BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010743-TL

In the Matter of

PETITION FOR REVIEW OF PROPOSED NUMBERING PLAN RELIEF FOR THE 407/321 AREA CODES BY NEUSTAR, INC., AS NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR (NANPA), ON BEHALF OF FLORIDA TELECOMMUNICATIONS INDUSTRY.
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PROCEEDINGS:	HEARING
BEFORE:	COMMISSIONER J. TERRY DEASON COMMISSIONER MICHAEL A. PALECKI COMMISSIONER RUDOLPH "RUDY" BRADLEY
DATE:	Thursday, March 14, 2002
TIME:	Commenced at 9:30 a.m. Concluded at 10:46 a.m.
PLACE:	Betty Easley Conference Center Room 148 4075 Esplanade Way Tallahassee, Florida
REPORTED BY:	JANE FAUROT, RPR Chief, Office of Hearing Reporter Services FPSC Division of Commission Clerk and Administrative Services (850) 413-6732

APPEARANCES:

JAMES MEZA, III, SHARON LIEBMAN, ESQUIRE, 150 West Flagler Street, Suite 1910, Miami, Florida 33130, appearing on behalf of BellSouth Telecommunications, Inc.

SUSAN S. MASTERTON, Post Office Box 2214, Tallahassee, Florida 32316-2214, appearing on behalf of Sprint-Florida, Incorporated, Sprint Communications Company Limited Partnership and Sprint PCS.

PATRICK WIGGINS, Katz, Kutter, Haigler, Alderman, Bryant & Yon, 106 East College Avenue, Tallahassee, Florida 32301, appearing on behalf of Verizon Wireless.

FRANK GUMMEY, III, 123 West Indiana Avenue, DeLand, Florida 32720-4613, appearing on behalf of the County of Volusia and the City of Deltona.

C. LEE FORDHAM and ADAM TEITZMAN, FPSC Division of Legal Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, appearing on behalf of the Commission.

I N D E X

WITNESSES

EXHIBITS

NUMBER:		ID.	ADMTD.
1	TCF-1	11	26

CERTIFICATE OF REPORTER

P R O C E E D I N G S

COMMISSIONER DEASON: Call the hearing to order. Could I have the notice read, please.

MR. FORDHAM: Pursuant to notice published on February 15th, 2002, this time and place has been set for a hearing in Docket Number 010743-TL for the purpose as set forth in the notice.

COMMISSIONER DEASON: Thank you. Before we take appearances, let me just confirm that we have a telephone connection.

Mr. Gummey, you are on the line, is that correct?

MR. GUMMEY: That is correct, Commissioner.

COMMISSIONER DEASON: Okay. And you can hear me loud and clear?

MR. GUMMEY: Yes, sir.

COMMISSIONER DEASON: Very good. And with you are Ms. McFall and Mr. Weiss, is that correct?

MR. GUMMEY: That is correct, and the notary.

COMMISSIONER DEASON: Very good. We are going to proceed now by taking appearances.

Mr. Gummey, you might as well go ahead and give us your appearance to begin with.

MR. GUMMEY: Frank Gummey, Deputy County Attorney on behalf of the County of Volusia and the City of Deltona.

MR. MEZA: Jim Meza and Sharon Liebman on behalf of

BellSouth.

MS. MASTERTON: Susan Masterton on behalf of Sprint.

MR. WIGGINS: Patrick Wiggins on behalf of Verizon Wireless.

MS. MILLER: Kimberly Miller on behalf of NeuStar, Inc.

MR. FORDHAM: Lee Fordham and Adam Teitzman on behalf of the Commission.

COMMISSIONER DEASON: Very good.

Mr. Fordham, do we have any preliminary matters?

MR. FORDHAM: Commissioner, not specifically. I would like to state that we have some areas where there is no disagreement and we may be able to deal expeditiously with Issues 1, 2, and 3 in this docket. But there will be some minimal cross examination for a couple of the witnesses, but I think we can proceed in a very expeditious manner this morning.

COMMISSIONER DEASON: Very well. What we will do is we will go through the -- at least I would propose that we go through the normal list of witnesses, and when a witness takes the stand if that testimony can be stipulated, we will do that. Of course that is with the agreement of all of the parties, and have cross-examination waived. And then for those witnesses which we need to conduct cross-examination, we will do so. And I will leave it to the parties to advise me as to how they think we can proceed with each individual witness.

Mr. Fordham, do you have any other preliminary matters?

MR. FORDHAM: No, Commissioner.

COMMISSIONER DEASON: Do the parties have any preliminary matters?

Mr. Gummey, do you have anything preliminary in nature?

MR. GUMMEY: No, Commissioner.

COMMISSIONER DEASON: Very well.

MR. MEZA: Mr. Deason, I just wanted to bring to the Commission's attention that Ms. Liebman has not filed a notice of appearance on behalf of BellSouth prior to this morning, but she is a licensed attorney in the State of Florida and thus can represent BellSouth in this proceeding.

COMMISSIONER DEASON: Very well. Could I have the spelling of your name, please.

MS. LIEBMAN: Liebman, L-I-E-B, as in boy, M-A-N. The first name is Sharon, S-H-A-R-O-N.

COMMISSIONER DEASON: Thank you and welcome to the Commission. Any other preliminary matters? Hearing none, then I think that we can proceed. Let me at this point just mention one possibility and perhaps the parties need to give it consideration, give me some feedback. I understand in discussing matters with Mr. Fordham, and, in fact, Mr. Fordham may have already had some preliminary discussions with you,

there seems to be at least at this point the possibility that the Commission could address Issues 1, 2, and 3 in this proceeding today. And, of course, I have not discussed this with my colleagues, either, and of course it is dependent upon how comfortable they are with proceeding with those issues.

So at this point I just wanted to lay that out. If there are any objections to even considering that, if you can express them at this point then we will know that we don't even have to give it further consideration for today at least. But is there any objections, if the Commission is so inclined, to address Issues 1, 2, and 3 today? Mr. Meza?

MR. MEZA: BellSouth has no objection.

MS. MASTERTON: Sprint has no objection.

MR. WIGGINS: Verizon Wireless has no objection.

MS. MILLER: NeuStar has no objection.

COMMISSIONER DEASON: Mr. Gummey?

MR. GUMMEY: No objection from the County of Volusia or the City of Deltona.

COMMISSIONER DEASON: Very well. Commissioners, I just lay that out at this point. There is some concern that the remedy for the 321 area, that the more expeditious that we can make a decision the more effective that decision can be as it comes to conserving telephone numbers in the 321 area.

Mr. Fordham.

MR. FORDHAM: Commissioner, at the appropriate time

staff would be prepared to make a recommendation on those three issues.

COMMISSIONER DEASON: Very well. Well, anyway, we will proceed now with hearing from witnesses. All witnesses which are present in the room, I will ask that they stand and take the oath.

Mr. Gummey, have your witnesses already been subject to an oath, has that been administered, or how do you propose that we conduct that?

MR. GUMMEY: The notary has administered an oath to the witnesses, Commissioner, and she has prepared an affidavit as a notary indicating so.

COMMISSIONER DEASON: Very well. Well, then all the witnesses that are present here in the hearing room, please stand and raise your right hand.

(Witnesses sworn.)

COMMISSIONER DEASON: Thank you. I believe Mr. Foley is the first scheduled witness.

Is there any cross examination for Mr. Foley?

MR. MEZA: BellSouth has maybe two minutes worth of cross.

COMMISSIONER DEASON: Very well. Mr. Foley, please take the stand.

Ms. Miller, you may proceed.

MS. MILLER: Thank you.

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THOMAS C. FOLEY

was called as a witness on behalf of NeuStar, Inc., and, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MS. MILLER:

Q Mr. Foley, please introduce yourself for the record.

A Good morning. My name is Thomas C. Foley.

Q Please state your employer, business address and position.

A I work for NeuStar, Incorporated, as the North American Numbering Plan Administration. NeuStar's address is 1120 Vermont Avenue Northwest, Washington, D.C.

Q Have you been sworn in this morning?

A Yes, I have.

Q Did you cause to be prepared prefiled direct testimony consisting of seven pages and the attached Exhibit TCF-1, both of which were filed together with this Commission on October 4th, 2001?

A Yes, I did.

MS. MILLER: NeuStar requests that the prefiled direct testimony of Thomas C. Foley filed October 4th, 2001, be marked for identification.

COMMISSIONER DEASON: Well, the testimony we will insert into the record if there are no objections. Hearing no

objection, show the prefiled testimony inserted into the record. And we will need to identify the exhibits which are attached and we will --

BY MS. MILLER:

Q Mr. Foley, is your prefiled direct testimony a true and accurate copy of your testimony that you caused to be filed in this case?

A Yes, it is.

Q Do you have any changes or corrections to the testimony at this time?

A No, I don't.

Q And do you adopt your prefiled testimony as your testimony here today?

A Yes, I do.

MS. MILLER: The witness is available for cross examination.

COMMISSIONER DEASON: Let's identify the exhibits which are attached to the prefiled testimony. We'll identify those as Hearing Exhibit Number 1, and I believe the testimony has been inserted into the record, the prefiled testimony.

(Exhibit 1 marked for identification.)

QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Thomas C. Foley. My business address is NeuStar, Inc., 1120 Vermont Ave N.W., Suite 400, Washington, DC 20005

Q. With whom are you employed, and in what capacity?

A. I have been employed by NeuStar, Inc. ("NeuStar") as a Numbering Plan Area ("NPA") Relief Planner for the Eastern Region of the North American Numbering Plan since August 9, 1999. NeuStar is the North American Numbering Plan Administrator ("NANPA"). The NANPA and other numbering functions were transferred from Lockheed Martin IMS to NeuStar on November 30, 1999. As an NPA Relief Planner, I am a member of a group within NANPA that initiates NPA relief planning in NPAs within the Eastern Region of the United States in sufficient time to prevent the exhaust of numbering resources. My responsibilities include monitoring central office ("CO") code utilization trends and collecting other information in order to project NPA exhaust, notifying the industry and appropriate regulatory bodies of the need for NPA relief planning, and conducting relief planning meetings with the telecommunications industry. Once the industry has agreed to recommend a relief plan, I prepare and forward the industry's recommendations to the appropriate regulatory agency, then provide notification of agency approved relief plans to the industry in accordance with the NPA Code

Relief Planning & Notification Guidelines (INC 97-0404-016, July 2, 2001) ("NPA Relief Planning Guidelines").

Q. Please describe your educational background and professional experience in the telecommunications industry.

A. I have a Bachelors of Science Degree in Electrical Engineering from the University of Nebraska - Lincoln and a Masters of Business Administration from Roosevelt University in Chicago. I also have a Masters Certificate in Project Management from George Washington University. I have attended numerous telecommunications industry schools and forums on engineering, management, and project management.

I have been employed in the telecommunications industry for more than twenty-seven years. Prior to joining NANPA, I was employed by Sprint Corporation and its predecessor companies. During my employment with Sprint, I held positions in Engineering, Strategic Market Planning, Technology Planning, and Operations. In my most recent previous position with Sprint, I managed large complex interdepartmental projects such as NPA relief activities. I managed numbering related projects for Sprint from 1988 to 1999, including the implementation of interchangeable NPA and CO codes and local number portability.

I also teach mathematics, statistics, project management, and general management courses at both the undergraduate and graduate level at the University of Phoenix.

Q. Have you ever appeared as a witness before the Florida Public Service Commission ("Commission") before?

A. Yes. I appeared as a witness on behalf of NeuStar in numerous NPA relief proceedings.

PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. I offer this testimony to explain NANPA's role in the instant NPA relief proceeding pursuant to the NPA Relief Planning Guidelines.

NANPA's ROLE IN THE NPA RELIEF PROCESS

Q. Please describe NANPA's role in this proceeding.

A. The 2000 Central Office Code Utilization Survey and NPA Exhaust Analysis, May 19, 2000 Update ("2000 COCUS") projections for CO codes indicated that the 407/321 NPA (Central Florida) is expected to exhaust during the second quarter of 2004. To allow sufficient time to prepare for NPA relief to prevent exhaust in the 407/321NPA, NANPA notified industry members and the Commission on January 31, 2001 that NPA relief planning for the 407/321 NPA needed to be addressed.

