

FLORIDA PUBLIC SERVICE COMMISSION
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MEMORANDUM

March 7, 1996

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)
FROM: DIVISION OF COMMUNICATIONS (GREER, WIDELL) *STG*
DIVISION OF LEGAL SERVICES (HATCH) *RAW*
RE: DOCKET NO. 960090-TL - GENERIC INVESTIGATION INTO DIALING
PLANS THROUGHOUT FLORIDA
AGENDA: MARCH 19, 1996 - REGULAR AGENDA - PROPOSED AGENCY ACTION
- INTERESTED PERSONS MAY PARTICIPATE
CRITICAL DATES: NONE
SPECIAL INSTRUCTIONS: I:\PSC\CMU\WP\960090.RCM

CASE BACKGROUND

At the February 6, 1996 agenda conference, the Commission approved staff's recommendation to initiate an investigation to determine the extent of the problems associated with dialing patterns required by the Commission in Order Nos. PSC-95-1391-FOF-TL, PSC-95-1048-FOF-TL and PSC-96-0123-FOF-TL to delay implementation of the dialing patterns listed in these orders.

On February 19, 1996, staff conducted a workshop to investigate the identified dialing problems resulting from the orders listed above, as well as other problems throughout the state. In addition to addressing the specific dialing problems, staff wanted to develop not only a short-term dialing solution but a long-term solution that carriers could migrate to as problems arise. The following parties attended the workshop:

- | | |
|----------------------|-----------------|
| 1. BellSouth | 6. FPTA |
| 2. FCTA | 7. GTEFL |
| 3. Sprint | 8. MCI |
| 4. Sprint/UTF-Centel | 9. Gulf |
| 5. ALLTEL | 10. Time Warner |

The parties at the workshop discussed basically four concerns with the existing dialing procedures: 1) code conflicts, 2) dialing concerns associated with intraLATA presubscription, 3) customer

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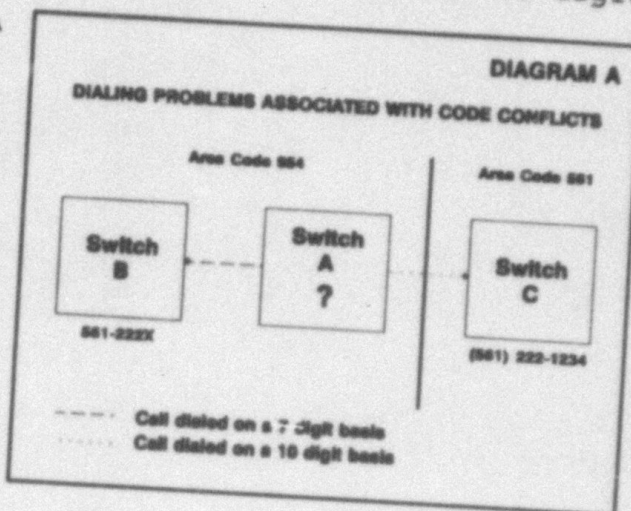
FPSC-RECORDS/REPORTING

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confusion, and 4) a long-term dialing plan for Florida.

Code conflicts arise when a switch, in its processing of the digits dialed by a customer, recognizes that the screening digits (usually the first 3 or 6 digits dialed depending on the type of call) are the same for two different routes. Diagram A provides a pictorial of this situation. In the example shown in Diagram A, the dialing patterns ordered by the Commission require 10-digit dialing for interNPA ECS calls, and 7-digit dialing for intraNPA ECS calls. For this example, Switch A will analyze this type of call by screening the first 6 digits dialed. A code conflict will arise when customer A served by Switch A in Deerfield Beach is required to dial 10-digits, (561) 222-1234, to reach customer B served by Switch B in Boca Raton, but is also able to dial 7-digit, 561-222X, to reach customer C served by Switch C in the Ft. Lauderdale exchange. Since Switch A screens the first 6 digits dialed, 561-222, Switch A will not be able to distinguish between customer B in Boca Raton and customer C in Ft. Lauderdale. The parties at the workshop indicated two ways to correct this code conflict. First, the LEC could introduce delay into Switch A so that the switch would wait to see if customer A is going to dial 7-digits which would route the call to Ft. Lauderdale or 10-digits which would route the call to Boca Raton. This delay could be anywhere from 3 to 8 seconds. Second, Switch A could be provided some indication of how many digits the customer will dial. The easiest way to do this is require Customer A to dial 1 + 10 digits on any call to Boca Raton. The "1" in the telecommunications networks of today indicates to Switch A that the customer will be dialing 10-digits. It should be pointed out that although this example shows a code conflict between an area code and an NXX code, there are circumstances where two NXX codes in different area codes are in conflict. This code conflict between NXX codes usually happens when the local calling scope is extended in some manner such as with ECS.

The dialing concerns associated with the introduction of intraLATA presubscription arise due to the Commission's decisions to allow competition on ECS routes. The parties indicated at the workshop that if a customer chooses the LEC as their intraLATA carrier, in order to get ECS, the customer would be required to



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access another carrier via 10XXX and vice versa. In the workshop, the competitors expressed concern with this scenario, but no party was able to provide a workable solution to correct this problem except for the possibility of allowing resale of ECS.

Another identified concern is that customers may experience some confusion associated with different dialing patterns for the same type of call, such as ECS. Some exchanges have multiple ECS points, and customers could be confused by having to dial one ECS point in one manner and another ECS point in a different manner. If the Commission approves staff's recommendation, there are 21 exchanges that will exhibit this dialing pattern disparity. Attachment A is a list of these exchanges. This customer confusion should be limited a great deal by the use of mechanisms such as customer notices and recorded intercept messages when dialing incorrectly. The only long-term solution to this dialing problem is to migrate the existing dialing patterns of a specific exchange to a consistent dialing pattern for the same types of traffic. This migration should be considered as area code relief proposals are implemented throughout the State or problems arise that justify such a change. Staff recommends the retention of 7-digit dialing as long as possible for local and EAS service. This retention will eventually require most, if not all, ECS calls to be dialed on a 1 + 10 basis.

Going into the workshop, staff believed one of the main objectives for consistency purposes was to develop a long-term dialing solution for carriers to migrate to as the above problems arise. The parties recognized the benefits of a long-term dialing solution and appear to agree, at this time, that the dialing pattern listed below is a workable solution for Florida.

- | | |
|--|---------------|
| 1. Intra Exchange Local | 10-digits |
| 2. Inter and Intra NPA EAS | 10-digits |
| 3. Inter and Intra NPA ECS
or alternative toll plan | 1 + 10 digits |
| 4. Inter and Intra NPA toll | 1 + 10 digits |

It should be noted that this dialing pattern recognizes the move toward 10-digit dialing for all local traffic. Although 10-digit dialing for local traffic may not be necessary for a considerable time in most areas, this long-term dialing pattern should provide a mechanism that can eliminate most, if not all, of the dialing problems listed above with the exception of the concerns associated with intraLATA presubscription, which are not specifically a dialing problem.

Attachment B provides an analysis of the problems associated with each area code.

