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ORIGINAL

June 12, 1998

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. 980671-TL

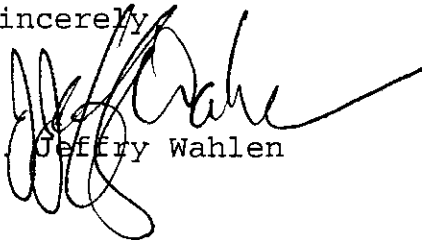
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Vista-United Telecommunications' Direct Testimony and Composite Exhibit of Robert P. Merrick.

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

- ACK
- AFA Enclosures
- APP
- CAF
- CMUC *Stramm* rpt/980671.byo
- CTR
- EAG
- LEG
- LIN *5/10/98*
- OSP
- PL
- SP
- W/S
- Y/S

RECEIVED & FILED
[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06251 JUN 12 98
FPSC - RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

ROBERT P. MERRICK

1
2
3
4
5
6 Q. Please state your name and business address.

7
8 A. My name is Robert P. Merrick. My business address is 3100
9 Bonnet Creek Road, Lake Buena Vista, Florida, 32830-0180.

10
11 Q. By whom and in what capacity are you employed?

12
13 A. I am employed by Vista-United Telecommunications ("Vista"
14 or the "Company") as Engineering and Regulated Operations
15 Manager. My responsibilities include business operations
16 and planning and network design and operation. I manage a
17 group of between 40 and 50 people whose primary function is
18 to design, install, operate and maintain equipment and
19 systems to provide telecommunication services to Vista's
20 customers. I am also a member of the Vista-United
21 Operating Committee, which is responsible for setting
22 policy, goals and strategies for the Company in the areas
23 of technology, operations and strategic planning.

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FPSC-ROCCES/REPORTING

1 Q. Please describe your educational background.

2

3 A. I was graduated from the University of Akron (Ohio) in
4 1971, with a Bachelor's of Science degree in electrical
5 engineering. From 1974 to 1978 I was employed by Florida
6 Power & Light Company as a Supervisor - Instrumentation and
7 Control. I began working at Vista in 1978 and have held
8 various positions in the engineering and operations area
9 over the past 20 years.

10 In addition to my education at the University of Akron, I
11 have obtained specialized training and education in the
12 areas of fiber and integrated optics, data communications,
13 digital transmission systems engineering, communications
14 satellite systems, personal communications systems ("PCS")
15 and asynchronous transfer mode ("ATM") switching.

16 I am a registered Florida professional engineer.

17

18 Q. Have you prepared an exhibit to accompany your direct
19 testimony?

20

21 A. Yes. Exhibit ____ (RPM-1) is a composite exhibit that was
22 compiled and prepared under my direction and supervision.

23

24 Q. What is the purpose of your testimony?

1 A. The purpose of my testimony is to describe Vista and
2 explain Vista's position on relief for the exhausting 407
3 NPA.

4

5

About Vista

6

7 Q. Please describe Vista.

8

9 A. Vista is a telecommunications company within the meaning of
10 Section 364.02(12), Florida Statutes (1997). Vista
11 provides local exchange telecommunications services to
12 customers within its commission-prescribed service
13 territory. Vista is an incumbent local exchange company
14 and is regulated by the Commission under the system of
15 price regulation in Chapter 364, Florida Statutes.

16

17 Q. Please describe Vista's service territory.

18

19 A. Vista's service territory is situated southwest of downtown
20 Orlando and consists of approximately 44 square miles in
21 Orange and Osceola Counties, Florida. As of April 30,
22 1998, Vista served a total of 16,140 access lines. Of that
23 total, 12,717 were business access lines and 1,863 were
24 residential access lines. The remainder are coin and WATS
25 lines. A map of Vista's service territory is included as

1 document 1 of my composite exhibit.

2 Vista's service territory is divided into two exchanges,
3 the Lake Buena Vista exchange and the Celebration exchange.
4 Most of our business access lines are in the Lake Buena
5 Vista exchange and most of our residential access lines
6 will be located in the Celebration exchange when
7 Celebration is built out. Vista also serves a number of
8 large resort hotels within the Lake Buena Vista exchange.

9
10 Q. Is Vista's service territory unique?

11
12 A. Yes. Vista's service territory includes a significant
13 portion of the Orlando/I-4 resort and entertainment
14 corridor ("Orlando Entertainment Corridor"). This corridor
15 extends into the service territory of BellSouth. This
16 corridor contains a variety of resort and entertainment
17 complexes, including the WALT DISNEY WORLD Resort, and is
18 unlike any other place in Florida. Indeed, the businesses
19 within the Orlando Entertainment Corridor have made central
20 Florida one of the premier travel and entertainment
21 destinations in the world. The Commission should carefully
22 consider how any proposed relief plan affects the Orlando
23 Entertainment Corridor to ensure that this unique area of
24 Florida is not disadvantaged by the relief ultimately
25 granted.

407 NPA Relief

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Q. Please describe the North American Numbering Plan.

A. The North American Numbering Plan (NANP) was introduced in 1947 by AT&T, and governs the assignment and use of telephone numbers in North America. The plan is based on a destination code in which each main telephone number in the NANP is assigned a specific address or destination code. The destination codes are commonly referred to as telephone numbers.

NANP telephone numbers are in a ten-digit format and consist of a three-digit numbering plan area ("NPA") code (also known as the area code), a three-digit central office code (usually referred to as an NXX code) and a four-digit station address code. For many years, BellCore was the NANP Administrator ("NANPA"); however, now that function is being performed by Lockheed Martin, IMS, with the approval of the North American Numbering Council ("NANC") and the Federal Communications Commission ("FCC").

Q. How does the NPA relief process work?

A. Once the NANPA identifies that NPA relief is needed,

1 members of the telecommunications industry meet with the
2 NANPA and other interested parties to discuss the
3 alternatives for relieving the exhausting NPA. The
4 alternative relief plans are evaluated in light of the
5 Industry Numbering Committee's NPA Code Relief Planning and
6 Notification Guidelines (INC 97-0404-016, issued 4/4/97,
7 hereinafter "Guidelines"). A copy of the Guidelines is
8 included in my composite exhibit as document 2.

9
10 Once all of the relief plans have been evaluated, the
11 industry group attempts to reach consensus on one of the
12 alternatives. Once consensus has been reached, the
13 recommendation is submitted to the FPSC for consideration
14 and approval. The FPSC considers the recommended plan and
15 any other presented to it and for each plan evaluates
16 competitive concerns, impacts to customers, impacts to
17 carriers and the length of area code relief.

18
19 Q. Did Vista participate in the industry meeting regarding
20 relief for the 407 NPA?

21
22 A. Yes. A member of my staff attended all of the meetings.
23 I am familiar with the meetings and have studied the
24 minutes of those meetings.

25

1 Q. What alternatives did the industry consider for the 407
2 NPA?
3
4 A. The industry considered ten alternatives for 407 NPA
5 relief. Maps showing the ten alternatives are included as
6 document 3 of my composite exhibit. A chart analyzing the
7 exhaust dates and other data for each of the ten
8 alternatives is included as document 4 of my composite
9 exhibit.
10
11 Q. What did the industry group conclude?
12
13 A. The industry agreed to eliminate alternative 2 due to the
14 extreme imbalance of projected lives of subsequent NPAs.
15 Alternative 3 was eliminated due to disruption of local
16 calling areas and lack of industry support. Alternatives
17 5, 6, 8, 9 and 10 were also eliminated for various reasons.
18 After discussing the remaining three alternatives (1, 4 and
19 7), the industry came to a consensus on alternative 1,
20 which is a single overlay for the 407 NPA.
21

1 Q. What is Vista's position on relief for the exhausting 407
2 NPA?

3

4 A. Vista believes that the FPSC should approve the alternative
5 that does the best job preserving the 407 area code for
6 existing customers, grants the longest period of NPA relief
7 and complies with the Guidelines. Doing so will advance
8 the public interest by minimizing the long term affect NPA
9 changes have on customers and carriers.

10

11 Q. Is Vista opposed to Alternative 1, the single overlay?

12

13 A. No. That plan has many advantages and should be considered
14 by the Commission along with alternatives 4 and 7. The
15 Commission should not approve Alternative 2, because it
16 would divide Vista's relatively small service territory
17 into two parts.

18

19

20 Q. Does that conclude your prepared direct testimony?

21

22 A. Yes, it does.

23

24 jjw\vst\980671.ts2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of) Docket No. 980671-TL
proposed numbering plan relief)
for the 407 area code)
_____)

Composite Exhibit
of
Robert P. Merrick

Document	Description
1	Service Territory
2	NPA Code Relief Planning and Notification Guidelines
3	Maps of Alternatives
4	Data for Alternatives

GENERAL EXCHANGE TARIFF

Vista
Docket No. 980671-TL
Exhibit __ (RPM-1)
Composite Exhibit
Document 1
Page 2 of 3

VISTA-UNITED TELECOMMUNICATIONS

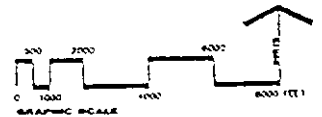
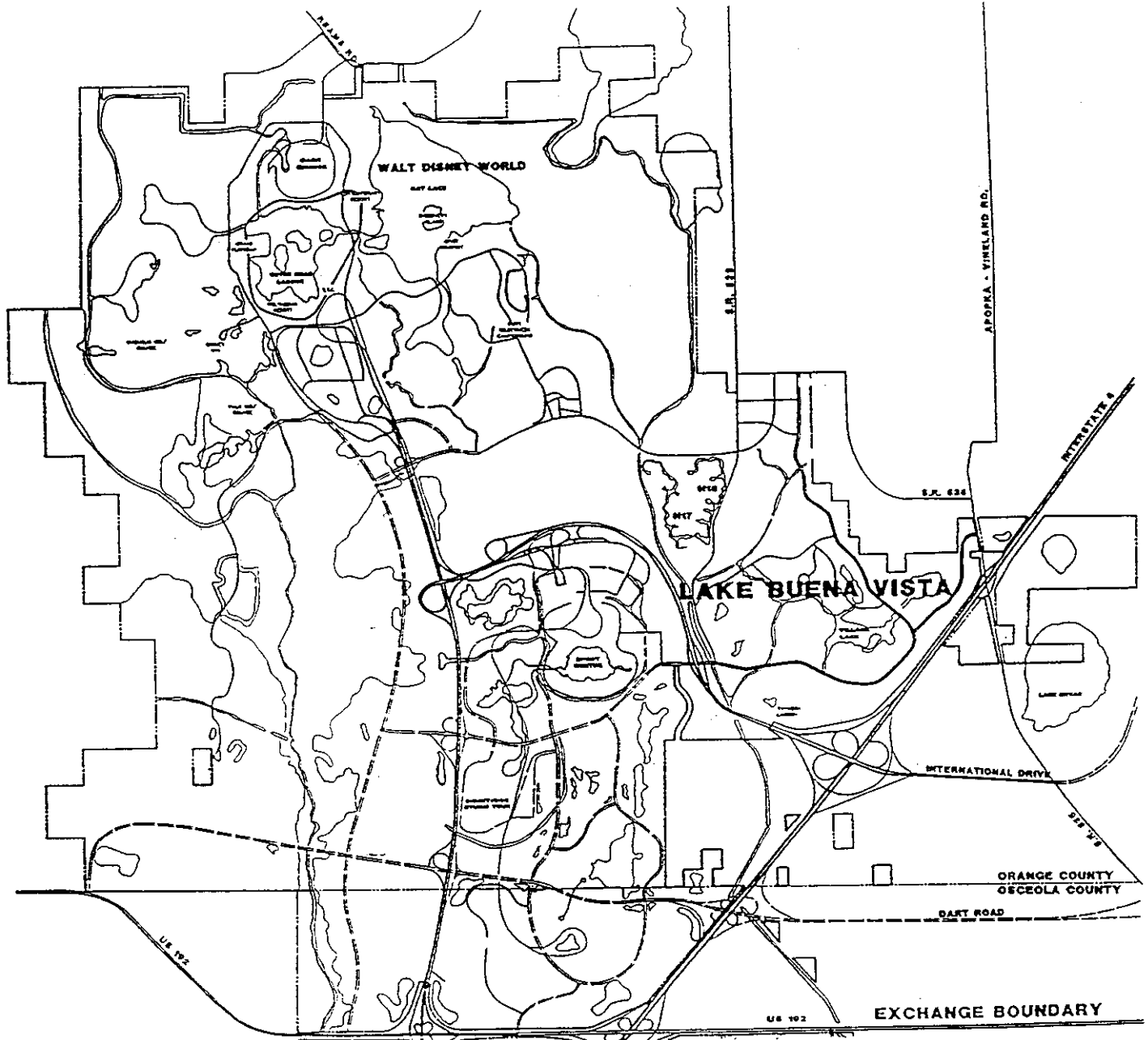
SUPPLEMENT SECTION A3
1st Revised Sheet 2
Canceling Original Sheet 2

