

Before the
STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In re: Investigation of proposed updates to the Routing Data Base System (RDBS) and Business Rating Input Database System (BRIDS) affecting the Tampa telecommunications carriers.

Docket No. 010102-TP

Direct Testimony

of

CRAIG TYSTAD

on behalf of

Time Warner Telecom of Florida, LP

February 21, 2001

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1 INTRODUCTION

2 QUALIFICATIONS

3 **Q: Please state your name, position, and business address.**

4 A: My name is Craig Tystad. I am the Director of Operations Planning for Time
5 Warner Telecom. My business address is 5613 DTC Parkway, Englewood, CO
6 80111.

7 **Q: Please summarize your educational background and previous experience in**
8 **the telecommunications field.**

9 A: I have nineteen years of experience in the engineering and operations areas of
10 telecommunications. Before coming to Time Warner Telecom, I was employed
11 by US West in operational and engineering managerial positions from 1979
12 through 1993. When I came to Time Warner Telecom in 1993, I planned and
13 implemented TWTC's switching services including the management of all
14 aspects of switched services: service provisioning, networks inventory, capacity
15 management, telephony number administration, inter-company compensation,
16 message processing, switch surveillance, and trouble management for seventeen
17 Lucent 5ESSs. Since 1997, I have been in my current job capacity and am
18 responsible for setting company policy and direction in relation to operation
19 support systems, new technology implementation, and new product
20 development. Please find attached my vitae.

21 **Q: Have you previously testified before the Florida Public Service Commission**
22 **("Commission")?**

23 A: No.

1 **SUMMARY OF TESTIMONY**

2 **Q: On whose behalf is this testimony offered?**

3 A: I am testifying on behalf of Time Warner Telecom of Florida, L.P.

4 **Q: What is the purpose of your testimony?**

5 A: My testimony responds to the tentative issues designated in Order No. PSC-01-
6 0380-PCO-TP, by discussing the impact on TWTC of Verizon's intent to
7 expand from one rate center to five in the Tampa area.

8 **Q: Please summarize your testimony.**

9 A: Currently, the Tampa area has different rate center designations for Verizon and
10 the ALEC's serving customers in that area. According to its tariff, Verizon has
11 five rate centers in the Tampa area, e.g., Tampa Central, North, South, East and
12 West. However, ALEC's entering the marketplace in Tampa have used the
13 LERG to set up their dialing and routing plans, which includes only one
14 "Tampa" rate center and encompasses all five of the above-listed rate centers.

15 On February 1, 2001, Verizon made changes to the LERG, against this
16 Commission's instructions, to bring the LERG in line with the rate centers that
17 their local exchange tariff identified. These changes created significant
18 discrepancies in the Tampa area based upon the differing treatment of rate
19 centers by Verizon and the ALECs. Verizon should be ordered to "undo" their
20 modifications immediately, to avoid the premature exhaustion of the 813 area
21 code and to avoid undue burdens and costs on ALECs.

22 Additionally, TWTC supports rate center consolidation. Most of
23 TWTC's customers are in Tampa Central (with a few in Tampa East). Rate

1 Center consolidation would mean that the local calling area would increase for
2 TWTC's Tampa Central & East customers. Using the Verizon General Services
3 Tariff - A3.5.1 Local Calling Areas, TWTC's local calling area (for
4 Central/East) would expand to include Zephyrhills, Palmetto, New Port Richey
5 and Clearwater. Since most customers PIC their intra-LATA toll to their long
6 distance carrier, any lost revenue to the exchanges would be minimal. Also,
7 having more than one rate center will require ALECs to acquire additional
8 numbering resources, and would force ALEC's customers to change their phone
9 numbers.

10 **RESPONSES TO TENTATIVE ISSUES LIST ATTACHED TO**
11 **ORDER ESTABLISHING PROCEDURE**

12 **Q: Should the Tampa Market Area be considered one rate center? If not, what**
13 **rate centers should be associated with the Tampa Market Area?**

14 A: Yes, the Tampa Market Area should be considered one rate center since the
15 more rate centers there are, the more numbering resources will be required due
16 to competition. TWTC supports rate center consolidation to one rate center in
17 order to forestall premature exhaust of the 813 NPA, in addition to facilitating
18 any future numbering resource optimization efforts that may take place.

