

**ORIGINAL**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Establishment of a )  
Statewide Emergency Area )  
Code Relief Plan )  
\_\_\_\_\_ )

Docket No. 990373-TP  
Filed: June 9, 1999

**DIRECT TESTIMONY OF SUZANNE BROOKS  
ON BEHALF OF MCI WORLDCOM, INC. AND  
ITS OPERATING SUBSIDIARIES**

DOCUMENT NUMBER-DATE

~~07105~~ JUN-99

FPSC-RECORDS/REPORTING

1       **Q:     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2       A:     My name is Suzanne Brooks. My business address is 2250 Lakeside  
3             Boulevard, Richardson, Texas, 75082.

4       **Q:     PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

5       A:             I am currently employed by MCI WorldCom, Inc. (MCI  
6             WorldCom) in its Local Numbering Group. I am responsible for  
7             representing MCI WorldCom with respect to NPA Relief and various  
8             numbering issues and to participate in numerous state area code relief  
9             industry meetings and regulatory proceedings. I have been employed by  
10            the Company since February 1997. My responsibilities have included  
11            working on number conservation issues for the states of Texas,  
12            Minnesota, and Missouri.

13                    Prior to being hired by MCI WorldCom, I was employed by GTE  
14                    for 26 years, from 1969 to 1996. When I left GTE's employment, I was  
15                    Senior Product Manager-Switched Access. My responsibilities included  
16                    budgeting for Interexchange Access Revenues, new product development  
17                    (such as 500 and 555 Access) and all federal and state regulatory support  
18                    relating to Switched Access. Other responsibilities over the years have  
19                    been in Traffic Study Engineering, Capital Recovery, Depreciation,  
20                    Tariffs, Operations, Marketing, and Operator Services.

21       **Q:     HAVE YOU EVER TESTIFIED BEFORE THIS COMMISSION?**

22       A:     Yes, I have previously appeared as a witness before this Commission.  
23             My most recent appearance before this Commission was in Docket No.

1 980671-TL, regarding 407 Area Code relief.

2 **Q: ON WHOSE BEHALF ARE YOU APPEARING IN THIS**  
3 **PROCEEDING?**

4 A: I am appearing on behalf of MCI WorldCom, Inc., and its operating  
5 subsidiaries.

6 **Q: WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

7 A: The purpose of my direct testimony is to address whether code holders  
8 should be required to distribute telephone numbers consecutively. My  
9 testimony also includes a "Stipulation and Voluntary Number  
10 Management Measures," proposed by numerous members of the industry  
11 as a voluntary measure, which we respectfully request the Commission  
12 to accept.

13 **Q: SHOULD CODE HOLDERS BE REQUIRED TO DISTRIBUTE**  
14 **TELEPHONE NUMBERS CONSECUTIVELY, BEGINNING**  
15 **WITH THE LOWEST TELEPHONE NUMBER?**

16 A: No. Code Holders should not be required to distribute telephone numbers  
17 consecutively, beginning with the lowest telephone number. The term  
18 "sequential number assignment" has been applied to a process, but it is  
19 somewhat misleading. It would be more descriptive to refer to the  
20 process as being the "efficient use of thousand number blocks." A pure  
21 sequential number approach would fail to adequately take into  
22 consideration that some number blocks cannot readily be assigned to  
23 certain end users, such as business customers with PBXs or Centrex's

1 (i.e., the 0, 1, 8, and 9 thousand number blocks). The objective of the  
2 process is to retain as many poolable thousand blocks as possible until  
3 such time that thousand block number pooling is implemented.

4 **Q: SHOULD THE FLORIDA PUBLIC SERVICE COMMISSION**  
5 **REQUIRE ALL SERVICE PROVIDERS TO "EFFICIENTLY USE**  
6 **THOUSAND NUMBER BLOCKS"?**

7 A: No. Although I am not an attorney, based on my understanding of the  
8 FCC's Pennsylvania Numbering Order, the FCC declined to delegate to  
9 the states the task of NXX code allocation or assignment, stating that to  
10 do so would vest in fifty-one separate commissions oversight of functions  
11 that the FCC centralized in the new NANPA. (*Memorandum Opinion and*  
12 *Order and Order on Reconsideration*, CC Docket No. 96-98, September  
13 28, 1998, Par. 10) The Florida Public Service Commission, however, can  
14 encourage all service providers to efficiently use blocks of numbers.

