



DEPARTMENT OF MANAGEMENT  
**SERVICES**

4050 Esplanade Way • Tallahassee, Florida 32399-0950

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FILE COPY

LAWTON CHILES, GOVERNOR

WILLIAM H. LINDNER, SECRETARY

E-MAIL: mathues@dms.state.fl.us  
(904) 487-1082  
FAX: (904) 922-6312

November 1, 1996

Suite 260

**Blanca Bayo, Director**  
**Division of Records and Reporting**  
**Florida Public Service Commission**  
**2540 Shumard Oak Boulevard**  
**Tallahassee, Florida 32399-0850**

**Re: Docket No: 961153-TL**  
**904 Area Issues/BellSouth Telecommunications, Inc.**

Dear Ms. Bayo:

Enclosed for filing in the above docket are an original and 15 copies of the Department of Management Services' Glenn W. Mayne testimony, along with out attached certificate of service.

Sincerely,

*[Handwritten Signature]*  
**Stephen S. Mathues**  
**Assistant General Counsel**

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Enclosure

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FPSC SUPPLY OF FORMS



DOCUMENT NUMBER + DATE

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FPSC RECORDS/REPORTING

1 TESTIMONY OF GLENN W. MAYNE  
2 BEFORE THE  
3 FLORIDA PUBLIC SERVICE COMMISSION  
4 PETITION FOR NUMBERING PLAN  
5 AREA RELIEF FOR 904 AREA CODE  
6 BY BELLSOUTH TELECOMMUNICATIONS, INC.  
7 DOCKET NO. 961153-TL  
8

9 QUESTION: Please state your name and business address.

10 ANSWER: My name is Glenn W. Mayne. My business address is  
11 Department of Management Services, Division of  
12 Communications, 4050 Esplanade Way, Building 4030,  
13 Suite 260, Tallahassee, Florida 32399-0950.  
14

15 QUESTION: By whom are you employed, and what is your  
16 position?

17 ANSWER: I am employed by the Florida Department of  
18 Management Services, Division of Communications,  
19 as the Division Director.  
20

21 QUESTION: Please summarize your background with the  
22 Department of Management Services?

23 ANSWER: I have been Director for the Division of  
24 Communications since 1985 and participated in the  
25 design and implementation of the current SUNCOM



1 Network as a fully integrated digital network that  
2 carries voice, data, video, image and radio  
3 signals. SUNCOM provides communications services  
4 that link state agencies, universities, community  
5 colleges, county governments, municipalities, and  
6 libraries throughout Florida.  
7

8 **QUESTION:** Do you have statutory authority to present  
9 testimony on behalf of the State?

10 **ANSWER:** Section 282.102(21), Florida Statutes, outlines  
11 the powers and duties of the Division of  
12 Communications of the Department of Management  
13 Services. By statute the Division of  
14 Communications is charged with the responsibility  
15 of presenting testimony before the Florida Public  
16 Service Commission on behalf of state agencies on  
17 issues relating to the State's communications  
18 facilities and services.  
19

20 **QUESTION:** What is the purpose of your testimony?

21 **ANSWER:** The purpose of my testimony is to present the  
22 impact to state agencies if the 904 area code  
23 changes for the Tallahassee Market Area.  
24 Specifically, there are two issues I want to  
25 address: fiscal impact and community of interest

1                   considerations.

2

3   **QUESTION:** How do these issues affect state agencies?

4   **ANSWER:** The first issue, fiscal impact, will cause a  
5                   reallocation of tax dollars that otherwise would  
6                   be used to support ongoing programs and services.  
7                   More importantly, however, is the second issue,  
8                   community of interest considerations, and how a  
9                   904 area code change will interfere with the  
10                  ability of Florida's citizens and the general  
11                  public to communicate with Florida state  
12                  government in Tallahassee.

13

14   **QUESTION:** Explain how state agencies will be fiscally  
15                  impacted if the Tallahassee Market Area is removed  
16                  from the 904 area code.

17   **ANSWER:** If a new area code is assigned to the Tallahassee  
18                  Market Area, state agencies will incur expense not  
19                  only to reprogram private automatic branch  
20                  exchanges (PABXs), electronic key systems (EKS),  
21                  faxes, autodialers, etc. but also to reproduce and  
22                  redistribute public information. All these  
23                  expenses will take away from fixed revenue sources  
24                  for state agencies. State agencies do not have  
25                  opportunities to recover these costs through tax



1 deduction relief as a business expense, increased  
2 prices, or other means that may be available to  
3 the private sector.  
4

5 **QUESTION:** Please summarize the impact for reprogramming  
6 equipment.

