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November 1, 1996

BY HAND DELIVERY

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

Re: Petition for numbering plan area relief for 904
area code, by BellSouth Telecommunications, Inc.;
Docket No. 961153-TL

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of
Northeast Florida Telephone Company's Direct Testimony of Lynne G.
Brewer in the above-referenced docket.

Please acknowledge receipt and filing of the above by stamping
the duplicate copy of this letter and returning the same to this
writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

2 JJW/bjm

Enclosures

3 cc: All Parties of Record (w/encls.)

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DOCUMENT NUMBER DATE
11722 NOV-1 1996
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BEFORE THE PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

LYNNE G. BREWER

Q. Please state your name, address and position with Northeast Florida Telephone Company, Inc. ("Northeast" or "The Company").

A. My name is Lynne G. Brewer. I am employed by Northeast as Director - Revenue Requirements and Regulatory Affairs. My business address is 130 North 4th Street, Macclenny, Florida.

Q. Please give a brief description of your educational background and experience.

A. I was graduated from Rollins College with a B.S. degree in Accounting and Business Administration. I have been with Northeast for only one year, but I have over eighteen years of experience in the telecommunications industry. My most recent assignment, prior to joining Northeast, was as a Cost Analysis Manager with the National Exchange Carrier Association (NECA) in the Atlanta regional office. I spent eleven years with NECA in various management assignments. Prior to joining NECA, I was a Telecommunications

1 Consultant with a consulting firm owned by TDS, Inc. I
2 began my career in 1978 with United Telephone Company of
3 Florida (now called "Sprint") as an Accounting Clerk.
4 While at United, I moved rapidly through this company to
5 levels of increased responsibility during my employment.
6

7 Q. What is the purpose of your testimony?
8

9 A. The purpose of my testimony is to state Northeast's
10 position on the appropriate numbering plan area relief in
11 the 904 area code, as identified by the parties of record
12 in this docket.
13

14 Q. Before you state Northeast's position, would you please
15 explain the various forms of relief options for the 904
16 area code that have been promoted by industry code holders
17 as filed by BellSouth Telecommunications, Inc.
18 ("BellSouth") in this docket.
19

20 A. Yes. BellSouth has presented three relief options.
21 Consensus was reached by all code holders and other
22 interested parties that the NPA should be split along LATA
23 boundaries. The five LATAs that would be affected by the
24 904 area code relief plan would be Daytona, Jacksonville,
25 Panama City, Pensacola and Tallahassee. The issue that

1 must be resolved in this docket is which LATAs will be
2 split from the 904 NPA. The three relief options that have
3 been proposed by the industry are:

4 a. Option 1: Assign a New NPA to the Pensacola, Panama
5 City and Tallahassee LATAs

6 b. Option 1a: Assign a New NPA to the Jacksonville and
7 Daytona LATAs

8 c. Option 2: Assign a New NPA to the Pensacola and
9 Panama City LATAs

10
11 Q. In light of the three options noted above, what is
12 Northeast's position regarding the implementation of area
13 code relief by the Florida Public Service Commission
14 ("Commission")? (Issue 1)

15
16 A. Northeast's position on this issue is that Option 1 is the
17 most appropriate choice when the guidelines for NPA relief
18 are considered. It offers the greatest amount of relief
19 for both the new (850) and the old (904) NPAs. Under
20 Option 1, the estimated exhaust date of the 904 area code
21 for the Jacksonville and Daytona LATAs would be October
22 2002 and the anticipated exhaust date of the Pensacola,
23 Panama City and Tallahassee LATAs under the new 850 area
24 code would be November 2006.

25

1 In additional, a smaller number of NXXs (661) would be
2 impacted under Option 1, when compared to the NXXs (1019)
3 located in the Jacksonville and Daytona LATAs under Option
4 1a.

