try
22 to work with the industry on some of those issues
23 since you know them a little bit better than myself.
24 But that's a yes, I'm always willing to participate
25 when you take charge.

1 That's it. Mr. Self, if you have something,
2 you can present it to Commissioner Johnson.

3 We're going to take until noon. You always
4 complain there's not enough food at Eatz. Now you get
5 first in line. We will start back at 12 o'clock.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 STATE OF FLORIDA)
2 COUNTY OF LEON)

CERTIFICATE OF REPORTER

3 I, JOY KELLY, CSR, RPR, Chief, Bureau of
4 Reporting, Official Commission Reporter,

5 DO HEREBY CERTIFY that the Agenda Item 4A**
6 Docket No. 990373-TP was heard by the Florida Public
7 Service Commission at the time and place herein
8 stated; it is further

9 CERTIFIED that I stenographically reported
10 the said proceedings; that the same has been
11 transcribed under my direct supervision; and that this
12 transcript, consisting of 87 pages, constitutes a true
13 transcription of my notes of said proceedings.

14 DATED this 31st day of March, 1999.

11

12

13

14

15

16

17

18

19

20

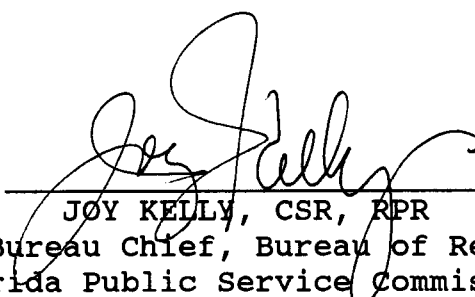
21

22

23

24

25


JOY KELLY, CSR, RPR
FPSC Bureau Chief, Bureau of Reporting
Florida Public Service Commission
(850) 413-6732

&	63% 36/8, 64/8 651 43/23 66% 64/7 6th 3/15, 71/21	applied 63/5, 75/16 appoint 32/18 appreciate 38/5, 38/23 appreciative 8/13
& 24/2		approach 9/25, 10/2, 10/10, 11/12, 14/6, 16/15, 51/8 appropriate 14/11, 14/20, 23/21, 25/7, 25/8, 44/25, 47/3, 65/17
*	7	approval 31/8 approved 26/1 April 12/6, 12/10, 13/22, 85/6 arbitrate 48/10
* 3/3	7,000 67/25	area 1/5, 3/10, 3/12, 3/19, 3/24, 3/25, 4/7, 4/11, 4/15, 6/10, 8/8, 8/18, 12/20, 15/12, 15/22, 15/24, 17/3, 17/18, 17/23, 20/3, 23/2, 25/15, 26/8, 26/12, 28/4, 30/12, 30/19, 32/4, 32/6, 35/1, 43/23, 44/16, 44/25, 45/3, 54/9, 54/14, 57/6, 58/14, 61/7, 62/16, 62/18, 66/6, 68/3, 69/10, 70/2, 70/5, 70/11, 70/12, 70/20, 71/21, 72/8, 72/21, 77/14, 77/24, 86/1
1	8	areas 6/1, 14/21, 58/12, 64/10, 77/12, 78/12 argue 69/23 argument 53/17, 57/17 arguments 53/10 arm 35/9 arrangement 25/25, 83/6, 83/14 arrangements 57/20 aspect 37/8 aspects 37/10, 57/13 assign 19/25 assigned 16/25, 19/8, 59/9, 62/7, 62/11, 67/23, 67/24, 69/16, 74/25, 76/4, 83/22 assigning 19/6, 76/2, 82/25 assignment 15/11, 18/18, 19/4, 38/18, 46/17, 58/4, 63/15, 65/12 assignments 18/16, 18/22, 18/23, 24/24, 73/15, 75/5, 75/7, 75/22 assist 7/24, 16/14, 58/2 assistance 84/12 associated 44/16 assure 15/20, 46/21 AT&T 2/7, 24/3, 24/7, 24/9, 24/10, 24/17, 24/18, 24/22, 28/2, 52/13 attempt 19/17 attempted 71/3 attempts 38/16 attention 3/9, 13/2, 13/15 attorney 22/1 August 30/11 authority 6/16, 9/24, 10/4, 10/12, 10/24, 11/1, 11/25, 21/13, 21/15, 21/20, 22/19, 22/25, 23/1, 23/10, 25/23, 30/3, 30/12, 30/14, 30/18, 30/23, 30/24, 31/14, 31/15, 34/17, 39/18, 39/25, 44/24, 45/2, 45/11, 46/9, 50/3, 50/11, 50/24, 53/18, 53/20, 54/17, 54/25, 55/25, 56/6, 56/21, 68/14, 82/7 authorized 26/22 automatically 63/10 availability 25/2 available 5/9, 7/2, 7/14, 7/21, 8/3, 19/1, 38/21, 67/15, 68/7, 77/14 avoid 56/11 aye 84/19, 84/20, 84/21, 84/22, 84/23
1 8/8, 82/5 1,000 21/10, 67/24, 76/4, 78/22, 78/23 1,000-block 40/7, 60/12 1.2 18/11 10 28/23, 36/15 10,000 17/1, 20/24, 21/5, 21/8, 63/5, 66/15, 66/19, 67/7, 67/22, 75/11, 75/15, 76/3, 78/15 10-digit 17/21, 27/24, 40/22, 48/2 100 78/2 11 57/16, 62/17 11:30 1/15 11:45 85/2 12 3/13, 5/21, 5/24, 17/16, 18/25, 19/5, 34/4, 57/16, 82/1, 82/16, 82/22, 82/25, 87/5 120 53/24 14 69/16 148 1/16 15 62/17 15-minute 28/22 15th 3/10 16th 12/6 17 70/3 17th 12/9 18 62/14, 63/9, 65/13 1996 30/11, 31/9 1998 3/15, 11/24, 11/25, 22/24, 45/21 1999 1/13, 3/10, 12/5, 12/9, 12/10 1st 31/16	850 54/11 87 88/8 8th 30/11	argued 69/23 argument 53/17, 57/17 arguments 53/10 arm 35/9 arrangement 25/25, 83/6, 83/14 arrangements 57/20 aspect 37/8 aspects 37/10, 57/13 assign 19/25 assigned 16/25, 19/8, 59/9, 62/7, 62/11, 67/23, 67/24, 69/16, 74/25, 76/4, 83/22 assigning 19/6, 76/2, 82/25 assignment 15/11, 18/18, 19/4, 38/18, 46/17, 58/4, 63/15, 65/12 assignments 18/16, 18/22, 18/23, 24/24, 73/15, 75/5, 75/7, 75/22 assist 7/24, 16/14, 58/2 assistance 84/12 associated 44/16 assure 15/20, 46/21 AT&T 2/7, 24/3, 24/7, 24/9, 24/10, 24/17, 24/18, 24/22, 28/2, 52/13 attempt 19/17 attempted 71/3 attempts 38/16 attention 3/9, 13/2, 13/15 attorney 22/1 August 30/11 authority 6/16, 9/24, 10/4, 10/12, 10/24, 11/1, 11/25, 21/13, 21/15, 21/20, 22/19, 22/25, 23/1, 23/10, 25/23, 30/3, 30/12, 30/14, 30/18, 30/23, 30/24, 31/14, 31/15, 34/17, 39/18, 39/25, 44/24, 45/2, 45/11, 46/9, 50/3, 50/11, 50/24, 53/18, 53/20, 54/17, 54/25, 55/25, 56/6, 56/21, 68/14, 82/7 authorized 26/22 automatically 63/10 availability 25/2 available 5/9, 7/2, 7/14, 7/21, 8/3, 19/1, 38/21, 67/15, 68/7, 77/14 avoid 56/11 aye 84/19, 84/20, 84/21, 84/22, 84/23
2	A	B
2 25/6 2,000 67/24 20 18/20, 69/15, 69/17 20-code 18/8 200 7/5 200,000 69/18 2000 39/10 2002 46/2 2007 4/1 2009 4/2 2012 29/23 21 80/24 23 70/2, 70/3 252.32 55/7, 55/20 28th 45/20 29,000-and-some-odd 69/6	a.m 1/14, 1/15 ability 59/12, 83/10, 83/11, 83/13, 83/18 accelerated 53/3 accept 81/6 accepted 36/4 access 24/25 accomplish 56/13 acknowledgement 9/16 act 14/5, 20/10, 25/8, 25/13 acted 10/13 acting 13/12 action 4/14, 4/21, 5/2, 5/13, 10/8, 12/22, 22/21, 39/24, 67/11 actions 9/21 activated 65/11 activity 45/12 add 18/24, 63/15, 68/23, 79/17, 82/11 address 8/3, 29/20, 32/9, 40/10, 41/20, 53/7, 80/6 addressed 9/6, 29/19, 53/9 addressing 29/18, 44/11 adequate 55/13 Administer 6/9, 25/19 Administration 15/10, 24/5, 30/15, 62/15 Administrator 7/11, 18/4, 28/25, 30/5, 33/19, 38/17, 60/11, 65/10, 70/17 advantage 80/19 adverse 24/16 advice 8/20 affect 54/5, 56/13, 64/2 affected 33/12, 41/12 afternoon 85/21 Afterwards 3/21 AGENDA 1/8, 81/5, 88/4 agendas 56/9 agree 8/14, 9/5, 11/22, 12/25, 26/4, 26/5, 33/18, 34/12, 34/23, 43/8 agreed 13/20, 26/6, 26/10, 26/15, 26/16, 28/4, 73/24 agreement 27/14, 27/20, 36/4 agrees 34/16 Agriculture 54/24, 56/3 alarm 29/7, 29/8, 58/16 allocated 62/25, 63/2 allocating 62/22 allocation 18/8, 29/19, 66/21 allow 46/13, 47/4, 65/12, 72/23, 79/13, 80/24 allowed 11/4, 11/5, 23/6, 31/20 allude 82/7 ambit 28/10, 36/21 amendment 81/7 American 6/9, 7/11, 15/9, 22/13, 58/22, 62/15 amount 28/17, 59/19, 70/4 amplify 82/20 amputating 35/9 analyses 50/1 analysis 8/10, 10/10, 56/17 animal 60/10 answer 5/4, 7/12, 9/8, 9/9, 12/11, 14/3, 14/4, 17/6, 22/9, 52/22, 63/21 answered 51/12 answers 9/12, 44/7 apologies 15/13 applicants 75/14, 75/16, 75/21 applications 32/24	ability 59/12, 83/10, 83/11, 83/13, 83/18 accelerated 53/3 accept 81/6 accepted 36/4 access 24/25 accomplish 56/13 acknowledgement 9/16 act 14/5, 20/10, 25/8, 25/13 acted 10/13 acting 13/12 action 4/14, 4/21, 5/2, 5/13, 10/8, 12/22, 22/21, 39/24, 67/11 actions 9/21 activated 65/11 activity 45/12 add 18/24, 63/15, 68/23, 79/17, 82/11 address 8/3, 29/20, 32/9, 40/10, 41/20, 53/7, 80/6 addressed 9/6, 29/19, 53/9 addressing 29/18, 44/11 adequate 55/13 Administer 6/9, 25/19 Administration 15/10, 24/5, 30/15, 62/15 Administrator 7/11, 18/4, 28/25, 30/5, 33/19, 38/17, 60/11, 65/10, 70/17 advantage 80/19 adverse 24/16 advice 8/20 affect 54/5, 56/13, 64/2 affected 33/12, 41/12 afternoon 85/21 Afterwards 3/21 AGENDA 1/8, 81/5, 88/4 agendas 56/9 agree 8/14, 9/5, 11/22, 12/25, 26/4, 26/5, 33/18, 34/12, 34/23, 43/8 agreed 13/20, 26/6, 26/10, 26/15, 26/16, 28/4, 73/24 agreement 27/14, 27/20, 36/4 agrees 34/16 Agriculture 54/24, 56/3 alarm 29/7, 29/8, 58/16 allocated 62/25, 63/2 allocating 62/22 allocation 18/8, 29/19, 66/21 allow 46/13, 47/4, 65/12, 72/23, 79/13, 80/24 allowed 11/4, 11/5, 23/6, 31/20 allude 82/7 ambit 28/10, 36/21 amendment 81/7 American 6/9, 7/11, 15/9, 22/13, 58/22, 62/15 amount 28/17, 59/19, 70/4 amplify 82/20 amputating 35/9 analyses 50/1 analysis 8/10, 10/10, 56/17 animal 60/10 answer 5/4, 7/12, 9/8, 9/9, 12/11, 14/3, 14/4, 17/6, 22/9, 52/22, 63/21 answered 51/12 answers 9/12, 44/7 apologies 15/13 applicants 75/14, 75/16, 75/21 applications 32/24
3	B	bag 41/25, 42/1 BARONE 2/9, 44/10 Barry 7/20 base 76/6 based 4/23, 8/16, 18/8, 24/19, 42/25, 81/15 basis 13/17, 41/2, 46/5, 53/16, 58/10, 67/18, 68/4, 68/18 battles 57/6, 57/8 beeper 36/3, 36/20 BellSouth 2/11, 32/20, 57/3, 61/9, 80/4 bench 80/22 benefits 41/4 Betty 1/16 bid 55/2 big 23/9 bigger 21/11 Bishop 7/21 bit 15/5, 18/1, 68/16, 74/20, 86/23 block 20/24, 21/1, 62/6, 66/15, 66/19, 67/22, 67/24, 67/25, 75/11 blocks 17/1, 21/5, 21/8, 21/11, 42/14, 67/7, 75/14, 75/15, 76/3, 76/4, 78/15 board 28/25, 34/20 body 55/21, 65/18 brevity 52/19 brief 44/21, 62/3 bring 12/21, 58/8, 58/10, 86/5 bringing 3/6, 4/13 brought 3/9, 12/14, 13/14 Broward 32/14, 33/6, 33/7
4		
5		
6		

