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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

 In the Matter of : DOCKET NO. 961153-TL
 :
 Petition for Numbering :
 Plan Area Relief For 904 :
 Area Code, by BellSouth :
 Telecommunications, Inc. :

FIRST DAY - MORNING SESSION

VOLUME 2

Pages 106 through 236

PROCEEDINGS: HEARING

BEFORE: CHAIRMAN SUSAN F. CLARK
 COMMISSIONER J. TERRY DEASON
 COMMISSIONER JULIA L. JOHNSON
 COMMISSIONER DIANE K. KIESLING
 COMMISSIONER JOE GARCIA

DATE: Monday, December 9, 1996

PLACE: Betty Easley Conference Center
 Room 148
 4075 Esplanade Way
 Tallahassee, Florida

REPORTED BY: H. RUTHE POTAMI, CSR, RPR
 ROWENA NASH HACKNEY
 Official Commission Reporters

APPEARANCES:

(As heretofore noted.)

DOCUMENT NUMBER-DATE

13268 DEC 12 96

FPSC-RECORDS SUPPORTING

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P R O C E E D I N G S

1
2 (Transcript follows in sequence from
3 Volume 1.)

4 **CHAIRMAN CLARK:** Let's call the hearing back
5 to order.

6 **MR. WAHLEN:** Commissioner Clark, I checked
7 at the break and I understand that the parties don't
8 have any objections to stipulating the direct
9 testimony of Lynne G. Brewer of Northeast into the
10 record, and at this time I would like to move that
11 testimony into the record.

12 **COMMISSIONER KIESLING:** All right. Just a
13 minute. Mr. Erwin, did you get clarification on
14 Mr. Bowden?

15 **MR. ERWIN:** I'm not sure I know what you
16 mean. He's not coming.

17 **CHAIRMAN CLARK:** You had requested that his
18 testimony be inserted into the record --

19 **MR. ERWIN:** Yes, that's correct, but I don't
20 know what BellSouth's position is on that. They have
21 indicated to me they might not want to do that.

22 **MS. WHITE:** We will agree to that. It's my
23 understanding that Mr. McCabe to some extent is going
24 to adopt some of what is in Mr. Bowden's testimony, or
25 at least add it to his testimony, so he will be

1 available for cross. So we will accept that.

2 CHAIRMAN CLARK: Well, I'm confused. Do you
3 want me to insert the testimony of Mr. Bowden in the
4 record as though read?

5 MR. ERWIN: Yes, ma'am, I would like that
6 very much.

7 CHAIRMAN CLARK: And there's no objection to
8 that? And you will take up with Mr. McCabe the areas
9 that you want to explore?

10 MS. WHITE: Yes, ma'am, and thank you.

11 CHAIRMAN CLARK: All right. Let's do that
12 before we get to you, Mr. Mayne. Let's take up
13 Ms. Brewer first.

14 MS. WHITE: Chairman Clark, before you do
15 that, is it okay if Mr. Baeza is excused?

16 CHAIRMAN CLARK: Yes, Mr. Baeza, may be
17 excused.

18 MS. WHITE: Thank you.

19 (Witness Baeza excused.)

20 CHAIRMAN CLARK: Mr. Wahlen, Ms. Brewer has
21 no exhibits?

22 MR. WAHLEN: That's correct.

23 CHAIRMAN CLARK: The prefiled direct
24 testimony of Lynn Brewer consisting of 11 pages will
25 be inserted in the record as though read.

1 **MR. WAHLEN:** Thank you.

2 **CHAIRMAN CLARK:** And Ms. Brewer is excused
3 from appearing today.

4 **MR. WAHLEN:** Thank you.

5 **CHAIRMAN CLARK:** The prefiled direct
6 testimony of Donald Bowden consisting of six pages as
7 revised on November 7th, 1996 -- is that correct,
8 Mr. Erwin?

9 **MR. ERWIN:** That's correct.

10 **COMMISSIONER KIESLING:** -- will be inserted
11 in the record as though read. And, as I understand
12 it, he has no exhibits.

13 **MR. ERWIN:** That's correct.

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**NORTHEAST FLORIDA TELEPHONE
COMPANY, INC.
DOCKET NO. 961153-TL
FILED: 11/01/96**

BEFORE THE PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

LYNNE G. BREWER

1
2
3
4
5 **Q. Please state your name, address and position with Northeast**
6 **Florida Telephone Company, Inc. ("Northeast" or "The**
7 **Company").**

8
9 **A. My name is Lynne G. Brewer. I am employed by Northeast as**
10 **Director - Revenue Requirements and Regulatory Affairs. My**
11 **business address is 130 North 4th Street, Macclenny,**
12 **Florida.**

13
14 **Q. Please give a brief description of your educational**
15 **background and experience.**

16
17 **A. I was graduated from Rollins College with a B.S. degree in**
18 **Accounting and Business Administration. I have been with**
19 **Northeast for only one year, but I have over eighteen years**
20 **of experience in the telecommunications industry. My most**
21 **recent assignment, prior to joining Northeast, was as a**
22 **Cost Analysis Manager with the National Exchange Carrier**
23 **Association (NECA) in the Atlanta regional office. I spent**
24 **eleven years with NECA in various management assignments.**
25 **Prior to joining NECA, I was a Telecommunications**

1 Consultant with a consulting firm owned by TDS, Inc. I
2 began my career in 1978 with United Telephone Company of
3 Florida (now called "Sprint") as an Accounting Clerk.
4 While at United, I moved rapidly through this company to
5 levels of increased responsibility during my employment.

6

7 Q. What is the purpose of your testimony?

8

9 A. The purpose of my testimony is to state Northeast's
10 position on the appropriate numbering plan area relief in
11 the 904 area code, as identified by the parties of record
12 in this docket.

13

14 Q. Before you state Northeast's position, would you please
15 explain the various forms of relief options for the 904
16 area code that have been promoted by industry code holders
17 as filed by BellSouth Telecommunications, Inc.
18 ("BellSouth") in this docket.

19

20 A. Yes. BellSouth has presented three relief options.
21 Consensus was reached by all code holders and other
22 interested parties that the NPA should be split along LATA
23 boundaries. The five LATAs that would be affected by the
24 904 area code relief plan would be Daytona, Jacksonville,
25 Panama City, Pensacola and Tallahassee. The issue that

1 must be resolved in this docket is which LATAs will be
2 split from the 904 NPA. The three relief options that have
3 been proposed by the industry are:

- 4 a. Option 1: Assign a New NPA to the Pensacola, Panama
5 City and Tallahassee LATAs
6 b. Option 1a: Assign a New NPA to the Jacksonville and
7 Daytona LATAs
8 c. Option 2: Assign a New NPA to the Pensacola and
9 Panama City LATAs

10
11 Q. In light of the three options noted above, what is
12 Northeast's position regarding the implementation of area
13 code relief by the Florida Public Service Commission
14 ("Commission")? (Issue 1)

15
16 A. Northeast's position on this issue is that Option 1 is the
17 most appropriate choice when the guidelines for NPA relief
18 are considered. It offers the greatest amount of relief
19 for both the new (850) and the old (904) NPAs. Under
20 Option 1, the estimated exhaust date of the 904 area code
21 for the Jacksonville and Daytona LATAs would be October
22 2002 and the anticipated exhaust date of the Pensacola,
23 Panama City and Tallahassee LATAs under the new 850 area
24 code would be November 2006.

25

1 In additional, a smaller number of NXXs (661) would be
2 impacted under Option 1, when compared to the NXXs (1019)
3 located in the Jacksonville and Daytona LATAs under Option
4 1a.

5
6 Under Option 1, Northeast's 7,419 customers would only be
7 impacted when they placed calls to the new 850 serving area
8 (i.e., locations within the Pensacola, Panama City and
9 Tallahassee LATAs). The Company's Extended Local Calling
10 (ELC) plans between Jacksonville and Lake City would not be
11 impacted. If Option 1 is implemented by the Commission,
12 Northeast would only have to change the NPA designation for
13 the 661 NXXs (versus 1019 NXXs) located in the Pensacola,
14 Panama City and Tallahassee LATAs. However, since
15 Northeast is currently installing a new switch, the Company
16 will be required to perform redundant work in both switches
17 until the installation is completed. This means that the
18 Company would be required to change the NPA code for the
19 661 NXXs in both switches. There is a lot of difference
20 between changing 1,322 NXX codes and 2,038 NXX codes in the
21 switch. The latter will take more time and produce a
22 greater chance of error.

23
24 Also, Northeast's area was recently impacted by the 904
25 area code split that was implemented in the Gainesville

1 LATA, which is contiguous to the Jacksonville and Daytona
2 LATAs. Customers in these areas are still adjusting to
3 their area code change. Implementation of another new area
4 code for these customers would present an undue hardship on
5 them soon after the 904 area code split in the Gainesville
6 LATA. Any change in the area code will significantly
7 impact the residential and business customers who subscribe
8 to the variety of telecommunications services that are
9 available in this area, such as land-line telephone
10 service, fax capabilities, paging, cellular, PCS, etc.

11
12 In addition to the above information, the Commission should
13 not overlook the fact that Jacksonville is one of the five
14 largest cities in Florida. It has been identified as one
15 of the top 100 MSAs for implementation of local number
16 portability by the FCC. The target date for implementation
17 is the third quarter of 1998. The proposed date for
18 implementation of the 904 NPA split is February 23, 1998.
19 This only provides a period of five to eight months between
20 these major projects. If an area code change is made in
21 the Jacksonville LATA and then local number portability is
22 implemented five months later, those companies operating in
23 the Jacksonville LATA, including Northeast, will be hit
24 doubly hard with NXX changes and the routing of ported
25 local numbers. Both of these projects will require

1 significant effort to complete. It is not fair to impose
2 a change in the area code on those companies, like
3 Northeast, at the same time that they are struggling with
4 the issues associated with the implementation of local
5 number portability. Nor will it serve the best interests
6 of the customers who live and work in the Jacksonville
7 area.

8
9 Please note that Northeast does not have to comply directly
10 with local number portability requirements by the third
11 quarter of 1998. However, it cannot be ignored that the
12 Company will be significantly impacted. As stated earlier,
13 Northeast has ELC plans that terminate to 148 NXXs in
14 Jacksonville. Jacksonville and its surrounding areas
15 provide a large community of interest to our customers.
16 According to the Baker County Chamber of Commerce,
17 approximately 44% of working adults in Baker County are
18 employed outside Baker County. Ninety percent (90%) of
19 these adults work in the Jacksonville area. These
20 customers will be significantly impacted by a change in the
21 area code and the changes that will be forthcoming with
22 local number portability. Northeast contends that it is
23 unrealistic to expect the average customer to understand
24 all these changes, if they are happening at about the same
25 time. Therefore, Option 1 would provide the best means of

1 implementing area code relief for the 904 NPA.

2

3 Q. Does Northeast anticipate opposition to Option 1?

4

5 A. Yes. Even though this option provides the best means for
6 904 NPA area code relief, the State of Florida Department
7 of Management Services is opposed to this option, because
8 they believe that the expense of changing the 904 NPA in
9 the Tallahassee LATA would be cost prohibitive and would
10 not serve the public interest. Also, some companies
11 located in the Pensacola, Panama City and Tallahassee LATAs
12 may be opposed to Option 1 for obvious reasons. However,
13 this option should not be discounted by the Commission
14 until all interested parties, including those customers who
15 will be impacted by the proposed NPA changes, have had a
16 chance to voice their concerns.

17

18 Q. In light of the opposition to Option 1 noted above, does
19 Northeast have an alternative position on how the
20 Commission should implement area code relief?

21

22 A. Yes. For the reasons that I have noted above under Option
23 1, Northeast's alternative position is that Option 2 should
24 be implemented if Option 1 is not acceptable to the
25 Commission. A change in the 904 area code in the

1 Tallahassee, Jacksonville and Daytona LATAs would impact a
2 current population of approximately 2 million, while less
3 than a million people would be impacted if the new area
4 code were implemented in the Pensacola and Panama City
5 LATAs.

6
7 The estimated exhaust date for the 904 area code under
8 Option 2, based on the projections from BellSouth's
9 exhibits in this docket, would be March 2001. The
10 anticipated exhaust date for the 850 area code under this
11 option would be June 2012. Also, the adoption of Option 2
12 will only impact code changes in 558 NXXs, as compared to
13 1019 code changes that would be required if Option 1a is
14 accepted by the Commission.

15
16 Q. When should area code relief be implemented by the
17 Commission?

18
19 A. Northeast's position on the date of implementation is
20 consistent with that proposed by BellSouth in this docket.
21 Permissive dialing should be allowed beginning on February
22 24, 1997, with mandatory dialing to become effective one
23 year later, on February 23, 1998.

24
25 Q. What problems will the numbering area relief plans for 904

1 area code cause Florida citizens and the general public in
2 their efforts to communicate with Florida government?
3 (Issue 2)

- 4
- 5 A. If Option 1 is adopted by the Commission, we believe that
6 Florida citizens and the general public may be minimally
7 impacted. Citizens and the general public will have until
8 February 23, 1998 to become familiar with the new 850 area
9 code for Tallahassee. Also, many of the State's consumer
10 telephone lines have been established under 800 numbers,
11 which would not impact the consumer at all.

12

13 Citizens of Florida who reside in the Jacksonville and
14 Daytona LATAs will be impacted more severely than those
15 consumers and the general public who are in contact with
16 the State of Florida. While we recognize the State of
17 Florida Department of Management Services' concerns about
18 the costs to the State of implementing Option 1, we feel
19 that it still provides the best way to implement area code
20 relief.

21

22 In regard to our alternative proposal, Option 2, we see no
23 impact on the general public and Florida citizens in regard
24 to those calls made to State agencies and government
25 offices, since the Tallahassee LATA would remain under the

1 904 area code. The only problem that we see with the
2 implementation of Option 2 would be how to maintain several
3 local calling plans that currently exist between the
4 Tallahassee and Panama City LATAs. However, it is our
5 understanding that the issue of interLATA calling plans
6 will be addressed further in an upcoming Commission
7 hearing. As noted earlier in my testimony, any change to
8 the 904 area code in the Jacksonville and Daytona LATAs
9 will significantly impact the residential and business
10 customers who live and work in this area.

11
12 Q. Would you please summarize your testimony and state what
13 action you recommend the Commission take regarding area
14 code relief?

15
16 A. Yes. Northeast has shown that the optimal plan for
17 implementation of 904 area code relief is Option 1. It
18 best satisfies the guidelines under the North American
19 Numbering Plan (NANP) and provides the largest period of
20 relief for both area codes (850 and 904). In the
21 alternative, Option 2 would also conform to NANP
22 guidelines, impact the fewest number of subscribers,
23 including the State of Florida, and require the least
24 number of NXX code changes.

25

1 We concur with the implementation dates for the new 850
2 area code that BellSouth has proposed in their petition to
3 this Commission.

4
5 We do not anticipate that a significant number of problems
6 will surface with the implementation of either Option 1 or
7 2. However, those customers in the Jacksonville and
8 Daytona LATAs will experience undue hardship if Option 1a
9 is implemented by the Commission.

10

11 Q. Does this conclude your direct testimony?

12

13 A. Yes.

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 Florida 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.

7

1 **CHAIRMAN CLARK:** And both those witnesses
2 are excused from testifying. Mr. Mathues?

