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FILE COPY

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

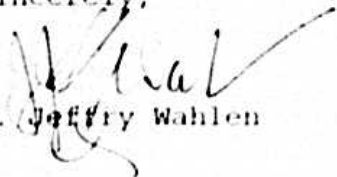
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Northeast'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

11/26/96

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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. )  
\_\_\_\_\_)

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

Northeast Florida Telephone Company ("Northeast"), 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. Northeast sponsored the testimony of Lynne G. Brewer, which testimony was stipulated into the record. [Tr. 110, 112-122]. Ms. Brewer did not sponsor any exhibits, and there was no cross-examination for her.

II.

**BASIC POSITION**

Option 1 is the most appropriate choice when the guidelines for NPA relief are considered. It offers the greatest amount of relief for both the new (850) and the old (904) NPAs. Option 2 should be implemented if Option 1 is not acceptable to the Commission. Northeast is opposed to the proposal set forth in late-filed exhibit no. 9 because it will disrupt 7 digit dialing (25 cents) between 3 routes involving Northeast's customers.

DOCUMENT NUMBER-DATE

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FLORIDA PUBLIC SERVICE COMMISSION

### III.

#### ISSUES AND POSITIONS

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

**Position:** \* Option 1 is the most appropriate choice when the guidelines for NPA relief are considered. It offers the greatest amount of relief for both the new (850) and the old (904) NPAs.

**Discussion:**

The petitioner in this case presented three options for NPA relief. [Tr. 113] At various industry meetings, consensus was reached that the NPA should be split along LATA boundaries. [Tr. 113] The five LATAs that would be affected by the 904 area code relief plan would be Daytona, Jacksonville, Panama City, Pensacola and Tallahassee. [Tr. 113] The issue that must be resolved in this docket is which LATAs will be split from the 904 NPA. [Tr. 114] The three relief options that have been proposed by the industry are:

- 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 [Tr. 114]

Option 1 is the most appropriate choice when the guidelines for NPA relief are considered. [Tr. 114] It offers the greatest

amount of relief for both the new (850) and the old (904) NPAs. Under Option 1, the estimated exhaust date of the 904 area code for the Jacksonville and Daytona LATAs would be October 2002 and the anticipated exhaust date of the Pensacola, Panama City and Tallahassee LATAs under the new 850 area code would be November 2006. [Tr. 114] In addition, a smaller number of NXXs (661) would be impacted under Option 1, when compared to the NXXs (1019) located in the Jacksonville and Daytona LATAs under Option 1a. [Tr. 115]

Importantly, customers in Northeast's service territory were recently impacted by the 904 area code split that was implemented in the Gainesville LATA, which is contiguous to the Jacksonville and Daytona LATAs. [Tr. 115-116] Customers in these areas are still adjusting to their area code change. [Tr. 116] Implementation of another new area code for these customers would present an undue hardship on them soon after the 904 area code split in the Gainesville LATA. [Tr. 116] Any change in the area code will significantly impact the residential and business customers who subscribe to the variety of telecommunications services that are available in this area, such as land-line telephone service, fax capabilities, paging, cellular, PCS, etc. [Tr. 116]

Northeast's alternative position is that Option 2 should be implemented if Option 1 is not acceptable to the Commission. [Tr. 118] A change in the 904 area code in the Tallahassee, Jacksonville and Daytona LATAs would impact a current population of

approximately 2 million, while less than a million people would be impacted if the new area code were implemented in the Pensacola and Panama City LATAs. [Tr. 118-119]

The estimated exhaust date for the 904 area code under Option 2, based on the projections from BellSouth's exhibits in this docket, would be March 2001. [Tr. 119] The anticipated exhaust date for the 850 area code under this option would be June 2012. [Tr. 119] Also, the adoption of Option 2 will only impact code changes in 558 NXXs, as compared to 1019 code changes that would be required if Option 1a is accepted by the Commission. [Tr. 119]

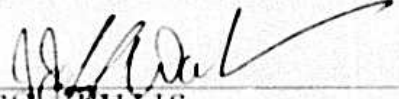
Northeast has reviewed late-filed Exhibit No. 9 and the proposal evaluated therein. Northeast is opposed to the proposal evaluated therein, because it would disrupt 7 digit calling (25 cents) between these routes involving Northeast's customers. See LF Exhibit No. 9.

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

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

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

DATED this 23d day of December, 1996.

  
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NORTHEAST FLORIDA TELEPHONE  
COMPANY

**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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