On April 3, 2001, NANPA facilitated an industry meeting in Orlando, Florida to present NPA relief alternatives to the industry and to ultimately allow industry members to come to consensus on a relief plan to be presented to the Commission. A copy of the meeting minutes is attached as Exhibit A to Exhibit #1. Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to industry members an Initial Planning Document ("IPD") prior to the relief planning meeting. The IPD set forth three proposed relief alternatives. All three alternatives considered by the Industry were variations of an all services distributed overlay.

At the April 3, 2001 meeting, the industry extensively discussed the relief alternatives and reached consensus to recommend to the Commission Alternative #3, an all-services distributed overlay over the 407/321 area, as the preferred form of relief for the 407/321 NPA. The alternative includes a "freeze" of central office code assignments from the portion of the 321 NPA encompassing the 407 NPA. On May 15, 2001, NANPA filed a petition with the Commission on behalf of the industry requesting the Commission's approval of the industry's recommended relief plan.

Q. Who comprises the Industry to which you refer?

A. The Industry is comprised of those current and prospective telecommunications carriers operating in, or considering operations in, the 407/321 area code of Central Florida. The attendees of the April 3, 2001 meeting are listed in the Meeting Minutes, attached as Exhibit A, Attachment #1 to Exhibit #1.

Q. You referred to the "2000 COCUS" and indicated that relief was needed in the second quarter of 2004. Has NANPA revised this estimate?

A. Yes, the projection available at the time of the NPA Relief Meeting in April 2001 was for second quarter 2004. Subsequently, NANPA, as part of its business operations, published the 2001 NRUF and NPA Exhaust Analysis, the successor of the COCUS, on June 1, 2001. The revised exhaust date is now the first quarter 2004.

RELIEF ALTERNATIVES

Q. Please describe the alternative plans of relief set forth in the IPD and the projected lives of each.

A. In Alternative #1, an version of an all services distributed overlay, a new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. The portion of the 321 NPA covering Brevard County would not be affected. The projected life of Alternative #1 is 5 years. The 321 NPA covering Brevard County is projected to exhaust during the second quarter of 2005.

In Alternative #2, another version of an all services distributed overlay, a new NPA would be assigned to the same geographic area as the existing 407/321 NPA and the Brevard County portion of the 321 NPA. The projected exhaust of Alternative #2 is 4 years.

In Alternative #3, the third all services distributed overlay proposal, a new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. No more CO codes from the 321 NPA would be assigned to that area. The remainder of the CO codes in the 321 NPA would be reserved for use in the Brevard County area. The projected exhaust of Alternative #3 cannot be determined without knowing the date the assignment of 321 CO codes in the 407/321 NPA area will be frozen. However, a range may be provided. The projected lives of Alternative #3 are five years for the 407/321 NPA area and four to nine years for the Brevard County area, depending upon the implementation date.

Q. What do you mean by "depending upon the implementation date"?

A. The earlier that 321 NPA code assignments are frozen in the 407/321 NPA area, the more NXX codes will be available for use in the Brevard County area. This number is dependant upon when the implementation is ordered.

INDUSTRY CONSESUS

Q. Did the industry reach consensus on a relief implementation schedule to recommend to the Commission?

A. Yes. The industry agreed, by consensus, to recommend to the Commission Alternative #3.

Q. Did the industry reach consensus on a relief implementation schedule to recommend to the Commission?

A. Yes. Industry participants reached consensus to recommend to the Commission a schedule for NPA relief implementation. The industry recommends an installation interval of nine months, with first code activation in the new NPA no later than the beginning of the fourth quarter 2002. This Industry's recommended interval implementation schedule depends upon the Commission's adoption of Alternative #3.

Q. Does this conclude your testimony?

A. Yes, it does.

COMMISSIONER DEASON: BellSouth, if you have questions you may proceed.

MR. MEZA: Thank you.

CROSS EXAMINATION

BY MR. MEZA:

Q Mr. Foley, would you agree with me that approximately eight members of the industry voted on the various alternatives for the area code relief for 407/321?

A They reached consensus on a plan, yes.

Q And that is about eight companies?

A I believe that was the number.

Q Okay. And the consensus was to adopt Alternative Number 3, is that correct?

A Correct.

Q Are you familiar with Volusia County's proposal in this proceeding?

A Yes, I am.

Q And would you agree with me that what they are essentially asking is for BellSouth to drop a 386 code in the Sanford exchange?

A Yes.

Q And in effect that would give BellSouth approximately 10,000 numbers to serve Osteen customers?

A Correct.

Q With the 386 number?

A Yes.

Q Would you also agree with me that if the Commission were to order such a process that only BellSouth customers could obtain a 386 number in Osteen unless there was subpooling?

A No. They could request their own code for the 386 NPA.

Q Other carriers could?

A Other carriers could.

Q So if this Commission ordered BellSouth to drop a 386 code in the Osteen area in effect giving BellSouth 10,000 numbers, other carriers could take away from those 10,000 numbers, or would they have to go back to the Commission and to NeuStar and ask for an additional block?

A If number pooling is available in that area, they could take a block of numbers from that 386 NXX block that was given to BellSouth. If number pooling is not available in that area in the Sanford exchange, then that carrier would have to request its own block or its own full NXX code of 10,000 numbers.

Q Do you know if pooling is available in the Sanford exchange?

A I don't know.

Q Would you agree with me that pooling is essentially the pooling of numbers on an exchange level basis?

A Yes.

Q Would dropping a 386 code in the Sanford exchange for the Osteen area be considered pooling on an exchange level?

A Placing a full code in itself is not pooling, it is the ability to share those on the thousands block level would be pooling.

Q On an exchange level basis?

A On an exchange level basis, yes.

Q And Volusia County's proposal is not on an exchange level basis, would you agree with me?

A Correct.

Q Is NeuStar willing to implement subpooling?

A I don't think I can answer that question. I think if a proper order from the Commission were ordered, yes, we would.

COMMISSIONER DEASON: Let me ask, did you use the term subpooling?

MR. MEZA: Yes, sir.

COMMISSIONER DEASON: Could you get the witness to identify what that term means?

MR. MEZA: Yes, sir.

BY MR. MEZA:

Q Mr. Foley, can you gave me your understanding of what subpooling means?

A Would you provide pooling in an area less than a full exchange.

Q Such as?

A Such as what they call the Osteen area.

COMMISSIONER DEASON: Has that ever been done in other locales?

THE WITNESS: Not that I know of, sir.

BY MR. MEZA:

Q Do you know if this Commission has the authority to order subpooling?

A No, I do not.

Q If this Commission were to order BellSouth to drop a 386 code in the Sanford exchange, would that have any effect on extending the life of the 407 or 386 area codes?

A No, it would not because no codes would be returned to the inventory for reassignment anywhere else.

MR. MEZA: Thank you. I have no further questions.

COMMISSIONER DEASON: Questions?

MS. MASTERTON: Sprint has no questions.

MR. WIGGINS: Verizon Wireless has no questions.

COMMISSIONER DEASON: Mr. Gummey, do you have questions for Mr. Foley?

MR. GUMMEY: Yes, Commissioner.

CROSS EXAMINATION

BY MR. GUMMEY:

Q Mr. Foley, it would not make more numbers available you stated in 386 or 407, what about the new NPA?

A I'm not quite sure I understand your question. There is no new NPA that has been assigned yet, so no numbers have been assigned to it.

Q But in this docket it is contemplated that a new NPA will be assigned in the Seminole and Orange County area of 407 and possibly in the southwest Volusia area, correct?

A Yes.

Q If the new NPA numbers are not being assigned in southwest Volusia, would that make more of the new NPA numbers available in Seminole and Orange Counties?

A The new NPA NXX numbers or the exchange codes would be assigned to the Sanford exchange which includes the southern portion of Volusia County.

Q But if those numbers were not utilized in southwest Volusia, would they not then be more available, there would be more numbers available in the rest of the NPA area?

A Relief planning and code assignment is done on full NXX codes or blocks of 10,000 numbers and not on individual numbers. The fact that some were or weren't assigned in a particular area on an individual number basis we do not consider in our calculations because it is less than a full NXX code.

Q But, in fact, if they are not being used in Volusia, those numbers would be available elsewhere, wouldn't they?

A They would be available in the Sanford exchange.

MR. GUMMEY: Thank you. That's all the questions I have.

COMMISSIONER DEASON: Thank you. Staff.

MR. FORDHAM: Just a couple, Commissioner.

CROSS EXAMINATION

BY MR. FORDHAM:

Q Good morning, Mr. Foley.

A Good morning, sir.

Q On your direct testimony, Page 5, Lines 12 and 13 you stated that the projected exhaust date of the 407/321 area code is the first quarter of 2004. Can you tell us, please, have the code assignments been consistent with your projected estimates?

A The projected estimates that were made in April of last year have not been met by the actual growth.

Q And so which way would that have affected your assignments, have there been more or fewer assignments?

A The forecasted amount for growth per year in the central Florida area, Orange, Osceola, and Seminole Counties, was 147 codes. In the year 2001 they assigned 47 codes.

Q What would be the average per month right now, the average number of assignments per month?

A Over the last 12 months the average assignment has been 3.9 codes per month.

Q Have you had occasion to change the official

estimated exhaust date as a result of those deviations?

A No, we have not changed the exhaust projection at this time. It will be under review shortly with a new forecast being issued by the North American Numbering Plan administration in the May time frame of this year.

Q On Page 6, Lines 19 and 20 of your direct testimony, you stated that, "The earlier that 321 NPA code assignments are frozen in the 407/321 area the more NXX codes will be available for use in the Brevard County area."

Do you know, sir, the approximate number of available 321 area code NXXs that are presently available?

A Presently available there are 477.

Q Are you aware of any 321 NXXs in the Osteen area presently at this time?

A There are 321 NXXs assigned to the Sanford exchange. Whether they are being used in the Osteen area or not you will have to address that question to the individual carriers.

MR. FORDHAM: No further questions, Commissioner.

COMMISSIONER DEASON: Very well. Commissioners, any questions? Redirect?

MS. MILLER: No redirect. Thank you.

COMMISSIONER DEASON: Very well. Exhibits. You move admission of Exhibit 1?

MS. MILLER: Yes, we move for the admission, please.

COMMISSIONER DEASON: Very well. Without objection

show that Exhibit 1 is admitted.

(Exhibit 1 admitted into the record.)

COMMISSIONER DEASON: Thank you, Mr. Foley. BellSouth you may call your witness.

MR. MEZA: Thank you. We call Stan Greer, please.

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STAN GREER

was called as a witness on behalf of BellSouth Telecommunications and, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. MEZA:

Q Good morning, Mr. Greer.

A Good morning.

Q Can you give your name and address for the record, please?

A My name is Stan Greer, I work for BellSouth. My address is 150 South Monroe Street, Tallahassee, Florida.

Q And what is your position with BellSouth?

A I am a Manager of Regulatory Relations with BellSouth.

Q Have you caused to be filed 12 pages of direct testimony in this proceeding?

A Yes, I have.

Q Do you have any changes or modifications to that

testimony?

A No, I do not.

Q If I asked you the same questions today, would your answers be the same?

A Yes, they would.

MR. MEZA: Commissioner Deason, I move or ask that Mr. Greer's direct testimony be inserted into the record as if read.

COMMISSIONER DEASON: Without objection it shall be so inserted.

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF STAN L. GREER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010743-TP

OCTOBER 5, 2001

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

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

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

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

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

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

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

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

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

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

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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

Q. WHAT IS BELLSOUTH'S RECOMMENDATION FOR RELIEF OF THE 407/321 NPA?

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

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

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

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

Q. WHEN SHOULD NPA RELIEF BE IMPLEMENTED?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

authority to implement the Volusia County proposal.

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

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

Q. WHAT WAS THE CRITERIA OF THE FIRST BALLOT?

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

Q. WHAT WAS THE RESULT OF THE FIRST BALLOT?

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

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

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

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

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

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

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

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

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

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

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

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

A. Yes.

BY MR. MEZA:

Q Mr. Greer, do you have a summary of your testimony?

A Yes, I do.

