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December 23, 1996

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Ms. Blanca S. Bayo
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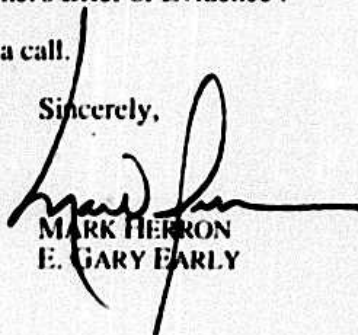
Re: Docket No. 96-1153-TL

Dear Ms. Bayo:

On behalf of BellSouth Mobility Inc., enclosed for filing in the above docket is the original and 15 copies of the BellSouth Mobility Inc.'s Brief of Evidence.

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

Sincerely,



MARK HERRON
E. GARY EARLY

cc: Parties of Record
MH/EGE/cl
Enclosures
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PROD. RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Numbering Plan Area
Relief for 904 Area Code,
by BellSouth Telecommunications, Inc.

**ORIGINAL
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Filed: December 23, 1996

BELLSOUTH MOBILITY INC
BRIEF OF THE EVIDENCE

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FPCO RECORDS/REPORTING

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I. STATEMENT OF THE CASE

On September 20, 1996, BST Telecommunications, Inc. (BST), filed a petition for numbering plan area relief for the 904 area code. BST, as central office code administrator, stated that it had determined that there would be an exhaustion of numbers in the 904 NPA by approximately May 1998. BST stated that at industry meetings, held on July 31, 1996 and August 22, 1996, industry representatives had not been able to reach consensus on how to provide the relief required. The matter was set for a formal administrative hearing before the Florida Public Service Commission (Commission).

The industry code-holders and various other telecommunications providers operating in the 904 area code reached a consensus that the most appropriate form of relief for the 904 NPA was a geographic split along LATA boundaries. The industry developed three principal LATA boundary relief options: Option 1 which assigns a new NPA (850) to the Pensacola, Panama City, and Tallahassee LATAs; Option 1A which assigns a new NPA (850) to the Jacksonville and Daytona LATAs; and Option 2 which assigns a new NPA (850) to the Pensacola and Panama City LATAs. These proposed options were set forth in the petition filed by BST. The Commission also held service hearings in Pensacola, Panama City, Tallahassee,

Daytona Beach, and Jacksonville in November 1996, to receive public comment on the proposed area code change.¹

In response to BST's petition, several parties petitioned and were granted permission to intervene in this proceeding. BellSouth Mobility Inc's (BMI) petition to intervene was granted on November 1, 1996.² A formal administrative hearing was held before the Commission on December 9, 1996. The testimony of the following witnesses was presented at hearing: Daniel M. Baeza (BST); Glenn A. Mayne (Department of Management Services); Lynne G. Brewer (Northeast Florida); Thomas M. McCabe (Quincy); Donald D. Bowden (St. Joseph, Florida and Gulf); Harriet E. Eudy (ALLTEL); Ron Burlison (BMI); and Sandra A. Khazraee (United/Centel). AT&T was granted intervenor status at the hearing, but tendered no witness or testimony. The hearing produced a transcript of 236 pages and 15 exhibits.

This brief is submitted in accordance with the post-hearing procedures of the Commission set forth in Rule 25-22.056, Florida Administrative Code. The statement of each issue identified in this proceeding is followed immediately by a summary of position on that issue and a discussion of the basis of that position. Each summary of BMI's position is labeled accordingly and marked by two asterisks.

¹ The relief options identified herein as Options 1, 1A and 2 were identified as Options 1, 2, and 3, respectively, in the Commission's Special Report distributed at the service hearings. References to the various options in this brief reflect their designation in BST's petition for relief.

² Order No. PSC-96-1329-PCO-TL.