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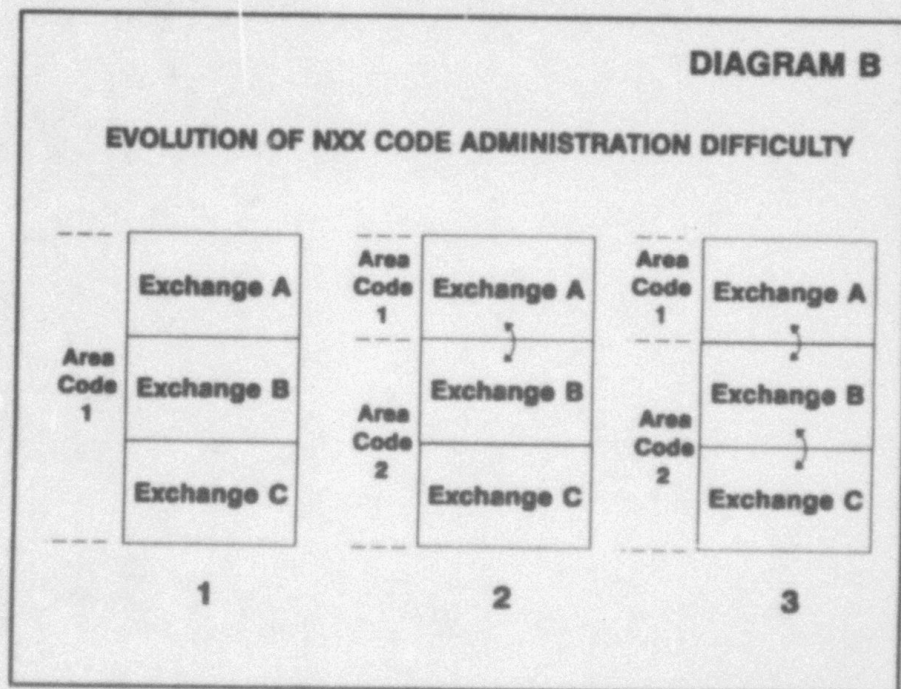
This recommendation will address only the dialing patterns associated with the 284 ECS routes that were implemented via issuance of Order Nos. PSC-95-1391-FOF-TL and PSC-96-0123-FOF-TL, and the dialing patterns implemented via issuance of Order No. PSC-95-1048-FOF-TL, 305 area code relief. Staff believes the conversion of the other dialing patterns throughout the state should evolve to the long-term solution identified above as necessary to eliminate dialing problems.

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ISSUE 1: What dialing pattern should the Commission implement on the ECS routes identified in Order Nos. PSC-95-1391-FOF-TL and PSC-96-0123-FOF-TL?

RECOMMENDATION: The Commission should implement the dialing pattern listed on Attachment C for the ECS routes identified in Order Nos. PSC-95-1391-FOF-TL and PSC-96-0123-FOF-TL.

STAFF ANALYSIS: Before discussing the dialing patterns to implement on the ECS routes identified in the Orders listed above, staff believes it is important to understand the basic concepts behind assignment of central office codes in an ECS environment. Typically, the assignment of central office codes (NXX codes) within a specific area code (intraNPA) does not present a major problem, since most area codes represent a large geographical area that provides the ability to eliminate code conflicts, as discussed in the case background, via strategic code assignments. As area code relief reduces the geographic size of a specific area code, the process to assign NXX codes and retain specific 7-digit dialing patterns becomes more difficult to handle administratively. Eventually, as the geographical area associated with a specific area code is reduced, the local calling scope within an area code can encompass areas served from different area codes. This interNPA traffic requires the code administrator to restrict the assignments within the two area codes so that no NXX code is duplicated in a specific local calling scope. Diagram B depicts the difficult evolution of NXX code administration as area codes become smaller and the local calling scope begins to encompass portions of two area codes. Diagram B-1 shows Area Code 1 that has 3 exchanges, A, B,



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and C, within the area code. Assume for the sake of simplicity that Exchange A (EXH A) and Exchange B (EXH B) have 7-digit local dialing and all other dialing between the exchanges is toll. If the Commission implemented a geographic split, as depicted in Diagram B-2, to provide area code relief for Area Code 1, at the exchange boundary between EXH A and EXH B and wanted to retain 7-digit dialing between these exchanges, the code administrator would have to assign central office codes (NXX codes) in Area Code 1, EXH A, to Area Code 2, exchange C (EXH C) in order to provide NXX codes for growth in EXH C. The only NXX codes that could be used for growth in EXH A would be the NXX codes assigned within a local calling scope and use 7-digit dialing. If the Commission wanted to implement ECS between EXH B and EXH C, as depicted in Diagram B-3, it would be necessary to modify the dialing pattern for either the calling between EXH A and EXH B or EXH B and EXH C due to code conflicts if any NXX codes are duplicated in EXH A and EXH C. The modification to the dialing between exchanges could be as simple as changing the dialing between EXH A and EXH B to 10 or 1 + 10 digit dialing, or changing the dialing between EXH B and EXH C to either 10 or 1 + 10 digit dialing. Although the example discussed above is simple in nature and it may be considered to be a remote possibility, the fact of the matter is, with the implementation of ECS on the 284 BellSouth routes required by the Orders listed above, these problems are real.

Staff believes there are four basic types of traffic that must be considered when addressing dialing patterns, local, EAS, non-optional alternative toll plans and toll. As discussed in the Case Background, staff believes the long-term solution should assume local, including EAS, will migrate from today's 7-digit dialing to 10-digit in the future as is necessary to eliminate code conflicts. As for alternative toll traffic, the Commission generally has implemented this traffic on a 7-digit basis. However, the Commission, within the past few years, has recently implemented ECS on a 10-digit basis. This change in dialing provides relief to the area codes. In addition to the area code problems introduced by implementing ECS, parties in the workshop, as well as in other Commission proceedings, have expressed some concern with the implementation of ECS on what historically have been toll routes, even though the Commission has allowed competition on these routes. Staff does not propose to address the arguments associated with this concern since the Commission has rejected the parties' arguments associated with the potential adverse impacts implementation of ECS would have on competitors. However, with the eventual implementation of intraLATA presubscription, staff believes it is possible for the Commission to introduce dialing parity for this ECS traffic.

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Since it is not imperative to make all of the changes necessary to reach the long-term dialing plan at one time, staff believes the Commission should prioritize the dialing patterns implemented for the different types of traffic listed above. Staff believes that local, as well as EAS, are flat-rated services which do not require an additional charge when making a call; therefore, for these call types, 7-digit dialing should be retained as long as possible. There are some circumstances, that will be discussed in Issue 2, where staff believes it is necessary to migrate the 7-digit dialing to 10-digit dialing for interNPA EAS at this time.

Staff proposes that the Commission implement the dialing patterns listed on Attachment C for the ECS routes identified in Order Nos. PSC-95-1391-FOF-TL and PSC-96-0123-FOF-TL. Prior to the Commission approving these routes for implementation of ECS, the routes were either the Local Calling Plan (LCP) or toll, which were dialed on a 7-digit and 1 + 10 digit basis, respectively. Although staff is concerned with implementing different dialing patterns for the same type of traffic, ECS, staff believes in most instances it would cause more confusion if the Commission required the LCP routes to be dialed on a 1 + 10 digit basis at this time. As indicated in the Case Background, adequate customer notice, as well as recorded intercepts when incorrect dialing occurs, should minimize any customer confusion associated with the different dialing patterns. Staff believes migration of all the LCP plans to 1 + 10 digits should be considered during an area code relief proposal.

At this time, there is only one route, Boynton Beach to Boca Raton, that staff believes the Commission should require BellSouth to notice its customers of the dialing change from the LCP 7-digit dialing to the ECS 1 + 10 digit dialing. This route is the only route in the Southeast LATA that will be an ECS route and is currently dialed on a 7-digit basis. Therefore, for consistency purposes, staff believes it would be less confusing for customers in this exchange, since all other ECS in and around their exchange will be dialed on a 1 + 10 digit basis, and the area is currently in the process of implementing a new area code.

