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ORIGINAL

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March 18, 1999

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

RECEIVED-FPSC  
99 MAR 18 PM 4:12  
RECORDS AND  
REPORTING

RE: Docket 990223-TL

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Direct Testimony of Thomas C. Foley.

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,

Charles J. Rehwinkel

CJR/bs

Enclosures

cc: All parties of record

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
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03579 MAR 18 99

FPSC-RECORDS/REPORTING

ORIGINAL

1                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2                                   DIRECT TESTIMONY

3   OF

4   THOMAS C. FOLEY

5  
6           Q.    Please state your name and business address.

7  
8           A.    My name is Thomas C. Foley. My business address is:

9  
10                                   Sprint

11                                   MC FLAPKA0303

12                                   555 Lake Border Drive

13                                   Apopka, Florida 32703

14  
15           Q.    Please detail your educational background and  
16                   professional experience in the telecommunications  
17                   industry.

18  
19           A.    I hold a Bachelors Degree in Electrical Engineering from  
20                   the University of Nebraska - Lincoln and a Masters of  
21                   Business Administration form Roosevelt University,  
22                   Chicago. I also have a Masters Certificate in Project  
23                   Management from George Washington University. I have  
24                   attended numerous industry schools and forums on  
25                   engineering, management, and project management.

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1 I have been employed in the telecommunications industry;  
2 with Sprint and its predecessor companies and  
3 subsidiaries, for twenty-six years.

4  
5 I have held positions in Engineering, Strategic Market  
6 Planning, Technology Planning, and Operations. I have  
7 held such positions as Manager of Budgets and  
8 Forecasting, District Manager, and Project Manager. In  
9 my current position with Sprint, I manage large, complex  
10 interdepartmental projects such as NPA relief activities.  
11 I have project managed Sprint's activities for NPA relief  
12 since 1988, including the implementation of  
13 interchangeable NPA/NXX Codes.

14

15 Additionally, I enjoy the privilege of being a member of  
16 the faculty at the University of Phoenix where I teach  
17 mathematics, statistics, project management, and general  
18 management courses at both the undergraduate and graduate  
19 level.

20

21 Q. What is the purpose of your testimony?

22

23 A. The purpose of my testimony is to provide information on  
24 the need for relief of the 941 Number Planning Area  
25 (NPA), the various plans available for this relief, and

1 the activities that have occurred to that end, to date.

2

3 Q. What conditions have led to the situation where relief is  
4 needed for the 941 NPA?

5

6 A. NPA exhaust occurs when the demand for NXX or exchange  
7 codes exceeds the limited supply. Each NPA has only 792  
8 assignable NXX codes. This number is further diminished  
9 by the need to "protect" codes to prevent dialing  
10 conflicts in the network. Other NXX codes are not used  
11 to prevent the duplication of NXX codes and NPA codes in  
12 a customer's telephone number, both in the existing NPA  
13 code needing relief and surrounding NPAs whenever  
14 possible. The remaining codes are available to meet the  
15 demands of customers on the telecommunication networks.

16

17 Several factors have led to the increasing demand on the  
18 use of the remaining NXX codes. The changes in  
19 technology and lifestyle at a consumer level have placed  
20 a demand for additional telephone numbers. The  
21 population growth in the area, the easy and inexpensive  
22 acquisition of fax machines with separate lines, personal  
23 pagers, additional lines in residences and businesses for  
24 computer modems, second (and third) "teen" lines, and the  
25 proliferation of cellular and other wireless services all

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contribute to the need for numbers.

In addition, the entrance into the market by competitors who each require number resources diminishes further the number of available NXX codes in an NPA. NXX codes are blocks of 10,000 numbers and are assigned to a telecommunications provider only as a block. As an example, if there are 5,000 customers in an area and six telecommunications providers: two wireline local exchange carriers, two paging companies, and two cellular companies, 60,000 numbers would be assigned to these six telecommunications companies to provide service to these 5,000 consumers. If there are more entrants into the market, additional numbering resources would be assigned for those consumers.

Q. Will the implementation of Local Number Portability alleviate the problems you just described?

A. Only partially. Portability will not do anything for the numbers of different services and the quantities of services that consumers purchase. Portability will allow for greater efficiencies in the use of numbers within an NXX and between telecommunication companies offering similar services. Each new Local Exchange Carrier would

1 require at least one new NXX code.