ISSUED: April 16, 1996
BY: JAMES T. SCHUMACHER-
MANAGER, BUSINESS AFFAIRS

EFFECTIVE: May 1, 1996

EXCHANGE SERVICE AREA MAP

LAKE BUENA VISTA EXCHANGE



GENERAL EXCHANGE TARIFF

VISTA-UNITED TELECOMMUNICATIONS

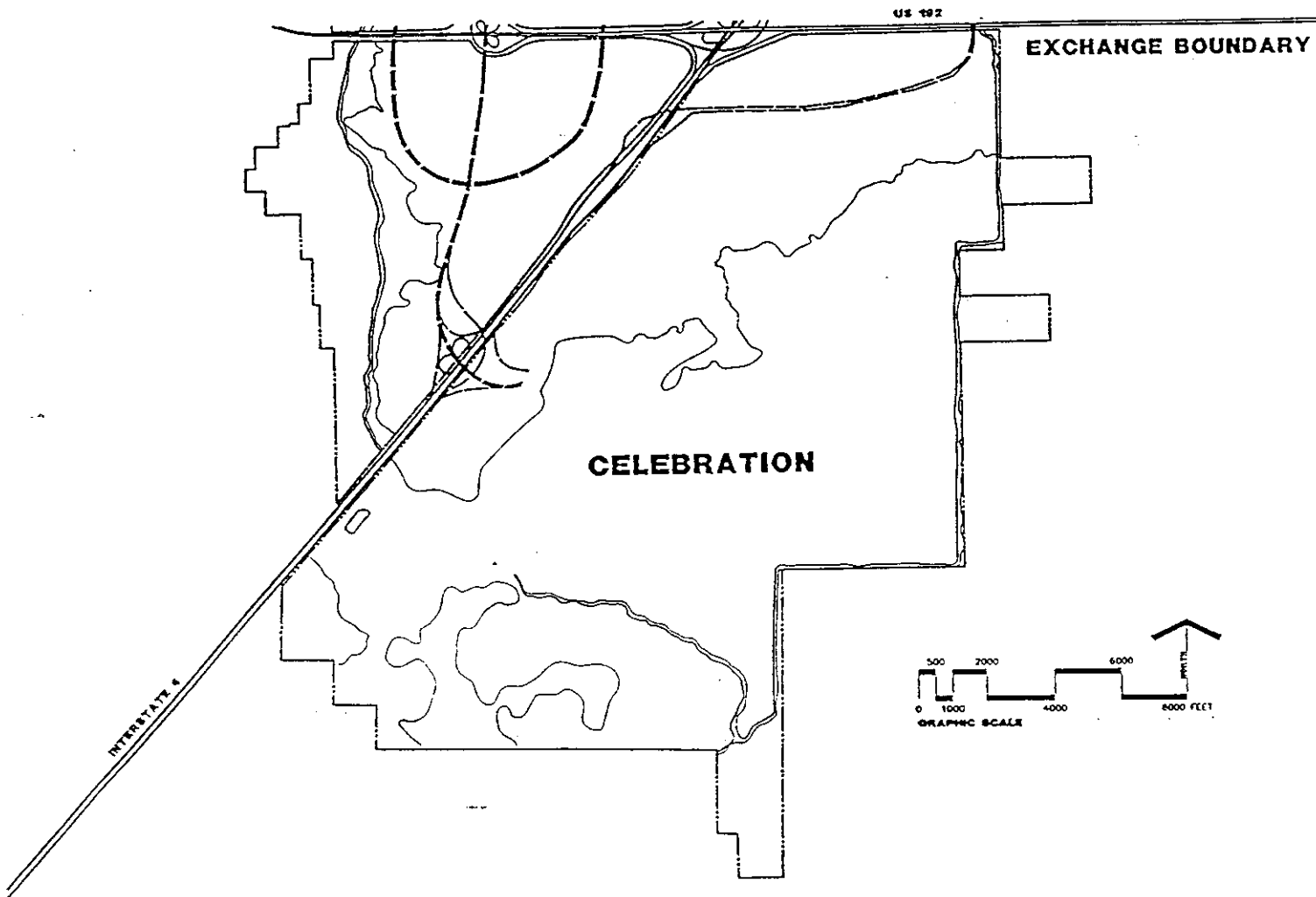
Vista
Docket No. 980671-TL
Exhibit __ (RPM-1)
Composite Exhibit
Document 1
Page 3 of 3
SUPPLEMENT SECTION A3
1st Revised Sheet 3
Canceling Original Sheet 3

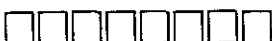
ISSUED: April 16, 1996
BY: JAMES T. SCHUMACHER-
MANAGER, BUSINESS AFFAIRS

EFFECTIVE: May 1, 1996

EXCHANGE SERVICE AREA MAP

CELEBRATION EXCHANGE





NPA Code Relief Planning and Notification Guidelines

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These guidelines are issued in resolution
to INC Issue #074.

NPA Code Relief Planning & Notification Guidelines

INC97-0404-016
Issued 4/4/97
Page 2

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 - 4.0 CO CODE ADMINISTRATORS RESPONSIBILITIES FOR CODE RELIEF PLANNING ~~(From Section 10 of CO Code Assignment Guidelines)~~
 - 5.0 NPA RELIEF PLANNING PROCESS ~~(From Section 4.0 of NPA Code Relief Planning Guidelines and Section 3 of ICCF Industry Notification of NPA Relief Activity Guidelines)~~
 - 6.0 ALTERNATIVE RELIEF METHODS ~~(From Section 5.0 of NPA Code Relief Planning Guidelines)~~
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1.0 Purpose - The purpose of this document is to provide guidelines for NPA code relief planning activities. This includes the relief planning process, industry notification process and the CO Code Administrators' responsibilities to the NPA Relief Coordinators, affected parties and applicable regulatory authorities within the North American Numbering Plan area. It also provides relief planning principles, administrative responsibilities and industry notification requirements. The steps of the NPA code relief planning process are listed and the alternative methods of providing relief and their various attributes are described.

2.0 Assumptions and Constraints - The development of these guidelines include the following assumptions and constraints:

2.1 These guidelines were intended to apply to geographic NPA relief planning only.

2.2 These guidelines were developed to facilitate and help standardize the geographic NPA relief planning process.

2.3 Relief activities will be undertaken to provide relief to an exhausting NPA. For the purpose of NPA relief planning, it is assumed that the capacity of an NPA is 792 CO codes (NXXs). However, in overlay NPA situations, the CO code exhaust capacity will be the number of NPA codes assigned to that geographic area times 792.

2.4 The relief plan chosen will seek to minimize end users' confusion while balancing the cost of implementation by all affected parties.

2.5 For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

2.6 All efforts should be made to choose a plan that does not favor a particular interest group, i.e., no carrier should receive a distinct competitive advantage over other carriers as a result of reaching a consensus on a particular plan.

2.7 It is assumed that the CO Code Administrator organization will provide the moderator for all relief planning meetings and that moderator will run meetings in a fair and impartial manner ensuring that all participants have any opportunity to express their opinions.

2.8 These relief planning guidelines were developed without making any assumption as to who will fill the role of CO Code Administrator or NANP Administrator.

2.9 CO codes and NPA codes are public resources and administrative assignment of these codes does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which the resource is assigned.

2.10 The appropriate regulatory commission (e.g., state, province, country) has the ultimate authority to approve or reject a relief plan.

2.11 In the United States, geographic NPA code boundaries do not currently extend across state lines.

2.12 Once there is a consensus/approved relief plan, all codes holders in the exhausting NPA will take the appropriate steps to facilitate the implementation of the plan.

2.13 These guidelines and all related documents/guidelines* referenced herein will be made available to all affected parties by the Relief Coordinator upon request.

3.0 NPA Relief Planning Principles - The following principles should be followed during NPA Code Relief Planning:

3.1 The NPA Code Relief Coordinator should facilitate the selection of a consensus NPA code relief alternative based upon input as outlined in Section 5 below.

3.2 Communications should be established with all affected industry members, appropriate regulatory bodies and the North American Numbering Plan Administration (NANPA). This should be initiated immediately after the need for NPA Code relief has been determined.

4. CO Code Administrators Responsibilities for Code Relief Planning - This section identifies required code relief planning functions that are related to the CO code (NXX) assignment functions as specified in these guidelines. These functions are identified because they are currently performed in conjunction with code assignment. An objective of this function is to promote effective and efficient code utilization and thereby help ensure the adequate supply of CO codes (NXXs).

The Code Administrator(s) shall be required to provide assistance in the code relief planning process when and if necessary. The output of the planning process shall be

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

made available to code holders, applicants and the industry by whatever means is appropriate.

Relief planning functions included in this section are as follows:

4.1 Tracks CO code (NXX) assignments within NPAs to ensure effective and efficient utilization of numbering resources.

4.2 Works with the Code Administrator(s) to prepare the annual CO Code Utilization Survey (COCUS) input as described in Sections 5.2.8 and 8.1 of the CO Assignment Guidelines and forwards the information to NANPA. This function includes the following activities:

4.2.1 Issues requests for, collects and compiles available information related to CO code (NXX) utilization and relief planning forecasts.

4.2.2 Investigates and resolves, wherever possible, any discrepancies in the information provided.

4.2.3 Any information released to NANPA or to the industry would be released only on an aggregated or summary basis. (See Section 8.1 of the CO Assignment Guidelines)

4.3 Projects CO code (NXX) exhaust within NPAs in order to prepare for NPA relief activity.

4.4 Develops plans for NPA relief and initiates implementation efforts, in both normal and jeopardy situations (Refer to Section 8.3 of the CO Assignment Guidelines). When the need for code relief is identified and relief activity is initiated, advises all parties affected by NPA relief activities and includes them in the planning effort.

4.5 Collects, compiles and forwards the necessary information to NANPA for the purpose of obtaining an NPA assignment when it is determined that a new NPA code is required to accommodate relief.

4.6 Obtain endorsement of NPA relief plan from appropriate regulatory authority(ies), where necessary.

4.7 Develops dialing plan alternatives within local jurisdictions.

4.8 Provides assistance to users of numbering resources and suggests alternatives, when possible, that will optimize numbering resource utilization.

4.9 Prepares and issues information related to reports for special information requests and scheduled periodic reports that relate to utilization of numbering resources.