15 **Q: WHAT ALTERNATIVES FOR NUMBER ADMINISTRATION**  
16 **WOULD BE APPROPRIATE?**

17 A: All NXX code holders should attempt to provide services in a manner  
18 which does not encourage the inefficient use or depletion of telephone  
19 numbers in any Florida NPA. All providers of telecommunications  
20 services who have accepted assignment of and make use of central office  
21 codes (NXXs) in Florida should preserve as many poolable blocks of  
22 thousand numbers in their central office codes as possible.

23

1       **Q:    WHAT ALTERNATIVE INTERIM MECHANISM FOR NUMBER**  
2       **ADMINISTRATION WOULD BE APPROPRIATE FOR THE**  
3       **COMMISSION TO ACCEPT?**

4       A:    On a voluntary basis, numerous members of the industry and other  
5       interested persons have been working to prepare a document that would  
6       address the Commission's concerns in this docket. Attached to my  
7       testimony as Exhibit SB-1, is a copy of the "Stipulation and Voluntary  
8       Number Management Measures" (Stipulation) which we respectfully  
9       request the Commission to accept. When implemented pursuant to the  
10      specified terms, the actions found in the Stipulation will be in the public  
11      interest.

12      **Q:    DOES THIS CONCLUDE YOUR TESTIMONY?**

13      A:    Yes, it does.

Law Offices  
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May 27, 1999

**BY HAND DELIVERY**

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket Nos. 990373-TP

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of the Joint Motion to Accept Stipulation and Voluntary Number Conservation Measures, Issue a Temporary Stay, and Request for Expedited Ruling in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

  
Floyd R. Self

FRS/amb  
Enclosure

cc: Tracy Hatch, Esq.  
Parties of Record

DOCKET NO. 990373-TP  
WITNESS: BROOKS  
EXHIBIT \_\_\_\_\_ (SB-1)  
PAGE 1 OF 22

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Establishment of a Statewide Emergency )  
Area Code Relief Plan )  
\_\_\_\_\_ )

Docket No. 990373-TP  
Filed: May 27, 1999

**JOINT MOTION TO ACCEPT STIPULATION  
AND VOLUNTARY NUMBER CONSERVATION MEASURES,  
ISSUE A TEMPORARY STAY,  
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 28-106.204, F.A.C., the carriers that have executed (hereinafter, collectively, the "Joint Movants") the attached Stipulation and Voluntary Number Conservation Measures ("Stipulation and Measures"), hereby respectfully request that the Florida Public Service Commission take the following actions: (a) approve such Stipulation and Measures according to its terms, (b) until such time as the Commission has the opportunity to rule on the Stipulation and Measures that the Commission or Prehearing Officer, as appropriate, issue a temporary stay of the requirements to file testimony and prehearing statements and, as necessary, the hearing scheduled for July 7 and 8, 1999, and (c) that such requests be handled on an expedited basis. In support of this Joint Motion, the Joint Movants state:

1. In response to the North American Numbering Plan Administration's ("NANPA") notification that a number of Florida NPAs are in jeopardy of premature exhaustion, the Florida Public Service Commission ("Commission") issued Order Number PSC-99-0606-PCO-TP and set for hearing the issue of statewide sequential or consecutive distribution of telephone numbers by telephone number code holders as a means of facilitating telephone number conservation.

2. Since the Commission first considered the matters that are the subject of this docket, numerous members of the industry and other interested persons have been working to prepare a document that would address the single issue now set for hearing on July 7 and 8, 1999.

3. Attached to this Joint Motion is the Stipulation and Voluntary Number Conservation Measures that have been prepared to resolve this docket. The Joint Movants believe that when implemented pursuant to its terms, the actions identified in the Stipulation and Measures will be in the public interest.