II. STATEMENT OF BASIC POSITION

Of the three LATA boundary relief options developed by the industry, it is the position of BMI that Option 1 is the least objectionable approach, with Option 2 also being acceptable. Option 1 would assign a new NPA to the Pensacola, Panama City and Tallahassee LATAs. Option 2 would assign a new NPA to the Pensacola and Panama City LATAs. Option 1 provides the most favorable long-term solution and eliminates the need to disrupt the customer base again in two years. Option 1A is the least desirable of the three options presented.

III. POSITIONS ON THE INDIVIDUAL ISSUES

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

****Position:** Of the three options identified by the industry group, Option 1 is the most desirable option and should be implemented by the Commission.**

The Commission has previously determined those factors that it considers when addressing appropriate area code relief. Order No. PSC-95-1048-POF-TL. In order of their relative importance, the following criteria have been determined by the Commission as being relevant:

1. Competitive Concerns:
 - a. impact on the development of local exchange competition;
 - b. favor or disadvantage to particular industry segments or groups of consumers;

c. favor or disadvantage one technology or another.

2. Impacts to Customers:

- a. customer confusion;
- b. changes to customers telephone numbers;
- c. effects on any community of interest;
- d. implementation costs of the plan;
- e. changes in the customers' dialing patterns;
- f. adequate time for customer education.

3. Impacts to Carriers:

- a. implementation costs of the plan;
- b. availability of numbering resources to code holders on an efficient and timely basis.

4. Length of Area Code Relief:

- a. efficient use of numbering resources in both the short and long term;
- b. allowance for more future options for area code relief in the [NPA];
- c. implementation prior to exhaust of the [904] NPA;
- d. allowance for an appropriate permissive dialing period.

Order No. PSC-95-1048-FOF-TL, at pp. 7-8. In applying these criteria, the Commission has concluded that "the concerns of customers and carriers alike should be considered in the development of a relief plan...." *Id.* In giving weight to the criteria listed above, the Commission has determined that competitive concerns "should be the highest priority of the Commission when selecting a relief plan." *Id.* Possible impacts to customers are "the next most important criteria and [the Commission weighs] it only slightly less in terms of priority than competitive concerns." *Id.* Impacts to

carriers are third in order of priority. The Commission is of the view that the carriers are "more capable of handling the changes that are required than the general body of customers, provided they are given adequate time." Id. "The length of area code relief is fourth in order of priority." Id. The Commission has determined that this criteria is secondary to competitive concerns, effects on customers, and effects on carriers. Id.

In addition to the three options presented by BBT in its petition, the industry group considered a number of alternative options for 904 area code relief. (T. 39) The industry group considered full and partial overlays, boundary realignments, and several additional geographic splits. (T. 40; Exhibit 6, p. 16) Considered geographic splits included: splitting-off the Pensacola LATA; splitting-off the Panama City LATA; splitting-off the Daytona LATA; a three-way split; and two intralATA splits, involving the Panama City LATA and the Jacksonville LATA. (T.40) These alternative options were rejected by the industry group because they did not meet the industry guidelines and/or they created additional inconvenience for customers. (T. 40)

The Commission held service hearings in Pensacola (November 4, 1996), Panama City (November 5, 1996), Tallahassee (November 7, 1996), Daytona Beach (November 13, 1996), and Jacksonville (November 21, 1996), to obtain public testimony concerning the petition for numbering plan relief for the 904 area code. The Commission presented the three

options proposed by BST in its petition as the focus of those service hearings. (See, e.g, Panama City Service Hearing, p. 6; Jacksonville Service Hearing, p.7.)

During the course of the formal administrative hearing held in Tallahassee, an additional plan was discussed involving a three-way split of the 904 NPA which would split the Jacksonville LATA east and west, combine East Jacksonville with the Daytona LATA in one NPA; combine West Jacksonville with the Tallahassee LATA in a second NPA; and combine the Panama City LATA and the Pensacola LATA in a third NPA. (T. 44-45; Late Filed Exhibit 9.) Consistent with precedent of the Commission, all potential options including those proposed by BST in its petition and the additional option discussed at hearing must be evaluated according to the criteria set forth above. Order No. PSC-95-1048-FOF-TL, at p. 9.