3 **MR. MATHUES:** We would call Mr. Mayne.

4 **CHAIRMAN CLARK:** Go ahead.

5 - - - - -

6 **GLENN W. MAYNE**

7 was called as a witness on behalf of the Department of
8 Management Services and, having been duly sworn,
9 testified as follows:

10 **DIRECT EXAMINATION**

11 **BY MR. MATHUES:**

12 **Q** Please state your name.

13 **A** My name is Glen Mayne.

14 **Q** And have you previously been sworn in this
15 proceeding?

16 **A** Yes, I have.

17 **Q** What's your business address?

18 **A** 4050 Esplanade Way in Tallahassee, 32399,
19 Building 4030, Suite 260.

20 **Q** How are you currently employed?

21 **A** I'm the director of the division of
22 communications within the Department of Management
23 Services.

24 **Q** Are you the same Glen Mayne who previously
25 filed testimony consisting of 9 pages in this

1 proceeding?

2 A Yes.

3 Q And were there four exhibits attached to
4 that testimony?

5 A Yes.

6 Q And have you also filed revised direct
7 testimony in this proceeding?

8 A Yes.

9 Q And was it your intention that the same
10 original four exhibits apply to the revised testimony?

11 A Yes.

12 MR. MATHUES: To the people in the room, I
13 apologize that those exhibits were not attached. I
14 have additional copies up here for anybody who needs
15 them.

16 Q (By Mr. Mathues) Does your revised
17 testimony include any corrections or revisions to your
18 initial testimony?

19 A Yes, it does.

20 Q And what corrections are necessary?

21 A On Page 6, Line 6, the data that we included
22 in the original version we found late last week was
23 incorrect, so we made those corrections and
24 resubmitted the testimony.

25 Q If I were to ask you the same questions

1 today, would you give the same answers that are in
2 your revised testimony?

3 A Yes.

4 CHAIRMAN CLARK: Mr. Mathues, let me
5 interrupt you. As I understand what Mr. Mayne has
6 just said, the revised testimony as filed needs no
7 corrections.

8 MR. MATHUES: That's correct.

9 CHAIRMAN CLARK: Okay.

10 MR. MATHUES: Other than the assembler's
11 error of not including the exhibits again.

12 CHAIRMAN CLARK: Okay.

13 MR. MATHUES: Chairman Clark, at this point
14 I would move the revised testimony of Mr. Mayne into
15 the record.

16 CHAIRMAN CLARK: All right the prefiled
17 testimony of Mr. Mayne as revised, consisting of nine
18 pages, will be inserted in the record as though read.

19 Q (By Mr. Mathues) Mr. Mayne, do you have a
20 summary of your testimony?

21 CHAIRMAN CLARK: Mr. Mathues, let's make
22 sure we have the correct exhibits. Should the
23 exhibits attached to his testimony include GWM-1
24 through 9?

25 MR. MATHUES: No. They would be GWM-1

1 through 4. There are late-filed exhibits as a result
2 of his deposition, which I think Staff is going to get
3 into, which are 1 through 11 and revised Late-filed 8
4 and 9.

5 **CHAIRMAN CLARK:** But to be clear, the only
6 exhibits attached to his testimony that he is
7 sponsoring at this time as part of his testimony are
8 GWM-1 through 4.

9 **MR. MATHUES:** That's correct.

10 **CHAIRMAN CLARK:** All right. We will mark
11 them as Composite Exhibit 13.

12 (Exhibit 13 marked for identification.)

13

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1 REVISED TESTIMONY OF GLENN W. MAYNE
2 BEFORE THE
3 FLORIDA PUBLIC SERVICE COMMISSION
4 PETITION FOR NUMBERING PLAN
5 AREA RELIEF FOR 904 AREA CODE
6 BY BELLSOUTH TELECOMMUNICATIONS, INC.
7 DOCKET NO. 961153-TL
8

9 QUESTION: Please state your name and business address.

10 ANSWER: My name is Glenn W. Mayne. My business address is
11 Department of Management Services, Division of
12 Communications, 4050 Esplanade Way, Building 4030,
13 Suite 260, Tallahassee, Florida 32399-0950.
14

15 QUESTION: By whom are you employed, and what is your
16 position?

17 ANSWER: I am employed by the Florida Department of
18 Management Services, Division of Communications,
19 as the Division Director.
20

21 QUESTION: Please summarize your background with the
22 Department of Management Services?

23 ANSWER: I have been Director for the Division of
24 Communications since 1985 and participated in the
25 design and implementation of the current SUNCOM

1 Network as a fully integrated digital network that
2 carries voice, data, video, image and radio
3 signals. SUNCOM provides communications services
4 that link state agencies, universities, community
5 colleges, county governments, municipalities, and
6 libraries throughout Florida.

7

8 QUESTION: Do you have statutory authority to present
9 testimony on behalf of the State?

10 ANSWER: Section 282.102(21), Florida Statutes, outlines
11 the powers and duties of the Division of
12 Communications of the Department of Management
13 Services. By statute the Division of
14 Communications is charged with the responsibility
15 of presenting testimony before the Florida Public
16 Service Commission on behalf of state agencies on
17 issues relating to the State's communications
18 facilities and services.

19

20 QUESTION: What is the purpose of your testimony?

21 ANSWER: The purpose of my testimony is to present the
22 impact to state agencies if the 904 area code
23 changes for the Tallahassee Market Area.
24 Specifically, there are two issues I want to
25 address: fiscal impact and community of interest

1 considerations.

2

3 **QUESTION:** How do these issues affect state agencies?

4 **ANSWER:** The first issue, fiscal impact, will cause a
5 reallocation of tax dollars that otherwise would
6 be used to support ongoing programs and services.
7 More importantly, however, is the second issue,
8 community of interest considerations, and how a
9 904 area code change will interfere with the
10 ability of Florida's citizens and the general
11 public to communicate with Florida state
12 government in Tallahassee.

13

14 **QUESTION:** Explain how state agencies will be fiscally
15 impacted if the Tallahassee Market Area is removed
16 from the 904 area code.

17 **ANSWER:** If a new area code is assigned to the Tallahassee
18 Market Area, state agencies will incur expense not
19 only to reprogram private automatic branch
20 exchanges (PABXs), electronic key systems (EKs),
21 faxes, autodialers, etc. but also to reproduce and
22 redistribute public information. All these
23 expenses will take away from fixed revenue sources
24 for state agencies. State agencies do not have
25 opportunities to recover these costs through tax

1 deduction relief as a business expense, increased
2 prices, or other means that may be available to
3 the private sector.
4

5 QUESTION: Please summarize the impact for reprogramming
6 equipment.

7 ANSWER: The State has 340 PABXs and 1600 electronic key
8 systems throughout Florida. A conservative cost
9 estimate to reprogram this equipment's special
10 functions and features (speed call long list,
11 speed call short list, toll restriction, etc.) is
12 estimated to be \$500,000. Ultimately, this figure
13 could approach \$1,500,000, depending upon the
14 status of software configurations that provide the
15 North American Numbering Plan dialing scheme. In
16 addition, there are 176 consolidated systems
17 (ESSX, CentraNet, Centrex) serving some 128,000
18 stations that will have to be reviewed with
19 similar changes being made to the speed call lists
20 and special routing features. It is estimated
21 that this cost will be an additional \$160,000.
22

23 QUESTION: What other fiscal impact could a change in the 904
24 area code in the Tallahassee Market Area have on
25 state agencies?

1 **ANSWER:** There will also be costs for reprinting and
2 redistributing public information by state
3 agencies. To illustrate potential fiscal impact,
4 I have a letter from the Division of Retirement
5 estimating \$200,000 to republish and redistribute
6 retirement publications. (Exhibit No. GWM-1) I
7 also have a letter from the office of the
8 Secretary of State estimating a cost impact of
9 \$60,000 to \$75,000. (Exhibit No. GWM-2) The
10 Department of Business and Professional Regulation
11 estimates costs at \$25,000 to reprint existing
12 forms and \$15,000 to make programming changes.
13 (Exhibit No. GWM-3) Given estimates for these
14 agencies, I can extrapolate among all agencies and
15 arrive at an overall estimated impact figure of
16 \$2,480,000.

17

18 **QUESTION:** You mentioned the community of interest
19 consideration as the major issue to state
20 agencies. Explain this concept.

21 **ANSWER:** As the location for Florida's capital and state
22 government, the Tallahassee Market Area holds a
23 community of interest for 14 million Florida
24 citizens and the general public. There are
25 numerous state agencies that provide consumer

1 assistance in dealing with complaints, licenses,
2 registrations, permits, taxes, etc. The
3 Tallahassee Market Area is unique in that incoming
4 call volumes are high. On a typical business day,
5 the call volume into state government from the
6 public, external to Tallahassee and excluding any
7 800 traffic, exceeds 110,000 calls per day, which
8 equates to 2.2 million calls per month. It is the
9 great community of interest demonstrated by this
10 call volume that makes an area code change for the
11 Tallahassee Market Area disruptive and
12 undesirable. The letters from state agencies I
13 have submitted as exhibits voice significant
14 concerns about the public confusion and irritation
15 that is likely to result with a 904 area code
16 change in Tallahassee. (Exhibit Nos. GWM-1, GWM-2,
17 and GWM-3)

18
19 QUESTION: Are you familiar with other area code changes in
20 Florida and the impact to state agencies?

21 ANSWER: There is an impact on state government with any
22 area code change in Florida, but none of the
23 previous changes are of the same magnitude as
24 changing the area code for the state capital.
25 From a state agency standpoint, the high community

1 of interest with outside calling areas statewide
2 and nationally does not exist in the other Florida
3 locations, as it exists for the state capital.
4 Many calls coming into Tallahassee for state
5 agencies are from callers who would not be aware
6 of the area code change and may be relying on
7 older, unrevised state information in placing a
8 call.

9

10 **QUESTION:** Have you had any experience with trying to change
11 the dialing habits of your SUNCOM customers in the
12 past?

13 **ANSWER:** Yes, in fact we changed the off-net dialing plan
14 for our SUNCOM Network customers about one year
15 ago. That change required callers dialing a
16 public switched network (PSN) number to add a "1"
17 before dialing the 10-digit number. The Division,
18 in conjunction with the SUNCOM vendors, worked for
19 one year in preplanning, designing, testing, and
20 advertising this change. The results were still a
21 disaster for the first couple of weeks.
22 Electronic Key Systems, PABXs, fax machines, etc.
23 had to be reprogrammed, and in some cases the
24 level of the generic program had to be upgraded.
25 Today the customers served by the Tallahassee

1 SUNCOM switch are still dialing incorrectly on the
2 average of 1200 times per day. If this same
3 experience is encountered through a 904 area code
4 change to the capital city, then Florida's
5 citizens will be frustrated. I have a letter from
6 the State of Alabama that points out this was a
7 major issue with them during an area code change
8 in Montgomery two years ago. (Exhibit No. GWM-4)

9

10 **QUESTION:** Please summarize your testimony.

11 **ANSWER:** In my testimony I have addressed two issues that
12 impact state government should the Tallahassee
13 Market Area be removed from the 904 area code:
14 fiscal impact and the disruption to the public
15 based on a high community of interest with the
16 Tallahassee Market Area. I have addressed the
17 financial burden that will be born by state
18 agencies for reprogramming and redistributing
19 public information. I have also presented
20 information on the incoming call volumes that
21 exist in the Tallahassee Market Area on account of
22 state government. In closing, I would like to
23 emphasize one more point, that of service. State
24 government exists to provide a multitude of
25 services for its citizens. I am convinced that a

1 change in the 904 area code would impact the
2 State's ability to provide quality service and
3 become a hard-to-heal sore spot of frustration for
4 Florida's citizens and the general public for
5 years to come.

6

7 QUESTION: Does this conclude your testimony?

8 ANSWER: Yes.

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1 **MR. MATHUES:** May we proceed with his
2 summary?

3 **CHAIRMAN CLARK:** You may.

4 **Q** **(By Mr. Mathues)** Do you have a summary of
5 your deposition?

6 **A** Yes, I do.

7 **Q** Please.

8 **A** Thank you. Madam Chairman, Commissioners,
9 the Department of Management Services is charged by
10 Florida statutes with the responsibility of presenting
11 testimony before you, the Florida Public Service
12 Commission, to represent the interests of state
13 agencies on issues that relate to the state's
14 telecommunications services.

15 My testimony will not focus on the options
16 and plans available for 904 area code numbering
17 relief, but on the impact to state agencies if the 904
18 area code should change for the Tallahassee market
19 area.

20 I have significant concerns about
21 repercussions for state government in Tallahassee if
22 the 904 area code changes. One concern is the fiscal
23 impact of state agencies. State agencies will be
24 required to republish and reprint public information
25 and to reprogram equipment. The financial burden to

1 accomplish this may appear very small in comparison to
2 the overall state budget. However, there still is a
3 fiscal impact.

4 This fiscal impact is not the real issue, in
5 my opinion. Agencies have hundreds of older
6 documents, plans and publications that have been out
7 for a number of years containing area codes and
8 telephone numbers of state agencies. These will still
9 be in the hands of the public. It is our observation
10 that these publications will continue to be used by
11 the public to access state government for a relatively
12 long period of time.

13 This brings me to my main concern removing
14 the 904 area code from the Tallahassee market area,
15 and that is the impact on the ability of Florida
16 citizens and the general public to communicate with
17 Florida State government in Tallahassee. As the
18 location for Florida's capital and state government,
19 Tallahassee holds a very high community of interest
20 for our 14 million citizens and the nationwide public.

21 There are numerous state agencies that
22 provide public assistance in dealing with complaints,
23 licenses, registrations, permits, taxes and other
24 issues dealing with state government. On a typical
25 business day the call volume into state government

1 exceeds one 110,000 calls per day, and these calls are
2 external to Tallahassee and exclude any 800 traffic.
3 This equates to some 2.2 million calls per day from
4 the public into state government.

5 Many calls coming from the Tallahassee state
6 agencies are of callers who would be unaware of the
7 area code change and may be relying on this older
8 information I've discussed in placing this call. It
9 is this great community of interest demonstrated by
10 this call volume that would make an area code change
11 in the Tallahassee market area, in our opinion,
12 disruptive and undesirable.

13 Even with a year-long permissive dialing, I
14 am still uncomfortable thinking about the long-term
15 implications that the 904 area code change would have
16 on the calling public into Tallahassee for dealing
17 with state government's business.

18 Based on our division's experience with the
19 Suncom network change in the off-net dialing plan that
20 occurred a year ago, have been absolutely amazed at
21 the dialing confusion that can occur.

22 In spite of our very concentrated efforts
23 with the industry to preplan, test and advertise this
24 change, the results were still a disaster for the
25 first couple of weeks. Electronic key systems, PBXs,

1 fax machines and data devices had to be preprogrammed.
2 In some cases the level of the generic program had to
3 upgraded.

4 Today the customers served by the
5 Tallahassee Suncom switch are still dialing ten-digit
6 numbers incorrectly on an average of 1,200 times a
7 day. With this many misplaced calls, Florida citizens
8 and the general public will be confused and frustrated
9 with an area code change. There's no doubt in my mind
10 that the quality of service provided by state
11 government will certainly be ill served by a decision
12 to remove the 904 area code from the Tallahassee
13 market area.