As for the remaining ECS routes that were toll, staff believes it is better not only for the customers but the carriers if the Commission retains the current 1+10 digit dialing for these routes. In most cases, with the possible exception of the Southeast LATA and the DeBary to Orlando route, the Commission could implement 7-digit dialing on these ECS routes. However, with the planned area code relief for 904, 561, and 407 over the next five years and the potential code conflicts that may result as the geographic area associated with these area codes gets smaller, staff believes that retaining the existing 1+10 designation will prevent the Commission

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from having to go from 1+10 to 7 to 1+10 digit dialing at that time. Staff believes this would be more confusing for customers than retaining the 1+10 digit dialing and having a temporary dialing disparity in some of the exchanges throughout the state. In addition to minimizing customer confusion, staff believes the retention of 1+10 digit dialing will introduce dialing parity when intraLATA presubscription is implemented. Eventually, when all alternative toll plans are converted to 1 + 10 digit dialing, customer will be able to distinguish a call that has an additional charge by being required to dial a "1". Staff believes this in the environment the industry is moving will be more beneficial than having a consistent dialing pattern.

Based on the discussions above, staff believes the Commission should require BellSouth to implement the dialing patterns listed on Attachment C.

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ISSUE 2: What dialing patterns should the Commission implement in the Southeast LATA?

RECOMMENDATION: The Commission should implement the following dialing patterns as soon as possible in the Southeast LATA.

1. Local will remain 7-digit dialing
2. EAS between 561 and 954 will remain 7-digit dialing
3. North Dade - Hollywood EAS will be changed from 7-digit dialing to 10-digit dialing
4. All 7-digit ECS routes should change to 1+10 digit dialing while existing 1+10 digit ECS routes should retain 1+10 digit dialing.

Since the paging carriers may have already completed implementation of 10-digit dialing on the Dade-Broward ECS route, BellSouth should give these carriers notice of the dialing change and retain 10 and 1+10 digit dialing on these routes until BellSouth either implements intraLATA presubscription or until January 1, 1997, whichever is sooner. This will provide these carriers sufficient time to notice their customers and modify their networks to recognize 1 + 10 digit dialing on these routes.

STAFF ANALYSIS: The Southeast LATA area codes, by far, have more dialing problems than any other area codes in the state. With the implementation of ECS and, potentially, intraLATA presubscription, staff believes it is practically impossible to implement the ordered dialing patterns for these areas.

At least for now, staff believes the Commission can retain the 7-digit dialing for local calls probably until the next area code relief in that area. However, staff believes the Commission must change the Hollywood - North Dade EAS to 10-digit dialing in order to give relief to the 305 area code. Although staff would normally recommend the EAS routes between the 954 and 561 area codes be changed to 10-digit dialing, at this time it is impossible, without changing telephone numbers in Ft. Lauderdale or introducing network delay, due to a code conflict between an existing NXX code in the Ft. Lauderdale exchange and the new 561 area code. Therefore, staff proposes to retain 7-digit dialing for these routes. Retention of 7-digit dialing on the 954/561 EAS routes will require some careful assignment of NXX codes in these area codes; staff believes the projected life of the 954 area code should allow the code administrator to restrict assignment of conflicting codes until such time as 10-digit dialing for all local traffic is implemented. Once 10-digit dialing is implemented, the conflict

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that currently exists will be eliminated due to the necessity of dialing 10-digits on all local calls.

As discussed in Issue 1, staff believes the Commission should implement the dialing patterns listed on Attachment C as soon as possible. Therefore, staff will not address the dialing for these routes in this issue.

On March 1, 1996, the pager carriers were required to implement mandatory 10-digit dialing for the new 954 area code for the Dade/Broward ECS routes. In this recommendation, staff is proposing the Commission modify that decision to implement 1+10 digit dialing on these routes. Since the Commission is modifying its decision, staff believes the Commission should require BellSouth to retain both 10-digit dialing and 1+10 digit dialing on the Dade/Broward ECS routes until BellSouth implements intraLATA presubscription or until January 1, 1997, whichever is sooner. At that time, BellSouth should implement 1+10 digit dialing on a mandatory basis. Retention of both dialing patterns will provide the pager carriers sufficient time to notice their customers and modify their networks as required.

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ISSUE 3: Should the Commission close this docket?

RECOMMENDATION: Yes, with approval of Issues 1 and 2, this docket should be closed if no protests are filed within 21 days of the issuance of the order.

STAFF ANALYSIS: Yes, with approval of Issues 1 and 2, this docket should be closed if no protests are filed within 21 days of the issuance of the order.

FROM EXCHANGE	LEC NPA	TO EXCHANGE	LEC NPA	EAS TYPE	DIALING
ORLANDO	SBT 407	KISSIMMEE	UTF 407	LCP25	7D
		SAINT CLOUD	UTF 407	LCP25	7D
		WEST KISSIMMEE	UTF 407	LCP25	7D
		DEBARY	SBT 407	ECS	1+10D
		GENEVA	SBT 407	ECS	7D
		SANFORD	SBT 407	ECS	7D
DEBARY	SBT 407	ORLANDO	SBT 407	ECS	1+10D
		WINTER PARK	UTF 407	ECS	7D
SANFORD	SBT 407	ORLANDO	SBT 407	ECS	1+10D
		ORANGE CITY	UTF 904***	LCP25	7D
ARCHER	SBT 352	WILLISTON	UTF 352	LCP25	1+10D
		CEDAR KEY	SBT 352	ECS	7D
		CHIEFLAND	SBT 352	ECS	1+10D
BRONSON	SBT 352	CEDAR KEY	SBT 352	ECS	1+10D
		NEWBERRY	SBT 352	ECS	1+10D
CEDAR KEY	SBT 352	CHIEFLAND	SBT 352	ECS	7D
		BRONSON	SBT 352	ECS	1+10D
		ARCHER	SBT 352	ECS	7D
CHIEFLAND	SBT 352	GAINESVILLE	SBT 352	ECS	7D
		CEDAR KEY	SBT 352	ECS	1+10D
		ARCHER	SBT 352	ECS	1+10D
		GAINESVILLE	SBT 352	ECS	1+10D
		OLD TOWN	SBT 352	ECS	7D
CHIPLEY	SBT 904	BONIFAY	SBT 352	ECS	1+10D
		COTTONDALE	SBT 352	ECS	1+10D
		PANAMA CITY	SBT 352	ECS	1+10D
		YOUNGSTOWN-FNTN	SBT 352	ECS	1+10D
DAYTONA BEACH	SBT 904	NEW SMYRNA	CEN 904	LCP2G	7D
		BUNNELL	CEN 904	LCP20	7D
		DELAND	SBT 904	ECS	1+10D
		FLAGLER BEACH	SBT 904	ECS	1+10D
		OAK HILL	SBT 904	ECS	7D
		PALM COAST	SBT 904	ECS	1+10D
		DELEON SPRINGS	SBT 904	ECS	7D
		PIERSON	SBT 904	ECS	1+10D
GREEN COVE SPRG	SBT 904	SAINT AUGUSTINE	SBT 904	ECS	7D
		PALATKA	SBT 904	ECS	7D
JACKSONVILLE	SBT 904	HILLIARD	ALL 904	ECS	7D
		MACCLENLY	N.E 904	ECS	1+10D
		SANDERSON	N.E 904	LCP25	7D
		FERNANDINA BCH	SBT 904	LCP25	7D
		PALATKA	SBT 904	ECS	1+10D
		SAINT AUGUSTINE	SBT 904	ECS	1+10D

