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In re: Establishment of a Statewide )  
Emergency Area Code Relief Plan )  
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Docket No. 990373-TP

**DIRECT TESTIMONY OF RICHARD GUEPE**

**ON BEHALF OF**

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.**

**AND**

**AT&T WIRELESS SERVICES**

:

**June 9, 1999**

1 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.

2 A. My name is Richard Guepe, and my business address is 1200 Peachtree  
3 Street, N.E., Atlanta, Georgia 30309. I am employed by AT&T as a District  
4 Manager in the Law & Government Affairs organization.

5 Q. BRIEFLY OUTLINE YOUR EDUCATIONAL BACKGROUND AND  
6 BUSINESS EXPERIENCE IN THE TELECOMMUNICATIONS  
7 INDUSTRY.

8 A. I received a Bachelor of Science Degree in Metallurgical Engineering in 1968  
9 from the University of Notre Dame in South Bend, Indiana. I received a  
10 Masters of Business Administration Degree in 1973 from the University of  
11 Tennessee in Knoxville, Tennessee. My telecommunications career began  
12 in 1973 with South Central Bell Telephone Company in Maryville,  
13 Tennessee, as an outside plant engineer. During my tenure with South  
14 Central Bell, I held various assignments in outside plant engineering,  
15 buildings and real estate, investment separations and division of revenues.  
16 At divestiture (1/1/84), I transferred to AT&T where I have held numerous  
17 management positions in Atlanta, Georgia, and Basking Ridge, New Jersey,  
18 with responsibilities for investment separations; analysis of access charges  
19 and tariffs; training development; financial analysis and budgeting; strategic  
20 planning; regulatory issues management; product implementation; strategic  
21 pricing; and docket management.

22 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE

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**PUBLIC SERVICE COMMISSIONS?**

A. Yes, I have testified on behalf of AT&T in Florida, Alabama, Georgia, Mississippi, North Carolina, South Carolina, and Tennessee on product implementation issues, pricing issues, and policy issues.

**Q. ON WHOSE BEHALF ARE YOU APPEARING IN THESE PROCEEDINGS?**

A. I am appearing on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, a commercial mobile radio services ("CMRS") provider, which have intervened in this docket (which I will collectively refer to as "AT&T").

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to provide AT&T's position concerning the issue identified in this proceeding, which is whether there should be any requirement that code holders consecutively assign, beginning with the lowest assignable telephone number, all telephone numbers. My testimony explains why it would be inappropriate for this Commission to attempt to impose such a requirement. The best and quickest means of helping to conserve telephone numbers would be to allow the industry and the FCC to proceed with their efforts to implement number pooling on the basis of 1000s number blocks. As I will discuss, how you assign numbers within a 1000s number block does not matter so long as numbers within one 1000s number block are assigned or unavailable before numbers are assigned out of a new

1 1000s number block.

2 **Q. SHOULD THE COMMISSION REQUIRE CODE HOLDERS TO**  
3 **ISSUE TELEPHONE NUMBERS IN CONSECUTIVE ORDER?**

4 A. No.

5 **Q. WHY NOT?**

6 A As I understand the purpose of this docket, the Commission issued Order No.  
7 PSC-99-0606-PCO-TP setting this matter for hearing on the assumption that  
8 consecutive telephone number assignments would help preserve telephone  
9 numbers for number pooling. However, the current plans for number pooling  
10 anticipate that carriers will pool numbers on a 1000s number block basis.  
11 This means that when pooling begins, participating carriers (i.e., LRN/LNP-  
12 capable) will be able to contribute available 1000s number blocks to the pool.  
13 When participating carriers need numbers, they will be able to obtain  
14 numbers in groups as small as 1000 numbers instead of being required to take  
15 an entire NXX code with 10,000 numbers. When number pooling is fully  
16 implemented in this manner, it provides the best potential for reducing the  
17 demand for new NXX codes and, ultimately, NPA codes.

18 **Q. SO HOW DOES NUMBER POOLING MAKE CONSECUTIVE**  
19 **NUMBER ASSIGNMENTS UNNECESSARY?**

20 A. In practical terms, the only limitation on telephone number assignments in  
21 a number pooling environment is the need to stay within the opened 1000s  
22 number block. For pooling to work, it does not matter which 1000s block

1 within an NPA the carrier first uses to assign telephone numbers. Rather, so  
2 long as the carrier does not open a new 1000s number block until it is needed,  
3 the carrier may use telephone numbers from within an open 1000s number  
4 block in any order.

5 **Q. ASIDE FROM BEING UNNECESSARY FOR NUMBER POOLING,**  
6 **ARE THERE ANY PROBLEMS IN REQUIRING CONSECUTIVE**  
7 **TELEPHONE NUMBER ASSIGNMENTS?**

8 A. Yes, there are several important problems for customers. First, there are some  
9 equipment limitations that make the utilization of certain telephone number  
10 series unworkable for some customers. For example, some PBX customers  
11 cannot use telephone numbers from the 0, 1, 8, or 9 thousand blocks because  
12 those number series are used by the equipment to access the PBX attendant,  
13 toll services, or outside lines. If the carrier was required to assign numbers  
14 consecutively, such customers may be unable to obtain workable telephone  
15 numbers.

16 Similarly, customers often require large blocks of telephone numbers.  
17 For various individual reasons, these customers need numbers from a  
18 particular 1000 or 100 number series. Again, the carrier would be unable to  
19 meet the customer's needs if required to assign the next available consecutive  
20 telephone number.