19 **Q: How would multiple rate centers impact the numbering resources in the**
20 **Tampa Market Area?**

21 A: Currently TWTC has 4 NXX's that serve the entire Tampa area. In order for
22 TWTC to serve customers in the five rate centers designated by Verizon, TWTC
23 would be required to designate the codes we currently have to the rate center

1 covering the area where the predominate number of our customers physically
2 reside. TWTC would then have to request initial codes in the other four rate
3 centers in order to bring customers into alignment with Verizon's rate centers,
4 and to allow customers to participate in porting. As a result, customers may be
5 forced to take a number change to a new area code.

6 This would be the case with each of the approximately 32 ALEC's in the
7 Tampa area. Each ALEC would be required to go to the NANPA and request a
8 new NXX for four additional rate centers. This instantly increases the amount
9 of assigned NXX's to 128, and could contribute to the premature exhaust of the
10 813 NPA, in addition to causing customer dissatisfaction due to required number
11 changes.

12 **Q: What effect will Verizon's changes to its Routing Database System (RDBS)**
13 **and Business Rating Information Database System (BRIDS) have on other**
14 **telecommunications carriers in the Tampa Market Area? What effect**
15 **would one or more rate centers have on telecommunications carriers in the**
16 **Tampa Market Area?**

17 **A:** Terminating calling plans from outside the Tampa area may disadvantage
18 TWTC. For example, as the table below demonstrates, a terminating calling
19 plan from the Lakeland rate center into the Tampa area must be defined by
20 Verizon for six different rate centers, Tampa, Tampa Central, Tampa South,
21 Tampa North, Tampa East, and Tampa West. The Tampa rate center may be
22 designated as a toll call from Lakeland, whereas all other rate centers may be
23 designated as a local call from Lakeland. TWTC would have no control over

1 the determination of whether the call is toll or local, thereby negatively
2 impacting TWTC.

Calling Plan for Lakeland		
Calls to	Worst Case	Best Case
Tampa	Toll	Local
Tampa Central	Local	Local
Tampa North	Toll	Toll
Tampa South	Toll	Local
Tampa East	Toll	Toll
Tampa West	Toll	Toll

3

4 These changes include changes in local and toll calling scopes, changes
5 in reciprocal compensation obligations, the need for some customers to receive
6 new telephone numbers because of reassignment to a different rate center, the
7 potential premature exhaust of the 813 NPA through additional numbering
8 resources needed by each ALEC to address customer needs in five rate centers
9 instead of one, and even changes in the applicability of access charges on certain
10 calls.

11 Having more than one rate center will require ALECS to acquire
12 additional numbering resources which will in turn require customers of ALECs
13 to change their phone numbers, putting ALECs at a competitive disadvantage.
14 Additionally, porting rules state that porting cannot take place outside the rate
15 center. Therefore, if a TWTC customer in the "Tampa" rate center wants to port

1 to Verizon in the Tampa Central rate center, the TWTC customer would be
2 forced to take a number change since the rate center designations do not match.
3 This would also be the same if a Verizon customer ported to TWTC. Rate
4 center designations must match in order to follow porting rules.

5 **Q: Should a number pooling trial be implemented in the Tampa Metropolitan**
6 **Statistical Area? If so, when should the number pooling trial begin?**

7 A: Yes, and the trial should be begin July 1, 2001. Number pooling mandates that
8 there be a separate number pool established for each rate center. In the Tampa
9 area, there would be six separate number pools, one for each rate center, i.e.
10 Tampa (ALEC's), Tampa Central, Tampa North, Tampa South, Tampa East,
11 and Tampa West (Verizon). The problem this creates is that the ALEC's, of
12 which there are approximately 32, would donate and participate in one number
13 pool for the "Tampa" rate center. Verizon would donate, to themselves, and be
14 the only service provider to participate in the other five rate center pools, since
15 the ALEC's do not have numbers designated for the five Verizon rate centers.
16 This process defeats the purpose of number pooling as an optimization method
17 within the 813 NPA.

18 **Q: What other number conservation measures, if any, should the Commission**
19 **order in the Tampa Market Area? If other number conservation measures**
20 **should be implemented, when should these measures be implemented?**
21 **How should the cost recovery be established?**

22 A: Rate center consolidation is a conservation measure that should be ordered for
23 the Tampa Market Area. Rate center consolidation should be implemented

1 immediately. Each carrier should absorb the costs of implementing rate center
2 consolidation.