14 This concludes my summary. Thank you.

15 MR. MATHUES: Madam Chairman, we would
16 tender Mr. Mayne for cross examination.

17 CHAIRMAN CLARK: Mr. Erwin?

18 MR. ERWIN: I have no questions.

19 CHAIRMAN CLARK: Mr. Beatty?

20 MR. BEATTY: We have no questions.

21 CHAIRMAN CLARK: Mr. Wahlen?

22 MR. WAHLEN: No questions.

23 CHAIRMAN CLARK: Mr. Herron?

24 MR. HERRON: No questions.

25 MS. RULE: No questions.

1 **CHAIRMAN CLARK:** Staff?

2 **MR. COX:** Yes, Madam Chairman, we have a few
3 questions of the witness.

4 **CROSS EXAMINATION**

5 **BY MR. COX:**

6 **Q** Mr. Mayne, I'm Will Cox appearing on behalf
7 of Commission Staff. Do you have before you now a
8 copy of Staff's exhibit labeled as GWM-5, consisting
9 of your deposition and Late-filed Exhibits 1 through
10 11 for this docket, and also GWM-7, which are the
11 revisions to the Late-filed Exhibits 8 and 9?

12 **A** Yes.

13 **Q** Do you have those before you?

14 **A** Yes.

15 **Q** Do you have any corrections or modifications
16 to make to those exhibits?

17 **A** No.

18 **MR. COX:** Chairman Clark, Staff requests
19 that these two exhibits be marked together as a
20 composite exhibit for purposes of identification.

21 **CHAIRMAN CLARK:** You're requesting that
22 GWM-5 and GWM-7 be a composite exhibit?

23 **MR. COX:** Yes.

24 **CHAIRMAN CLARK:** Okay. I will label them as
25 Exhibit 14.

1 (Exhibit 14 marked for identification.)

2 Q (By Mr. Cox) Mr. Mayne, I have several
3 questions regarding your direct testimony in this
4 docket. On Page 4 of your direct testimony, Line 12,
5 you indicate that it will cost \$500,000 to reprogram
6 speed call lists, speed call short lists, toll
7 restriction, et cetera, for state PBXs and key
8 systems.

9 Besides the speed call lists, speed call
10 short lists and toll restrictions, what other items
11 are included in this reprogramming cost?

12 A I don't know.

13 Q Will some of this reprogramming be handled
14 by state employees?

15 A I think that there's a possibility that some
16 of it would, yes.

17 Q Do you have any idea how much of that would
18 be handled by state employees?

19 A No, I really don't.

20 Q Would DMS employees handle any of these
21 reprogramming requirements?

22 A Yes. I think there are -- there's at least
23 one PBX that I recall within DMS, and we probably
24 would have some of our employees working on that one.

25 Q And that is all that DMS would handle, to

1 your knowledge?

2 A That's the only one that I can think of
3 right now.

4 Q Could you explain to me what is required as
5 far as time and cost and labor to reprogram these
6 functions?

7 A That's all in the exhibits we submitted to
8 you. I don't have that in front of me.

9 Q To your knowledge, is it a software change
10 or a hardware change?

11 A Best of my understanding, it's mostly
12 software.

13 Q My next question refers to your Late-filed
14 Deposition Exhibit Numbers 3, GWM-5 on Page 86,
15 Composite Exhibit 14.

16 A Page 86?

17 Q Page 86 you state that a conservative
18 estimate to reprogram each PBX and each key system
19 would be \$300.00 and \$250.00, respectively. Can you
20 explain why you believe this is a conservative
21 estimate?

22 A No, I can't. This was prepared by my Staff,
23 and I did not discuss that with them.

24 Q You stated earlier that some of the
25 reprogramming costs would be handled by state

1 employees. Did you take that into consideration when
2 you developed your estimate of the \$500,000 for this
3 type of preprogramming?

4 A My recollection in talking to Staff is that
5 was taken into consideration, and it was based on some
6 average salary figures that we had, yes.

7 Q Next question, I want to refer you to Page 4
8 of your direct testimony, Line 13. With regards to
9 this \$500,000 figure that we were just discussing, you
10 state that the \$500,000 figure could approach
11 \$1,500,000; is that correct?

12 A To the best of my knowledge.

13 Q Why would that approach \$1,500,000?

14 A That would be contained also in the
15 late-filed exhibits that I asked Staff to put together
16 for you folks.

17 Q My next question refers again to your
18 Late-filed Deposition Exhibits, Number 5 of GWM-5 on
19 Page 88, and that's Composite Exhibit 14. On Page 88
20 you indicate that the increase from the \$500,000 to
21 the \$1,500,000 is due to the need for a software
22 upgrade for key systems that cost \$1,500 in order to
23 provide for the North American number plan dialing
24 scheme, which is required if the systems are
25 reprogrammed with the call restriction.

1 Could you explain what you are referencing
2 when you say "to provide the North American numbering
3 plan dialing scheme"?

4 A No, I can't. That's why I asked my Staff to
5 prepare this for you.

6 Q You state that the software upgrade is
7 required if the key systems are programmed with the
8 call restriction. Could you explain what this calling
9 restriction is?

10 A No, sir, I can't.

11 Q Again in the late-filed deposition exhibits
12 you indicate that approximately half of the electronic
13 key systems will need this \$1,500 software upgrade.
14 To the best of your knowledge, is this correct?

15 A To the best of my knowledge, it is.

16 Q Do you know how many interchangeable NPAs
17 have been implemented in the North American numbering
18 plan?

19 A No, sir.

20 Q Subject to check, would you agree that there
21 are greater than 50 interchangeable NPAs which have
22 been implemented?

23 A I wouldn't have any idea.

24 Q I'd like to refer you right now to Exhibit
25 Number 7 from this proceeding. Do you have a copy of

1 that before you?

2 A Yes.

3 Q If you look closely at this exhibit, you'll
4 note that there are greater than 50 interchangeable
5 NPAs in existence in this country at this time.

6 A I'm sorry. I'm looking at this Exhibit
7 Number 7 that you gave me?

8 Q Yes, with the list of area codes.

9 A I don't see any list listing --

10 Q The interchangeable area codes on this
11 exhibit are those that are underlined. Are you
12 looking at Exhibit 7?

13 A I'm looking at the Exhibit 7 that's got the
14 changes that we made to the late-filed exhibits.

15 Q Okay. This is Exhibit 7 for this proceeding.
16 Staff will provide you with a copy at this time. And
17 if you'll note, on this exhibit there are a number of
18 area codes listed. Those underlined are those that
19 are interchangeable area codes. As you can see, there
20 are a number of interchangeable area codes included
21 there.

22 A Okay.

23 Q In your late-filed exhibit you noted that
24 approximately half the key systems would need the
25 required upgrade. Could you explain how these systems

1 are making calls to the existing interchangeable NPAs
2 today?

3 A No, sir, I can't.

4 CHAIRMAN CLARK: Mr. Mayne, you would agree,
5 though, to the extent somebody who uses a phone hooked
6 up to one of those systems wants to call one of these
7 area codes in Florida the 352 or the 361, that the
8 code -- the PBX or the key system would have to be
9 upgraded?

10 WITNESS MAYNE: Yes. Is that what I was
11 being asked, Madam Chairman?

12 CHAIRMAN CLARK: I believe so. Maybe I --

13 WITNESS MAYNE: I'm sorry. I did not
14 interpret it that way. I'm -- .

15 Q (By Mr. Cox) That was part of the
16 question. The question actually referred to the fact
17 that since there have been a number of interchangeable
18 area codes already implemented, that the key systems
19 in existence now would have already needed the change
20 required for interchangeable area codes. Is the
21 question clear now, Mr. Mayne?

22 A I understand what you're saying, and I
23 honestly don't know.

24 Q The next question refers to your direct
25 testimony submitted in this docket on Page 4, Line 21.

1 Line 21 you estimate that it will cost \$160,000 to
2 upgrade 176 consolidated systems such as ESSX,
3 Internet and CENTREX. Who will be responsible for
4 handling these upgrades?

5 A That would be the industry that we acquire
6 those services from.

7 Q So would that be the local exchange company?

8 A Yes.

9 Q To your knowledge, will the local exchange
10 company handle these upgrades for free, or do you
11 believe that they will charge you for these upgrades?

12 A I don't know.

13 CHAIRMAN CLARK: Mr. Mayne, then if you
14 don't know whether or not you'll be charged, does that
15 affect your cost estimates?

16 WITNESS MAYNE: No. The cost estimate was
17 based on I asked my Staff to go back and take a look
18 at our agreements that we have with the local exchange
19 companies and try to come up with a cost estimate on
20 that. Whether or not we could negotiate that away or
21 change it in some fashion, I don't really know.

22 CHAIRMAN CLARK: ESSX is a service you
23 purchase from a local exchange company, would that
24 be --

25 WITNESS MAYNE: That's correct.

1 **CHAIRMAN CLARK:** And as I understand it, it
2 would be -- that system would have your toll
3 restrictions and speed call short list and things like
4 that. It could be part of that system?

5 **WITNESS MAYNE:** That's my understanding,
6 yes.

7 **CHAIRMAN CLARK:** And if an area code change
8 was made that affected Tallahassee, you don't know if
9 the local company who provides you with ESSEX would
10 charge you for making the change to their ESSEX
11 service, do you?

12 **WITNESS MAYNE:** No, ma'am, I really don't.
13 I asked my Staff to go back and research this issue,
14 and this is what they gave me. I'm not in-depth
15 knowledge on those tariffs as to whether that would be
16 something that would be covered with the charge or
17 not. I really don't --.

18 **CHAIRMAN CLARK:** Okay.

19 **Q** **(By Mr. Cox)** My next question refers again
20 to your responses in the late-filed exhibit --
21 Late-filed Deposition Exhibit GWM-6, Composite Exhibit
22 14, and that's GWM-5, Page 89. You indicate that a
23 conservative time estimate to change the speed call
24 lists and special routing feature is 10 to 15 minutes,
25 or an estimated labor cost of \$2.50 per line. Why do

1 you believe this is a conservative time estimate?

2 **A** This is what my Staff figured would -- that
3 it would take on the outside to make those types of
4 changes, and that's what they put together.

5 **Q** Do you have any idea of the basis for the
6 estimated labor cost of \$2.50 per line?

7 **A** In discussing this with Staff, my
8 understanding is they went back and they used some
9 average salaries within state government to arrive at
10 that calculation.

11 **COMMISSIONER GARCIA:** Maybe on some of these
12 issues that you don't have background on, maybe you
13 could supply us with a late-filed exhibit, because I
14 think Staff wants to get at some of your numbers as a
15 general indexing of where you are with some of this.

16 **WITNESS MAYNE:** Yes, sir, we would be happy
17 to do that. We tried to do that this time around, and
18 this came up in the depositions, and I'm being asked a
19 lot of things that, quite frankly, I don't have the
20 details on, and I asked staff to put this -- my staff
21 to put this together for them.

22 We'd be happy to go in into whatever -- ever
23 details that you all want. However, I've already
24 stated that the cost is not the real issue here.
25 After looking at this and doing some rough

1 approximations, we can pick at these from now until
2 eternity, and I don't think it's going to get at the
3 real issue that we're concerned about, Commissioner.

4 Q (By Mr. Cox) On Page 5 of your direct
5 testimony, you state that the Division of Retirement
6 estimates that it will cost them \$200,000 to republish
7 and redistribute retirement publications. Referring
8 you to the exhibit that you have attached to your
9 direct testimony, including the letter from the
10 Division of Retirement, doesn't this letter from the
11 Division of Retirement state that it would cost them
12 \$200,000 if the reprinting was done all at once?

13 A That's correct.

14 Q Is it your understanding that there would be
15 a transition period for the implementation of a new
16 area code?

17 A You mean a permissive dialing period?

18 Q Yes.

19 A Yes.

20 Q If that is the case, would it be necessary
21 for the Division of Retirement to reprint all of its
22 publications at once?

23 A I would not think that they would have to do
24 them all at one time, no, sir.

25 Q On Page 5 of your direct testimony you state

1 that given these estimates of cost for these agencies,
2 the agencies that you used to extrapolate your figure,
3 that you can extrapolate among all agencies and arrive
4 at an overall estimated impact figure of \$2,400,000.

5 A Yes.

6 Q And you have sought to explain this
7 extrapolation in your late-filed exhibits; is that
8 correct?

9 A Yes.

10 Q How many agencies, just for my information,
11 now are included in that extrapolation?

12 A I believe we used 31 agencies to arrive at
13 that.

14 Q And how many state agencies currently exist?

15 A Thirty-one.

16 Q So the figures -- you've received figures
17 from all 31 agencies to arrive at this figure?

18 A No, I did not. I extrapolated the
19 information that I received from three agencies and
20 used that to try to get some sort of a feel for what
21 impact it would be on all 31 agencies.

22 CHAIRMAN CLARK: Mr. Mayne, where is that in
23 this exhibit?

24 WITNESS MAYNE: Where is what, Madam
25 Chairman?

1 **CHAIRMAN CLARK:** Maybe I misheard. I
2 thought there was some further information documenting
3 how you did your extrapolation to get to the two and a
4 half million --

5 **WITNESS MAYNE:** If you look at this Exhibit
6 GWM-5 and you look on Page 91, what we did is we
7 listed there the three agencies that we got in contact
8 with and that were willing to provide us with some
9 numbers in the time frame we had to deal with, and
10 then we took an average of those and then we
11 multiplied that by the 31 agencies to get a rough
12 approximation of what we could be going through.

13 Then we multiplied that by 80%, or looked at
14 a 20% reduction, to take into account those smaller
15 agencies that would obviously have a different calling
16 pattern.

17 **COMMISSIONER KIESLING:** Mr. Mayne, I have a
18 question on that. Given that the \$200,000 estimate by
19 the Division of Retirement is only if it's done all at
20 one time -- which there's no evidence it shows it
21 would have to be done at one time, it could be done
22 over the period of phase-in -- by the time you do
23 averaging, doesn't that throw your number off?

24 **WITNESS MAYNE:** Oh, it certainly does, and
25 at the time we put this together, we had a relatively

1 short time fuse to work on. And my question to these
2 agencies was what happens if the area code changes,
3 what are you going to have to do.

4 At the time we were not totally aware of the
5 permissive dialing. That's why I say that the cost
6 impact really is not the major issue here. We tried
7 to put together a very rough estimate of cost, just
8 tried to get a feel for what would happen to state
9 government. And I think you're absolutely correct;
10 this is a worst case number.

11 COMMISSIONER KIESLING: Would you agree with
12 me that it's even beyond a worst case number in the
13 sense that the underlying assumption that supports the
14 \$200,000 is not a correct assumption?

15 WITNESS MAYNE: There's a good possibility
16 of that, yes, ma'am.

17 COMMISSIONER KIESLING: Thank you.

18 Q (By Mr. Cox) Mr. Mayne, I have one further
19 question along this line. You just stated that you
20 reduced the total cost reduced by a percentage to take
21 into account the different calling patterns by some of
22 the smaller agencies.

23 A Yes.

24 Q Could you explain why different calling
25 patterns would change the cost of implementing a new

1 area code?

2 A I think that would -- what we were basing
3 that on is that would be those agencies that would not
4 have as many publications going out, that didn't have
5 that much interaction with the public is what we were
6 trying to do there.