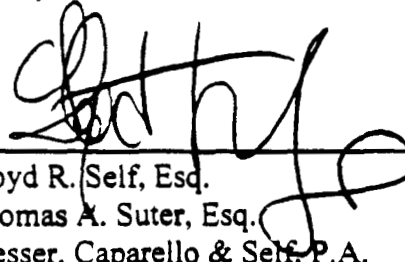
4. Because of the nature of such an undertaking, the Joint Movants have not been able to obtain the participation or agreement of every Florida NPA code holder. However, the Joint Movants believe that the Stipulation and Measures address eventual inclusion of such other code holders through other industry or regulatory processes. The Joint Movants contemplate that additional code holders will eventually add their signatures to the attached Stipulation and Measures or that the parties to this docket that have not executed the Stipulation and Measures will separately advise the Commission of their position regarding the Stipulation and Measures.

5. Undersigned counsel has the permission of each of the Joint Movants to represent that they join in this Joint Motion and have authorized undersigned counsel to submit this Joint Motion on their collective behalf.



WHEREFORE, the Joint Movants respectfully request that the Commission approve the attached Stipulation and Voluntary Number Conservation Measures according to its terms, grant the requested temporary stay so as to enable consideration of the Stipulation and Measures, and that the Commission handle these matters on an expedited basis.

Respectfully submitted, this 27<sup>th</sup> day of May, 1999 on behalf of the Joint Movants.



---

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Thomas A. Suter, Esq.  
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Counsel for AT&T Communications of the Southern  
States, Inc. and AT&T Wireless Services

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Establishment of a Statewide Emergency	)	Docket No. 990373-TP
Area Code Relief Plan	)	Filed: May 27, 1999
_____	)	

**STIPULATION AND VOLUNTARY NUMBER MANAGEMENT MEASURES**

WHEREAS, in response to the North American Numbering Plan Administration's ("NANPA") notification that a number of Florida NPAs are in jeopardy of premature exhaustion, the Florida Public Service Commission ("FPSC") established this docket to address emergency, interim number conservation measures;

WHEREAS, the FPSC issued Order Number PSC-99-0606-PCO-TP setting for hearing the issue of statewide consecutive distribution of telephone numbers by code holders;

WHEREAS, in *Memorandum Opinion and Order and Order on Reconsideration*, FCC 98-224 (Sept. 28, 1998), the Federal Communications Commission ("FCC") delegated limited authority to state commissions to order NXX Code rationing only in conjunction with the adoption of an area code relief plan and only if the industry is unable to reach consensus on a rationing plan;

WHEREAS, the undersigned Florida NXX code holders recognize the need for efficient number resource management;

WHEREAS, this Stipulation and Voluntary Number Management Measures are consistent with the directions and definitions in the Industry Numbering Committee (INC99-0127-23) 1000s Block (NXX-X) Pooling Administration Guidelines ("Guidelines") and follow the administration techniques and facilitate the efficient use of numbers as reflected in Section 2.7 of the Guidelines which provides that service providers shall establish internal policies and practices that provide for the efficient use and assignment of numbers to end users, that the policies and practices shall balance product specifications, market strategies and customer needs with conservation principles to ensure best practices and number utilization, and that service providers should attempt to assign telephone numbers out of a given block before making assignments out of another block;

WHEREAS, the undersigned Florida NXX code holders, without conceding jurisdiction to the FPSC to order specific number conservation and resource management measures in this docket, desire to implement a voluntary industry plan to preserve 1000s number blocks until such time as there is a lawful plan for number pooling or number conservation;

WHEREAS, the undersigned Florida NXX code holders believe that the prudent management of such 1000s number blocks will promote the efficient use of available numbering resources according to current applicable industry directions and guidelines and will help preserve these blocks in the event that 1000s number block pooling is implemented;

WHEREAS, the undersigned Florida NXX code holders believe that their voluntary 1000s number block management measures will provide a superior and more timely means of accomplishing the FPSC's objectives for this docket than the hearings scheduled for July 7-8, 1999; and,

WHEREAS, the undersigned Florida NXX code holders believe that the voluntary 1000s number block management measures detailed herein will alleviate the need for any further proceedings in this docket on consecutive numbering;

NOW, THEREFORE, the undersigned hereby request that the Commission issue an order closing this docket and the undersigned Florida NXX code holders do hereby agree to implement the following telephone number management measures:

