

YOUNG, VAN ASSENDERP & VARNADOE, P. A.  
ATTORNEYS AT LAW

REPLY TO

ORIGINAL  
FILE COPY

R. BRUCE ANDERSON  
TASHA O. BUFORD  
DAVID L. COOK\*  
DAVID B. ERWIN  
C. LAURENCE KEESEY  
ANDREW J. SOLIS  
KENZA VAN ASSENDERP  
GEORGE L. VARNADOE  
ROY C. YOUNG

December 20, 1996

GALLIE'S MALL  
225 SOUTH ADAMS STREET, SUITE 200  
POST OFFICE BOX 1833  
TALLAHASSEE, FLORIDA 32302-1833  
TELEPHONE (904) 222-7206  
TELECOPIER (904) 561-6834

SUNTRUST BUILDING  
801 LAUREL OAK DRIVE, SUITE 300  
POST OFFICE BOX 7907  
NAPLES, FLORIDA 34101-7907  
TELEPHONE (941) 597-2814  
TELECOPIER (941) 597-1060

\*BOARD CERTIFIED REAL ESTATE LAWYER

WILLIAM J. ROBERTS  
OF COUNSEL

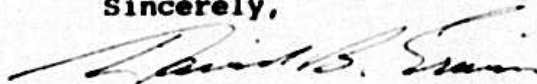
**Ms. Blanco Bayo  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850**

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

**Dear Ms. Bayo:**

Enclosed is the original and 15 copies of a Post Hearing Statement in the above captioned docket on behalf of Quincy Telephone Company, St. Joseph Telecommunications, Gulf Telecommunications and Florida Telecommunications. Copies have been sent to parties of record.

Sincerely,



David B. Erwin

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 3 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

**DBE:akh  
Enclosures  
cc: Tom McCabe  
John Vaughan  
Parties of Record**

DOCUMENT NUMBER-DATE

13592 DEC 20 96

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for numbering )  
plan area relief for 904 )  
area code, by BellSouth )  
Telecommunications, Inc. )

Docket No. 961153-TL

Filed: December 20, 1996

ORIGINAL  
FILE COPY

**POST HEARING STATEMENT**

There is little need to belabor the facts. They are simple. Some portions of the territory covered by the 904 area code must receive a number change right away. The current exhaust date for the 904 NPA is May, 1998. (TR4) No party in this docket wants to be directly affected by an area code number change, and none of the options presented for consideration precisely satisfy the guidelines of the Industry Carriers Compatibility Forum (ICCF). Faced with this dilemma, what is the most reasonable solution for the Commission?

Quincy Telephone Company and the St. Joseph Telecommunications companies submit that the most significant and widespread benefits for the entire state of Florida could be achieved through the so-called "Three Way Split" plan. This plan would leave the 904 area code in the Tallahassee Market Area and the panhandle LATAs (Panama City and Pensacola), provide a new area code for the Jacksonville LATA and another new area code for the Daytona Beach LATA. This "Three Way Split" would not fully comply with the ICCF Guidelines (Exhibit 2), but then neither would any of the other plans being considered.

**The ICCF Guidelines:**

The purpose of the ICCF Guidelines is to help NPA Relief

DOCUMENT NUMBER-DATE

13592 DEC 20 1996

REGISTRATION REPORTING

Coordinators. The Guidelines apply only to geographic NPA relief planning. They were developed to facilitate and standardize the NPA relief planning process without favoring any particular interest group.

The guidelines would have new area codes exhaust in 8-10-years. They would not support a differential between exhaust dates of more than 15 years. They would be against an exhaust date of less than 5 years. Like an inartful plagiarism of "Goldilocks and the Three Bears," the guidelines call for an exhaust period that is not too long and not too short, but just right. Like any fairy tale, however, it probably can not come to pass.

BellSouth's witness, Daniel Baeza, favors the so called Option 1, which assigns a new area code to Tallahassee and the panhandle LATAs, while leaving the Jacksonville and Daytona Beach LATAs in the 904 area code. (TR7) Option 1 meets the guideline criteria insofar as the exhaust date for Tallahassee is concerned (2006). If the whole picture is considered, however, Option 1 fails the guideline test just like all the other options. If the Jacksonville and Daytona Beach LATAs remain in the 904 area code, it will exhaust very soon (2002), and there will have to be action taken at that time. If the Jacksonville and Daytona Beach LATAs are then split along LATA boundaries, the Daytona Beach LATA will have an exhaust date that is too far in the future (2030), and the Jacksonville LATA will need to be readdressed in under 5 years (2006). In addition, there would be a differential



that would exceed 15 years. Option 1 merely postpones unavoidable deviation from the Guidelines.