5
6 Under Option 1, Northeast's 7,419 customers would only be
7 impacted when they placed calls to the new 850 serving area
8 (i.e., locations within the Pensacola, Panama City and
9 Tallahassee LATAs). The Company's Extended Local Calling
10 (ELC) plans between Jacksonville and Lake City would not be
11 impacted. If Option 1 is implemented by the Commission,
12 Northeast would only have to change the NPA designation for
13 the 661 NXXs (versus 1019 NXXs) located in the Pensacola,
14 Panama City and Tallahassee LATAs. However, since
15 Northeast is currently installing a new switch, the Company
16 will be required to perform redundant work in both switches
17 until the installation is completed. This means that the
18 Company would be required to change the NPA code for the
19 661 NXXs in both switches. There is a lot of difference
20 between changing 1,322 NXX codes and 2,038 NXX codes in the
21 switch. The latter will take more time and produce a
22 greater chance of error.

23
24 Also, Northeast's area was recently impacted by the 904
25 area code split that was implemented in the Gainesville

1 LATA, which is contiguous to the Jacksonville and Daytona
2 LATAs. Customers in these areas are still adjusting to
3 their area code change. Implementation of another new area
4 code for these customers would present an undue hardship on
5 them soon after the 904 area code split in the Gainesville
6 LATA. Any change in the area code will significantly
7 impact the residential and business customers who subscribe
8 to the variety of telecommunications services that are
9 available in this area, such as land-line telephone
10 service, fax capabilities, paging, cellular, PCS, etc.

11
12 In addition to the above information, the Commission should
13 not overlook the fact that Jacksonville is one of the five
14 largest cities in Florida. It has been identified as one
15 of the top 100 MSAs for implementation of local number
16 portability by the FCC. The target date for implementation
17 is the third quarter of 1998. The proposed date for
18 implementation of the 904 NPA split is February 23, 1998.
19 This only provides a period of five to eight months between
20 these major projects. If an area code change is made in
21 the Jacksonville LATA and then local number portability is
22 implemented five months later, those companies operating in
23 the Jacksonville LATA, including Northeast, will be hit
24 doubly hard with NXX changes and the routing of ported
25 local numbers. Both of these projects will require

1 significant effort to complete. It is not fair to impose
2 a change in the area code on those companies, like
3 Northeast, at the same time that they are struggling with
4 the issues associated with the implementation of local
5 number portability. Nor will it serve the best interests
6 of the customers who live and work in the Jacksonville
7 area.

8
9 Please note that Northeast does not have to comply directly
10 with local number portability requirements by the third
11 quarter of 1998. However, it cannot be ignored that the
12 Company will be significantly impacted. As stated earlier,
13 Northeast has ELC plans that terminate to 148 NXXs in
14 Jacksonville. Jacksonville and its surrounding areas
15 provide a large community of interest to our customers.
16 According to the Baker County Chamber of Commerce,
17 approximately 44% of working adults in Baker County are
18 employed outside Baker County. Ninety percent (90%) of
19 these adults work in the Jacksonville area. These
20 customers will be significantly impacted by a change in the
21 area code and the changes that will be forthcoming with
22 local number portability. Northeast contends that it is
23 unrealistic to expect the average customer to understand
24 all these changes, if they are happening at about the same
25 time. Therefore, Option 1 would provide the best means of

1 implementing area code relief for the 904 NPA.

2
3 **Q.** Does Northeast anticipate opposition to Option 1?

4
5 **A.** Yes. Even though this option provides the best means for
6 904 NPA area code relief, the State of Florida Department
7 of Management Services is opposed to this option, because
8 they believe that the expense of changing the 904 NPA in
9 the Tallahassee LATA would be cost prohibitive and would
10 not serve the public interest. Also, some companies
11 located in the Pensacola, Panama City and Tallahassee LATAs
12 may be opposed to Option 1 for obvious reasons. However,
13 this option should not be discounted by the Commission
14 until all interested parties, including those customers who
15 will be impacted by the proposed NPA changes, have had a
16 chance to voice their concerns.

