

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

October 5, 2001

Mrs. Blanca S. Bay6  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 010743-TL (407/321 Area Codes)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Stan L. Greer, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "James Meza III /V.F.". The signature is written in a cursive style with a large initial "J" and a stylized "M".

James Meza III

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

**CERTIFICATE OF SERVICE**  
**Docket No. 010743-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 5th day of October, 2001 to the following:

Patricia Christensen  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Fritz Behring, City Manager  
City of Deltona  
P.O. Box 5550  
800 Deltona Blvd.  
Deltona, Florida 32728  
Tel. No. (407) 860-7160  
Fax. No. (407) 860-7161  
**fberhing@ci.deltona.fl.us**

Carole Joy **Barice**, Esq.  
James A. Fowler, Esq.  
Fowler, **Barice**, Feeney & O'Quinn, P.A.  
28 W. Central Blvd.  
Orlando, FL 32801

Robert M. Weiss  
Communications Director  
County of Volusia  
123 West Indiana Avenue  
**DeLand**, Florida 327204615

Frank B. Gummy, III  
Assistant County Attorney  
County of Volusia  
123 West Indiana Avenue  
**DeLand**, Florida 327204613

Morrison & Foerster Law Firm  
Kimberly D. Wheeler  
2000 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006-1 888  
Tel. No. (202) 887-1500  
Fax. No. (202) 887-0763

**NeuStar**, Inc.  
Thomas C. Foley  
820 Riverbend Blvd.  
Longwood, FL 32779  
Tel. No. (407) 3898929  
Fax. No. (407) 682-1 108  
**thomas.foley@neustar.com**

Pennington Law Firm  
Peter **Dunbar/Karen** Camechis  
P.O. Box 10095  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
**pete@penningtonlawfirm.com**

Time Warner Telecom of Florida, L.P.  
Ms. Carolyn Marek  
c/o Time Warner Telecom  
Franklin, TN 370694002  
Tel. No. (615) 3766404  
Fax. No. (615) 3766405  
**carolyn.marek@twtelecom.com**

Susan S. Masterton  
Sprint  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
**susan.masterton@mail.sprint.com**

Jeff Pfaff  
Sprint PCS  
Legal Department  
4900 Main Street, 1 lth Floor  
Kansas City, MO 64112  
Tel. No. (816) 559-1000

Anne E. **Hoskins**  
Verizon Wireless  
Regulatory Counsel  
Lolita D. Smith  
Associate Director Regulatory Matters  
1300 I Street, N.W., Ste. 400 West  
Washington, D.C. 20005

Patrick K. Wiggins  
Natalie B. **Futch**  
Katz, Kutter, Haigler, Alderman,  
Bryant & Yon, P.A.  
106 East College Avenue  
Tallahassee, FL 32301  
Tel. No. (850) 224-9634  
Fax. No. (850) 222-0103  
Represents Verizon Wireless

  
James Meza III

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**

2 **DIRECT TESTIMONY OF STAN L. GREER**

3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

4 **DOCKET NO. 010743-TP**

5 **OCTOBER 5, 2001**

6

7 **Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS AND**  
8 **YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS,**  
9 **INC. ("BELLSOUTH").**

10

11 A. My name is Stan L. Greer. My business address is 150 South Monroe  
12 Street, Tallahassee, Florida. I currently am a Manager-Regulatory  
13 Relations.

14

15 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

16

17 A. I graduated from the University of Kentucky in 1986 with a B.S. degree  
18 in Electrical Engineering. In January 1987, I accepted a position with  
19 **the Florida Public Service Commission ("FPSC" or "Commission") as an**  
20 Engineer I in the Division of Communications. In December 1995, I  
21 became the Supervisor for the Division of Communication's Carrier  
22 Services Section. During my tenure with the Commission, I acted as  
23 the Chairman for the NARUC Subcommittee on Technology and  
24 coordinated numerous Commission proceedings that established the  
25 basis for many of the Commission's current policies associated with

1 certification, depreciation, alternative access vendors services,  
2 implementation of state and federal statutes associated with  
3 competition, and various numbering issues. One of my main  
4 responsibilities in the Division of Communications, as it relates to these  
5 proceedings, was to develop and make recommendations on state and  
6 federal numbering issues. In this capacity, I participated in the  
7 development and implementation of numerous area code relief  
8 proposals, acted as the Chairman of the Florida Number Portability  
9 Steering Committee, and participated as a NARUC representative on  
10 the North American Numbering Council during the transition of the  
11 numbering administrative duties.