2

3 With local number portability, the technology is  
4 available to provide what is called, nationally,  
5 thousands block pooling. This thousands block pooling,  
6 when implemented nationally, will allow, the assignment  
7 of numbering resources in 1,000 number blocks rather than  
8 10,000 numbers at a time. This technology is not yet  
9 available for implementation in the Southeast United  
10 States. Trials are currently being conducted in the  
11 Chicago, Illinois area.

12

13 Q. What options are available to the telecommunications  
14 industry to provide relief to NPAs in general, and  
15 specifically, the 941 NPA in the Southwest Florida area?

16

17 A. There are three basic methods of providing relief to an  
18 NPA. There is 1) the geographic split, 2) the overlay,  
19 and 3) the boundary realignment. These three options,  
20 and combinations of these options, were reviewed at an  
21 Industry meeting held in Tampa, Florida July 8, 1998.  
22 This industry meeting was attended by some 15 individuals  
23 from all segments of the telecommunication industry and  
24 the Florida Public Service Commission. It was organized  
25 and chaired by a representative of the North American

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Numbering Plan Administration (NANPA).

On March 15, 1999, the Florida Public Service Commission Staff forwarded additional proposed relief plans to Sprint. Sprint has not had sufficient opportunity to study fully the effects and ramifications of all these new proposals. Sprint believes additional testimony may be needed.

Q. Can you identify the attendees at the July 1998 meeting?

A. The list of those companies and individuals invited, along with those who attended, were included in the August 14, 1998 letter (Exhibit 1) from NANPA to the Florida Public Service Commission. This list is included in Exhibit 1.

Q. What are the advantages and disadvantages of each of the three basic methods for NPA relief in general and, specifically, for the 941 NPA?

A. The advantages of the traditional geographic NPA split include:  
1. This is the traditional way relief has been provided in previous years.

- 1           2.    The geographic split divides an existing NPA  
2                    mostly along geographic boundaries such as a  
3                    county lines, rivers, roads, or highways. This  
4                    method leaves both the old and new NPAs  
5                    identifiable, geographically.
- 6           3.    The customers 7-digit portion of their telephone  
7                    number remains the same.
- 8           4.    The customers who remain with the existing area  
9                    code, will not undergo an area code change.

10

11           The disadvantages to the geographic split are:

- 12           1.    Existing 7-digit dialing across the new NPA  
13                    boundary will be converted to 10-digit dialing.
- 14           2.    The geographic split does require about half of  
15                    the incumbent subscribers to change the area code  
16                    portion of the telephone number. These changes  
17                    are sometimes seen as very costly to the affected  
18                    customers.
- 19           3.    Wireless Carriers are affected by geographic NPA  
20                    Splits because they require access to each  
21                    customer's instrument to reprogram the telephone  
22                    number.
- 23           4.    With a geographic split, at some point in the  
24                    future, customers will be directly affected by  
25                    additional relief activities.



1 The overlay method basically places two or more NPAs  
2 within the same geographic area. Future growth of NXX  
3 codes will be available from the new NPA and from the  
4 remaining vacant NXX codes in the existing NPA.

5

6 Advantages to the overlay method include:

- 7 1. This method does not generally require any customer  
8 to change their Area Code or the 7-digit portion of  
9 their telephone number. These existing customers  
10 will forgo the expense associated with a number  
11 change.
- 12 2. The overlay is relatively easy, from the  
13 telecommunications network perspective to  
14 implement.
- 15 3. After the initial NPA overlay code is employed,  
16 additional relief for the area using another  
17 overlay NPA code will have minimal impact on  
18 customers.

19

20 The disadvantage to the overlay method is that customers  
21 will have to dial ten-digits for all local calls.  
22 However, eventually, all local calls will require ten-  
23 digit dialing.

24

25 In a boundary realignment one or more surrounding NPAs

1           that have an abundance of available NXX codes are  
2           adjusted to absorb some of the current NPA's subscribers.  
3           The boundary realignment is not practical in this  
4           situation; the surrounding NPAs do not have an  
5           underutilization of NXX codes.     Additionally, if a  
6           boundary realignment were implemented, many customers  
7           would require complete ten-digit number changes because  
8           of NXX code conflicts that exist.

9

10        Q.     What was the recommendation of the group of  
11           telecommunications providers that met in Tampa in June  
12           1998?

13

14        A.     At that meeting, the Industry narrowed the acceptable  
15           methods of relief to two, a split plan and an overlay  
16           plan.     Further, the Industry reached consensus on the  
17           split method over the overlay method with the proposed  
18           split boundary being coincident with the line separating  
19           the Fort Myers LATA and the Tampa LATA.

