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**REBUTTAL TESTIMONY OF**

**RONALD W. BURLESON**

**BEFORE THE**

**FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 990223-TL**

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**REBUTTAL TESTIMONY OF**

**RONALD W. BURLESON**

In re: Request for review of  
proposed numbering plan relief  
for the 941 area code

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Docket No. 990223-TL  
Filed March 25, 1999

1 Q Please state your name and business address for the record.

2

3 A. Ronald W. Burleson, BellSouth Cellular Corp., 1100 Peachtree Street, Suite 809, Atlanta,  
4 Georgia 30309.

5

6 Q. On whose behalf are you appearing?

7

8 A. Florida Cellular Service, Inc. d/b/a BellSouth Mobility.

9

10 Q. Have you had occasion to pre-file direct testimony in this docket?

11

12 A. Yes. My direct testimony was prefiled in this docket on March 18, 1999.

13

14 Q. Have there been recent developments in this docket that warrant your additional  
15 testimony?

16

17 A. Yes. In my recent direct testimony I supported what then was the Industry consensus for  
18 941 area code relief. I recommended that the Commission immediately approve the  
19 Florida 941 NPA Area Code Split Plan as proposed by North American Numbering Plan  
20 Administration ("NANPA") in NANPA's letter to the Commission dated August 14,  
21 1998. Alternatively, I testified that BellSouth Mobility would support an all-services  
22 overlay relief plan to address the imminent 941 area code exhaust problem.

23

24 Since preparing my direct testimony, I have learned that NANPA's Code Administrator  
25 has declared an Extraordinary Jeopardy for the 941 NPA. The declaration of

1 Extraordinary Jeopardy recognizes that, under this docket's current procedural schedule,  
2 forecasted demand for NXX resources will exceed known supply prior to implementation  
3 of a relief plan.

4

5 Q. Will the declaration of Extraordinary Jeopardy impact the Industry's consensus on  
6 NANPA's proposed area code split relief plan?

7

8 A. Yes. NANPA has scheduled an Extraordinary Jeopardy Industry Conference Call for  
9 April 6, 1999 to address the emergency. BellSouth Mobility expects that the geographic  
10 split plan will be reevaluated at the Industry's April 6 conference call.

11

12 Q. In light of NANPA's declaration of Extraordinary Jeopardy, what is the most appropriate  
13 method of preventing the exhaust of numbering resources in the 941 NPA?

14

15 A. Rapid implementation of an area code relief plan is more critical now than before.  
16 BellSouth Mobility believes that an all-services overlay plan is the most effective and  
17 advantageous method of achieving expeditious relief for the 941 NPA. Additionally, I  
18 would point out that both GTE and Sprint, which previously had been proponents of a  
19 geographic split plan, now have endorsed an all-services overlay plan.

20

21 Q. What are the particular advantages to an all-services overlay plan?

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23 A. An all-services overlay plan offers several advantages that are uniquely suited to address  
24 the imminent 941 NPA exhaust problem:

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- Rapid Implementation. An overlay can be implemented in a matter of several months and thus provides area code relief much more rapidly than would a geographic split.
- Reduced Code Rationing. The rapid implementation of an overlay will reduce the code rationing required by NANPA to respond to the Extraordinary Jeopardy declaration.
- Minimized Customer Confusion and Frustration. An overlay reduces or eliminates the need for customer number changes.
- Minimize Impact on Carrier and Customer. Cellular handset reprogramming, which would be required under a geographic split method, would not be required under an all-services overlay.

Q. Are there other advantages to an overlay relief plan that are relevant to this proceeding?

A. Yes. An overlay enables current residents to retain their 941 NPA. This would address some of the concerns of the Fort Meade and Englewood residents which have been expressed in related dockets.

Q. Would an overlay relief plan impose significant difficulties on Florida customers?

A. No, an overlay relief plan can be expeditiously implemented with no significant difficulties on customers. There might be a concern about ten-digit dialing, which is necessitated with an all-services overlay plan. Ten-digit dialing, however, is a minor and temporary inconvenience.

1 Q. Why do you characterize ten-digit local dialing as a minor and temporary inconvenience?

2

3 A. The inconvenience associated with ten-digit dialing is minor when compared with the  
4 burdens and confusion associated with a geographic area code split. Even with a ten-digit  
5 dialing, an overlay plan is far less intrusive from a customer's perspective than a  
6 geographic area code split. Unlike an area code split, an overlay plan allows existing  
7 customers to retain their existing numbers. This minimizes customer confusion and,  
8 unlike a geographic split, does not require existing customers to change business cards,  
9 stationery, and signage.

10

11 The inconvenience associated with ten-digit dialing is temporary because customers  
12 quickly and easily adapt to the dialing pattern. Indeed, this has been the case in the other  
13 jurisdictions such as in Atlanta. Again, when one considers the frustration, confusion,  
14 and burden imposed by a geographic area code split, the overlay relief plan is the much-  
15 preferred alternative. This is particularly true in the 941 NPA where customers have  
16 recently undergone an area code split and would be required to repeat that difficult effort  
17 again if a geographic split were now to be adopted.

18

19 Q. Does this conclude your rebuttal testimony.

20

21 A. Yes.

22

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