FROM EXCHANGE	LEC	NPA	TO EXCHANGE	LEC	NPA	EAS TYPE	DIALING
JULINGTON	SBT	904	SAINT AUGUSTINE PALATKA	SBT	904	ECS	7D
				SBT	904	ECS	1+10D
LYNN HAVEN	SBT	904	SUNNY HILLS VERNON	SBT	904	ECS	7D
				SBT	904	ECS	1+10D
MILTON	SBT	904	GULF BREEZE HOLLEY NAVARRE	SBT	904	ECS	7D
				SBT	904	ECS	1+10D
PALATKA	SBT	904	CRESCENT CITY GREEN COVE SPRG JACKSONVILLE JULINGTON ORANGE PARK SAINT AUGUSTINE	ALL	904	LCP25	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	1+10D
				SBT	904	ECS	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	7D
PANAMA CITY	SBT	904	SUNNY HILLS CHIPLEY VERNON	SBT	904	ECS	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	1+10D
PIERSON	SBT	904	DAYTONA BEACH NEW SMYRNA OAK HILL BUNNELL FLAGLER BEACH	SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	1+10D
SAINT AUGUSTINE	SBT	904	PONTE VEDRA GREEN COVE SPRG JULINGTON JACKSONVILLE JACKSONVILLE BCH PALATKA	SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	1+10D
				SBT	904	ECS	7D
SUNNY HILLS	SBT	904	LYNN HAVEN PANAMA CITY YOUNGSTOWN-FNTN PANAMA CITY BCH	SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	7D
				SBT	904	ECS	1+10D
VERNON	SBT	904	BONIFAY WESTVILLE LYNN HAVEN PANAMA CITY	CEN	904	LCP20	7D
				CEN	904	LCP20	7D
				SBT	904	ECS	1+10D
				SBT	904	ECS	1+10D
YOUNGSTOWN-FNTN	SBT	904	SUNNY HILLS CHIPLEY	SBT	904	ECS	7D
				SBT	904	ECS	1+10D

ANALYSIS OF AREA CODES

NUMBER OF ONE-WAY ROUTES				2-WAY INTER NPA
	TOTAL	INTRA NPA	INTER NPA	
FLAT RATE EAS	1088	1008	80	40
ECS	362	286	76	38
250 PLAN	113	95	18	9
200 PLAN	129	129	0	0
5 FREE-200	2	2	0	0
TOTAL	1694	1520	174	87

2 WAY ROUTES INTER NPA											
ROUTE TYPE	TOTAL	305 - 954	305 - 561	954 - 561	561 - 407	407 - 352	407 - 904	407 - 941	904 - 352	813 - 941	813 - 352
FLAT RATE EAS	40	1	0	4	1	16	2	2	9	2	3
ECS	38	19	2	11	0	0	0	0	0	6	0
250 PLAN	9	0	0	0	0	2	1	0	6	0	0
TOTAL	87	20	2	15	1	18	3	2	15	8	3

The NXX assignment restrictions due to 7D inter NPA routes were examined in all eight Florida area codes. The conditions for each NPA will be discussed separately.

904 Area Code

The split off of the Gainesville LATA to the new 352 area code changed the following intra NPA EAS routes to inter NPA routes.

904 Area Code

Exchange	LEC	# NXXs
Alachua	ALL	1 -
Alachua	ALL	1 -
Alachua	ALL	1 -
Florahome	ALL	1 -
Hi Springs	ALL	1 -
Hi Springs	ALL	1 -
L. Butler	ALL	1 -
L. Butler	ALL	1 -
Starke	CEN	2 -

352 Area Code

Exchange	LEC	# NXXs
Brooker	ALL	1
Newberry	BST	1
Gainesville	BST	30
Keystone Hgts	BST	1
Gainesville	BST	30
Newberry	BST	1
Brooker	ALL	1
Gainesville	BST	30
Keystone Hgts	BST	1

In addition, two other 7D EAS routes exist between the 904 and 407 area codes.

904 Area Code				407 Area Code			
<u>Exchange</u>	<u>LEC</u>	<u>#</u> <u>NXXs</u>		<u>Exchange</u>	<u>LEC</u>	<u>#</u> <u>NXXs</u>	
Deland	BST	5	-	Debary	BST	3	
Orange City	UTF	6	-	Debary	BST	3	

As can be seen above, none of the 352 NPA exchanges have a large number of NXX codes except Gainesville. Although all of these routes restrict assignments in the exchanges near the Gainesville LATA, there are large areas, like Pensacola and Jacksonville, where the Gainesville area working NXX codes can be assigned. Also, all of the new BellSouth ECS routes in the 904 area code are intra NPA and require no special treatment. In addition, the seven existing 7D inter NPA 25¢ plan routes involve only small exchanges and assignments can be managed with ease.

Therefore, no changes in dialing patterns are required in the 904 area code.

352 Area Code

The nine 7D EAS inter NPA routes to the 905 area code discussed above, do impose some code assignment restrictions in the Gainesville area. However, all of the 904 exchanges are small and the restricted codes can readily be assigned in the Lake and Marion County portions of 352. There are nineteen other 7D EAS inter NPA routes out of the 352 area code (16 to 407 and 3 to 813). These routes also involve only small exchanges and in addition, they have been inter NPA routes for years as 904 routes and assignment controls will continue as before.

813 Area Code

When the 941 area code was split off, two former intra NPA EAS routes changed to inter NPA routes. There are also three inter NPA EAS routes that existed before the split. These five EAS routes which put restrictions on NXX code assignments in 813 are listed below:

<u>NPA</u>	<u>EXCHANGE</u>	<u>LEC</u>	<u>#</u> <u>NXXs</u>	<u>NPA</u>	<u>EXCHANGE</u>	<u>LEC</u>	<u>#</u> <u>NXXs</u>
813	Plant City	GTF	9	941	Lakeland	GTF	31
813	Tampa South	GTF	4	941	Palmetto	GTF	5
813	Zephyrhills	GTF	7	352	San Antonio	UTF	1
813	Zephyrhills	GTF	7	352	Trillacootchee	UTF	1
813	Zephyrhills	GTF	7	352	Dade City	UTF	5

The assignment problems generated by the routes remaining on a 7D basis can be handled for several years.

In addition, the 941 split off created 7D inter NPA ECS routes from the Mulberry exchange to Tampa and Plant City. Because of the size of the Mulberry exchange, 2 NXX codes, these assignment restrictions can also be handled in the 813 area code.

Therefore, there is no immediate need to change the present dialing pattern of 7D calling on all NPA EAS and ECS routes.

941 Area Code

In addition to the 941-813 routes discussed above, there are two 941-407 inter NPA 7D EAS routes. These are from Haines City - Poinciana to Kissimmee and West Kissimmee. The Haines City exchange has only 5 working NXX codes and the restrictions pose no problems that can not be managed easily. The 941-813 route restrictions can be handled easily also.

407 Area Code

The 407 area code has 20 inter NPA 7D EAS routes. Eighteen of these were existing between 407 and 904 before any new area codes were created. These 18 routes have not caused any unmanageable assignment restrictions because of the small size of the exchanges involved. Eleven routes involve the Montverde exchange (1 NXX) and five are from Clermont (3 NXX). The other two routes are from Debary to Orange City and Deland. There are two routes to Haines City discussed above under 941 which also cause very minor restrictions in the 407 area code.

There are no inter NPA ECS routes from the 407 NPA. However, there are three 25¢ plan inter NPA routes that cause minor assignment problems (Mt. Dora - Apopka, Mt. Dora - Winter Park and Orange City-Sanford).

SOUTHEAST LATA AREA CODES

The remaining three area codes (305, 954 and 561) are all in the Southeast LATA where most of the dialing pattern problems exist today. The ECS routes implemented in the Southeast LATA are shown below by area codes.

	<u>305</u>	<u>954</u>	<u>561</u>
305	36	19	2
954	19	3	11
561	2	11	25

The large number of inter NPA ECS routes (32) involved in these three area codes prohibits establishing them on a 7D basis. For example, every exchange in the 954 NPA has ECS routes to both 561 and 305 and all the exchanges are large. In addition, there are existing code conflicts that make 7D calling impossible without large scale number changes. All of these routes were toll, 1+10D, routes before ECS was implemented and should continue on a 1+10D basis.