20

21           This industry consensus was subsequently affirmed in an  
22           industry conference call, noticed and hosted by the  
23           NANPA, held August 10, 1998.     The final recommendation  
24           was forwarded to the Florida Public Service Commission on  
25           August 14, 1998.

1 Q. What factors were used in selecting the split plan over  
2 the overlay plan?

3

4 A. Changes in numbering and Area Codes are intended to have  
5 the least effect on customers.

6

7 In the case of the split plan for the relief of the 941  
8 NPA, the life of the relief was estimated to be 5.2 years  
9 for the area in the Tampa LATA and 5.9 years for the area  
10 in the Fort Myers LATA. With the overlay plan, the  
11 relief period was estimated to be 5.5 years.

12

13 The boundary for the proposed NPA split provides a nearly  
14 uniform division between areas. There were, as indicated  
15 in NANPA's communication to the Florida Public Service  
16 Commission, 298 NXXs in the Tampa LATA and 273 NXXs in  
17 the Fort Myers LATA.

18

19 Q. What, if any, were the discussions at the July 8, 1998  
20 meeting on which area would retain the existing 941 NPA  
21 code and which area would receive the new code?

22

23 A. Since the growth was forecasted to be greater in the  
24 Tampa LATA portion of this area and they have the greater  
25 number of NXX codes, NANPA guidelines indicate that the

1 Tampa LATA should retain the existing 941 code and the  
2 Fort Myers LATA be assigned the new code.

3

4 Q. Why is that so?

5

6 A. Using that guideline will help reduce the number of NPA  
7 changes that any particular area will undergo. The  
8 faster growing, larger area would need relief again  
9 sooner than the other area. If the new code were  
10 assigned to this faster growing area, some customers will  
11 undergo multiple NPA changes while the others would under  
12 go none during the same time period.

13

14 Q. What is the new code to be assigned to the Fort Myers  
15 LATA area?

16

17 A. The NANPA has not notified Sprint of the code assignment.  
18 I understand that the FPSC has requested the 241 NPA  
19 code. The 241 code has been communicated as the new code  
20 to the consumers by the media.

21

22 Q. What are the ramifications to the selection of the 241  
23 NPA relief code?

24

25 A. Since the code 241 is similar, the last two digits being

1 the same as the existing code, there is a strong  
2 likelihood for customer confusion. This confusion would  
3 lead to misdialed calls, increased traffic to operator  
4 and customer service centers, and customer  
5 dissatisfaction.

6

7 Q. Do you recommend any specific code?

8

9 A. No. The criteria for selecting a new code should include:  
10 nonduplication with existing or reserved NXX codes in the  
11 area; distinctively different from surrounding NPA codes;  
12 and not an "easily recognizable" code such as 500 or 333.  
13 The selection of the specific code should be left up to  
14 NANPA with a review by the industry code holders for  
15 acceptance prior to publication to the public, as in the  
16 past.

17

18 Q. What would the customers have to dial to complete calls  
19 with this proposed NPA relief plan?

20

21 A. Please refer to Exhibit 2 of my testimony.

22

23 Q. You also referred to the costs to a customer with a  
24 number change, can you be more specific?

25

1       A.    Yes.   Some of the costs are economic, others are not.  
2            The customers who undergo a NPA change, even though  
3            telecommunications companies attempt to mitigate the  
4            impact, are required to reprint advertising media,  
5            stationery, etc.   Businesses with PABXs and similar  
6            devices will need to reprogram the units.  They may also  
7            want inform all their existing customers, business  
8            relationships, and acquaintances of the change.

9  
10           With either of the alternatives, there are costs to  
11           telecommunications providers for the implementation.

12

13       Q.    How many customers will this proposed NPA relief affect?

14

15       A.    At the end of January, 1999, Sprint had 208,326 business  
16            and 582,133 residence access lines in the Fort Myers  
17            LATA.  Sprint has no local telephone customers in the  
18            Tampa LATA at this time.

19

20       Q.    Would any customers be required to change the seven-digit  
21            portion of the telephone number as a result of the  
22            proposed NPA split plan?

23

24       A.    Unless the costly step of rearranging the boundaries of  
25            specific exchanges or wire-centers is undertaken, no

1 Sprint customer would need to change their entire ten-  
2 digit telephone number. In the split plan, only the NPA  
3 code would change. For the overlay plan, even the NPA  
4 code would not change for existing customers.