17
18 **Q.** In light of the opposition to Option 1 noted above, does
19 Northeast have an alternative position on how the
20 Commission should implement area code relief?

21
22 **A.** Yes. For the reasons that I have noted above under Option
23 1, Northeast's alternative position is that Option 2 should
24 be implemented if Option 1 is not acceptable to the
25 Commission. A change in the 904 area code in the

1 Tallahassee, Jacksonville and Daytona LATAs would impact a
2 current population of approximately 2 million, while less
3 than a million people would be impacted if the new area
4 code were implemented in the Pensacola and Panama City
5 LATAs.

6
7 The estimated exhaust date for the 904 area code under
8 Option 2, based on the projections from BellSouth's
9 exhibits in this docket, would be March 2001. The
10 anticipated exhaust date for the 850 area code under this
11 option would be June 2012. Also, the adoption of Option 2
12 will only impact code changes in 558 NXXs, as compared to
13 1019 code changes that would be required if Option 1a is
14 accepted by the Commission.

15
16 Q. When should area code relief be implemented by the
17 Commission?

18
19 A. Northeast's position on the date of implementation is
20 consistent with that proposed by BellSouth in this docket.
21 Permissive dialing should be allowed beginning on February
22 24, 1997, with mandatory dialing to become effective one
23 year later, on February 23, 1998.

24
25 Q. What problems will the numbering area relief plans for 904

1 area code cause Florida citizens and the general public in
2 their efforts to communicate with Florida government?
3 (Issue 2)

4
5 A. If Option 1 is adopted by the Commission, we believe that
6 Florida citizens and the general public may be minimally
7 impacted. Citizens and the general public will have until
8 February 23, 1998 to become familiar with the new 850 area
9 code for Tallahassee. Also, many of the State's consumer
10 telephone lines have been established under 800 numbers,
11 which would not impact the consumer at all.

12
13 Citizens of Florida who reside in the Jacksonville and
14 Daytona LATAs will be impacted more severely than those
15 consumers and the general public who are in contact with
16 the State of Florida. While we recognize the State of
17 Florida Department of Management Services' concerns about
18 the costs to the State of implementing Option 1, we feel
19 that it still provides the best way to implement area code
20 relief.

21
22 In regard to our alternative proposal, Option 2, we see no
23 impact on the general public and Florida citizens in regard
24 to those calls made to State agencies and government
25 offices, since the Tallahassee LATA would remain under the

1 904 area code. The only problem that we see with the
2 implementation of Option 2 would be how to maintain several
3 local calling plans that currently exist between the
4 Tallahassee and Panama City LATAs. However, it is our
5 understanding that the issue of interLATA calling plans
6 will be addressed further in an upcoming Commission
7 hearing. As noted earlier in my testimony, any change to
8 the 904 area code in the Jacksonville and Daytona LATAs
9 will significantly impact the residential and business
10 customers who live and work in this area.

11
12 Q. Would you please summarize your testimony and state what
13 action you recommend the Commission take regarding area
14 code relief?

15
16 A. Yes. Northeast has shown that the optimal plan for
17 implementation of 904 area code relief is Option 1. It
18 best satisfies the guidelines under the North American
19 Numbering Plan (NANP) and provides the largest period of
20 relief for both area codes (850 and 904). In the
21 alternative, Option 2 would also conform to NANP
22 guidelines, impact the fewest number of subscribers,
23 including the State of Florida, and require the least
24 number of NXX code changes.

25

1 We concur with the implementation dates for the new 850
2 area code that BellSouth has proposed in their petition to
3 this Commission.

4

5 We do not anticipate that a significant number of problems
6 will surface with the implementation of either Option 1 or
7 2. However, those customers in the Jacksonville and
8 Daytona LATAs will experience undue hardship if Option 1a
9 is implemented by the Commission.

10

11 Q. Does this conclude your direct testimony?

12

13 A. Yes.