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December 30, 1996

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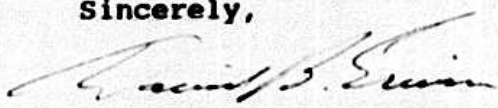
Re: Petition for numbering plan area relief for 904 area  
code by BellSouth Telecommunications, Inc.  
Docket No. 961153-TL

Dear Ms. Bayo:

Enclosed is a revised Post Hearing Statement which is  
intended to adhere to the mandatory format requirements set forth  
in Rule 25-22.056(3)(a), F.A.C., including asterisks and a  
reiteration of each of the two issues addressed by the pleading.

The substance of the post hearing statement remains  
unaltered. I mention this with the hope of heading off anyone  
who might be otherwise lured into an unnecessary double reading.

Sincerely,



David B. Erwin

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 3 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
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- SEC 1 \_\_\_\_\_
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DBE:akh  
Enclosures

DOCUMENT NUMBER DATE

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FLORIDA PUBLIC SERVICE COMMISSION

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for numbering )  
plan area relief for 904 )  
area code, by BellSouth )  
Telecommunications, Inc. )

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Docket No. 961153-TL  
Filed: December 20, 1996  
Format Rev.: December 30, 1996

**POST HEARING STATEMENT**

**FACTS**

There is little need to belabor the facts. They are simple. Some portions of the territory covered by the 904 area code must receive a number change right away. The current exhaust date for the 904 NPA is May, 1998. (TR4) No party in this docket wants to be directly affected by an area code number change, and none of the options presented for consideration precisely satisfy the guidelines of the Industry Carriers Compatibility Forum (ICCF). Faced with this dilemma, what is the most reasonable solution for the Commission?

**BASIC POSITION**

Quincy Telephone Company and the St. Joseph Telecommunications companies submit that the most significant and widespread benefits for the entire state of Florida could be achieved through the so-called "Three Way Split" plan. This plan would leave the 904 area code in the Tallahassee Market Area and the panhandle LATAs (Panama City and Pensacola), provide a new area code for the Jacksonville LATA and another new area code for the Daytona Beach LATA. This "Three Way Split" would not fully comply with the ICCF Guidelines (Exhibit 2), but then neither would any of the other plans being considered.

DOCUMENT NUMBER DATE

13800 DEC 30 96

TYPE OF CASE/HEARING

## POSITIONS ON THE INDIVIDUAL ISSUES

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

**\*\*\* Position: Quincy Telephone Company and St. Joseph Telecommunications support the "Three Way Split" plan as the best alternative available.\*\*\***

### The ICCF Guidelines:

The purpose of the ICCF Guidelines is to help NPA Relief Coordinators. The Guidelines apply only to geographic NPA relief planning. They were developed to facilitate and standardize the NPA relief planning process without favoring any particular interest group.

The guidelines would have new area codes exhaust in 8-10 years. They would not support a differential between exhaust dates of more than 15 years. They would be against an exhaust date of less than 5 years. Like an inartful plagiarism of "Goldilocks and the Three Bears," the guidelines call for an exhaust period that is not too long and not too short, but just right. Like any fairy tale, however, it probably can not come to pass.

BellSouth's witness, Daniel Baeza, favors the so called Option 1, which assigns a new area code to Tallahassee and the panhandle LATAs, while leaving the Jacksonville and Daytona Beach LATAs in the 904 area code. (TR7) Option 1 meets the guideline criteria insofar as the exhaust date for Tallahassee is concerned (2006). If the whole picture is considered, however, Option 1

fails the guideline test just like all the other options. If the Jacksonville and Daytona Beach LATAs remain in the 904 area code, it will exhaust very soon (2002), and there will have to be action taken at that time. If the Jacksonville and Daytona Beach LATAs are then split along LATA boundaries, the Daytona Beach LATA will have an exhaust date that is too far in the future (2030), and the Jacksonville LATA will need to be readdressed in under 5 years (2006). In addition, there would be a differential that would exceed 15 years. Option 1 merely postpones unavoidable deviation from the Guidelines.

Indeed, regardless of whether there is a "Three Way Split" or Option 1 is adopted, there will of necessity be two new area codes in the 904 area code within the very near future, and no matter which plan is recommended, there will be an unavoidable deviation from the ICCF Guidelines. (TR 185-187) Under the circumstances, perhaps it would make sense not to worry too much about the ICCF Guidelines. The Commission should probably just place the decision making emphasis on the benefits and detriments to all those who will be affected by the Commission's action in this docket.

#### Benefits and Detriments:

Everyone probably agrees that there is a financial cost inherent in changing area codes, regardless of where the changes take place. Switches and PBX's must be modified and cellular sets must be reprogrammed. (TR 213) One can simply emphasize one part of the ICCF Guidelines and argue that Jacksonville should

not suffer an area code change because it is enjoying the most rapid growth of any place in the 904 area code, but there are other ways to view that situation. For example, if it costs \$15 to reprogram a cellular set (TR 213) and the number of cellular customers is growing rapidly in Jacksonville, why wait until there are many more phones to reprogram at \$15 each before making the change? Also, why shouldn't the area that is creating the most need for a change bear the greater costs for the burden that has been created by rapid growth? Finally, why wouldn't it be better to look at costs other than those that are strictly monetary?

Probably, the most significant costs and burdens that are not strictly monetary were discussed by witness Glenn W. Mayne. These are the costs of confusion, frustration and inconvenience that would be visited upon the entire population of Florida, if the area code is changed for the state capital, since state government has a significant "community of interest" with all of the rest of the millions of people in the state. (TR 137-145)

There is also a strong community of interest between Tallahassee and the Panama City LATA. Both Quincy Telephone Company and St. Joseph Telecommunications have EAS routes between the two areas. One of the prime reasons for establishing EAS is to obtain seven digit dialing, and this capability would probably be lost if the Commission chooses any plan that assigns different area codes to Tallahassee and the Panama City LATA.

Conclusion:

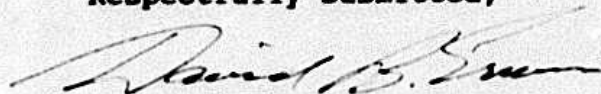
When all the competing interests are considered, perhaps the needs of state government and those served by it should be paramount, and the "Three Way Split" should be recommended.

The ICCF Guidelines can not be followed completely, regardless of which geographic split is chosen, but, at least, if the Jacksonville LATA has its own area code and Tallahassee and the rest of the panhandle keep the 904 area code, both regions will be set until 2006, and the community of interest between Tallahassee and the rest of the state will be promoted and facilitated.

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

\*\*\* The 904 area code relief should be implemented in accordance with the time table set forth in BellSouth's petition. \*\*\*

Respectfully submitted,



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**CERTIFICATE OF SERVICE  
DOCKET NO. 961153-TL**

I HEREBY CERTIFY that a copy of the foregoing revised format version has been sent by U. S. Mail or hand-delivery this 30th day of December, 1996, to the following parties of record:

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