In addition, 64 two-way intra NPA ECS routes were implemented in January 1996. Having these routes on a 7D basis would also cause NXX code assignment problems that would be next to impossible to manage and 1+10D calling is recommended on these routes. All of these routes except Boynton Beach - Boca Raton were toll routes before ECS and should continue 1+10D dialing. The Boynton Beach route was a 25¢ plan 7D route and should be changed to 1+10D to avoid confusion. Nine ECS routes were implemented from the Boynton Beach exchange to other exchanges in BellSouth's 284 ECS route proposal. At present, eight are 1+10D and only the Boca Raton route is 7D.

In addition to the ECS routes there are six 2 way 7D inter NPA flat rate EAS routes in the Southeast LATA.

<u>NPA</u>	<u>EXCHANGE</u>	<u>#</u> <u>NXXs</u>	<u>NPA</u>	<u>EXCHANGE</u>	<u>#</u> <u>NXXs</u>
305	North Dade	67	954	Hollywood	38
954	Coral Spgs	9	561	Boca Raton	40
954	Deerfield Bch	22	561	Boca Raton	40
954	Deerfield Bch	22	561	Delray Beach	20
954	Pompano Bch	30	561	Boca Raton	40
561	Sebastian	6	407	Melbourne	14

The 7D EAS route between North Dade and Hollywood causes large numbers of NXX code assignment problems in both 305 and 954. This is due to the fact that Hollywood also has 7D EAS to Ft. Lauderdale and North Dade has 7D EAS to Miami and Perrine. This combination of inter and intra NPA routes would result in the following assignment restrictions.

<u>WORKING CODES IN</u>			<u>CAN NOT BE USED IN</u>		
<u>NPA</u>	<u>EXCHANGE</u>	<u>#</u> <u>NXXs</u>	<u>NPA</u>	<u>EXCHANGE</u>	<u>#</u> <u>NXXs</u>
305	North Dade	67	954	Hollywood	38
305	North Dade	67	954	Ft. Lauderdale	178
954	Hollywood	38	305	North Dade	67
954	Hollywood	38	305	Miami	335
954	Hollywood	38	305	Perrine	17

It can be seen from the information listed above that the 38 working codes in Hollywood could only be used for growth in Homestead and the Keys, and only working codes in Homestead and the Keys could be used for growth codes in Hollywood. Since the 38 Hollywood codes are far more than will be required in Homestead and the Keys, many of them would not be usable in 305. This would shorten the life of the 305 NPA. This alone is reason enough to convert the North Dade - Hollywood route from 7D to 10D. If this route is changed to 10D and the ECS routes are all 1+10D as recommended above, there would be no NXX assignment restrictions in the 305 NPA.

If the four 7D inter NPA EAS routes between the 954 and 561 area codes listed above remain on a 7D basis, the following restrictions will result.

WORKING CODES IN			CANNOT BE USED IN		
NPA	EXCHANGE	# NXXs	NPA	EXCHANGE	# NXXs
561	Boca Raton	40	954	Coral Springs	9
561	Boca Raton	40	954	Deerfield Beach	22
561	Boca Raton	40	954	Pompano Beach	30
561	Boca Raton	40	954	Ft Lauderdale	178
561	Delray Bch	20	954	Coral Springs	9
561	Delray Bch	20	954	Deerfield Beach	22
561	Delray Bch	20	954	Pompano Beach	30

The 40 Boca Raton working codes can be used for growth in Hollywood, and the 20 Delray Beach codes can be used for growth in Ft. Lauderdale. If this assignment scheme is followed, there should be few if any unusable codes in the 954 area code. Changing the dialing on these four routes from 7D to 10D would eliminate the restrictions in the 954 area code but would introduce delay on a large number of local calls in the Ft. Lauderdale area. This delay problem would result because 561, the new area code for the north portion of the Southeast LATA, is also a working NXX code in Ft. Lauderdale. Therefore, it is recommended that the four 7D routes in question continue on a 7D basis.

Assignments in the 561 area code can be managed since codes restricted from Boca Raton and Delray Beach can be used in the West Palm Beach exchange and the north portion of the 561 area code.

The one 7D EAS route between the 561 and 407 NPAs, Sebastian - Melbourne, causes only minor assignment restrictions in the 561 area code which can be easily handled.

SBT--SBT ECS ROUTES

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	FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
1	ARCHER	352	CEDAR KEY	352	MTS 1+10D	1+10D
2	ARCHER	352	CHIEFLAND	352	MTS 1+10D	1+10D
3	BELLE GLADE	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
4	BELLE GLADE	561	BOCA RATON	561	MTS 1+10D	1+10D
5	BELLE GLADE	561	BOYNTON BEACH	561	MTS 1+10D	1+10D
6	BELLE GLADE	561	DELRAY BEACH	561	MTS 1+10D	1+10D
7	BELLE GLADE	561	JUPITER	561	MTS 1+10D	1+10D
8	BIG PINE KEY	305	HOMESTEAD	305	MTS 1+10D	1+10D
9	BIG PINE KEY	305	ISLAMORADA	305	MTS 1+10D	1+10D
10	BIG PINE KEY	305	KEY LARGO	305	MTS 1+10D	1+10D
11	BIG PINE KEY	305	MIAMI	305	MTS 1+10D	1+10D
12	BIG PINE KEY	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
13	BIG PINE KEY	305	PERRINE	305	MTS 1+10D	1+10D
14	BOCA RATON	561	FORT LAUDERDALE	954 ***	MTS 1+10D	1+10D
15	BOCA RATON	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
16	BOCA RATON	561	BOYNTON BEACH	561	LCP 7D	1+10D
17	BOCA RATON	561	HOLLYWOOD	954 ***	MTS 1+10D	1+10D
18	BOCA RATON	561	MIAMI	305 ***	MTS 1+10D	1+10D
19	BOCA RATON	561	NORTH DADE	305 ***	MTS 1+10D	1+10D
20	BOCA RATON	561	BELLE GLADE	561	MTS 1+10D	1+10D
21	BOCA RATON	561	JUPITER	561	MTS 1+10D	1+10D
22	BOCA RATON	561	PAHOKEE	561	MTS 1+10D	1+10D
23	BOYNTON BEACH	561	BOCA RATON	561	MTS 1+10D	1+10D
24	BOYNTON BEACH	561	BELLE GLADE	561	LCP 7D	1+10D
25	BOYNTON BEACH	561	JUPITER	561	MTS 1+10D	1+10D
26	BOYNTON BEACH	561	PAHOKEE	561	MTS 1+10D	1+10D
27	BOYNTON BEACH	561	FORT LAUDERDALE	561	MTS 1+10D	1+10D
28	BOYNTON BEACH	561	DEERFIELD BEACH	954 ***	MTS 1+10D	1+10D
29	BOYNTON BEACH	561	POMPAÑO BEACH	954 ***	MTS 1+10D	1+10D
30	BOYNTON BEACH	561	CORAL SPRINGS	954 ***	MTS 1+10D	1+10D
31	BOYNTON BEACH	561	HOLLYWOOD	954 ***	MTS 1+10D	1+10D
32	BRONSON	352	CEDAR KEY	352	LCP 7D	7D
33	BRONSON	352	NEWBERRY	352	MTS 1+10D	1+10D
34	BUNNELL	904	DAYTONA BEACH	904	MTS 1+10D	1+10D
35	BUNNELL	904	PIERSON	904	MTS 1+10D	1+10D
36	CEDAR KEY	352	CHIEFLAND	352	LCP 7D	7D
37	CEDAR KEY	352	BRONSON	352	LCP 7D	7D
38	CEDAR KEY	352	ARCHER	352	MTS 1+10D	1+10D
39	CEDAR KEY	352	GAINESVILLE	352	MTS 1+10D	1+10D
40	CHIEFLAND	352	CEDAR KEY	352	LCP 7D	7D
41	CHIEFLAND	352	ARCHER	352	MTS 1+10D	1+10D
42	CHIEFLAND	352	GAINESVILLE	352	MTS 1+10D	1+10D
43	CHIEFLAND	352	OLD TOWN	352	MTS 1+10D	1+10D
44	CHIPLEY	904	PANAMA CITY	904	MTS 1+10D	1+10D
45	CHIPLEY	904	YOUNGSTOWN-FNTN	904	MTS 1+10D	1+10D
46	CORAL SPRINGS	954	DELRAY BEACH	561 ***	MTS 1+10D	1+10D
47	CORAL SPRINGS	954	HOLLYWOOD	954	MTS 1+10D	1+10D
48	CORAL SPRINGS	954	HOMESTEAD	305 ***	MTS 1+10D	1+10D
49	CORAL SPRINGS	954	MIAMI	305 ***	MTS 1+10D	1+10D
50	CORAL SPRINGS	954	NORTH DADE	305 ***	MTS 1+10D	1+10D