1. Competitive Concerns

a. Development of Local Exchange Competition

There is no evidence in the record that adoption of any one of the geographic split options presented at hearing will be of greater or less advantage to disadvantage new providers of local exchange service when local exchange competition begins.

b. Favor or Disadvantage to any Particular Industry or Group of Consumers

No evidence was presented at hearing that adoption of any of the geographic split options would favor any

particular industry or group of consumers from a competitive point of view. Cellular providers and customers will have to have their cellular units reprogrammed to reflect the new NPA, while traditional telephone lines can be adjusted at the switch. (T. 213; Panama City Service Hearing, pp. 17-18)

c. Favor One Technology or Another

No evidence was presented that would show that any of the geographic splits favored one technology over another.

Conclusion Regarding Competitive Concerns

There is no evidence that there will be any adverse impact on competition from adoption of any of the three options presented by BST in its petition or by adoption of the three-way split discussed at hearing. Cellular carriers and customers will experience additional burdens not otherwise experienced by other traditional telephone customers. From a competitive point of view, however, the options presented at hearing are, for the most part, neutral.

2. Impacts to Customers

Since there is no evidence that any of the geographic split options considered at the hearing adversely impact competitive concerns, the degree to which customers are affected by the different plans becomes more important in determining an appropriate relief plan. Order No. PSC-95-1048-FOF-TL, p. 14.

a. Customer Confusion

The parties are in agreement that there will be some customer confusion no matter which relief plan will be

implemented. (See, e.g. T. 144; T. 224-225; T. 116) The position of each party as to which plan will cause the most customer confusion depends on which plan the party supports.

With respect to Option 1 which would assign a new area code to Tallahassee, the Department of Management Services (DMS) has argued that there will be significant "customer" confusion arising from citizens attempting to call agencies of state government who would be unaware of the area code change and who may be relying on old information in placing a call. (T. 144) Yet the DMS witness conceded that this customer confusion would be lessened by state agency regional offices, by the use of 800 numbers by state agencies, and by information contained in directory assistance pages of the telephone books. (T. 162-163) It was established that several agencies utilized regional offices. (T. 162) In addition, DMS estimated that approximately 70% of all state agencies utilize 800 numbers for incoming calls. (T. 162) Finally, a permissive dialing period would significantly reduce the confusion and irritation of the state's "customers."

The example used by the DMS witness of dialing errors on the SUNCOM System to posit the degree of customer confusion resulting from an area code change affecting Tallahassee is neither compelling nor comparable. The problem experienced by the state when it changed its SUNCOM procedures involved a change in the number of digits required to be dialed and not a change in a number to be dialed. (T.

166-167) Likewise, it was established at hearing that most customers in the State of Florida have been affected, either directly or indirectly, by an area code change in the past two years and that it would be reasonable to expect that Florida customers would understand and be able to respond to an area code change affecting state government. (T. 167-168) Potential confusion to "customers" of the state was not shown to be of any greater magnitude than the potential confusion to any customer of a private sector business as a result of an area code change.

Business customers will experience many of the same problems as does the state when there is an area code change. (T. 161-162) Testimony presented at the Jacksonville service hearing by an exporter of heavy construction equipment who advertised in business Yellow Pages worldwide indicated that, as a company, it expected a revenue loss of 20% to 25% as a result of a change in the 904 area code. (Jacksonville Service Hearing, pp. 27-32) In assessing the impact of an area code on business customers, it is significant to note that BST serves 220,100 business access lines in the Jacksonville LATA. (Late Filed Exhibit 11) and that Sprint serves 2328 business access lines in the Jacksonville LATA. (T. 231) By contrast, Sprint serves 99,090 business access lines in the Tallahassee LATA. (T. 231) In the Daytona LATA, BST serves 67,164 business access lines. (Late Filed Exhibit 11) It is clear, therefore, that changing the area code designation in the Jacksonville LATA and the Daytona

LATA will have a more significant impact on business customers than changing the area code designation in the Tallahassee LATA.