21 In addition, carriers may have internal number assignment  
22 management issues that make true consecutive number assignments very

1 difficult. For example, reseller carriers of a code holder's services may have  
2 to assign numbers from specific number groups that are not otherwise  
3 available to the code holder's own customers. Further, the code holder's own  
4 telephone number assignment procedures may preclude the issuance of  
5 consecutive numbers due to such operational considerations as whether the  
6 carrier maintains multiple customer service centers or how the carrier ages  
7 terminated numbers before they are made available for reuse.

8 Finally, some customers may desire specific number assignments or  
9 may want to avoid certain numbers or number combinations for individual,  
10 personal reasons. Requiring consecutive numbering would preclude a carrier  
11 from meeting these unique customer needs.

12 **Q. ARE THERE ANY OTHER REASONS FOR THE COMMISSION TO**  
13 **NOT REQUIRE CODE HOLDERS TO ISSUE TELEPHONE**  
14 **NUMBERS IN CONSECUTIVE ORDER?**

15 A. As I previously mentioned, the industry and the FCC have been working to  
16 implement number pooling and other number conservation measures. The  
17 Industry Numbering Committee ("INC") has issued national 1000s Block  
18 (NXX-X) Administration Guidelines that include provisions for the efficient  
19 use of numbers in anticipation of national number pooling. These Guidelines  
20 provide that carriers shall establish internal policies and practices that provide  
21 for the efficient use and assignment of numbers to end users, that carriers'  
22 policies and practices shall balance product specifications, market strategies,

1 and customer needs with conservation principles to ensure best practices and  
2 number utilization, and that carriers should attempt to assign telephone  
3 numbers out of a given block before making assignments out of another  
4 block. Closer to home, a group of Florida NPA code holders, including  
5 AT&T, have offered to voluntarily act to preserve 1000s number blocks in  
6 anticipation of the implementation of national standards for number pooling.  
7 This proposal by the Florida code holders is especially important because it  
8 includes the commitment of several wireless carriers, including AT&T's  
9 CMRS provider, to work to preserve 1000s number blocks.

10 At the federal level, on June 2, 1999, the FCC released its Notice of  
11 Proposed Rulemaking, FCC 99-122 ("NPRM"), on numbering resource  
12 optimization. The NPRM proposes several numbering optimization  
13 solutions, including number pooling and 1000s number block management  
14 (which the NPRM refers to as "sequential number assignment" in paragraphs  
15 190-191). This action by the FCC is based upon the Telecommunications  
16 Act of 1996 and its assignment of exclusive numbering authority to the FCC.  
17 Pursuant to that statutory authority, the FCC's September 28, 1998  
18 Memorandum Opinion and Order and Order on Reconsideration, FCC 98-  
19 224 ("Pennsylvania Order"), retained all numbering authority except for the  
20 limited delegation of authority to the states to deal with NPA relief planning,  
21 which is different from statewide telephone number assignments by all code  
22 holders. It seems inappropriate and unnecessary for the industry and

1 Commission to expend valuable resources litigating the extent of the  
2 Commission's authority to require the statewide assignment of telephone  
3 numbers on a consecutive order basis when what the Commission seeks to  
4 achieve is already being addressed.

5 **Q. HAS AT&T PARTICIPATED IN THESE ACTIVITIES?**

6 A. Yes. AT&T has participated in the industry meetings that led to the filing of  
7 the Stipulation and Voluntary Number Conservation Measures, we have  
8 participated in the various FCC proceedings on number utilization and  
9 conservation, and we participate on various industry committees, including  
10 INC. We will continue to do all we can to preserve and conserve telephone  
11 numbers and encourage others to do the same.

12 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY.**

13 A. While I can appreciate the Commission's frustration with having to deal with  
14 NPA jeopardy and exhaust situations, progress is being made and will  
15 continue to be made in the development of a national system to better  
16 preserve and utilize telephone numbers. An optimal process to ensure  
17 efficient number assignment, as sought by this Commission, would produce  
18 policies and practices that balance market needs and customer needs with  
19 conservation principles to ensure best practices and number utilization.  
20 Mandatory consecutive number assignment does not achieve this. On the  
21 other hand, the voluntary 1000s number block management measures in the  
22 proposed industry stipulation on number management, together with the



1 ongoing efforts of the industry and FCC, will provide a superior and more  
2 timely means of accomplishing the objective of maximizing the number of  
3 1000s number blocks available for number pooling when it is implemented.  
4 An added benefit of the industry stipulation is that it represents the voluntary  
5 efforts by many different carriers and different types of carriers, including  
6 participation by many wireless carriers, which helps to avoid the potentially  
7 contentious jurisdictional questions that would distract us all from the  
8 promotion of efficient number management.

9 In the final analysis, it is best to allow the national processes to  
10 continue without distracting the code holders from implementation of these  
11 national solutions by having to deal with individual state solutions that could  
12 delay or complicate the implementation of national number conservation  
13 efforts. In the interim, this Commission should allow the carriers to continue  
14 to work toward the implementation of these national solutions and allow  
15 them to employ the voluntary number conservation measures that have been  
16 filed in this docket.

17 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 **A. Yes, it does.**

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Direct Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services 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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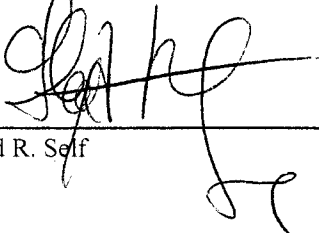
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