Brown 6/18
bunch 43/3
burden 28/17, 28/19, 40/23
burdened 5/21
Bureau 1/20, 6/19, 88/3

C

California 5/7, 10/9, 10/11, 11/4, 11/23, 12/11, 13/11, 13/12, 31/4, 31/5, 31/17, 47/16, 70/2, 70/3, 70/8, 70/19
call 4/6, 6/18, 6/20, 7/18, 13/8, 16/7, 20/6, 21/22, 23/13, 30/7, 42/16, 51/23, 73/25, 76/11
calls 9/3, 48/25
came 18/15, 30/10, 32/16
Canada 13/8
cancelled 7/20
Canzano-McNulty 51/20, 51/24
capability 33/8, 61/8
Caparelo 24/2
care 35/8, 40/22, 40/23
Carrier 6/19, 7/4, 43/2, 44/15, 64/1, 64/9, 68/25, 69/5, 69/15
carriers 23/8, 23/19, 30/24, 31/2, 78/10
case 27/11, 28/1, 34/16, 36/16, 36/22, 37/7, 46/16, 47/17, 53/20, 53/21, 54/20, 54/21, 54/24, 56/3, 80/14
cases 65/18, 68/20
Cathy 6/18
caught 56/12
caused 3/11, 29/3, 29/4
causes 55/9, 55/12
cautious 70/15
cautiously 58/12
cell 36/2
cellular 24/10, 27/7, 36/19, 39/20, 39/23
cellulars 78/21
Center 1/16, 37/18, 64/11, 66/7, 66/9
centers 37/19, 37/21, 37/24, 37/25
central 15/11, 16/1, 16/21, 16/23, 29/19, 65/9, 77/13
certainty 42/4
CERTIFICATE 88/1
certified 42/7, 88/7
CERTIFY 88/4
CHAIRMAN 1/10, 3/4, 5/11, 7/15, 8/6, 10/19, 12/24, 13/6, 14/15, 14/23, 15/4, 15/7, 16/4, 17/8, 19/12, 23/23, 24/1, 25/14, 26/5, 26/12, 27/5, 27/10, 27/17, 31/24, 33/18, 36/4, 40/13, 44/5, 44/9, 45/23, 47/22, 48/22, 51/18, 52/2, 52/7, 52/10, 52/18, 56/6, 56/8, 56/15, 57/10, 64/19, 69/3, 69/13, 69/17, 69/22, 70/14, 73/6, 74/18, 74/22, 79/1, 79/10, 79/15, 81/9, 81/14, 81/18, 81/23, 82/6, 84/4, 84/8, 84/17, 84/24, 85/20, 86/20
Chairman's 9/14
change 56/14, 76/2
changed 76/3
changes 26/8, 48/1
changing 35/24
charge 86/25
CHARLES 2/9, 52/20
chastise 13/8
check 16/10, 48/17, 65/19, 77/18, 78/6
Chief 1/20, 6/19, 88/3
chose 12/21, 31/1
chosen 75/1, 75/16, 75/22
circumstance 63/4
circumstances 4/24, 6/21, 70/11
cite 56/5
cited 46/16
citizens 5/16, 9/8, 9/19, 40/18
city 28/20
clarification 29/16
clarified 31/22, 34/11
clarify 15/1, 43/12, 73/8, 74/2, 74/5, 82/14
CLARK 1/11, 17/11, 22/17, 22/23, 23/12, 23/14, 23/20, 24/6, 39/14, 45/15, 45/18, 45/22, 45/25, 46/3, 51/22, 52/1, 52/4, 53/13, 53/22, 53/25, 54/4, 54/19, 55/6, 55/24, 56/10, 70/23, 71/4, 71/12, 71/16, 71/23, 72/4, 72/7, 72/10, 72/13, 72/17, 73/2, 74/4, 74/10, 72/4, 75/9, 75/18, 75/23, 76/8, 76/18, 77/1, 79/24, 80/17, 81/2, 81/11, 82/4, 84/21
Clark's 77/23
clear 26/25, 51/23
clearly 34/1, 34/24, 34/25, 56/21, 59/12
CLEC 77/25
CLECs 18/14, 77/23, 78/18
close 30/7, 77/2
code 3/19, 3/24, 3/25, 4/8, 8/9, 16/21, 17/3, 17/9, 17/24, 19/7, 20/12, 20/16, 23/1, 23/2, 24/23, 25/2, 26/8, 28/4, 30/19, 32/18, 42/25, 44/16, 44/25, 45/3, 58/15, 61/7, 62/16, 62/18, 63/17, 64/11, 65/10, 66/7, 66/9, 66/10, 66/13, 67/13, 68/19, 69/10, 72/8, 72/21, 86/1
codes 3/10, 3/13, 4/11, 4/15, 6/10, 12/20, 15/12,