Q Could you please provide it.

A Sure. Good morning, Commissioners. Essentially, there is two issues in this docket, the area code relief and then to address the Osteen issues. BellSouth supports the area code relief proposal that Mr. Foley has presented. However, unfortunately, the more controversial issue out of this proceeding is the Osteen issue. BellSouth has worked with Volusia County over the past few years in an attempt to get Volusia County where they want to be; one county, one area code.

BellSouth has offered EAS to consolidate Deltona. BellSouth has also attempted to minimize the number impacts of the given ballots that we have balloted over the past three or four years. All previous efforts have been rejected by the Osteen customers, however none of the efforts have created the concerns that Volusia's new proposal creates for BellSouth. BellSouth does not consider this a win-win situation.

Volusia County proposes that the Commission require BellSouth to essentially split the Sanford exchange and place a 386 NXX in Osteen so that the customers could migrate from 407 numbers to 386. Unfortunately, BellSouth does not support that proposal.

In my testimony I have identified eight issues that the Commission should consider when evaluating the Volusia County proposal. First, Volusia County's proposal requires Osteen customers to take 386 numbers. It is my understanding based on the service hearing in the Melbourne service hearing that Volusia modified that position. So that issue does not eliminate that concern.

Second, the Volusia County proposal BellSouth believes will set a dangerous precedent. There are others areas in the state that would be likely to come to this Commission and ask for a similar situation as putting a code into a given area so that they can look like a given area code, and receive service out of that area code. The ones that specifically come to mind is Barefoot Bay. The Commission has balloted that and it failed as well as Osteen did.

Third, the Volusia County proposal would create a competitive concern that, quite frankly, BellSouth wants no part of. Currently there are approximately 26 companies with 407/321 NXXs assigned in the Sanford exchange. This Commission is well aware of the various competitive issues associated with numbering and BellSouth has worked very hard to minimize any adverse impact as associated with its numbering efforts. I believe the Volusia County proposal creates a very real competitive concern for other carriers -- for BellSouth as well as other carriers since they will not be able to get 386 NXXs

to provide service to Osteen customers that they so desire.

Fourth, I believe the Commission would have to get NeuStar, as the plan administrator, to establish a subpool for the Osteen area. Currently the schedule for pooling in the Orlando MSA, which would encompass the Sanford exchange, is May 9th, I believe, of this year. The main issue I see with requiring NeuStar to set up a subpool is the lack of guidelines addressing assignment of codes in the subpool environment and whether this Commission can even order NeuStar to establish a subpool in the Orlando MSA.

Fifth, I don't believe the implementation of the Volusia proposal will provide any significant benefit for the Osteen customers. The customers will continue to have the same dialing patterns, the customers will continue to pay the same rates, and the customers will have to contend with multiple NPAs in an area.

Sixth, I believe the option of the Volusia proposal would adversely affect BellSouth's ability to get additional numbering resources for the Sanford exchange. As the Commission is well aware, the current FCC rules make it difficult to get additional numbering growth codes to provide service to customers. In fact, the last code request that I saw from the Sanford exchange would have been denied if we had had either an NXX or a thousand block in the Osteen area.

And, seventh, I believe the implementation of the

Volusia proposal would create an administrative burden on BellSouth as well as other companies by requiring special tracking functions associated with the day-to-day operations, such as translations, number assignments, pooling, trunking issues as far as 911 goes.

And last, unfortunately, BellSouth doesn't believe the Commission has the authority to require implementation of the Volusia County proposal.

That completes my summary.

MR. MEZA: Mr. Greer is now available for cross.

MS. MASTERTON: Sprint has no questions.

MR. WIGGINS: No questions.

MS. MILLER: NeuStar has no questions.

COMMISSIONER DEASON: Mr. Gummey.

MR. GUMMEY: Thank you, Commissioner.

CROSS EXAMINATION

BY MR. GUMMEY:

Q Mr. Greer, could you tell me how many lines BellSouth serves in the Volusia County area of 407?

A Basically, the last -- if I recall from the last ballot we had approximately 3,500 lines. 4,600 telephone numbers were effected.

Q 4,600?

A 4,600 telephone numbers, 3,600 lines, access lines. I'm sorry, customers. Excuse me.

Q Now, how long do you think a 10,000 block that was subpooled for your competitors, how long do you think that would last in the Osteen area?

A It would be dependent on the growth of the area. I do not have any projections. I am aware that in the service hearings the Volusia County folks have indicated that it is a growing area. Besides that, I don't have any numbers to give me an idea of what the growth pattern would be.

Q But it would, I guess, have to triple in service to exhaust that 10,000 block, wouldn't it?

A No, not necessarily. It would depend if a carrier wanted to a provide service, a facility-based type carrier wanted to provide service to an Osteen customer, it would handle essentially if it was subpooled ten carriers, each one getting a thousand block. So if there was ten carriers, it would go quickly. If there was only one for an extended period of time then, yes, it would last awhile.

MR. GUMMEY: That's all the questions I have.

COMMISSIONER DEASON: Staff.

MR. FORDHAM: Please, Commissioner.

CROSS EXAMINATION

BY MR. FORDHAM:

Q Mr. Greer, good morning.

A Good morning.

Q On Page 6, Lines 4 through 6 of your direct

testimony, you state that the proposal sponsored by Volusia County does not allow customers in the Osteen area to receive additional 407 telephone numbers even if that customer wants a 407 number.

On Page 23, Line 21 of 25 of the Viera, Florida customer hearing transcript, and Page 2, Lines 1 and 4 of his rebuttal testimony, Mr. Weiss indicates that if a 386 NPA code is made available for the residents of Osteen, the customers could still choose between the 407 and 386 area code for the new numbers. Does this in any way alleviate your concern that Osteen customers who presently have a 407 NPA number would not be able to receive another 407 NPA number if they so desired?

A Yes, this does. As I mentioned in my summary, Volusia County seemed to change a little bit what their position was as far as whether or not an existing customer could get additional 407 numbers, so, yes, it would.

Q Okay. And on Page 6, Lines 21 through 25 of your direct testimony you stated that if the Commission approves the Volusia County proposal more areas bordering area code boundaries will petition the Commission for similar relief. Can you tell us, please, what you believe some of the other area code boundaries and whether these are in the BellSouth territory?

A Yes. I mentioned Barefoot Bay was one that the Commission actually did ballot at the same time the Commission

balloted Osteen the first time. That area is in BellSouth's territory down in Brevard County. It is currently served out of St. Lucie County, which requires -- which has them in Brevard County which has 321 NPA, but those Barefoot Bay customers which are physically located in Brevard County have -- well, I guess now it would be the 772, the new code for the four northern counties of that area.

Q And on Page 7, Lines 1 through 15 of your direct testimony you state that placing a 386 NXX code in the Sanford exchange would raise a competitive concern among other carriers trying to get 386 area code numbers to serve the Osteen area. Would you support the same argument if a subpool for Osteen residents were in place in the Sanford exchange?

A Yes, I would. The reason why is because the criteria that they have to meet is no different. Now the chances of it not being able to meet the criteria would be lessened when you go down to getting a thousand block versus 10,000 because essentially the way that you get growth codes is you have got to meet a six months to exhaust criteria and have a certain utilization percentage.

If a company is close to that six month to exhaust or they go over that six months to exhaust and they go ask for a thousand block to serve the Osteen customers, then the number administrator will deny them the code. As the Commission is aware in various area code denials with BellSouth, that

unfortunately happens even though you have a customer that you need to serve.

Q Okay. On Page 8, Line 17 through 21 of your direct testimony you stated that the implementation of the Volusia County proposal would negatively affect the ability of BellSouth to receive additional numbering resources. Since the Sanford exchange will be in a pooling area shortly with thousand number blocks available, will there still be a negative impact on the availability to receive telephone numbers in the Sanford exchange? And, if so, could BellSouth's concerns be alleviated through the Commission's expedited process for code denials that we are now using?

A Let me approach that in a couple of ways. The first is, yes, BellSouth would still have problems getting codes even once we implement a subpool. Similar to other carriers, they have got to meet the months exhaust criteria. The second part of your question was would the Commission's expedited process help in that regard, the answer is yes, it would. However, there is a big delay between us getting a normal code, which is I think once we make a request and it is granted is two or three days versus us having to go through the appeal process which kicks it into the 30 or 45-day range from start to finish from the time we need to make the request to the time that we get an order and get it implemented.

COMMISSIONER DEASON: Let me ask a question at this

point. I'm trying to understand how does the Volusia proposal exacerbate the problem that already exists when it comes to receiving numbering resources from other areas that we have already addressed numerous times, how is this a special case?

THE WITNESS: Essentially what you are asking me to do is to put -- I already have 4,600 telephone numbers in the Osteen area. And what I'm having to do now is to put a block of codes, whether 1,000 or 10,000 into that Sanford exchange to provide service or to allow this migration to happen. That block could go -- I mean, if you look at the past ballots, could go very low utilization rate, whether it's 50, whether it's 100 that finally decide I will change my number to get a 386 code, although they don't get any substantial benefit for it as far as I'm concerned. That block will get added into our calculation for Sanford. We run pretty tight on six months to exhaust. As I said, the last one I saw for Sanford would have been denied and we would have had to go through the appeal process if I had had even just a thousand block due to the way the calculation is made.

COMMISSIONER DEASON: Thank you.

BY MR. FORDHAM:

Q Mr. Greer, this appears to be the first docket where we have had an extensive discussion of subpools, but in your opinion who would be responsible for administering a subpool?

A Being that it has never been done as far as I am

aware of, but I would expect that NeuStar, as the pooling administrator, would be the likely person to be the subpool administrator, if you will.

Q Do you also have an opinion on what entity might be responsible for any cost associated with a subpool?

A Well, I would expect that if it follows along the pooling guidelines there is typically duties that are required to happen that NeuStar has contracted I believe with the FCC to be the pooling administrator and then those costs are allocated, you know, there is an allocated charge back to carriers to cover a portion of those costs. So the individual carriers would be picking up a cost to do the pooling as they do today in all other pooling areas.

Q Okay. Are you aware of whether there have been subpools set up for 1-AESS switches in any of BellSouth's territories?

A There have been special -- I hate to say subpool, but I guess maybe it is a subpool for the 1-AESS switches. Essentially the way that proposal works is we donate to the normal pool, NeuStar holds those numbers and gives them back to us when we need them. But if another carrier needs those numbers, they give that carrier one of our blocks out of the 1-A. But it is not limited, the 1-A issue is not limited to a smaller than a rate center geographic area. It is essentially when they give a block to a carrier, they can use it in the

entire exchange, not as a subpart of that exchange, which is the difference between that and this.

Q Do you know whether the INC guidelines require the geographic NPA boundaries, do they follow the NPA boundaries, rate center boundaries?

A Yes. Typically, the assignment of codes are done on a rate center basis. You know, any carrier requesting or needing a number to provide service in Sanford, they would get assigned a code to the Sanford exchange. It is identified in the LERG that way, all carriers route that way, and so that is part of the issue of the special circumstance tracking issues that I talked about in my summary.

MR. FORDHAM: No additional questions.

COMMISSIONER DEASON: Commissioners, any questions? Redirect.

MR. MEZA: BellSouth has no redirect.

COMMISSIONER DEASON: And there was no exhibit. Very good. Thank you, Mr. Greer. Sprint.

MS. MASTERTON: Sprint calls Sandra Khazraee.

Thereupon,

SANDRA KHAZRAEE

was called as a witness on behalf of Sprint Telecommunications, and having been duly sworn, was examined as testified as follows:

DIRECT EXAMINATION

BY MS. MASTERTON:

Q Good morning, Ms. Khazraee.

A Good morning.

Q Could you please state your full name and address for the record?

A Sandra Khazraee, 1313 Blairstone Road, Tallahassee.

Q And by whom are you employed and in what capacity?

A I am employed by Sprint as a Manager in Regulatory Affairs.

Q Were you present and sworn in this morning?

A Yes.

Q Ms. Khazraee, did you cause to be filed five pages of direct testimony in this docket on October 5th, 2001?

A Yes, I did.

Q And do you have any changes or corrections to that testimony?

A No.