5.0 NPA Relief Planning Process - NPA relief coordinators shall take the lead to prepare relief options for each NPA projected to exhaust within the next 5 to 10 years, in accordance with Section 3.0 above. These NPAs are identified in the Central Office Code Utilization Survey (COCUS) which is conducted annually by NANPA.

a) The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.

b) The relief options shall be a living document and reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, etc.). The annual COCUS analysis shall be used as one of the tools in updating the options.

c) The relief plan, which will evolve from these relief options, shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

d) Interested industry parties are encouraged to become involved in the development of the plan. Local regulators shall be made aware of the plan and approve, if necessary.

e) The choice of relief methods (e.g., split, overlay, boundary realignment) is a local decision and shall be specified in the plan, along with boundaries if a split is chosen. The estimated relief period shall be included in the plan along with assumptions, projected code assignment rates, etc.

f) For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

g) The use of protected codes (NXXs), which permit 7-digit dialing across NPA boundaries, should be eliminated or reduced to an absolute minimum as part of the NPA code relief planning process. Reduction or elimination of protected codes

~~should be accomplished prior to a request for a relief NPA code. 3The use of protected codes (NXXs), which permit 7 digit dialing across NPA boundaries, should be eliminated or reduced to an absolute minimum as part of the NPA code relief planning process. Reduction or elimination of protected codes should be accomplished prior to a request for a relief NPA code.~~

h) In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 15 years, shall be avoided.

Requests for relief NPA codes shall be submitted to NANPA at least 18 months prior to the NPA relief date subject to local regulatory constraints. Normally, only one code will be assigned per request unless the codes are to be introduced simultaneously or unless implementation concerns dictate a phased-in implementation of subsequent NPA(s) within two years of the relief date of the preceding relief code. The latest version of the plan, along with relevant COCUS data, shall be submitted to NANPA with the NPA request.

5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes to NXX growth demands in the future, the Relief Coordinator should project to the best of his/her ability the expected exhaust of the NPA. The Central Office Code Utilization Survey (COCUS) should be used as an aid in this projection. Consideration may be given to unforeseen but reasonable increases and/or decreases to expected growth rates which would result in an exhaust "window" rather than a specific exhaust date. Once the earliest likely exhaust date is determined, the Coordinator should establish a mandatory dialing date six to twelve months prior to that date, giving consideration to items such as busy seasons, customer service order activity, customer equipment and number changes, and any other concerns which would increase the probability for service problems during the transition period.

5.2 Identify the Alternative Relief Methods Available - Within the affected NPA, the Relief Coordinator should next identify possible NPA relief alternatives and methods from among those identified in Section 6. This may include one or more NPA Split alternatives, at least one Overlay alternative, and, where applicable, one or more NPA Boundary Realignment alternatives. Combinations of these alternatives may also be considered.

3 Per letter dated 10/29/97 from NANC Chairman to INC Moderator.

5.3 Define the Attributes of Each Alternative or Method - For each of the alternative relief methods identified in 5.2, the Coordinator should next list and quantify the impacts, using Appendix A of this document, in order to determine the advantages and disadvantages of the alternatives. Specific calculations such as the relative lengths of the relief periods, identify the impacts of dialing local calls using 7-digits or 10-digits on an industry segment basis, and the number of subscribers requiring number changes should be made at this point. Technical and operational impacts should also be identified including items such as required switch replacements and support system modifications.

5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the recommended Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an initial Planning Document for distribution to the Industry in the affected NPA. Attached to this Document should be a letter notifying Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The Relief Coordinators should also make available copies of this document, as well as other relevant documents*. Sufficient time should be provided prior to the meetings to allow individual industry members to fully analyze the alternatives from the perspectives of affects on their customers, economics and technological and operational impacts.

5.5 Conduct Industry Meetings with the Goal of Reaching Industry Consensus on a Relief Plan - Meetings and/or conference calls should be held with all interested members of the Industry within the affected NPA after each has had sufficient time to analyze the proposed alternative relief methods. The Relief Coordinator should provide a Moderator at these meetings or conference calls and be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and should be included in these discussions. Initially, separate meetings for the various industry segments may be held to increase efficiency and manageability. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be required.

In addition to discussing the alternatives, more detailed issues such as new NPA boundaries, local calling areas, regulatory issues, customer education, and the length of any necessary permissive dialing periods should be discussed.

* INC95-0407-008, Central Office Code Assignment Guidelines, ICCF 94-0726-004, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

All meetings and/or conference calls should be fully documented in meeting minutes which are to be made available to the participants prior to the subsequent meeting or call. Copies of meeting minutes may also be forwarded to the appropriate regulatory body as well as to the North American Numbering Plan Administrator.

5.6 Notify Appropriate Regulatory Body - When consensus is reached within the industry or when it appears that additional meetings would not achieve consensus, the NPA Relief Coordinator should submit to the appropriate regulatory body (or bodies) the results of the industry effort. If consensus was not obtained, the NPA Relief Coordinator may ask the regulatory body for assistance in reaching a solution. If regulatory assistance is required to adopt a "final plan", the NPA Relief Coordinator should prepare a "final recommendation" for circulation and then submit the "final plan" plus comments, if any, provided by industry participants to the appropriate regulatory body. Regulatory activities will vary by state. The Relief Coordinator should be prepared to furnish to the regulators any background information deemed necessary including the original studies, meeting minutes, mailing lists, etc. The NPA Relief Coordinator should prepare a "final recommendation" for circulation and comment by industry participants. The NPA Relief Coordinator should then submit the "final plan" plus comments, if any, provided by industry participants, to the appropriate regulatory body.

5.7 Notify the North American Numbering Plan Administration (NANPA) - When the final NPA Relief Plan has been determined, and at least 18 months prior to the NPA Relief date, the Relief Coordinator should formally notify NANPA of the pending NPA exhaust, request formal assignment of a new NPA, and submit sufficient background information to justify the assignment of a code. Normally this would include the exhaust and relief projects discussed in 5.1 and 5.3, a description of the relief method to be utilized and the relief schedule. In those situations where a final plan has not yet been developed prior to the 18-month requirement, the Planner should forward whatever information is available at that time, together with a statement that the final relief method has not yet been determined.

5.8 Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:

- factual information about the impending exhaust of the NPA
- that the telecommunications industry in the exhausting NPA will meet (time/place) to begin planning for the relief
- and that questions concerning the relief effort may be directed to the NPA Relief Coordinator (name/tel. no.)

The relief alternatives described in Section 6 may be identified as the range of possible alternatives, however, preference regarding specific relief alternatives should not be discussed.

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the Relief Coordinator, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry planning committee. Upon reaching consensus on a relief plan, a press release developed with industry input may be issued to inform the public of the industry approved plan for relief of the exhausting NPA.

If there is no industry consensus for a relief plan, the NPA Relief Coordinator may advise the public of that fact and that a final recommendation, along with written comments from industry participants have been submitted to the appropriate regulatory authority for its final disposition. Upon regulatory approval of a relief plan, the NPA Relief Coordinator will advise the public of the details of the plan. This does not preclude NANPA from issuing its standard ILs in accordance with industry guidelines for such notice (see ICCF 92-1127-006).

5.9 Public Announcement of the Relief - A minimum of 12 months advance notice of an NPA split/overlay should be provided by the NPA Relief Coordinator. This notice should include a full disclosure of the associated testing period, permissive dialing time, ANI and records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification and the date it will become available. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, new dialing procedures (if any) and a contact name and telephone number.

In addition to any other public announcements, the North American Numbering Plan Administration (NANPA) will provide 12 months advance notice to the industry via a Bellcore Information Letter. In order to do so, they must receive the required information from the NPA Relief Coordinator at least one month before the 12 month notice is to be published. The NXXs associated with the NPA relief will not be published with the NANP letter, but will continue to be published in the Local Exchange Routing Guide (LERG) at least six months in advance (to be coordinated with the quarterly issue).

Prior to the 12 month notification period, NPA Relief Coordinators are encouraged to begin informal discussions with the impacted access purchasers and other entities to provide whatever information may be available at the time regarding an NPA

split/overlay. It is recognized that planning for an NPA split involving other carriers (e.g., cellular, independents and others as appropriate) may begin earlier than this information notification.

The NPA Relief Coordinator may choose to provide a formal public notification of the planned NPA relief prior to the 12 month notice with full disclosure. To the extent that such notification is made, the NPA Relief Coordinator should inform the NANP of the announcement. Upon receipt of the information, the NANPA will issue a Bellcore Information Letter describing the proposed relief. It is recognized that this letter will typically not contain all the information to be provided with the 12 month (full disclosure) letter, but will simply alert the industry (areas served by the NANP) of the upcoming event.

6.0 Alternative Relief Methods - All of the currently identified code relief alternatives are described below. Possible impacts of these alternatives are found in Appendix B.

6.1 NPA Split Method - By this method, the exhausting NPA is split into two geographic areas leaving the existing NPA code to serve, for example, an area with the highest customer density (in order to minimize number changes) and assigning a new NPA code to the remaining area. This method divides areas by jurisdictional, natural or physical boundaries (counties, boroughs, cities, river, etc.) between the old and new NPAs.

This method has been the alternative chosen for practically all NPA relief situations prior to 1995. NPA splits have occurred with enough frequency so that technical aspects have been addressed and established implementation procedures are generally understood. Public education and acceptance of the process has been made easier because of the numerous NPA splits that have occurred. This method generally provides long term relief for an area.

6.2 Boundary Realignment Method - In an NPA boundary realignment, the NPA requiring relief is adjacent to an NPA, within the same state or province, which has spare NXX code capacity. A boundary shift occurs so that spare codes in the adjacent NPA can be used in the NPA requiring relief. As a result, the geographic area of the exhausting NPA shrinks and the geographic area of the NPA with spare capacity expands. Only the customers in the geographic area between the old and new boundaries are directly affected the this change. This method applies to multi-NPA states or provinces only. It could provide for a better balance of central office (NXX) code utilization in the affected NPAs. This method is viewed as an interim measure because it tends to provide a shorter term relief than when providing a new NPA code.

6.3 Overlay Method - An NPA overlay occurs when more than one NPA code serves the same geographic area. In an NPA overlay, code relief is provided by opening up a new NPA code within the same geographic area as the NPA(s) requiring relief. Numbers from this new NPA are assigned to new growth on a carrier neutral basis, i.e., first come, first served. Mandatory customer number changes within the affected overlay relief area are eliminated. In most cases, with the overlay relief method, 10 digit dialing is required for some of the affected customers' calling patterns. Since the overlay relief method could result in unequal dialing for those customers served out of the overlay NPA, mandatory 10 digit dialing is recommended for all NPAs covered by the NPA coincident with the implementation of an overlay.

The overlay method reduces or eliminates the need for customer number changes like those required under the split and realignment methods. It also allows the option to eliminate the permissive dialing period as part of implementation. This method will necessitate ten digit dialing of local calls between the old and new NPAs as central office (NXX) codes are implemented in the new NPA. NPAs have been previously implemented within an area and will vary with the individual characteristics of the area involved. Four potential implementation strategies have been identified for an NPA overlay. They are listed below:

6.3.1 Distributed Overlay - The distributed overlay strategy may be considered in situations when growth in telephone numbers is expected to be more or less evenly distributed throughout the existing NPA requiring relief. The new NPA is added to the NPA requiring relief and shares exactly the same geographic boundaries. When growth telephone numbers are required, they are assigned from the new NPA.

6.3.2 Concentrated Growth Overlay - A concentrated growth overlay may be considered in situations when the majority of the new telephone numbers are expected to be concentrated in one section of the existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could exist within the same NPA. The overlay NPA would be assigned initially to the section of the NPA experiencing the fastest growth, and new phone numbers in that section would be assigned from the new NPA. As more relief is required, the geographic area served by multiple NPAs could expand.

6.3.3 Boundary Extension Overlay - With a boundary extension overlay, the NPA requiring relief is adjacent to an NPA with spare capacity. The boundary between these two NPAs is eliminated, and spare NXX codes from the adjacent NPA are assigned within the original NPA boundary where relief is required. An appropriate use of boundary extension might be in a state or province consisting of two NPAs, where one NPA has spare capacity. This solution has the advantage of not requiring a new NPA

code, but it also shares some of the limitation of boundary realignment in that it provides less long term relief.