7 Q I'm still not quite understanding the
8 relationship of the publications to calling patterns.

9 A The smaller agencies we felt like would be
10 receiving less calls than some of these that we
11 called. We called the ones that really had the high
12 volume, the ones that have the most traffic coming
13 through our directory assistance, and so we recognized
14 that some of the smaller agencies would not have that
15 many calls and would probably have a much less impact
16 on them.

17 Q When you were requesting cost data from the
18 state agencies, did any of the agencies indicate that
19 there would be no cost for implementing a new area
20 code in Tallahassee?

21 A I had one of the agencies I talked to that
22 was on the high volume list that said they didn't
23 think it would have any impact on them; that's
24 correct.

25 Q Which agency was that?

1 **A** Department of Highway Safety and Motor
2 Vehicles.

3 **Q** Did you include that agency in your
4 extrapolation discussed above?

5 **A** Yes, we did, by the formula we used. The
6 reason that we have that like that is we had to make
7 that calculation before I finally got some input from
8 them.

9 **Q** Would the state incur some of the costs that
10 we've discussed earlier today no matter where a new
11 area code would be implemented?

12 **A** Yes. I would think some of that would be in
13 effect, yes.

14 **Q** What would some of those costs be?

15 **A** Well, I think if you've got some district
16 offices from some of the agencies located in another
17 area and that area code changed, you could have to
18 have some reprint dealing with that.

19 **Q** Do you have any estimates on those costs?

20 **A** No, I don't.

21 **Q** Do you know or have an estimate on the cost
22 that the state would occur if the new area code were
23 implemented in the Jacksonville and Daytona LATA?

24 **A** No.

25 **Q** Would you agree that all business and -- all

1 business customers would incur some costs for
2 implementing a new area code that affected their area?

3 A I think that's true.

4 Q I'd like to refer you to Page 5 and 6 of
5 your direct testimony. You did state that the
6 Tallahassee market area holds the community of
7 interest for 14 million Florida citizens and the
8 general public, and that there are numerous state
9 agencies that provide consumer assistance in dealing
10 with complaints, licenses, registrations, permits,
11 taxes, et cetera. Do you know how many state agencies
12 have regional offices?

13 A Not all of them. I know some of them, but
14 not all of them.

15 Q Do you have any idea what percentage that
16 might be?

17 A No, I really don't.

18 Q Do you know how many state agencies use 800
19 numbers for incoming calls from consumers or citizens?

20 A It would just be a guess on my part.

21 Q Do you have any estimate on that?

22 A I would think that a relatively high
23 percentage of them have at least some form of 800
24 number, probably 70% or so, but that's just a guess.

25 Q So in your opinion how would most customers

1 get telephone information for contacting a state
2 agency?

3 A I'm sorry. What question are you asking?

4 Q The question I'm asking is, how would most
5 consumers get the required telephone information that
6 they would need for contacting a state agency?

7 A Oh, I would think it would come from a
8 variety of sources. That's one of our big concerns,
9 is a lot of documents floating around with numbers
10 embedded within the text is one of our biggest
11 concerns. They've got a variety of sources they can
12 look at. They can look at directory assistance. They
13 can look at blue pages. They can look at
14 publications. They can look at a wide variety of
15 information to get telephone numbers.

16 Q So you would agree that there would be quite
17 a few that would utilize directory assistance and blue
18 pages and basically telephone books?

19 A I would think so.

20 Q Could you look at Exhibit GM -- GWM-6, which
21 is Exhibit 3 in this proceeding. Staff has taken two
22 excerpts from two different telephone books, one from
23 Miami and another from ALLTEL. Could you look at the
24 government listings there and tell me how many
25 telephone numbers are listed that have a telephone

1 number for a Tallahassee office, first from Miami and
2 then for ALLTEL?

3 A This copy is kind of blurry here. You want
4 me to look for all of them that are Tallahassee
5 numbers?

6 Q Are there any that seem to be dialing into
7 the Tallahassee area? I guess by way of a 904 area
8 code is what you would look for.

9 A No, there don't seem to be any.

10 Q My last set of questions refers to Page 6 of
11 your direct testimony, Line 10. In Line 10, Page 6 of
12 your direct testimony you state that the letters from
13 the state agencies attached to your testimony voice
14 significant concerns about the public confusion and
15 irritation that is likely to result with the 904 area
16 code change in Tallahassee, and I believe you
17 discussed that in your summary here today. Isn't some
18 of this concern raised by these agencies minimized if
19 the agency has a regional office?

20 A I think some of it could be minimized there,
21 but let me go back and reflect on what we're looking
22 at here with the 110,000 calls a day that are coming
23 in -- which we provided in this exhibit and updated --
24 that reflect those calls that come from -- not from
25 800 calls -- or not from Suncom, but come directly in

1 from the public.

2 And what we've done is we've gone back to
3 our own change, and we've looked at a one-digit change
4 that occurred a year ago, and taken some pretty
5 concise measurements on what is the number of
6 misdialings that we have a year after permissive
7 dialing. What we're seeing is that the total dialing
8 area is still on the order of 2.7%. If you apply that
9 to these incoming calls, we can have about 3,000
10 misdialed calls a day coming in one year after
11 permissive dialing, if indeed this same trend goes
12 back.

13 Now, if you go back to when we first cut
14 over and first came off of permissive dialing, we went
15 back and checked some of the data, and it looks like
16 we're up on the order of 10%. So if you take that and
17 apply that to this 110,000 calls coming from the
18 public, it is conceivable that we could have somewhere
19 on the order of 9,000 to 3,000 misdialed calls a day
20 coming in during that first year after permissive
21 dialing.

22 Now, one can take the argument, well, it
23 does not apply, because what I'm dealing with are
24 numbers of the Suncom network which only reflect state
25 and local government qualified users. However, we're

1 talking about human nature here, and I think it's
2 reasonable to at least try to project that out and see
3 what level of magnitude that you've got.

4 Q You mentioned earlier that you figured out
5 the amount of numbers that would be misdialed or
6 incorrectly dialed. Do you have any idea how many of
7 those incorrectly dialed numbers would be due to the
8 failure to dial a 1 before the area code and number?

9 A I think that's the majority of them, but I'd
10 have to go back and do some more research; but my gut
11 feel would be that would be the majority of it.

12 Q When a new area code is implemented, is
13 there a intercept placed on the NXXs that have changed
14 after permissive dialing is over?

15 A My understanding is there is.

16 Q If that's the case, wouldn't this minimize
17 some of the confusion and irritation that consumers in
18 Florida would undergo?

19 A I don't know. Dealing with the public you
20 get an awful lot of calls after folks hit that two or
21 three times. Then they get rather frustrated and they
22 can come at you from another direction. That's been
23 my experience.

24 Q Back to that issue of the incorrectly dialed
25 numbers. Isn't some of the reason for the dialing

1 problems is that you change the number of digits
2 dialed and not just the number you are dialing?

3 A We did change the number of digits that were
4 dialed on the Suncom call, yes; and that's definitely
5 part of the problem. But I would add, that's a
6 one-digit change we had.

7 We spent a lot of time talking and trying to
8 train folks. In dealing with an area code change,
9 you're really talking about changing three digits that
10 the public has to deal with.

11 Q Mr. Mayne, do you know how many new area
12 codes have been implemented in Florida over the past
13 two years?

14 A Not exactly.

15 Q Would you agree, subject to check, that
16 there have been several?

17 A Oh, yes.

18 Q Would you agree that most customers in
19 Florida have been affected, either directly or
20 indirectly by an area code change in the past two
21 years?

22 A Probably so, yes.

23 Q Then wouldn't it be reasonable to believe
24 that most customers in Florida would understand the
25 need for new area codes and understand that if the

1 state -- and they would understand that the state
2 might need to change their area code?

3 A I think they would understand the need for
4 changing the area code to get more telephone numbers.
5 I think one could also make an argument for they may
6 say, why in the devil did we change the area code of
7 the capital city, because that's where we have to call
8 quite often.

9 Q (Pause)

10 COMMISSIONER GARCIA: While they're down,
11 let me just ask you about the public perception, not a
12 technical question. Why does the government get to
13 keep their area code while we here in Jacksonville or
14 somewhere else have to exchange our area codes, or
15 Broward County or wherever it may be in the state?
16 You do understand the sort of antigovernment feeling
17 that there is sometimes out there?

18 A Yes, sir, I do. I'm very much aware of
19 that. And I think one of the issues we've tried to
20 address in dealing with that is going back and looking
21 and try to see exactly how many of these calls do we
22 have coming in here based on the size of population
23 that we have in this town. And it's our opinion that
24 we still reflect a pretty good size community of
25 interest here in Tallahassee, and these 2.2 million

1 calls a month, based on our population size, leads us
2 to feel that that's still a reasonable case to take.

3 Q (By Mr. Cox) Mr. Mayne, Staff just has one
4 final question. That was regarding the figure that
5 you just discussed earlier, how you extrapolated the
6 110,000 calls per day, two million per year. Now,
7 does that figure include Suncom numbers?

8 A I think we went back to the exhibit and took
9 that out. Let me see if I can -- one of these pieces
10 of paper that you handed me I think had that on it.

11 If you look at your piece of paper called ID
12 GWM-7 that you gave me earlier --

13 Q Yes.

14 A -- and then look at the third page in that
15 document, the one that said "Late-Filed Exhibit GWM-8,
16 this is the one that we had to update based on some
17 erroneous communications we had with our switch
18 engineers.

19 What we tried to do there was put all of the
20 data down, and we subtracted out the local traffic.
21 We also took out the nonstate numbers and then removed
22 the Suncom numbers and the 800 numbers. So when we
23 arrived at that 2.2 million, I believe that we took
24 out everything except that would be coming into the
25 public. That's what were trying to arrive it. So I

1 think this exhibit answers your questions.

2 MR. COX: Thank you, Mr. Mayne. That
3 concludes Staff's questions.

4 CHAIRMAN CLARK: Commissioners, do you have
5 any questions? Redirect, Mr. Mathues?

6 MR. MATHUES: I have no redirect, but I, in
7 a housekeeping move, want to make sure that I had
8 moved Exhibits 1 through 4 which were a part of the
9 direct testimony.

10 CHAIRMAN CLARK: All right. GWM-1 through
11 4, which are identified as Exhibit 13, will be entered
12 in the record without objection.

13 (Exhibit 13 received in evidence.)

14 MR. MATHUES: Thank you very much.

15 MR. COX: Chairman Clark, Staff moves
16 Composite Exhibit 14 into the record -- and requests
17 that Composite Exhibit 14 be moved into the record.

18 CHAIRMAN CLARK: Composite Exhibit 14 will
19 be entered in the record without objection. Thank
20 you, Mr. Mayne.

21 (Exhibit 14 received in evidence.)

22 CHAIRMAN CLARK: Mr. McCabe.

23 MR. BEATTY: Madam Chairman, can I approach
24 for a brief moment?

25 COMMISSIONER KIESLING: Sure.

1 **MR. ERWIN:** While he's doing that, I'll go
2 and see if I can find my witness.

3 **CHAIRMAN CLARK:** Just for the record,
4 Mr. Beatty will be excused from further appearance
5 here at this hearing, and I suppose Ms. White will
6 take over; is that correct?

7 **MS. WHITE:** That's correct.

8 **CHAIRMAN CLARK:** Mr. Erwin.

9

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10 **THOMAS M. MCCABE**
11 was called as a witness on behalf of Quincy Telephone
12 Company et al and, having been duly sworn, testified
13 as follows:

14 **DIRECT EXAMINATION**

15 **BY MR. ERWIN:**

16 **Q** Could you please state your name and address
17 and affiliation, please?

18 **A** Thomas M. McCabe, P.O. Box 189, Quincy
19 Florida, 32353-01899, and I'm employed by TDS Telecom,
20 the parent company of Quincy Telephone Company.

21 **Q** Mr. McCabe, did you prepare and file in this
22 docket prefiled testimony?

23 **A** Yes, I did.

24 **Q** And if I were to ask you the same questions
25 under oath today that you answered in your prefiled

1 testimony, would your answers be substantially the
2 same?

3 A Yes.

4 MR. ERWIN: I would request that the
5 testimony be inserted in the record as though read.

6 CHAIRMAN CLARK: I'm having trouble with
7 "substantially the same."

8 Q (By Mr. Erwin) Would they be exactly the
9 same, Mr. McCabe?

10 A Yes.

11 CHAIRMAN CLARK: All right. The prefiled
12 direct testimony of Mr. McCabe consisting of 6 pages
13 will be inserted in the record as though read.

14 MR. ERWIN: You might always find a
15 grammatical error or something.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
PREPARED DIRECT TESTIMONY
OF
THOMAS M. McCABE

- 1 Q. Please state your name and business address.
- 2 A. My name is Thomas McCabe. My business address is P. O.
3 Box 189, Quincy, Florida 32353-0189.
- 4 Q. By whom and in what capacity are you employed?
- 5 A. I am employed by TDS Telecom, the parent company of
6 Quincy Telephone Company as Manager, External
7 Relations.
- 8 Q. Please describe your background and experience.
- 9 A. I am a graduate of the University of North Carolina at
10 Charlotte with a B.A. in Economics. I have been
11 employed at TDS Telecom since December 1995, as
12 Manager, External Relations for Florida and Georgia.
13 Prior to joining TDS telecom, I worked as a
14 telecommunications consultant with New Paradigm
15 Resources Group located in Chicago, Illinois. From
16 1986 to April 1995, I was employed by the Florida
17 Public Service Commission where I held various
18 positions in the Division of Communications and the
19 Division of Research and Regulatory Review.
- 20 Q. What is the purpose of your testimony?
- 21 A. The purpose of my testimony is to present Quincy
22 Telephone Company's position on the three options that
23 have been presented to the Florida Public Service
24 Commission for providing area code relief in the 904

- 1 numbering plan area.
- 2 Q. Was the industry able to reach a consensus on the
3 relief options available for the 904 NPA?
- 4 A. Yes. The industry reached a consensus that the 904 NPA
5 should be split along LATA boundaries. However, the
6 industry was not able to reach a consensus on which
7 LATAs should be split from the 904 NPA.
- 8 Q. Can you please describe the three options that have
9 been promoted by the industry code holders for
10 splitting the 904 NPA along LATA boundaries?
- 11 A. Yes. The three options proposed by the industry code
12 holders are:
- 13 Option 1: Assign new NPA to Pensacola, Panama City,
14 and Tallahassee LATAs,
- 15 Option 1A: Assign new NPA to Jacksonville and Daytona
16 LATAs, and
- 17 Option 2: Assign new NPA to Pensacola and Panama City
18 LATAs.
- 19 Q. Can you please explain the industry objectives in
20 providing NPA relief?
- 21 A. Yes. The industry objectives are 1) to provide the
22 longest relief period, 2) minimize number changes, and
23 3) minimize technical and operational impacts. These
24 objectives are consistent with the ICCF NPA Code Relief
25 Guidelines.

1 Q. In evaluating the various options for relief, what is
2 Quincy Telephone Company's position regarding
3 implementation of a new NPA along LATA boundaries?

4 A. Quincy Telephone Company supports option 1A, which
5 assigns a new NPA to the Jacksonville and Daytona
6 LATAs.

7 Q. Do you believe that Option 1A is consistent with the
8 industry objectives?

9 A. Yes. As stated in BellSouth's petition for approval of
10 Numbering Plan Area (NPA) relief for the 904 area
11 codes, with respect to exhaust dates, the impact to the
12 respective LATAs would be the same under Options 1A and
13 Option 1. Thus, Option 1A meets the industry objective
14 to provide the longest relief possible.