There was very little testimony from Florida residential customers regarding the impact of any of the proposed relief options.

b. Changes to Customers' telephone numbers

Option 1, which retains the Jacksonville and Daytona LATAs in the 904 NPA, and assigns a new NPA to Tallahassee, Panama City and Pensacola LATAs affects far fewer business and residential customers than Option 1A, and provides a longer relief period than Option 2. Option 1A, which assigns a new NPA to the Jacksonville and Daytona LATAs affects a greater number of customers, business and residential, than either Option 1 or Option 2. (See, e.g., T. 23-24; Exhibit 4, p. 22; T. 212; T. 115-116) While Option 2, which assigns a new NPA to the Panama City and Pensacola LATAs, affects the fewest number of customers' numbers, it also provides the shortest relief period for the remaining 904 NPA. Within two years, the 904 NPA would require another relief plan. (T. 223) The three-way split discussed at hearing would potentially affect the greatest number of customers of all the plans advanced. (Late Filed Exhibit 11; T. 231)

In addition to number changes, cellular customers must return their telephones for reprogramming. Each customer affected by a geographic split must bring the

cellular set to a service center in order to have it reprogrammed. (T. 213; Panama City Service Hearing, pp. 17-18) It is estimated that the cost to program each cellular set is approximately \$15, in addition to the time and inconvenience to the customer in bringing the unit in for reprogramming. (T. 213; Panama City Service Hearing, pp. 18-19) Option 1 would cause the least cost to providers and inconvenience to customers of the available options. create the next least expense to cellular carriers and their customers. Option 1A would be the worst option from this perspective.

c. Effect on community of interest

The industry group reached consensus that an NPA geographic split along LATA boundaries was the appropriate method of relief for the 904 NPA. (T. 22; T. 26). It was the opinion of the industry that LATA boundaries, by their very nature, have communities of interest associated with them. (T. 54; T. 191; T. 229) The only option that would split an existing LATA is the option proposed at the hearing. That option would disrupt dialing patterns between the following areas: Baldwin to Macclenny and Sanderson; Jacksonville to Macclenny and Sanderson; and Maxville to Macclenny and Sanderson. Due to the geographic and cultural proximity of these areas, the splitting of the Jacksonville LATA would disrupt a historical community of interest. (Late Filed Exhibit 9) There is, however, no technological reason

that compels an NPA geographic split along a LATA boundary. (T. 54; T. 229).

d. Implementation Costs

There is no significant dispute as to the costs to customers resulting from any of the geographic split options:

1. Business customers will have to change stationery, business cards and any advertisements that indicate the area code.

2. Service companies will be required to reprogram automatic dialing instruments.

3. Cellular customers will have to take their cellular telephones to a service center to be reprogrammed.

4. Business customers must have their PBXs reprogrammed to handle the new area code.

The DMS witness testified that the State of Florida would be forced to absorb significant costs in the event Option 1 were to be implemented by the Commission. (T. 131-133; Exhibit 14, pp. 86-91) These costs were not supported by evidence in the record. Moreover, significant assumptions upon which the costs were based were shown to be erroneous or flawed in their application. (T. 158-159) The state conceded that some of the costs set forth in its estimate would be incurred no matter which option were to be implemented. (T. 161) Notwithstanding the state's assertions, it is clear that all business and all business customers will incur some costs for implementing a new area

code. (T. 161-162) The largest concentration of business access line customers is in the Jacksonville LATA. (Late Filed Exhibit 11; T. 213) Businesses in the Jacksonville LATA would be required to absorb significant costs if the area code for the Jacksonville NPA were to be changed. (See, Jacksonville Service Hearing)

e. Changes in the customers' dialing patterns

There is no dispute as to the specific dialing pattern changes that would be required with implementation of any of the options reviewed at hearing. The proposed dialing patterns for the 904 area code and the new NPA(s) are as follows:

1. Local calls within an area code- 7 digits.
2. Toll calls within an area code- 1+10 digits.
3. Local calls between two area codes- 1+10 digits.
4. Toll calls between two area codes- 1+10 digits.
5. All operator assisted calls- 0+ 10 digits.