6.3.4 Multiple Overlay - The multiple overlay strategy may be considered where relief is required in two or more NPAs. For example, this solution may be appropriate in a metropolitan area where two or more NPAs cover a small geographic area and where it would be difficult to implement another kind of relief, i.e., a split or a distributed overlay. The new NPA would be assigned to overlay the multiple existing NPAs serving the entire metropolitan area. As another example, a new NPA could be assigned for new growth within an entire state or province where more than one NPA exists.

6.4 Other - A combination of the methods described above may be used. For example, a concentrated growth overlay could be assigned initially to a section of an NPA experiencing fast growth, and as more relief is required, the section served by two NPAs could expand into a distributed or multiple overlay as demand requires. Other combination of relief methods may be appropriate. Each NPA requiring relief must be analyzed on the basis of its own unique characteristics with regard to demographics, geography, regulatory climate, technological considerations and community needs and requirements.

7.0 Other Relief Planning Considerations - This section describes miscellaneous considerations which should be included during the NPA relief planning process. It is not possible to identify every potential issue which may arise when planning relief for specific NPAs; each state or province, each metropolitan area and each industry segment will have unique characteristics which could introduce concerns not included here. The following items are examples of issues which, based on past industry experiences, could create impediments to a successful and efficient implementation effort.

7.1 Organization Considerations - To the maximum extent possible, NPA relief planning should include considerations of organizational continuity. This includes not only the Administrator's own organization or entity, but continuity within the industry as well. The chances for successful implementation of relief efforts are greatly enhanced if there is smooth transition from the planning phase and continued involvement with the industry team as implementation progresses. Thorough documentation and dissemination of information throughout the planning process will assist in ensuring the desired continuity in the event personnel and/or organizational changes disrupt the transition.

7.2 Regulatory Issues - Involvement of the State Regulatory Staff during NPA code relief planning may expedite the process of addressing public policy concerns throughout the process.

7.3 Timing and Schedules - Issues related to timing and scheduling will vary with the type of relief method to be implemented as well as the level of difficulty of the required changes. In any case, the relief effort should be planned to be completed at least three months before the existing NPA would exhaust under the highest growth projections.

NPA splits require the establishment of a permissive dialing period during which calls placed to the area to be served by the new NPA can be completed whether the new or the existing NPA code is dialed by the caller. During this time, changes are made to business telephone systems, wireless devices, alarm system networks and individual subscribers' custom calling feature lists. In addition, ANI information and billing/ordering systems may be modified to handle the new NPA code. Central office codes may not be duplicated in the old and new NPAs during this time.

The length of the permissive dialing period may vary depending on the amount of time required to accomplish the above activities. Permissive dialing periods are as short as four months or as long as two years have historically been used. A decision regarding the length of the permissive dialing period, if required, must be a part of the overall Plan. When establishing transition schedules, consideration should also be given to avoiding the need to make network changes during the busiest times of the year, from the perspectives of call volumes, customer movement and holidays. Other scheduling concerns include the length and type of customer education efforts, the length of time required for network changes and overall budget considerations. The overall plan should also include a decision that determines the length of time (preferably 90 days to ensure accurate billing and prevent misdirected messages) before a central office code that has moved to the new NPA will be re-assigned in the old NPA once permissive dialing has ended.

7.4 Customer Calling Patterns - Existing and planned local calling areas should be considered during the planning process and retained, wherever practical, along with their existing or planned dialing arrangements. This may prevent regulatory policy delays during implementation and/or unexpected changes to the final plan.

7.5 Interest Group Considerations - It is difficult if not impossible during NPA relief efforts to avoid negative impacts on some customers within the NPA. Whichever alternative relief method is chosen, it is highly possible that one or more customer groups may attempt to influence the decision in a manner which is most favorable to them. Extreme care must be taken by the NPA Relief Coordinator to ensure that fair and equitable treatment is given to all subscribers within an area.

8.0 Updating the RDBS, LASS and BRIDS - At least six months prior to the NPA relief date, the NPA Relief Coordinator should make arrangements for Bellcore's Traffic Routing Administration (TRA) to update the Routing Database System (RDBS), LIDB Access Support System (LASS) and Bellcore Rating Input Database System (BRIDS)** . Notification to the industry should appear six months prior to the NPA relief date in the Local Exchange Routing Guide (LERG), which is used for message and call setup routing. Ninety days prior to the NPA relief date, the updates should appear in BRADS output products such as the NPA/NXX V&H coordinates diskette and tape. Prior to the NPA relief date, the updates should be reflected in the LIDB Access Routing Guide (LARG), which is used for Alternate Billing Service (ABS) query routing.

9.0 Routing to the New NPA Code - A test number providing an announcement that calls have reached a termination in the new NPA should be made available 4 to 6 weeks prior to the official NPA relief date and remain available throughout the entire permissive dialing period. The test number will enable all carriers and other entities to do the necessary testing to insure that the proper routing changes have been made to direct calls to the new NPA beginning on the relief date. Such changes should be made prior to the relief date, rather than after the relief date during the permissive dialing period. If customers cannot dial the new NPA code during the permissive period because some carriers were unable to complete the necessary effort on the relief date, the usefulness of the permissive dialing period is negated.

10.0 The Permissive Dialing Period - The relief date signals the start of the permissive dialing period. The permissive dialing period should precede mandatory dialing of the new NPA code. To reach a telephone in the new NPA during this time, the customer may dial either the existing NPA code and the 7 digit number or the new NPA code and the same 7 digit number.

** A recommended checklist of additional activities concerning the exchange of data/information that should be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief are found in Appendix A.

The length of the permissive dialing period is determined by the NPA Relief Coordinator. This period should allow sufficient time for customers to:

- revise printed materials (e.g., stationery, business cards, labels, bills, etc.)
- reprogram equipment that stores and analyses telephone numbers (e.g., PBXs, cellular phones, modems, speed call lists, automatic dialers)
- update directory listings
- notify customers and business associates
- change advertising (e.g., print ads, classified ads, promotional materials, etc.)

11.0 ANI and Records Conversion - ANI and records conversion should begin on or after the start of permissive dialing. ANI conversions are performed on a central office-by-central office basis and usually takes place over two or three months. It is recognized that the tasks of ANI and records conversion are complex and interdependent and that these efforts must be coordinated. Moreover, it is further recognized that records conversion can occur either before or after ANI conversion. Accordingly, for each NPA split/overlay, the time of the records conversion, whether it occurs before or after ANI conversion, will be coordinated by the NPA Relief Coordinator.

ANI conversions should not take place prior to permissive dialing in order to avoid potential problems with CLASS services.

12.0 Mandatory Dialing - The end of the permissive dialing period is the date that mandatory dialing of the new NPA code begins. All calls to both the old and new NPA codes must be dialed with the correct NPA. All misdialed calls will be intercepted by a recording and an instructional announcement will be provided.

Once the date for mandatory dialing has been established, any change which would advance that date should be made known to all parties no later than 30 days prior to the new date.

13.0 Maintenance of These Guidelines - These guidelines were developed by the NPA Code Relief Workshop of the Industry Numbering Committee (INC). Any recommended changes or modifications to these guidelines should be directed to the Industry Numbering Committee.

14.0 Glossary

ANI CONVERSION - The process by which the NPA portion of the calling party's automatic number identification (ANI) from end offices located in the new NPA changes from the old NPA to the new NPA.

COCUS – Central Office Code Utilization Survey (COCUS) is conducted annually by NANPA from direct input received from Central Office Code Administrator(s) in order to monitor central office code utilization, projected exhaust of NPAs and demand for new NPAs to provide code relief. The purpose of COCUS is to provide an annual overall view of both present and projected CO code (NNX/NXX) utilization for each NPA in the NANP.

Code Administrator — Entity(ies) responsible for the administration of the NXXs within an NPA.

Code Holder — The entity to whom a CO code (NNX/NXX) has been assigned for use at a Switching Entity or Point of Interconnection it owns or controls.

Conservation — Consideration given to the efficient and effective use of a finite numbering resource in order to minimize the cost and need to expand its availability, while at the same time allowing the maximum flexibility in the introduction of new services, capabilities and features.

Consensus — Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome of the result. Substantial agreement means more than a simple majority, but not necessarily unanimity.

Jeopardy NPA — A jeopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.— Accordingly, pending exhaust of NXX resources within an NPA does not represent a jeopardy condition if NPA relief has been or can be planned and the additional NXXs associated with the NPA will satisfy the need for new NXX codes.

Mandatory Dialing Date — The date where permissive dialing ends and the new NPA must be dialed to complete the call.

Moderator — An employee of the CO Code Administrator's organization which presides over NPA Code Relief coordination meetings. Responsibilities usually include issuing the meeting announcement, coordinating meeting arrangements, leading the meeting, issuing meeting minutes and other duties as necessary to conduct the meeting.

NANP — The North American Numbering Plan is a numbering architecture in which every station in the areas served by the NANP is identified by a unique ten-digit

address consisting of a three digit NPA code, a three digit central office code of the form NNX/NXX, and a four digit line number of the form XXXX, where N represents the digits 2-9 and X represents any digit 0-9.

NANPA — North American Numbering Plan Administration. With divestiture, key responsibilities for coordination and administration of the North American Numbering/Dialing Plans were assigned to NANPA.— These central administration functions are exercised in an impartial manner toward all industry segments while balancing the utilization of a limited resource.

NPA — Numbering Plan Area, also called an area code. —An NPA is the three digit code that occupies the A, B and C positions in the ten digit NANP format that applies throughout the areas served by the NANP. —NPAs are of the form N0/1X, where N represents the digits 2-9 and X represents any digit 0-9. After 1/1/95, NPAs will be of the form NXX. —In the NANP, NPAs are classified as either geographic or non-geographic.

A. Geographic NPAs are NPAs which correspond to discrete geographic areas served by the NANP.

B. Non-geographic NPAs are NPAs that do not correspond to discrete geographic areas, but which are instead assigned for services with attributes, functionalities or requirements that transcend specific geographic boundaries. The common examples are NPAs in the N00 format, e.g. 800.

NPA Code Relief — NPA code relief refers to an activity that must be performed when an NPA nears exhaust of its 640 NNX or the 792 NXX capacity.— Relief is typically provided to an NPA about a year before its capacity is reached. —NPA code relief for an NPA that is nearing the 640 NNX limit is usually provided in the form of implementing interchangeable central office code (ICOC) which provides an additional 152 assignable central office codes. —An NPA that has been implemented as ICOC has a capacity of 792 assignable NXX central office codes. —Providing code relief to such an NPA normally takes the form of assigning a new NPA for an NPA split or overlay. —Another option is changing the boundary of the existing NPA.

NPA Relief Coordinator — The organization responsible for the overall coordination of the NPA relief activity.

NPA Relief Date — The date by which the NPA is introduced and routing of normal commercial traffic begins.

Permissive Dialing Period - The time frame beginning with the introduction of the new NPA whereby both the old and new NPA can be dialed. The beginning of permissive dialing is coincident with the relief date and ends with the mandatory dialing date.

Premature Exhaust — (When referring to NANP): Premature exhaust means the exhaust of NANP resources (i.e., requires expansion beyond the 10 digit format) much sooner than the best industry projections. -The NANP is expected to meet the numbering needs of the telecommunications industry well into the 21st century (i.e., a minimum of 25 years). -(When referring to NPA): Premature exhaust is when a specific date for NPA relief has been established and the NPA is projected to exhaust prior to that date.

Records Conversion — The process by which all appropriate records are converted to the new NPA. -All documents that require an area code must indicate the new NPA when appropriate (e.g., access service request).