15 Q. Isn't it true that Option 1 best meets the industry
16 guidelines to minimize number changes?

17 A. Quincy Telephone Company acknowledges that Option 1
18 would impact a smaller number of customers and NXXs.
19 However, we believe that the impact to customers is
20 subjective since a change in area code will impact each
21 customer on an individual basis. Additionally, Quincy
22 Telephone Company agrees with the position advocated by
23 the Department of Management Services (DMS) that
24 changing the Tallahassee LATA will have a significant
25 and far reaching impact on state government.

1 Q. If the Florida Public Service Commission does not adopt
2 Option 1A, does Quincy Telephone Company have an
3 alternative position?

4 A. Yes. In the alternative, Quincy Telephone Company
5 supports Option 1.

6 Q. Please explain.

7 A. If the Commission rejects Option 1A, then by adopting
8 Option 1 the Commission will still be able to provide
9 relief for the greatest period of time. Under Option 1
10 the 904 NPA for Jacksonville and Daytona LATAs would be
11 expected to exhaust in September 2002. The 850 NPA for
12 Pensacola, Panama City and Tallahassee LATAs would be
13 expected to exhaust in November 2006. If the
14 Commission adopts Option 2, the 904 NPA would be
15 expected to exhaust in October 2000 and the industry
16 will be back before the Commission within the next two
17 years to prepare for another NPA split.

18 Q. Are there additional reasons why Quincy Telephone
19 Company supports Option 1 as an alternative?

20 A. Yes. Quincy Telephone Company could support Option 1
21 because the company would maintain the same NPA as
22 Tallahassee. Because there exists a strong community
23 of interest between Quincy and Tallahassee, it is
24 essential to our customers to maintain seven digit
25 dialing for local calls between Quincy and Tallahassee.

- 1 Q. Isn't it true that seven digit dialing between Quincy
2 and Tallahassee can continue regardless of whether the
3 Panama City and Tallahassee LATAs have the same NPA?
- 4 A. Yes. The technology exists to allow for seven digit
5 dialing between LATAs. However, it would create an
6 inefficient use of NXX codes because codes would also
7 need to be protected to maintain local calling between
8 the Panama City and Tallahassee LATAs.
- 9 Q. If the Commission adopts Option 2, does Quincy
10 Telephone Company have any recommendations?
- 11 A. Yes. If the Commission adopts Option 2, Quincy
12 Telephone Company requests that the Commission require
13 the necessary codes be protected to allow for seven
14 digit dialing for local calls between the Panama City
15 and Tallahassee LATAs. We would request that these
16 codes be protected for as long as possible.
- 17 Q. When should the area code relief be implemented?
- 18 A. Quincy Telephone Company supports the implementation
19 time table set forth in BellSouth's Petition.
20 Permissive dialing should begin February 24, 1997 and
21 mandatory dialing should begin February 23, 1998.
- 22 Q. Please summarize your testimony.
- 23 A. Quincy Telephone Company recommends that the Commission
24 adopt Option 1A. In the alternative Quincy Telephone
25 Company supports Option 1. Both Options 1 and 1A

1 provide NPA relief for the greatest period of time.

2 Additionally, both Options 1 and 1A will have a

3 minimal, if any, impact on local calling

4 associated with extended area service.

5 Q. Does this conclude your testimony?

6 A. Yes.

1 Q (By Mr. Erwin) Mr. McCabe, do you have a
2 summary of your testimony?

3 A Yes, I do.

4 Q Do you care to make that at this point?

5 A Quincy Telephone Company recognizes that any
6 of the three options outlined in BellSouth's petition
7 and the option recommended by St. Joe Telephone
8 Company will have an adverse impact on customers and
9 understands the desire to minimize the impact on the
10 fewest numbers of customers.

11 Quincy Telephone Company recommends that the
12 Commission adopt Option 1A, which would assign the new
13 area code to Jacksonville and Daytona LATAs. In the
14 alternative, Quincy Telephone Company can support
15 Option 1, which would assign the new area code to
16 Tallahassee, Panama City and Pensacola LATAs.

17 This option would ensure that the
18 seven-digit dialing pattern between Tallahassee and
19 Quincy would be preserved. This is extremely
20 important to Quincy Telephone Company and its
21 customers because of the strong community of interest
22 between Quincy and Tallahassee.

23 Additionally, Quincy Telephone Company
24 supports -- can support the option presented by
25 St. Joe by Mr. Bowden on the use of three area codes.

1 Q Did you have anything additional that you
2 wish to add to your testimony that was not prefiled?

3 A No.

4 MR. ERWIN: I tender the witness for
5 cross-examination.

6 CHAIRMAN CLARK: Ms. White.

7 CROSS EXAMINATION

8 BY MS. WHITE:

9 Q Good after, Mr. McCabe. I just have a few
10 questions for you today. Mr. McCabe, are you familiar
11 with the ICCF NPA code relief guidelines?

12 A Yes.

13 Q And I believe on Page 2 of your testimony,
14 Lines 21 through 23, you talk about the industry
15 objectives for an NPA split, which are to provide the
16 longest relief period, minimize number changes and
17 minimum technical and operational impact. Do you
18 agree with those industry objectives?

19 A Yes.

20 Q And would you agree that -- well, according
21 to your testimony, those objectives are consistent
22 with the guidelines; is that correct?

23 A The guidelines offered by the ICCF, yes.

24 Q Now, I'm not quite sure I understand what
25 you're supporting here, but let's take the first one.

1 I think your first choice is Option 1A; is that
2 correct?

3 A Yes, it is.

4 Q And that's the option which assigns a new
5 NPA to Pensacola, Panama City, and Tallahassee; is
6 that correct? No, I'm sorry.

7 A No.

8 Q I apologize. I'm confusing myself. That's
9 the option that assigns a new NPA to Jacksonville and
10 Daytona Beach.

11 A That's correct.

12 Q And then the 904 would remain with
13 Tallahassee, Pensacola and Panama City?

14 A Yes.

15 Q And would you agree under that option that
16 the 904 area code would exhaust in 2006?

17 A Yes.

18 Q And would you agree that the new NPA for
19 Jacksonville and Daytona would exhaust in 2002?

20 A Yes.

21 Q Now, Option 1A, would you agree that
22 Option 1A affects the greatest number of subscribers?

23 A I would agree that it does.

24 Q And would you agree that Option 1A affects
25 the greatest number of NXXs?

1 A Yes.

2 Q And that is that consistent with the NPA
3 code relief guidelines?

4 A I guess the answer would be no, but I think
5 that these are just guidelines. At the time that we
6 filed our testimony, the guidelines that were laid out
7 before us at the original meeting with BellSouth
8 stated those three guidelines that are found in the
9 testimony.

10 Since then, it came to our understanding
11 that the ICCF has also recently revised those
12 guidelines and they're now offering two NPAs, which
13 seems to be, I guess -- it seems that the guidelines
14 continue to change often, that they're not set in
15 stone. And I do agree that there is a greater number
16 of customers that would be impacted under Option 1A,
17 but I don't think that the Commission is limited to
18 what those guidelines say in its decision.

19 Q You say that the guidelines have been
20 revised. Can you tell me how they've been revised?

21 A I do not have the revisions. I saw that in
22 the telecommunications report that was the latest
23 month indicated that the ICCF guidelines had been
24 revised.

25 Q But you're not familiar with what the

1 revision --

2 A No.

3 Q -- substance of the revision is?

4 A In the report it only indicated that the
5 ICCF guidelines support the issuance of two area
6 codes.

7 Q Now, if Option 1A is approved by this
8 Commission, then we've already said that the new area
9 code will go to Jacksonville and Daytona; is that
10 correct?

11 A Yes.

12 Q And that new area code would exhaust in
13 2002; isn't that correct?

14 A Yes.

15 Q So before 2002, Jacksonville and Daytona
16 would have go through another NPA code split; isn't
17 that correct?

18 A That is correct.

19 Q So those communities would require a new
20 area code less than five years after this change?

21 A Yes.

22 Q Now, isn't it true that the NPA relief
23 planning guidelines recommend that customers who
24 undergo number changes shouldn't be required to change
25 again for a period of eight to 10 years?

1 A Yes.

2 Q So Option 1A could be considered a violation
3 of that part of the guidelines; isn't that correct?

4 A Yes.

5 Q Now, are you familiar with the fact that
6 alternative local exchange companies are entering the
7 market in Florida?

8 A Yes.

9 Q And would you agree that new entrants are
10 more likely to appear in larger areas like Jackson
11 rather than smaller areas? Jacksonville -- excuse
12 me -- rather than smaller areas.

13 A I would agree.

14 Q And if that is the case, then the new
15 entrants, these new ALECs, will be affected by two NPA
16 changes in less than five years, will they not?

17 A For those that come in before the NPA, yes,
18 they would.

19 Q Now, your second option that you're
20 recommending is Option 1; is that correct?

21 A Yes.

22 Q And that's the option that assigns the new
23 NPA to Pensacola, Panama City and Tallahassee with 904
24 remaining with Jacksonville and Daytona?

25 A Yes.

1 Q And that's your second preference; correct?

2 A Yes, it is.

3 Q And then your third preference is the
4 three-way split discussed by Mr. Bowden in his direct
5 testimony?

6 A Yes, it is.

7 Q And Mr. Bowden suggested in his testimony
8 that Jacksonville LATA be given a new NPA and that
9 Daytona be given a new NPA and that Tallahassee,
10 Panama City and Pensacola remain 904; is that correct?

11 A That's correct.

12 Q And in that instance in his testimony would
13 you agree that the exhaust date for the Jacksonville
14 LATA would be 2007 and the exhaust date for the 904
15 area code would be 2006? Does that sound about right?

16 A That sounds about right.

17 Q And would you also agree that the new
18 exhaust date for the Daytona Beach NPA would be 2033?

19 A Yes, I would.

20 Q And would you agree that that also violates
21 the guideline recommendation that NPAs last for a
22 period of eight to 10 years?

23 A No, I don't believe so, and this is why: If
24 you were to adopt Option 1, in two years from now or
25 three years from now you would come back before this

1 Commission asking for area code relief again. It
2 would appear at that point in time that the only
3 logical place to make an area code split would be the
4 Jacksonville/Daytona LATA.

5 So, in effect, three years from now you
6 would be back in here recommending that the Daytona
7 LATA be assigned a new area code in which that exhaust
8 date would be 2030. So it's just a matter of whether
9 you do it today or whether you do it in three years.

10 Q Now I'm confused. You said if you adopt --
11 Commission adopts Issue 1 --

12 A Yes.

13 Q -- then we'll all be back here asking for
14 assistance in 2002?

15 A That's correct.

16 Q And that's for the 904 area code. Is that
17 what you meant?

18 A Yes.

19 Q We'll all be back --

20 A Yes, that's correct.

21 Q Okay. But the 904 area code -- let me take
22 that back. With regard to an NX -- excuse me -- an
23 NPA code that lasts until 2033, or for a period longer
24 than 10 years, do you foresee any problem in the
25 underutilization of NXX codes in that case?

1 A I would imagine that that would be a
2 concern. However, that is a situation that you will
3 be in when you come back before the Commission
4 requesting a new area code for 904 in the year 2002.
5 You will need to go ahead and issue a new area code
6 for the Jacksonville/Daytona LATA, which will then
7 again put you in a situation where you have the
8 Daytona LATA with an exhaust of 2030.

9 Q Well, but if you come back at 2002, they
10 could put -- the Commission could put Jacksonville in
11 a new NPA, couldn't it?

12 A They could, but then that would leave
13 Daytona Beach with a 904 NPA, and it would still end
14 up in a 2030 exhaust date, because under Option 1,
15 you've got -- I'm sorry. Okay. That's correct. And
16 then you would be in a situation where you would then,
17 if you gave Jacksonville the 904 -- now I'm getting
18 real confused.

19 Q I know. I don't know whether I've done it
20 or we've both done it. Let me go back. We started
21 out --

22 MR. ERWIN: I think the confusing thing here
23 is that we're throwing a bunch of things in that have
24 no underlying -- or no basis for any kind of
25 questioning at this point. There hasn't been any kind

1 of talk about splitting the Daytona LATA off and
2 leaving it with Baker County, for example, and then --
3 unless we have some indication as to exactly what
4 counsel wants to use as a hypothetical example,
5 there's going to be some confusion.

6 MS. WHITE: Well, I'm not using anything as
7 a hypothetical example. In one of the answers to his
8 testimony -- in one of the answers to a question,
9 Mr. McCabe said that if you adopt Option 1, you would
10 have to come back anyway in 2002 for another relief;
11 and that's what I'm trying to get some details about,
12 and I think we confused each other in trying to get
13 those details.

14 CHAIRMAN CLARK: Ms. White, why don't you
15 begin your questioning again.

16 Q (By Ms. White) Mr. McCabe, you stated that
17 if this Commission adopted Option 1, then the industry
18 is going to have to come back to this Commission in
19 2002 to seek additional relief. Can you explain that
20 to me?

21 A That's correct. In BellSouth's petition it
22 states that under Option 1, the 904 NPA for
23 Jacksonville and Daytona LATAs would be expected to
24 exhaust in September 2002.

25 Q But that would be the first occasion upon

1 which Jacksonville and Daytona had to make a change;
2 is that correct?

3 A That is correct.

4 Q All right. And under Option 1, Jacksonville
5 and Daytona Beach would not be making a change in '97
6 to '98, 1997 to '98 time frame?

7 A That's correct, but I think when we started
8 with this line of questioning it was on whether it
9 violated the ICCF guidelines, and what I was saying is
10 that in the year 2002 when that 904 area code would
11 need to be split, you would then have the Daytona
12 LATA, in all likelihood, with a new area code with an
13 exhaust date of 2030, which would violate the
14 guidelines. So the question is, is how solid are
15 these guidelines, because they're going to be violated
16 somehow.

17 Q Well, and I think that's where we got
18 confused, because you said when we come back in 2002
19 it would be Daytona that would be split off, and I
20 guess my question back to you is why are you assuming
21 it would be Daytona that would be split off and not
22 Jacksonville?

23 A Regardless, if you were to move -- if you
24 were to say that Daytona is going to now have the 904
25 area code, you would still have an exhaust date of

1 2030.

2 Q In 2002 you would have that?

3 A No.

4 Q I think I'm doing it again.

5 A Under Option 1, you will be having to split
6 off either the Jacksonville or the Daytona LATA in the
7 year 2002. Regardless of which area, which LATA you
8 assign the 904, the Daytona Beach LATA is still going
9 to have an exhaust date of 2030, which would be, you
10 know, well above the guidelines that you refer to with
11 the ICCF.

12 Q And isn't it possible, Mr. McCabe, that in
13 2002 when this Commission has to deal with the 904
14 area code again, under Option 1 this Commission could
15 decide to do an overlay rather than a geographic
16 split?

17 A I assure that the Commission could, yes.

18 MS. WHITE: Thank you. I have nothing
19 further.

20 CHAIRMAN CLARK: Mr. Wahlen?

21 MR. WAHLEN: No questions.

22 CHAIRMAN CLARK: Mr. Mathues?

23 MR. MATHUES: I don't guess I have any
24 questions.

25 CHAIRMAN CLARK: Mr. Herron?

1 **MR. HERRON:** No questions.

