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RECORDS AND
REPORTING

October 23, 1998

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

RE: Docket No. 980671-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Brief of the Evidence. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

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Sincerely,

MBJ
FPSC-BUREAU OF RECORDS

Mary K. Keyer
Mary K. Keyer

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg (w/o enclosures)

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RECORDS AND REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of
proposed numbering plan relief
for the 407 area code

) Docket No.: 980671-TL
)
)
)
) Filed: October 23, 1998

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I. STATEMENT OF THE CASE

Lockheed-Martin IMS ("Lockheed-Martin"), the administrator of the North American Numbering Plan ("NANP") for the 407 area code, notified the Commission by letter dated April 22, 1998, that the 407 area code will exhaust its remaining supply of telephone numbers by approximately the fourth quarter of 1999. An industry meeting regarding this issue was held on March 31, 1998. Several alternative relief plans for the 407 area code were discussed at that meeting. These plans were evaluated using the Industry Numbering Committee's NPA (Number Planning Area) Code Relief Planning and Notification Guidelines. Merrick, Tr. at p. 250, Exh. 6.

As a result of the industry meeting and discussions, the industry representatives reached a consensus recommendation for a single overlay relief plan.¹ The overlay relief plan would encompass the same geographic area as the current 407 area code. New numbers issued after the overlay plan becomes effective would receive a new area code instead of the 407 area code. MCI witness Suzanne Brooks testified in her direct and rebuttal testimony that alternatives exist to mitigate the exhaust of the 407 NPA, such as number pooling² or rate center consolidation, but admitted during the hearing that these were not viable options to the exhaust of the 407 area code. Tr. at pp. 201, 205.

¹ All but three carriers favored the consensus. Milby, Tr. at pp. 132-133.

² Number pooling is assignment of codes in blocks of 1,000 to various entities versus blocks of 10,000 as required today. Milby, Tr. at p. 131, Benson, Tr. at p. 163.

Under the overlay plan, current customers would not be required to change their area code, but would be required to dial all local calls as 10 digits within and between area codes. Lockheed-Martin has requested the Commission's approval of the industry's recommendation to implement an overlay plan for the 407 area code.

MCI Telecommunications Corporation (MCIT) and MCImetro Access Transmission Services, Inc. (MCImetro)(collectively, MCI), Vista-United Telecommunications (Vista), Sprint-Florida, Inc. (Sprint), AT&T Communications of the Southern States, Inc. (AT&T), and BellSouth Mobility Inc. (BMI) intervened in this case. Public service hearings were held on August 6, 1998, in Melbourne, and on August 7, 1998, in Orlando. A technical hearing was held on August 7, 1998, in Orlando. Due to public interest, further public service hearings were held on September 24, 1998, in Orlando, and on September 25, 1998, in Melbourne.

In addition to several individuals who testified at the public hearings and who submitted ex parte communications to the Commission, the following witnesses presented testimony at the technical hearing held August 7, 1998: Wayne Milby, Senior NPA Relief Planner for the Eastern Region of the North American Numbering Plan, presented by Lockheed-Martin; Allen Benson, Manager—Infrastructure Planning for the North Florida Area, presented by BellSouth; Suzanne Brooks, Local Numbering Group-MCI, presented by MCI; Thomas C. Foley, Project Manager, and Sandra A. Khazraee, Sr. Manager-Regulatory Affairs, presented by Sprint; and Robert P. Merrick, Engineering and

Regulated Operations Manager, presented by Vista. The technical hearing produced a transcript of 151 pages and 10 exhibits.

BellSouth submits the following brief in accordance with the post-hearing procedures of Rule 25-22.056, Florida Administrative Code. The statement of the issues identified in this matter is followed immediately by a summary of BellSouth's position marked by an asterisk and a discussion of the basis of BellSouth's position.

II. STATEMENT OF BASIC POSITION

The issues in this case are (1) whether the Commission should approve the industry's consensus recommendation of a single overlay plan for the 407 area code relief, and if not, what relief plan should the Commission approve, and (2) what should the dialing pattern be for local, toll, EAS, and ECS calls. Based on the testimony submitted at the hearing, BellSouth supports the single overlay plan as the best and most appropriate plan for 407 area code relief, and states 10-digit dialing would be appropriate as indicated below.