1. Service Providers will set aside, within their telephone number ("TN") administration systems, uncontaminated 1000s number blocks. Each Service Provider will maintain no greater than nine (9) months of 1000s block TN resources to be used to meet customer demand. This type of variable demand analysis allows for the different telephone number demand patterns inherent in different geographic areas (e.g., rural central office versus urban central office) and is consistent with current Industry Numbering Committee ("INC") Thousand Block (NXX-X) Pooling Administration Guidelines and Central Office Code Administration Guidelines which employ similar threshold concepts (e.g., months to exhaust). Numbering resources will be moved a 1000s block of TNs at a time as required by the Service Provider in order to maintain the nine (9) months of TN inventory or to meet a specific customer requirement. If and when telephone number pooling is implemented in a specific rate center, LRN-LNP capable Service Providers will analyze their inventory of vacant 1000s blocks, as well as any qualified contaminated blocks, for potential contribution to an industry telephone number inventory pool. This would be done in accordance with procedures outlined in the final INC national telephone number pooling guidelines.
2. Service Providers will continue to operate within the existing national Central Office (CO) Code Assignment Guidelines and/or any Code Jeopardy procedures agreed to by the industry. This includes, but is not limited to, a Service Provider's ability to request additional NPA-NXX codes from the Code Administrator when projected customer demand will exhaust the Service Provider's existing TN inventory within the applicable months to exhaust in a code jeopardy situation, the preparation of the required

supporting documentation (i.e., Appendix B), and the certification that an NXX code request is in compliance with all requirements outlined in the Central Office Code Assignment Guidelines and Code Jeopardy procedures, as well as the TN Assignment Principles included herein.

3. Where practicable, Service Providers will set aside (i.e., restrict from assignment in their TN Assignment/Administration systems) all uncontaminated 1000s blocks. An uncontaminated 1000s block is defined as a block within which all TNs are available for assignment. As defined in the resolution statement of INC Issue 134, Common Number Status (Resolution date 4/26/99), telephone numbers unavailable for assignment include Assigned Numbers, Administrative Numbers, Aging Numbers, and Reserved Numbers. An Administrative Number is defined as any one of the following: 1) a number used for internal business or official purposes, 2) identical to a Location Routing Number (LRN), 3) a test number, 4) a Temporary Local Directory Number (TLDN), or 5) a Wireless E911 ERSD/ESRK Number.
4. Service Providers will not add to their inventory of available TNs for each rate center or switch, in case of a multiple switch rate center, until there is insufficient inventory to meet nine (9) months of projected customer demand. The nine (9) months of projected customer demand will be determined by analyzing the historical demand trends for business and residential customers, seasonal requirements, and volatile growth patterns of certain products and services (e.g., DID, Centrex, new services, Type 1 wireless interconnection).
5. Service Providers will release numbering resources in 1000s number blocks as required in order to maintain the nine (9) month inventory supply or to meet a specific customer requirement. Examples of a specific customer requirement would be the need for sequential 1000s blocks, a particular number series, or a bona fide customer request for a specific number.
6. Each NXX code holder shall submit utilization reports upon written request of the FPSC, but not exceeding twice per year. Reports submitted in response to the March 22, 1999, FPSC data request would be considered part of the semiannual request described in this paragraph. For code holders other than commercial mobile radio service ("CMRS") providers, the reports shall be on the basis of 1000s number blocks and no greater detail shall be required. The reports would measure adherence to these voluntary number administration proposals. These reports will continue to be submitted until actual number pooling is implemented or until such time as NANPA assumes this responsibility and provides aggregate data to the FPSC. Any such reports submitted to the FPSC will be submitted as confidential and proprietary information and should be considered as such by the FPSC under section

364.183(1), Florida Statutes. Because section 364.02(12), Florida Statutes, expressly exempts CMRS providers from the definition of "telecommunications company" for purposes of the FPSC's jurisdiction and because CMRS providers utilize NXX codes in a substantially different manner from landline carriers, CMRS providers will submit voluntary reports to the FPSC on an NXX basis, rather than a 1000s number block basis, with the understanding that such reports should be treated as confidential by the FPSC in view of their proprietary and trade secrets contents.