15/22, 15/24, 16/2, 16/9, 16/23, 17/18, 18/11, 18/20, 18/22, 18/25, 19/5, 19/11, 19/18, 20/3, 20/7, 20/18, 21/4, 25/15, 26/12, 29/19, 29/20, 30/12, 31/12, 32/5, 32/6, 32/24, 33/1, 33/5, 35/1, 37/23, 38/1, 38/18, 43/1, 43/24, 43/25, 54/9, 54/14, 57/6, 59/9, 59/18, 59/22, 59/24, 60/3, 63/18, 64/12, 65/9, 65/12, 70/2, 70/5, 70/11, 70/12, 70/20, 71/21, 74/25, 77/13, 82/16, 82/22, 82/25, 83/2, 83/4, 83/6, 83/16, 84/3
cognizant 52/16
collapse 34/25
Colorado 23/16
comfort 42/19
comfortable 34/22
Commenced 1/14
comment 14/17, 70/1, 73/5, 81/15, 83/9, 83/10, 83/12, 83/15
comments 12/3, 12/5, 12/7, 12/10, 14/12, 14/16, 14/20, 40/8, 40/13, 44/6, 52/13
COMMISSION 1/1, 3/14, 4/14, 4/20, 5/1, 5/15, 6/4, 6/13, 6/22, 11/8, 12/14, 12/22, 19/20, 21/19, 22/4, 22/10, 25/8, 26/7, 26/17, 27/8, 27/12, 27/13, 28/6, 28/12, 28/19, 31/10, 33/11, 35/6, 36/20, 36/21, 37/4, 37/11, 46/13, 47/10, 47/14, 47/16, 48/9, 48/14, 49/12, 53/4, 53/10, 54/17, 55/19, 56/24, 58/2, 68/17, 68/21, 83/10, 83/12, 84/2, 86/20, 88/3, 88/5
COMMISSIONER 1/10, 1/11, 1/12, 7/16, 8/7, 10/17, 11/22, 12/23, 13/1, 13/9, 13/22, 13/23, 14/3, 14/10, 17/11, 19/23, 20/20, 20/21, 21/6, 21/12, 21/15, 21/19, 22/3, 22/8, 22/16, 22/17, 22/23, 23/12, 23/14, 23/20, 24/6, 24/12, 27/15, 29/14, 30/6, 31/21, 31/23, 34/11, 34/22, 35/24, 38/22, 39/5, 39/13, 39/14, 39/16, 41/8, 41/17, 43/5, 43/15, 43/21, 44/1, 44/4, 44/8, 45/15, 45/18, 45/22, 45/25, 46/3, 46/7, 46/24, 47/5, 49/11, 49/24, 49/25, 51/11, 51/22, 52/1, 52/4, 53/13, 53/19, 53/22, 53/23, 53/25, 54/4, 54/6, 54/19, 54/23, 54/24, 55/6, 55/8, 55/24, 56/4, 56/5, 56/10, 58/18, 59/13, 60/20, 61/2, 61/6, 61/15, 61/22, 62/3, 62/19, 62/24, 63/7, 63/14, 63/20, 64/6, 64/18, 65/7, 65/22, 66/1, 66/2, 66/3, 66/15, 66/17, 68/13, 69/5, 70/23, 71/4, 71/12, 71/16, 71/23, 72/4, 72/7, 72/10, 72/13, 72/17, 73/2, 74/3, 74/4, 74/7, 74/10, 75/2, 75/9, 75/18, 75/23, 76/8, 76/18, 77/1, 77/6, 77/21, 77/22, 78/3, 78/7, 78/8, 78/11, 78/19, 79/4, 79/11, 79/22, 79/24, 80/1, 80/17, 81/1, 81/2, 81/6, 81/11, 81/20, 82/4, 82/10, 82/12, 83/20, 84/15, 84/20, 84/21, 84/22, 84/23, 85/3, 85/7, 85/15, 85/22, 86/3, 86/13, 86/15, 87/2
Commissioners 3/5, 4/5, 5/8, 5/11, 6/24, 8/12, 23/17, 24/5, 42/18, 45/14, 52/25, 57/4, 57/12, 62/13, 68/25, 69/20, 70/21, 76/21, 79/1, 79/16, 81/25, 85/1
Commissions 22/25, 30/8, 30/13, 30/24, 30/25, 45/2, 45/11, 47/11, 71/8, 72/24
commitment 10/18, 11/7
committed 49/3
Committee 32/19, 60/18, 65/16
Common 6/19, 15/23, 18/5, 55/16
communication 15/15
Communications 2/5, 2/10
companies 43/10, 64/15, 65/4, 67/1, 85/23
Company 2/10, 27/11, 41/7, 49/8, 51/13, 59/1, 63/3, 63/5, 63/6, 66/19
compared 32/24, 72/21
comparison 70/18
compete 28/10
competing 67/5
competition 19/14, 19/17, 35/17, 41/2
competitive 7/4, 28/6, 35/15, 35/25
competitively 64/21, 75/13
competitor 37/22
competitors 29/5
complain 87/4
complete 39/10
complex 57/21
compliance 24/23, 65/14
conceivable 19/6, 66/10
concentrated 68/3
concept 17/12, 75/13
concern 3/12, 3/16, 9/7, 9/22, 9/23, 14/8, 25/1, 31/25, 55/25, 57/14, 69/20, 80/23
concerned 40/21, 41/21, 42/6, 48/23, 49/4, 49/10, 51/6, 52/14, 58/3, 64/25, 69/8, 81/4
concerns 12/14, 53/14, 60/2, 64/19, 67/16
Concluded 1/15
concur 8/9, 50/1, 50/24, 52/23, 83/4, 84/1
concurrent 79/7, 80/9
concurs 52/12
conducting 6/2, 69/10
CONFERENCE 1/8, 1/16
conferred 55/20
conflicting 3/18, 4/25, 14/22, 23/5, 33/16
confused 43/15, 71/5
confusion 73/9, 85/24
congratulations 52/10
conjunction 21/21, 23/2, 30/19, 45/3, 50/10, 75/19

Connecticut 46/19
Conner 73/4
CONNERS 2/6, 4/3, 15/2, 15/8, 74/16
consecutive 69/23
consensus 23/3, 26/14, 26/21, 27/1, 29/9, 29/12, 31/25, 32/3, 45/5, 47/2, 49/14, 65/16, 71/15, 80/15, 83/2
consequences 24/16
conservation 23/7, 26/3, 26/23, 30/2, 30/9, 31/1, 31/7, 31/10, 31/11, 37/16, 39/8, 46/18, 69/14
conserve 31/12
consideration 67/13
considerations 67/10
consistent 3/18, 30/21
consolidate 37/20
consolidated 37/24, 68/2
consolidation 37/18
constitutes 88/8
constraints 39/22, 61/17
consumer 35/19
consumers 44/13, 48/24
containing 55/4
contaminated 67/23
contemplated 56/2
contentious 81/17
continue 35/3
continuing 34/23, 55/10
contradictory 4/2, 4/10, 12/17, 43/9
control 19/10, 19/18, 29/1, 42/11
convene 20/9
convened 3/2
conversations 43/16
convinced 36/24
cooperation 39/3
cooperatively 40/15
cordial 6/20
correct 7/12, 14/16, 21/9, 26/8, 26/19, 27/15, 33/20, 46/3, 47/3, 54/3, 62/22, 62/23, 69/19, 71/19, 75/12, 78/16, 82/14, 84/7
correctly 27/23
cost 29/6, 29/7
Council 22/14, 58/23, 65/23
counsel 8/20, 47/24, 47/25, 48/11, 68/17
Counsel's 48/18, 48/20, 84/11
countless 5/16
country 28/13, 46/15
County 5/22, 18/10, 18/16, 19/22, 28/21, 32/14, 33/6, 33/7, 61/14, 82/2, 88/2
couple 8/21, 13/10, 14/21, 37/14, 53/2, 57/13, 58/19, 59/17, 60/25
course 7/22, 10/8, 10/24, 39/24, 49/4
create 28/9, 28/13
created 5/19, 7/3, 34/15, 36/21
creating 17/15, 28/17, 28/18
critical 6/4, 24/24
crunched 72/25
CSR 1/19, 88/3
currently 58/5, 70/2, 82/24
customer 63/25, 64/2, 69/1
customers 4/16, 24/16, 24/24, 41/4, 41/5, 42/5, 49/5, 69/6

D

D.C. 8/4, 15/10, 85/5
Dade 5/22, 28/21, 33/5, 77/17, 82/2
danger 54/7, 54/12, 54/13
data 18/9, 33/16, 62/14
DATE 1/13, 53/4, 59/8, 59/19, 59/21
dates 3/25, 62/21
day 85/4
days 80/24
deal 38/8, 38/10, 41/24, 55/14, 60/15, 61/24, 80/24, 86/9
dealing 37/11
DEASON 1/10, 21/12, 21/15, 21/19, 22/3, 22/8, 22/16, 29/14, 30/6, 31/21, 34/11, 46/24, 47/5, 49/11, 49/24, 61/2, 77/6, 79/4, 80/1, 81/6, 82/10, 82/12, 84/15, 84/23, 86/13
December 11/25, 31/16
decide 16/15, 19/3, 26/13, 35/6, 48/15
decided 5/5, 50/9, 52/7
decision 12/7, 19/21, 31/4, 45/4, 80/22
decisions 23/2, 30/20, 48/6
declaration 55/1
declare 4/20, 38/11, 43/2, 54/18, 72/3, 72/8, 72/17, 72/22, 73/12
declared 15/21, 19/2, 42/22, 43/10, 54/13
declares 42/7
declaring 56/20
decline 45/10
defense 55/16
defer 68/16
defined 73/18