Q If you were asked those same questions today, would your answers be the same?

A Yes, they would.

MS. MASTERTON: Mr. Chairman, Sprint ask that Ms. Khazraee's direct testimony be inserted into the record as though read.

COMMISSIONER DEASON: Without objection it shall be so inserted.

Sprint-Florida, Incorporated
Docket No. 010743-TL
Filed: October 5, 2001

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

SANDRA A. KHAZRAEE

Q. Please state your name and business address.

A. My name is Sandra A. Khazraee. My business address is Sprint, 1313 Blair Stone Road, Tallahassee, Florida 32301.

Q. By whom are you employed, and what are your current responsibilities.

A. I am employed by Sprint United Management Corporation as Regulatory Manager. My current responsibilities include coordinating responses to FPSC data requests and interrogatories and ensuring compliance with all FPSC orders. I interface regularly with Sprint employees at all levels within the company to carry out my job responsibilities.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide and support Sprint's position

regarding the appropriate relief measures for the 407/321 NPA.

Q. What alternatives were considered by the industry as possible relief plans for 407/321?

A. Alternative 1 is an all-services distributed overlay alternative which would overlay a new area code over the same geographic area covered by the existing 407/321 NPAs. The 321 only NPA which covers Brevard County would remain as is. All existing customers would retain their area code and therefore would not have to undergo any telephone number change.

Alternative 2 was another all-services distributed overlay considered. In Alternative 2, the new NPA would be assigned to the entire geographic area covered by the existing 407/321 overlay plus the Brevard County portion of the 321 only NPA.

Alternative 3, another all-services distributed overlay proposed assigning a new NPA to the same geographic area as the 407/321 overlay. Within that overlay area, no additional 321 codes would be assigned. Rather, the remaining 321 codes would be reserved for future use within the Brevard County 321 area. All new codes required within the existing 407/321 overlay would be assigned from the new NPA.

Q. What method of area code relief plan should the Commission approve for the 407/321 area codes?

A. The industry agreed by consensus at a meeting held April 3, 2001 that

Alternative 3 would be the preferred form of relief in the 407/321 NPAs. Alternative 3 is the all-services distributed overlay which recommends that Brevard County maintain only the 321 NPA and which reserves the remaining unassigned 321 NXXs for Brevard County. Sprint was a participant at that meeting and is in agreement that Alternative 3 is the preferred alternative.

Q. Why does Sprint believe that Alternative 3 is the appropriate relief option for the 407/ 321 NPAs?

A. Alternative 3, which recommends a new overlay code over the same geographic area as the existing 407/321 overlay, was seen as the best alternative for several reasons. The customers within the existing 407/321 overlay have already been educated regarding an overlay and currently dial their local calls as 10-digit. Alternative 1 would not have provided any relief for Brevard County. Alternative 2, which had the lowest projected life, would have incorporated Brevard County into an overlay for the first time and the Brevard County customers would have to begin dialing all their local calls with 10-digits.

Q What should the dialing pattern be for the method of relief chosen for the following types of calls? Local, Toll, EAS, ECS

A. The industry agreed by consensus at the April 3 meeting that the existing dialing plan should be maintained. Within the overlay, all local calls and EAS calls must be dialed with ten digits. Toll calls must be dialed with one plus ten digits. ECS calls can either be dialed with one plus ten or ten digits depending on whether the customer wants the

call carried and billed by their intraLATA toll provider as a toll call or by Sprint – Florida as an ECS call.

Q. When should area code relief be implemented for the 407/321 area codes?

A. Relief should be implemented with activation of the new NPA by the beginning of the 4Q2002 assuming that there is a commission order before the end of the year, 2001.

Q. What type of mechanisms, not previously considered, if any, should the Commission approve to address Volusia County's area code and local dialing issues, and if so, when?

A. Sprint believes that the NPA relief docket would not be the appropriate place to consider Volusia County's area code and local dialing issues. These issues have been considered in previous dockets and customer balloting has not indicated a strong desire on the part of the customers for any solution which will require a number change. If new alternatives are to be considered, they should be considered in a separate docket.

Q. Pursuant to the Florida Statutes, FCC delegated authority, or both, does the Commission have the authority to require telecommunications carriers to place 386 numbers in their Sanford exchange to allow customers in the Osteen area to get new lines and migrate their existing services to the 386 numbers?

A. This issue is a legal issue and will be addressed fully in Sprint's brief.

Q. Does that conclude your testimony?

A. Yes, it does.

BY MS. MASTERTON:

Q Ms. Khazraee, have you prepared a summary of your testimony?

A Yes.

Q Would you please give that summary now?

A Yes. Good morning, Commissioners and Staff. Sprint supports the industry consensus that Alternative 3 is the preferred plan for the 407/321 NPA. That is the plan that puts the third overlay code over Osceola, Seminole, and Orange Counties, but allows Brevard County to retain only the 321 code. We preferred that alternative over Alternative 1 because Alternative 1 provides no relief for Brevard County. We preferred it over Alternative 2, because in Alternative 2 not only did it have the least life, it also required Brevard County to have an overlay and they recently took an area code change to avoid having an overlay. So we do support the industry consensus and we do believe that we can implement this in a much shorter time period.

That concludes my summary.

MS. MASTERTON: Ms. Khazraee is available for cross examination.

COMMISSIONER DEASON: Questions?

MS. LIEBMAN: Yes, BellSouth has several questions.

CROSS EXAMINATION

BY MS. LIEBMAN:

Q You stated in your testimony that area code relief should be implemented for the 407/321 area codes by the beginning of the fourth quarter of this year assuming that there was a Commission order before the end of 2001. Given that there was no order before the end of 2001, when do you suggest that the relief should be implemented?

A We would have preferred to have an order sooner, but it is not a problem that we did not. We need a bare minimum of three months to implement an overlay. Six months would be great. So in any case if we have an order soon, I believe we could still make the fourth quarter.

Q So you would agree with Stan Greer's proposal in his testimony that an implementation date of at least 90 days after issuance of a final order would be needed?

A Exactly, yes.

Q Does Sprint believe that this docket is the appropriate place to consider Volusia County's area code issues?

A No, we do not. We believe that this docket should be just an NPA relief docket. Whenever you introduce a controversial issue that is not related to NPA relief, you run the risk of holding up the NPA relief while the controversial issue is being resolved, so we believe it should have been in a separate docket.

Q And you heard Stan Greer's testimony. In it he

expressed several concerns regarding Volusia County's proposal. Does Sprint share these concerns?

A In this case because this has more of an effect on BellSouth than on Sprint, we didn't do a lot of work in our testimony on these issues, as you know. Some of the issues we believe are legal issues, jurisdictional issues. Those will be addressed in the briefs. But, yes, Sprint does support BellSouth's concerns particularly regarding number pooling and the subpooling and what may be entailed if we end up implementing what Volusia County has asked for.

Q And along those lines, I would like to focus on one particular concern that Stan mentioned, and that is the competitive concern. And I would like for you to consider this question from a Sprint ALEC perspective. If BellSouth were ordered to place a 386 NXX in the Sanford exchange for the Osteen area, Sprint, as an ALEC, wouldn't be in a position to offer a 386 code to its customers without a subpooling arrangement, isn't that correct?

A I believe that would be correct if only BellSouth implemented a 386 code in Osteen.

MS. LIEBMAN: Thank you. Nothing further.

COMMISSIONER DEASON: Mr. Wiggins.

MR. WIGGINS: No, sir.

COMMISSIONER DEASON: Ms. Miller.

MS. MILLER: No questions.

COMMISSIONER DEASON: Mr. Gummey.

MR. GUMMEY: Yes, if I could ask one question.

CROSS EXAMINATION

BY MR. GUMMEY:

Q How many lines does Sprint serve in the Volusia County/Osteen area presently?

A I apologize, Mr. Gummey, I did not bring that information with me and I do not know that off the top of my head.

MR. GUMMEY: Thank you.

COMMISSIONER DEASON: Any further questions, Mr. Gummey?

MR. GUMMEY: No, Commissioner.

COMMISSIONER DEASON: Very well. Staff.

MR. FORDHAM: No questions, Commissioner.

COMMISSIONER DEASON: Commissioners.

COMMISSIONER PALECKI: No questions.

COMMISSIONER DEASON: One follow-up question. While you still anticipate that you can make the fourth quarter implementation, I take it that the soon this Commission issues an order the easier that goal can be obtained?

THE WITNESS: Yes, Commissioner.

COMMISSIONER DEASON: Redirect.

MS. MASTERTON: No redirect.

COMMISSIONER DEASON: And we have no exhibits.

Thank you, Ms. Khazraee.

I believe the next scheduled witness is Volusia County, is that correct?

MR. GUMMEY: Yes, Commissioner.

COMMISSIONER DEASON: Okay. Mr. Gummey, you may proceed.

MR. GUMMEY: I would call Ann McFall.

COMMISSIONER DEASON: Just one second, Mr. Gummey. I think Mr. Meza had a question.

MR. MEZA: Yes, thank you. BellSouth, and I believe the rest of the parties here -- I haven't checked with NeuStar -- but would agree to stipulate the Volusia County witnesses. I don't have a problem if they want to provide a summary, but I don't intend to ask any cross examination questions.

COMMISSIONER DEASON: Let me inquire of the other parties. Is there any cross examination anticipated for the Volusia County witnesses, Staff?

MR. FORDHAM: Staff could also stipulate the testimony, Commissioner.

MS. MASTERTON: Sprint could agree to stipulate the testimony.

MR. WIGGINS: I would agree to stipulate. No cross.

MS. MILLER: NeuStar would agree, as well.

COMMISSIONER DEASON: Mr. Gummey, what has been

expressed here is that there is no cross-examination for your witnesses, so we will need to have the testimony become part of the record and to confirm that your witnesses have been sworn, which I think you have already indicated that you have done. And if your witnesses wish to provide a summary, well, then they will be given that opportunity, as well. So you may proceed with that understanding.

MR. GUMMEY: Thank you, Commissioner.

- - - - -

ANN McFALL

was called as a witness on behalf of VOLUSIA COUNTY and, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. GUMMEY:

Q Would you state your name and address, please.

A My name is Ann McFall, and I live at 1401 Clipper Terrace in Deltona, Florida.

Q Your prefiled testimony dated October 2, 2001, do you have any corrections to that testimony?

A There is one correction. I was elected chair of the Volusia County Council on January 10th of this year, so I am no longer vice chair.

Q Is that prefiled testimony a correct rendition of your testimony in this matter?

A Yes, it is.

MR. GUMMEY: I would offer the testimony into the record.

COMMISSIONER DEASON: Very well. Show that testimony inserted into the record.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

ANN MCFALL, COUNTY OF VOLUSIA

Q. State your name.

A. Ann McFall.

Q. State your position.

A. I am in my third consecutive term as the elected district member of the County Council, the governing body of the County of Volusia. I represent the entire area in the County where the telephone customers are assigned to the 407 area code. I am Vice Chair of the County Council. I previously served two four year terms as the elected school board member for the district which includes all the 407 area code customers. I also served on the Deltona Municipal Service District Advisory Board prior to the City of Deltona's incorporation.

Q. Describe the area presently served by the 407 area code.

A. It lies in the southwest corner of Volusia County and is commonly called the Osteen area. In fact, about one half the customers are in a section of the City of Deltona and the other one half in the unincorporated areas of Enterprise, Stone Island and Osteen.

Q. What is the position of the County of Volusia on assignment of an area code to Volusia County telephone customers?

A. The County government, as well as virtually every other governmental, commercial and civic organization taking a position, have strongly supported unifying the County into one area code. The Public Service Commission's action in the assignment of 386 to the previous 904 area of the County was a major step toward realization of that goal. The desire of the majority of 407 customers responding to the PSC survey to keep existing telephone numbers was respected by the PSC and the County. However, this docket provides for a new area code to be overlayed on 407 and would result in the County having 3 area codes. This result would be a step backward from the previous positive action of the PSC and is opposed by the County.