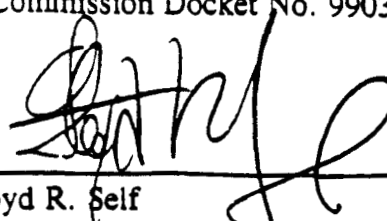
7. Not all Florida NXX code holders have taken part in this stipulation and its voluntary 1000s number block management measures. Therefore, the undersigned Florida NXX code holders agree that they will advocate the adoption of the voluntary 1000s number block management measures contained herein by all such other Florida NXX code holders.
8. This stipulation and the voluntary number management measures contained herein are entered into for purposes of settlement only. This document shall be valid and binding on the undersigned parties only to the extent it is adopted in its entirety as presented to the FPSC and only upon closure of the docket. Further, by virtue of the voluntary nature of the 1000s number block management measures agreed to herein, the issues set for hearing in this matter have been fully and completely resolved.
9. By agreeing to the voluntary 1000s number block management measures described herein, the undersigned Florida NXX code holders are not conceding that the FPSC has jurisdiction over numbering matters beyond the authority specifically delegated to the States by the FCC, that the FPSC has jurisdiction to implement number pooling, or that the FPSC has jurisdiction over CMRS providers. Accordingly, this document shall not be used by any person to assert that the undersigned have conceded jurisdiction on such issues or that they have waived any rights with respect to such jurisdictional issues.
10. This stipulation and its associated voluntary 1000s number block management measures shall take effect on the date that the FPSC closes this docket. Each undersigned NXX code holder shall implement the voluntary 1000s number block management measures described herein as quickly as possible, but in no event later than 60 days from the date the FPSC closes this docket.
11. If the Commission accepts this document and closes the docket, the undersigned shall not request reconsideration or appeal of the order of the Commission accepting this document in accordance with its terms.

12. Each undersigned Florida NXX code holder shall continue with the voluntary number management measures described herein until such time as there is a number pooling or 1000s number block conservation plan that includes Florida NXX code holders, whereupon such plan shall supersede the voluntary 1000s number block management measures described herein.
13. In the event that the FPSC does not accept this document in its entirety, this document shall not be admissible in the final hearing on the matters established by this docket, or in any other docket or forum. Moreover, no party waives any position on any issue that it could have otherwise asserted in the final hearing if this document had never been developed.

Respectfully submitted, this 27th day of May, 1999.

[Separate signature pages follow.]

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP



Floyd R. Self  
Messer, Caparello & Self, P.A.  
215 S. Monroe Street, Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720

Attorneys for AT&T Communications of the Southern States, Inc. and AT&T Wireless Services

The following hereby agrees to the Stipulation and Voluntary Number  
Management Measures submitted in Florida Public Service Commission Docket  
No. 990373-TP.



Nancy B. White  
Michael P. Goggin  
Counsel for  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558



The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 99-373-TP.

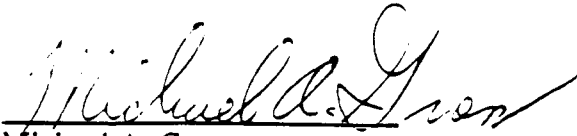


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Jill Nickel Butler  
State Regulatory Director  
Cox Florida Telcom, L.P. d/b/a Cox  
Communications

The following hereby agrees to the Stipulation and Voluntary Number Management

Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



Michael A. Gross

Vice President, Regulatory Affairs  
& Regulatory Counsel

Florida Cable Telecommunications Association\*

310 N. Monroe Street

Tallahassee, FL 32310

850/681-1990

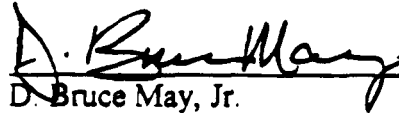
850/681-9676 (fax)

\*The following certificated telecommunications companies represented by FCTA take no position on this issue: Comcast MH Telephony Communications of Florida, Inc.; Comcast Telephony Communications of Florida, Inc.

DOCKET NO. 990373-TP  
WITNESS: BROOKS  
EXHIBIT \_\_\_\_\_ (SB-1)  
PAGE 13 OF 22

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

Dated this 26<sup>th</sup> day of May, 1999.