<p>definition 54/7</p> <p>defocus 73/20</p> <p>degree 5/21, 17/11, 19/13, 25/11, 26/6, 34/8, 34/14, 42/25, 48/7, 70/14</p> <p>delegate 45/10, 86/21</p> <p>delegated 22/19, 30/12, 44/24, 45/1, 46/9</p> <p>demand 16/8, 18/13, 20/18, 36/1, 82/19</p> <p>demonstrate 63/16</p> <p>deny 18/18</p> <p>depends 59/4, 60/13, 60/23, 64/8</p> <p>described 64/23</p> <p>detailed 43/24, 56/16, 58/13</p> <p>details 57/19</p> <p>determine 32/2, 54/25, 81/13, 85/25</p> <p>determined 20/14</p> <p>develop 26/22, 45/13</p> <p>devil 57/19</p> <p>dial 28/23, 36/15</p> <p>dialing 17/22, 27/24, 40/22, 48/2, 58/16</p> <p>dialog 42/17</p> <p>dibromide 55/5</p> <p>differ 30/7</p> <p>difference 70/25, 72/4</p> <p>differentiated 43/18</p> <p>difficult 7/6, 48/3, 52/5, 60/1</p> <p>difficulties 44/16</p> <p>difficulty 28/8, 44/18</p> <p>digit 60/12</p> <p>digits 28/23, 36/15</p> <p>dilemma 9/7</p> <p>direct 14/5, 88/8</p> <p>direction 67/20</p> <p>Director 2/6, 4/3, 7/23, 8/4, 15/9</p> <p>disagree 6/5, 28/14, 86/21</p> <p>disappointed 52/3</p> <p>disaster 55/15</p> <p>disasters 55/11</p> <p>discontinues 63/25</p> <p>discovery 58/2</p> <p>discussed 37/14, 37/17, 66/5, 79/18</p> <p>discusses 79/19</p> <p>discussion 28/22, 66/23, 73/20</p> <p>discussions 24/19</p> <p>dispute 27/6, 48/10</p> <p>disputes 26/18</p> <p>distance 24/11</p> <p>distinction 16/20</p> <p>distributed 6/12, 7/2, 17/12, 25/17, 36/10</p> <p>distribution 29/1, 69/24, 72/11</p> <p>diverged 28/1</p> <p>divide 59/23</p> <p>Division 2/2, 2/5</p> <p>DOCKET 1/4, 69/11, 88/5</p> <p>doesn't 19/12, 35/13, 35/14, 35/21, 43/3, 71/11, 73/22, 86/20</p> <p>doling 67/6</p> <p>dollars 4/16, 29/4, 29/6, 29/7</p> <p>DONNA 2/8, 51/19</p> <p>double 70/4</p> <p>doubling 35/1</p> <p>doubt 27/22, 29/13, 55/25</p> <p>draft 84/11</p> <p>duration 62/10</p> <p>during 21/6</p>	<p>engineers 41/13</p> <p>ensure 41/2, 55/12, 67/21, 68/1</p> <p>entails 20/2</p> <p>enter 28/10, 64/25</p> <p>entrant 66/5, 66/9</p> <p>entrant's 66/12</p> <p>entrants 19/14, 64/12</p> <p>enunciated 53/21</p> <p>environment 28/13</p> <p>equip 15/17</p> <p>error 34/14</p> <p>Esplanade 1/17</p> <p>establish 25/24</p> <p>Establishment 1/5</p> <p>estimate 18/13</p> <p>ethylene 55/5</p> <p>event 49/13, 49/21</p> <p>exception 7/1</p> <p>exclusive 44/22, 51/9</p> <p>Excuse 69/4</p> <p>exemption 10/12</p> <p>exhaust 3/25, 4/1, 4/15, 24/16, 25/4, 59/21, 72/5, 73/3, 74/13</p> <p>exhausted 5/24</p> <p>exhausting 3/13, 54/10, 54/12</p> <p>exhaustion 62/17, 62/21, 72/21</p> <p>exhausts 44/16</p> <p>existed 33/2, 54/25</p> <p>existing 55/10</p> <p>exists 8/9, 62/9, 63/4</p> <p>expect 61/13, 64/16</p> <p>expedited 12/11</p> <p>expeditiously 11/7, 11/8, 38/19, 61/24</p> <p>experience 32/12</p> <p>experts 34/1</p> <p>explanation 53/15, 70/6</p> <p>explore 10/7, 79/18, 80/12</p> <p>expressed 9/15, 60/2</p> <p>extend 20/12, 23/10</p> <p>extended 11/25, 22/25, 30/17, 62/11</p> <p>extensions 65/13</p> <p>extenuating 70/10</p> <p>extraordinary 3/22, 43/17, 43/19, 44/1, 44/3, 70/25, 71/7, 71/9, 71/17, 72/9, 73/21, 74/1, 74/12</p> <p>extreme 4/18</p>	<p>FLORIDA 1/1, 1/17, 3/7, 4/12, 4/16, 4/24, 5/18, 5/20, 5/23, 6/15, 7/5, 9/9, 9/19, 11/16, 12/12, 15/19, 15/21, 15/22, 16/2, 17/13, 17/14, 17/18, 17/19, 17/21, 17/22, 19/14, 19/15, 19/20, 24/10, 25/3, 29/11, 29/18, 31/18, 33/16, 33/23, 37/20, 38/13, 40/19, 44/13, 44/17, 48/13, 57/11, 70/3, 70/13, 76/13, 76/23, 82/3, 84/6, 88/1, 88/5</p> <p>Floridians 4/19, 28/18, 33/12, 36/6, 37/7, 70/6</p> <p>flow 83/16</p> <p>flowing 58/14</p> <p>FLOYD 2/7, 24/2</p> <p>fly 7/19</p> <p>focus 57/7</p> <p>focusing 56/12</p> <p>folks 18/15, 60/15</p> <p>follow 7/23, 18/17, 31/19, 44/19, 48/16, 77/22</p> <p>followed 28/7, 70/15</p> <p>follows 66/4</p> <p>food 87/4</p> <p>forced 17/21, 17/22</p> <p>forgot 86/16</p> <p>formal 11/14</p> <p>forms 44/25</p> <p>Fort 61/12, 76/24</p> <p>forum 41/19</p> <p>found 43/20</p> <p>four 6/25, 15/22, 32/4, 32/13</p> <p>FPSC 1/20, 2/2, 2/4</p> <p>frame 41/18, 73/2, 75/1</p> <p>framework 35/15</p> <p>freeze 19/5, 42/23, 43/25, 82/15, 82/17, 82/24, 84/5</p> <p>Friday 3/23</p> <p>friendly 81/7</p> <p>friends 36/15</p> <p>frustrated 8/25</p> <p>frustration 38/5, 57/5</p> <p>functional 48/7</p> <p>fundamental 32/1</p> <p>future 15/17</p>
G		
		<p>GARCIA 1/10, 3/4, 5/11, 7/15, 8/6, 12/24, 13/6, 14/15, 14/23, 15/4, 15/7, 16/4, 17/8, 19/12, 23/23, 24/1, 25/14, 26/5, 26/12, 27/5, 27/10, 27/17, 31/24, 33/18, 35/24, 36/4, 44/5, 45/23, 47/22, 48/22, 51/18, 52/2, 52/7, 52/10, 52/18, 56/6, 56/8, 56/15, 57/10, 64/19, 69/3, 69/5, 69/13, 69/17, 69/22, 70/14, 73/6, 74/18, 74/22, 79/1, 79/10, 79/15, 81/9, 81/14, 81/18, 81/23, 82/6, 84/4, 84/8, 84/17, 84/24, 85/20, 86/20</p> <p>geographic 27/12</p> <p>give-back 50/4, 50/8, 50/18, 51/14, 86/14, 86/15, 86/16</p> <p>good-faith 41/1</p> <p>governing 55/21</p> <p>government 5/14</p> <p>grandmother 36/14</p> <p>grant 68/8</p> <p>granted 33/3</p> <p>grave 25/1</p> <p>GREER 2/11, 57/2, 59/16, 75/25</p> <p>group 13/25</p> <p>groups 48/12, 75/11</p> <p>growth 18/9</p> <p>guarantee 12/12, 15/16, 49/8</p> <p>guarantees 6/15</p> <p>guess 7/7, 11/11, 23/12, 34/14, 53/25, 56/17, 70/21, 77/1, 77/10, 77/11, 79/2, 80/17, 81/11, 83/3</p> <p>guideline 63/8</p> <p>guidelines 18/17, 32/25, 46/19, 65/9, 65/12, 65/20</p> <p>guys 48/6</p>
H		
		<p>half 29/9</p> <p>Hampshire 23/16, 46/20</p> <p>hand 56/18</p> <p>hand-walk 85/16</p> <p>handles 7/21</p> <p>hangnail 35/7</p> <p>happy 14/19, 17/6, 17/15, 82/21</p> <p>hard 6/5, 8/11, 64/14</p> <p>head 63/9</p> <p>headache 29/3</p> <p>headed 67/20</p> <p>heading 35/17</p> <p>heads-up 40/14</p> <p>health 54/1, 54/8, 55/16</p> <p>hearings 5/16, 6/2, 36/5</p> <p>held 26/11, 27/3</p> <p>help 8/24, 14/3, 16/17, 17/5, 20/19, 40/18, 40/20, 42/5, 68/4, 71/11, 74/21, 86/12</p>
E		
<p>ease 40/23</p> <p>easier 28/24</p> <p>easily 50/8</p> <p>Easley 1/16</p> <p>easy 48/5</p> <p>eat 42/8</p> <p>Eatz 87/4</p> <p>echoed 16/4</p> <p>effect 16/11, 33/7</p> <p>efficiency 66/20</p> <p>efficiently 76/5</p> <p>eligible 54/21</p> <p>emergencies 55/11</p> <p>emergency 1/5, 3/8, 3/9, 4/21, 8/9, 13/14, 13/16, 33/14, 38/12, 53/7, 53/16, 54/18, 54/21, 54/25, 55/1, 55/9, 55/15, 55/22, 55/23, 56/2, 56/7, 56/9, 56/20, 79/6, 80/7</p> <p>empty 41/25</p> <p>encourage 46/12, 47/1, 47/6, 47/11, 52/15, 67/12</p> <p>end 27/18, 33/4, 35/5, 48/10, 51/5, 51/6, 67/22, 80/21</p> <p>endeavor 53/3</p> <p>endorsed 51/9</p> <p>enforce 6/16, 25/19</p> <p>enforcing 65/23</p> <p>engage 28/22, 66/23</p> <p>engineering 48/7</p>	<p>face 9/18</p> <p>facilitator 20/10</p> <p>fact 5/5, 15/24, 17/1, 17/10, 18/10, 32/8, 34/4, 38/4, 38/6, 38/8, 39/3, 68/23, 69/21, 82/7</p> <p>factors 64/4</p> <p>facts 15/18, 38/7, 38/13, 53/20, 63/16</p> <p>fading 75/3</p> <p>fair 19/19, 20/17</p> <p>faith 40/2</p> <p>fantastic 27/24</p> <p>fantasy 48/3</p> <p>fast 38/6, 56/14</p> <p>faster 38/7, 78/17</p> <p>fastest 80/23, 81/13</p> <p>favor 84/18</p> <p>favors 36/21</p> <p>FCC 4/23, 5/4, 6/16, 6/19, 8/23, 9/14, 9/15, 10/4, 10/13, 10/18, 11/17, 13/3, 13/24, 16/16, 21/18, 21/21, 21/23, 22/15, 22/20, 22/24, 25/24, 25/25, 28/7, 30/14, 30/17, 30/23, 31/8, 31/14, 31/20, 34/21, 37/18, 38/19, 39/8, 41/24, 41/25, 44/22, 44/23, 45/1, 45/25, 47/15, 49/18, 50/9, 50/24, 51/9, 68/14, 70/10, 79/9, 79/15, 80/11, 85/8, 85/17, 85/18</p> <p>FCC's 21/22, 47/9, 76/21</p> <p>February 12/4, 12/9</p> <p>federal 5/14, 40/16, 45/13, 53/12, 57/25, 60/16</p> <p>figure 6/23</p> <p>file 10/3, 10/12, 27/7, 58/5</p> <p>filed 3/24, 6/6, 6/25, 11/23, 12/3, 12/4, 12/8, 23/18, 27/11</p> <p>filing 11/12</p> <p>fill 17/25</p> <p>filters 55/3</p> <p>find 5/23, 6/9, 8/8, 9/17, 10/22, 13/7, 17/16, 17/18, 28/7, 28/21, 29/10, 34/7, 35/12, 36/7, 36/8, 36/9, 36/17, 37/1, 37/2, 39/7, 61/15, 61/20, 70/17</p> <p>finding 9/7</p> <p>finds 6/5</p> <p>fine 7/4, 16/4</p> <p>firm 24/2, 53/4</p> <p>firms 67/5</p> <p>fit 54/4</p> <p>five 3/10, 32/13, 35/2, 37/19, 37/24, 37/25, 63/18</p> <p>fix 35/10</p> <p>flexibility 79/17</p>	