(Exhibit 8)

Depending on which geographic split option is ordered, there is a potential change in dialing patterns for local calls across the new NPA boundary. Certain carriers participating in the hearing expressed a preference to preserve seven-digit dialing across the new NPA boundary. (T. 127; T. 191; T. 207). In order to preserve seven digit dialing, NXX codes must be protected. (T. 71; T. 90). Protecting codes is not favored because it reduces the number of NXXs available for future assignment. (T. 90) Dividing a LATA increases the possibility that ten-digit dialing could be required for what is now a local call. (T. 192) The

split of the Jacksonville LATA into two NPAs as proposed at hearing will disrupt 7-digit calling between the following areas: Baldwin to Macclenny and Sanderson; Jacksonville to Macclenny and Sanderson; and Maxville to Macclenny and Sanderson. (Late Filed Exhibit 9)

f. Customer Education

There was no evidence presented as to the time needed for customers to understand and adapt to a new relief plan. The proposed permissive dialing period extending into the second quarter of 1998 will assist customers in adapting to the relief plan. Utilization of directory assistance and telephone directory information will likewise assist customers in adapting to the new NPA. Most significantly, however, is the fact that a large number of Florida customers have direct or indirect experience with area code changes and that they have been educated to the need for and the result of area code changes.

Conclusion Regarding Impacts to Customers

The implementation of a geographic split along LATA boundaries will minimize the need to change dialing patterns and will enhance customer adjustment to the new NPA. To minimize the impact and costs to business, it would be appropriate to assign the new NPA consistent with Option 1. The Tallahassee, Panama City and Pensacola LATAs have significantly fewer delete of business access lines than do the Jacksonville and Daytona LATAs. By minimizing the costs

to business customers generally, the costs of implementing the relief plan are likewise minimized.

3. Impacts to Carriers

a. Implementation Costs of the Plan

There was no evidence presented regarding the costs relative to the exchange companies of implementing any of the three options presented by BST in its petition. The evidence in the record suggests that there would be no significant additional expense to the exchange companies if the 3-way split discussed at hearing were to be implemented rather than one of the options presented in the BST petition. (T. 49) Cellular providers have indicated that there would be significant cost impacts associated with the reprogramming of their customers' cellular telephones. (T. 213; Panama City Service Hearing, pp. 18-19). Option 1 which affects the longest number of cellular customers would be the most expensive of the option from a cellular perspective.

b. Availability of Numbering Resources to Code Holders on an Efficient and Timely Basis

There is no dispute among the parties as to exhaust date of the 904 NPA, nor is there any evidence that any of the options will not provide numbering resources in an efficient and timely manner, with the possible exception Option 2 which will provide a far shorter period of relief.

4. Length of Area Code Relief

a. Efficient Use of Numbering Resources in Both the Short and Long Term

The length of relief provided by the various plans contained in the petition submitted by BST varies significantly. Option 1, which assigns a new NPA (850) to Pensacola, Panama City, and Tallahassee LATAs, would exhaust in approximately November, 2006. The remaining portion of the 904 NPA consisting of the Jacksonville and Daytona LATAs would be expected to need relief in September, 2002. (T. 23; Exhibit 4, p.1) Option 1A, which is the reciprocal of Option 1 and which assigns a new NPA (850) to the Jacksonville and Daytona LATAs, would reach exhaust in those LATAs in approximately September, 2002. The remaining portion of the 904 NPA consisting of the Pensacola, Panama City, and Tallahassee LATAs would need relief in November, 2006. (T. 23; Exhibit 4, p.2) If Option 1A, were implemented the area with the smallest number of lines would have virtually no impact for approximately 10 years, while the LATAs with a far greater number of lines would be affected twice in approximately 5 1/2 years. Option 2, which assigns a new NPA (850) to the Pensacola and Panama City LATAs, would exhaust in those LATAs in approximately May, 2012. The remaining portion of the 904 NPA consisting of the Tallahassee, Jacksonville, and Daytona LATAs would require relief in October, 2000. (T. 23; Exhibit 4, p.3) The three-way split discussed at hearing would have the following anticipated exhaust dates: the East Jacksonville and Daytona LATAs would