*** Indicates an interNPA route

SBT--SBT ECS ROUTES (CONTINUED)

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FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
51 CORAL SPRINGS	---	---	---	---	---
52 CORAL SPRINGS	954	PERRINE	---	---	---
53 DAYTONA BEACH	954	BOYNTON BEACH	305 ***	MTS 1+10D	1+10D
54 DAYTONA BEACH	904	NEW SMYRNA	561 ***	MTS 1+10D	1+10D
55 DAYTONA BEACH	904	BUNNELL	904	LCP 7D	7D
56 DAYTONA BEACH	904	DELAND	904	MTS 1+10D	1+10D
57 DAYTONA BEACH	904	FLAGLER BEACH	904	LCP 7D	7D
58 DAYTONA BEACH	904	OAK HILL	904	MTS 1+10D	1+10D
59 DAYTONA BEACH	904	PALM COAST	904	LCP 7D	7D
60 DAYTONA BEACH	904	DELEON SPRINGS	904	MTS 1+10D	1+10D
61 DEBARY	904	PIERSON	904	LCP 7D	7D
62 DEERFIELD BEACH	407	ORLANDO	904	MTS 1+10D	1+10D
63 DEERFIELD BEACH	954	HOLLYWOOD	904	LCP 7D	7D
64 DEERFIELD BEACH	954	HOMESTEAD	407	LCP 7D	7D
65 DEERFIELD BEACH	954	MIAMI	954	MTS 1+10D	1+10D
66 DEERFIELD BEACH	954	NORTH DADE	305 ***	MTS 1+10D	1+10D
67 DEERFIELD BEACH	954	PERRINE	305 ***	MTS 1+10D	1+10D
68 DELAND	954	BOYNTON BEACH	305 ***	MTS 1+10D	1+10D
69 DELAND	904	DAYTONA BEACH	305 ***	MTS 1+10D	1+10D
70 DELAND	904	NEW SMYRNA	561 ***	MTS 1+10D	1+10D
71 DELEON SPRINGS	904	OAK HILL	904	LCP 7D	7D
72 DELEON SPRINGS	904	DAYTONA BEACH	904	LCP 7D	7D
73 DELEON SPRINGS	904	NEW SMYRNA	904	LCP 7D	7D
74 DELRAY BEACH	904	OAK HILL	904	LCP 7D	7D
75 DELRAY BEACH	561	CORAL SPRINGS	904	LCP 7D	7D
76 DELRAY BEACH	561	FORT LAUDERDALE	904	LCP 7D	7D
77 DELRAY BEACH	561	POMPAÑO BEACH	954 ***	MTS 1+10D	1+10D
78 DELRAY BEACH	561	WEST PALM BEACH	954 ***	MTS 1+10D	1+10D
79 DELRAY BEACH	561	BELLE GLADE	561	MTS 1+10D	1+10D
80 DELRAY BEACH	561	JUPITER	561	MTS 1+10D	1+10D
81 DELRAY BEACH	561	PAHOKEE	561	MTS 1+10D	1+10D
82 EAU GALLIE	561	HOLLYWOOD	561	MTS 1+10D	1+10D
83 FERNANDINA BCH	407	TITUSVILLE	561	MTS 1+10D	1+10D
84 FERNANDINA BCH	904	FORT GEORGE	954 ***	MTS 1+10D	1+10D
85 FLAGLER BEACH	904	JACKSONVILLE	407	MTS 1+10D	1+10D
86 FLAGLER BEACH	904	DAYTONA BEACH	904	MTS 1+10D	1+10D
87 FORT GEORGE	904	PIERSON	904	MTS 1+10D	1+10D
88 FORT GEORGE	904	FERNANDINA BCH	904	MTS 1+10D	1+10D
89 FORT LAUDERDALE	904	JACKSONVILLE BCH	904	MTS 1+10D	1+10D
90 FORT LAUDERDALE	954	BOCA RATON	904	MTS 1+10D	1+10D
91 FORT LAUDERDALE	954	BOYNTON BEACH	561 ***	MTS 1+10D	1+10D
92 FORT LAUDERDALE	954	DELRAY BEACH	561 ***	MTS 1+10D	1+10D
93 FORT LAUDERDALE	954	HOMESTEAD	561 ***	MTS 1+10D	1+10D
94 FORT PIERCE	954	PERRINE	305 ***	MTS 1+10D	1+10D
95 FORT PIERCE	561	JENSEN BEACH	305 ***	MTS 1+10D	1+10D
96 GAINESVILLE	561	VERO BEACH	561	MTS 1+10D	1+10D
97 GAINESVILLE	352	CEDAR KEY	561	MTS 1+10D	1+10D
98 GAINESVILLE	352	CHIEFLAND	352	MTS 1+10D	1+10D
99 GREEN COVE SPRG	352	KEYSTONE HGTS	352	MTS 1+10D	1+10D
100 GULF BREEZE	904	PALATKA	904	LCP 7D	7D
		MILTON	904	MTS 1+10D	1+10D
				MTS 1+10D	1+10D

*** Indicates an interNPA route

SBT--SBT ECS ROUTES (CONTINUED)

