

FLORIDA PUBLIC SERVICE COMMISSION
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MEMORANDUM

January 25, 1996

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)
 FROM: DIVISION OF COMMUNICATIONS (GREER) *576*
 DIVISION OF LEGAL SERVICES (HATCH) *TH*
 RE: DOCKET NO. 960090-TP - GENERIC INVESTIGATION INTO DIALING
 PLANS THROUGHOUT FLORIDA -
 AGENDA: FEBRUARY 6, 1996 - REGULAR AGENDA - INTERESTED PERSONS
 MAY PARTICIPATE AGENDA
 CRITICAL DATES: NONE
 SPECIAL INSTRUCTIONS: I:\PSC\CMU\WP\960090TP.RCM

CASE BACKGROUND

The Commission has ordered LECs to implement various dialing plans throughout Florida for ECS, EAS, and 1+ traffic. Listed below are the dialing patterns ordered by the Commission in the 1+ presubscription, 305 area code relief, and BellSouth's rate case (288 ECS routes) proceedings.

Dialing Plan	Company	Order No.	Docket No.
IntraLATA Toll - 1 + 10D	All LECs	PSC-95-0203-FOF-TP	930330-TP
InterNPA ECS - 10D	BST	PSC-95-1391-FOF-TL	920260-TL
InterNPA Local (including ECS & EAS) - 10D	BST	PSC-95-1048-FOF-TL	941272-TL
IntraNPA Local (including ECS & EAS) - 7D	BST	PSC-95-1048-FOF-TL	941272-TL

Note: D - Digits

Throughout the proceedings listed above, specifically 941272-TL (305 Area Code Relief), 920260-TL (BellSouth's 288 ECS routes),

DOCUMENT NUMBER-DATE

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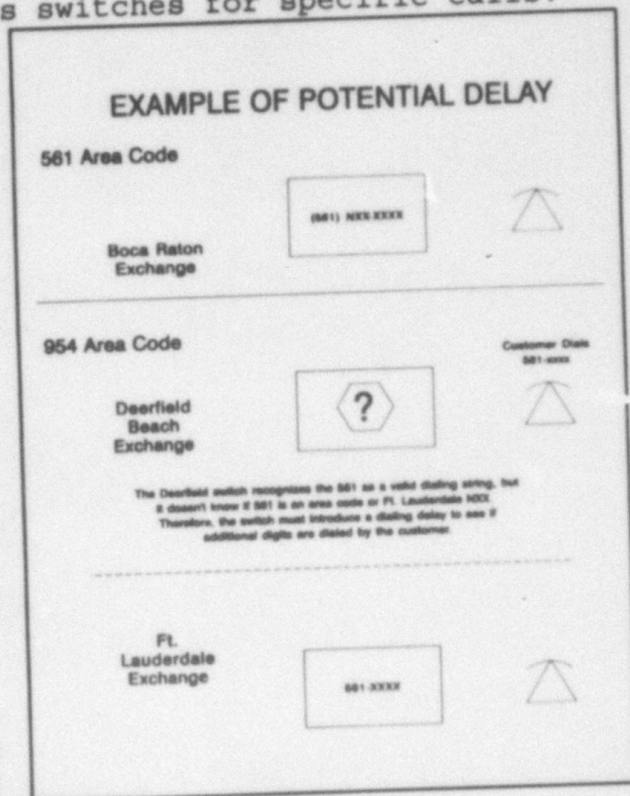
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and 930330-TP (IntraLATA presubscription), BellSouth testified that it could implement the dialing patterns listed above. However, BellSouth has notified staff that it is unable to implement all of the dialing patterns under its current switching architecture. The implementation problem is not the result of a single pattern, but is a long term problem that is due to the implementation of all the dialing patterns listed above.