7 **ANSWER:** The State has 340 PABXs and 1600 electronic key  
8 systems throughout Florida. A conservative cost  
9 estimate to reprogram this equipment's special  
10 functions and features (speed call long list,  
11 speed call short list, toll restriction, etc.) is  
12 estimated to be \$500,000. Ultimately, this figure  
13 could approach \$1,500,000, depending upon the  
14 status of software configurations that provide the  
15 North American Numbering Plan dialing scheme. In  
16 addition, there are 176 consolidated systems  
17 (ESSX, CentraNet, Centrex) serving some 128,000  
18 stations that will have to be reviewed with  
19 similar changes being made to the speed call lists  
20 and special routing features. It is estimated  
21 that this cost will be an additional \$160,000.  
22

23 **QUESTION:** What other fiscal impact could a change in the 904  
24 area code in the Tallahassee Market Area have on  
25 state agencies?

1    **ANSWER:**    There will also be costs for reprinting and  
2                    redistributing public information by state  
3                    agencies. To illustrate potential fiscal impact,  
4                    I have a letter from the Division of Retirement  
5                    estimating \$200,000 to republish and redistribute  
6                    retirement publications. (Exhibit No. GWM-1) I  
7                    also have a letter from the office of the  
8                    Secretary of State estimating a cost impact of  
9                    \$60,000 to \$75,000. (Exhibit No. GWM-2) The  
10                   Department of Business and Professional Regulation  
11                   estimates costs at \$25,000 to reprint existing  
12                   forms and \$15,000 to make programming changes.  
13                   (Exhibit No. GWM-3) Given estimates for these  
14                   agencies, I can extrapolate among all agencies and  
15                   arrive at an overall estimated impact figure of  
16                   \$2,480,000.

17  
18    **QUESTION:** You mentioned the community of interest  
19                   consideration as the major issue to state  
20                   agencies. Explain this concept.

21    **ANSWER:**    As the location for Florida's capital and state  
22                   government, the Tallahassee Market Area holds a  
23                   community of interest for 14 million Florida  
24                   citizens and the general public. There are  
25                   numerous state agencies that provide consumer



1 assistance in dealing with complaints, licenses,  
2 registrations, permits, taxes, etc. The  
3 Tallahassee Market Area is unique in that incoming  
4 call volumes are high. On a typical business day,  
5 the call volume into state government exceeds  
6 600,000 calls per day, which equates to 12 million  
7 calls per month. It is the great community of  
8 interest demonstrated by this call volume that  
9 makes an area code change for the Tallahassee  
10 Market Area disruptive and undesirable. The  
11 letters from state agencies I have submitted as  
12 exhibits voice significant concerns about the  
13 public confusion and irritation that is likely to  
14 result with a 904 area code change in Tallahassee.  
15 (Exhibit Nos. GWM-1, GWM-2, and GWM-3)

16  
17 **QUESTION:** Are you familiar with other area code changes in  
18 Florida and the impact to state agencies?

19 **ANSWER:** There is an impact on state government with any  
20 area code change in Florida, but none of the  
21 previous changes are of the same magnitude as  
22 changing the area code for the state capital.  
23 From a state agency standpoint, the high community  
24 of interest with outside calling areas statewide  
25 and nationally does not exist in the other Florida

1 locations, as it exists for the state capital.  
2 Many calls coming into Tallahassee for state  
3 agencies are from callers who would not be aware  
4 of the area code change and may be relying on  
5 older, unrevised state information in placing a  
6 call.

7  
8 **QUESTION:** Have you had any experience with trying to change  
9 the dialing habits of your SUNCOM customers in the  
10 past?