2 **CHAIRMAN CLARK:** Ms. Rule?

3 **MS. RULE:** I have a few questions.

4 **CROSS EXAMINATION**

5 **BY MS. RULE:**

6 **Q** Mr. McCabe, there's been some discussion in
7 this docket about implementing an NPA division in a
8 way that would split a LATA boundary that is divided
9 in two. Did industry representatives consider this
10 possibility in meetings?

11 **A** We had discussed that, but we -- the
12 industry agreed that separating along boundary lines
13 would be the best, LATA boundaries.

14 **Q** Why did you reject the possibility of
15 dividing a LATA?

16 **A** One of the things that most of us talked
17 about was the fact that there's a lot of community of
18 interest situations that occur on each side of the
19 LATA that have seven-digit dialing going between.

20 For example, Tallahassee LATA and the Panama
21 City LATA has the Quincy to Tallahassee, which today
22 is seven-digit dialing. If we were to divide along
23 that boundary and assign a new area code to Quincy,
24 they would be stuck with a -- the potential for
25 ten-digit dialing. And that same situation would

1 have -- you'd have that same impact if you divided it
2 between LATAs.

3 Q In other words, splitting the LATA could
4 result in ten-digit dialing for what's now a local
5 call?

6 A Yes.

7 Q One of the industry objectives in
8 implementing NPA relief is minimizing the technical
9 and operational impacts; is that correct?

10 A Yes.

11 Q Which would minimize the impacts? Dividing
12 along a LATA boundary or splitting a LATA?

13 A I would assume dividing along the LATA
14 boundaries.

15 Q And is that because there's some technical
16 and operational details, some programming and
17 technical work that would have to be done if you split
18 a LATA?

19 A Yes.

20 MS. RULE: Thank you. No further questions.

21 CHAIRMAN CLARK: Staff.

22 CROSS EXAMINATION

23 BY MR. PELLEGRINI:

24 Q Mr. McCabe, just one question. What dialing
25 pattern would you propose for those Quincy customers

1 presently in dialing 1 plus seven digits?

2 A I'm sorry. Can you ask the question again?

3 Q If the Commission were to implement either
4 Option 1 or 1A, what dialing pattern would you propose
5 for the customers dialing across NPA boundaries?

6 A We would recommend a seven-digit dialing.

7 MR. PELLEGRINI: We have no further
8 questions.

9 CHAIRMAN CLARK: Commissioners?

10 COMMISSIONER DEASON: I have a question.
11 Mr. McCabe, do you know how many access lines or
12 telephone numbers are available under any given area
13 code? It's a mathematical calculation, I suppose, of
14 some sort.

15 WITNESS McCABE: I do not know. I believe
16 it's 10,000 per NXX, if that's what --

17 COMMISSIONER DEASON: But it's a finite
18 number, and --

19 WITNESS McCABE: Yes.

20 COMMISSIONER DEASON: -- and whatever that
21 number is, that's what it is. I guess my question is,
22 under your preferred 1A, it was pointed out that it
23 would affect the greatest number of access lines and
24 NXXs immediately; is that correct?

25 WITNESS McCABE: Yes.

1 **COMMISSIONER DEASON:** I guess my question is
2 that since there's just a finite number of numbers
3 available under any area code, in the long term -- in
4 the long term, only that number of customers are going
5 to be unaffected by an area code change; is that
6 correct?

7 **WITNESS McCABE:** I'm sorry. I wasn't quite
8 following that.

9 **COMMISSIONER DEASON:** Well, there seems to
10 be some significance placed upon the fact that the
11 guidelines specify that one of the criteria should be
12 to try to affect the minimum number of customers
13 currently.

14 **WITNESS McCABE:** Yes.

15 **COMMISSIONER DEASON:** And I guess that with
16 growth, especially in a state like Florida, that there
17 are going to be customers impacted by an area code
18 change, and the only ones that are not going to be
19 impacted -- we don't know who they are -- but it's a
20 finite number of customers that are not going to be
21 ultimately impacted --

22 **WITNESS McCABE:** Correct.

23 **COMMISSIONER DEASON:** -- it's a question of
24 which geographic region those customers are going to
25 reside. Would you agree with that?

1 **WITNESS McCABE:** Yes, I would.

2 **CHAIRMAN CLARK:** Redirect.

3 **REDIRECT EXAMINATION**

4 **BY MR. ERWIN:**

5 **Q** Mr. McCabe, in the situation where the split
6 in the 904 would need to be made in the
7 Jacksonville/Daytona Beach area in the year 2002, you
8 have indicated pursuant to cross-examination questions
9 that Daytona would remain at the year 2030 for an
10 exhaust date. And isn't it also true that
11 Jacksonville would then remain at the year 2006 for an
12 exhaust date?

13 **A** Yes.

14 **Q** So that would be a four-year period before
15 something had to be done in Jacksonville again; is
16 that correct?

17 **A** Yes.

18 **Q** And that's not in accordance with the
19 guidelines either, is it, for an eight to 10-year
20 exhaust date?

21 **A** Correct.

22 **Q** So that either way, there's going to be --
23 there are going to be various kinds of departures from
24 the guidelines whenever the Jacksonville situation is
25 addressed in the year 2002 unless something is done

1 other than a LATA boundary --

2 A I believe so, yes.

3 MR. ERWIN: I think that's all I had.

4 CHAIRMAN CLARK: Thank you. You're excused.

5 We'll go ahead and take lunch until quarter to 2:00.

6 (Thereupon, lunch recess was taken at 12:50

7 p.m.)

8

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9 CHAIRMAN CLARK: We'll reconvene the
10 hearing. Mr. Wahlen.

11 MR. WAHLEN: Thank you. I understand
12 Mr. Mathues has something.

13 MR. MATHUES: Madam Chairman, can Mr. Mayne
14 be excused to go back to work?

15 CHAIRMAN CLARK: He can be excused.

16 MR. MATHUES: Thank you.

17 MR. WAHLEN: Thank you. Ms. Eudy, have you
18 been sworn?

19 WITNESS EUDY: No, I have not.

20 MR. WAHLEN: Could you swear the witness,
21 please?

22 CHAIRMAN CLARK: Yes. Could you stand and
23 raise your right hand?

24

25

1 **HARRIET E. EUDY**
2 was called as a witness on behalf of ALLTEL Florida,
3 Inc. and, having been duly sworn, testified as
4 follows:

5 **DIRECT EXAMINATION**

6 **MR. WAHLEN:** Would you please state your
7 name?

8 **A** My name is Harriet E. Eudy.

9 **Q** And by whom are you employed?

10 **A** I'm employed by ALLTEL Florida Incorporated.

11 **Q** Ms. Eudy, did you prepare and cause to be
12 filed in this docket prepared direct testimony
13 consisting of six pages?

14 **A** Yes, sir.

15 **Q** Do you have any changes or corrections to
16 your testimony?

17 **A** No, sir, I do not.

18 **Q** If I were to ask you the questions contained
19 in your prepared direct testimony today, would your
20 answers be the same?

21 **A** Yes, sir, they would.

22 **Q** Do you have any exhibits to your testimony?

23 **A** No, I do not.

24 **MR. WAHLEN:** Chairman Clark, we would
25 request that Ms. Eudy's testimony be inserted into the

1 record as though read.

2 **CHAIRMAN CLARK:** It will be inserted in the
3 record as though read.

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ALLTEL FLORIDA, INC.
DOCKET NO. 961153-TL
FILED: 11/01/96

1 **BEFORE THE PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **HARRIET E. EUDY**

5 **Q. Please state your name and business address.**

6
7 **A. My name is Harriet E. Eudy. My business address is 206**
8 **White Avenue, Live Oak, Florida 32060.**

9
10 **Q. By whom and in what capacity are you employed?**

11
12 **A. I am employed by ALLTEL Florida, Inc. ("ALLTEL" or the**
13 **"Company") as Manager, Regulatory Matters.**

14
15 **Q. Please describe your educational background.**

16
17 **A. I was graduated from North Florida Junior College in 1966**
18 **with an Associate in Arts degree. I began working for**
19 **North Florida Telephone Company (now ALLTEL Florida) in the**
20 **accounting and cost separations areas. I became a**
21 **supervisor in the regulatory department in 1987, and I have**
22 **held my current position in that department since 1991.**

23
24 **Q. What is the purpose of your testimony?**

25

- 1 A. The purpose of my testimony is to present evidence in
2 support of Option 1 as the appropriate method of providing
3 area code relief in the 904 numbering plan area.
4
- 5 Q. To what degree will your Company be impacted by a decision
6 in this docket?
7
- 8 A. In Florida, ALLTEL serves more than 74,000 access lines in
9 27 exchanges. More than 62,000 of those access lines, or
10 21 exchanges, are located in the Jacksonville LATA. If the
11 relief plan that is ultimately adopted results in number
12 changes for existing 904 customers in the Jacksonville
13 LATA, we will be impacted significantly. Switch
14 programming would be required to change all existing
15 customers' numbers and to program our switches to recognize
16 this code in routing future traffic. Operational Support
17 Systems ("OSS"), including billing, customer service,
18 repair reporting and testing, would need to be updated.
19 Additional administrative expense will be incurred to
20 provide customer notification of the changes and respond to
21 customer inquiries and/or complaints. Also, like other
22 businesses that experience number changes, our Florida
23 operation will be required to change all of its stationery,
24 business forms, etc. to reflect the new area code, since
25 these offices are also located in the Jacksonville LATA.

- 1 Q. To what degree will ALLTEL's customers be impacted by a
2 decision in this docket?
3
- 4 A. ALLTEL's customers will be significantly impacted by a
5 decision in this docket if the plan that is ultimately
6 adopted results in a change in the area code for the
7 Jacksonville LATA. Business customers will be required to
8 change their business forms, stationery, and other places
9 their number is published to reflect the new area code.
10 Customers in several of our exchanges, which are contiguous
11 to the Gainesville LATA, have recently felt the impact of
12 another area code change when the Gainesville LATA received
13 a new code. ALLTEL received a number of calls from
14 customers who are located close to the Gainesville area and
15 were confused by the change. Another split would be
16 something of a "double whammy" for these customers.
17
- 18 Q. What are the industry objectives in providing for NPA
19 relief?
20
- 21 A. The industry objectives are to (1) provide the longest
22 relief period, (2) minimize the number of customers who
23 require changes, and (3) to minimize technical and
24 operational impacts.
25

- 1 Q. Have you reviewed the various options under consideration
2 in this docket for area code relief?
3
- 4 A. Yes, I have.
5
- 6 Q. Which of the options do you believe best meets the industry
7 objectives?
8
- 9 A. Option 1 best meets the industry objectives.
10
- 11 Q. Please describe Option 1.
12
- 13 A. Under Option 1, the Pensacola, Panama City, and Tallahassee
14 LATAs would receive a new area code. Jacksonville and
15 Daytona LATAs would retain the 904 area code.
16
- 17 Q. Why does Option 1 best meet the industry objectives?
18
- 19 A. Option 1 provides the greatest relief for the most amount
20 of time for both the new NPA and the old (904) NPAs as
21 determined by BellSouth, the code administrator for the 904
22 NPA, and as noted in their petition to the Commission, item
23 82, filed September 9, 1996. The 904 NPA for the
24 Jacksonville and Daytona LATAs would be expected to exhaust
25 in September 2002. The new NPA for the Pensacola, Panama

1 City, and Tallahassee LATAs would be expected to exhaust in
2 November 2006.

3

4 Q. If the Commission does not adopt Option 1 as the
5 appropriate solution, what other option do you feel best
6 meets the industry objectives?

7

8 A. Option 2 seems to meet the objectives as a second choice
9 because it impacts fewer subscribers and NXXs than Options
10 1 and 1a; however, this approach provides a shorter relief
11 interval than those options. Under Option 2, the 904 NPA
12 would be expected to exhaust in October 2000.

13

14 Q. Please describe Option 2.

15

16 A. Under Option 2, the Pensacola and Panama City LATAs would
17 receive a new area code. The Tallahassee, Jacksonville,
18 and Daytona LATAs would retain the 904 NPA.

19

20 Q. Why is Option 1a inappropriate?

21

22 A. Option 1a would impact a greater number of subscribers and
23 NXXs than Option 1; however, the exhaust dates to the
24 respective LATAs would remain the same.

25

1 Q. Please summarize your testimony.

2

3 A. ALLTEL believes that Option 1 should be adopted for area
4 code relief for the 904 NPA. Option 1 best meets the
5 industry objectives to provide the longest term relief,
6 while minimizing the number of customers that will be
7 impacted by the change.

8

9 Q. Does that conclude your testimony?

10

11 A. Yes, it does.

1 **Q** **(By Mr. Wahlen) Would you please summarize**
2 **your testimony?**

3 **A** **Yes, sir. ALLTEL believes that Option 1**
4 **should be adopted for area code relief for the 904**
5 **area. Option 1 best meets the objectives of the**
6 **industry to provide the longest term relief while**
7 **minimizing the number of customers that will be**
8 **impacted by the change and minimizing customer**
9 **confusion. Thank you.**

10 **MR. WAHLEN: Thank you. Ms. Eudy is**
11 **available for cross examination.**

12 **CHAIRMAN CLARK: Mr. Erwin.**

13 **MR. ERWIN: I have no questions.**

14 **CHAIRMAN CLARK: Mr. White.**

15 **MS. WHITE: No questions.**

16 **CHAIRMAN CLARK: Mr. Mathues.**

17 **MR. MATHUES: No questions.**

18 **CHAIRMAN CLARK: Mr. Herron.**

19 **MR. HERRON: No questions.**

20 **CHAIRMAN CLARK: Ms. Rule.**

21 **MS. RULE: Yes.**

22 **CROSS EXAMINATION**

23 **BY MS. RULE:**

24 **Q** **Ms. Eudy, have you had a chance to look at**
25 **AT&T's statement of basic positions?**

1 **A** Just briefly. I have reviewed it, yes.

2 **Q** And would you agree that it's true for us?

3 I mean, that the facts stated there are true for us
4 about dividing a LATA?

5 **A** I agree with the concept that you have
6 presented. As far as all of the technical details, I
7 can't quite speak to those, but, yes, I agree with
8 your basic concept.

9 **MS. RULE:** No further questions.

10 **CHAIRMAN CLARK:** Staff.

11 **CROSS EXAMINATION**

12 **MR. PELLEGRINI:** Ms. Eudy, I'm Charlie
13 Pellegrini on behalf of Staff.

14 **A** Good afternoon.

15 **Q** Just a couple of questions. First,
16 BellSouth is proposing to require customers to dial 1+
17 10 digits for local calls between NPAs. You are aware
18 of that?

19 **A** Yes, sir, somewhat.

20 **Q** If this Commission were to implement Option
21 1, would that create a problem in that respect for
22 ALLTEL?

23 **A** The problem of EAS across the NPA boundaries
24 is going to be a problem with whatever plan that is
25 implemented. It's just to what degree that situation

1 exists. And that will be totally dependent on the
2 number of EAS routes that are involved. We are
3 concerned in every case with that situation, yes, sir.

4 Q What would be a preferred dialing pattern
5 for such questions in the event that Option 1 is
6 adopted by the Commission?