5

6 Q. What happens at the exhaust dates for each of the plans?

7

8 A. With the proposed NPA split plan the process will be  
9 similar to what we are experiencing now. Each area will  
10 be considered for relief at the appropriate time prior to  
11 exhaust; in about four years. Additional relief plans  
12 will have to be examined, decided upon, and implemented.

13

14 For an overlay plan, at the exhaust point, a new NPA code  
15 will be activated for the area. There will not need to  
16 be a transitory period for implementation and customers  
17 would not undergo telephone number changes.

18

19 Q. Should an NPA Split be ordered by the Florida Public  
20 Service Commission, what would Sprint do to assist  
21 customers with the transition?

22

23 A. As in the past, Sprint will under take a campaign to  
24 notify our customers. Individual consumers will be  
25 notified with media releases, targeted advertising, bill

1 inserts, and other forms of communication.

2

3 Larger customers will be notified directly, by mail or in  
4 person, of any changes that affect them. They will be  
5 advised of what appropriate actions to take such as  
6 reprinting of stationery, notification of suppliers and  
7 customers, and reprogramming of PABXS.

8

9 While CLECS, Wireless Carriers, and Interexchange  
10 Carriers receive their notifications through the Local  
11 Exchange Routing Guide (LERG), the industry's vehicle for  
12 such notifications, Sprint will also notify, and work  
13 with, those with whom we interconnect to facilitate a  
14 smooth transition.

15

16 No matter which NPA relief alternative is ultimately  
17 ordered, Sprint will do all that is reasonably possible  
18 to assist customers, as we have in the past, with any  
19 transition issue.

20

21 Q. You noted that in with the overlay plan, 10-digit dialing  
22 would be required on local calls. What ten-digit dialing  
23 would be required for the proposed NPA split plan?

24

25 A. This is true, ten-digit dialing would be required for all



1           intra-NPA local calls with the overlay plan. In fact,  
2           even with the NPA split plan, 10-digit dialing would be  
3           required for all local cross NPA boundary dialing. I  
4           would like to point out that the implementation of 10-  
5           digit dialing will have no effect on the rates that  
6           customers now enjoy. As I indicated earlier in my  
7           testimony, eventually, all local calls will require ten-  
8           digit dialing.

9  
10           The need to expand to 10-digit dialing was identified  
11           several years ago. In 1993, Bellcore, the NANP  
12           Administrator at the time, recommended that all local  
13           dialing, including that associated with overlay NPAs, be  
14           10-digit. Reference: Section 7.7 page 36, *Bellcore IL-*  
15           *93/01-0008, North American Numbering Plan Administrator's*  
16           *Proposal on the Future of Numbering in WZ1 - Second*  
17           *Edition.*

18  
19           Q. Throughout your testimony, you have addressed several  
20           implementation issues. Are there any additional issues  
21           to address?

22  
23           A. Yes, there are, several.

24  
25           Q. Can you enumerate please?

1       A.    First there is the timing of the implementation of the  
2            relief plan.  To provide for the required notifications  
3            to the Industry, worldwide, the notification of the NPA  
4            relief activity needs to be published in the LERG twice.  
5            Allowing for publication closing dates, a period of  
6            ninety days from the date that the relief NPA code is  
7            identified and all issues surrounding the location and  
8            application of the new relief code are settled.  At the  
9            same time, Sprint will be updating its network to  
10           accommodate the change and preliminary public  
11           notification plans can be formulated.  After this ninety-  
12           day period, customers need at least an additional ninety  
13           and more likely 180 days to prepare for the change.  This  
14           second time period, the permissive dialing period, cannot  
15           begin until the network is ready to accept the new code.

16

17       Q.    Why not save some time and overlap the permissive dialing  
18            period and that first ninety day period?

19

20       A.    If Sprint were to notify its customers ahead of the date  
21            when the network, nationally, is ready, customer  
22            confusion and misdialed calls will result.  Some  
23            customers may not realize a separate, future start date  
24            and begin their work prematurely.  In the case of alarm  
25            dialers, early conversion may mean calls to central

1           bureaus not being completed.

2

3       Q.    Are there concerns about the timing of this relief  
4           activity for the 941 NPA?

5

6       A.    Yes.  Currently the 941 NPA is forecasted to exhaust in  
7           the fourth quarter, 1999.  With the Order in this  
8           proceeding expected in June 1999.  Relief will not be  
9           available until the late in the first quarter, 2000.  
10          Sprint received notification from the NANPA on March 17,  
11          1999 that they have placed the 941 NPA in extraordinary  
12          jeopardy.  The discrepancy in the dates contributed to  
13          the NANPA placing the 941 NPA in jeopardy and  
14          necessitating a conservation or restriction on the  
15          availability of numbering resources to the current code  
16          holders of, and new entrants to, the 941 NPA.