11 **ANSWER:** Yes, in fact we changed the off-net dialing plan  
12 for our SUNCOM Network customers about one year  
13 ago. That change required callers dialing a  
14 public switched network (PSN) number to add a "1"  
15 before dialing the 10-digit number. The Division,  
16 in conjunction with the SUNCOM vendors, worked for  
17 one year in preplanning, designing, testing, and  
18 advertising this change. The results were still a  
19 disaster for the first couple of weeks.  
20 Electronic Key Systems, PABXs, fax machines, etc.  
21 had to be reprogrammed, and in some cases the  
22 level of the generic program had to be upgraded.  
23 Today the customers served by the Tallahassee  
24 SUNCOM switch are still dialing incorrectly on the  
25 average of 1200 times per day. If this same



1 experience is encountered through a 904 area code  
2 change to the capital city, then Florida's  
3 citizens will be frustrated. I have a letter from  
4 the State of Alabama that points out this was a  
5 major issue with them during an area code change  
6 in Montgomery two years ago. (Exhibit No. GWM-4)  
7

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

9 **ANSWER:** In my testimony I have addressed two issues that  
10 impact state government should the Tallahassee  
11 Market Area be removed from the 904 area code:  
12 fiscal impact and the disruption to the public  
13 based on a high community of interest with the  
14 Tallahassee Market Area. I have addressed the  
15 financial burden that will be born by state  
16 agencies for reprogramming and redistributing  
17 public information. I have also presented  
18 information on the incoming call volumes that  
19 exist in the Tallahassee Market Area on account of  
20 state government. In closing, I would like to  
21 emphasize one more point, that of service. State  
22 government exists to provide a multitude of  
23 services for its citizens. I am convinced that a  
24 change in the 904 area code would impact the  
25 State's ability to provide quality service and

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become a hard-to-heal sore spot of frustration for  
Florida's citizens and the general public for  
years to come.

QUESTION: Does this conclude your testimony?

ANSWER: Yes.





State of Florida  
Division of Retirement

CEDARS EXECUTIVE CENTER • 2639 C NORTH MONROE STREET • TALLAHASSEE, FL 32399-1500

October 17, 1996

Mr. Glenn Mayne, Director  
Department of Management Services  
Division of Communications  
4015 Esplanade Way  
Building 4030, Suite 260  
Tallahassee, Florida 32399

Dear Mr. Mayne:

As you requested, staff at the Division of Retirement has reviewed the impact of the proposed Centel recommendation to establish a new area code for the Tallahassee area. The major fiscal impact would be with the 18 retirement publications produced biennially and distributed to all or part of the 560,000 members of the FRS, as appropriate for each publication. Each publication includes telephone numbers that would be in error until reprinted. Therefore, the timing of the area code change, combined with the timing of each publication's revision cycle, the lead time available and whether both area codes will be accepted for an extended period would determine the impact on the Division. Total reprinting would cost approximately \$200,000 if done all at once. In addition, forms, letterhead stationary with telephone numbers, and employees business cards must be reprinted or manually altered.

A more important impact would be the inconvenience to the 740,000 members and retirees of the Florida Retirement System, of which approximately 688,000 are located outside the Tallahassee area. Such a change will be an irritant to those customers trying to reach us by telephone and will increase by a slight amount the response time required by Division employees to fill these calls.

Our preference is to keep our current area code and we appreciate your efforts to resist this change if possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "Virginia Bryant".

Virginia Bryant, Administrator  
Research, Education & Policy Section

DIVISIONS OF FLORIDA DEPARTMENT OF STATE

Division of Administration  
Division of Communications  
Division of Information Services  
Division of Management Services  
Division of Public Affairs  
Division of Regulatory Services  
Division of Technical Services  
Division of Training Services  
Division of Records Management  
Division of Statewide Information Systems  
Division of Statewide Information Services  
Division of Statewide Information Systems

MEMBER OF THE FLORIDA CABINET



FLORIDA DEPARTMENT OF STATE  
Sandra B. Mortham  
Secretary of State

HISTORIC PRESERVATION BOARDS

Historic Florida Architecture Board  
Historic Florida Archaeology Board  
Historic Florida Art and Craft Board  
Historic Florida Cultural Resources Board  
Historic Florida Engineering Board  
Historic Florida Historical Resources Board  
Historic Florida Landmarks Board  
Historic Florida Maritime Resources Board  
Historic Florida Natural Resources Board  
Historic Florida Parks and Recreation Board  
Historic Florida Professional Services Board  
Historic Florida Statewide Resources Board

KINGLING MUSEUMS BOARD

23 October 1996

Mr. Glenn Mayne, Director  
Division of Communications  
Department of Management Services  
4050 Esplanade Way  
Building 4030, Suite 260K  
Tallahassee, Florida 32399-0950

Dear Glenn,

This is a follow-up to your telephone request for cost estimates associated with a proposed change in Tallahassee's area code from 904 to 850.