7 A We would prefer to preserve seven-digit
8 dialing as long as it's technically possible.

9 Q Ms. Eudy, let me refer you to the exhibit
10 marked 2 in this proceeding. Staff will bring you a
11 copy.

12 A Thank you. (Witness tendered document.)

13 Q This is an excerpt from the 1996/1997
14 Florida Telecommunications Industry Association
15 Membership Directory.

16 A Yes, sir.

17 Q I'd like to ask you if you can tell us on a
18 LATA basis -- or rather for the Jacksonville LATA in
19 your case, the number of business access lines and
20 residence access lines?

21 A I can do it if I have the detail that backs
22 this up. We have six exchanges that are located in
23 the Gainesville LATA, and the remaining 21 exchanges
24 are located in the Jacksonville LATA. So it would
25 just be a matter of summarizing the numbers for that

1 particular LATA.

2 Q Okay. I would ask you to do that as a
3 late-filed exhibit.

4 A Certainly.

5 CHAIRMAN CLARK: Mr. Pellegrini, give me a
6 title.

7 MR. PELLEGRINI: Business and residence
8 access lines in the ALLTEL LATAs.

9 CHAIRMAN CLARK: Okay. And that's two
10 LATAs, the Gainesville and Jacksonville LATA.

11 MR. PELLEGRINI: Yes, as I understand.

12 CHAIRMAN CLARK: Okay. You want the
13 business and residential access lines in the
14 Gainesville LATA and in the Jacksonville LATA; is that
15 correct?

16 That will be Late-Filed Exhibit 15.

17 (Exhibit 15 marked for identification.)

18 MR. PELLEGRINI: Okay. We have no further
19 questions for Ms. Eudy. Thank you.

20 WITNESS EUDY: Thank you.

21 MR. WAHLEN: No redirect.

22 CHAIRMAN CLARK: Commissioners. No
23 redirect?

24 MR. WAHLEN: No redirect.

25 CHAIRMAN CLARK: Thank you. You may be

1 excused, Ms. Eudy.

2 **WITNESS EUDY:** Thank you.

3 (Witness Eudy excused.)

4 - - - - -

5 **CHAIRMAN CLARK:** Mr. Burleson.

6 **MR. HERRON:** Chairman Clark, during the
7 break the parties were agreeable to a stipulation to
8 have Mr. Burleson's testimony admitted into the
9 record.

10 **CHAIRMAN CLARK:** Okay. The prefiled direct
11 testimony of Mr. Burleson, consisting of five pages,
12 will be inserted in the record as though read by
13 stipulation of the parties.

14 Ms. Khazraee.

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1 Q. Please state your name and business address.

2 A. My name is Ron Burlison. My business address is 1100 Peachtree Street,
3 N.E., Suite 14E06, Atlanta, Georgia 30309-4599.

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

5 A. I am employed by BellSouth Cellular Corp., the holding company of BellSouth
6 Mobility Inc in Florida. I have held the position of Manager, External Affairs
7 since 1994.

8 Q. What are your current job responsibilities?

9 A. I am responsible for the management of BellSouth Cellular Corp.'s state
10 regulatory and legislative activities, including development of regulatory policy
11 positions and the negotiation of interconnection agreements with local exchange
12 companies, and related matters throughout a number of states where BellSouth
13 Cellular Corp. operates cellular systems. As part of my responsibilities, I have
14 testified before state commissions concerning matters of concern and interest to
15 providers of commercial mobile radio services, including cellular.

16 Q. Does BellSouth Mobility have an interest in these proceedings?

17 A. Yes. BellSouth Mobility provides cellular service in North Florida in the 904
18 Number Plan Area (NPA). Therefore, BellSouth Mobility and its customers
19 will be impacted by the NPA Relief Plan ultimately chosen and implemented for
20 the 904 NPA in North Florida.

21 Q. What is the purpose of your testimony?

22 A. My testimony will identify the impact on the cellular industry of the relief plans
23 currently under consideration for the 904 area. BellSouth Telecommunications,
24 Inc., as the code administrator for the 904 area, has informed the code holders,
25 including all wireless carriers, that the 904 NPA will run out of NXXs in May

1 of 1998. Therefore, some action must be taken to ensure that telephone
2 numbers are made available to customers of telecommunications service
3 providers in that area.

4 Q. How has NXX exhaustion been handled in the past?

5 A. Historically, when additional numbers were needed, they were obtained
6 through a geographic split. That is to say, the geographic area served by the
7 area code or NPA that was nearing exhaustion was divided along some natural
8 geographic boundary between communities of interest, and a new NPA was
9 assigned to one of these areas.

10 Q. What is the role of current code holders in fashioning a relief plan?

11 A. The North American Numbering Plan's Central Office Code Assignment
12 Guidelines require the Administrator to allow code holders to participate in
13 development of a plan to relieve NPA exhaustion. Code holders are providers
14 of telecommunications services who request code assignments from carriers in
15 order to provide telephone numbers to their customers. This includes paging
16 and cellular providers, but does not include pay phone providers or
17 interexchange carriers.

18 Q. Is a geographic split the relief plan proposed for the 904 area?

19 A. Yes. Industry meetings were conducted on July 31, 1996 and August 22,
20 1996, at which a consensus was reached endorsing the use of the NPA
21 geographic split along LATA boundaries as the method for 904 NPA relief.
22 The industry group rejected use of approaches involving boundary realignment
23 of adjacent NPAs and an NPA overlay. However, no consensus was reached
24 as to which LATA(s) would be removed from the 904 NPA and introduced into
25 the new 850 NPA.

1 Q. What are the currently available options for a geographic split for the 904 NPA?

2 A. The industry group has considered the following principal boundary relief
3 options:

4 OPTION 1 - Assign New NPA to Pensacola, Panama City, and Tallahassee

5 This option meets the criteria set forth in the industry guidelines for NPA relief
6 and provides relief for the longest amount of time for both the new and old
7 NPAs. The 904 NPA would then be expected to need relief again in
8 September, 2002. The new NPA, 850, would not exhaust until approximately
9 November, 2006. It should be noted that the State Department of Management
10 Services opposes this option due to the costs it would incur to reprint
11 publications and reprogram premise equipment.

12

13 OPTION 1A - Assign New NPA to Jacksonville and Daytona LATAs

14 This option is inconsistent with the intent of the industry guidelines to minimize
15 the impact of an NPA split by assigning the new NPA to the areas with the
16 greatest number of subscribers and NXXs. The Jacksonville and Daytona
17 LATAs have a significantly greater population than do the Pensacola, Panama
18 City and Tallahassee LATAs. The assignment of the new NPA to Jacksonville
19 and Daytona as proposed in Option 1A would, therefore, affect a far greater
20 number of customers than would either options 1 or 2. The impact on future
21 NPA exhaust dates, however, would be the same as Option 1.

22

23 OPTION 2 - Assign New NPA to Pensacola and Panama City LATAs

24 While this method has the advantage of impacting fewer subscribers and NXXs
25 than Options 1 and 1A, it provides a shorter relief interval than either of those

1 two options. The 904 NPA would be expected to exhaust under this option in
2 October, 2000.

3 Q. What unique problems are presented to cellular providers like BellSouth
4 Mobility in connection with geographic splits such as those represented by the
5 industry group in this case?

6 A. Unlike land line telephone numbers, which may be changed from the telephone
7 company central office, cellular telephone numbers can only be changed by
8 reprogramming the cellular set. Each customer affected by a geographic NPA
9 split must bring the cellular set to a service center in order to have it
10 reprogrammed. BellSouth Mobility estimates that the cost to it of
11 reprogramming each cellular set is approximately \$15. Not only does this cause
12 major expense to the cellular carrier, but more importantly, it causes expense
13 and inconvenience to the cellular customer. Experience has shown that even if
14 the cellular carriers offer a monetary incentive to have customers come into a
15 service center, a significant number of these customers will simply not do so.
16 The inevitable result of this difficulty is the loss of cellular customers.

17 Q. In light of these concerns, which of the geographic split options put forth by the
18 industry is supported by BellSouth Mobility?

19 A. Inevitably, any NPA adjustment will result in costs on various consumers in
20 business, industry and government, which costs must be absorbed by those
21 various consumers. As stated above, any geographic split has undesirable
22 consequences for the cellular industry. However, in light of the
23 telecommunication industry consensus in favor of a geographic split, BellSouth
24 Mobility's view is that Option 1 is the least objectionable approach, with Option
25 2 also being acceptable. Option 1A is the least desirable and of the greatest

1 concern to the cellular industry. Option 1 provides the most favorable long term
2 solution and eliminates the need to disrupt the customer base again in two years.
3 While Option 2 will require further action in two years, it has the smallest
4 immediate impact on the cellular customer base.

5 Q. Does this conclude your testimony?

6 A. Yes, it does.

1 **MR. WAHLEN:** I don't know where she is. She
2 was here this morning, and she may have expected that
3 Mr. Burleson was testifying. I just don't know what
4 to do except -- (Laughter)

5 **COMMISSIONER DEASON:** Maybe you can get a
6 stipulation like Ms. Erwin did.

7 **MR. WAHLEN:** Well, I was going to suggest
8 that. I just talked to Mr. Pellegrini. I know he has
9 a couple of questions, and I offered to answer those
10 as a late-filed exhibit, if that would be acceptable.

11 **MR. PELLEGRINI:** Under the circumstances --

12 **CHAIRMAN CLARK:** Mr. Erwin, do you have any
13 questions?

14 **MR. ERWIN:** No, I didn't have any questions.

15 **CHAIRMAN CLARK:** Ms. White.

16 **MS. WHITE:** No.

17 **CHAIRMAN CLARK:** Mr. Mathues.

18 **MR. MATHUES:** No.

19 **CHAIRMAN CLARK:** And you just had a couple
20 of questions?

21 **MR. PELLEGRINI:** Yes.

22 **CHAIRMAN CLARK:** And you would file a
23 late-filed exhibit answering those questions?

24 **MR. PELLEGRINI:** Yes, ma'am, in very short
25 order. (Laughter)

1 **CHAIRMAN CLARK:** All right. Let's identify
2 that. We should move the testimony into the record
3 then?

4 **MR. WAHLEN:** Yes. We would move Sandy
5 Khazraee's prepared direct testimony consisting of
6 9 pages into the record.

7 **CHAIRMAN CLARK:** That testimony will be
8 inserted in the record as though read. And late-filed
9 exhibit for Ms. Khazraee --

10 **MR. WAHLEN:** Yes. The number?

11 **CHAIRMAN CLARK:** -- will be answers to
12 Staff's questions.

13 (Late-Filed Exhibit 16 identified.)

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1 **BEFORE THE PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **SANDRA A. KHASRAEE**

5 **Q. Please state your name and business address.**

6
7 **A. My name is Sandra A. Khazraee. My business address is**
8 **Sprint/United Telephone of Florida, 555 Lake Border Drive,**
9 **Apopka, Florida 32753.**

10
11 **Q. Please describe your educational background work**
12 **experiences.**

13
14 **A. I received a Bachelor of Science Degree in Mathematics from**
15 **McNeese State University, Lake Charles, LA. Over the past**
16 **19 years, I have attended numerous industry schools and**
17 **seminars covering a variety of technical, economic and**
18 **regulatory issues.**

19
20 **I was an Outside Plant Engineer with South Central Bell**
21 **from May 1977 to August 1981. In 1981, I transferred to**
22 **Pacific Bell where I worked as an Outside Plant Engineer,**
23 **Planning Engineer and Wire Center Planner (Long Range**
24 **Switch Planner).**

25

1 In July 1986, I began working as a Long Range Network
2 Planner at United Telephone Company of Florida. Since
3 then, I have been Technology Planner, Supervising Engineer
4 of Long Range Planning, Product Evaluation and Pricing
5 Manager, Costing Manager and Regulatory Manager.
6

7 Q. What is the purpose of your testimony in this proceeding?
8

9 A. I am testifying on behalf of United Telephone Company of
10 Florida ("Sprint/United") and Central Telephone Company of
11 Florida ("Sprint/Centel") or the "Companies". The purpose
12 of my testimony is to provide and support the Companies
13 position on the 904 NPA split. In my testimony, NPA refers
14 to Numbering Plan Area or what is commonly referred to as
15 an area code. NXX refers to the first three digits of a
16 local telephone number, e.g., the NXX for number 821-4000
17 is 821.
18

19 Q. What methods are available for NPA relief?
20

21 A. NPA code expansion, or relief planning, can be effected by
22 implementing an NPA split, an NPA realignment, or an NPA
23 overlay. The NPA split, which has been the alternative
24 chosen for most NPA relief situations to date, divides the
25 exhausting NPA into two geographic areas. The boundary of

1 an NPA split typically follows demographic, jurisdictional,
2 natural or physical boundaries such as cities, rivers or
3 highways. The boundaries are chosen to minimize disruption
4 of existing calling patterns as much as possible. The
5 existing NPA code is assigned to the geographic area with
6 the greatest number of working lines in order to minimize
7 the number of customers impacted by the NPA change.

8
9 An NPA realignment is considered when the NPA requiring
10 relief is adjacent to an NPA, within the same state or
11 geographic area, which has spare NXX code capacity. A
12 boundary shift occurs so that spare codes in the adjacent
13 NPA can be used in the NPA requiring relief. As a result,
14 the geographic area of the exhausting NPA shrinks, the
15 geographic area of the NPA with spare capacity expands.

16
17 In an NPA overlay, code relief is provided by opening up a
18 new NPA within the same geographic area. Numbers for the
19 new NPA are assigned to new growth on a carrier neutral
20 basis; first come first served. Although mandatory
21 customer number changes are eliminated, ten digit dialing
22 is required for local calling.

23
24 The NPA overlay has been implemented to date only in New
25 York City, where it was limited to wireless providers' use.

1 Ameritech, in the Chicago area, attempted to institute an
2 overlay, but due to their requirement for wireless
3 providers to relinquish existing numbers, the FCC found the
4 Ameritech plan "would unreasonably discriminate against
5 wireless carriers" and overruled it. In follow up to this
6 ruling, the FCC provided further clarification on the use
7 of NPA overlays in the Second Report and Order on
8 Interconnection (CC Docket No. 96-333) adopted August 8,
9 1996. Overall, the FCC declared technology specific (i.e.,
10 wireless only) overlays are not allowed, as in the
11 Ameritech case. The FCC further directed that a state
12 commission may choose implementation of an NPA overlay
13 subject to two conditions: 1) mandatory ten digit local
14 dialing by all customers between and within area codes in
15 the area covered by the new code; and 2) availability to
16 every existing telecommunication carrier, including CMRS
17 providers, authorized to provide telephone exchange service
18 in the affected area code 90 days before the introduction
19 of a new overlay code, of at least one NXX in the existing
20 area code.

21
22 Q. Which of these methods does Sprint endorse?

