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November 1, 1996

Ms. Blanca S. Bayo
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

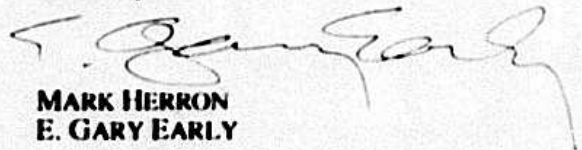
Re: Docket No.: 96-1153-TL

Dear Ms. Bayo:

On behalf of BellSouth Mobility Inc, enclosed for filing in the above docket is the original and 15 copies of BellSouth Mobility Inc's Notice of Filing Testimony of Ron Burleson and the original and 15 copies of the testimony of Ron Burleson.

If you have any questions, please give me a call.

Sincerely,



MARK HERRON
E. GARY EARLY

cc: Parties of Record

MH/EGE/acr
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

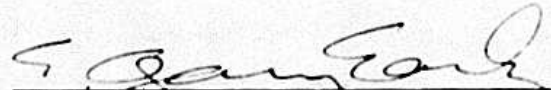
In Re: Petition of BellSouth
Telecommunications, Inc. For Approval
of Numbering Plan Area Relief
For 904 Area Code.

Docket No.: 96-1153-TL
Filed: November 1, 1996

**BELLSOUTH MOBILITY INC's NOTICE
OF FILING TESTIMONY OF RON BURLESON**

BellSouth Mobility Inc, through undersigned counsel, files this Notice of Filing the
attached testimony of Ron Burleson with reference to the above styled case, on this 1st
day of November, 1996.

Respectfully submitted,



**MARK HERRON, ESQUIRE
FLORIDA BAR NO. 199737
E. GARY EARLY, ESQUIRE
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Attorneys for BellSouth Mobility Inc.

DOCUMENT NUMBER DATE

11716 NOV-1996

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this 1st day of November, 1996:

By delivery to:

Charles J. Pellegrini
Martha C. Brown
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Department of Management Services
Bob David/Sam Houston
4030 Esplanade Way
Tallahassee, Florida 32399

Robert G. Beaty, Esquire
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Steven M. Klimacek, Esquire
c/o Nancy Sims
BellSouth Telecommunications
150 South Monroe St., Suite 400
Tallahassee, Florida 32301



MARK HERRON, ESQUIRE
E. GARY EARLY, ESQUIRE

- 1 Q. Please state your name and business address.
- 2 A. My name is Ron Burlison. My business address is 1100 Peachtree Street,
- 3 N.E., Suite 14E06, Atlanta, Georgia 30309-4599.
- 4 Q. By whom are you employed and in what capacity?
- 5 A. I am employed by BellSouth Cellular Corp., the holding company of BellSouth
- 6 Mobility Inc in Florida. I have held the position of Manager, External Affairs
- 7 since 1994.
- 8 Q. What are your current job responsibilities?
- 9 A. I am responsible for the management of BellSouth Cellular Corp.'s state
- 10 regulatory and legislative activities, including development of regulatory policy
- 11 positions and the negotiation of interconnection agreements with local exchange
- 12 companies, and related matters throughout a number of states where BellSouth
- 13 Cellular Corp. operates cellular systems. As part of my responsibilities, I have
- 14 testified before state commissions concerning matters of concern and interest to
- 15 providers of commercial mobile radio services, including cellular.
- 16 Q. Does BellSouth Mobility have an interest in these proceedings?
- 17 A. Yes. BellSouth Mobility provides cellular service in North Florida in the 904
- 18 Number Plan Area (NPA). Therefore, BellSouth Mobility and its customers
- 19 will be impacted by the NPA Relief Plan ultimately chosen and implemented for
- 20 the 904 NPA in North Florida.
- 21 Q. What is the purpose of your testimony?
- 22 A. My testimony will identify the impact on the cellular industry of the relief plans
- 23 currently under consideration for the 904 area. BellSouth Telecommunications,
- 24 Inc., as the code administrator for the 904 area, has informed the code holders,
- 25 including all wireless carriers, that the 904 NPA will run out of NXXs in May

1 of 1998. Therefore, some action must be taken to ensure that telephone
2 numbers are made available to customers of telecommunications service
3 providers in that area.

4 Q. How has NXX exhaustion been handled in the past?

5 A. Historically, when additional numbers were needed, they were obtained
6 through a geographic split. That is to say, the geographic area served by the
7 area code or NPA that was nearing exhaustion was divided along some natural
8 geographic boundary between communities of interest, and a new NPA was
9 assigned to one of these areas.

10 Q. What is the role of current code holders in fashioning a relief plan?

11 A. The North American Numbering Plan's Central Office Code Assignment
12 Guidelines require the Administrator to allow code holders to participate in
13 development of a plan to relieve NPA exhaustion. Code holders are providers
14 of telecommunications services who request code assignments from carriers in
15 order to provide telephone numbers to their customers. This includes paging
16 and cellular providers, but does not include pay phone providers or
17 interexchange carriers.

18 Q. Is a geographic split the relief plan proposed for the 904 area?

19 A. Yes. Industry meetings were conducted on July 31, 1996 and August 22,
20 1996, at which a consensus was reached endorsing the use of the NPA
21 geographic split along LATA boundaries as the method for 904 NPA relief.
22 The industry group rejected use of approaches involving boundary realignment
23 of adjacent NPAs and an NPA overlay. However, no consensus was reached
24 as to which LATA(s) would be removed from the 904 NPA and introduced into
25 the new 850 NPA.

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

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.