The Divisions within the Department of State, especially Corporations, Licensing and Elections, would have costs associated with a change in area code. In addition to printing new stationery, envelopes, forms, business cards, etc. for the entire Department, it would be necessary to make changes for Internet, PC dial-in setups, public access system, accounts phone, CRS text changes, security phones and fax-out directory in Corporations. Each of our divisions has been contacted and has provided a "best estimate" for conversion effective next spring. With the assumption that there would be nine months to a year grace period, the Department costs would be \$60,000 to \$75,000. This does not assume printing will be done initially but allows for changes to be made to forms when it is time for reprinting.

Aside from the costs of printing and changes to computers, the public confusion and irritation cannot be measured in dollars and would certainly have a tremendous impact on the Telephone Information Section at Corporations.

I hope the above will be helpful. If you need additional information, please let me know.

Sincerely,

Hal Lench, Director  
Division of Administrative Services





DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

Lawton Chiles, Governor

Richard T. Farrell, Secretary

**DATE:** October 24, 1996  
**TO:** Mr. Glenn Mayne, Director of Communications  
**FROM:** Tom Clemons *Tom Clemons*  
**SUBJECT:** Proposed Change In Area Code

In accordance with our earlier discussions, this is to report on the known impact to BPR of the proposed change in Tallahassee's current area code.

The replacement of existing forms or printing notices with changes to the existing area code will cost the department approximately \$25,000 if forms have to be reprinted. It is estimated that one-half this cost would be incurred if an insert were printed to reflect the area code change. Several units of the agency are currently soliciting bids for the printing of various items which will include the unit's phone number. If the area code is changed after these items are printed, there will be additional costs to the agency to modify these numbers.

The changes to our main system applications are estimated to require approximately 300 hours of analyst and programmer time. The estimated cost for this work is \$15,000.

A major cost to the agency will be the inherent cost of making citizens angry if they are not able to reach us when they have a problem. Past experience indicates that multiple attempts to reach a regulatory agency without success leads to great frustration to the taxpayers. This leads to direct costs to them and indirect costs to BPR when we spend a great deal of time explaining the problem and its causes.

Thank you for allowing me the opportunity to share this information with you

STATE OF ALABAMA  
**DEPARTMENT OF FINANCE**  
TELECOMMUNICATIONS DIVISION

61 NORTH UNION STREET, SUITE 201

Montgomery, Alabama 36130

Telephone (334) 242-3432

Fax (334) 242-3500

FOR JAMES H.  
Governor  
L. SAGE LYONS  
Director of Finance

JAMES H. ROWELL  
Assistant Finance Director  
WINDIE H. MURPHY  
Deputy Director

October 29, 1996

Mr. Glenn Mayne  
Director, Division of Communications  
Department of Management Services  
Building 4030, Suite 260  
4050 Esplanade Way  
Tallahassee, FL 32399-0950

Dear Glenn:

Recently I talked with Sam Houston on your staff about a potential area code split in the Tallahassee area. Having been through a similar experience here in Alabama, I wanted to share our experience with you.

In January 1995, the state of Alabama was split into two area codes. Before this time, the area code for the entire state was '205'. After the split, the northern half of the state retained area code '205'. The southern half of the state, which includes the capital, Montgomery, was assigned a new area code, '334'. To complicate matters, '334' was one of the first area codes to be assigned in the new format, with something other than 1 or 0 in the second digit.

BellSouth did provide a permissive period from January 15, 1995 through May 12, 1995. During this time, customers could dial with the "old" area code or the "new" area code.

Problems we experienced during this conversion, included:

- Translation (software) changes in our network node switches were very complex and time-consuming. Testing all these changes was impossible.

SC:HMW 11-15-1995

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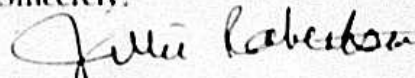
Mr. Glenn Mayne  
October 29, 1996  
Page 2

- Agency PBXs also had to have software changes made. Making sure that the agencies understood what these changes were, and that they implemented them, was difficult.
- Notification was an enormous problem. Despite our best efforts to notify customers (state agencies) and those outside state government who we do business with, many were not aware of and therefore not prepared for the new area code.
- Speed-dials, auto-dials, fax machines, modems, etc. had to be reprogrammed.
- Calling cards, with range privileges, had to be changed to reflect the new area code.
- Letterhead, business cards, etc. for most of state government had to be reprinted.

Overall, our biggest problem appeared to be that many people calling from outside Alabama did not know of the area code split and were unable to call state agencies. Having a transition window helped somewhat, but we still had many who were unaware of the number change when the permissive period ended in May.