Q. Are there 407 customers who wish to switch to 386?

A. Yes. A majority of customers wished to keep their present phone number, because an area code switch would require completely new phone numbers because of duplicate NXX's. A number of customers are willing to get new telephone numbers in order to switch to the 386 area code. Customers such as the four public schools, which have dozens of lines but had only four votes in the PSC survey, have a present desire to switch because the vast majority of people who call the schools have 386 phone numbers. A change of telephone number would not affect any customer's scope of callilng.

Q. How can the goal of unifying Volusia County be best achieved?

A. By assigning the 386 area code to new lines in the Osteen area. This action would not only move toward the unified area code goal, but would also prevent the proliferation to 3 area codes by assignment of the new overlay area code. Second, existing customers who wish to switch to 386 should be permitted to do so.

Q. What benefits do you see accruing from unification?

A. There presently is considerable confusion among residents as to the location of customers with 407 area codes. Assigning the 386 area code as the overlay in Volusia County would facilitate reducing the confusion.

Q. Does this conclude your direct testimony?

A. Yes.

BY MR. GUMMEY:

Q And could you briefly summarize your testimony in this matter?

A Yes, and thank you. And thank you, Chairman Deason and members of the Commission. All I need to say in addition to what has already been provided, the County of Volusia and the City of Deltona respectfully request that the 386 NPA be overlaid in Volusia County.

MR. GUMMEY: No further questions.

COMMISSIONER DEASON: Very well. And there was no accompanying exhibit to the testimony, either. And there are no questions from any of the parties. Let me inquire, Commissioners, are there any questions of Chairman McFall?

COMMISSIONER PALECKI: No questions.

COMMISSIONER BRADLEY: No questions.

COMMISSIONER DEASON: Thank you, Chairman McFall, for being with us today. We have no questions for you.

MR. GUMMEY: If she could be excused, she needs to return and chair her council.

COMMISSIONER DEASON: Absolutely.

THE WITNESS: Thank you so much.

MR. GUMMEY: Commissioner, my next witness is Robert M. Weiss. If I could call him and ask him --

- - - - -

ROBERT M. WEISS

was called as a witness on behalf of VOLUSIA COUNTY and, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. GUMMEY:

Q You previously were placed under oath, is that correct?

A That is correct sir.

Q Would you state your name and address, please?

A My name is Robert M. Weiss. I live at 710 Bogene (phonetic) Circle in New Smyrna Beach, Florida.

Q You provided prefiled testimony in this matter dated October 24, 2001, is that correct?

A That is correct.

Q Do you have any additions or corrections to that testimony?

A The only correction that I have is in answer to my first question, I am now retired as the Director of Communications for Volusia County government. I am no longer active with the government.

Q Is that prefiled testimony an accurate reflection of your testimony in this matter?

A Yes, sir, it is.

MR. GUMMEY: I would offer it into evidence at this time.

COMMISSIONER DEASON: Without objection show that

testimony inserted into the record.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for review of proposed numbering relief plan for the 407/321 area code.	DOCKET NO.: 010743-TL Filed October 24, 2001

COUNTY OF VOLUSIA
REBUTTAL TESTIMONY OF
ROBERT M. WEISS

Q. Please state your name, organization, address, and title.

A. My name is Robert M. Weiss. I am the Communications Director for Volusia County government. My business address is 123 West Indiana Avenue, Room #205, DeLand, Florida 32720. The telephone number is (386) 736-5750.

Q. What is the purpose of your testimony?

A. To refute the direct testimony of Stan L. Greer, BellSouth Communications, Inc. at page 5, line 6 through page 12, line 21.

Q. What is your response to BellSouth's specific issues that it believes are raised by the proposal of Volusia County to overlay 386 NPAin the Osteen area of Volusia County?

A.1. The first issue concerns existing customers receiving additional lines with 407 telephone numbers. With the overlay proposed in this docket there is no guarantee

that those customers would receive a 407 number. If it is the policy of the Public Service Commission that existing customers wishing additional lines receive additional numbers with the same area code if available, Volusia County does not object to that procedure in the Osteen area. We have only the desire to associate 386 with as much of Volusia County as possible and more importantly we would hope that the city of Deltona, already divided telephonically between two NPA, three wire centers, and two local exchange carriers would not be further divided into a third NPA.

2. The second issue BellSouth raises is that the County proposal would create a "dangerous precedent". The technology by BellSouth's own admission is available to craft area code relief plans to improve upon existing conditions. Having a tiny corner of one county in a different area code and then compounding the problem by overlaying a third area code in the county does not make sense. If the public is better served by the solution proposed by the County, it is not a dangerous precedent but rather a fulfillment of this Commission's goal of public service.

3. The third point raised by BellSouth appears to be an altruistic effort to foster competition against its dominant position in the Osteen area by attempting to question whether other telecommunication carriers would have equal access to numbering resources. The nature of the Osteen area, which is predominantly rural and residential, makes BellSouth's desire to promote the interest of its competitors seem much like a red herring.

4. The County would agree with BellSouth that the number pooling arrangement should be addressed with additional criteria necessary to implement the overlay of 386 in the Osteen area.

5. There would be significant advantages to Osteen customers in obtaining the 386 overlay. Those receiving the new 386 numbers would have a geographical identity with Volusia County, and contrary to the statements of Mr. Greer, the customers have never had the opportunity to vote whether they wished to have 386 overlayed in their area as opposed to a new area code being overlayed in their area.

6. BellSouth fails to provide any concrete data showing that the 386 overlay in Osteen would prohibit BellSouth from receiving numbering resources needed to meet customer demand. The present lines (significantly less than 10,000) and the growth rate of Osteen make it questionable whether this area would significantly impact BellSouth's receipt of additional numbering resources in the Sanford exchange.

7. BellSouth has failed to quantify the burden placed upon it by the County's proposal so it is impossible to assess whether such burdens, in the era of sophisticated electronic resources is such that it would outweigh the benefits contained in the proposal.

8. Although I am not a lawyer, I wonder if BellSouth is estopped from raising a legal objection to the overlay of the 386 area code in the Osteen area because it failed

to raise objection twice before when this matter has been considered by the Public Service Commission.

Q. BellSouth addresses the issue of previous ballots in the Osteen area. Are these applicable to the present docket?

A. No. The two previous ballots asked customers where they wished to have their existing 10-digit telephone numbers completely changed. They voted no. They have never been asked whether they wished to have overlayed the 386 NPA as opposed to a different NPA overlay that is being established in this docket.

Q. Does this conclude your testimony?

A. Yes.

BY MR. GUMMEY:

Q Mr. Weiss, do you have a brief summary of your testimony?

A Yes, sir. Thank you for the opportunity and thank you, Commissioners. I'm enjoying one more opportunity to address you here. I believe that basically what I have tried to do is address the concerns that Mr. Greer raised in his direct testimony. We have tried to speak to those. I have tried to speak to those that I was qualified to speak to and not to those that are not in our expertise.

Our basic issue is that it just seems to make so much sense to us that of all the codes being discussed here that 386 has a longer longevity to it, and it seems to us that if we don't have to issue this new NPA code that this alternative envisions within Volusia County, if we can, in fact, restrict that overlay code to Orange, Osceola, and Seminole, that it makes sense in a numbers conservation matter. And also it would help Volusia County a great deal and the City of Deltona to just deal with two NPAs rather than three. I believe that is a good summary of my testimony.

MR. GUMMEY: That concludes his testimony, Commissioner.

COMMISSIONER DEASON: Thank you, Mr. Weiss. I believe the parties have indicated there are no questions. I will inquire of Commissioners, any questions for Mr. Weiss?

COMMISSIONER PALECKI: No questions.

COMMISSIONER DEASON: Mr. Weiss, I believe that there are no questions for you. Let me thank you again for joining us from your retirement and congratulate you again on your retirement.

THE WITNESS: Thank you, sir. It has been a pleasure.

COMMISSIONER DEASON: I believe Mr. Weiss was the last scheduled witness.

MR. MEZA: Chairman Deason, I have one point of inquiry, and that is I do not believe -- yes, I do not believe the service hearing transcripts have been moved into the record. Are they already part of the record or should we move them as an exhibit?

COMMISSIONER DEASON: I believe those transcripts are already a part of the record, but I will ask Mr. Fordham to indicate.

MR. FORDHAM: That is correct, Commissioner, they were entered already.

MR. MEZA: Thank you.

COMMISSIONER DEASON: Let me at this point -- we have concluded. All witnesses have been heard. Let me inquire of Staff. Do you feel it is appropriate at this time to make a recommendation on Issues 1, 2, and 3?

MR. FORDHAM: Commissioner, I would suggest that we

go through those and give the staff recommendation and see if there would be any objections to them. If not, then it would be good to go ahead and dispose of those issues. That would expedite the remainder of the docket.

COMMISSIONER DEASON: And I believe I inquired earlier that none of the parties have a problem with the Commission, if we are so inclined, to address Issues 1, 2, and 3. Do you need a short recess to compile your recommendation?

MR. FORDHAM: Commissioner, we are ready to proceed and make it orally if that is acceptable to the Commission.

COMMISSIONER DEASON: Why don't we do this, go ahead and make your oral recommendation and then we will take a short recess and we will come back and then I will inquire of my fellow Commissioners if they need any additional time or how they wish to proceed. So you may proceed with your recommendation.

MR. FORDHAM: Thank you, Commissioner. Issue 1 is what method of area code relief plan should the Commission approve for the 407/321 area codes. Staff recommends that the Commission implement Alternative Number 3, the industry recommendation for area code relief for the 407/321 area code.

Issue Number 2 is what should the dialing pattern be for the method of relief chosen for the following types of calls: A, local calls; B, toll calls; C, EAS; and, D, ECS. Staff recommends that the Commission implement the existing

dialing pattern it required in Order Number PSC-98-1761-FOF-TL in Docket Number 980671-TL, which included, a, local and extended area code service within and between area codes, ten digits; extended calling service without interexchange carrier competition, ten digits; c, extended calling service with interexchange carrier competition, one plus ten digits; and, d, toll, one plus ten digits.

COMMISSIONER DEASON: And just for clarification, that is the same position as taken by BellSouth in the prehearing order, is that correct?

MR. FORDHAM: That is correct, Commissioner. In Issue 3, when should area code relief be implemented for the 407/321 area codes, staff recommends an implementation date of Monday, June 17th.

COMMISSIONER DEASON: Let me inquire of the parties of that implementation date before we give it further consideration. Let's take a recess at this point and I will ask the parties to -- the attorneys to consult with their experts, and I will inquire after the recess as to any concerns with the recommended implementation date. We will take ten minutes.

(Brief recess.)

COMMISSIONER DEASON: We will go back on the record. First of all, let me inquire. Have the parties had an opportunity to discuss the proposed implementation date

contained in staff's recommendation?

MR. FORDHAM: Commissioner, with one amendment, I think there is agreement. Staff would at this time amend its recommendation on Issue Number 3 and recommend the implementation date be Monday, July 15th.

COMMISSIONER DEASON: Monday, July 15th. Since it is going to be the companies actually implementing, I assume that there is -- this is a little unorthodox because we are in a staff recommendation at this phase, but just let me inquire.

Is there any objection to Staff's recommended implementation date?

MR. MEZA: BellSouth has no objection.

MS. MASTERTON: Sprint has no objection.

MR. WIGGINS: Verizon Wireless has no objection.

MS. MILLER: NeuStar has no objection.

COMMISSIONER DEASON: Mr. Gummey, any objection to that implementation date?

MR. GUMMEY: Commissioner, not an objection. As I understand this docket, the order would be coming out in June resolving the Osteen matter, so that would be prior to the implementation date.

COMMISSIONER DEASON: Yes. As we have heard in testimony today, there has to be an absolute minimum of 90 days, and optimally up to six months from the time an order is issued until implementation. And I think that we are trying to

expedite that as quickly as possible, but still be within a reasonable time period.

MR. GUMMEY: We are in agreement with that. We just would not want a new NPA being overlaid before the Osteen issue was -- in Osteen before the issue was resolved.

COMMISSIONER DEASON: Mr. Fordham, let me inquire. What is the anticipated schedule for any issues which remain in this case?

MR. FORDHAM: Commissioner, briefs would be due on April 15th, an ominous day. Briefs and something else due on April 15th. The agenda for the recommendation on the remaining issues would be May 21st, and the order would issue on June the 10th.