Relief Options — The relief options shall cover a period of at least five years beyond the predicted date of exhaust and shall cover more than one relief activity, if necessary, during the time frame. - The relief options shall be a living, evolving document and shall reflect changes that take place over time such as demand for NXX codes or other factors (e.g., local competition, PCS, etc.) -The annual COCUS analysis shall be used as one of the tools in updating the options.

Relief Plan — The relief plan will evolve from the relief options shall be prepared in accordance with appropriate industry guidelines, i.e., NPA Allocation Plan and Assignment Guidelines, NPA Code Relief Planning Guidelines, etc.

Service Providers — Any entity that is authorized, as appropriate, by local governmental, state, federal or governmental authorities covering areas served by the NANP to provide communications services to the public.

Testing Period — Time frame prior to permissive dialing that the new NPA will be open so that carrier and other entities can begin testing their networks.

Working Telephone — The quantity of telephone numbers within existing CO codes.

Numbers (Tns) — (NNX/NXX) which are assigned to working subscriber access lines or their equivalents, e.g., direct inward dialing trunks, paging numbers, special services, temporary local directory numbers (TLDNs), etc., within a switching entity/POI.

Appendix A

Checklist for NPA Code Relief Coordinator

The following are specific activities concerning the exchange of data/information that can be undertaken by NPA Relief Coordinators to assist in the smooth implementation of any NPA relief.

1. _____ Avoid last minute changes to data e.g., information contained in the RDBS (the source of the LERG) and BRIDS (the source of Vertical & ~~Horizontal~~Horizontal Master Data) that is directly related to NPA relief activity.
2. _____ Provide a list of LEC companies in a given NPA that are impacted by the NPA relief activity and, if known, a contact within each company.
3. _____ Specifically identify and convey any changes in trunking arrangements associated with NPA relief activities.
4. _____ Avoid NXX activation and/or changes occurring simultaneously with an NPA split or other relief activity.
- _____ If new NXXs must be activated, separately identify these codes to access purchasers as well as providing this information via the LERG.

-
5. ———Avoid Carrier ownership changes simultaneously with an NPA split or other relief activity.
 6. ———Avoid duplicating NXX codes in the old and new NPAs during the permissive dialing period as well as on the mandatory dialing date.
 7. ———NPA Relief Coordinators should include the Bellcore Traffic Routing Administration (TRA) on their distribution of NXX information associated with an NPA split or other relief activity.
 8. ———The NPA Relief Coordinator will be the point of contact for matters concerning the NPA split or other relief activity. In addition, Bellcore TRA will also be a point of contact to resolve discrepancies between NPA relief information shown in the RDBS and BRIDS products versus that provided by a given NPA Relief Coordinator.

Appendix B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered by the NPA Relief Coordinator to determine the advantages of the proposed relief alternatives.

Subscribers

- quantity of subscribers who will need number changes
- impact on CPE, e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- public reaction to and political involvement in boundary decisions
- impact on market identity/recognition, geographic identity, public familiarity
- public costs (stationary, business cards, customer premise equipment (CPE) and database reprogramming.

Network and Service Providers

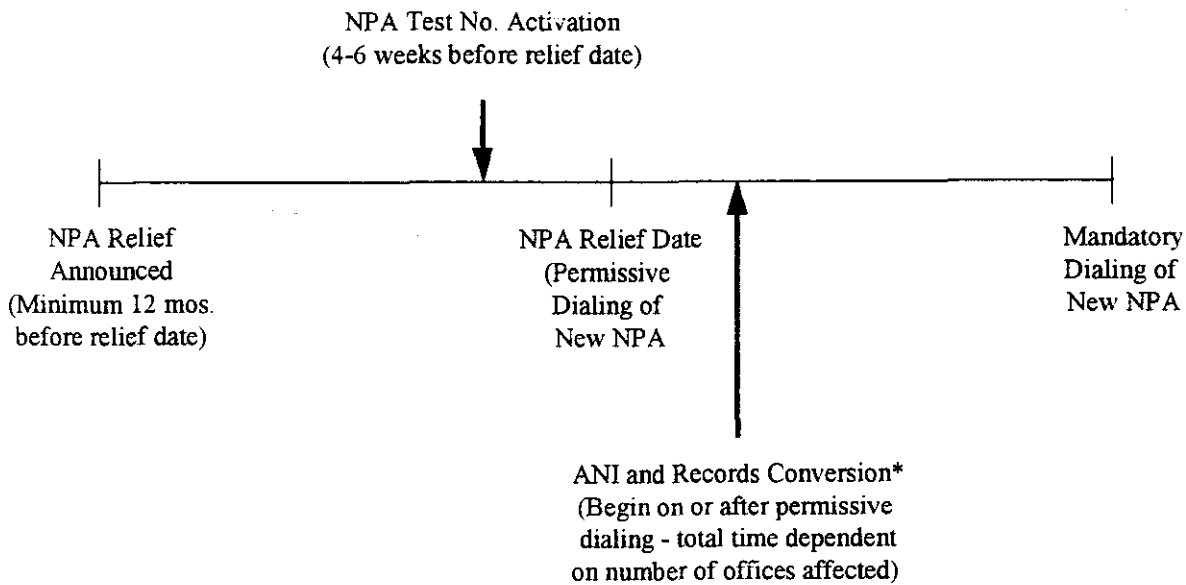
- hardware and software upgrades to switching systems
- modification to or replacement of some operating supporting systems
- modification to operator services switches and/or systems
- directory assistance impacts
- 911 system impacts
- directory changes
- public notification/education requirements
- changes to existing network routing and translations
- impact of permissive dialing period
- length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- interaction with appropriate regulatory bodies
- tariff impacts
- internal networks

Industry Concerns

- length of relief period
- NPA code utilization

Appendix C

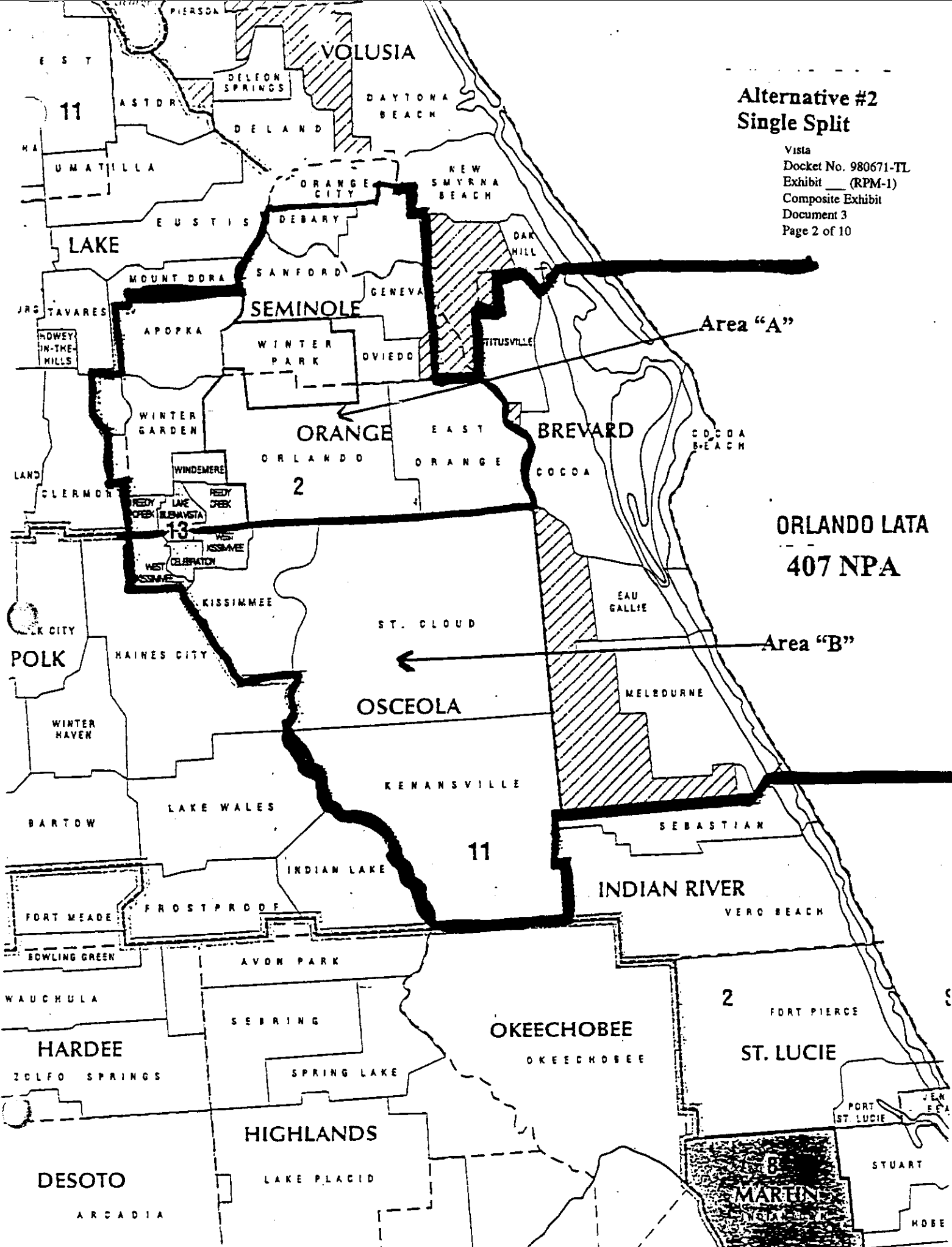
Industry Notification of NPA Relief Activity Timeline



* Records conversion may occur before or after ANI conversion

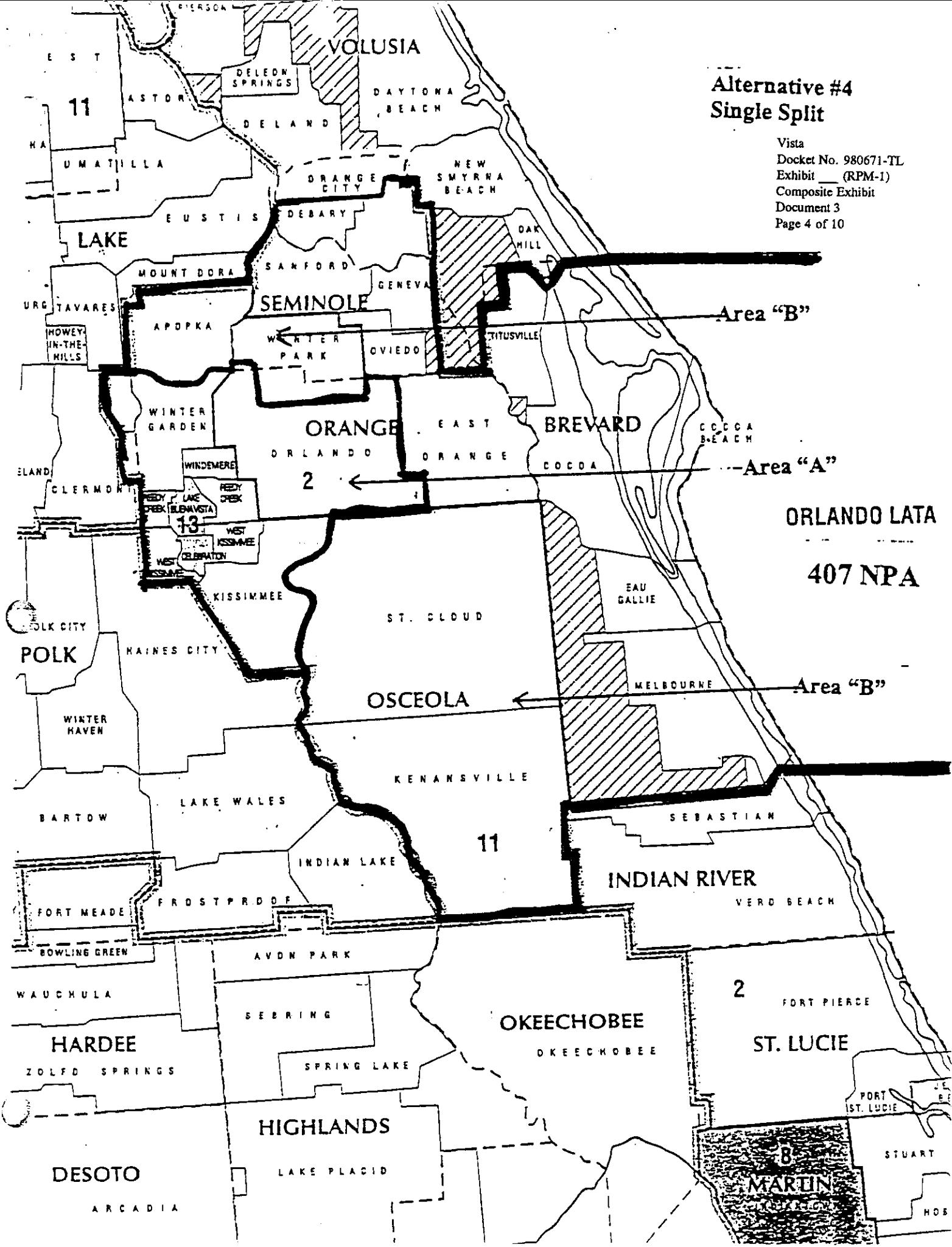
**Alternative #2
Single Split**

Vista
Docket No. 980671-TL
Exhibit __ (RPM-1)
Composite Exhibit
Document 3
Page 2 of 10



