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980048

Mr. Jack Shreve, Florida Public Counsel
111 West Madison Street - Room 812
Tallahassee, Florida 32399

Dear Mr. Shreve:

Responding to the shortage of telephone exchanges in the 813 area code, GTE announced its intention to implement an overlay plan rather than a conventional geographic split. In response to that announcement, the Florida Public Service Commission (FPSC) convened a public workshop on Thursday, January 8, 1998, in St. Petersburg and in Tampa.

GTE presented its argument in favor of the overlay method with a series of slides showing the pros and cons of both the overlay and geographic solutions. Attached is a copy of their slide presentation marked up with my notations indicating the weakness in their argument for an area code overlay. Although GTE is very serious about wanting an overlay plan, they have not demonstrated meaningful justification for not using a standard geographic split.

It is my opinion, that given GTE's fervent desire to adopt and their corresponding lack of tangible justification for such an overlay plan, that:

1. There must be some *real* reason for their insistence for *not* going along with a conventional geographic split; and
2. The genuine interest of the dialing public is *not* paramount (e.g., requiring 10 digits for all calls); and
3. The driving force behind GTE's decision is one of *profit* motivation.

Given the lack of information from GTE of just what their profit motivation might be, the only conclusion I can make is that it has to do with their very own Extended Calling Service (ECS). This is an invention of GTE that allows callers on one side of the Bay to call numbers on the other side of the Bay. Currently, callers pay a fee (\$.25 per call for residential or \$.07 per minute for business) for such calls. Generally, callers are *not* aware of when they are being charged the ECS fee. Further, the calls do not show up on the bill except buried as a lump sum along with a myriad of various tax amounts. They had promised years ago to provide subscribers with current information as to which exchanges were ECS calls and which

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN 5 _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

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specifically stated that such information would be available in the phone books, otherwise from the business office or from the operator. They have never fulfilled that promise. The telephone books are never current, the business office refers such inquiries to the operator and the operator is now in Louisville, Kentucky and has no idea of the Tampa area layout. To me this is an unfair business practice.

If the overlay plan succeeds, the ECS scheme flourishes. Callers will still not know an exchange on the other side of the Bay from one on his side. All calls would require 10 digits, calls to this side of the bay (non-ECS call) and calls to the other side (ECS calls) alike.

If the geographic plan succeeds, the ECS money machine dies and GTE loses a lot of revenue. Callers would be exposed to the fact that their calls to the other side of the Bay (ECS calls) are such, by virtue of the fact they have to dial 10 digits. Calls made to this side of the Bay would be placed using only seven digits, revealing the fact to the caller that it's a local (non-ECS) call.

Your assistance is solicited in helping us, the dialing public, prevent GTE from implementing such an overlay plan. GTE's proposed overlay plan is conspicuously *not* in our best interest. Thank you.

Sincerely,

David W. Campbell

Encl: Marked up GTE slide presentation

cc: ✓ Florida Public Service Commission
Senator Jack Latvala
Mr. Mort Bonesteel

OVERLAY

Disadvantages

- **New additional lines may get new area code.**
- **10 digit dialing on all local calls.**

REALITY CHECK: Also requires inherent confusion over which telephone numbers in the affected area have which area codes. No one in the affected area would know anyone's area code by virtue of geographical location.

REALITY CHECK: Phones, cell phones, faxes, computer and other equipment needs to be reprogrammed for speed calling for all local calls.

REALITY CHECK: All customers must change their stationery, advertisements, etc. to reflect the mandatory area code.

OVERLAY (Advantages)

- **Serves the same geographic area.**

REALITY CHECK: This is certainly no advantage to the dialing public if that same geographic area has to dial 10 digits on all calls.

- **Growth is assigned to the new NPA on a first come, first serve basis.**

REALITY CHECK: This is certainly no advantage to the dialing public. Geographic distinction is removed by assigning different area codes to same geographic area.

- **FCC requires 10 digit local dialing.**

REALITY CHECK: This is certainly no advantage to the dialing public.

GEOGRAPHICAL SPLIT

Disadvantages

- **Requires number changes for many customers**

REALITY CHECK: Requires *NO* number changes for anyone. At best it requires an area code to dial the other area – just like any other area in America.

- **Cellular phones must be reprogrammed**

REALITY CHECK: Cellular phones do not need to have speed calling reprogrammed except for calling the other area – just like any other area in America.

- **10 digit dialing across split**

REALITY CHECK: This is not a disadvantage over the overlay plan because the overlay requires 10 digit dialing everywhere, including local calls.

- **Affected customers must change stationery, advertisements, etc. to reflect new area code.**

REALITY CHECK: This is not a disadvantage over the overlay plan because the overlay requires 10 digit dialing everywhere, including local calls. The alternative (overlay plan) requires that all stationery, advertisements, etc. be changed to reflect all ten digits of all phone, cell phone, fax and computer numbers.

GEOGRAPHICAL SPLIT

Advantages

- **10 digit dialing only required when area codes differ.**
- **New additional line will always have the same area code as a customer's existing lines.**

REALITY CHECK: Additional advantage includes lack of confusion over which telephone numbers in the affected area have which area codes. Everyone will know everyone's area code by virtue of geographic location.

REALITY CHECK: Additional advantage is that no phone, cell phone, fax, computer or other equipment needs to be reprogrammed for speed calling for any local calls.

INDUSTRY DECISION

- **Implement an overlay so one-half of existing customers do not have to change their area code**

REALITY CHECK: Everybody has to reprogram cell phones, speed dialing, fax machines, computer modems, etc., so that all local calls include area code.

- **Cellular phones do not have to be reprogrammed.**

REALITY CHECK: All cell phones have to be reprogrammed to change speed dialing for all local calls from 7 digits to 10 digits.

- **All 7 digit calls will go to 10 digit calls including ECS calls**

REALITY CHECK: True