COMMISSIONER DEASON: Under this schedule there would be a Commission decision by May 21st?

MR. FORDHAM: There would be a decision hopefully on May 21st.

COMMISSIONER DEASON: Okay. Well, Commissioners, what we have at this point is Staff has made a recommendation on Issues 1, 2, and 3. They feel that we can address those if the Commission is comfortable in doing so, and we would have the parties brief Issues 4 and 5, and that would be brought back to us with a written recommendation with an anticipated decision date of May the 21st.

Commissioners, do I have motion or a suggestion as to

how we proceed?

COMMISSIONER PALECKI: Chairman Deason, I can move staff's recommendation on Issues 1 through 3.

COMMISSIONER DEASON: We have a motion. Is there a second?

COMMISSIONER BRADLEY: Second.

COMMISSIONER DEASON: Moved and seconded. All in favor say aye.

(Unanimous affirmative vote.)

COMMISSIONER DEASON: Show there is a unanimous vote on Issues 1, 2, and 3. And we will defer any ruling on Issues 4 and 5 and give the parties an opportunity to brief those issues.

Is there anything else to come before the Commission at this time?

Hearing nothing, this hearing is adjourned. And I wish to express my appreciation to the parties for their preparation for this case and the expeditious manner in which it has been handled. Thank you all.

(The hearing concluded at 10:46 a.m.)

STATE OF FLORIDA)

: CERTIFICATE OF REPORTER

COUNTY OF LEON)

I, JANE FAUROT, RPR, Chief, Office of Hearing Reporter Services, FPSC Division of Commission Clerk and Administrative Services, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED THIS 28TH DAY OF MARCH, 2002.

JANE FAUROT, RPR
Chief, Office of Hearing Reporter Services
FPSC Division of Commission Clerk and
Administrative Services
(850) 413-6732

010743-TP

EXHIBIT #1

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. [redacted] EXHIBIT NO 1
COMPANY/ WITNESS: Foley
DATE: 3-19-02

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May 14, 2001

010743-TL

By Overnight Courier

Ms. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Petition for Approval of NPA Relief Plan for the 407/321 NPA

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies and an electronic copy on diskette of a petition of NeuStar, Inc., as the North American Numbering Plan Administrator and on behalf of the Florida Telecommunications industry. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Kimberly Wheeler
Counsel for NeuStar, Inc.
North American Numbering Plan
Administrator

Enclosures

dc-262631

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06042 MAY 15 ō
FPSC-RECORDS/REPORTING

Before the
FLORIDA PUBLIC SERVICE COMMISSION
Tallahassee, Florida 32399-0850

In re: Request for Review of Proposed Numbering Plan Relief for the 407/321 Area Codes	Docket No. _____

PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE FLORIDA TELECOMMUNICATIONS INDUSTRY

NeuStar, Inc, in its role as the North American Numbering Plan Administrator ("NANPA") for Florida under the North American Numbering Plan and acting on behalf of the Florida telecommunications industry ("Industry"),[1] petitions the Florida Public Service Commission ("Commission")[2] for approval of the Industry's consensus decision to implement an all services distributed overlay relief plan for the 407/321 Numbering Plan Areas ("NPA").[3] The Industry submits its recommendation to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often

[1] The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the state of Florida.

[2] The Federal Communications Commission delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19 (1999).

[3] As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

referred to as "CO" or "NXX" codes) for the 407/321 NPAs would exhaust during the second quarter of 2004. In January 2001, NANPA reviewed the forecast and subsequently revised the exhaust date to the fourth quarter of 2003. In order to allow sufficient time for completion of the consensus plan prior to exhaust and to have sufficient 321 CO codes to increase the Brevard County allotment, the Industry requests that the Commission approve its recommended nine-month relief implementation schedule. In support of this Petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

In 1998, the Florida Commission issued an order requiring NANPA and the Industry to implement a split boundary extension concentrated overlay to relieve the 407 NPA.[4] The plan was implemented in two phases. During the first phase, the 321 NPA was overlaid upon the Orange, Osceola, and Seminole counties and parts of Volusia and Lake Counties. The first phase was completed during December 1999.[5] During the second phase, Brevard County was split from the 407 NPA and received the 321 NPA. As ordered by the Commission, 381 CO codes were reserved for use in the Brevard County area of the 321

[4] *See* Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Supplemental Order on Allocation of NXX Codes For 407 Area Code Relief Plan, Order No. PSC-99-0056-FOF-TL, Docket No. 980671-TL (Jan. 6, 1999). *See also* Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Notice of Proposed Agency Action Order Modifying 407 Area Code Relief Plan, Order No. PSC-99-0679-FOF-TL, Docket No. 980671-TL (Apr. 6, 1999).

[5] Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Order Modifying the Implementation Schedule For 407 Area Code Relief Plan, Order No. PSC-99-0384-FOF-TL, Docket No. 980671-TL (Feb. 23, 1999). *See also* Request for Review of Proposed Numbering Plan Relief for the 407 Area Code, Order Granting Limited Extension of Permissive Dialing in the 407 Area Code Relief Plan, Order No. PSC-99-2335-FOF-TL, Docket No. 980671-TL (Dec. 2, 1999).

NPA. The second phase was completed in October 2000. As a result, both the 407 and 321 NPAs serve the Orange, Osceola and Seminole counties and portions of Volusia and Lake Counties. Brevard County is served only by the 321 NPA.

The 2000 COCUS projections for CO code utilization indicated that the 407/321 NPA would exhaust during the second quarter of 2004.[6] In January 2001, NANPA reviewed the forecast and revised the exhaust date to fourth quarter 2003.[7] Based upon the projected exhaust date and pursuant to Industry guidelines,[8] NANPA notified the Commission and the Industry on January 31, 2001 that NPA relief needed to be addressed. NANPA facilitated an Industry meeting in Orlando, Florida on April 3, 2001, to review and discuss relief alternatives for the 407/321 NPA.[9] Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document ("IPD") prior to the relief planning meeting. The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of three relief alternatives.[10] The relief alternatives evaluated by Industry participants are as follows:

---

[6] 2000 COCUS and NPA Exhaust Analysis May 23, 2000 Update ("2000 COCUS"). The 2000 COCUS can be accessed on NANPA's web site at <http://www.nanpa.com>.

[7] *See* 2000 COCUS and NPA Exhaust Analysis Changes As of April 4, 2001 ("2000 COCUS Update"). The 2000 COCUS Update can be accessed on NANPA's web site at <http://www.nanpa.com>.

[8] To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 13, 2000) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

[9] Attached as Exhibit A is a copy of the April 3, 2001 relief planning meeting minutes.

[10] A copy of the IPD is attached as Attachment #5 to Exhibit A.

- Alternative #1 – An All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. The 321 only NPA covering Brevard County would not be affected. The projected life of Alternative #1 is 5 years. The 321 NPA covering Brevard County is projected to exhaust during the second quarter of 2005.
- Alternative #2 – An All Services Distributed Overlay: A new NPA would be assigned to the same geographic area as the existing 407/321 NPA and the Brevard County portion of the 321 NPA. The projected exhaust of Alternative #2 is 4 years.
- Alternative #3 – An All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 407/321 NPA. No more CO codes from the 321 NPA would be assigned to that area. The remainder of the CO codes in the 321 NPA would be reserved for use in the Brevard County area. The projected exhaust of Alternative #3 cannot be determined without knowing the date the assignment of 321 CO codes in the 407/321 NPA area will be frozen. However, a range may be provided. The projected lives of Alternative #3 are five years for Area A and four to nine years for Area B, depending upon the implementation date.

At the meeting, the participants discussed the attributes of the various alternatives and reached consensus to recommend Alternative #3, an all services distributed overlay over the 407/321 area. The Industry eliminated from consideration Alternative #1 because the plan provided no relief for Brevard County. The Industry also rejected Alternative #2 because it had the lowest projected life and it would require customers in Brevard County to dial ten digits for local calls.

II. DESCRIPTION OF THE PROPOSED RELIEF PLANS FOR THE 407/321 NPA

The recommended all services distributed overlay alternative for the 407/321 NPA would overlay a new area code over the same geographic area covered by the existing 407/ 321 NPA. No more CO codes from the 321 NPA would be assigned to that area. The remainder of the CO codes in the 321 NPA would be reserved for use in the Brevard County area. All existing customers in the 407/321 NPA and Brevard County would retain their current ten-digit telephone numbers. In agreement with Federal Communications Commission regulations, customers located within the 407/321 overlay area would maintain ten-digit local dialing both within and across boundaries of the existing NPAs and the new relief NPA.[11] Only codes in the new overlay NPA will be assigned after the effective date of the new NPA. The projected lives of Alternative #3 are five years for Area A and four to nine years for Area B, depending upon the implementation date.

The Industry recommends that the Commission adopt the Industry's recommended nine month implementation schedule with the activation of the first code in the new relief NPA occurring no later than the end of the third quarter of 2002. The schedule, provided below, includes recommended implementation intervals for each implementation phase. The recommended nine month schedule is dependent upon the Commission's adoption of the Industry's recommended relief plan and that the 407 NPA will exhaust during the fourth quarter of 2002.

[11] 47 C.F.R. § 52.19(c)(3)(ii).

EVENT	TIME INTERVALS IN MONTHS
First New Code in the New Relief NPA is Activated and Assignment of CO Codes in the 321 NPA are Frozen	X (No later than the beginning of the fourth quarter 2002)
Complete Network Preparation	X-1
Begin Network Preparation	X-7
Commission Order	X-9

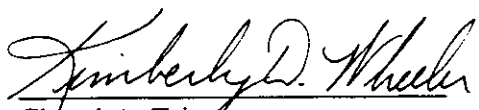
Adhering to the proposed timeframe will help avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 407/321 NPA in Florida to prevent the exhaust of numbering resources. The Industry requests that the Commission approve the Industry's recommended all services distributed relief plan and

implementation schedule for the 407/321 NPA. The Industry will begin implementing NPA relief once the Commission has issued a final order approving the instant petition.

Respectfully submitted,



Cheryl A. Tritt
Kimberly D. Wheeler

MORRISON & FOERSTER LLP
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Counsel for NeuStar, Inc.
North American Numbering Plan Administrator

May 14, 2001

EXHIBIT A

MINUTES TO THE APRIL 30, 2001 RELIEF PLANNING MEETING FOR THE 407/321 NPA (FLORIDA)

MEETING MINUTES OF FLORIDA
407/321 NPA RELIEF PLANNING INDUSTRY MEETING
TUESDAY, APRIL 3, 2001
Orlando, Florida

WELCOME AND INTRODUCTIONS

Thomas C. Foley, NeuStar NPA Relief Planner, introduced himself and Wayne Milby, Sr. NPA Relief Planner, and welcomed everyone to the 407/321 Relief Planning Meeting. He then asked the attendees to introduce themselves and identify the companies they represented. There were 18 participants at the meeting representing seven different entities (CLECs, ILECs, and Wireless). See Attachment #1 for the names of those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

NANPA'S ROLE AND RESPONSIBILITIES

Mr. Foley shared points regarding NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address: *www.atis.org/atis/nanp/nanpreq.htm.*

Mr. Foley provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. The list also included the web site addresses of Eastern Region NPA Relief Planning staff members and their contact information.

MINUTES AND STATEMENTS FOR THE RECORD

Tom reviewed the consensus process definition with the participants and emphasized silence was consensus. Tom indicated that minutes of the meeting would only include consensus agreements. He also explained that participants would have an opportunity to make statements for the record, if desired.

The meeting format was reviewed and participants were reminded that the meeting minutes serve as a basis of the filing of the recommended relief plan with the Florida Public Service Commission.

REVIEW OF INDUSTRY GUIDELINES/GENERAL ATTRIBUTES

Mr. Foley briefly reviewed the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Issued 1/27/99). This document can be obtained from the Internet at *www.atis.org/atis/clc/inc/incdocs.htm*. In addition, Mr. Foley described the ATIS consensus process and the consensus process described in the industry guidelines.

Mr. Foley reviewed a summary of General NPA Relief Attributes for NPA Splits and NPA Overlays. Refer to Attachment #3.