17

18       Q.    What does this extraordinary jeopardy situation mean?

19

20       A.    Basically, NANPA has determined that there are  
21           insufficient numbering resources in the 941 NPA to last  
22           until relief occurs.  The industry will now be called  
23           together to decide on measures that will put in place to  
24           allow the numbering resources to last until the relief is  
25           attained.  The extraordinary jeopardy guidelines allow

1 for measures including the "return" of previously  
2 assigned but unused NXX codes. Also, limitations on the  
3 number of codes to be assigned will be levied, with a  
4 possible lottery to determine recipients of NXX codes.  
5 There is an industry conference call established in early  
6 April 1999 to address the issues and attain consensus on  
7 the methods to be used.

8

9 Q. What other issues do you see as needing resolution?

10

11 A. Before implementation can proceed, all NXX codes affected  
12 must be identified and included in the LERG notification.  
13 This means that all NPA boundary issues and exchange  
14 realignments, if any, need to be complete prior to the  
15 start of the first ninety-day period. Without this being  
16 done, the information customers receive will be subject  
17 to revision, confusing, and impossible to control. The  
18 customers cannot be subjected to multiple confusing  
19 messages at the last minute, let alone subjected to  
20 additional changes as situations unfold. There are two  
21 such issues affecting this relief activity. There is the  
22 request by Ft. Meade area residents to be included with  
23 Polk County (the 941 NPA) and the request by some  
24 residents of the Englewood area to remain in the 941 NPA.  
25 These two items are currently covered in separate dockets

1 from this proceeding.

2

3 Q. What are the resolutions to the above two issues?

4

5 A. In the Ft. Meade situation, Sprint has agreed, when the  
6 NPA relief activity occurs, to assign the Ft. Meade  
7 Exchange (2,681 residence access lines and 636 business  
8 access lines) to the NPA that serves Polk County. This  
9 would preclude Ft. Meade subscribers from dialing across  
10 an NPA boundary to reach their county seat.

11

12 In the case of the Englewood request, there hasn't been  
13 a satisfactory resolution identified.

14

15 One possible remedy has been suggested that would move  
16 the Cape Haze Exchange to the area that retains the 941  
17 NPA. Doing this, however, will cause the Cape Haze  
18 Exchange subscribers to dial the ten-digits across an NPA  
19 boundary to their county seat.

20

21 Another idea brought forth would be to move all Charlotte  
22 County to the area proposed to remain the 941 NPA. This  
23 move would cause as many or more boundary problems than  
24 currently exist. The exchanges of Boca Grande, North  
25 Fort Myers, Punta Gorda, and Port Charlotte all extend

1 from Charlotte County into other counties. In addition,  
2 the NXX codes in Charlotte County, if moved to the  
3 proposed 941 NPA, would produce a significant imbalance  
4 in the number of NXX codes between the two areas, causing  
5 the relief period for the proposed 941 NPA to be  
6 shortened from its 5.2 years (projected).

7

8 This lack of resolution for the Englewood issue is the  
9 problem. Until the NPA boundaries, etc. are set,  
10 progress on the implementation of the relief plan for the  
11 941 NPA cannot effectively continue.

12

13 Q. It seems a lot of people wish to remain identified with  
14 the 941 NPA.

15

16 A. People are somewhat adverse to change. Numbering  
17 resource planners see it all the time: "change any number  
18 but mine". Also, people somehow get the impression that  
19 a number change means an increase in rates or that all  
20 EAS, ECS, etc. will disappear if they have to call into  
21 another NPA and all such calls now become toll calls.  
22 This is not true, of course.

23

24 As has been seen in recent NPA relief activities,  
25 consumers adapt rapidly and efficiently. The 904/850 NPA

1 relief activity of a few years ago is a very good  
2 example. It was thought that people could not adapt and  
3 they would no longer be able to communicate with  
4 officials of their State Government. As the State  
5 employees here can probably attest, this did not happen.  
6 The population adapted.

7

8 In fact, if the current residents of this area wish to  
9 keep the 941 NPA, there still is the overlay plan to  
10 consider.

11

12 Q. During your testimony, you have referred to the consensus  
13 reached by the industry in selecting the NPA split method  
14 over the other relief arrangements. Do you have,  
15 professionally, a recommendation to provide relief to the  
16 941 NPA?

