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RECORDS AND  
REPORTING

July 6, 1998

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 980671-TL (407 Area Code)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Allen Benson, which we ask that you file in the above-captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

*Nancy B. White*  
Nancy B. White (BW)

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_ cc: All parties of record
- EAG \_\_\_\_\_ A. M. Lombardo
- LEG 1 \_\_\_\_\_ R. G. Beatty
- LIN 5 to g \_\_\_\_\_ William J. Ellenberg II
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC T \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

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RECORDS AND REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 980671-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
U.S. Mail this 6th day of July, 1998 to the following:

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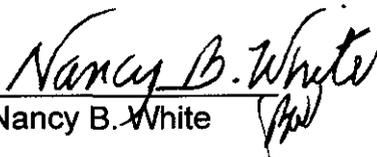
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Nancy B. White

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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF ALLEN BENSON  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 980671-TL  
JULY 6, 1998

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth" or "The Company").

A. My name is Allen Benson. I am a Manager in the Infrastructure Planning Department. My business address is 301 West Bay Street, Jacksonville, Florida.

Q. Are you the same Allen Benson that filed direct testimony in this hearing?

A. Yes, I am.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to comment on certain points put forward by MCI witness Suzanne Brooks in her direct testimony. Specifically, I will comment on number pooling and rate center consolidation.

1 Q. Witness Brooks for MCI states in her direct testimony that alternatives  
2 exist to mitigate the exhaust of the 407 NPA. Do you agree?

3

4 A. No. At this point in time, the recommendation for the use of number  
5 pooling or rate center consolidation is too premature to have any effect  
6 on the exhaust of the 407 NPA.

7

8 Rate center consolidation will require significant work on BellSouth's  
9 behalf as well as significant expenditures to change billing systems.  
10 While we have no stringent objections to an analysis of such an effort,  
11 its purpose seems vague.

12

13 BellSouth is not opposed to the institution of number pooling.  
14 BellSouth is, however, extremely opposed to studying and  
15 implementing ad hoc solutions. Currently, the number pooling issue is  
16 under study in national forums. When those studies are complete, an  
17 industry solution for number pooling will be provided. That industry  
18 solution will be the most cost effective and technologically accurate  
19 arrangement. BellSouth is participating in such forums and will abide  
20 by the industry solution. Number pooling, unfortunately, will not offer  
21 any longevity to the 407 NPA even if it were available today.

22

23 Q. Does that conclude your testimony?

24

25 A. Yes, it does.