REVIEW CODE ASSIGNMENT HISTORY FOR 407/321
Mr. Foley reviewed the status of the 407/321 NPAs and NXX code assignment history. See Attachment # 4.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR 407/321
The April 2000 COCUS projected exhaust date is Second Quarter 2004 for the 407/321 NPAs. As a result of NANPA's January 2001 review of the 2000 COCUS the exhaust date was revised to Fourth Quarter 2003.

Mr. Foley reviewed the Initial Planning Document ("IPD") that was prepared and distributed prior to the meeting. See Attachment #5 for a revised copy of the IPD. The IPD proposed and described three relief alternatives for the 407/321 NPAs. The IPD contained detailed maps and the projected lives of each alternative.

Note: The original IPD included Alternatives #4 to #10. Those alternatives were subsequently withdrawn at the request of the originator and with the consensus of the participants on the call to approve the minutes.

ADDITIONAL ALTERNATIVES FROM INDUSTRY FOR 407/321
No additional alternatives were presented by the industry at the meeting.

ASSIGNMENT OF REMAINING 407 NXX CODES
The industry came to consensus that it was in the interest of the industry to first utilize the 407 NXX codes in the 321/407 area and that NANPA should query any applicant who request a 321 code to see if they would consider taking a 407 code.

Subsequent to the call to approve the minutes, NANPA indicated that they would, beginning June 1, 2001, notify applicants requesting 321 NXX codes of the availability of 407 NXX codes.

Also consensus reached to request NANPA send out a notice to the industry on DDS that 407 codes are available.

Statement for the Record from NANPA
NANPA will need to further investigate the industry request and report back to the industry on the call to approve the minutes of the 321/407 NPA relief meeting.

At the call to approve the minutes, NANPA indicated that they would announce the availability of 321 NPA codes via NANPA's Document Distribution System.

ELIMINATION OF ALTERNATIVES
Consensus was reached to eliminate the following alternatives for the reasons stated below each alternative:

Alternative #1 Overlay Over Existing 407/321 Area Only

- Does not provide relief for the Brevard County

Alternative #2 Overlay Over All 407/321 and 321 (Brevard County)

- Forces 10 digit dialing for Brevard County after they previously took an area code change to keep 7 digit dialing
- Least life of all alternatives

CONSENSUS ON A RELIEF ALTERNATIVE

Consensus was reached to recommend Alternative #3, a distributed overlay, to the Florida Public Service Commission as the relief plan for NPA 407/321. The date NPA 321 codes are to be frozen is the date the relief NPA is implemented.

Statement for the record from Sprint LTD
Sprint LTD opposes freezing assignment in 321 in the 407/321 overlay area, to allow existing 321 customers the flexibility of having additional 321 numbers.

CONSENSUS ON A DIALING PLAN

Consensus was reached to maintain the existing dialing plan.

CONSENSUS ON IMPLEMENTATION INTERVALS

Consensus was reached to recommend the Florida PSC allow a nine month implementation interval with the new code activation no later than the end of the 3Q2002. Please see Attachment #6.

INDUSTRY COMMITMENT FOR A TEST NUMBER

The participants reached consensus not to secure a commitment for a test number at this time but to wait until the Implementation Meeting.

CONSENSUS ON NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Industry participants reached consensus to have NANPA file, on behalf of the industry, the results of the industry efforts regarding the 407/321 NPAs relief in the form of a formal petition for relief with the Florida Public Service Commission. The NANPA will file the recommendation on May 15, 2001.

SET DATE FOR CONFERENCE CALL TO APPROVE MINUTES

Consensus was reached that the draft minutes and draft filing from this meeting will be distributed to the industry on or before May 1, 2001. Additionally, a conference call will be held on Tuesday May 8, 2001 at 2:00 p.m. ET to address open issues and to review and approve the draft filing and meeting minutes. The dial in number is (847) 619-6648; the access code is 6271827#.

On the May 8, 2001 conference call, the Industry, by consensus, approved the minutes as amended.

Attachment #1

MEETING MINUTES OF THE FLORIDA 407/321 NPA RELIEF PLANNING INDUSTRY MEETING

TUESDAY APRIL 3, 2001
Orlando, Florida

Attendees

David Campbell	Smart City Telecom
Bob Casey	FL PSC
John Craver	Sprint
Reva Flaherty	BellSouth Telecommunications
Thomas Foley	NeuStar, Inc., NANPA
Lee Gatzke	SBC Telecom
Barbara Green	Sprint
Stan Greer	BellSouth Communications
Anne Henderson	ATT
Levent Ileri	FL PSC
Jeannie Johnson	Sprint
Charles Lewis	BellSouth Telecommunications
Douglas A. McCullough	BellSouth Telecommunications
John McLaughlin	KMC Telecom
Wayne Milby	NeuStar, Inc., NANPA
Mark Parrish	BellSouth Telecommunications
Pamela Ringold	Sprint
Bill Sawyer	BellSouth Telecommunications
Dana Smith	Verizon Wireless
John Snyder	Sprint

Attachment #2

FLORIDA 321/407 NPA RELIEF

INDUSTRY MEETING
Tuesday April 3, 2001

Renaissance Orlando Resort
6677 Sea Harbor Drive
Orlando, FL 32821
(407) 351-5555

AGENDA

8:30	Registration
8:45	Welcome and Introductions
8:55	NANPA Role and Responsibilities
9:05	Minutes and "Statements For The Record"
9:15	Industry Guidelines/General Attributes
9:25	Review Code Assignment History
9:40	Review Initial Planning Document (IPD)
10:15	Break
10:30	Review Initial Planning Document (IPD)
11:00	Additional Alternatives from Industry
11:45	Lunch (On Your Own)
12:45	Elimination Of Alternatives
1:00	Consensus On Relief Alternative
2:15	Consensus on Dialing Plan
2:30	Break
2:45	Consensus on Implementation Intervals
3:15	Industry Commitment For Test Number
3:30	Consensus on NANPA Filing Industry Efforts With Commission
3:40	Statements For the Record
3:45	Set Date For Conference Call To Approve Minutes
3:55	Complete NANPA Survey
4:00	Adjourn

Attachment #3
General NPA Relief Alternative Attributes

Splits

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Implementation is generally understood.
- Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.
- Geographic splits permit 7-digit dialing within an area code.
- Stationery, business cards and advertising containing a ten-digit phone number will need to be revised by customers receiving the new area code.
- Future splits will reduce the geographic size of the area code.

Overlays

General Attributes of Overlays

- With an overlay there will be more than one area code in a geographic area. Where the overlay is a new concept some customer education is desirable.
- An overlay will not require existing customers to change their area code.
- An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls
- There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
- An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

General NPA Relief Alternative Attributes

Overlays

General Attributes of Concentrated Growth Overlays

- Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay, and it is difficult to predict the exhaust of the area outside of the concentrated overlay area.
- Normally, no existing customers will be required to change their telephone number.
- Customer confusion pertaining to dialing for a concentrated overlay could exist.
- A concentrated growth overlay minimizes implementation of 10-digit dialing for customers.
- Customer confusion pertaining to dialing for a concentrated overlay could exist.
- In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.

Attachment #4
407/321 NPA NXX Code Summary

NPA	407	321 OOS	321 Brevard
Assigned NXXs	555	165	184
Protected NXXs	15	0	0
Reserved NXXs	0	0	0
Unavailable NXXs (See Note)	34	19	0
Available NXXs	196	235	197
Total	800	419	381

Service Providers:	407	321
ILEC	4	3
CLEC	22	35
CAP	2	0
Interexchange Carrier	0	0
Wireless	21	12
Reseller	2	2

Codes assigned NPA 321	Jan-00	Feb-00	Mar-00	Apr-00	May-00	Jun-00
	6	13	15	31	13	12
	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00
	17	8	13	17	17	7
	Jan-01	Feb-01				
	17	1				
Codes assigned NPA 407	Jan-00	Feb-00	Mar-00	Apr-00	May-00	Jun-00
	0	0	0	0	0	1
	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00
	0	0	0	0	0	0
	Jan-01	Feb-01				
	4	1				

Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing cross NPA boundary).

Attachment #5

Initial Planning Document

For Relief of Florida 321/407 NPAs

April 2000 NEP Projected Exhaust Date 2Q2004
January 2001 Revised Exhaust Date 4Q2003

North American Numbering Plan Administration

Thomas C. Foley
NPA Relief Planner – Eastern Region

321/407 NPA Relief Alternatives

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR FLORIDA 407/321

COCUS DATE:	*April 1,2000*
Revised	*January 2001*
PROJECTED EXHAUST DATE:	*4th Quarter 2003*
AVERAGE ANNUAL CODE GROWTH:	*144*
AVERAGE MONTHLY NXX GROWTH:	*12*
LERG DATA:	*January 1, 2001*

Alternatives

Alternative # 1

Overlay Over Existing 407/321 Area Only

A new NPA code would be assigned to the same geographic area as the existing 321/407 NPA: Orange, Osceola, Seminole and part of Volusia Counties. Customers would retain their current telephone numbers; ten-digit local dialing by all customers between and within area codes in the area covered by the new code would continue. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 407/321 NPA all code assignments will be made in the new overlay area code.

Brevard County (321 NPA alone) would exhaust in 2Q2005 when its allotment of 381 NXX codes is consumed. No activity is included for this area with this alternative.

Codes at Relief in 321 NPA = 367*
Codes at Relief in 407 NPA = 748
Total Codes at Exhaust 1115
Area code life = 5 years

* This number is net of the 381 NXX codes from the 321 NPA held out for Brevard County.

321/407 NPA Relief Alternatives

Alternative # 2

Overlay Over All 407/321 and 321(Brevard County)

This Alternative would place a new NPA code over the entire 407/321 and 321 Areas: Brevard, Orange, Osceola, Seminole and part of Volusia Counties. Ten-digit dialing of local calls would be implemented in the areas where it does not currently exist. Codes in the new overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 407 and 321 NPAs all code assignments will be made in the new overlay area code. The entire area would now have a single exhaust date in the future. The Brevard area would have 321 and the new NPA(s) and the Orange, Osceola, Seminole, and part of Volusia Counties would have 407/321 and the New NPA(s); the 407 NPA would not be extended into the Brevard County area.

Total codes at Relief = 1496
Area code life in years = 4 with the introduction of one new NPA
8 with the introduction of two new NPAs

