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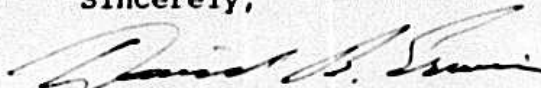
**Ms. Blanco Bayo
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850**

**Re: In re: Petition for numbering plan area relief for
904 area code, by BellSouth Telecommunica-
tions, Inc.
Docket No. 961153-TL**

Dear Ms. Bayo:

**Enclosed please find the original and fifteen copies of the
Direct Testimony of Donald D. Bowden on behalf of Gulf
Telecommunications, St. Joseph Telecommunications and Florida
Telecommunications in the above docket. Copies have been
provided to parties of record.**

Sincerely,



David B. Erwin

DBE:akh
2 Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
PREPARED DIRECT TESTIMONY
OF
DONALD D. BOWDEN

1 Q. Please state your name and business address.

2 A. My name is Donald D. Bowden. My business address is
3 P.O. Box 1120, Perry, Florida 32348.

4 Q. By whom and in what capacity are you employed?

5 A. I am employed by Gulf Telephone Company as the
6 Equipment Engineer.

7 Q. Please describe your background and experience.

8 A. I am a graduate of the University of South Florida in
9 Tampa, Florida, with a Bachelors in Engineering
10 Technology in 1972 and continued graduate work at
11 Florida State University in Tallahassee, Florida
12 receiving a Certificate in Management in 1978. I
13 worked with North Florida Telephone Company in Live
14 Oak, Florida from 1972 to 1974 as the Special Circuit
15 Engineer and with Gulf Telephone Company from 1974 to
16 the present as the Equipment Engineer.

17 Q. What is the purpose of your testimony?

18 A. The purpose of my testimony is to present the positions
19 of Gulf Telecommunications Company ("GTC"), St. Joe
20 Telecommunications Company ("SJC") and Florida
21 Telecommunications Company ("FTC") on options for
22 providing area code relief in the 904 numbering plan
23 area.

24 Q. Was the industry able to reach a consensus on the

1 relief options available for the 904 NPA?

2 A. Yes. The industry reached a consensus that the 904 NPA
3 should be split along LATA boundaries. However, the
4 industry was not able to reach a consensus on which
5 LATAs should be split from the 904 NPA.

6 Q. Can you please describe the three options that have
7 been promoted by the industry code holders for
8 splitting the 904 NPA along LATA boundaries?

9 A. Yes. The three options proposed by the industry code
10 holders are:

11 Option 1: Assign new NPA to Pensacola, Panama City,
12 and Tallahassee LATAs,

13 Option 1A: Assign new NPA to Jacksonville and Daytona
14 LATAs, and

15 Option 2: Assign new NPA to Pensacola and Panama City
16 LATAs.

17 Q. Can you please explain the industry objectives in
18 providing NPA relief?

19 A. Yes. The industry objectives are 1) to provide the
20 longest relief period, 2) minimize number changes, 3)
21 minimize technical and operational impacts and 4) best
22 serve the interest of subscribers. These objectives
23 are consistent with the ICCF NPA Code Relief
24 Guidelines.

1 Q. In evaluating the various options for relief, what are
2 the positions of your companies regarding
3 implementation of a new NPA along LATA boundaries?
4 A. We support option 1A, which assigns a new NPA to the
5 Jacksonville and Daytona LATAs.
6 Q. Do you believe that Option 1A is consistent with the
7 industry objectives?
8 A. Yes. As stated in BellSouth's petition for approval of
9 Numbering Plan Area (NPA) relief for the 904 area
10 codes, with respect to exhaust dates, the impact to the
11 respective LATAs would be the same under Options 1A and
12 Option 1. Thus, Option 1A meets the industry objective
13 to provide the longest relief possible.
14 Q. Isn't it true that Option 1 best meets the industry
15 guidelines to minimize number changes?
16 A. We agree with Quincy's testimony that acknowledges that
17 Option 1 would impact a smaller number of customers and
18 NXXs. However, we also believe that the impact to
19 customers is subjective since a change in area code
20 will impact each customer on an individual basis.
21 Additionally, our companies agree with the position
22 advocated by the Department of Management Services
23 (DMS) that changing the Tallahassee LATA will have a
24 significant and far reaching impact on state government
25 and, in turn, our subscribers.

- 1Q. If the Florida Public Service Commission does not adopt
2 Option 1A, do your companies have an alternative
3 position?
- 4A. Yes. In the alternative, we support an option
5 discussed at the industry meeting on 904 relief but not
6 presented as an option.
- 7Q. Please explain.
- 8A. If the Commission rejects Option 1A, then we would
9 support a 3-way split with the Jacksonville and Daytona
10 LATAs each receiving a new NPA and Tallahassee, Panama
11 City, and Pensacola remaining 904.
12 This plan would allow the Tallahassee, Panama City and
13 Pensacola LATAs to continue with the 904 NPA until
14 2006, the Jacksonville NPA would then exhaust in 2007
15 and Daytona in 2033.
16 Note if Plan 1 is adopted then in two to three years,
17 BellSouth will be meeting again to split Jacksonville
18 and Daytona.
19 We feel this option would have the least long term
20 affect on the subscribers in all the LATAs and State
21 Government.
22 This option was discussed at all Industry meetings held
23 for 904 Relief, but for some reason was not formally
24 presented for consideration.
- 25Q. Are there additional reasons why your companies support
26 a three-way split alternative?

- 1A. Yes. Under a three-way split our companies would
2 maintain the same NPA as Tallahassee. Because there
3 exists a strong community of interest between some St.
4 Joseph subscribers and Tallahassee, and it is essential
5 to our St. Joseph customers to maintain seven digit
6 dialing for local calls between their territory and
7 Tallahassee.
- 8Q. Isn't it true that seven digit dialing between St.
9 Joseph and Tallahassee can continue regardless of
10 whether the Panama City and Tallahassee LATAs have the
11 same NPA?
- 12A. Yes. The technology exists to allow for seven digit
13 dialing between LATAs. However, it would create an
14 inefficient use of NXX codes because codes would also
15 need to be protected to maintain local calling between
16 the Panama City and Tallahassee LATAs.
- 17Q. If the Commission adopts Option 2, do you have any
18 recommendations?
- 19A. Yes. If the Commission adopts Option 2, we agree with
20 Quincy's response in their testimony.
- 21Q. When should the area code relief be implemented?
- 22A. We support the implementation time table set forth in
23 BellSouth's Petition. Permissive dialing should begin
24 February 24, 1997 and mandatory dialing should begin
25 February 23, 1998.
- 26Q. Please summarize your testimony.

1A. St. Joseph, Gulf and Florala recommend that the
2 Commission adopt Option 1A. In the alternative the
3 companies support a three-way split. Both Options
4 provide NPA relief for the greatest period of time.

5Q. Does this conclude your testimony?

6A. Yes.

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