12

13 In April of 1998, I accepted my current position with **BellSouth** as a  
14 Manager-Regulatory Relations. My main job responsibility in this  
15 position is to act as an interface between **BellSouth** and the Florida  
16 Public Service Commission on all issues before the Commission that  
17 involve or may affect **BellSouth** Telecommunications, Inc.

18

19 As part of my current responsibilities, I participated in the development  
20 of **BellSouth's** position on various numbering issues such as specific  
21 area code relief proposals, number pooling initiatives, and any other  
22 number related issues that could eventually come before the  
23 Commission.

24

25 Q. **HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC**

1           **SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE**  
2           **SUBJECT OF YOUR TESTIMONY?**

3

4 A.       Yes. I have filed testimony before the Florida Public Service  
5           Commission in Docket Nos. 990455-TL, 990456-TL, 990457-TL and  
6           990517-TL.

7

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

9

10 A.       The purpose of my testimony is to address all issues established for  
11           this proceeding. Specifically, as a member of the Telecommunications  
12           Industry in the state of Florida (“Industry”), **BellSouth** submits this  
13           testimony in support of the Industry Recommendation for NPA relief for  
14           the 407/321 NPA. Additionally, my testimony addresses the issues in  
15           this Docket associated with the Volusia County, Osteen area  
16           (“Osteen”).

17

18 **Q.       WHAT IS BELL SOUTH’S RECOMMENDATION FOR RELIEF OF THE**  
19           **407/321 NPA?**

20

21 A.       **BellSouth** agrees with the Industry Recommendation for area code  
22           relief for the 407/321 overlay resulting from the Industry Meeting held  
23           on April 3, 2001. The consensus agreement of the Industry was to  
24           implement another overlay and to move the remaining 321 NXXs in the  
25           407/321 overlay area to Brevard County.

1 Q. WHAT DIALING PATTERNS SHOULD THE COMMISSION  
2 IMPLEMENT FOR LOCAL, TOLL, EAS, AND ECS CALLS IF THE  
3 ADDITIONAL OVERLAY IS ADOPTED?

4

5 A. BellSouth believes that the Commission should implement the same  
6 dialing patterns it required in Order No. PSC-98-1761-FOF-TL, Docket  
7 No. 980671-TL. In that order, the Commission established the  
a following dialing patterns:

9

- 10 1. Local/Extended Area Service ("EAS") Within and Between Area  
11 Codes - 10 Digits
- 12 2. Extended Calling Service ("ECS") Without Interexchange Carrier  
13 ("IXC") Competition - 10 Digits
- 14 3. ECS With IXC Competition - 1+10 Digits
- 15 4. Toll - 1 +10 Digits

16

17 Q. WHEN SHOULD NPA RELIEF BE IMPLEMENTED?

18

19 A. BellSouth believes that the Commission should implement the  
20 additional overlay as soon as possible. The Commission should  
21 establish an implementation schedule that would provide carriers with  
22 at least 90 days after issuance of a final order in this proceeding to  
23 implement the new overlay within its operational support systems.  
24 BellSouth believes that implementation of the overlay as soon as  
25 possible will maximize the number of 321 NXX codes available, which

1 would extend the life of the 321 area code in Brevard County. Because  
2 an overlay has already been implemented in the Orlando area,  
3 **BellSouth** does not believe it is necessary for the Commission to  
4 establish a permissive dialing period.

5

6 Q. **WHAT IS YOUR UNDERSTANDING OF VOLUSIA COUNTY'S**  
7 **PROPOSAL FOR THE OSTEEN AREA?**

8

9 A. It appears that Volusia County wants **BellSouth** to place a 386 NXX in  
10 its Sanford exchange, which would allow Osteen customers to migrate  
11 from their current 407 telephone numbers to the 386 NXX. However,  
12 under Volusia County's proposal, current Osteen customers that have a  
13 407 telephone number and who decided not to migrate to the 386 NXX,  
14 would only be able to receive a 386 telephone number if they  
15 requested additional numbering resources such as an additional line or  
16 fax line. Thus, under Volusia County's proposal, it is likely that some  
17 residents in Osteen could have multiple numbers with different area  
18 codes.

19

20 Q. **DOES BELLSOUTH SUPPORT VOLUSIA COUNTY'S PROPOSAL?**

21

22 A. While **BellSouth** will certainly abide by any order this Commission  
23 issues, **BellSouth** does not support the Volusia County proposal. The  
24 proposal creates numerous issues that this Commission will need to  
25 consider in deciding whether to implement such a plan.

