

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of ) DOCKET NO. 000604-TL  
proposed numbering plan relief )  
For the 941 area code. ) FILED: July 5, 2001  
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**PREHEARING STATEMENT OF VERIZON WIRELESS**

**VERIZON WIRELESS** hereby files its prehearing statement pursuant to Order Nos. PSC-01-0093-PCO-TL and PSC-01-0816-PCO-TL and Commission Rule 25-22.038.

**A. WITNESSES**

Dana Smith, Technical Staff,  
Numbering Policy & Standards

**ISSUES**

All

**B. EXHIBITS**

None.

**C. BASIC POSITION**

The Commission should approve the industry consensus relief plan, which is an all-services distributed overlay. Although no solution is without cost or customer impact, the overlay proposal best serves the public interest because it is practical, cost-effective, flexible, fair, and forward-looking. An overlay best meets the goal of providing long-term area code relief while causing the least possible customer disruption. With an overlay there is no need to pick winners and losers, by allowing only one side of a split to retain existing phone numbers. An overlay also eliminates the often daunting task of determining the best location for the split line so that it does not interrupt local calling areas, county boundaries, or communities of interest.

Verizon Wireless opposes a geographic split. Although the Commission traditionally has preferred geographic splits, it is yesterday's solution to today's problem. Geographic splits place a significant and undue burden on wireless customers and carriers because of the corresponding need to reprogram wireless handsets.

**D. QUESTIONS OF FACT:** None.

**E, F. QUESTIONS OF LAW AND POLICY AT ISSUE AND VERIZON WIRELESS'S POSITION ON EACH ISSUE**

**Issue A:** What is the Commission's jurisdiction in this matter?

**Verizon Wireless' Position:** Verizon Wireless will address this legal question in its post hearing brief.

**Issue 1:** Should the Commission approve the industry's consensus relief plan for the 941 area code?

**Verizon Wireless' Position:** Yes. The Commission should approve the industry's consensus relief plan for the 941 area code: an all-services distributed overlay. Verizon wireless supports an all-services overlay for the 941 area code for 3 key reasons:

**Overlays Minimize Customer Disruption Caused By Frequent Area Code Changes**

- Many customers are forced to change their telephone numbers during a geographic split.
- Geographic splits place a significant and undue burden on wireless customers and carriers because of the need to reprogram tens of thousands of handsets during the time between the start of permissive dialing and the start of mandatory dialing.
- Unlike wireline telephone numbers, the telephone number of each cellular phone customer is programmed into the customer's individual phone. The telephone number in each VZW handset uniquely identifies that handset to the wireless network for purposes of call registration, set-up, routing, and billing. The assigned number cannot be changed at the switch, but rather must be done for each individual handset.
- The Commission can spare wireless customers from this reprogramming burden by ordering implementation of an overlay.

## **With An Overlay There Is No Need To Draw A Boundary And To Guess At Growth Projections**

- Drawing split lines requires the difficult task of estimating growth patterns to try to optimize the life of the codes, splitting communities of interest and picking winners and losers (since all customers and businesses will want to keep their current area code). With an overlay, all existing customers keep their area code for their existing services.
- Several states have ordered overlays recently including North Carolina, Georgia, Maryland, Alabama and New Jersey. According to the Michigan Commission, "...research indicates that overlays have become much more accepted throughout the country over the last few years. As of February 2001, nearly 75% of the pending area code relief plans approved by state commissions have been in the form of overlays." Many of these states implemented overlays because overlays do not require changing existing customer numbers and prevent divisions of existing communities of interest.
- These state commissions also found that the perceived advantage of geographic splits of avoiding 10-digit dialing was illusory as people from divided communities of interest continue to dial 10 digits across the split line to reach people and businesses in the separated area.

## **Overlays Work Well In Conjunction With Conservation Measures Such As Thousands-Block Number Pooling And Reclamation**

- Numbers freed up through conservation measures the Commission may undertake (including pooling and reclamation) can be reassigned and used throughout the NPA. If more relief is necessary in the future, an overlay would allow relief to be added easily with very little customer impact. New area codes can be added without splitting communities or drawing difficult boundaries.

Given these benefits, the overlay proposal is the most cost-effective solution; it is the least confusing and least disruptive to both landline and wireless customers, and it will facilitate efficient utilization of numbers in the future. The alternative geographic split proposals are disproportionately burdensome for wireless customers who are located on the losing side of the split line, because their telephones would have to be reprogrammed. Verizon Wireless alone serves tens of thousands of such customers.

**Issue 2:** If the Commission does not approve the industry's consensus relief plan for the 941 area code, what alternative relief planned should the Commission implement?

**Verizon Wireless' Position:** Verizon Wireless strongly supports implementation of an overlay because all three of the geographic split alternatives will impact our customers and business negatively. An overlay makes sense given the history of this area code and the fact that the 941 NPA was split just last year. Mandatory dialing for the 941/863 split began May 22, 2000 and by July 2000 the industry was already attending a new round of relief planning meetings for the 941 NPA due to the faulty split line. An overlay is warranted this time around to avoid the difficulties of determining an appropriate split line and to avoid fracturing the 941 NPA into even smaller parts.

If, however, the 941 area code is split, wireless carriers should be given the option to allow their subscribers to keep their existing telephone numbers (*e.g.* wireless grandfathering) or be granted an extended permissive dialing period allowing sufficient time to reprogram their customers' phones. Many other states, including Michigan, Virginia, Arizona, Wisconsin, and Louisiana have provided for wireless grandfathering or have allowed extended permissive dialing.

**Issue 3:** What number conservation measures, if any, should the Commission implement?

**Verizon Wireless' Position:** This issue should be addressed in the generic proceeding (Docket No. 981444-TP). In general, the Commission should adopt conservation measures that conform to national standards. Such measures would include reasonable reclamation procedures, fill rates, and thousand-block pooling to facilitate local number portability. These measures must promote, not frustrate, the ability to satisfy customer demand for new numbers. Thus, conservation measures must be flexible and must enable non-pooling capable carriers to access full NXX codes. For example, in establishing fill rates, the Commission should implement a "safety valve." A safety valve

would allow a carrier, under appropriate circumstances, to access numbers when necessary to meet customer demands for numbers.

**Issue 4:** If the Commission is to implement number conservation measures, when should it do so?

**Verizon Wireless' Position:** The Commission should implement number conservation measures as soon as practicable. Number conservation is not, however, a substitute for area code relief when the area code is already too depleted to meet the numbering needs of all carriers.

**G. STIPULATED ISSUES:** None.

**H. PENDING MOTIONS:** None.

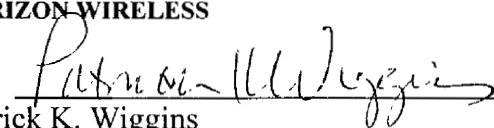
**I. REQUIREMENTS WITH WHICH VERIZON WIRELESS**

**CANNOT COMPLY:** None.

Respectfully submitted this 5th day of July, 2001.

**VERIZON WIRELESS**

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Prehearing Statement of Verizon Wireless has been furnished by U.S. Mail to the following this 5th day of July, 2001.

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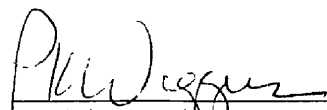
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