

Sandra Soto

From: Sandra Soto on behalf of Records Clerk
Sent: Tuesday, June 05, 2018 3:41 PM
To: 'theone@uneedus.com'
Cc: Consumer Contact
Subject: RE: Please include in Docket 2018-0118

Good afternoon Mr. Erdmann,

We will be placing your comments below in consumer correspondence in Docket No. 20180118 and forwarding your comments to the Office of Consumer Assistance and Outreach.

Sincerely,

Sandra Soto
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
ssoto@psc.state.fl.us
(850) 413-6010

-----Original Message-----

From: theone@uneedus.com [mailto:theone@uneedus.com]
Sent: Tuesday, June 05, 2018 3:26 PM
To: Records Clerk
Cc: heidi.wayman@team.neustar
Subject: Please include in Docket 2018-0118

Dear Commissioners,

I joined this docket as an interested person, since the proposals being advanced do not address a problem that NANPA has caused to Brevard County.

I do not have an objection to the establishment of a 689 overlay area code in the Orlando Metro area, excluding Brevard County. However, I do ask that the Commission take action as part of this current docket to correct the violation of the Original Orders PSC-02-10404-FOF-TL and PSC-02-743-FOF-TL, by Neustar/NANPA. These Orders assigned all remaining 321-NXX's and any returns for the exclusive use of Brevard County Rate Centers, to extend the life of the 321 NPA in Brevard, including its 7 digit local calling. The action of NANPA took 530,000 numbers away from Brevard.

Neustar, as NANPA administrator after the date of these Orders, continued to issue 321-NXX's to rate centers not in Brevard County in violation of these Orders. These assignments took place after the PSC voted in PSC-03-0188-PAA-TL as a hardship to allow Orlando Health to have 321-842 to expand its hospital network on 2003/02/21 since it already had renumbered all its hospitals into 321-841 and 843 from numerous scattered 407-NXX's and needed more space. This is the first line in the attached spreadsheet of 321-NXX's assigned to rate centers outside of Brevard after the PSC Order to NANPA not to assign any new 321-NXX's outside of Brevard County.

I pointed out this mistake to both NANPA and the Florida PSC last year, and since then, no new 321-NXX's have been assigned to any non-Brevard County Rate Centers. I was told that no action could be done at that point, since recalling them at that point would put NPA 407 into instant jeopardy, since there were not enough remaining NPA 407 codes to move each of the codes in the list into NPA 407.

Now that 407 is again up for area code relief, with a proposed overlay NPA of 689, now is the time to at least put into place a plan to allow recovery of the prefixes reserved for Brevard by the prior order.

I ask that the PSC order that each of the 321-NXX's on the list be reserved in the new NPA 689, so all these numbers can be moved to the new NPA 689 before Brevard needs them in NPA 321. Doing so sooner, rather than the very last minute will allow the intercept recording of a new area code to remain in place longer for benefit of those persons who are the subscribers of these numbers.

The original 98-0671 docket that created the 321 area code to honor the Space Program is very likely the most contested area code in NANPA history with 12,111 comments by the public, of which 12,092 were opposed to being part of an Orlando Metro Overlay, and its associated 10 digit local calling requirement. There were also 5 public hearings in this docket, along with other dockets addressing the Barefoot Bay (Sebastian Rate Center), Osteen (Sanford Rate Center) and Debarry Rate Center issues regarding rate centers near the edges of NPA 407 wanting to move to the main NPA of their County.

Currently the "Industry" in this docket is ONLY the 3 ILEC's in the area.

It also appears that none of the ILEC's received any of the numbers at issue. Unrepresented in this process are the CLEC's, Wireless, and others who use numbering resources indirectly, nor is the public represented in the proposed process by NANPA or at the PSC. Therefore, I ask the PSC to order public meetings regarding NPA 689. Both of the best ideas of docket

98-0671 that established the 321 NPA came from the public meetings.

These were: 1) Asking specifically for the 321 NPA in honor of our space program, and 2) A split of Brevard from the rest of the Orlando Metro Area so that Brevard could retain 7 digit dialing, using its chosen NPA.

My request is to get the PSC to order the recovery of all the numbers that were assigned in violation of prior PSC Orders by NANPA before Brevard needs them. I agree with those 12,092 commenters, during docket 98-0671 who stated they want 7 digit local calling to exist in Brevard County for as long as is possible, and recovery of these numbers will go a long way toward that goal.

Please do not allow the industry to keep the numbers that by order of the PSC are supposed to be for the use of the people of Brevard. Please do consider placing measures in place for their future transfer to Brevard, as was originally decided by the PSC.

Thanks,

Albert Erdmann
Cocoa (Brevard County), Florida.