Please let me know if I can be of further assistance.

Sincerely,



Julie Robertson, Manager  
Voice Network Operations

JR/dmv

**CERTIFICATE OF SERVICE**


**DOCKET NO. 961153-TL**

I HERBY CERTIFY that a true and correct copy of the foregoing has been sent by prepaid U S Mail to following parties of record, this 1st day of November, 1996

Robert G Beatty  
Phillip Carver  
Stephen M Klimacek  
c/o Nancy Sims  
BellSouth Telecommunications, Inc  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301-1561

Charles Beck  
Deputy Public Counsel  
Office of Public Counsel  
111 W Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Mark Herron  
E Gary Early  
Akerman, Senterfitt & Eidson, P A  
P O Box 10555  
Tallahassee, FL 32302-2555

  
Stephen S. Mathues, Esquire  
Office of General Counsel  
Department of Management Services  
4050 Esplanade Way, Suite 260  
Tallahassee, Florida 32399-0950  
(904) 487-9847



1 two options. The 904 NPA would be expected to exhaust under this option in  
2 October, 2000.

3 Q. What unique problems are presented to cellular providers like BellSouth  
4 Mobility in connection with geographic splits such as those represented by the  
5 industry group in this case?

6 A. Unlike land line telephone numbers, which may be changed from the telephone  
7 company central office, cellular telephone numbers can only be changed by  
8 reprogramming the cellular set. Each customer affected by a geographic NPA  
9 split must bring the cellular set to a service center in order to have it  
10 reprogrammed. BellSouth Mobility estimates that the cost to it of  
11 reprogramming each cellular set is approximately \$15. Not only does this cause  
12 major expense to the cellular carrier, but more importantly, it causes expense  
13 and inconvenience to the cellular customer. Experience has shown that even if  
14 the cellular carriers offer a monetary incentive to have customers come into a  
15 service center, a significant number of these customers will simply not do so.  
16 The inevitable result of this difficulty is the loss of cellular customers.

17 Q. In light of these concerns, which of the geographic split options put forth by the  
18 industry is supported by BellSouth Mobility?

19 A. Inevitably, any NPA adjustment will result in costs on various consumers in  
20 business, industry and government, which costs must be absorbed by those  
21 various consumers. As stated above, any geographic split has undesirable  
22 consequences for the cellular industry. However, in light of the  
23 telecommunication industry consensus in favor of a geographic split, BellSouth  
24 Mobility's view is that Option 1 is the least objectionable approach, with Option  
25 2 also being acceptable. Option 1A is the least desirable and of the greatest

1 concern to the cellular industry. Option 1 provides the most favorable long term  
2 solution and eliminates the need to disrupt the customer base again in two years.  
3 While Option 2 will require further action in two years, it has the smallest  
4 immediate impact on the cellular customer base.

5 Q. Does this conclude your testimony?

6 A. Yes, it does.



- 1 Q. What are the currently available options for a geographic split for the 904 NPA?  
2 A. The industry group has considered the following principal boundary relief  
3 options:

4 **OPTION 1 - Assign New NPA to Pensacola, Panama City, and Tallahassee**

5 This option meets the criteria set forth in the industry guidelines for NPA relief  
6 and provides relief for the longest amount of time for both the new and old  
7 NPAs. The 904 NPA would then be expected to need relief again in  
8 September, 2002. The new NPA, 850, would not exhaust until approximately  
9 November, 2006. It should be noted that the State Department of Management  
10 Services opposes this option due to the costs it would incur to reprint  
11 publications and reprogram premise equipment.

12  
13 **OPTION 1A - Assign New NPA to Jacksonville and Daytona LATAs**

14 This option is inconsistent with the intent of the industry guidelines to minimize  
15 the impact of an NPA split by assigning the new NPA to the areas with the  
16 greatest number of subscribers and NXXs. The Jacksonville and Daytona  
17 LATAs have a significantly greater population than do the Pensacola, Panama  
18 City and Tallahassee LATAs. The assignment of the new NPA to Jacksonville  
19 and Daytona as proposed in Option 1A would, therefore, affect a far greater  
20 number of customers than would either options 1 or 2. The impact on future  
21 NPA exhaust dates, however, would be the same as Option 1.

22  
23 **OPTION 2 - Assign New NPA to Pensacola and Panama City LATAs**

24 While this method has the advantage of impacting fewer subscribers and NXXs  
25 than Options 1 and 1A, it provides a shorter relief interval than either of those