<p>helpful 23/15, 50/21, 85/16, 86/19 helps 74/2 high 65/4 hinterlands 13/7 historic 29/22 historical 18/8, 18/13, 26/20 Historically 30/9 history 18/1, 18/2 hit 74/18 hold 6/22, 56/16 holder 67/14 holders 68/19 holding 39/7 holds 64/1 home 13/4 honest 48/12 hope 19/12, 37/4, 44/6, 74/2 hoping 35/18 hundred 72/8, 76/22</p>	<p>57/22, 58/14, 58/16, 58/20, 63/23, 86/10, 86/22 ITEM 1/8, 88/4</p>	<p>79/23, 83/6, 86/10 louder 74/20 low 18/9, 20/6, 66/13 lower 75/6 lowest 67/15, 68/6 lying 37/6</p>
J		
<p>idea 27/24, 63/3, 67/13, 74/24, 76/19 identify 14/25, 23/24, 41/15 ILEC 64/17 ILERI 2/4 Illinois 23/16, 30/22, 60/21, 78/13 immediate 25/6, 53/8, 54/7, 54/8 impact 41/3, 65/2, 66/24, 67/1 impacted 11/10, 77/22 implement 16/16, 20/13, 21/13, 21/20, 22/4, 22/11, 30/12, 44/25, 60/14, 73/17, 76/21 implementation 58/15, 68/9 implemented 23/8, 28/24, 30/5, 31/6, 31/9, 61/11, 76/7, 76/13, 76/25, 77/19, 78/5 implementing 57/20 imply 83/13, 83/18 importance 33/11, 53/3 in-your-face 11/2 inability 34/6 inconvenience 36/6, 36/16 inconvenienced 48/13 increments 20/25 incumbent 50/14 incumbents 50/16 indicated 19/25, 80/3, 80/5, 82/13, 85/9 indicates 68/8 indications 65/6 indicative 62/21 Industrial 65/9 industry 5/8, 11/9, 16/9, 18/17, 19/3, 19/7, 19/8, 19/20, 20/10, 20/11, 23/3, 24/19, 26/2, 26/6, 26/9, 26/10, 26/13, 26/15, 26/21, 27/1, 27/4, 27/6, 27/14, 27/19, 27/23, 28/3, 28/18, 29/7, 30/20, 32/16, 32/17, 32/21, 32/22, 33/8, 37/13, 38/3, 38/4, 38/15, 39/2, 39/3, 40/3, 40/8, 40/20, 41/12, 41/18, 42/4, 45/4, 46/12, 46/13, 46/17, 47/1, 47/6, 47/9, 47/12, 47/24, 48/19, 49/3, 49/13, 49/21, 50/5, 50/6, 52/15, 52/16, 59/6, 59/14, 60/6, 60/15, 63/21, 65/15, 71/14, 71/20, 73/17, 73/18, 73/24, 79/7, 80/9, 80/15, 81/18, 83/1, 83/4, 83/21, 84/1, 84/13, 86/4, 86/22 inefficient 67/6 inflict 4/15 information 3/18, 4/3, 4/9, 4/25, 7/8, 8/12, 9/1, 9/4, 12/17, 14/22, 43/9, 43/13, 43/20, 51/13, 54/11, 57/18, 58/1, 62/5, 62/8, 65/8, 70/16, 76/10, 76/15, 76/17, 77/7, 77/9 informed 3/20, 3/24, 4/7, 12/17, 41/21 initiate 79/7, 79/8, 80/11 input 21/22 installed 55/3 instituted 31/10 instruct 80/8 instructed 22/11 insurance 20/5 insuring 24/24 interest 33/9 Interim 13/12, 13/17, 19/1, 40/1, 46/5, 73/13, 73/14, 73/16, 73/23, 86/6, 86/8 interpreted 83/11 intimately 44/15 introduce 17/3 introducing 16/7 invite 28/11, 47/24 invited 48/11 Issue 8/8, 21/11, 23/9, 25/6, 28/3, 28/16, 36/14, 37/18, 39/15, 40/21, 48/15, 53/1, 53/7, 53/15, 54/15, 55/1, 59/17, 60/3, 67/14, 68/15, 71/8, 79/4, 79/6, 80/2, 80/7, 80/22, 82/9, 85/4, 85/22 issued 3/14, 25/15, 45/16, 45/19, 59/7, 68/2, 68/6 issues 5/18, 7/22, 7/24, 8/2, 8/24, 9/6, 9/16, 10/19, 10/21, 11/15, 11/16, 11/21, 13/10, 14/6, 14/7, 15/1, 22/6, 22/9, 37/16, 38/24, 39/5, 44/23, 51/3, 51/10,</p>	<p>Jacksonville 68/25, 76/24 JACOBS 1/12, 14/10, 19/23, 20/20, 39/16, 62/3, 62/24, 63/14, 63/20, 64/6, 64/18, 65/7, 65/22, 66/1, 66/2, 66/3, 66/15, 66/17, 81/20, 83/20, 84/22 January 3/15 jeopardy 3/11, 3/20, 3/22, 4/12, 15/22, 15/25, 16/3, 16/6, 19/2, 19/24, 20/2, 20/5, 20/15, 20/23, 21/7, 26/3, 26/23, 32/4, 32/15, 33/2, 42/7, 42/21, 42/22, 43/2, 43/10, 43/17, 43/19, 43/24, 44/2, 44/4, 54/13, 54/14, 59/7, 70/12, 70/25, 71/1, 71/7, 71/9, 71/17, 71/23, 71/25, 72/3, 72/9, 72/14, 72/17, 72/22, 73/12, 73/21, 73/25, 74/1, 74/12 job 10/20, 28/12 JOE 1/10, 12/24 JOHNSON 1/11, 7/16, 8/7, 10/17, 12/23, 13/9, 13/23, 14/3, 20/21, 21/6, 24/12, 34/22, 38/22, 39/5, 39/13, 41/8, 41/17, 43/5, 43/21, 44/1, 44/4, 44/8, 44/9, 46/7, 49/25, 51/11, 56/5, 58/18, 59/13, 60/20, 61/6, 61/15, 61/22, 68/13, 74/3, 77/21, 78/3, 78/7, 78/8, 78/11, 78/19, 79/11, 79/22, 84/20, 85/3, 85/7, 85/15, 85/22, 86/3, 86/15, 87/2 joints 69/23 JOY 1/19, 88/3 JULIA 1/11, 41/24 jump 68/19 JUNE 2/2 jurisdiction 4/20, 6/14, 27/22, 30/8, 44/23, 51/10, 55/20, 70/8 justification 36/6</p>	<p>mailing 80/24 major 77/12 man-made 55/12 mandatory 39/18, 39/19, 40/1, 50/3, 50/11, 50/23, 60/21, 78/13, 86/8 manner 25/9, 58/5, 58/8 map 31/19 March 1/13, 3/10 market 19/15, 28/15 Massachusetts 5/3, 12/2, 12/8, 46/16 Matter 1/4, 13/5, 32/8, 33/10, 34/4, 38/9, 40/21, 59/11, 65/17, 84/12 matters 48/21 maximum 79/17 MCI 2/8, 51/20, 52/12 McKINNEY 2/2 McNULTY 2/8 measure 4/18, 30/2, 69/14 measures 23/7, 26/23, 46/18, 80/13, 82/18 mechanism 13/13, 19/10, 39/8, 39/25, 40/1, 60/5 meet 13/21, 19/3, 41/16, 71/19 meeting 41/11, 41/19, 71/14, 79/7, 83/1, 83/8, 83/21, 85/4, 85/5, 85/25 meetings 8/22, 26/10, 27/2, 27/3, 32/6, 47/25, 48/11, 48/19, 51/16, 59/7, 59/15, 71/20, 80/10, 80/16, 84/13 meets 73/17 Melby 4/6 member 27/7, 58/21 members 8/23, 11/9, 13/25, 26/15, 40/9, 47/23, 85/18 mention 48/23, 66/4, 67/9 mentioned 10/9, 51/4, 67/16 mentioning 82/1 mentions 55/8 message 52/25 Messer 24/2 met 63/17, 73/24 method 31/1, 31/7 methodical 14/5, 38/25 metropolitan 77/12 Miami 28/20, 28/21, 61/11, 76/24, 77/11, 77/16, 77/20 mike 16/3 million 70/3 millions 4/15, 29/4, 29/6, 29/7 mind 42/17, 63/24, 65/5, 66/18 minds 30/7 minimal 41/3 minimum 64/11 mirrored 5/6 miscommunication 15/15 miss 53/16, 53/22 Missouri 46/20 mistake 25/15, 33/25 mistaken 27/7, 33/20, 35/2 mode 21/4 model 28/6 moment 19/5, 38/8, 38/14 Monday 13/21 MONICA 2/9, 44/10 Monroe 18/10, 18/16, 19/21, 61/14, 77/17 month 10/14, 12/6, 12/12, 18/11, 32/23, 72/12, 73/15, 75/1, 75/6, 75/8, 75/10, 75/11, 75/15, 75/17 months 5/5, 59/23, 62/14, 62/17, 62/18, 63/9, 65/11, 65/13, 65/14, 72/1 morning 3/5, 4/6, 24/21, 38/17, 51/19 motion 79/11, 79/25, 84/9, 84/18 move 16/12, 16/13, 21/10, 58/12, 79/4, 86/12 movement 84/10 Mr. Charلمان 8/5, 8/20, 14/10, 23/20, 29/15, 86/16 Mr. Conner's 27/18 Mr. Conners 7/10, 7/13, 7/14, 7/17, 7/22, 7/25, 14/12, 14/15, 14/17, 14/19, 14/24, 15/2, 15/6, 15/8, 16/6, 17/8, 17/25, 19/13, 20/4, 20/21, 21/3, 21/9, 21/12, 21/14, 21/17, 21/24, 22/6, 22/8, 22/12, 25/14, 34/10, 34/12, 34/16, 40/17, 73/4, 73/6, 73/7, 74/5, 74/16, 74/19, 74/21, 74/23, 75/4, 75/12, 75/20, 75/25, 76/9, 82/1, 82/6, 82/13, 82/19, 82/21, 83/23, 84/4, 84/7 MR. CONYERS 19/16 MR. GREER 57/2, 57/11, 57/12, 58/18, 59/4, 60/23, 61/5, 61/10, 61/21, 62/2, 67/15, 68/8, 69/20, 76/18, 76/20, 77/4, 77/15, 78/1, 78/4 MR. ILERI 27/9, 62/13, 62/23, 69/9, 69/14, 69/19, 69/25, 72/6, 72/11, 72/15, 72/20, 81/25, 82/5 Mr. Melby 41/22 MR. REHWINKEL 52/20, 53/19, 56/15, 57/1, 64/6</p>
I		
K		
L		
M		