Indeed, regardless of whether there is a "Three Way Split" or Option 1 is adopted, there will of necessity be two new area codes in the 904 area code within the very near future, and no matter which plan is recommended, there will be an unavoidable deviation from the ICCF Guidelines. (TR 185-187) Under the circumstances, perhaps it would make sense not to worry too much about the ICCF Guidelines. The Commission should probably just place the decision making emphasis on the benefits and detriments to all those who will be affected by the Commission's action in this docket.

#### Benefits and Detriments

Everyone probably agrees that there is a financial cost inherent in changing area codes, regardless of where the changes take place. Switches and PBX's must be modified and cellular sets must be reprogrammed. (TR 213) One can simply emphasize one part of the ICCF Guidelines and argue that Jacksonville should not suffer an area code change because it is enjoying the most rapid growth of any place in the 904 area code, but there are other ways to view that situation. For example, if it costs \$15 to reprogram a cellular set (TR 213) and the number of cellular customers is growing rapidly in Jacksonville, why wait until there are many more phones to reprogram at \$15 each before making the change? Also, why shouldn't the area that is creating the most need for a change bear the greater costs for the burden that

has been created by rapid growth? Finally, why wouldn't it be better to look at costs other than those that are strictly monetary?

Probably, the most significant costs and burdens that are not strictly monetary were discussed by witness Glenn W. Mayne. These are the costs of confusion, frustration and inconvenience that would be visited upon the entire population of Florida, if the area code is changed for the state capital, since state government has a significant "community of interest" with all of the rest of the millions of people in the state. (TR 137-145)

There is also a strong community of interest between Tallahassee and the Panama City LATA. Both Quincy Telephone Company and St. Joseph Telecommunications have EAS routes between the two areas. One of the prime reasons for establishing EAS is to obtain seven digit dialing, and this capability would probably be lost if the Commission chooses any plan that assigns different area codes to Tallahassee and the Panama City LATA.

### Conclusion

When all the competing interests are considered, perhaps the needs of state government and those served by it should be paramount, and the "Three Way Split" should be recommended.

The ICCF Guidelines can not be followed completely, regardless of which geographic split is chosen, but, at least, if the Jacksonville LATA has its own area code and Tallahassee and the rest of the panhandle keep the 904 area code, both regions will be set until 2006, and the community of interest between



Tallahassee and the rest of the state will be promoted and facilitated.

Respectfully submitted,



David B. Erwin  
Young, van Assenderp & Varnadoe, P.A.  
225 S. Adams St., Suite 200  
Tallahassee, Florida 32301  
(904) 222-7206

Attorneys for  
Quincy Telephone Company  
P. O. Box 189  
Quincy, FL 32351

St. Joseph Telecommunications  
Gulf Telecommunications  
Floralta Telecommunications  
502 Fifth Street  
Port St. Joe, FL 32456

**CERTIFICATE OF SERVICE  
DOCKET NO. 961153-TL**

I HEREBY CERTIFY that a copy of the foregoing has been sent by U. S. Mail or hand-delivery this 20th day of December, 1996, to the following parties of record:

William P. Cox  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Charles Pelligrini  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Nancy H. Sims  
BellSouth Telecommunications  
150 S. Monroe St., Ste. 400  
Tallahassee, FL 32301-1556

Steve Mathues  
Florida Department of  
Management Services  
4050 Esplanade Way  
Tallahassee, FL 32399-0950

Robert Beatty  
BellSouth Telecommunications  
675 West Peachtree St.  
Atlanta, Georgia 30375

Jeff Wahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32301

**Mark Herron**  
**Akerman, Senterfitt & Edison**  
**Suite 200**  
**216 South Monroe St.**  
**Tallahassee, FL 32302-2555**

**Lynn Brewer**  
**Northeast Florida**  
**Telephone Company**  
**P. O. Box 485**  
**Macclenny, FL 32063-0486**

**Tom McCabe**  
**Quincy Telephone Company**  
**P. O. Box 189**  
**Quincy, FL 32351**

**John H. Vaughan**  
**St. Joseph Telecommunications**  
**502 Fifth St.**  
**Port St. Joe, FL 32456**

**Harriet Eudy**  
**ALLTEL Florida, Inc.**  
**P. O. Box 550**  
**Live Oak, FL 32060**

  
**David B. Erwin**

z(h\961153.904\posthb