

**DAVID W. CAMPBELL**

**ORIGINAL**

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February 12, 1998

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

Dear Mr. Shreve:

Attached are my comments concerning Mr. Gancarz's direct testimony with regard to Docket No 980048-TL, filed as #01599-98 with FPSC on January 30, 1998. As you can see, in my opinion, GTE's justification for an overlay plan is near non-existent, erroneous and misleading. Please include my comments in your case 'for the people'. Thank you!

Sincerely,

David W. Campbell

Attachment: Comments to  
Docket 980048-TL  
Filing of  
Sergin J. Gancarz  
Direct testimony, 01599-98

CC: ✓ Florida Public Service Commission  
Senator Jack Latvala

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FLORIDA PUBLIC SERVICE COMMISSION

**Comments on Docket No. 980048-TL, direct testimony  
of Sergin J. Gancarz  
from GTE to the Florida Public Service Commission,  
filed January 30, 1998**

My comments are dated February 11, 1998. GTE's policy regarding the rationale for choosing the overlay plan and not a geographic split is contained on page 6 of their testimony and consists of three questions.

- A. GTE states the industry reached unanimous consensus on the overlay split because
- 1) It was most cost effective for customers, in that number changes would not be required.
  - 2) It provided the most consistent and least confusing dialing plan since ten-digit dialing would be required for the whole NPA area.
- B. GTE states the industry rejected a geographic split because
- 1) A large number of customers would be required to change their telephone numbers and incur the associated costs.
  - 2) No definable boundary could be drawn that did not involve various ten- and seven-digit dialing plans.
- C. PSC asked GTE if there would be instances in which customers have to accept lines with a different area code when adding to existing service. GTE responded
- It is possible that at some time in the future a customer would be asked to take a different area code for an additional service residing in the same building. This is a relatively unlikely possibility due to the fact that GTE Florida plans to include in number assignment the ability to make assignments in the same area code as existing services, whenever possible.

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The fallacy of GTE's testimony lies in the fact that they justify using the overlay plan because, "number changes would *not* be required" but justify not using the geographic split because, "A large number of customer *would* be required to change their telephone numbers and incur the associated costs."

**REALITY CHECK:** How can GTE say the geographic split would "require a change in telephone numbers for a large number of customers" but then say the overlay plan would "not require number changes"? No telephone number would change under either plan. With the overlay plan, *all* customers would have to dial ten digits *all* the time.

- (A.1)) On the contrary, the overlay plan is *not* the most cost effective for customers
- 1) It requires all customers to dial 10 digits on *all* calls.
  - 2) it requires all customers to reprint all stationary, business cards, etc. if it does not already contain an area code;
  - 3) it requires the customer to reprogram all telephones, cell phones, faxes, modems, commercial alarm systems, etc. for dialing and speed calling to include an area code on *all* numbers;
  - 4) it requires customers to consult a telephone directory that
    - a) contains considerably smaller print because all phone numbers must be listed with ten, not seven digits; or
    - b) a considerably heavier book because it contains much more print with all numbers being ten digits instead of all numbers being seven digits; or
    - c) both.

(A.2)) On the contrary, the overlay plan is *not* the most consistent and least confusing dialing plan.

- 1) it requires permanent confusion on the part of residents and visitors alike as to geographical location of various telephone numbers and what area code is required for local calls;
- 2) it requires users to remember the area code of every number called without regard to geographic location; and it requires a *different* area code for every phone call;
- 3) "consistent" would be a plan where all local calls are seven digits and all calls to other areas are consistently the same, based on the geographic area;
- 4) "least confusing" would be a plan where local calls don't require different area codes for different local calls.

(B.1)) On the contrary a geographic split would not require anyone to change their telephone number or incur associated costs:

- 1) No telephone numbers would change under either plan. With a geographic split a part of the area would change to a new area code;
- 2) no telephones, cell phones, fax machines, faxes, modems, commercial alarm systems, etc. would have to be reprogrammed for dialing or speed dialing to include an area code on local calls;

(B.2)) GTE's argument is that with a geographic split no definable boundaries could be drawn that did not involve various ten- and seven-digit dialing plans.

- 1) This is a smoke and mirrors tactic and not a legitimate argument;
- 2) all local calls would remain seven digits within every area code;
- 3) any plan that retains a local seven digit dialing scheme is a good plan;
- 4) boundaries can easily be drawn in our area that create two distinct areas, one with the existing 813 area code and the other with the new 727 area code. All numbers within each area remain seven digit numbers. There would be no mix of ten and seven digit number

(C) GTE's statements, "it is possible at sometime in the future ..." "This is a relatively unlikely possibility due to the fact that GTE Florida plans..." and "GTE Florida plans to include ...ability to make assignments in the same area code as existing services, whenever possible."; are indicative of our need for lack of trust of what GTE promises. GTE has lied to us in the past and there is no reason to believe they won't continue lying to us in the future.

- 1) GTE 'claims' that number assignments in the future will assure existing customers they won't be assigned multiple area codes is a pipe dream. Logically, they cannot anymore guarantee that a customer won't have to accept multiple area codes for his residence or business than it can assure customers they won't ever be confronted with a shortage of area codes
- 2) Speaking of confusion, GTI promising to keep track so that all customers have all numbers with the same area code and they'll 'reserve' area codes for such an event. With the geographic split plan, none of this would be necessary.

Respectfully submitted,

David W. Campbell  
GTE telephone customer

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