

THE COPY



Marsha E. Rule
Attorney

Suite 700
101 N. Monroe St.
Tallahassee, FL 32301
904 425-6365
FAX: 904 425-6361

December 20, 1996

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Docket No. 961153-TL

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Posthearing Brief in the above referenced docket.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Marsha E. Rule

cc: Parties of Record

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CML** _____
- CTR _____
- EAG _____
- LEG **3** _____
- LIN **5** _____
- OPC _____
- RCH _____
- SEC **1** _____
- WAS _____
- OTH _____

DOCUMENT NUMBER - DATE
13614 DEC 23 96
FPCO-RECORDS, REPORTING

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Numbering Plan) Docket No. 961153-11.
Relief for 904 Area Code, by)
BellSouth Telecommunications, Inc.) Filed: 12/20/96
_____)

**AT&T's POSTHEARING BRIEF
AND STATEMENT OF POSITIONS**

AT&T Communications of the Southern States, Inc., (AT&T) hereby submits its post-hearing brief and statement of positions in the above docket.

AT&T's Statement of Basic Position:

** AT&T supports a geographic split as the appropriate mechanism to provide relief for the 904 area code. Geographic splits should be designed around existing LATA boundaries to the extent possible. Geographic splits along other than existing LATA boundaries create additional financial and technical burdens such as rehoming portions of any exchanges that are divided by the proposed NPA boundary and reprogramming the switching matrices that screen inter- and intralATA calls. In addition, to the extent that a customer has an interLATA carrier that is different from the customer's intralATA carrier, altering the existing configuration of any LATA will require that the customer's toll traffic be shifted between the customer's inter- and intralATA carriers. **

ISSUE 1: What geographic split for 904 area code relief should be ordered by the Commission?

AT&T: ** No position. **

ISSUE 2: How and when should the area code relief be implemented?

AT&T: ** No position. **

DISCUSSION

Meetings held prior to the initiation of this docket, as required by the ICCF NPA guidelines, resulted an industry consensus that the method for area code relief in the 904 NPA should be a geographic split along LATA boundaries, but disagreement as to which LATAs would remain in the 904 code area. The parties were, however, able to agree upon the three most viable options for implementing a geographic split, all of which involve division along LATA boundaries. (Tr. 22, 191) AT&T takes no position on which of these three options the Commission should implement, but believes that any geographic split should follow existing LATA boundaries. Division along other than LATA boundaries creates the following additional burdens not caused by the three options proposed in this docket:

- **Ten-digit dialing:** According to BellSouth's witness, Mr. Baeza, 10-digit dialing would be necessary for intraLATA calls to cross new boundaries that are not drawn along existing LATA lines. (Tr. 44-45, 73; Ex. 9) Seven digit dialing could be retained if some number of NXX codes were protected and made unavailable for use, but this would hasten the exhaust date of the newly-divided area. Neither result is satisfactory, and a decision that results in unusable NXX codes would be generally inconsistent with ICCF NPA guidelines. (Tr. 90)
- **Wire center reprogramming:** Although it appears that it may be technically feasible to support two NPAs from one wire center, Mr. Baeza testified that it would "create some technological challenges" and that it would probably require making some codes unavailable for use. (Tr. 55). These technological challenges have not been

properly examined or quantified to date, but doubtless would be more costly to implement than a geographic split that follows LATA boundaries. A LATA-splitting solution is inconsistent with industry objectives of minimizing technical and operational impacts when implementing NPA relief. (Tr. 192) Additionally, the Commission should not select a form of area code relief that makes NXX codes unavailable for use.

- **Intra-LATA presubscription:** It is not clear whether and to what extent BellSouth could technically support intraLATA presubscription if two area codes share one LATA. (Tr. 56). Even assuming no technical problems (an assumption not supported by the record in this case), altering the existing configuration of any LATA would shift toll traffic between customers' inter- and intraLATA carriers, in effect slamming customers who have different inter- and intraLATA carriers.
- **Communities of interest:** One of the reasons the telecommunications industry prefers NPA splits along LATA boundaries is to maintain existing communities of interest. (Tr. 54, 191) According to Mr. Baeza, "LATA boundaries by their nature have communities of interest associated with it." Therefore, splitting a LATA into two or more NPAs tends to split communities of interest and should be avoided when possible.


In addition to the above technical and financial problems, the Commission must also consider whether it is procedurally appropriate to order NPA relief that requires splitting a LATA into two area codes. This possibility was not identified as an issue and no party filed testimony discussing this alternative. Although there was some cross

examination on the subject, there is no record analysis of the cost or even the feasibility of this type of NPA split. It is impossible to determine whether any benefits of this type of split will outweigh the unknown costs.

CONCLUSION

For the reasons set forth above, AT&T respectfully requests the Commission to avoid splitting a LATA when selecting its plan for area code relief.

Respectfully submitted this 20th day of December, 1996.



Marsha E. Rule
101 N. Monroe St.
Suite 700
Tallahassee, Florida 32301
(904) 425-6365

ATTORNEY FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NO. 961153-TL

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

J. Phillip Carver
Robert G. Beatty
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

J. Jeffrey Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

David B. Erwin
Young, van Assenderp & Varnadoe, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32302-1833

Mark Herron
E. Gary Early
Akerman, Senterfitt & Edison, P.A.
216 South Monroe Street, Suite 200
Tallahassee, FL 32302-2555

Stephen S. Mathues
Sharon D. Larson
State of Florida Department of
Management Services
4050 Esplanade Way
Tallahassee, FL 32399-0950

Charles J. Pellegrini
William P. Cox
Division of Legal Services
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Marsha E. Rule