MR. SELF 13/2, 23/24, 24/1, 24/6, 24/9, 24/14, 25/22, 26/5, 26/9, 26/19, 27/16, 28/8, 31/22, 31/23, 35/3, 35/16, 35/23, 37/8, 38/22, 39/4, 39/12, 41/6, 41/10, 42/20, 43/21, 63/14, 63/23, 78/8, 78/16, 78/25, 87/1
 Ms. Barone 44/8, 44/9, 45/17, 45/20, 45/24, 46/4, 47/4, 47/8, 48/22, 49/11, 49/15, 49/25, 51/2, 51/12, 51/15, 52/23
 Ms. Brown 56/21
 Ms. Canzano 51/18
 MS. McKINNEY 3/5, 10/1, 10/16, 11/22, 12/25, 13/22, 14/2, 22/23, 23/14, 27/15, 30/6, 41/21, 43/11, 43/12, 43/14, 44/3, 46/3, 46/23, 53/16, 53/23, 54/3, 54/6, 54/23, 55/7, 56/4, 63/7, 65/7, 65/25, 68/19, 68/20, 69/4, 70/7, 71/3, 71/14, 71/19, 71/25, 72/23, 74/7, 76/14, 79/21, 81/1, 85/6, 85/14, 86/2
 MS. McNULTY 51/19, 51/23, 51/25, 52/6, 52/8, 52/9, 52/11
 MS. SIMMONS 66/3, 66/16, 67/3, 68/16, 68/24, 80/3, 81/15
 MSA 61/11, 61/12, 61/13, 77/16, 77/20
 MSAs 76/22, 78/2

N

name 10/15, 15/2, 15/8, 52/8
 NANC 8/24
 NANPA 2/6, 3/8, 3/20, 4/3, 7/23, 8/4, 8/23, 10/25, 13/24, 13/25, 20/23, 24/23, 27/3, 38/17, 43/16, 43/22, 77/9
 NANPA's 3/17
 nation 11/17, 44/17, 78/20
 national 44/15, 45/13
 natural 55/11
 nature 13/13, 13/15, 58/13, 86/6, 86/8
 necessary 4/19, 80/13
 necessity 54/16
 need 11/10, 17/3, 20/7, 22/7, 23/13, 24/25, 29/16, 31/12, 32/10, 37/10, 38/1, 39/1, 39/2, 40/19, 41/10, 49/17, 50/22, 56/14, 57/18, 64/10, 66/7, 70/6, 73/19, 74/11, 74/19, 75/2, 79/24, 81/22, 86/11
 needed 65/11
 needing 63/17
 needs 4/14, 4/21, 46/11, 53/9, 81/12
 network 76/7
 neutral 64/21, 75/13
 New 5/3, 12/2, 12/4, 15/22, 17/3, 19/14, 23/16, 23/17, 28/4, 30/12, 33/6, 35/15, 37/21, 46/19, 50/13, 56/9, 64/2, 64/12
 night 7/19
 noon 87/3
 normal 59/21, 64/16
 normally 72/2, 75/20
 North 6/9, 7/10, 15/9, 22/13, 58/22, 62/15
 notes 20/22, 82/14
 notice 13/18, 81/3
 notifying 72/5, 73/3
 November 11/24, 31/15
 NPA 24/16, 25/4, 26/22, 27/1, 32/13, 33/6, 42/25, 45/1, 45/8
 NPAs 27/2, 27/4, 73/12, 73/14
 number 16/20, 17/1, 23/7, 25/24, 26/2, 30/9, 31/1, 31/7, 31/11, 37/15, 37/16, 38/20, 43/1, 45/8, 45/11, 46/17, 57/21, 59/8, 59/18, 60/9, 60/10, 60/16, 60/17, 60/18, 60/20, 60/21, 60/24, 61/3, 61/8, 61/10, 61/18, 64/1, 64/5, 67/15, 67/19, 68/7, 69/11, 69/14, 69/24, 70/5, 70/11, 70/12, 70/23, 74/25, 75/5, 76/5, 76/11, 76/19, 76/22, 77/14, 77/19, 78/9, 78/14, 78/21, 78/23, 79/5, 80/2
 Numbering 6/9, 7/3, 7/11, 15/9, 22/13, 30/14, 31/10, 44/23, 51/10, 58/22, 62/15, 65/15, 65/23
 numbers 6/8, 6/11, 6/24, 7/1, 8/16, 10/25, 15/18, 16/1, 16/22, 16/25, 20/1, 20/24, 21/7, 23/9, 24/25, 25/17, 29/2, 29/11, 30/25, 31/13, 34/20, 35/13, 36/1, 36/7, 36/9, 36/10, 36/17, 36/19, 36/20, 37/1, 37/9, 40/6, 42/8, 42/11, 43/3, 48/24, 57/14, 57/15, 57/17, 58/4, 58/6, 58/7, 62/6, 62/7, 62/10, 63/12, 63/24, 64/25, 66/14, 67/7, 67/14, 67/22, 68/2, 68/5, 68/15, 69/1, 69/6, 69/16, 69/18, 70/1, 76/3, 78/15, 82/9
 NXX 23/1, 24/23, 25/2, 30/19, 31/12, 32/24, 33/1, 33/5, 37/23, 38/1, 43/1, 43/25, 45/2, 65/10, 65/12, 82/5
 NXXs 4/4, 4/7, 12/18, 12/20, 17/19, 23/19, 41/22, 42/15, 57/14, 62/22, 69/1, 69/15, 69/17, 72/8, 72/12, 82/1, 82/3, 83/22

O

objection 6/6, 84/16
 occurrence 55/10
 occurring 45/12, 54/9, 60/21
 offer 14/12, 40/2
 offering 15/13

office 9/14, 15/11, 16/2, 16/21, 16/23, 29/19, 48/18, 48/20, 65/9, 77/13, 81/10, 84/12
 offices 77/16, 78/2
 official 22/2, 22/13, 88/3
 officials 40/16
 open 28/15, 70/21
 operate 34/24, 66/6
 operates 34/3
 operation 66/12
 operations 24/10, 24/11
 opinion 10/23, 31/17
 opportunity 8/21, 9/15, 32/2, 32/10, 47/19, 53/6, 72/24
 opposed 51/1, 84/24
 option 79/18
 order 3/14, 4/19, 13/11, 13/12, 16/11, 17/17, 18/19, 20/7, 21/10, 22/24, 23/1, 23/11, 25/7, 25/16, 26/25, 27/12, 27/13, 29/17, 29/18, 29/24, 30/10, 30/16, 30/19, 30/22, 31/18, 31/24, 33/15, 34/10, 34/13, 34/15, 45/1, 45/2, 45/8, 45/11, 45/15, 45/18, 53/8, 53/15, 55/12, 59/7, 59/17, 63/15, 67/18, 68/22, 69/21, 76/7, 79/16, 80/2, 80/6, 80/8, 82/9, 83/6, 83/11, 83/12, 83/14, 83/19, 84/2
 ordered 45/20
 ordering 67/17
 orders 47/10, 49/19, 54/22, 58/15, 79/6
 originally 30/9
 Orlando 76/25
 outcomes 35/17
 outflow 19/10, 19/18
 outline 20/1, 44/21
 outlines 80/13
 outset 44/14
 outstanding 9/24
 overlaid 50/9
 overlay 17/12, 17/13
 overwhelm 9/11

P

PAA 67/18, 69/21, 79/5, 80/2, 80/6, 80/18, 80/25
 pages 88/8
 Palm 61/12
 paradigm 76/2, 76/4
 parallel 49/17
 part 26/2, 35/23, 41/10, 70/7
 participants 41/12, 44/6
 participate 8/1, 28/10, 57/25, 84/13, 86/24
 participated 58/20
 PARTICIPATING 2/1
 participation 39/2
 parties 7/7, 14/14, 23/21, 24/20, 32/2, 41/12, 41/16, 51/6, 60/1, 80/6, 84/14
 passes 84/25
 path 19/21
 peace 55/16
 pending 46/23, 82/25
 Pennsylvania 22/20, 22/24, 23/10, 23/11, 26/25, 30/16, 45/1, 45/8, 45/23
 perceive 53/8
 percentage 63/1, 64/7, 66/14
 percentages 62/7, 64/3, 65/4
 period 21/7, 62/11, 65/5, 75/1, 75/5
 periods 59/21
 permission 11/24
 permit 18/18
 personal 32/11
 personally 15/16
 petition 10/3, 11/13, 11/23, 12/4, 47/15, 49/20, 85/10, 85/12
 petitioned 70/9
 petitioning 11/20
 petitions 12/3
 phone 7/12, 8/1, 36/3
 phones 29/6
 pick 50/15
 pieces 68/4
 pizza 69/23
 PLACE 1/16, 18/3, 35/5, 35/12, 35/21, 37/5, 38/9, 40/1, 44/19, 59/3, 61/19, 63/16, 65/20, 80/10, 82/15, 84/6, 88/5
 plan 1/6, 6/9, 7/3, 7/11, 15/9, 18/2, 18/7, 20/11, 20/13, 26/22, 30/21, 31/6, 31/9, 32/14, 50/7
 plane 7/20
 Planning 62/15
 plans 23/4, 27/21
 pledge 49/6
 plus 80/24
 point 16/19, 20/9, 21/14, 29/16, 32/15, 32/17, 33/6, 43/12, 45/7, 46/4, 46/9, 46/25, 52/4, 53/9, 66/23, 71/9, 73/13, 82/22, 83/25, 84/1, 85/24
 pointed 76/6
 points 6/7, 34/10