17

18 A. In my professional opinion, the overlay as proposed at  
19 the industry meeting in July 1998 is preferable and would  
20 be the best short and long term method of providing  
21 relief to this area. The overlay method would:

22 - Address the concerns of residents of the affected  
23 area having to change the NPA portion of the  
24 telephone numbers and the perception of  
25 subsequently losing identity with one's community,

- 1           -     Provide the longest relief interval available with  
2                     a single new NPA,  
3           -     Would be the least disruptive to consumers for  
4                     future relief activities, and  
5           -     Preclude an NXX and NPA exhaust imbalance from  
6                     forcing multiple NPA relief activities unfairly on  
7                     one geographic area.

8

9     Q.     This is not the method upon which the Industry reached  
10            consensus. Please explain.

11

12     A.     The split plan is workable as proposed by the industry.  
13            It will meet all the criteria identified in the NANPA's  
14            relief guidelines. Sometimes, in the consensus process  
15            it is necessary to not insist on one's first choice as  
16            the only way, but to decide on a method that will be  
17            acceptable to the parties. Sprint could support either  
18            of the two plans proposed in the Industry meeting.

19

20     Q.     Does this conclude your testimony?

21

22     A.     Yes it does. Thank you.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

THOMAS C. FOLEY

Exhibit 1

Page 1 of 5

Letter and

Attendance List for the

July 8, 1998

Industry Meeting

Held in Tampa, Florida

AUG. 17. 1998 7:44PM

NA

Lockheed Martin IMS  
Communications Industry Services  
1133 15th Street, N.W. Washington, D.C. 20005  
Telephone 202-756-5600 Facsimile 202-887-0331

NO. 237U P. 3/19

Exhibit 1 - Page 2 of 5  
Sprint-FL, Inc. - TCF

**LOCKHEED MARTIN**



August 14, 1998

Walter D'Haeseleer, Director  
Division of Communications  
State of Florida  
Public Service Commission  
Tallahassee, Florida

Dear Mr. D'Haeseleer:

On behalf of the telecommunications industry in Southwest Florida, Lockheed Martin submits the following recommendation for relief of Florida's 941 area code. As the neutral, third party administrator, Lockheed Martin IMS has no independent view regarding the selected relief option.

Based on current demand projections for Central Office (CO) codes, it is estimated that without any means of relief, Southwest Florida will exhaust the supply of CO codes in the 941 area by approximately the fourth quarter of 1999. Pursuant to the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016), an industry meeting was held on July 8, 1998 to discuss various relief alternatives. The industry reached consensus to recommend Alternative Relief Plan #2, a geographic split, as the method of relief for the 941 area code.

The attached documents provide background information, a status of industry's efforts, industry meeting notes and a description of the geographic split relief alternative recommended by the industry. The attached minutes of the July 8, 1998, industry meeting, also include a description of all of the relief alternatives considered by the industry.

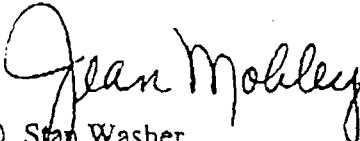
Furthermore, the industry reached consensus on the following implementation dates for the geographic split:

- Florida Public Service Commission approval announcement-11/1/98(±)/a.s.a.p.
- Permissive Dialing Begins - March 1999
- Permissive Dialing Ends/Mandatory Begins -September 1999
- Effective Date for New CO Code Assignments- October 1999

This schedule will ensure sufficient time for service providers to modify their networks and to educate all telecommunications customers who live in, work in, and call into the 941 area code prior to the introduction of the geographic split and the new area code.

We have been asked by the industry to submit the results of its efforts and to request approval of its recommendation no later than November 1, 1998, in order to effect a smooth transition and guarantee an uninterrupted supply of numbers.