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FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
101 HOBE SOUND	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
102 HOLLEY NAVARRE	904	PACE	904	MTS 1+10D	1+10D
103 HOLLEY NAVARRE	904	MILTON	904	MTS 1+10D	1+10D
104 HOLLYWOOD	954	BOCA RATON	561 ***	MTS 1+10D	1+10D
105 HOLLYWOOD	954	CORAL SPRINGS	954	MTS 1+10D	1+10D
106 HOLLYWOOD	954	DEERFIELD BEACH	954	MTS 1+10D	1+10D
107 HOLLYWOOD	954	HOMESTEAD	954	MTS 1+10D	1+10D
108 HOLLYWOOD	954	PERRINE	305 ***	MTS 1+10D	1+10D
109 HOLLYWOOD	954	POMPANO BEACH	305 ***	MTS 1+10D	1+10D
110 HOLLYWOOD	954	BOYNTON BEACH	954	MTS 1+10D	1+10D
111 HOLLYWOOD	954	DELRAY BEACH	561 ***	MTS 1+10D	1+10D
112 HOMESTEAD	305	BIG PINE KEY	561 ***	MTS 1+10D	1+10D
113 HOMESTEAD	305	CORAL SPRINGS	305	MTS 1+10D	1+10D
114 HOMESTEAD	305	DEERFIELD BEACH	954 ***	MTS 1+10D	1+10D
115 HOMESTEAD	305	FORT LAUDERDALE	954 ***	MTS 1+10D	1+10D
116 HOMESTEAD	305	HOLLYWOOD	954 ***	MTS 1+10D	1+10D
117 HOMESTEAD	305	ISLAMORADA	954 ***	MTS 1+10D	1+10D
118 HOMESTEAD	305	KEY LARGO	305	MTS 1+10D	1+10D
119 HOMESTEAD	305	KEY WEST	305	MTS 1+10D	1+10D
120 HOMESTEAD	305	MARATHON	305	MTS 1+10D	1+10D
121 HOMESTEAD	305	NORTH DADE	305	MTS 1+10D	1+10D
122 HOMESTEAD	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
123 HOMESTEAD	305	POMPANO BEACH	305	MTS 1+10D	1+10D
124 HOMESTEAD	305	SUGARLOAF	954 ***	MTS 1+10D	1+10D
125 ISLAMORADA	305	BIG PINE KEY	305	MTS 1+10D	1+10D
126 ISLAMORADA	305	HOMESTEAD	305	MTS 1+10D	1+10D
127 ISLAMORADA	305	KEY WEST	305	MTS 1+10D	1+10D
128 ISLAMORADA	305	MIAMI	305	MTS 1+10D	1+10D
129 ISLAMORADA	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
130 ISLAMORADA	305	PERRINE	305	MTS 1+10D	1+10D
131 ISLAMORADA	305	SUGARLOAF	305	MTS 1+10D	1+10D
132 JACKSONVILLE	904	FERNANDINA BCH	904	MTS 1+10D	1+10D
133 JACKSONVILLE	904	PALATKA	904	MTS 1+10D	1+10D
134 JACKSONVILLE	904	SAINT AUGUSTINE	904	MTS 1+10D	1+10D
135 JACKSONVILLE BCH	904	FORT GEORGE	904	MTS 1+10D	1+10D
136 JACKSONVILLE BCH	904	SAINT AUGUSTINE	904	MTS 1+10D	1+10D
137 JENSEN BEACH	561	FORT PIERCE	904	MTS 1+10D	1+10D
138 JENSEN BEACH	561	JUPITER	561	MTS 1+10D	1+10D
139 JENSEN BEACH	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
140 JULINGTON	904	PALATKA	904	MTS 1+10D	1+10D
141 JUPITER	561	JENSEN BEACH	561	MTS 1+10D	1+10D
142 JUPITER	561	PORT ST. LUCIE	561	MTS 1+10D	1+10D
143 JUPITER	561	STUART	561	MTS 1+10D	1+10D
144 JUPITER	561	BELLE GLADE	561	MTS 1+10D	1+10D
145 JUPITER	561	BOCA RATON	561	MTS 1+10D	1+10D
146 JUPITER	561	BOYNTON BEACH	561	MTS 1+10D	1+10D
147 JUPITER	561	DELRAY BEACH	561	MTS 1+10D	1+10D
148 JUPITER	561	PAHOKEE	561	MTS 1+10D	1+10D
149 KEY LARGO	305	BIG PINE KEY	561	MTS 1+10D	1+10D
150 KEY LARGO	305	HOMESTEAD	305	MTS 1+10D	1+10D

*** Indicates an interNPA route

SBT--SBT ECS ROUTES (CONTINUED)

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FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
151 KEY LARGO	---	KEY WEST	---	---	---
152 KEY LARGO	305	MARATHON	305	MTS 1+10D	1+10D
153 KEY LARGO	305	MIAMI	305	MTS 1+10D	1+10D
154 KEY LARGO	305	PERRINE	305	MTS 1+10D	1+10D
155 KEY LARGO	305	SUGARLOAF	305	MTS 1+10D	1+10D
156 KEY WEST	305	HOMESTEAD	305	MTS 1+10D	1+10D
157 KEY WEST	305	ISLAMORADA	305	MTS 1+10D	1+10D
158 KEY WEST	305	KEY LARGO	305	MTS 1+10D	1+10D
159 KEY WEST	305	MARATHON	305	MTS 1+10D	1+10D
160 KEY WEST	305	MIAMI	305	MTS 1+10D	1+10D
161 KEY WEST	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
162 KEY WEST	305	PERRINE	305	MTS 1+10D	1+10D
163 KEYSTONE HGTS	352	GAINESVILLE	305	MTS 1+10D	1+10D
164 LYNN HAVEN	904	SUNNY HILLS	352	MTS 1+10D	1+10D
165 LYNN HAVEN	904	VERNON	904	LCP 7D	7D
166 MARATHON	305	HOMESTEAD	904	LCP 7D	7D
167 MARATHON	305	KEY LARGO	305	MTS 1+10D	1+10D
168 MARATHON	305	KEY WEST	305	MTS 1+10D	1+10D
169 MARATHON	305	MIAMI	305	MTS 1+10D	1+10D
170 MARATHON	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
171 MARATHON	305	PERRINE	305	MTS 1+10D	1+10D
172 MARATHON	305	SUGARLOAF	305	MTS 1+10D	1+10D
173 MELBOURNE	407	TITUSVILLE	305	MTS 1+10D	1+10D
174 MIAMI	305	BIG PINE KEY	407	MTS 1+10D	1+10D
175 MIAMI	305	BOCA RATON	305	MTS 1+10D	1+10D
176 MIAMI	305	CORAL SPRINGS	561 ***	MTS 1+10D	1+10D
177 MIAMI	305	DEERFIELD BEACH	954 ***	MTS 1+10D	1+10D
178 MIAMI	305	ISLAMORADA	954 ***	MTS 1+10D	1+10D
179 MIAMI	305	KEY LARGO	305	MTS 1+10D	1+10D
180 MIAMI	305	KEY WEST	305	MTS 1+10D	1+10D
181 MIAMI	305	MARATHON	305	MTS 1+10D	1+10D
182 MIAMI	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
183 MIAMI	305	POMPAÑO BEACH	305	MTS 1+10D	1+10D
184 MIAMI	305	SUGARLOAF	954 ***	MTS 1+10D	1+10D
185 MILTON	904	GULF BREEZE	305	MTS 1+10D	1+10D
186 MILTON	904	HOLLEY NAVARRE	904	MTS 1+10D	1+10D
187 NEW SMYRNA	904	DAYTONA BEACH	904	MTS 1+10D	1+10D
188 NEW SMYRNA	904	DELAND	904	LCP 7D	7D
189 NEW SMYRNA	904	DELEON SPRINGS	904	LCP 7D	7D
190 NEW SMYRNA	904	PIERSON	904	LCP 7D	7D
191 NEWBERRY	352	BRONSON	904	LCP 7D	7D
192 NORTH DADE	305	BOCA RATON	352	MTS 1+10D	1+10D
193 NORTH DADE	305	CORAL SPRINGS	561 ***	MTS 1+10D	1+10D
194 NORTH DADE	305	DEERFIELD BEACH	954 ***	MTS 1+10D	1+10D
195 NORTH DADE	305	HOMESTEAD	954 ***	MTS 1+10D	1+10D
196 NORTH DADE	305	POMPAÑO BEACH	305	MTS 1+10D	1+10D
197 NORTH KEY LARGO	305	BIG PINE KEY	954 ***	MTS 1+10D	1+10D
198 NORTH KEY LARGO	305	HOMESTEAD	305	MTS 1+10D	1+10D
199 NORTH KEY LARGO	305	ISLAMORADA	305	MTS 1+10D	1+10D
200 NORTH KEY LARGO	305	KEY WEST	305	MTS 1+10D	1+10D