policies 6/4
 policy 20/6, 30/14, 46/2
 ponder 44/5
 pool 61/20
 pooling 7/22, 11/1, 11/4, 17/5, 21/10, 21/13, 21/20, 22/5, 22/11, 25/24, 26/4, 30/1, 37/16, 38/20, 39/18, 40/7, 45/8, 45/12, 50/3, 50/7, 50/17, 51/14, 57/21, 58/24, 59/5, 60/9, 60/10, 60/16, 60/17, 60/18, 60/20, 60/21, 60/24, 61/3, 61/16, 61/18, 67/19, 74/15, 75/24, 75/25, 77/3, 78/12, 79/19, 79/22, 86/9
 population 70/4
 portability 61/4, 61/8, 61/10, 61/19, 76/12, 76/19, 76/22, 77/14, 77/19, 78/9, 78/14, 78/21, 78/23
 portable 77/24
 position 28/5, 35/6, 37/5, 70/18
 possibility 55/10, 59/11
 possible 4/11, 41/13, 49/12, 56/14, 65/13, 81/10, 83/7, 85/14
 potential 31/25
 power 55/23
 powerless 25/12
 powers 55/22
 precedent 31/18
 predictability 42/3
 preferential 80/4
 prefix 67/8, 68/2
 prejudice 83/8, 83/24
 premature 72/20
 prematurely 3/14
 preparations 55/13
 prepared 40/9, 59/1, 85/10
 presented 17/11
 preserve 31/12, 54/1, 55/17
 press 40/14
 pretty 51/17, 52/6
 prevent 17/2
 prices 35/19
 problem 5/19, 8/15, 28/16, 32/1, 32/12, 35/23, 37/21, 52/14, 61/13, 61/25, 62/2, 74/8, 77/5, 78/21, 78/24, 80/5
 problems 9/18, 38/16, 68/9, 74/20
 procedurally 40/5, 50/2
 procedure 73/16
 procedures 26/3, 43/24, 71/10, 71/13, 73/13, 73/14, 73/17, 73/25, 74/1
 PROCEEDINGS 1/8, 88/7
 process 9/2, 9/10, 11/14, 11/18, 11/20, 12/1, 12/6, 12/16, 12/19, 13/19, 16/6, 16/10, 19/24, 20/2, 20/5, 29/10, 32/9, 32/10, 33/4, 35/10, 37/11, 39/6, 39/17, 42/2, 42/6, 46/8, 47/4, 47/6, 47/20, 50/24, 51/5, 53/12, 58/2, 59/3, 59/25, 61/19, 65/1, 66/21, 72/25, 74/9, 75/4, 80/20, 86/3, 86/12
 processes 13/19, 38/9, 44/19, 46/6, 49/18
 productive 42/17
 projections 8/17
 pronounce 55/4
 property 55/17
 proposal 60/7, 60/19, 86/5
 proposals 57/19
 propose 46/17
 proposition 11/2
 prospect 6/23
 protect 4/19, 4/21, 9/8, 55/16
 protection 54/15
 protest 27/11
 provide 42/3, 55/15, 57/18, 58/1
 provider 67/7
 providers 19/19, 39/20, 39/23, 42/7, 50/15, 50/18
 provides 41/3, 41/4
 provisions 81/21
 PSC 50/10
 PUBLIC 1/1, 47/23, 47/25, 48/1, 48/8, 48/11, 48/17, 48/19, 48/20, 54/8, 55/16, 84/11, 88/5
 pull 39/19, 42/16
 pursue 39/24, 53/12
 put 9/21, 18/3, 18/20, 19/5, 25/16, 25/20, 28/5, 34/13, 34/18, 34/19, 60/5, 60/18, 64/11
 putting 14/7

Q

quarter 39/10
 question 3/17, 6/13, 8/5, 8/18, 9/20, 9/24, 11/11, 17/9, 22/10, 22/18, 24/7, 29/15, 29/24, 45/6, 53/13, 54/20, 62/4, 62/20, 65/19, 74/13, 80/18
 questionable 54/11
 questioning 65/18
 questions 5/9, 7/12, 8/2, 11/21, 14/4, 14/18, 17/6, 44/8, 52/22, 58/19, 70/22, 70/24, 77/23, 79/2
 quick 12/1, 17/9

R

raise 85/3
 raised 7/24, 13/10, 14/8, 29/15, 39/6, 39/14
 raises 51/3
 ramifications 25/4
 ran 5/13
 range 64/16
 rate 18/9, 29/22, 37/18, 37/19, 37/21, 37/24, 37/25, 62/21, 64/11, 66/7, 66/9
 ration 71/18, 72/2
 rationale 36/11
 rationing 20/16, 21/2, 21/4, 22/19, 22/21, 23/1, 23/3, 30/1, 30/19, 30/21, 39/19, 42/23, 43/17, 45/3, 50/4, 50/8, 51/14, 58/25, 59/5, 59/10, 59/25, 60/4, 60/5, 60/7, 64/20, 66/23, 71/10, 71/13, 74/14, 74/24, 75/4, 75/8, 75/19, 79/23, 83/5, 86/10
 rationings 42/24
 reach 27/20, 29/9, 29/12, 32/3, 45/5, 46/1, 47/2, 49/13, 56/24
 reached 23/3, 27/14, 30/20, 65/16, 80/15
 react 59/2
 reaction 22/4
 reading 22/2
 reads 6/5
 readvertising 55/2
 reality 18/12
 reason 23/6, 41/20, 70/8
 reasonable 30/7
 reassigned 64/2
 recall 53/14
 receive 6/18, 11/24, 12/13, 75/14, 75/22
 received 3/22, 4/6, 5/1, 7/18, 8/17, 12/11, 14/4, 18/16, 31/15, 77/8
 receiving 9/3, 12/17, 78/15
 recommend 19/7
 recommendation 3/6, 3/23, 4/17, 5/7, 5/12, 12/21, 22/18, 23/18, 25/6, 33/14, 38/11, 41/11, 51/3, 58/11, 68/5, 79/14, 80/14, 81/24, 83/2
 recommended 80/8
 recommends 10/6
 reconstructed 18/2
 record 14/22, 23/25, 56/18
 recover 55/14
 recycle 63/24
 reduce 21/10
 reduced 55/14
 reflected 5/14
 reflection 34/6, 34/7
 region 61/9
 regular 73/21, 73/24
 regulations 17/23
 regulatory 65/17
 REHWINKEL 2/9, 52/20
 rejected 33/3
 released 20/25, 21/7
 releases 40/14
 releasing 20/24, 21/1, 21/3, 21/4
 reliability 3/17
 relied 70/16
 relief 1/6, 20/13, 23/2, 26/22, 27/1, 30/20, 32/13, 44/25, 45/4
 relieve 38/1
 remain 43/1
 remaining 82/23
 remarks 52/23
 remember 27/23, 63/8, 63/10, 76/23, 79/17
 report 6/25, 30/10, 77/4
 REPORTED 1/19, 88/7
 REPORTER 88/1, 88/3
 Reporting 1/20, 88/3
 represent 28/2, 34/8, 48/14, 49/7
 representations 8/16
 representative 32/19, 58/22
 representatives 32/20, 32/21, 51/16
 representing 24/3, 24/13, 44/10
 represents 48/21
 reprocess 20/17
 reprogram 29/6, 29/8
 reps 5/8
 Request 11/13, 11/14, 22/12, 42/13, 43/3, 48/15, 50/2, 76/16, 77/24, 77/25, 78/1, 78/4, 78/6, 79/8, 79/12, 79/15, 80/11, 84/9, 85/17
 requested 9/2, 11/13, 65/8, 76/14
 requests 32/25
 require 39/18, 50/4, 50/25, 68/5, 68/15
 required 18/23, 26/24, 41/1
 requirement 76/21
 requirements 47/15, 47/21
 requires 57/21, 68/14, 76/6
 requiring 26/17, 67/13, 68/18, 79/5, 80/2
 research 36/25
 researched 68/21

reserve 53/6
 reserved 65/13
 resident 28/20
 resolution 10/22, 42/9, 60/8
 resolutions 9/18
 resolve 11/15
 resolved 11/21, 15/16
 resolving 14/6, 14/7
 respect 7/17, 8/7, 8/15, 9/21, 13/10, 27/18, 33/15, 35/11, 35/16, 38/11, 38/14, 39/22, 40/25, 42/4, 42/21, 43/10, 50/1, 51/14, 58/24, 74/13, 77/10, 85/4, 85/23
 respond 8/19, 31/24
 response 17/13, 45/6, 84/25
 responsibility 15/11
 restated 79/25
 restrict 18/22, 66/22, 74/25
 restricted 75/7, 78/22, 78/23, 83/16
 restricting 75/5
 restrictions 18/21
 result 19/25, 33/4, 51/7, 80/15, 83/21
 retained 30/13
 returned 65/10
 Review 32/18
 reviewed 32/23
 rises 56/1
 road 14/7, 27/25, 31/19, 35/4, 35/18, 49/23, 68/11
 RON 2/6, 4/3, 15/2, 15/8, 73/4, 74/16
 Room 1/16, 36/2
 route 5/6, 29/2, 50/12, 50/23
 RPR 1/19, 88/3
 rulemakings 39/9
 rules 11/18, 24/23, 33/1, 70/15
 ruling 4/22
 run 20/8, 33/21, 33/22, 33/23, 33/24, 72/18
 running 38/7
 rush 16/1

S

safety 54/1, 54/8, 54/14, 55/17
 SALLY 2/4
 Sarasota 76/25
 scenario 66/25
 schedule 81/4
 scheduled 32/7, 51/17
 scope 66/11
 scrutinizing 65/23
 secede 17/15
 second 29/14, 30/10, 79/10, 79/11, 84/9, 84/18
 seek 49/12, 49/20, 50/25, 86/7
 SELF 2/7, 24/2
 send 71/16, 84/10
 sending 13/23, 13/25
 sense 16/14, 84/2
 sent 4/4
 separate 28/4
 September 22/24, 31/9, 45/20
 sequential 58/5, 58/8, 79/5, 80/2
 sequentially 68/22
 series 6/2, 9/2
 serious 9/6, 52/25, 67/12
 serve 37/22, 64/10
 served 58/21
 SERVICE 1/1, 19/19, 35/18, 64/1, 88/5
 Services 2/3, 8/4, 24/3, 24/9, 24/18, 48/25
 set 3/25, 14/21, 18/7, 18/20, 18/25, 30/14, 67/4, 67/18, 71/20, 72/21, 80/21, 81/10, 82/16, 82/22, 82/23, 83/5
 setting 80/20
 seven 60/11, 62/18
 seven-digit 57/22
 share 25/1
 short 62/10
 shortages 8/15
 show 69/7, 84/25
 shows 64/4
 side 57/10
 sides 43/6, 50/15
 sign 85/21
 signify 84/18
 SIMMONS 2/4
 simple 84/5
 simplify 73/10
 single 6/10, 37/25
 sit 62/11, 63/12
 site 27/4, 43/22
 sits 63/6
 sitting 24/20, 63/3
 situation 10/11, 15/20, 15/23, 17/6, 17/15, 17/24, 18/5, 24/17, 25/11, 25/12, 26/20, 26/24, 29/17, 32/4, 32/16, 33/2, 35/5, 35/22, 37/2, 42/22, 52/17, 62/9, 63/22, 70/13, 83/17
 situations 22/22, 32/9, 38/10