Alternative #4
Single Split

Vista
Docket No. 980671-TL
Exhibit (RPM-1)
Composite Exhibit
Document 3
Page 4 of 10



Area "B"

Area "A"

ORLANDO LATA
407 NPA

Area "B"

11

13

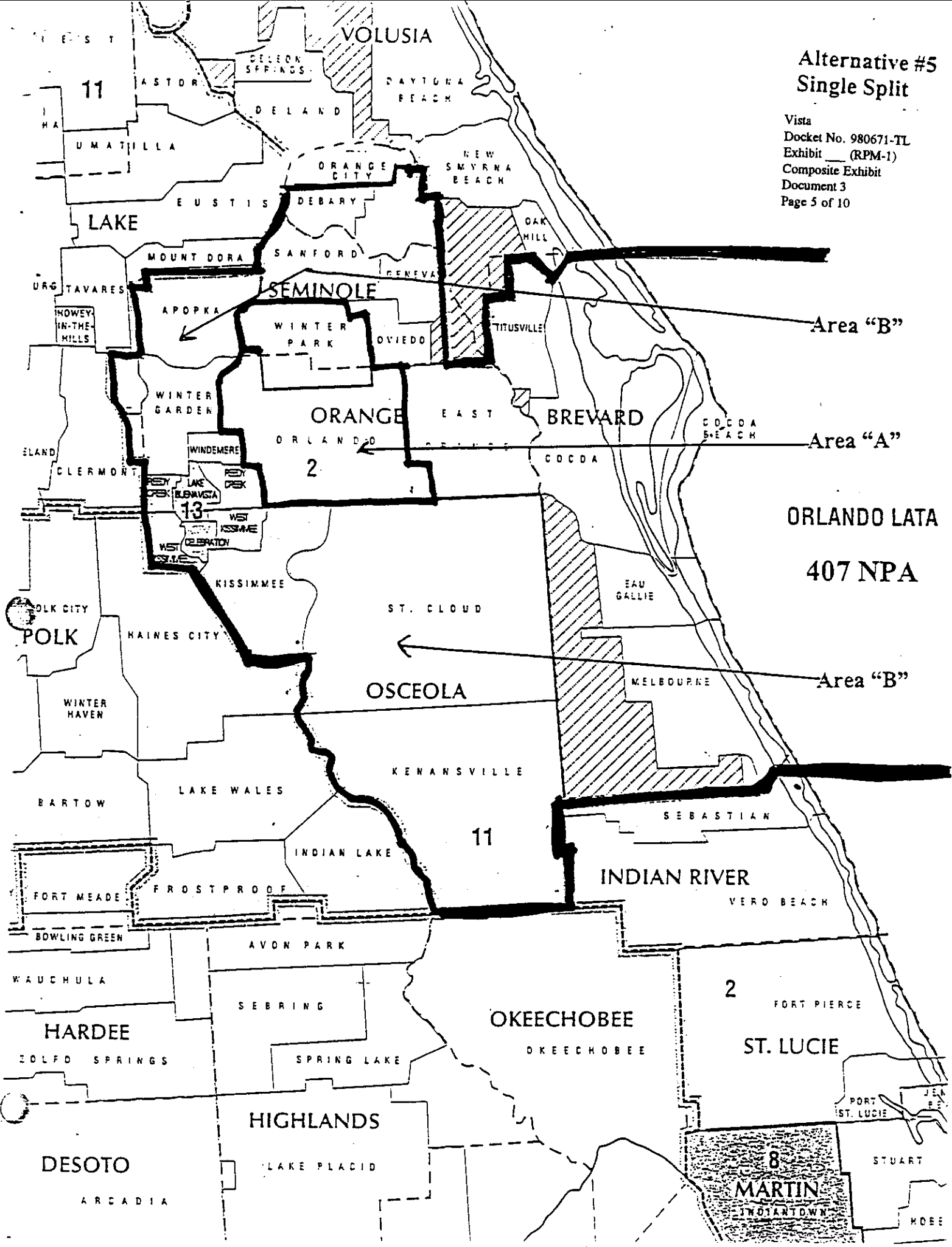
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8

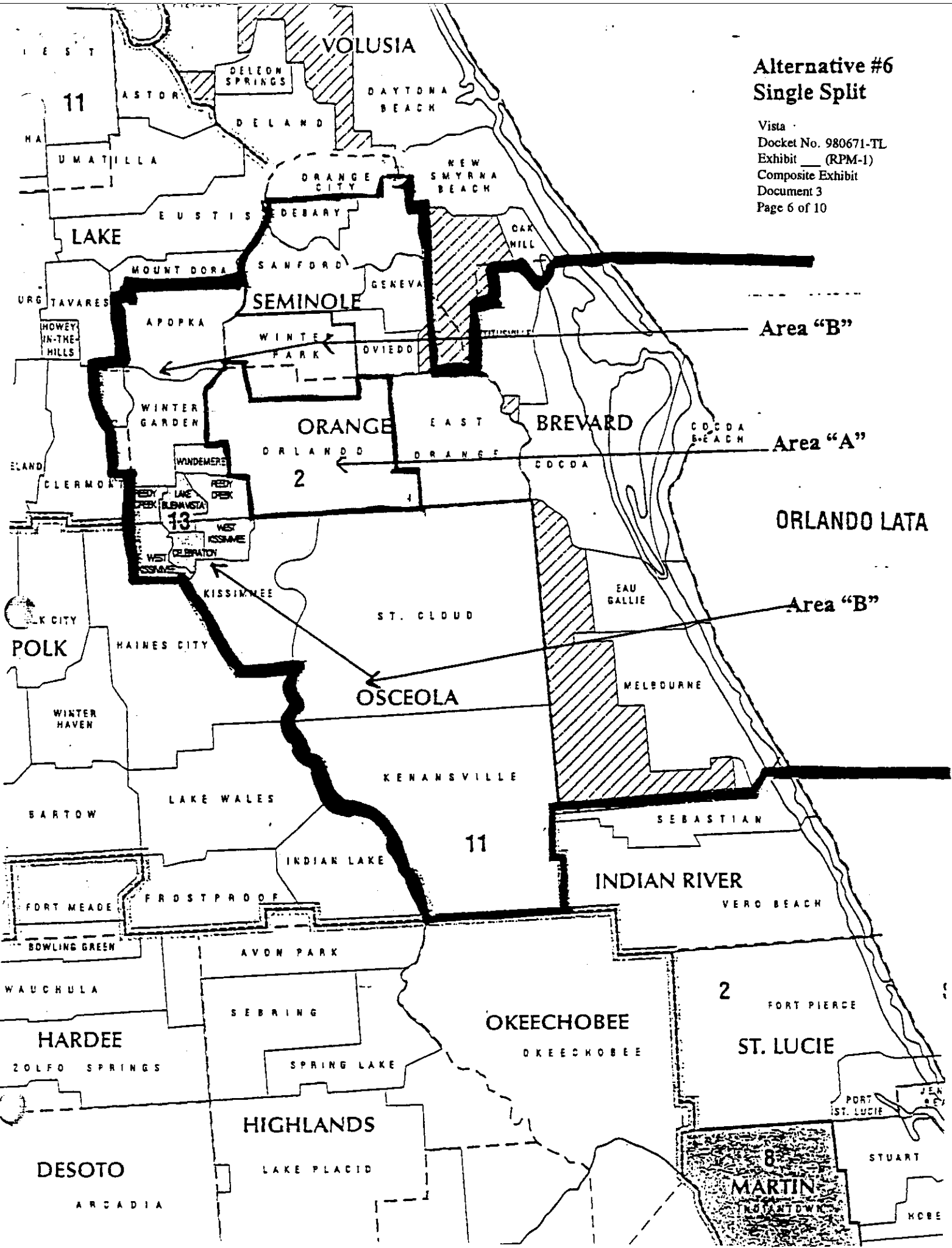
Alternative #5
Single Split

Vista
Docket No. 980671-TL
Exhibit (RPM-1)
Composite Exhibit
Document 3
Page 5 of 10



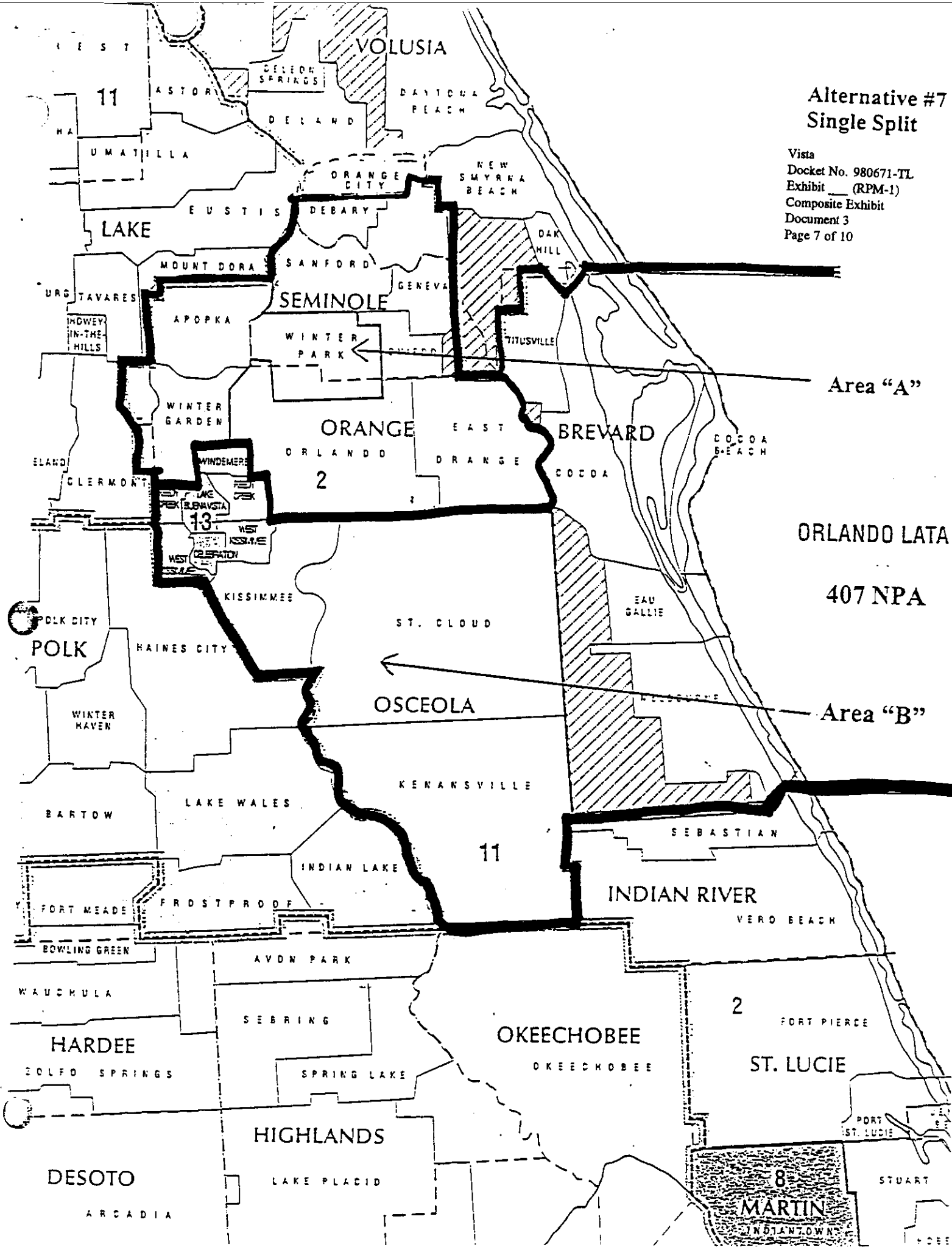
**Alternative #6
Single Split**

Vista
Docket No. 980671-TL
Exhibit __ (RPM-1)
Composite Exhibit
Document 3
Page 6 of 10



