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December 23, 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: Docket No. 961153-TL

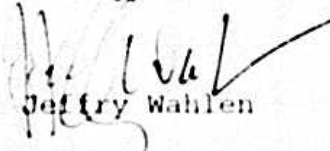
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of ALLTEL's Brief and Posthearing Statement of Issues and Positions.

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


Enclosures

cc: All parties of record

11/23/96 961153-TL

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DOCUMENT NUMBER DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for numbering plan area) DOCKET NO. 961153-TL
relief for 904 area code, by BellSouth) FILED: 12/23/96
Telecommunications, Inc.)
_____)

**ALLTEL'S BRIEF AND POSTHEARING
STATEMENT OF ISSUES AND POSITIONS**

ALLTEL Florida, Inc. ("ALLTEL"), files this Brief and Posthearing Statement of Issues and Positions.

I.

INTRODUCTION

A hearing was held in this docket before the full Commission on December 9, 1996. ALLTEL sponsored the testimony of Harriet E. Eudy, which testimony was inserted into the record as though read. [Tr. 198, 199-204]. Ms. Eudy submitted late-filed exhibit number 15, which presented certain customer statistics by LATA, and answered cross-examination questions from AT&T and Staff. [Tr. 206-208]

II.

BASIC POSITION

ALLTEL recommends Option 1, because it provides the greatest relief for the most amount of time for both the new NPA and the old (904) NPAs. If the Commission does not adopt option 1, the Commission should adopt Option 2.

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III.

ISSUES AND POSITIONS

Issue 1: What geographic split plan for 904 area code relief should be ordered by the Commission?

Position: * ALLTEL recommends Option 1, because it provides the greatest relief for the most amount of time for both the new NPA and the old (904) NPAs. If the Commission does not adopt option 1, the Commission should adopt Option 2.

Discussion:

How to fashion NPA is a difficult issue because of the potential impact on the carriers and their customers. ALLTEL serves more than 74,000 access lines in 27 exchanges in Florida. [Tr. 200] More than 62,000 of those access lines, or 21 exchanges, are located in the Jacksonville LATA. [Tr. 200] If the relief plan that is ultimately adopted results in number changes for existing 904 customers in the Jacksonville LATA, ALLTEL will be impacted significantly. [Tr. 200] Switch programming would be required to change all existing customers' numbers and to program our switches to recognize this code in routing future traffic. [Tr. 200] Operational Support Systems ("OSS"), including billing, customer service, repair reporting and testing, would need to be updated. [Tr. 200] Additional administrative expense will be incurred to provide customer notification of the changes and respond to customer inquiries and/or complaints. [Tr. 200] Also, like other businesses that experience number changes, our Florida

operation will be required to change all of its stationery, business forms, etc. to reflect the new area code, since these offices are also located in the Jacksonville LATA. [Tr. 200]

ALLTEL's customers also will be significantly impacted by a decision in this docket if the plan that is ultimately adopted results in a change in the area code for the Jacksonville LATA. [Tr. 201] Business customers will be required to change their business forms, stationery, and other places their number is published to reflect the new area code. [Tr. 201] Customers in several of ALLTEL's exchanges, which are contiguous to the Gainesville LATA, have recently felt the impact of another area code change when the Gainesville LATA received a new code. [Tr. 201] ALLTEL received a number of calls from customers who are located close to the Gainesville area and were confused by the change. [Tr. 201] Another split would be something of a "double whammy" for these customers. [Tr. 201]

With these and other concerns in mind, representatives of the industry met to discuss the options for 904 NPA relief. As a result of those meetings, three relief options were identified by the industry as follows:

- a. Option 1: Assign a New NPA to the Pensacola, Panama City and Tallahassee LATAs
- b. Option 1a: Assign a New NPA to the Jacksonville and Daytona LATAs
- c. Option 2: Assign a New NPA to the Pensacola and Panama City LATAs [Brewer, Tr. 114]

When dealing with NPA relief issues, industry objectives are to (1) provide the longest relief period, (2) minimize the number of customers who require changes, and (3) to minimize technical and operational impacts. [Tr. 201]

Of the three options presented by the industry, Option 1 best meets the industry objectives, because it provides the greatest relief for the most amount of time for both the new NPA and the old (904) NPAs as determined by BellSouth, the code administrator for the 904 NPA, and as noted in their petition to the Commission, item 82, filed September 9, 1996. [Tr. 202] The 904 NPA for the Jacksonville and Daytona LATAs would be expected to exhaust in September 2002. [Tr. 202] The new NPA for the Pensacola, Panama City, and Tallahassee LATAs would be expected to exhaust in November 2006. [Tr. 202-203]

The other options are sub-optimal. Option 2 seems to meet the objectives as a second choice because it impacts fewer subscribers and NXXs than Options 1 and 1a; however, this approach provides a shorter relief interval than those options. [Tr. 204] Under Option 2, the 904 NPA would be expected to exhaust in October 2000. [Tr. 203] Option 1a is inappropriate because, Option 1a would impact a greater number of subscribers and NXXs than Option 1; however, the exhaust dates to the respective LATAs would remain the same. [Tr. 203]

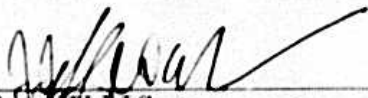
Issue 2: How and when should the area code relief be implemented?

Position: * ALLTEL agrees with Northeast that permissive dialing

should be allowed beginning on February 24, 1997, with mandatory dialing to become effective one year later, on February 23, 1998.

Discussion: ALLTEL's position on this issue is supported by the testimony of Ms. Lynne G. Brewer of Northeast at Tr. 119-120.

DATED this 23d day of December, 1996.



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ATTORNEYS FOR ALLTEL
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CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 23d day of December, 1996, to the following:

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