six 35/2, 62/14, 65/11, 65/14
 six-digit 57/23
 slow 16/11
 SMAS 76/11
 solution 5/19, 46/8, 46/14, 46/22, 47/3, 47/12, 47/14, 47/19, 49/3, 49/9, 49/22, 51/7, 52/15, 53/5, 56/25, 61/23
 solutions 38/20, 41/15, 41/16, 49/7, 50/6, 85/25
 solve 26/18, 38/16
 sort 8/24, 20/13, 28/6, 46/1, 56/11, 82/10
 sought 34/21
 sounder 68/18
 sounds 34/12, 36/23, 83/20
 space 34/3
 speakers 40/25
 specified 19/23
 speculate 18/4
 speech 36/13
 speed 80/20
 split 17/24, 32/14
 Sprint 2/9, 44/10, 44/13, 44/14, 52/13, 52/21
 Sprint's 64/7
 squeals 16/3
 stab 74/17
 Staff 3/12, 3/17, 3/24, 4/10, 4/13, 4/17, 4/22, 5/5, 5/6, 5/9, 5/12, 6/25, 7/25, 8/5, 8/10, 8/22, 8/25, 10/5, 12/14, 12/21, 13/21, 14/9, 15/14, 17/4, 22/17, 28/12, 29/10, 33/20, 36/7, 36/25, 37/14, 38/11, 39/7, 41/11, 47/24, 48/16, 56/18, 58/21, 62/4, 63/11, 68/21, 69/8, 76/14, 79/13, 79/16, 79/18, 80/8, 80/9, 80/13, 81/9, 81/12, 81/23, 84/11, 85/8, 85/20
 Staff's 3/16, 25/6, 31/17, 33/14, 51/2, 68/5
 stage 67/19
 stages 38/15, 47/18, 73/19
 STAN 2/11, 57/2, 75/25, 76/6, 77/8
 standard 53/21
 standards 45/13
 standpoint 48/8
 stark 70/18
 start 10/24, 15/13, 23/24, 71/10, 87/5
 started 36/5, 43/18
 starting 67/14, 68/6
 starts 71/12
 state 3/7, 4/22, 5/16, 5/17, 6/10, 9/8, 9/19, 22/25, 28/11, 29/7, 30/8, 30/13, 30/23, 30/25, 33/5, 33/15, 34/8, 35/20, 36/13, 38/12, 40/19, 41/2, 44/17, 45/2, 45/11, 47/10, 47/11, 48/21, 53/7, 54/18, 55/1, 55/13, 55/18, 55/21, 56/17, 65/21, 68/21, 72/24, 77/2, 88/1
 statement 7/17, 10/1
 statements 8/10
 states 4/23, 10/2, 12/2, 12/23, 15/23, 22/21, 23/6, 23/10, 30/18, 39/21, 44/24, 46/15, 60/25
 statewide 1/5
 status 25/2
 statute 55/7, 56/2
 statutes 54/17
 stenographically 88/7
 step 6/14, 26/7, 26/17, 42/18, 47/13, 58/25, 73/11, 73/23, 77/9, 77/25
 steps 16/8, 20/8, 73/11
 stifle 19/13, 19/16
 stop 6/14, 40/5, 40/6
 straight 14/22, 81/7
 strategies 64/24
 strict 54/7
 strikes 27/17, 56/19
 subdivision 55/21
 sufficient 29/23, 33/5, 50/12, 50/22
 summary 44/20
 supervision 88/8
 supervisor 22/13
 supply 17/1, 76/5
 support 3/16, 38/13
 supports 52/12
 surrounding 4/24
 survey 69/11
 SUSAN 1/11
 switches 57/23
 system 16/25, 26/16, 31/7, 34/15, 34/24, 35/1, 35/11, 35/13, 35/21, 66/6, 67/3, 85/11, 86/10
 systems 29/8, 58/7

T

table 24/21, 40/17, 41/23
 tailored 42/25
 talk 8/22, 38/19
 talked 30/16
 talking 71/21
 Tallahassee 1/17
 Tampa 76/23
 tariffs 58/5
 technical 8/2, 39/22, 57/21, 58/13, 60/10, 61/17, 61/25, 76/6

techniques 17/4
 technological 55/8, 55/12
 technologies 35/20
 teed 39/15
 telecommunications 54/16
 teleconferencing 2/6
 telephone 7/21, 58/4, 58/6, 63/24, 66/14, 76/2
 telephones 54/16
 tend 64/12, 78/17
 term 64/13
 terminology 73/9
 terms 16/9, 33/13, 35/25, 37/15, 38/17, 40/4, 63/17, 64/5, 66/13, 66/20, 67/11, 84/5
 TERRY 1/10
 Texas 23/16
 Thank 7/15, 20/20, 22/16, 24/1, 31/21, 44/11, 49/24, 52/1, 52/9, 52/18, 57/1, 75/23, 76/8, 78/7
 Thanks 52/11
 they've 6/12, 13/20
 third 32/7
 thoughtful 56/16
 thousand 42/14
 three 32/23, 54/14, 72/15, 72/18, 73/15, 75/8, 75/10, 75/14, 75/15
 throttle 16/8, 20/18, 82/19
 TIME 1/14, 5/2, 5/3, 7/3, 12/12, 15/25, 16/15, 18/3, 18/7, 19/20, 20/12, 25/5, 25/7, 25/8, 30/17, 32/12, 32/18, 33/3, 34/2, 39/11, 41/17, 45/10, 48/2, 50/5, 50/6, 52/6, 54/10, 54/12, 59/19, 62/6, 62/12, 63/11, 63/24, 65/5, 66/11, 67/8, 72/22, 73/2, 75/1, 75/5, 77/10, 80/19, 88/5
 tools 22/7
 top 13/20, 63/8, 76/22
 topic 44/12
 touched 64/20
 tough 28/19
 track 13/3, 49/17
 trade-off 66/18
 transcribed 88/8
 transcript
 translation 60/12
 translations 57/22, 57/23
 treatment 12/13
 true 16/22, 36/8, 36/24, 42/10, 88/8
 trust 48/4
 truth 27/19, 35/20
 Tuesday 1/13, 32/7
 turn 22/14
 turns 66/18
 two 9/20, 21/25, 27/2, 27/4, 32/5, 32/6, 32/20, 32/21, 49/16, 72/15, 73/11, 73/18
 type 18/13, 29/22, 29/25, 30/1, 56/24, 64/8, 82/13, 82/15, 82/17, 82/18, 83/14
 types 54/20, 57/20

U

unanimously 84/25
 underutilized 64/13
 Union 17/15
 United 15/23
 unreliable 4/10, 4/25, 54/10
 unused 36/9, 36/10, 63/22
 urge 44/18, 45/14, 67/17
 urgency 12/15
 utilization 16/21, 29/20, 29/22, 57/14, 64/5, 64/7, 64/15, 66/13, 69/12, 79/5, 80/3
 utilize 80/13
 utilized 16/23, 17/2, 29/21

V

valid 6/7, 33/1
 vanity 58/6
 Varma 10/16, 10/17
 view 45/12
 voluntarily 50/12
 voluntary 39/25, 41/1, 50/7, 51/14, 58/24, 86/5, 86/9, 86/13, 86/16
 volunteer 30/24, 50/19, 50/21
 volunteered 23/8, 31/2
 volunteering 40/4
 volunteers 23/13, 23/22
 vote 5/17
 vulnerability 55/14

W

waited 12/19
 waiting 4/22, 5/4, 11/17
 waiver 10/12, 12/9, 34/21, 47/15, 47/21, 49/13, 50/25, 53/12, 56/20, 70/10, 79/8, 79/12, 79/19, 80/12

wake-up 20/6
 walk 28/19, 85/17
 warehouse 63/19
 Washington 15/10, 35/8
 water 55/3
 waterfront 65/2
 Wayne 4/6
 Web 27/3, 43/22
 week 6/2, 7/18, 23/18, 29/9, 32/5, 32/8, 33/10, 33/20, 41/19, 43/8, 43/15, 59/15, 71/5
 weekend 13/3
 weeks 8/21, 37/15
 welcome 28/11
 welfare 54/2, 54/8
 wells 55/3
 West 61/12
 wife 52/2, 52/7
 willing 6/21, 40/3, 40/6, 40/7, 40/25, 42/15, 48/6, 48/18, 50/19, 56/22, 56/23, 57/25, 86/24
 willingness 9/17, 85/9
 Wireless 2/7, 18/14, 24/3, 24/8, 24/9, 24/18, 24/22, 28/2, 78/10, 78/13
 wish 27/21
 WITNESS 59/16
 word 21/2, 27/18, 54/13
 words 25/18, 26/14, 62/9, 63/4
 work 6/21, 7/6, 9/17, 10/21, 11/3, 11/6, 11/8, 13/4, 25/24, 32/10, 33/19, 35/14, 35/21, 38/3, 38/19, 38/24, 39/17, 42/1, 46/5, 46/21, 47/4, 47/11, 56/22, 56/23, 56/24, 81/19, 85/11, 86/17, 86/22
 worked 17/10, 23/15
 working 8/11, 34/25, 35/13, 40/15, 49/3, 50/5, 50/14, 51/7, 60/16, 85/18
 works 16/25, 42/2, 66/6
 workshop 37/15
 workshops 39/7
 WorldCom 2/8, 51/21, 52/12
 worried 35/3
 worries 13/6, 17/14, 34/5
 worry 5/20, 22/7, 29/8, 73/19
 worthy 68/11
 writing 20/22
 wrong 22/20, 33/21, 34/10, 37/3, 37/6

X

X 59/19

Y

year 5/25, 11/19, 17/17, 19/7, 29/23, 34/5, 82/5
 years 3/13, 5/21, 5/25, 17/16, 28/3, 32/13, 34/4, 35/2, 53/2, 72/16, 72/18, 72/19
 Yog 85/17
 Yog's 10/15
 York 5/3, 12/2, 12/4, 23/17, 28/4, 50/13