1 **Q. WHAT SPECIFIC ISSUES WOULD VOLUSIA COUNTY'S**  
2 **PROPOSAL CREATE?**

3

4 A. First, the proposal sponsored by Volusia County does not allow  
5 customers in the Osteen area to receive additional 407 telephone  
6 numbers even if that customer wants a 407 number. As the  
7 Commission has seen in the previous Osteen ballots, the customers in  
a this area have expressed an interest to retain their current 407  
9 telephone numbers versus relinquishing their numbers and receiving  
10 various incentives in return, such as additional calling scope or  
11 exclusion from the 407/321 overlay. With the implementation of  
12 additional overlays throughout the state, it has become more apparent  
13 that customers, specifically business customers, prefer to retain a  
14 consistent numbering scheme. I have not seen anything that would  
15 make me believe the Osteen area would be any different.

16

17 Second, **BellSouth** believes that the implementation of the Volusia  
18 County proposal would create a dangerous precedent. The  
19 Commission is well aware of other areas that are in a similar situation  
20 or where citizens or municipalities simply do not like the outcome of a  
21 given area code boundary. **BellSouth** is concerned that if the  
22 Commission approves the Volusia County proposal, more areas  
23 bordering area code boundaries will petition the Commission for similar  
24 relief and the Commission would be hard pressed to distinguish Osteen  
25 from these other geographic areas.

1 Third, the requirement to place a 386 NXX in the Sanford exchange  
2 could raise a competitive concern among other carriers trying to get  
3 386 numbers to serve the Osteen area. Over the past few years, all  
4 efforts have been made to provide telecommunications carriers with the  
5 ability to have equal access to numbering resources. Among other  
6 things, adoption of the Volusia County proposal would make it more  
7 difficult for carriers to meet the FCC's requirements of having less than  
8 six (6) Months-to-Exhaust and at least 60% utilization before a carrier  
9 can receive additional numbering resources. If a carrier needs  
10 additional 386 numbers to provide service in the Osteen area, it would  
11 be required to meet the FCC requirements. If it could not meet said  
12 requirements, the carrier would either not be able to provide service or  
13 would have to petition the Commission for the requested numbers.  
14 Simply put, establishment of such an environment goes against what  
15 the entire Industry has been trying to implement over the past couple of  
16 years.

17  
18 Fourth, the specifics associated with the implementation of number  
19 pooling would have to be addressed prior to the Sanford exchange  
20 being placed in a pooling arrangement. As the Commission is aware,  
21 pooling is established on an exchange basis. **BellSouth** believes that  
22 additional criteria would be necessary when pooling is implemented in  
23 the Sanford exchange due to the implementation of the Volusia County  
24 proposal. Since Osteen is not a separate exchange, the 386 numbers  
25 designated for the Osteen area will need to be placed in a special pool,

1           which currently is not addressed by the Industry Numbering Committee  
2           (INC) Thousand-Block Number (NXX-X) Pooling Administration  
3           Guidelines. If such a mechanism is not established, the 386 numbers  
4           reserved for the Osteen customers could be used in other parts of the  
5           Sanford exchange. Such assignments would jeopardize future efforts  
6           to transition the Osteen area into the Volusia County area code.

7  
8           Fifth, the implementation of the Volusia proposal would not provide any  
9           significant advantage for the Osteen customers. The Osteen  
10          customers would continue to be required to dial 1 O-digits for all local  
11          calls, would continue to dial 1+10 digit ECS to Orange City, and would  
12          be prohibited from receiving additional 407 numbers. The only  
13          potential benefit from the Volusia proposal for the Osteen customers  
14          would be the ability to get a number in the Volusia County area code,  
15          which the customers in Osteen have already voted against twice.

16  
17          Sixth, the implementation of the Volusia plan would negatively impact  
18          the ability of **BellSouth** to receive additional numbering resources for  
19          the Sanford exchange. As the Commission is aware, **BellSouth** has  
20          had significant difficulty in getting additional numbering resources to  
21          serve its customers in multiple exchanges throughout Florida. The  
22          assignment of the 386 NXX in the Sanford exchange would place  
23          telephone numbers in that exchange's month-to-exhaust and utilization  
24          calculations that could prohibit **BellSouth** from receiving additional  
25          numbering resources to meet customer demand.