exhaust in 2003; the West Jacksonville and Tallahassee LATA would exhaust in 2033; and the Pensacola and Panama City LATAs would exhaust in 2012. (Late Filed Exhibit 9) The anticipated exhaust dates make allowance for new competitors entering the market. (T. 58-59)

Option 1 meets the criteria set forth in the industry guidelines for NPA relief. (T. 23; Exhibit 4, pp. 4-18) Option 1A circumvents the intent of the industry guidelines to minimize the impact of an NPA split by assigning the new NPA to the areas with the greatest number of subscribers and NXXs. (T. 23; Exhibit 4, p.2) Option 2 impacts fewer subscribers and NXXs than Options 1 or 1A, but it provides a shorter relief period than either of those two. (T. 23-24; Exhibit 4, p.3.)

The three-way split discussed at hearing potentially affects a greater number of subscribers than any of the other options depending on which of the three proposed NPAs retains the 904 NPA designation. (Late Filed Exhibit 9) While the three-way split discussed at hearing provides for the greatest long-term NXX relief of all the options considered, the unused capacity of NXX codes for such a long period of time results in an underutilization of codes and is inconsistent with industry guidelines. (T. 78)

b. Allowance for More Future Options for Area Code Relief

Each of the proposed options provides sufficient latitude for future relief of the 904 area code or the new NPA, whether by additional geographic split or overlay.

c. Implementation Prior to Exhaust of 904 NPA

There was no dispute among the parties as to when the existing 904 area code would exhaust.

d. Allowance for an Appropriate Permissive Dialing Period

See Issue 2, below.

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

****Position:** Relief should be implemented through a transition plan, which should allow permissive dialing after a certain period and mandatory dialing to commence in the second quarter of 1998.**

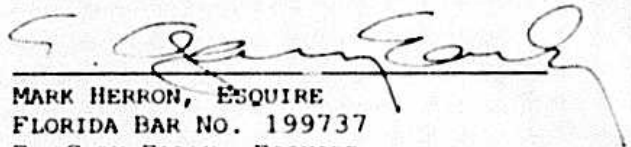
The parties are in agreement that relief should be implemented through a transition plan which would allow permissive dialing to begin within three to six months of the PSC decision with respect to relief and with mandatory dialing to commence in the second quarter of 1998. (T. 24) It is essential to cellular carriers that an extended permissive dialing period be provided so that cellular telephones can be reprogrammed in due course, upon normal customer visits, rather than on a more costly "recall" basis. No evidence was produced at hearing that challenged this implementation schedule.

IV. CONCLUSION

Upon consideration of the testimony and other evidence in the record and weighing the evidence pursuant to the established criteria, the Commission should find that the greater weight of the evidence supports the implementation of a geographic split in accordance with Option 1 as set forth in the BST petition. Option 1 assigns a new NPA (850) to the Pensacola, Panama City and Tallahassee LATAs.

Since each of the plans considered at hearing are competitively neutral, potential impacts to customers becomes the most significant criteria to be considered. Option 1 minimizes the impacts to residential and business customers consistent with industry guidelines to provide a sufficient time period for relief. The relief plan should be implemented through a transition plan which would allow permissive dialing to begin within three to six months of the Commission's decision and with mandatory dialing to commence in the second quarter, 1998.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this 24th day of December, 1996:

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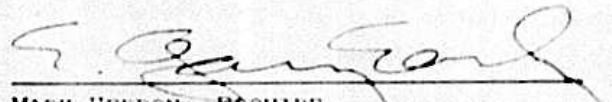
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