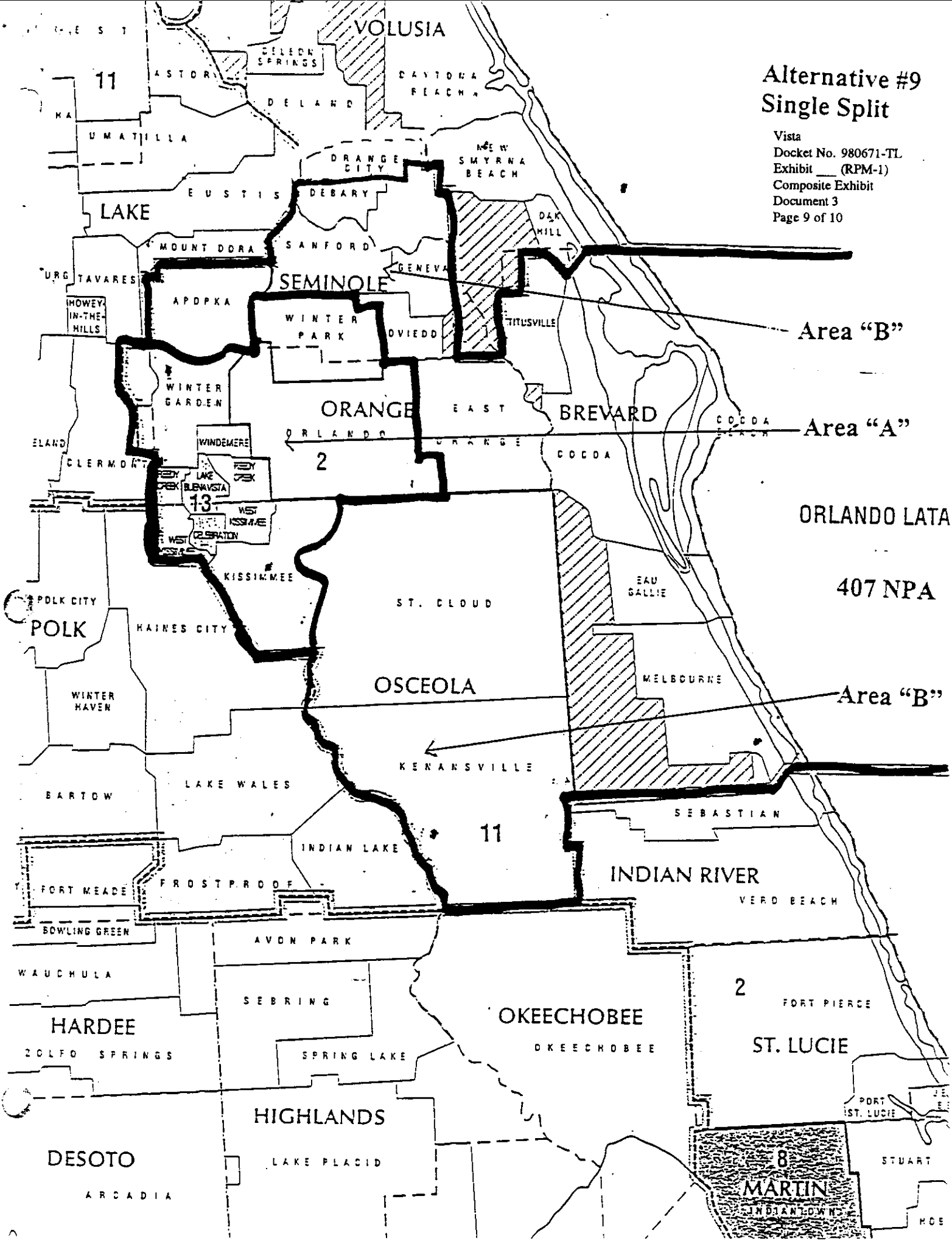
Alternative #7
Single Split

Vista
Docket No. 980671-TL
Exhibit (RPM-1)
Composite Exhibit
Document 3
Page 7 of 10



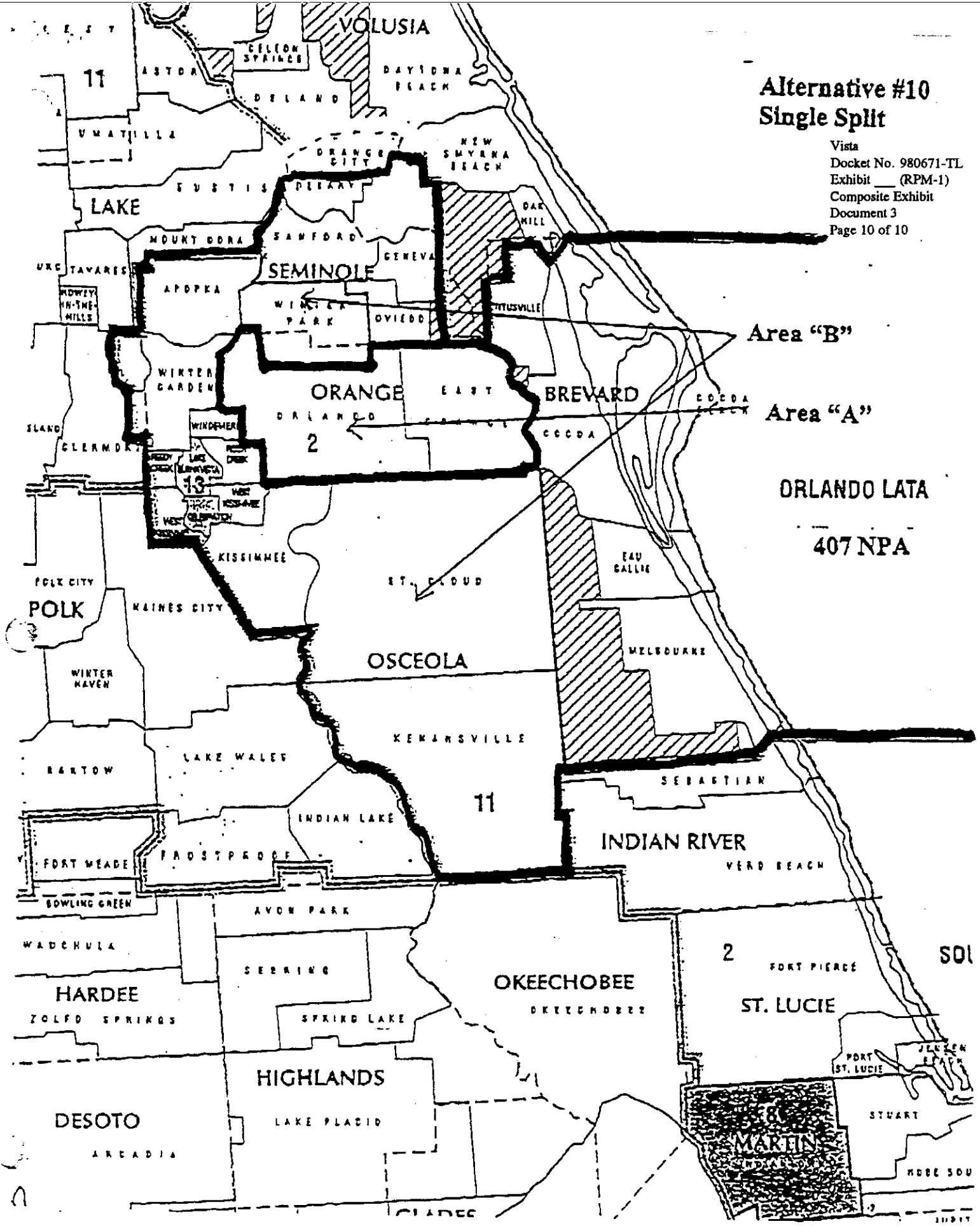
Alternative #9 Single Split

Vista
Docket No. 980671-TL
Exhibit (RPM-1)
Composite Exhibit
Document 3
Page 9 of 10



Alternative #10 Single Split

Vista
Docket No. 980671-TL
Exhibit (RPM-1)
Composite Exhibit
Document 3
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INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

			Alternative #1 Single Overlay				Alternative #2 - Single Split Area "A" = Orange & Seminole Counties				Alternative #3 - Single Split Area "A" = Orange & Osceola Counties				Alternative #4 - Single Split Area "A" = Part of Orange & Osceola				
			407 + New NPA				Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"		
			Forecasted Growth				Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	
CO Codes in Service			2Q98	At	1.25 year	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth
Wireless			3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00
RATE CENTER		Number																	
		Codes																	
ALOPKA	9		3	12	2	12	2	12	2			42	2					12	2
CELEBRATION	1		2	3	1	3	1			3	1	3	1			3	1		
COCOA	49	23	21	70	20	70	20			70	20			70	20			70	20
COCONA BEACH	10		3	13	2	13	2			13	2			13	2			13	2
DEBARY	6		2	8	1	8	1	8	1			8	1			8	1		
EAST ORANGE	4		2	6	1	6	1	6	1			6	1			6	1		
EAU GALIE	11		3	14	2	14	2			14	2			14	2			14	2
GENEVA	3		2	5	1	5	1	5	1			5	1			5	1		
KENANSVILLE	2		2	4	1	4	1			4	1	4	1			4	1		
KISSIMMEE	25	8	11	36	10	36	10			36	10	36	10			36	10		
LEEDSVILLE	7		2	9	1	9	1	9	1			9	1			9	1		
MELBOURNE	30	7	13	43	11	43	11			43	11			43	11			43	11
MONTEVERDE	3		2	5	1	5	1	5	1			5	1			5	1		
ORLANDO	196	68	88	284	87	284	87	284	87			284	87			284	87		
OVIEDO	8		3	11	2	11	2	11	2					11	2			11	2
REDFORD CREEK	6		2	8	1	8	1	8	1			8	1			8	1		
SANFORD	30	3	12	42	10	42	10	42	10					42	10			42	10
ST. CLOUD	7	1	2	9	1	9	1			9	1	9	1					9	1
TITUSVILLE	7		2	9	1	9	1			9	1			9	1			9	1
WINDERMERE	5		2	7	1	7	1	7	1			7	1			7	1		
WINTERGROUN	8		3	11	2	11	2	11	2			11	2			11	2		
WINTERPARK	89	23	37	126	34	126	34	126	34					126	34			126	34
WIKESIMMEE	10		3	13	2	13	2			13	2	13	2			13	2		
ORANGE CITY	10																		
TOTAL CODES	536	133	222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