3 **Q: Should Verizon be ordered to implement rate center consolidation in the**
4 **Tampa Market Area?**

5 A: Yes.

6 **Q: If Verizon should be ordered to implement rate center consolidation in the**
7 **Tampa Market Area, how many rate centers should be consolidated? and if**
8 **so, how should it be implemented?**

9 A: There should be one rate center for the Tampa area.

10 **Q: When should the rate center consolidation be effective?**

11 A: Rate center consolidation should be ordered immediately with completion as
12 soon as practicable.

13 **Q: Should Verizon be allowed to recover its costs upon consolidation of its rate**
14 **centers in the Tampa Market Area? If so, how?**

15 A: As stated above, all carriers, including Verizon, should absorb the costs of
16 implementing rate center consolidation in Tampa.

17 **Q: Should Verizon be required to undo changes made prior to August 15,**
18 **2000, in its RDBS and BRIDS systems? If so, should Verizon be required to**
19 **file a revised Tariff reflecting one Tampa Rate Center?**

20 A: Yes, and Verizon should be required to file a revised tariff reflecting one rate
21 center for the Tampa market area. Implementation of the proposed
22 modifications to the RDBS and the BRIDS could result in the premature
23 exhaustion of NPA 813. If the Commission does not take immediate action to

1 cease further updates to the RDBS and the BRIDS, all ALECs in the Tampa area
2 will be required to obtain NXX codes in all five Tampa rate centers, effective
3 May 1, 2001. Therefore, Verizon should be required to “undo” changes made
4 prior to August 15, 2000 in its RDBS and BRIDS systems in order to effectuate
5 rate center consolidation in the Tampa area.

6 **Q: Does this conclude your testimony?**

7 A: Yes.

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Summary of Qualifications

- Nineteen years in the engineering and operations areas of telecommunications.
- A comprehensive knowledge of telephony networks and products.
- Strong leadership abilities in vendor management, financial controls, equipment selection & procurement, and inventory control.
- Solid skills in strategic planning, defining business needs, and developing solutions to meeting services objectives.

Experience

Director of Operations Planning

Time Warner Telecom
Denver, Colorado, 1997 - present

Set Company direction and policy in relation to operation support systems, new technology implementation, and new product development.

- Leading the concept design, selection, and implementation of the operational support systems for switched and transport services.
- Directing the implementation team for TWTC's electronic bonding with trading partners solution.
- Own TWTC's policy and processes for telephone number administration.
- Liaison with regulatory department to develop policy and legal positions.
- My team represents TWTC in industry forums (LNP, INC, OBF).

Director of Switching Operations

Time Warner Telecom
Denver, Colorado, 1993 - 1997

Plan and implement TWTC's switching services as a CLEC in a competitive environment.

- Managed all aspects of switched services: service provisioning, networks inventory, capacity management, telephony number administration, inter-company compensation, message processing, switch surveillance, and trouble management of 17 Lucent 5ESS.
- Rolled out residential dialtone services over Time Warner's cable TV network via hybrid fiber coax (HFC) technology.
- Hired an experienced and strong staff of technical experts to design, implement, provision and maintain TWTC's Network.

Manager of Equipment Engineering

US West Communications
Omaha, Nebraska, 1990-1993

Develop a highly effective engineering team and made Omaha, NE the testing ground of US WEST Communications' networks.

- Develop & manage \$43 million central office equipment capital budget.
- Maintain the 1992 capital budget within 1% of plan.
- Lead the engineering component of PC/Phone trial, to provided ubiquitous ISDN across all Omaha metro locations.
- Lead Omaha performance monitoring field trial. This involved installing DACS in 11 Central Offices and aggressively cutting all new and existing service onto the DACS. This resulted in improved Customer HICAP services for provisioning and maintenance.

Manager of Operations—Switching & Toll

US West Communications
Nebraska & South Dakota, 1979 – 1990

Lead an aggressively effort to update the technology in Nebraska from analog technology to digital technology.

- Managed 71 people in the switching and toll department for outstate Nebraska.
- Four year program to upgrade 98 central offices.
- Five year program to upgrade 1700+ miles of toll facilities to fiber.
- Planned and organized the implementation of the Grand Island ESS Switching Control Center. Managed the Toll and Switching Control Center for outstate Nebraska.
- Planned, coordinated, and managed the conversion of three access tandems.

CERTIFICATE OF SERVICE
DOCKET NO. 010102

I HEREBY CERTIFY that a true and correct copy of the foregoing **Direct Testimony of Craig Tystad offered on behalf of Time Warner Telecom of Florida, L.P.** has been served by U.S. Mail on this 21st day of February, 2001, to the following parties of record:

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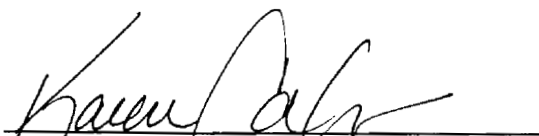
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