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RECORDS AND
REPORTING

July 28, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 981444-TP (No. Utilization)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Variance of Number Pooling Requirement for 1AESS Switches, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White
(2)

Enclosures

APP _____
CAF _____
CMP alter
COM _____
CTR _____
ECR _____
LEG I
OPC _____
PAI _____
RGO _____
SEC I
SER _____
OTH _____

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

RECEIVED & FILED
[Signature]
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 981444-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 28th day July, 2000 to the following:

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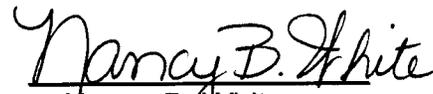
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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Number Utilization Study)
Investigation into Number)
Conservation Measures)
_____)

DOCKET NO. 981444-TP

FILED: July 28, 2000

**MOTION FOR VARIANCE OF NUMBER POOLING
REQUIREMENT FOR 1AESS SWITCHES**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and files its Motion for Variance of Number Pooling Requirement for 1AESS Switches. In support of its Motion, BellSouth states the following:

1. On September 15, 1999, the Federal Communications Commission issued Order No. 99-249, granting the Florida Public Service Commission ("Commission") authority to implement interim number pooling.

2. On May 30, 2000, the Commission issued Order No. PSC-00-1046-PAA-TP accepting the parties offer of settlement, as modified in the order, requiring all local number portability capable (LNP) carriers to implement number pooling in the 954, 561, and 904 by January 22, 2001, February 5, 2001 and April 2, 2001, respectively.

3. The 1AESS switch is a first generation digital switch manufactured by Lucent Technologies ("Lucent"). BellSouth currently has nineteen (19) 1AESS switches in Florida. (See Exhibit 1) Of the 19 switches, ten (10) switches are in the three metropolitan statistical areas (MSAs) where the Commission has required number pooling to be implemented by April 2, 2001.

4. In approximately late May or early June of 2000, BellSouth became aware that Lucent did not intend to develop the software necessary to implement number pooling in the IAESS switch due to Lucent's announced discontinuance of support for the

1AESS switch in the fourth quarter 2003. At this time, BellSouth is not aware of any potential workaround that will allow the 1AESS switches to participate in number pooling.

5. BellSouth's current schedule indicates that eighteen of the nineteen 1AESS switches in Florida will be replaced by the end of the fourth quarter of 2003. The last 1AESS switch is currently scheduled for replacement in July 2004. The current average replacement cost of each 1AESS is approximately \$8.5 million.

6. BellSouth has completed its initial review of the number blocks available to be donated to the pools for each exchange once number pooling begins in these three NPAs.¹ Based on this review, the ten 1AESS switches in these NPAs contain only 21 Non-Contaminated² and 16 Contaminated³ blocks. (See Exhibit 2)

7. BellSouth requests that the Commission grant BellSouth a variance from Order No. PSC-00-1046-PAA-TP, for technical reasons with regard to the 1AESS switches in Florida until such time as those switches are replaced. BellSouth does not believe granting the requested variance will adversely impact the implementation of number pooling in these NPAs. BellSouth will implement number pooling in the switches that replace the 1AESS switches at the time of replacement. In addition, BellSouth will continue to comply with the Commission's number management requirements. These requirements will ensure that at the time of replacement, the maximum number of 1000 blocks available for donation will be protected from contamination.

¹ BellSouth's initial review is the first step in preparing its numbering resources for pooling.

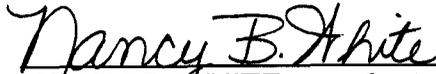
² Non-Contaminated means no telephone numbers have been assigned in the 1000 block.

³ Contaminated means less than 10% or 100 telephone numbers have been assigned in the 1000 block

WHEREFORE, BellSouth requests that the Commission grant its Motion for Variance of Number Pooling Requirement for 1AESS established in Commission Order No. PSC-00-1046-PAA-TP.

Respectfully submitted this 28th Day of July, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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Exhibit 1
Page 1 of 1

NPA	Exchange	Location	Service
407	Orlando	ORLD-Magnolia	1/19/2002
561	Ft. Pierce	Ft. Pierce	10/14/2001
561	Jupiter	Jupiter	12/8/2001
561	Delray Beach	Kings Point	5/11/2002
561	West Palm Beach	Riviera Beach	12/7/2002
561	Delray Beach	Delray Beach Main	12/7/2003
904	Jacksonville Beach	Jacksonville Beach	12/8/2002
904	Jacksonville	JCVL Riverside	12/6/2003
904	Jacksonville	JCVL Lake Forest	12/6/2003
954	Ft. Lauderdale	FTLD-Coral Ridge	3/16/2002
954	Ft. Lauderdale	FTLD-Sunrise	2/12/2002
954	Hollywood	Hallandale	8/01/2003
305/786	Miami	MIAM-West Miami	5/18/2001
305/786	Miami	MIAM-Poinciana	10/13/2001
305/786	Miami	MIAM-Opa Locka	8/17/2002
305/786	Miami	MIAM-Metro	4/1/2003
305/786	Miami	MIAM-Allapattah	10/1/2003
305/786	Miami	MIAM-Bayshore	12/1/2003
305/786	Miami	Miami Shores	7/15/2004

Exchange	NPA	Number of Switches in the Exchange	Number of 1AESS Switches	Number of Non-Contaminated Blocks in 1AESS	Number of Contaminated Blocks in 1AESS	Total Number of Non-Contaminated Blocks	Total Number of Contaminated Blocks
Jacksonville	904	18	2	4	5	14	10
Jacksonville Beach	904	1	1	3	1	3	1
Delray Beach	561	2	2	7	5	7	5
West Palm Beach	561	7	1	1	0	10	10
Jupiter	561	1	1	4	5	4	5
Hollywood	954	4	1	0	0	0	0
Ft. Lauderdale	954	11	2	2	0	3	2