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June 18, 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

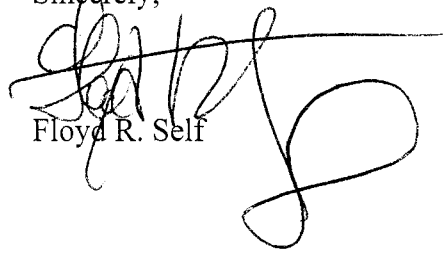
Dear Ms. Bayo:

Enclosed for filing in the above captioned docket are an original and fifteen copies of the Rebuttal Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services. An electronic copy of this testimony also is available on our Internet web site at <www.lawfla.com/website/documents.html>.


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

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2 FRS/amb
3 Enclosure
cc: Tracy Hatch, Esq.
Parties of Record

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

2 A. I am Richard Guepe, and my business address is 1200 Peachtree Street, N.E.,
3 Atlanta, Georgia 30309.

4 **Q. ARE YOU THE SAME RICHARD GUEPE THAT FILED DIRECT**
5 **TESTIMONY IN THIS CASE ON BEHALF OF AT&T**
6 **COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND**
7 **AT&T WIRELESS SERVICES?**

8 A. Yes, I am.

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

10 A. The purpose of my rebuttal testimony is to respond to several points made by
11 Ms. Arvanitas in her direct testimony. My direct testimony and the testimony
12 of the other carrier witnesses rebut most of the issues Ms. Arvanitas raises.
13 However, there are several misconceptions that do require a separate
14 response, and I will briefly address those matters.

15 **Q. WHAT ARE THE ADDITIONAL POINTS YOU WOULD LIKE TO**
16 **MAKE IN RESPONSE TO MS. ARVANITAS TO CLEAR UP THE**
17 **RECORD IN THIS CASE?**

18 A. Ms. Arvanitas appears to misunderstand several important aspects of number
19 assignment and utilization. First, there is a significant difference between
20 equipment becoming obsolete due to the introduction of interchangeable
21 NPA and NXX codes and the advent of 10-digit dialing versus the way PBX
22 equipment routes and handles calls. The problems I and several other

1 witnesses have identified for PBX customers being unable to use 1000s
2 number blocks that begin with 0, 1, 8, or 9 relate to basic but necessary
3 dialing sequences that over time have become standardized to 0, 1, 8, and 9.
4 For example, a PBX customer must use some number to dial an outside local
5 or long distance number. If the PBX did not use 9 for a local call, then it
6 would have to use some other number between 0 and 8, which would leave
7 us with the same problem that 9 creates. Similarly, if the PBX customer did
8 not use 0 to reach the PBX operator/attendant, then some other number would
9 be needed. Buying new equipment or software will not change the
10 fundamental problems associated with the use of the 0, 1, 8, or 9 1000s
11 blocks by PBX customers.

12 A second matter I would like to address is Ms. Arvanitas' testimony
13 regarding lines with multiple numbers. It is not clear to me whether she is
14 unhappy with the fact that one line can have different telephone numbers
15 associated with it (such as with DID or 800 numbers) or with the fact that
16 such customers do not pay a line charge for each number. Regardless of her
17 stated concern, such numbers are very important and beneficial to customers
18 and carriers. For instance, without DID numbers, local carriers would have
19 to deploy excessive amounts of local loops and other supporting equipment,
20 and local customers would have to pay for such additional, unnecessary
21 equipment. Thus, the fact that DID numbers are made available to customers
22 is wholly irrelevant to the question of whether carriers should assign numbers

1 on a consecutive number basis.

2 Finally, with respect to her "jurisdictional problem," our attorneys
3 will address the legal issues that now have been separately identified for this
4 proceeding. However, it is my understanding that this Commission does not
5 have the authority to impose consecutive numbering requirements on Florida
6 NXX code holders.

7 **Q. DO YOU HAVE ANY CONCLUDING REMARKS ABOUT MS.**
8 **ARVANITAS' DIRECT TESTIMONY?**

9 A. Overall, Ms. Arvanitas' comments about telephone number utilization miss
10 the point. Utilization of an NXX code is what it is -- numbers are either
11 available for assignment or they are not. However, how you assign numbers
12 within an NXX code can impact whether numbers are being used in the most
13 efficient manner and in a manner that would maximize the potential for
14 number conservation and number pooling. As is clear from my direct
15 testimony and that of the other carriers in this docket, the best and most
16 practical means of conserving 1000s number blocks for number pooling is to
17 properly manage 1000s number blocks. Telephone numbers should be
18 managed in the public interest, and the voluntary number management
19 measures that have been proposed by the industry in Florida do just that since
20 any number pooling plan likely put into effect will pool numbers at the
21 1000s block level. For this Commission to attempt to impose a consecutive
22 numbering requirement would be counterproductive to good number

1 management practices. The answer to this situation is not to continue
2 unnecessary litigation, but rather, to allow the carriers to move forward with
3 the best and most immediate means of preserving numbers for number
4 pooling.

5 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

6 **A. Yes.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Rebuttal 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 18th day of June, 1999.

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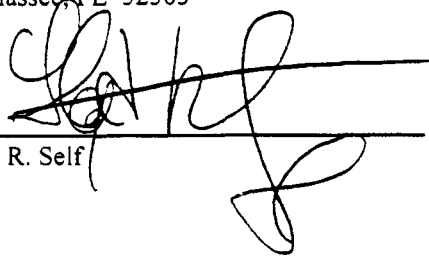
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