Sincerely,

*for*   
Stan Washer  
Senior NPA Relief Planner - Central Region

Copy: 941 NPA Code Holders & Other Industry Members  
MaryRose Sirianni

Attachments

Exhibit 1 - Page 4 of 5  
Sprint-FL, Inc. - TCF

Init	Last Name	First Name	Company	Phone 1	Phone 2
	Hopson	Pat	360° Communications	773-399-2419	773-399-7201
	Rogers	Ken	360° Communications	773-399-5381	773-399-2536
	Go	Richard	360° Communications	773-399-2333	773-399-7201
	Reichenberger	Tom	Aerial Communications	813-243-3205	813-243-1908
X	Martin	Michael	Aerial Communications, Inc.	813-453-8840	813-243-1908
	Holt	Lew	Aerial Communications, Inc.	813-243-3224	813-243-1908
	McCartney	Joe	AGR/Pronet Paging Inc.	813-572-6646	813-573-7844
	Jordan	Paula	AirTouch Communications	510-279-6033	510-279-6621
	Bolich	Mark	AirTouch Paging	813-572-742	813-573-0329
	Logering	Dennis	American Paging	813-288-9497	813-289-3966
	Fredlund	Andy	Arch Communications	561-912-7410	561-912-7450
	Gadbois	Steve	Arch Communications	704-341-5131	704-544-0103
	Reinhart	Roger A.	AT & T Wireless Services	201-986-7306	201-291-8108
	McGee	Thomas	AT&T	770-785-5872	770-602-2455
	McGee	Debbie	AT&T Local	908-771-4237	908-771-8268
	Gianella	John	AT&T Wireless	561-775-4444	561-775-4253
	Meins	Charlene	AT&T Wireless	425-803-1232	425-828-8809
	Cahall	Richard	AT&T Wireless Services	561-432-6468	561-432-6555
	Sullivan	Joseph	AT&T Wireless Services	713-871-3812	713-871-3846
	Mangelo	Rich	ATT Local	908-771-2690	908-771-8268
	Haferl	Robert	Bell Atlantic Mobile	908-256-7165	908-256-7010
	Hoskins	Anne	Bell Atlantic Mobile	973-622-4444	973-624-7070
X	Merriman	Rebecca	BellSouth	813-417-1092	813-930-6319
	Burleson	Ron	BellSouth Cellular	404-249-0455	404-249-0453
	Jardon	Mario	BellSouth Mobility	581-995-3583	561-895-3567
	McCullough	Doug	BellSouth Telecommunications	205-977-5069	205-977-7877
	Merrill	J.B.	BTI	919-510-7270	919-510-7239
X	Welbaum	Deana	City of Lakeland	941-499-6803	941-499-8821
	Cummings	Harry	City of Lakeland	941-499-8760	941-499-8761
	Edwards	Donald	Comcast Cablevision	610-538-3003	610-538-3016
	Robertson	Marzie	Conxus	864-241-5453	864-241-5483
	Plott	David	CONXUS Network, Inc.	864-239-5311	864-241-8197
	Taylor	Greg	Digiph	770-446-5020	770-446-5035
	Jobe	Jack	Dynatel Paging	904-730-6000	904-730-2012
	Jordan	Barbara	Espire Communications	301-361-7823	301-361-7667
X	Sirianni	Maryrose	Florida PSC	850-413-6564	850-413-6565
	Wickham	Jennifer	Gostek Communications, Inc.	201-930-5187	201-930-0287
X	Gancarz	Skip	GTE	813-483-2033	813-228-8733
X	Harshbarger	A. L.	GTE	813-483-2541	813-204-8862
X	Adair	Grady	GTE - Florida	813-483-2529	813-223-4888
X	Tapia	Larry	GTE Florida	813-483-2188	813-221-8103
X	Sadler	Harry	GTE Florida	813-483-2005	813-228-8733
X	Hancock	Hershel	GTE Moblnet of Tampa, Inc.	813-282-8417	813-620-4124
X	Watkins	Daryl	GTE Wireless	813-282-6431	813-620-4124
	Vandyke	Robert	Intermedia Communications of Florid	813-829-2498	813-829-2281
	Roberts	Sherita	LDDS WorldCom	918-590-8529	918-590-5598
	Faul	Kelly	MCI	703-918-0457	703-918-6814
	Williams	Frederick	MCI Long Distance	972-918-1816	972-918-1821
	Harvey	Karen	MCI Metro	703-918-6848	703-918-6652
	Reaves	Terri	MCI Metro Access Services.	703-918-6152	703-918-6617
	Gonzalez	Izzy	MediaOne	904-619-3323	904-619-3355
	Day	Steven	Metrocall	703-660-8677	703-765-4385
	Wooten	Kristy	Mobil Comm	601-977-1575	601-977-1748
	Mansour	Mark A.	National Telecommunications	954-491-9300	954-491-1832
	Williams	Terry	Nextel	407-948-2145	407-667-1240
	Salpietra	Carl	Nextel	407-948-2142	407-667-1240