III. POSITION ON INDIVIDUAL ISSUE

Issue 1: Should the Commission approve the industry's Consensus Overlay Plan for the 407 Area Code Relief, and if not, what relief plan should the Commission approve?

* **Position:** Yes. The overlay plan is the most cost effective, most consistent and least confusing dialing arrangement, as well as being the easiest to implement and the one which will provide the longest NPA relief period for all

customers. Alternatively, BellSouth supports a geographic split as set forth in Alternative #7.

BellSouth supports the overlay plan for several reasons: it is the most cost effective, it would provide the longest relief period for all customers, it would provide the most consistent and least confusing dialing arrangement since 10-digit dialing would be required for the whole area, which would also ensure dialing parity among all communications users and providers, it is the easiest to implement from both a technical and customer education perspective, and it establishes a pattern for future growth. Benson, Tr. at pp. 150-151, 157.

Customers would not be required to change their telephone numbers with the overlay plan, making it the most economical solution for them. Benson, Tr. at p. 157, Foley, Tr. at p. 230. Because customers will not have to change their numbers, they will not have to incur the costs associated with a number change, such as reissuing letterhead, business cards, advertising, etc.

The overlay plan would also provide the longest relief period for all customers. Benson, Tr. at p. 150. The future exhaust date for the overlay is estimated at 2005. Foley, Tr. at p. 232. The future exhaust dates for the 407 and the new area codes using a low growth assumption under Alternative #7 are 2003 and 2022 respectively. Benson, Tr. at p. 151. Osceola and Brevard Counties are, however, more suited to inclusion in a high growth assumption, therefore, the exhaust dates for the 407 and new area codes using a high growth assumption under Alternative #7 are 2002 and 2012 respectively, while the

future exhaust dates for Alternative #4 for the 407 and new area code areas are 2004 and 2005 respectively. Benson, Tr. at p. 152, Foley, Tr. at 232.

If an alternative other than the overlay plan is selected for the 407 area code relief plan, the Commission will have to address this issue again at the conclusion of these exhaust dates. If, however, the overlay plan is selected, there will be no need for this process to be held nor will there be a need for a transitory period for implementation as required of the other alternatives. Foley, Tr. at p. 233.

Although the overlay plan requires 10-digit dialing, both consistency and parity in the dialing pattern would be achieved because all customers would have 10-digit dialing as compared to a geographic split in which some routes would require 10-digit dialing while others would not. The 10-digit dialing would also be least confusing to customers because all numbers would require 10-digit dialing. Moreover, as the area continues to grow, which BellSouth believes it will, a 10-digit dialing pattern established now will prepare customers for the anticipated growth. Benson, Tr. at pp. 158-159. Ten-digit dialing is not a new concept, but was recommended for all local dialing in 1993, by Bellcore, the North American Numbering Plan (NANP) Administrator. Foley, Tr. at pp. 234-235. For the reasons stated above, the Commission should adopt the overlay plan.

Should the Commission decide not to approve the overlay plan, however, BellSouth recommends Alternative #7 as the next best relief solution for the 407 area code exhaust problem because this alternative would be the least disruptive of the geographic split plans to the local communities of interest.

Benson, Tr. at pp. 151, 158, 186-187. Alternative #7 represents a single geographic split as shown in Exhibit 3, page __ and Exhibit 5. The split would incorporate Seminole and Orange Counties, less Windermere, Reedy Creek, and Lake Buena Vista rate centers, into one area, Area A, and the remaining area into Area B. Milby, Tr. at p. 20, Foley, Tr. at 228, Exhs. 5 and 6.

Utilizing this alternative, the Commission would be able to maintain 7-digit dialing for what is perceived to be the highest community of interest, Orange and Seminole Counties, and would be required to change fewer NXX codes than Alternative #4, for example, which is supported by MCI. Benson, Tr. at p. 152, Brooks, Tr. at 207. Witness Brooks testified MCI supports Alternative #4 because MCI assigns its NXX codes by rate center and she believes Alternative #7's boundary splits would force MCI's customers to change their numbers. Tr. at pp. 207-208. MCI's position is without merit. None of the alternatives, including Alternative #7, splits rate centers because of the "severe impacts that it would have." Foley, Tr. at p. 133. Therefore, MCI's concerns with Alternative #7 are without basis. In reality, Benson testified the number of NXX codes required to be changed with Alternative #7 would be 238 as compared to 372 NXX codes that would have to be changed with Alternative #4. Tr. at p. 152. Additionally, BellSouth examined the commuting information between counties and the amount of trunking that would be affected under Alternative #7 versus Alternative #4. Benson discovered a "significantly smaller amount of cross NPA calling according to the amount of trunking" would be affected under Alternative #7 than under Alternative #4. Benson, Tr. at pp. 158, 186-187, Exh. 7. In