23
24 A. Sprint supports the NPA split and the NPA overlay when the
25 FCC conditions are met. Sprint's first choice is the NPA

1 split. The NPA split does not require ten digit dialing
2 for all calls as the NPA overlay does. Additionally,
3 technical aspects associated with an NPA split have been
4 addressed in previous NPA relief implementations within the
5 state and established implementation procedures are
6 generally understood. Customers are more educated about
7 the NPA split process and would likely experience less
8 confusion than with the NPA overlay.
9

10 Q. Which of the plans discussed in the 904 NPA split industry
11 meetings should be considered by the Commission?
12

13 A. There were three plans which were determined to be the most
14 viable of all the plans considered in the industry
15 meetings.
16

17 Plan 1 proposes the assignment of the 850 NPA to the
18 Pensacola, Panama City and Tallahassee LATAs. The 904 NPA
19 would remain assigned to the Jacksonville and Daytona Beach
20 LATAs. Based on the NXX forecasts filed by the code
21 holders with BellSouth, this plan would extend the life of
22 the 904 NPA through approximately September of 2002 and
23 would not exhaust the 850 NPA until approximately November
24 of 2006. Plan 1 most closely follows Bellcore's guidelines
25 for NPA relief that is the existing NPA code is left with

1 the geographic area that has the largest number of working
2 telephone numbers. Additionally, Plan 1 is estimated to
3 provide relief for a reasonable number of years for both
4 the 904 and 850 NPAs.

5
6 Plan 1a assigns the 850 NPA to the Jacksonville and Daytona
7 Beach LATAs and leaves the 904 NPA assigned to the
8 Pensacola, Panama City and Tallahassee LATAs. The
9 projected exhaust of the 850 NPA in this plan is September
10 2002 while the projected exhaust of the 904 NPA is November
11 2006. Plan 1a provides relief for the same number of years
12 as Plan 1. The major disadvantage of this plan over Plan
13 1 is that the Jacksonville and Daytona Beach LATAs will
14 require NPA relief four years after they were changed from
15 the 904 to the 850 NPA. Therefore, many of the customers
16 in those two LATAs will be subject to two number changes in
17 a four year period.

18
19 In Plan 2, the 850 NPA would be assigned to the Pensacola
20 and Panama City LATAs. The 904 NPA would be assigned to
21 the Tallahassee, Jacksonville and Daytona Beach LATAs. In
22 this plan, the 850 NPA would exhaust in May 2012 and the
23 904 NPA would exhaust in October 2000. This plan would
24 eliminate the short term need for the Tallahassee area to
25 change the NPA but this would only result in deferring the

1 needed relief in the 904 NPA for two years.

2

3 Q. Which of these plans could Sprint support?

4

5 A. Sprint could support all three of these plans although Plan
6 1 is preferable. As stated earlier, Bellcore's NPA relief
7 guidelines specify that the geographic area with the
8 greatest density of telephone numbers in use should
9 maintain the existing NPA code; Plan 1a does not meet that
10 criteria. Also, the customers within the new 850 NPA
11 (Jacksonville and Daytona Beach) would require a second NPA
12 split within four years in Plan 1a.

13

14 Plan 2 has the advantage of changing the fewest number of
15 customers' telephone numbers but it also provides the
16 shortest amount of relief. Within two years, the 904 NPA
17 would again require a relief plan. In Plan 1, the 904 NPA
18 would not require relief again until September 2002.
19 Therefore, Plan 1 is the most viable of the three plans.

20

21 Q. Does Sprint believe that the implementation of local number
22 portability will eliminate the 904 NPA exhaust problem
23 within the next four to five years?

24

25 A. No, Sprint does not believe that the implementation of

1 permanent local number portability (LNP) will eliminate the
2 need to implement new NPAs.

3

4 Q. What effect will interim number portability have on the NPA
5 exhaust?

6

7 A. Interim Number portability will increase the problem of NXX
8 and NPA exhausts. If a customer changes their service to
9 another telecommunications company but elects to keep their
10 existing telephone number, a second telephone number is
11 assigned to that customer. A significant number of these
12 customers could hasten the exhaust of the NPAs. Sprint
13 does not know if the code holders who provided input to the
14 forecast of NPA exhaust accounted for this demand.

15

16 Q. What should be done to minimize the negative impact of the
17 904 NPA split to all customers.

18

19 A. All involved telecommunications companies and the
20 Commission need to work together to mitigate the negative
21 impact to all customers affected by this NPA split. The
22 involved parties should refer to the plan followed in the
23 305/954 NPA split which occurred in Dade and Broward
24 counties. Minimal customer complaints were received during
25 that transition from one NPA to another because of the

1 proactive steps taken by the Commission and BellSouth.

2

3 Finally, the LECs should work with the State of Florida to
4 ensure a smooth transition to the new NPA. With seven
5 dedicated NXX codes and approximately 40K centrex lines
6 working in the Tallahassee area, the State has a
7 significant stake in this NPA split. Each LEC should work
8 with the State to assure that the "Blue" government pages
9 are updated in all directories. The LECs should also work
10 with the State to help identify issues early in the
11 planning process and assure all details are addressed.

12

13 Q. Does that conclude your direct testimony?

14

15 A. Yes.

1 **MR. WAHLEN:** Sure.

2 **CHAIRMAN CLARK:** Mr. Pellegrini, do you have
3 a copy of those questions?

4 **MR. PELLEGRINI:** Yes, I do.

5 **CHAIRMAN CLARK:** How many are there?

6 **MR. PELLEGRINI:** Three.

7 **CHAIRMAN CLARK:** Okay. If you would provide
8 Mr. Wahlen with those questions.

9 **MR. WAHLEN:** Yes.

10 **MR. PELLEGRINI:** Thank you.

11 **MR. ERWIN:** Excuse me. Did those questions
12 relate to the --

13 **CHAIRMAN CLARK:** Mr. Pellegrini, would you
14 go ahead and read those questions?

15 **MR. PELLEGRINI:** I'm sorry?

16 **CHAIRMAN CLARK:** Would you go ahead and read
17 those questions to assure ourselves that they don't
18 cause concern with other parties?

19 **MR. PELLEGRINI:** Certainly. The first
20 question is this. BellSouth proposes to implement the
21 new area code along LATA boundaries. Do you believe
22 it is important and necessary to follow the LATA
23 boundaries when implementing a new area code? And if
24 so, why?

25 The second question: In DMS's Witness

1 Mayne's direct testimony, he indicates that state will
2 be charging him \$160,000 for modification of 176
3 consolidated services such as CENTREX, ESSX, etcetera.
4 Do you know if Centel will actually be charging the
5 state for those modifications?

6 And the third question would refer the
7 witness to Exhibit 2, asking again for a breakdown of
8 business and residence access lines in the Sprint
9 LATAs which, I believe, there's only one in
10 Tallahassee?

11 MR. WAHLEN: That's correct.

12 CHAIRMAN CLARK: Okay.

13 MR. WAHLEN: And I know that she knows the
14 answers to those questions, so we should not have any
15 problem answering them.

16 CHAIRMAN CLARK: Okay.

17 MR. ERWIN: Excuse me. The reason I was
18 asking was that I know since my witness was not here,
19 they didn't get an opportunity to ask him those
20 questions. But I note from looking at the LATA map
21 that Florida, for example, has exchanges in two
22 different LATAs --

23 CHAIRMAN CLARK: Okay. Just a minute.

24 Mr. Wahlen is your witness here?

25 MR. WAHLEN: Yes, she is.

1 **CHAIRMAN CLARK:** Why don't we go ahead and
2 put her on the stand and eliminate this late-filed
3 exhibit and any problems with late-filed questions.

4 **WITNESS KHASRAAE:** I apologize.

5 **CHAIRMAN CLARK:** It's quite all right. We
6 have already inserted your testimony in the record as
7 though read.

8 **WITNESS KHASRAAE:** Thank you.

9

- - - - -

10

SANDRA A. KHASRAAE

11 was called as a witness on behalf of United Telephone
12 Company and Centel Telephone Company of Florida and,
13 having been duly sworn, testified as follows:

14 **CHAIRMAN CLARK:** Now, Mr. Wahlen do you
15 desire of her that she do a summary?

16 **MR. WAHLEN:** No. I would like to make sure
17 she is sworn, and then she can --

18 **CHAIRMAN CLARK:** I believe she was.

19 **WITNESS KHASRAAE:** I am sworn.

20 **MR. WAHLEN:** Okay. Then, as far as I'm
21 concerned, if Mr. Pellegrini would like to inquire,
22 that will be fine.

23 **CHAIRMAN CLARK:** Mr. Pellegrini was the only
24 person who has questions for you.

25 **WITNESS KHASRAAE:** Okay.

CROSS EXAMINATION

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BY MR. PELLEGRINI:

Q I have just a few questions, Ms. Khazraee. The first is this. BellSouth has proposed to implement the new area code along LATA boundaries. Do you understand that?

A Yes.

Q Do you believe it is important and necessary to follow the LATA boundaries when implementing a new area code?

A I believe if it's possible, it's good to do that. Because those LATA boundaries are there, we've kept communities of interest with the same type of calling scopes for the most part within those boundaries. But I don't think there's any technological reason that we have to follow a LATA boundary.

Q In DMS's witness Mayne's direct testimony, he indicated it will cost the state \$160,000 for modifications of 176 consolidated services such as CENTREX and ESSX etcetera. Do you know if Centel will actually charge the state for those modifications?

A If the modifications are those that need to be done within our switch, which for a CENTREX system is the case, we would not charge for what is done in

1 our switch. If it's something that needs to be done
2 to their CPE equipment, their customer premise
3 equipment -- in other words, if they have a call
4 accounting box somewhere in their location that is
5 associated with their CENTREX system which helps them
6 keep account of the calls, then in all likelihood they
7 would be responsible for reprogramming that type of
8 equipment.

9 Q In the last question I'd like to refer to
10 you Exhibit No. 2. Mr. Wahlen is bringing you a copy
11 of that at the moment. (Witness tendered document.)

12 This is an excerpt from the Florida
13 Telecommunications Industry Association 1996/1997
14 Membership Directory. I call your attention to the
15 entry for Sprint. And I would ask you if you can tell
16 us the number of business access lines and residence
17 access lines in the Sprint LATAs, in the LATAs which
18 Sprint is serving?

19 A Within the 904 area?

20 Q Yes.

21 A Yes, I can. Not from this paper, but I have
22 my own.

23 Q Sure.

24 A Okay. Do you want me to go ahead and give
25 them to you now verbally?

1 Q Please, yes.

2 A Within the Pensacola LATA -- and you said
3 you want both res and biz?

4 Q Yes.

5 A The residence is 89,985. Business is
6 35,278. In the Tallahassee LATA, res is 119,202;
7 business is 99,090, so that's 99,090. In the Panama
8 City LATA, we have 19,750 res; 6,638 business. In the
9 Jacksonville LATA, 5,917 res; 2,328 biz. And we also
10 have a small portion in the Orlando LATA which is in
11 the 904 area code. That's 21,370 residence, 4,490
12 biz.

13 Q Could you give me the residence number again
14 in Pensacola?

15 A Yes, 89,985.

16 MR. PELLEGRINI: We have no further
17 questions, thank you.

18 CHAIRMAN CLARK: Commissioners. Redirect.

19 MR. WAHLEN: No redirect.

20 COMMISSIONER KIESLING: I just wanted to be
21 sure I got the numbers right. What was the
22 residential total of access lines for the Tallahassee,
23 Jacksonville and then the other?

24 WITNESS KHARRAE: Okay. Residential,
25 Tallahassee was 119,202. Jacksonville 5,917. Panama

1 City 19,750. And the Orlando LATA was 21,307.

2 COMMISSIONER KIESLING: Thank you.

3 CHAIRMAN CLARK: Mr. Wahlen, redirect?

4 MR. WAHLEN: No redirect.

5 CHAIRMAN CLARK: Thank you very much.

6 WITNESS KHASRAES: My apologies again for
7 keeping you waiting.

8 CHAIRMAN CLARK: Don't worry about. That
9 concludes our hearing, I believe. That concludes the
10 hearing.

11 MR. PELLEGRINI: That concludes the
12 witnesses.

13 CHAIRMAN CLARK: Okay. We need to make a
14 decision. And just so the record is clear, there will
15 be no Late-Filed Exhibit 16. But we do have five
16 late-filed exhibits. That's Late-Filed Exhibit 9, 10,
17 11, 12 and 15. And I'd like to get information from
18 Staff as to when we need to have those exhibits filed?

19 (Late-Filed Exhibit 16 withdrawn.)

20 MR. PELLEGRINI: Chairman Clark, Staff would
21 request that the late-filed exhibit be submitted by
22 12/16, a week from today.

23 CHAIRMAN CLARK: Ms. White.

24 MS. WHITE: Yes, that's fine.

25 CHAIRMAN CLARK: And Ms. Eudy.

1 **WITNESS EUDY:** That's fine.

2 **MR. WAHLEN:** That's fine.

3 **MR. PELLEGRINI:** I also would remind the
4 parties that briefs are scheduled for submission on
5 12/31.

6 **CHAIRMAN CLARK:** Anything further we need to
7 take up at this time? If not, thank you very much.
8 This hearing is adjourned.

9 Back on the record.

10 **MR. PELLEGRINI:** I'm sorry, but we think we
11 may have a problem with the date on which briefs are
12 due.

13 **CHAIRMAN CLARK:** What is the date?

14 **MR. PELLEGRINI:** It's 12/31, and the
15 recommendation is due on the 9th.

16 **CHAIRMAN CLARK:** And what is the problem?

17 **MR. WAHLEN:** It's the Sugar Bowl.

18 **CHAIRMAN CLARK:** Well, let's put it this
19 way. Are you a Gator fan? That may influence whether
20 I want to change it or not.

21 **MR. PELLEGRINI:** Would the parties agree to
22 an earlier date? One week earlier perhaps?

23 **MR. ERWIN:** Let's see. Christmas Eve?

24 **MS. WHITE:** No.

25 **CHAIRMAN CLARK:** Bah humbug.

1 **MR. WANLEN:** When are the transcripts
2 expected?

3 **MR. PELLEGRINI:** Transcripts are due 12/13.

4 **MS. WHITE:** How about the 23rd?

5 **MR. PELLEGRINI:** That is a reasonable
6 compromise, I guess.

7 **CHAIRMAN CLARK:** Let me ask the parties. Is
8 that reasonable for the 23rd?

9 **MS. WHITE:** If we can get the transcripts by
10 the 13th, then, yeah.

11 **CHAIRMAN CLARK:** Okay.

12 **MS. RULE:** When are the late-fileds due?

13 **MR. PELLEGRINI:** A week from today.

14 **CHAIRMAN CLARK:** And as I recall, that's
15 information as to distribution on the business and
16 residential by LATA. One's an analysis of having the
17 line in Jacksonville the way Commissioner Kiesling --
18 so I'm not sure it has that much of a bearing on what
19 the briefs would look like.

20 Mr. Pellegrini, would you go over one more
21 time what the schedule is?

22 **MR. PELLEGRINI:** Yeah. The transcripts are
23 due -- well, first of all, the late-filed exhibits
24 would be due a week from today which would be the
25 16th.

1 STATE OF FLORIDA)
2 COUNTY OF LEON)

: CERTIFICATE OF REPORTERS

3 We, ROWENA NASH HACKNEY and H. RUTHE POTAMI
4 Official Commission Reporters,

5 DO HEREBY CERTIFY that the Hearing in Docket
6 No. 961153-TL was heard by the Florida Public Service
7 Commission at the time and place herein stated; it is
8 further

9 CERTIFIED that we stenographically reported
10 the said proceedings; that the same has been
11 transcribed under our direct supervision; and that
12 this transcript, consisting of 184 pages, constitutes
13 a true transcription of our notes of said proceedings
14 and the insertion of the prescribed prefiled
15 testimony of the witness.

16 DATED this
17 13th day of December, 1996.

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