D. Bruce May, Jr.  
Florida Bar No.: 354473  
HOLLAND & KNIGHT LLP  
Post Office Drawer 810  
Tallahassee, Florida 32302

Attorneys for Florida Cellular Service, Inc.  
d/b/a BellSouth Mobility

The following hereby agrees to the Stipulation and Voluntary Number  
Management Measures submitted in Florida Public Service Commission Docket No.  
990373-TP.



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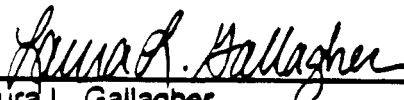
Kimberly Caswell  
Counsel for GTE Service Corporation  
GTE Florida Incorporated  
GTE Wireless Incorporated

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



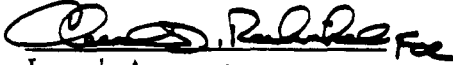
Donna Canzano McNulty  
Counsel for  
MCI WorldCom, Inc. and  
its operating subsidiaries  
325 John Knox Road  
The Atrium Building, Suite 105  
Tallahassee, FL 32303  
(850) 422-1254

MediaOne Florida Telecommunications, Inc. hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

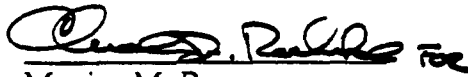
  
\_\_\_\_\_  
Laura L. Gallagher  
Attorney for MediaOne Florida  
Telecommunications, Inc.  
Dated: May 26, 1999

DOCKET NO. 990373-TP  
WITNESS: BROOKS  
EXHIBIT \_\_\_\_\_ (SB-1)  
PAGE 17 OF 22

The following hereby agree to the Stipulation and Voluntary Number Management measures submitted in Florida Public Service Commission Docket No. 990373-TP:



Joseph Assenzo  
Counsel for  
Sprint PCS

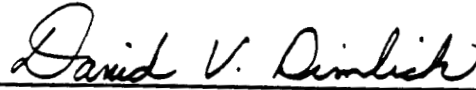


Monica M. Barone  
Counsel for  
Sprint Communications Company  
Limited Partnership



Charles J. Rehwinkel  
Counsel for  
Sprint-Florida, Incorporated

The following hereby agrees to the Stipulation and Voluntary Management  
Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



David V. Dimlich  
General Counsel  
2620 S.W. 27 Avenue  
Miami, Florida 33133  
(305) 476-4236

On Behalf of Supra Telecommunications &  
Information Systems, Inc.

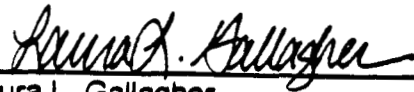
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WITNESS: BROOKS  
EXHIBIT \_\_\_\_\_ (SB-1)  
PAGE 19 OF 22



*Laura L. Gallagher, P.A.*

ATTORNEY AT LAW

Time Warner Telecom hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



Laura L. Gallagher  
Attorney for Time Warner Telecom  
Dated: May 26, 1999

DOCKET NO. 990373-TP  
WITNESS: BROOKS  
EXHIBIT \_\_\_\_\_ (SB-1)  
PAGE 20 OF 22

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Joint Motion to Accept Stipulation and Voluntary Number Conservation Measures, Issue a Temporary Stay, and Request for Expedited Ruling in Docket 990373-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 27th day of May, 1999.

Diana Caldwell, Esq.\*  
Division of Appeals, Room 310  
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2540 Shumard Oak Blvd.  
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Bruce May  
Holland & Knight  
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Nancy B. White, Esq.  
c/o Nancy H. Sims  
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Michael Gross  
Florida Cable Telecommunications Association, Inc.  
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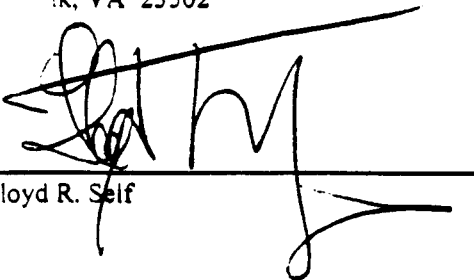
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EXHIBIT \_\_\_\_\_ (SB-1)  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Direct Testimony of Suzanne Brooks on behalf of MCI WorldCom, Inc. in Docket 990373-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 9th day of June, 1999.

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