*** Indicates an interNPA route

	FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
201	NORTH KEY LARGO	305	MARATHON	305	MTS 1+10D	1+10D
202	NORTH KEY LARGO	305	MIAMI	305	MTS 1+10D	1+10D
203	NORTH KEY LARGO	305	PERRINE	305	MTS 1+10D	1+10D
204	NORTH KEY LARGO	305	SUGARLOAF	305	MTS 1+10D	1+10D
205	OAK HILL	904	DAYTONA BEACH	904	LCP 7D	7D
206	OAK HILL	904	DELAND	904	LCP 7D	7D
207	OAK HILL	904	DELEON SPRINGS	904	LCP 7D	7D
208	OAK HILL	904	PIERSON	904	LCP 7D	7D
209	OLD TOWN	352	CHIEFLAND	352	MTS 1+10D	1+10D
210	ORANGE PARK	904	PALATKA	904	MTS 1+10D	1+10D
211	ORLANDO	407	DEBARY	407	MTS 1+10D	1+10D
212	PACE	904	HOLLEY NAVARRE	904	MTS 1+10D	1+10D
213	PAHOKEE	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
214	PAHOKEE	561	BOCA RATON	561	MTS 1+10D	1+10D
215	PAHOKEE	561	BOYNTON BEACH	561	MTS 1+10D	1+10D
216	PAHOKEE	561	DELRAY BEACH	561	MTS 1+10D	1+10D
217	PAHOKEE	561	JUPITER	561	MTS 1+10D	1+10D
218	PALATKA	904	GREEN COVE SPRG	904	MTS 1+10D	1+10D
219	PALATKA	904	JACKSONVILLE	904	MTS 1+10D	1+10D
220	PALATKA	904	JULINGTON	904	MTS 1+10D	1+10D
221	PALATKA	904	ORANGE PARK	904	MTS 1+10D	1+10D
222	PALM COAST	904	DAYTONA BEACH	904	MTS 1+10D	1+10D
223	PANAMA CITY	904	SUNNY HILLS	904	LCP 7D	7D
224	PANAMA CITY	904	CHIPLEY	904	MTS 1+10D	1+10D
225	PANAMA CITY	904	VERNON	904	MTS 1+10D	1+10D
226	PANAMA CITY BCH	904	SUNNY HILLS	904	MTS 1+10D	1+10D
227	PERRINE	305	CORAL SPRINGS	954 ***	MTS 1+10D	1+10D
228	PERRINE	305	DEERFIELD BEACH	954 ***	MTS 1+10D	1+10D
229	PERRINE	305	FORT LAUDERDALE	954 ***	MTS 1+10D	1+10D
230	PERRINE	305	HOLLYWOOD	954 ***	MTS 1+10D	1+10D
231	PERRINE	305	ISLAMORADA	305	MTS 1+10D	1+10D
232	PERRINE	305	KEY LARGO	305	MTS 1+10D	1+10D
233	PERRINE	305	KEY WEST	305	MTS 1+10D	1+10D
234	PERRINE	305	MARATHON	305	MTS 1+10D	1+10D
235	PERRINE	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
236	PERRINE	305	POMPANO BEACH	954 ***	MTS 1+10D	1+10D
237	PERRINE	305	SUGARLOAF	305	MTS 1+10D	1+10D
238	PERRINE	305	BIG PINE KEY	305	MTS 1+10D	1+10D
239	PIERSON	904	DAYTONA BEACH	904	LCP 7D	7D
240	PIERSON	904	NEW SMYRNA	904	LCP 7D	7D
241	PIERSON	904	OAK HILL	904	LCP 7D	7D
242	PIERSON	904	BUNNELL	904	MTS 1+10D	1+10D
243	PIERSON	904	FLAGLER BEACH	904	MTS 1+10D	1+10D
244	POMPANO BEACH	954	DELRAY BEACH	561 ***	MTS 1+10D	1+10D
245	POMPANO BEACH	954	HOLLYWOOD	954	MTS 1+10D	1+10D
246	POMPANO BEACH	954	HOMESTEAD	305 ***	MTS 1+10D	1+10D
247	POMPANO BEACH	954	MIAMI	305 ***	MTS 1+10D	1+10D
248	POMPANO BEACH	954	NORTH DADE	305 ***	MTS 1+10D	1+10D
249	POMPANO BEACH	954	PERRINE	305 ***	MTS 1+10D	1+10D
250	POMPANO BEACH	954	BOYNTON BEACH	561 ***	MTS 1+10D	1+10D

*** Indicates an interNPA route

SBT--SBT ECS ROUTES (CONTINUED)

Attachment C
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FROM EXCHANGE	NPA	TO EXCHANGE	NPA	WAS	PROPOSED
251 PONTE VEDRA	904	SAINT AUGUSTINE	904	MTS 1+10D	1+10D
252 PORT ST. LUCIE	561	JUPITER	561	MTS 1+10D	1+10D
253 PORT ST. LUCIE	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
254 SAINT AUGUSTINE	904	PONTE VEDRA	904	LCP 7D	7D
255 SAINT AUGUSTINE	904	JACKSONVILLE	904	MTS 1+10D	1+10D
256 SAINT AUGUSTINE	904	JACKSONVILLE BCH	904	MTS 1+10D	1+10D
257 STUART	561	JUPITER	561	MTS 1+10D	1+10D
258 STUART	561	WEST PALM BEACH	561	MTS 1+10D	1+10D
259 SUGARLOAF	305	HOMESTEAD	305	MTS 1+10D	1+10D
260 SUGARLOAF	305	ISLAMORADA	305	MTS 1+10D	1+10D
261 SUGARLOAF	305	KEY LARGO	305	MTS 1+10D	1+10D
262 SUGARLOAF	305	MARATHON	305	MTS 1+10D	1+10D
263 SUGARLOAF	305	MIAMI	305	MTS 1+10D	1+10D
264 SUGARLOAF	305	NORTH KEY LARGO	305	MTS 1+10D	1+10D
265 SUGARLOAF	305	PERRINE	305	MTS 1+10D	1+10D
266 SUNNY HILLS	904	LYNN HAVEN	904	MTS 1+10D	1+10D
267 SUNNY HILLS	904	PANAMA CITY	904	LCP 7D	7D
268 SUNNY HILLS	904	YOUNGSTOWN-FNTN	904	LCP 7D	7D
269 SUNNY HILLS	904	PANAMA CITY BCH	904	LCP 7D	7D
270 TITUSVILLE	407	EAU GALLIE	407	MTS 1+10D	1+10D
271 TITUSVILLE	407	MELBOURNE	407	MTS 1+10D	1+10D
272 VERNON	904	LYNN HAVEN	904	MTS 1+10D	1+10D
273 VERNON	904	PANAMA CITY	904	MTS 1+10D	1+10D
274 VERO BEACH	561	FORT PIERCE	561	MTS 1+10D	1+10D
275 WEST PALM BEACH	561	BOCA RATON	561	MTS 1+10D	1+10D
276 WEST PALM BEACH	561	DELRAY BEACH	561	MTS 1+10D	1+10D
277 WEST PALM BEACH	561	BELLE GLADE	561	MTS 1+10D	1+10D
278 WEST PALM BEACH	561	HOBE SOUND	561	MTS 1+10D	1+10D
279 WEST PALM BEACH	561	JENSEN BEACH	561	MTS 1+10D	1+10D
280 WEST PALM BEACH	561	PAHOKEE	561	MTS 1+10D	1+10D
281 WEST PALM BEACH	561	PORT ST. LUCIE	561	MTS 1+10D	1+10D
282 WEST PALM BEACH	561	STUART	561	MTS 1+10D	1+10D
283 YOUNGSTOWN-FNTN	904	SUNNY HILLS	904	LCP 7D	7D
284 YOUNGSTOWN-FNTN	904	CHIPLEY	904	MTS 1+10D	1+10D

284 TOTAL ROUTES. 58 INTER-NPA ROUTES

*** Indicates an interNPA route