Alternative #7, which provides a split between Orange and Osceola Counties, there are 3,500 trunks between those counties versus 13,000 trunks between Orlando and Winter Park, which would be affected if Alternative #4 were selected. Benson, Tr. at pp. 159, 186-187.

This trunking information provides clear evidence that there is a "much stronger community of interest between Orange and Seminole County than there is between Orange and Osceola County." Benson, Tr. at p. 187. Therefore, because there are a "much larger number of trunks tying in a similar area to Orlando than trunks tying in Osceola County," there would be a "significantly smaller impact on the community of interest" under Alternative #7. Benson, Tr. at p. 187.

Although Alternative #7 is fairly similar to Alternative #2, it does not split the Vista territory, as does Alternative #2, and it balances the future exhaust dates slightly better than Alternative #2. Benson, Tr. at p. 188, Merrick, Tr. at p. 252, Exh. 5.

In implementing a relief plan, BellSouth believes it is important to minimize the impact of an NPA exhaust on all communications customers to the extent possible. Based on the evidence, Alternative #7 would be less disruptive than Alternative #4 or the other geographic split alternatives considered,³ and would provide the requisite minimal impact on customers in the affected areas.

³ Alternative 2 was eliminated by the industry due to extreme imbalances of projected lives of subsequent NPAs, Alternative 3 was eliminated due to disruption of local calling areas and lack of industry support, and Alternatives 5, 6, 8, 9 and 10 were eliminated for various reasons. Merrick, Tr. at p. 251.

Issue 2: What should the dialing pattern be for the following types of calls? a. Local b. Toll c. EAS d. ECS.

* **Position:** A 10-digit dialing pattern is mandatory for local and EAS calls with the overlay solution, and should also apply to ECS calls where interexchange carrier competition is not allowed. A 1+ 10-digit dialing pattern should apply to all toll calls and those ECS calls subject to allowable interexchange carrier competition.

BellSouth supports the 10-digit dialing pattern outlined above for the overlay plan because it would help ensure dialing parity among all communications users and providers. Benson, Tr. at p. 151. Furthermore, in Commission Order No. PSC-96-0558-FOS-TP, issued April 25, 1996, (Order) this Commission mandated certain 10-digit or 1+ 10-digit dialing patterns for intra exchange local traffic, inter and intra NPA EAS traffic, inter and intra NPA ECS or alternative toll plan, and inter and intra NPA toll traffic in specified areas. In its Order, the Commission noted that "this dialing pattern is consistent with the move toward 10-digit dialing for all local traffic." The 10-digit dialing patterns referred to herein would begin the transition to the dialing patterns mandated in that Order.

If Alternative #7 were selected by the Commission as the relief plan to be implemented, no change in dialing patterns will be required unless EAS exists between communities where one EAS point is included in the new area code and the other point remains in the 407 area. Benson, Tr. at p. 152. Alternative

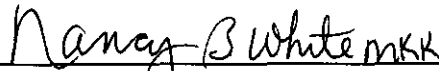
#7 would preserve 7-digit dialing between the two counties with the greatest community of interest, as stated above. Benson, Tr. at p. 152.

IV. CONCLUSION


For all the reasons stated herein, BellSouth respectfully requests the Commission approve the industry's consensus overlay plan for the 407 area code relief and implement 10-digit dialing for local and EAS calls and for ECS calls where interexchange carrier competition is not allowed, and 1+ 10-digit dialing for all tolls calls and those ECS calls subject to allowable interexchange carrier competition.

Respectfully submitted this 23rd day of October, 1998.

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Docket No. 980671-TL**

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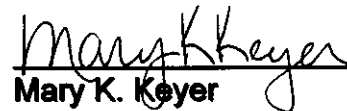
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