Exhibit 1 - Page 5 of 5  
Sprint-FL, Inc. - TCF

First Name	Last Name	Company	Home	Work
Tirador	Judy	Omnipoint Communications	973-290-2411	973-290-2445
Charity	Arlene	PageMart	214-706-8209	214-750-9201
Wiginton	Bill	Pagenet	972-985-5162	972-985-4081
Stedie	Mazen	Pager One of Florida, Inc.	561-687-8400	561-687-1235
Rosario	Reggie	Paging Network of Tampa	813-873-8400	813-876-3710
Van Allen	Eric	Palmer Cellular		912-650-7321
Sanders	John F.	Preferred Networks	770-416-5931	770-734-0936
Pierre	Janet	Primeco PC	407-786-2017	407-916-0084
Azif	Jeremy	PrimeCo Personal Communications	817-258-1241	817-258-1202
Webster	Angela	Sprint	913-624-6016	913-624-5504
X Craven	Brian	Sprint	407-889-8807	407-884-0206
X Taulbee	Kathy	Sprint		407-884-1919
X Foley	Tom	Sprint	407-889-6168	407-884-1819
X Green	Barbara	Sprint	407-830-3245	407-332-9365
Kimmell	Beth	Sprint	816-559-5023	816-559-5093
Key	Tony	Sprint Communications	404-649-5144	404-649-5174
Figlioli	Vito	Sprint PCS	813-639-2023	813-639-2050
Krug	John F.	Teleport Comm.	718-355-2762	718-355-4804
Rutledge	Tene	Teligent Inc.	703-762-5532	703-288-5643
Newkirk	Teresa	Time Warner Telecom	303-705-4663	303-705-1874
Hunter	Dena	Time Warner Telecom	303-705-1818	303-705-1874
Twombly	Dana	Utilities, Inc.	207-642-7208	207-642-3095
Lukowski	Ray	Winstar Telecommunications, Inc.	703-645-5466	703-645-5395

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

THOMAS C. FOLEY

Exhibit 2

Page 1 of 2

Recommended Dialing Plan

For the Proposed

Southwest Florida

NPA Split

Call Type	Home NPA	Foreign NPA
Local Call (incl. EAS)	7 or 10-Digits	10-Digits
Toll Call (incl. competitive ECS)	1+10-Digits	1+10-Digits

Note: Existing cross NPA boundary 7-digit dialing should be converted to 10-digit dialing

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

THOMAS C. FOLEY

Exhibit 2

Page 2 of 2

**Recommended Dialing Plan**

**For Southwest Florida**

**NPA Overlay Proposal**

<b>Call Type</b>	<b>Home NPA</b>	<b>Foreign NPA</b>
Local Call (incl. EAS)	10-Digits	10-Digits
Toll Call (incl. competitive ECS)	1+10-Digits	1+10-Digits

Note: Existing cross NPA boundary 7-digit dialing should be converted to 10-digit dialing

CERTIFICATE OF SERVICE  
DOCKET NO. 990223-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 18th day of March, 1999 to the following:

GTE Florida Incorporated  
Ms. Beverly Y. Menard  
% Ms. Margo B. Hammar  
106 East College Avenue  
Suite 810  
Tallahassee, Florida 32301-7704

Oakview Lake Homeowners  
Association  
300 S. Washington Ave.  
Fort Meade, Florida 33841

Polk County Board of Commissioners  
Comm. Bruce Parker  
330 W. Church Street  
Drawer BC01  
Post Office Box 9005  
Bartow, Florida 33831-9005

Mike Stedem  
3200 Hwy 17 N.  
Post Office Box 976  
Fort Meade, Florida 33841

City of Ft. Meade  
Fritz Behring  
8 West Broadway  
Post Office Box 856  
Ft. Meade, Florida 33841-0856

Dr. Willard Coy,  
Vice-Chair, Area Planning Board  
244 Mark Twain Lane  
Rotonda West, Florida 33947

Englewood Water District  
Post Office Box 1399  
Englewood, Florida 34295-1399

Olde Englewood Village Assn.  
Pam Domres, President  
285 Dearborn Street  
Englewood, Florida 34223

Shark Tees and Screenprinting  
Stephanie Mead  
425 W. Dearborn Street  
Englewood, Florida 34223

Cellular One  
Frank Heaton  
2100 Electronics Lane  
Fort Myers, Florida 33912

CHEETAH Technologies  
Gordon GreenField  
2501 63<sup>rd</sup> Avenue East  
Bradenton, Florida 34203

Florida Public  
Telecommunications Association  
Angela Green, General Counsel  
125 S. Gadsden Street, #200  
Tallahassee, Florida 32301-1525

Polk County Board of Commissioners  
Comm. Neil Combee  
330 W. Church Street  
Drawer BC0  
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