Existing 407 NPA						Alternative #1		Alternative #2 - Single Split				Alternative #3 - Single Split				Alternative #4 - Single Split			
						Single Overlay		Area "A" = Orange & Seminole Counties		Area "A" = Orange & Osceola Counties		Area "A" = Part of Orange & Osceola							
CO Codes in Service			Forecasted Growth			407 + New NPAs		Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
		Total	Wireless	2Q98	At	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	
RATE CENTER	Codes	Codes	2Q99	Exhaust	4Q99 - 00	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth
TOTAL CODES	526	133	222	748	195	748	195	534	144	214	51	401	110	347	85	376	106	372	89
						a	b	a	b	a	b	a	b	a	b	a	b	a	b
Area Code Life Under Assumption #1																			
c Number of area codes serving the territory						2		1		1		1		1		1		1	
d Number of assignable codes in an NPA(s) (748*c)						1496		748		748		748		748		748		748	
e Number of working codes at exhaust (a)						748		534		214		401		347		376		372	
f Number of available codes for assignment (d - e)						748		214		534		347		401		372		376	
g Average forecasted code growth per year 4Q1999-2000 (b/1.25)						156		115		41		88		68		85		71	
h Area code life in years (f/g)						4.8		1.9		13.1		3.9		5.9		4.4		5.3	
Exhaust year						2005		2002		2013		2004		2006		2004		2005	
Area Code Life Under Assumption #2																			
i Number of available codes for assignment (f)						748		214		534		347		401		372		376	
j Total forecasted code growth 4Q1999-2000(b)						195		144		51		110		85		106		89	
k Number of available codes for assignment beyond 2000 (i-j)						553		70		483		237		316		266		287	
l Forecasted code growth per year beyond 2000 (g/2)						78		58		20		44		34		42		36	
m Code life in years (k/l)+1.25 years						8.3		2.5		24.9		6.6		10.5		7.5		9.3	
Exhaust year						2008		2002		2025		2006		2010		2007		2009	
Assumption #1: Code growth continues at 4Q1999-2000 levels																			
Assumption #2: Code growth reduced by 50% beyond 2000																			

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						Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split			
						Area "A" - Orlando & Winter Park Rt Ctr				Area "A" - Orlando Rate Center				Area "A" - Orange & Seminole Counties less Reedy Creek and Windermere Rate Centers			
		Forecasted Growth				Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
CO Codes in Service	Wireless	Total		1.25 year	Total		1.25 year	Total		1.25 year	Total		1.25 year	Total		1.25 year	
		2Q98	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	
		3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	
RATECENTER	Number																
	Codes																
ALBUQUA	9	3	12	2				12	2			12	2				
CELEBRATN	1	2	3	1				3	1			3	1				
COCOA	49	23	21	70	20			70	20			70	20			3	1
COCOABEACH	10		3	13	2			13	2			13	2			70	20
DELIARY	6		2	8	1			8	1			8	1			13	2
EASTORANGE	4		2	6	1			6	1			6	1	8	1		
EAU GALLIE	11		3	14	2			14	2			14	2	6	1		
GENEVA	3		2	5	1			5	1			5	1	14	2		14
KENANSVL	2		2	4	1			4	1			4	1	5	1		5
KISSIMMEE	25	8	11	36	10			36	10			36	10	4	1		4
LKUNAVIST	7		2	9	1			9	1			9	1	36	10		36
MELBOURNE	30	7	13	43	11			43	11			43	11	9	1		9
MONTVERDE	3		2	5	1			5	1			5	1	9	1		9
ORLANDO	196	68	88	284	87	284	87			284	87			43	11		43
OVIEDO	8		3	11	2			11	2			11	2	5	1		5
REEDYCREEK	6		2	8	1			8	1			8	1	284	87		284
SANFORD	30	3	12	42	10			42	10			42	10	11	2		11
ST CLOUD	7	1	2	9	1			9	1			9	1	8	1		8
TITUSVILLE	7		2	9	1			9	1			9	1	42	10		42
WINDERMERE	5		2	7	1			7	1			7	1	9	1		9
WINTERGRDN	8		3	11	2			11	2			11	2	9	1		9
WINTERPARK	89	23	37	126	34	126	34					126	34	7	1		7
WKISSIMMEE	10		3	13	2			13	2			13	2	11	2		11
ORANGECLY	10													11	2		11
TOTAL CODES	536	133	222	748	195	410	121	338	74	284	87	464	108	510	141	238	54

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Existing 407 NPA						Alternative #5 - Single Split				Alternative #6 - Single Split				Alternative #7 - Single Split			
						Area "A" - Orlando & Winter Park Rtc Ctr				Area "A" - Orlando Rate Center				Area "A" -			
CO Codes in Service			Forecasted Growth			Area "A"		Area "B"		Area "A"		Area "B"		Area "A"		Area "B"	
RATE CENTER	Total	Wireless	Total	At	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year
	Codes	Codes	2Q98	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth	At	Growth
			3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00
TOTAL CODES	526	133	222	748	195	410	121	338	74	284	87	464	108				
						a	b	a	b	a	b	a	b	a	b	a	b
Area Code Life Under Assumption #1																	
c Number of area codes serving the territory						1	1	1	1	1	1	1	1	1	1	1	1
d Number of assignable codes in an NPA(s) (748*c)						748	748	748	748	748	748	748	748	748	748	748	748
e Number of working codes at exhaust (a)						410	338	284	464	284	464	284	464	284	464	284	464
f Number of available codes for assignment (d - e)						338	410	464	284	464	284	464	284	464	284	464	284
g Average forecasted code growth per year 4Q1999-2000 (h/1.25)						97	59	70	86	70	86	70	86	70	86	70	86
h Area code life in years (f/g)						3.5	6.9	6.7	3.3	6.7	3.3	6.7	3.3	6.7	3.3	6.7	3.3
Exhaust year						2003	2007	2006	2003	2006	2003	2006	2003	2006	2003	2006	2003
Area Code Life Under Assumption #2																	
i Number of available codes for assignment (f)						338	410	464	284	464	284	464	284	464	284	464	284
j Total forecasted code growth 4Q1999-2000(b)						121	74	87	108	87	108	108	176	108	176	108	176
k Number of available codes for assignment beyond 2000 (i-j)						217	336	377	176	377	176	176	176	176	176	176	176
l Forecasted code growth per year beyond 2000 (g/2)						48	30	35	43	35	43	43	43	43	43	43	
m Code life in years (k/l) + 1.25 years						5.7	12.6	12.1	5.3	12.1	5.3	12.1	5.3	12.1	5.3	12.1	5.3
Exhaust year						2005	2012	2012	2005	2012	2005	2012	2005	2012	2005	2012	2005
Assumption #1: Code growth continues at 4Q1999-2000 levels																	
Assumption #2: Code growth reduced by 50% beyond 2000																	

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			Alternative #8					Alternative #9 - Single Split				Alternative #10 - Single Split			
			Single Overlay					Area "A" = Part of Orange & Seminole				Area "A" = Orlando & E. Orange Rate C			
			plus					(Area "A" = Alternative #4 + Winter Park)							
			Change City												
			Boundary												
			Realignment												
			407 + New NPA					Area "A"		Area "B"		Area "A"		Area "B"	
			Forecasted Growth					Total	1.25 year	Total	1.25 year	Total	1.25 year	Total	1.25 year
CO Codes in Service			2Q98	At	1.25 year	At	1.25 year	At	Growth	At	Growth	At	Growth	At	Growth
Wireless			3Q99	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00	Exhaust	4Q99 - 00
Number															
RATE CENTER		Codes													
AIPOKA	9		3	12	2	12	2			12	2			12	2
CELEBRATION	1		2	3	1	3	1	3	1					3	1
COCOA	49	23	21	70	20	70	20			70	20			70	20
COCOA BEACH	10		3	13	2	13	2			13	2			13	2
DEBARY	6		2	8	1	8	1			8	1			8	1
EAST ORANGE	4		2	6	1	6	1			6	1	6	1		
EAU GALIE	11		3	14	2	14	2			14	2			14	2
GENEVA	3		2	5	1	5	1			5	1			5	1
KENANSVILLE	2		2	4	1	4	1			4	1			4	1
KISSIMMEE	25	8	11	36	10	36	10	36	10					36	10
LEEDSBURG	7		2	9	1	9	1	9	1					9	1
MELBOURNE	30	7	13	43	11	43	11			43	11			43	11
MONTVERDE	3		2	5	1	5	1	5	1					5	1
ORLANDO	196	68	88	284	87	284	87	284	87			284	87		
OVIEDO	8		3	11	2	11	2			11	2			11	2
REEDY CREEK	6		2	8	1	8	1	8	1					8	1
SANFORD	30	3	12	42	10	42	10			42	10			42	10
ST CLOUD	7	1	2	9	1	9	1			9	1			9	1
TITUSVILLE	7		2	9	1	9	1			9	1			9	1
WINDERMERE	5		2	7	1	7	1	7	1					7	1
WINTERGROVE	8		3	11	2	11	2	11	2					11	2
WINTER PARK	89	23	37	126	34	126	34	126	34					126	34
WIKISSIMEE	10		3	13	2	13	2	13	2					13	2
ORANGE CITY	10					10	1								
TOTAL CODES	536	133	222	748	195	758	196	502	140	246	55	290	88	458	107

INITIAL PLANNING DOCUMENT FLORIDA 407 NPA ALTERNATIVES

					Alternative #1 - Single Split		Alternative #9 - Single Split				Alternative #11 - Single Split							
					Single Overlay		Area "A" - Part of Orange & Seminole				Area "A" - Ocala & NE Orange Plus C							
					Plan		(Area "A" = Alternative #1 + Winter Park)											
					Orange City													
					Boundary													
					Reassignment													
					#1 + New NPA		Area "A"		Area "B"		Area "A"		Area "B"					
					Forecasted Growth													
					Total		1.25 year		Total		1.25 year		Total		1.25 year			
CO Codes In Service					2000	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth	All Growth		
					Winter	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust	2000 Exhaust		
Location: NE NPA																		
TOTAL CODES					526	222	748	175	758	196	502	140	246	55	290	88	458	107
									a	b	a	b	a	b	a	b		
Area Code Life Under Assumption #1																		
c Number of area codes serving the territory									2		3		1		1		1	
d Number of assignable codes in an NPA(s) (748 * c)									1496		748		748		748		748	
e Number of working codes at exhaust (s)									758		502		246		290		458	
f Number of available codes for assignment (d - e)									738		246		502		458		290	
g Average forecasted code growth per year (2000-2003) (b/1.25)									157		112		44		70		86	
h Area code life in years (i/g)									4.7		2.2		11.4		6.5		3.4	
i Exhaust year									2001		2002		2011		2006		2003	
Area Code Life Under Assumption #2																		
j Number of available codes for assignment (f)									738		246		502		458		290	
k Total forecasted code growth (2000-2003) (b)									196		140		55		88		107	
l Number of available codes for assignment beyond 2000 (i - j)									542		106		447		370		183	
m Forecasted code growth per year beyond 2000 (k/3)									78		56		22		36		43	
n Code life in years (l/3) + 1.25 years									8.2		3.1		21.6		11.8		5.5	
o Exhaust year									2008		2003		2021		2012		2005	
Assumption #1: Code growth continues at 2000-2003 levels																		
Assumption #2: Code growth reduced by 50% beyond 2000																		

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 12th day of June, 1998, to the following:

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