1 Seventh, the implementation of the Volusia County proposal would  
2 create an administrative burden on **BellSouth** and other carriers by  
3 requiring them to continue to track and address network and  
4 operational issues that may affect the customers in the Osteen area  
5 due to the unique circumstances of the Volusia County proposal,  
6 including implementing pooling, requesting additional numbering  
7 resources, handling translations and implementing network trunking  
8 provisions such as 911

9  
10 Eighth, it is questionable whether the Commission has the authority to  
11 require a telecommunications carrier to implement such a plan.  
12 Although I am not a lawyer, I understand that the FCC has exclusive  
13 jurisdiction over numbering issues but that the FCC can delegate  
14 certain authority to the states. At this point, the FCC has only  
15 delegated limited authority to the Florida Public Service Commission:  
16 (1) pursuant to the FCC's Local Competition Report and Order, FCC  
17 98-224, the Commission has the authority to create new area codes  
18 through the use of geographic splits, area code boundary realignment,  
19 **or an overlay; and (2) pursuant to FCC Order 99-249, the Commission**  
20 has the authority to implement certain numbering conservation  
21 measures. The Volusia County proposal does not appear to fit in  
22 either category as the placement of the 386 NXX in the Sanford  
23 exchange would not be for the creation of a new area code or to  
24 conserve numbers in the 386 area code. Consequently, a  
25 fundamental question exists as to whether the Commission has the

1 authority to implement the Volusia County proposal.

2

3 **Q. HAS BELLSOUTH ADDRESSED VOLUSIA COUNTY'S EFFORTS TO**  
4 **CONSOLIDATE THE OSTEEN AREA INTO A SINGLE VOLUSIA**  
5 **COUNTY AREA CODE IN THE PAST?**

6

7 A. Yes. BellSouth has on two occasions balloted the Osteen area  
8 customers to determine if the customers wanted to move into the  
9 Volusia County area code. (Depending on the timing of the ballot the  
10 new area code could have been 904 or 386)

11

12 **Q. WHAT WAS THE CRITERIA OF THE FIRST BALLOT?**

13

14 A. The first ballot was a result of a settlement offer approved by the  
15 Commission in Docket No. 981795-TL. Essentially, the proposal in the  
16 settlement created a new Osteen exchange and established EAS  
17 between the Osteen exchange and the Sprint Orange City exchange.  
18 Although the proposal required customers to take a number change  
19 and slightly increased their local calling rate, the proposal gave Osteen  
20 customers local calling to the Orange City exchange while exempting  
21 the Osteen area from the 407/321 overlay. This proposal moved the  
22 Osteen area into the Volusia area code (904) and established local  
23 calling within the Deltona City Limits.

24

25 **Q. WHAT WAS THE RESULT OF THE FIRST BALLOT?**

1 A. In order for the proposal to pass, the Commission required that 50% of  
2 the ballots be returned and that a simple majority of the returned ballots  
3 vote in favor of the proposal. Approximately 30% of the ballots were  
4 returned and only 12.91% of the returned ballots voted in favor of the  
5 proposal. Therefore, the first ballot failed.

6

7 Q. **HOW MANY NOTICES WERE SENT OUT TO THE CUSTOMERS ON**  
8 **THE FIRST BALLOT?**

9

10 A. Three separate letters were sent out to the Osteen customers in the  
11 first ballot. The first letter was approved by the Commission and sent  
12 by **BellSouth** with the ballot. Volusia County sent two separate letters  
13 to the Osteen customers soliciting support for the proposal.

14

15 Q. **WHAT WAS THE CRITERIA FOR THE SECOND BALLOT?**

16

17 A. In Docket No. 990517-TL, the Commission required **BellSouth** to once  
18 again ballot the Osteen customers to determine if they wanted to move  
19 **into the Volusia County area code (386)**. As a result of such a move,  
20 customers would have to change their telephone number and would be  
21 excluded from the 407/321 overlay.

22

23 Q. **WHAT WAS THE RESULT OF THE SECOND BALLOT?**

24

25 A. In order for the second ballot to pass, the Commission required that

1 only a simple majority (50% plus 1) of the returned ballots vote in favor  
2 of the proposal. As with the first ballot, the second ballot failed as well.  
3 Slightly more than 74% of the returned ballots voted against the  
4 proposal to move to the Volusia County area code.

5

6 Q. **CAN YOU SUMMARIZE YOUR TESTIMONY?**

7

a A. **BellSouth** supports the industry proposed relief for the 407/321 area  
9 codes. **BellSouth** believes that the Commission should implement the  
10 new area code as soon as possible to maximize the number of 321  
11 **NXXs** available for Brevard County. Implementation of the proposed  
12 area code relief would provide numbering resources for the 407/321  
13 overlay as well as for the 321 Brevard County area code.

14

15 As for Volusia County's proposal, **BellSouth** does not believe that the  
16 implementation of such a plan is appropriate. **BellSouth** believes the  
17 Commission should consider the issues listed above when evaluating  
18 whether or not to implement such a plan. Based on its initial review,  
19 **BellSouth** believes it is technically possible to implement such a plan.  
20 However, **BellSouth** has not done a detailed analysis of its systems to  
21 evaluate whether such a plan creates unforeseen problems.

22

23 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

24

25 A. Yes.