State	NPA	NXX	Use	OCN	Company Name	Rate Center	Initial/Growth
FL	321	842	AS	9417	BELLSOUTH TELECOMM INC DBA SOUTHERN	ORLANDO	G
FL	321	293	AS	6100	XO FLORIDA, INC.	ORLANDO	G
FL	321	202	AS	7635	LEVEL 3 TELECOM OF FLORIDA, LP - FL	ORLANDO	G
FL	321	332	AS	4802	LEVEL 3 COMMUNICATIONS, LLC - FL	ORLANDO	I
FL	321	558	AS	6664	SPRINT SPECTRUM L.P.	ORLANDO	I
FL	321	972	AS	4227	PAETEC COMMUNICATIONS, INC. - FL	WINTERPARK	I
FL	321	445	AS	6100	XO FLORIDA, INC.	ORLANDO	I
FL	321	926	AS	4802	LEVEL 3 COMMUNICATIONS, LLC - FL	SANFORD	I
FL	321	594	AS	899D	METROPCS NETWORKS, LLC	WINTERPARK	I
FL	321	682	AS	899D	METROPCS NETWORKS, LLC	KISSIMMEE	I
FL	321	746	AS	899D	METROPCS NETWORKS, LLC	KISSIMMEE	G
FL	321	805	AS	899D	METROPCS NETWORKS, LLC	ST CLOUD	I
FL	321	895	AS	899D	METROPCS NETWORKS, LLC	ST CLOUD	G
FL	321	527	AS	6701	AERIAL COMMUNICATIONS	WINTERPARK	I
FL	321	804	AS	927D	BRIGHT HOUSE NTWS INFORMATION SVCS	EASTORANGE	I
FL	321	280	AS	899D	METROPCS NETWORKS, LLC	WINTERPARK	G
FL	321	295	AS	7562	COMCAST PHONE OF FLORIDA, LLC - FL	WINTERPARK	I
FL	321	304	AS	899D	METROPCS NETWORKS, LLC	WINTERPARK	G
FL	321	352	AS	516C	AT&T CORP.	ORLANDO	I
FL	321	325	AS	516C	AT&T CORP.	GENEVA	I
FL	321	500	AS	4227	PAETEC COMMUNICATIONS, INC. - FL	ORLANDO	G
FL	321	247	AS	516C	AT&T CORP.	ORLANDO	G
FL	321	710	AS	4802	LEVEL 3 COMMUNICATIONS, LLC - FL	ORLANDO	G
FL	321	400	AS	6100	XO FLORIDA, INC.	ORLANDO	G
FL	321	300	AS	982E	BANDWIDTH.COM CLEC, LLC - FL	ORLANDO	G
FL	321	200	AS	982E	BANDWIDTH.COM CLEC, LLC - FL	ORLANDO	G
FL	321	800	AS	4802	LEVEL 3 COMMUNICATIONS, LLC - FL	ORLANDO	G
FL	321	236	AS	516C	AT&T CORP.	ORLANDO	G
FL	321	245	AS	516C	AT&T CORP.	ORLANDO	G
FL	321	333	AS	382G	TERRA NOVA TELECOM, INC. - FL	KISSIMMEE	I
FL	321	270	AS	7562	COMCAST PHONE OF FLORIDA, LLC - FL	ORLANDO	I
FL	321	444	AS	382G	TERRA NOVA TELECOM, INC. - FL	WINTERPARK	I
FL	321	888	AS	018A	ASTRO TEL, INC. - FL	ORLANDO	G
FL	321	201	AS	6664	SPRINT SPECTRUM L.P.	ORLANDO	G
FL	321	209	AS	902E	PEERLESS NETWORK OF FLORIDA, LLC - FL	ORLANDO	G
FL	321	203	AS	7575	CENTURYLINK COMMUNICATIONS LLC	WINTERPARK	I
FL	321	732	AS	937C	NEUTRAL TANDEM-FLORIDA, LLC - FL	ORLANDO	G
FL	321	900	AS	937C	NEUTRAL TANDEM-FLORIDA, LLC - FL	KISSIMMEE	I

FL	321	240	AS	965G	LOCAL ACCESS LLC - FL	ORLANDO	I
FL	321	424	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	316	AS	6701	AERIAL COMMUNICATIONS	WINTERPARK	G
FL	321	314	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	315	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	320	AS	6502	CELLCO PARTNERSHIP DBA VERIZON	ORLANDO	G
FL	321	318	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	330	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	430	AS	899D	METROPCS NETWORKS, LLC	ORLANDO	G
FL	321	310	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	440	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	512	AS	6214	NEW CINGULAR WIRELESS PCS, LLC - GA	ORLANDO	G
FL	321	465	AS	937C	NEUTRAL TANDEM-FLORIDA, LLC - FL	ORLANDO	G
FL	321	370	AS	6502	CELLCO PARTNERSHIP DBA VERIZON	WINTERPARK	G
FL	321	347	AS	6889	OMNIPOINT MIAMI E LICENSE, LLC	ORLANDO	G
FL	321	204	AS	937C	NEUTRAL TANDEM-FLORIDA, LLC - FL	ORLANDO	G

Assigned Date	Effective Date	Pooled Code	In Service
2003/02/21		Y	
2004/03/19		Y	
2004/07/07		Y	
2005/04/04		Y	
2005/04/18		Y	
2005/12/28		Y	
2005/12/29		Y	
2005/12/29		Y	
2006/07/13		Y	
2006/08/29		Y	
2006/09/22		Y	
2006/09/27		Y	
2007/03/01		Y	
2007/04/10		Y	
2007/04/10		Y	
2008/10/20		Y	
2009/12/21		Y	
2010/02/09		N	
2010/04/21		Y	
2010/04/23		Y	
2010/10/21		Y	
2010/10/22		Y	
2010/10/26		Y	
2010/11/24		Y	
2011/07/19		Y	
2011/08/04		Y	
2011/08/26		Y	
2011/09/23		Y	
2011/11/03		Y	
2011/11/10		Y	
2011/11/28		Y	
2012/06/01		Y	
2012/07/27		Y	
2013/02/01		Y	
2013/02/05		Y	

2013/02/15	Y
2013/11/21	Y
2013/12/17	Y
2014/08/26	Y
2014/08/26	Y
2014/10/15	Y
2014/11/19	Y
2014/11/19	Y
2014/12/04	Y
2015/01/15	Y
2015/01/15	Y
2015/03/27	Y
2015/08/19	Y
2015/10/15	Y
2015/11/04	Y
2015/11/18	Y