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October 23, 1998

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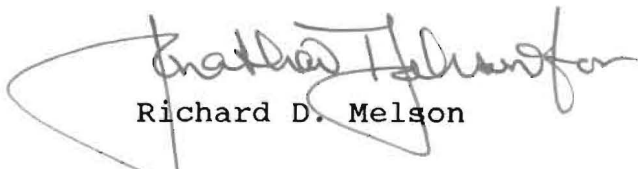
Re: 407 Area Code -- Docket No. 980671-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, "MCI") are the original and fifteen copies of its Post Hearing Brief.

By copy of this letter, this document is being furnished to the parties on the attached service list.

Very truly yours,

  
Richard D. Melson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. mail or Hand Delivery (\*) this 23rd day of October, 1998.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of            ) Docket No. 980671-TL  
Proposed numbering plan relief        )  
For 407 area code                       ) Filed: October 23, 1998

**MCI'S POST-HEARING BRIEF**

MCI Telecommunications Corporation and MCI Metro Access Transmission Services Inc. (collectively referred to as MCI) hereby file their post-hearing brief in accordance with the requirements of Order No. PSC-98-0767-PCO-TL.

ISSUE BY ISSUE ANALYSIS

Issue 1: Should the Commission approve the industry's consensus overlay plan for 407 area code relief, and if not, what relief plan should the Commission approve?

**\*\*MCI:** No. The Commission should not approve the overlay plan for the 407 area code. The Commission should approve a geographic split, specifically split alternative number 4.\*\*

Consumers in the Orlando area will experience some detrimental impact regardless of which plan the Commission selects for area code relief. But the direct impact on end users and the impact on local competition will be more severe if an overlay plan is adopted. As explained by MCI witness Brooks, the end user impacts of an overlay plan include:

- loss of all 7-digit local dialing;
- loss of the ability to associate an area code with a unique geographic area code;

- confusion resulting from different area codes assigned in the same home, business or neighborhood;
- cost to customers (throughout the overlay area) that currently use their 7-digit number for advertising, stationery and the like for new materials with their 10-digit number; and
- cost to customers (throughout the overlay area) to reprogram or replace automatic dialing systems (such as home alarm and apartment security systems and elevator emergency phones) that are currently programmed for 7 digits.

The direct impact to consumers is considerably less for a geographic split than for an overlay plan. (Brooks, Tr. 194-95, 206-07.)

Likewise, an overlay plan has a much greater detrimental impact on local competition than does a geographic split plan. The basic problem is that numbers in the existing 407 area code will be more desirable than those in the overlay area code, and the great majority of the desirable numbers already have been assigned to incumbent local exchange carriers (ILECs). Alternative local exchange carriers will be left with the less desirable numbers and thus will be put at a competitive disadvantage. (Brooks, Tr. 198A)<sup>1</sup> The FCC recognized these problems in its *Second Report and Order and Memorandum Opinion*

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<sup>1</sup> Pages 2, 4 and 6 of Ms. Brooks' prefiled rebuttal testimony were left out of the hearing transcript. MCI respectfully requests that those pages be included in the transcript as pages 197A, 198A and 199A.

and Order, CC Docket 96-98, August 8, 1996 (Second Order). The FCC noted that ILECs have an advantage over new entrants when a new code is about to be introduced because they can warehouse NXXs in the old NPA. ILECs also have an advantage when telephone numbers within NXXs within the existing area code are returned to them as their customers move or change carriers. (Second Order at ¶289)

MCI recognizes that it is now too late to prevent the need for area code relief in the Orlando area, and recommends that the Commission adopt alternative no. 4, a geographic split. In the future, however, MCI strongly recommends that the Commission investigate alternatives such as sequential number assignment, rate center consolidations and number pooling that can significantly extend the lives of area codes.

If the Commission decides to accept the overlay plan, MCI respectfully requests that the following conditions be imposed:

- ensure that permanent local number portability, where requested, on a going forward basis, meets the FCC established guidelines for implementation;
- require 10-digit dialing within and between all old and new area codes (consistent with FCC order);
- establish a workshop or other appropriate process to make recommendations to the Commission for further number conservation mechanisms.

Issue 2: What should the dialing pattern be for the following types of calls?

- a. Local

- b. Toll
- c. EAS
- d. ECS

**\*\*MCI:** Assuming the Commission approves a geographic split, 10-digit dialing should be required between the new and old area codes; toll and ECS calls should be made on a 1+ 10-digit basis; and local and EAS calls within an area code should be made on a 7-digit basis.\*\*

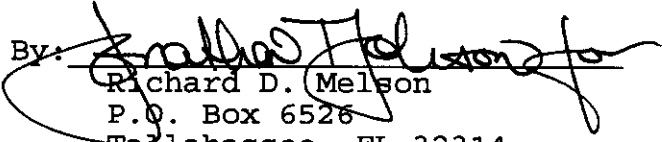
If the Commission approves a geographic split, then 10-digit dialing should be required between the new and old area codes for all types of calls. Toll and ECS calls within an area code should be made on a 1+ 10-digit basis, and local and EAS calls within an area code should be made on a 7-digit basis.

If, on the other hand, the Commission approves an overlay, 10-digit dialing should be required within and between the new and old area codes for all types of calls. In addition, toll and ECS calls should be made on a 1+ 10-digit basis.

RESPECTFULLY SUBMITTED this 23rd day of October, 1998.

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