The initial problem arose when BellSouth began to implement the dialing pattern ordered by the Commission on the 288 ECS routes, in conjunction with the 407 area code relief. It appears the implementation of the new area code, together with ECS routes, will create a situation where BellSouth is required to introduce a 4 - 8 second dialing delay in its switches for specific calls. Currently, BellSouth proposes to use 561 as the area code to relieve 407. If the company continues to implement the 288 ECS routes with 10 digit dialing for interNPA ECS, it will be required to introduce a network delay in any exchange which has ECS to the 561 area code on a 10 digit basis and 7 digit dialing to the new 561 NXX in the Ft. Lauderdale exchange. This delay is necessary to enable the switch to determine if the customer has dialed a 7 digit telephone number to Ft. Lauderdale or a 10 digit ECS telephone number in the new 561 area code. (See example) Staff is unsure whether this is a problem for other LECs.

In addition to this problem, BellSouth has indicated that it cannot implement 10 digit interNPA ECS calling with 1+ presubscription. Apparently, the switch is not capable of recognizing the difference between a customer dialing a 10 digit ECS call and a 1+ presubscribed call. In today's telecommunications networks, the 1 is considered a flag to the switch that the customer will dial 10 digits instead of being used as a toll indicator. This designation does not give BellSouth's switches the ability to differentiate between the 10 digits of either call. Therefore, the traffic would be carried by



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the customer's intraLATA carrier. MCI has expressed concern with the Commission's decisions on BellSouth's ECS plan since a customer would only be able to choose BellSouth's ECS lower rates or a 1+ presubscribed carrier and would be required to dial 10XXX to reach the carrier not chosen by the customer.

This recommendation is to retain the current dialing patterns to be used until staff is able to investigate these problems and file a recommendation on how the Commission should proceed in the future.

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DISCUSSION OF ISSUES

ISSUE 1: Should the Commission initiate an investigation to determine the extent of the problems associated with the dialing patterns ordered by the Commission?

RECOMMENDATION: Yes.

STAFF ANALYSIS: BellSouth has indicated it is unable to implement the dialing patterns identified in the Case Background. Staff does not know what impacts these problems will have on the Commission's past decisions, if any, but believes it is necessary to delay the implementation of the dialing patterns until staff is able to investigate the impacts on all LECs and telecommunications carriers. Delaying implementation of the dialing patterns will not impact the rating of any approved ECS calls. Therefore, staff believes the Commission should initiate an investigation to determine the impacts of these dialing problems and to develop a recommended dialing pattern encompassing all of the previously referenced dockets.

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ISSUE 2: Should the Commission delay implementation of the dialing patterns ordered in Commission Order Nos. PSC-95-1391-FOF-TL and PSC-95-1048-FOF-TL?

RECOMMENDATION: Yes, the Commission should delay implementation of the dialing patterns listed in the orders referenced above until staff is able to recommend an appropriate dialing pattern. The Commission should require BellSouth to retain the existing dialing patterns until the investigation is completed. Delaying implementation of the dialing patterns does not impact the rating of ECS calls.

STAFF ANALYSIS: Staff believes the Commission should delay implementation of the dialing patterns required by Order Nos. PSC-95-1391-FOF-TL, BellSouth's 288 ECS routes, and PSC-95-1048-FOF-TL, 305 Area Code Relief, until staff is able to investigate a solution for the problems identified in the Case Background. Delaying the dialing patterns will not impact the rating of any approved ECS calls.

Initially, it appears that BellSouth will not be able to implement the dialing patterns ordered by the Commission without the possibility of introducing delay into the company's network on specific calls. BellSouth has also indicated it would be unable to implement the Commission's 1+ presubscription order unless changes were made in the dialing patterns associated with the Commission's decision on ECS and 305 Area Code Relief.

Since staff is concerned with the potential customer confusion associated with changing dialing patterns several times over a very short timeframe, staff believes the Commission should delay implementation of the ordered dialing patterns until staff can investigate the problems and develop a workable solution. During the interim period, staff believes the Commission should require BellSouth to retain the existing dialing patterns.

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ISSUE 3: Should this docket be closed?

RECOMMENDATION: No. If the Commission approves Issues 1 and 2, this docket should remain open until completion of the generic investigation. Otherwise, this docket should be closed.

STAFF ANALYSIS: If the Commission approves Issues 1 and 2, this docket should remain open to process the generic investigation.