Alternative # 3

Freeze 321 NPA in Central Area

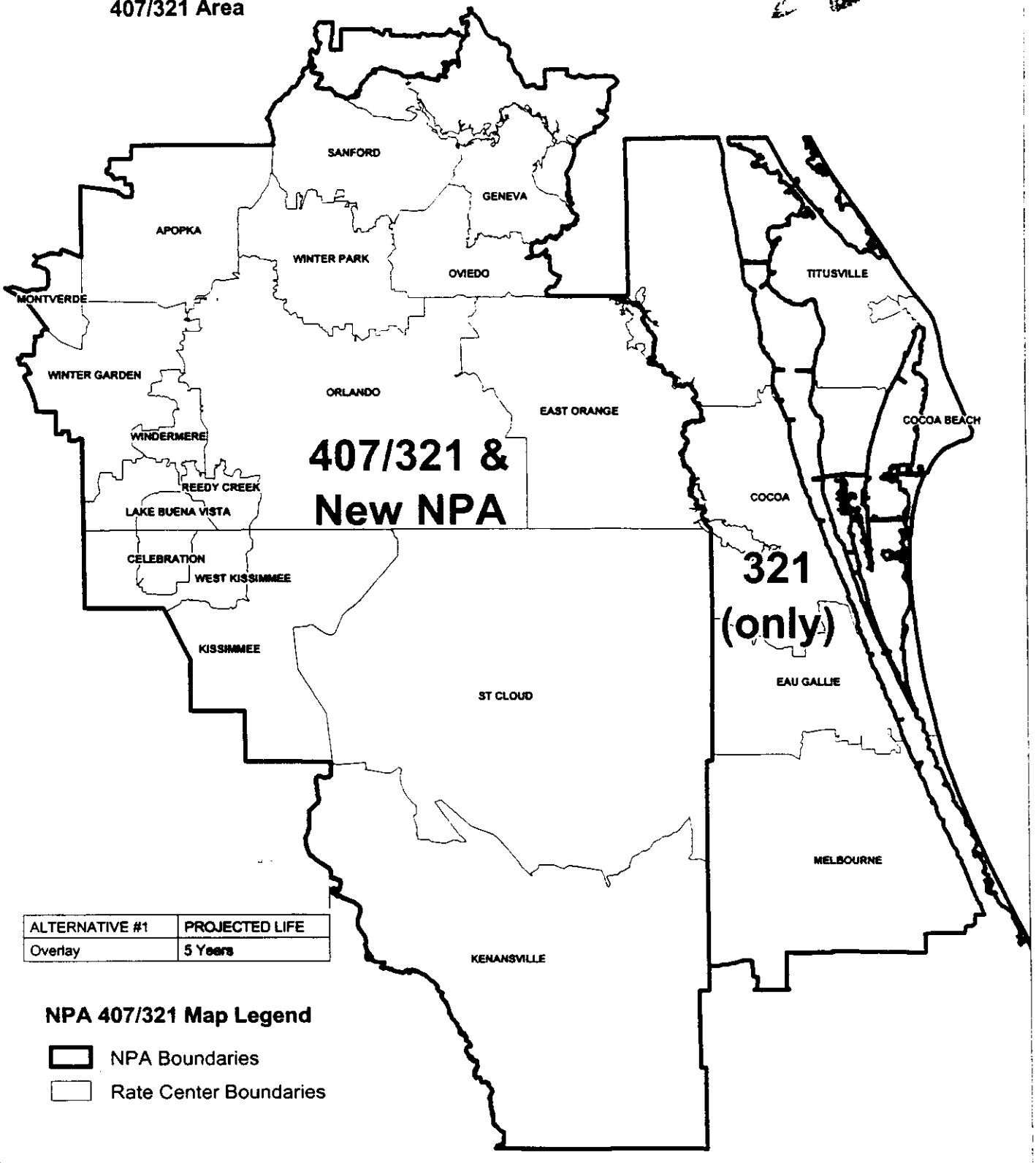
This Alternative would hold the growth of 321 NXX codes in Area "A" to the level at relief. The remainder 321 codes would be held for use in the Brevard County area. A new NPA code would be added to Area "A". Ten-digit local dialing by all customers between and within area codes in Area "A" would continue. Codes in the new overlay NPA will be assigned upon request with the effective date of the new area code. Codes in the 321 NPA in Area "A" will be "frozen".

Projecting the life of the areas is impossible without knowing the actual date of relief since the number of available NXX codes to be available to the Brevard County area (Area "B") is dependant on how many are used prior to the relief date. Relief must be provided earlier to assure sufficient codes to extend the life of the Brevard County portion of the NPA.

Codes at Relief in Area "A" = 1115 to 890
Codes at Relief in Area "B" = 431 to 175
Area code life Area "A" = 5 years
Area "B" = 4 to 9 years

Note: The original IPD included Alternatives #4 to #10. Those alternatives were subsequently withdrawn at the request of the originator and with the consensus of the participants on the call to approve the minutes.

NPA 407/321 Rate Center Map
Alternative #1
Overlay Over Existing
407/321 Area



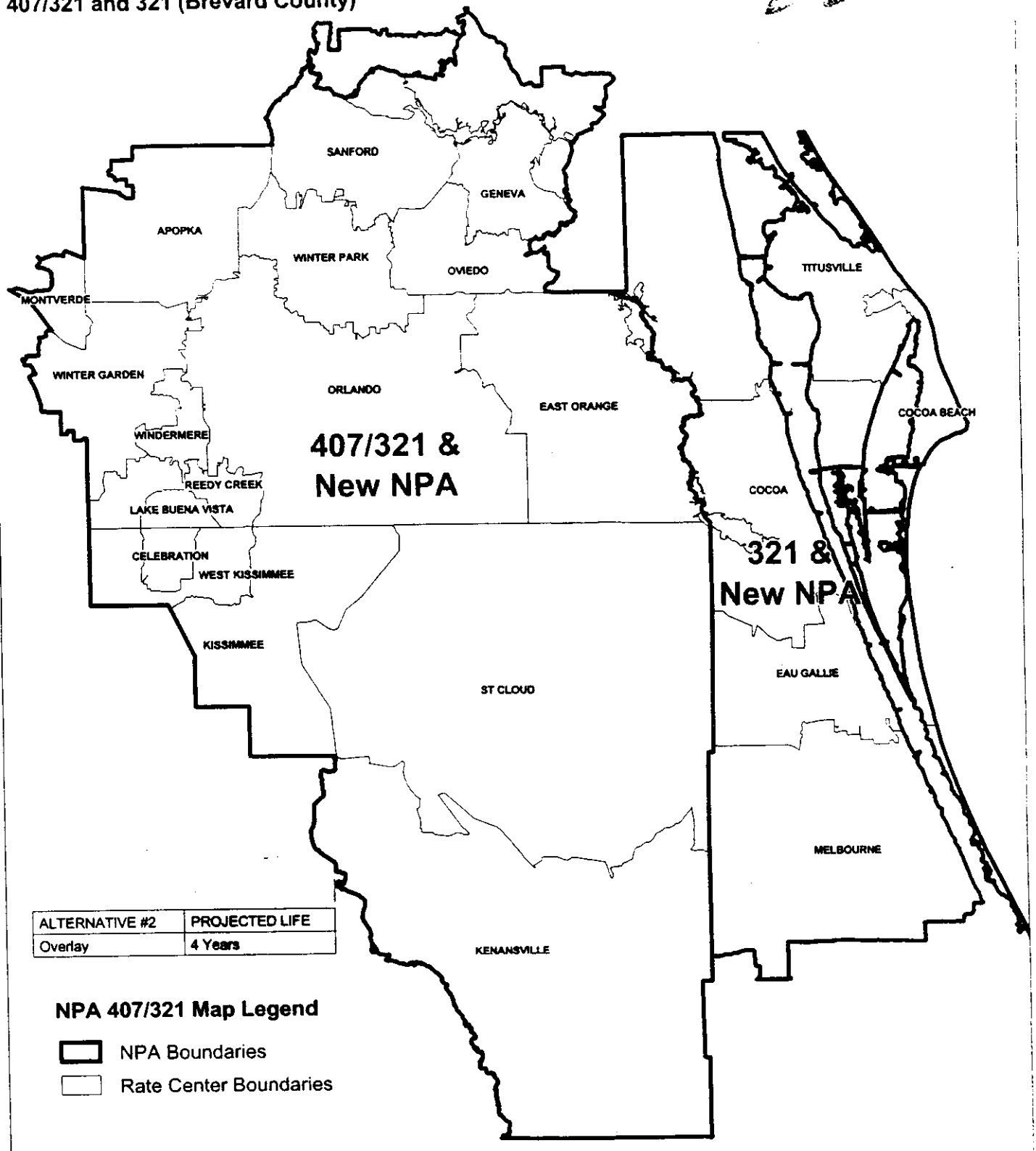
ALTERNATIVE #1	PROJECTED LIFE
Overlay	5 Years

NPA 407/321 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Produced by CDS Business Mapping 3/2/2001

NPA 407/321 Rate Center Map
Alternative #2
Overlay Over All
407/321 and 321 (Brevard County)



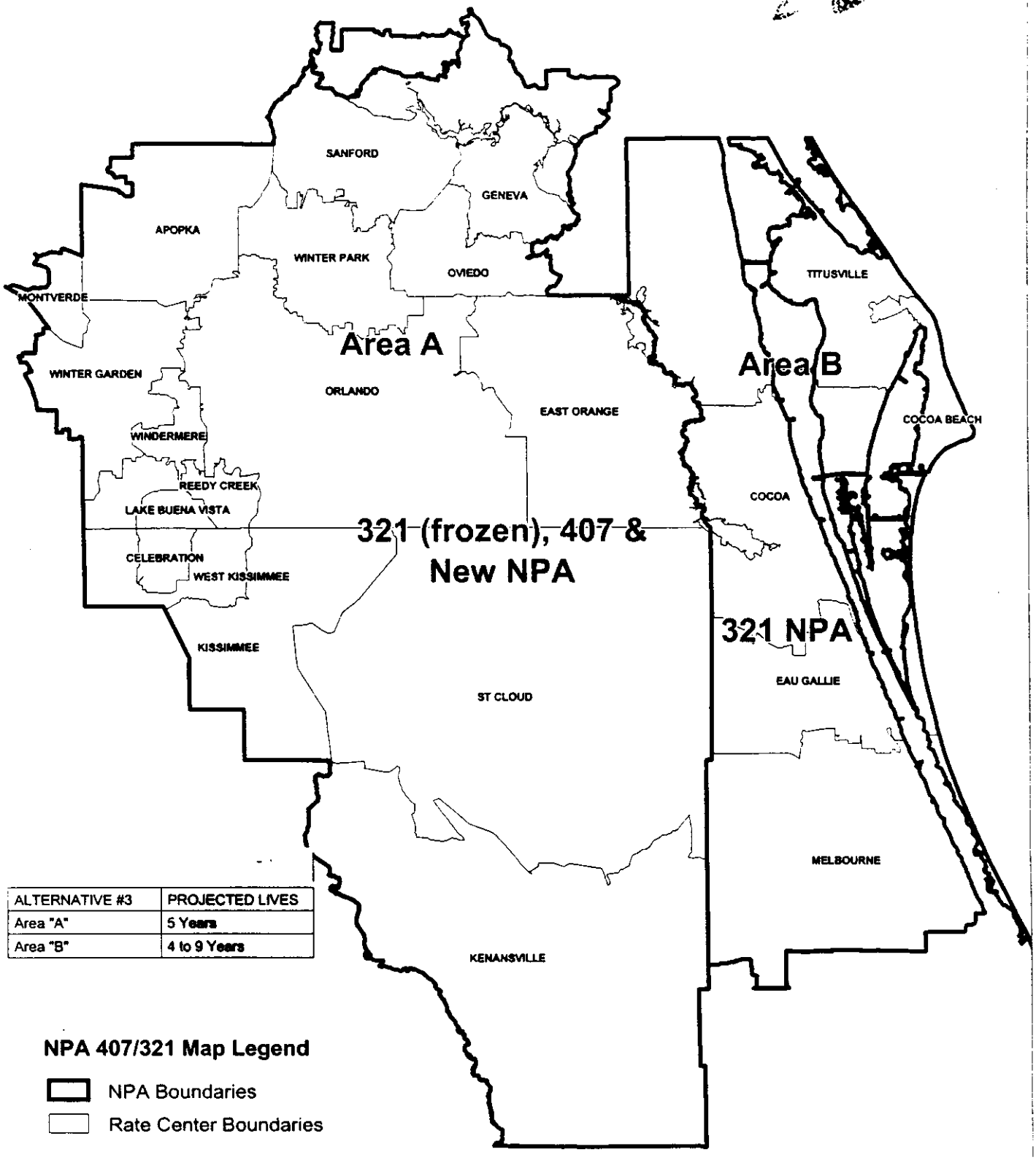
ALTERNATIVE #2	PROJECTED LIFE
Overlay	4 Years

NPA 407/321 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Produced by CDS Business Mapping 3/2/2001

NPA 407/321 Rate Center Map
Alternative #3
Freeze 321 NPA in Central Area



ALTERNATIVE #3	PROJECTED LIVES
Area "A"	5 Years
Area "B"	4 to 9 Years

NPA 407/321 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Produced by CDS Business Mapping 3/2/2001

FLORIDA 321 and 407 NPA ALTERNATIVES

PROJECTED LIVES OF RELIEF ALTERNATIVES

STANDARD LIVES

Alternative	Area A	Area B
#1		5
#2		4
#3	5	4 to 9

Attachment #6

Recommended Implementation Intervals

Florida 321/407 NPA Relief

Event	Time Interval (in Months)	Date Suggested
New Code Implemented (321 Freeze)	X	NLT 4Q2002 (Note 1)
Network preparation complete	X-1	
Begin Network Preparation	X-7	
Commission Order	X-9	

Notes: 1. This date assumes an NPA exhaust Fourth Quarter 2003 and represents the beginning of the period.