

SCANNED ORIGINAL



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Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

March 18, 1999

Re: Docket No. 990223-TL
Request for Review of Proposed Numbering Plan Relief for the 941 Area Code

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of the Direct Testimony of Charles M. Scobie on behalf of GTE Florida Incorporated for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

ACK _____ Sincerely,

AFA _____

APP _____ *[Handwritten signature]*

CAF _____ Kimberly Caswell

CMU lleri

CTR _____ KC:tas

EAG _____ Enclosures

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WAS _____

OTH _____ A part of GTE Corporation

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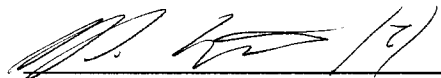
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Direct Testimony of Charles M. Scobie on behalf of GTE Florida Incorporated in Docket No. 990223-TL were sent via overnight delivery(*) on March 17, 1999 or U.S. mail(**) on March 18, 1999 to the parties on the attached list.



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GTE FLORIDA INCORPORATED
DIRECT TESTIMONY OF CHARLES M. SCOBIE
DOCKET NO. 990223-TL

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Charles Michael Scobie. My business address is One Tampa City Center, Tampa, Florida.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by GTE Service Corporation (GTE) as Manager-Regulatory Affairs.

Q. WILL YOU BRIEFLY STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE?

A. I have been employed by GTE for over twenty eight years. For the past nine and one half years I have been employed in the regulatory and governmental affairs area of GTE Florida and GTE Service Corporation. Prior to my present assignment, I held the positions of South Area Regulatory Affairs Manager, Tariff Administrator and Service Cost Coordinator in the same department. During my career I have also held positions in Sales, Market Planning, and Forecasting with GTE Florida and positions in Market Planning with GTE Service Corporation.

1 **Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC**
2 **SERVICE COMMISSION?**

3 A. Yes. I have testified before this Commission on numerous occasions.

4

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
6 **DOCKET?**

7 A. The purpose of my testimony is to present GTE's position on the
8 appropriate relief for the 941 area code. In addition, I will address the
9 dialing patterns that should be utilized in the 941 area code.

10

11 **Q. SHOULD THE COMMISSION APPROVE A GEOGRAPHIC SPLIT**
12 **FOR THE 941 AREA CODE RELIEF?**

13 A. Yes, as this was the relief that was unanimously approved by the
14 current code holders in the 941 area code.

15

16 **Q. WHY DOES GTE SUPPORT A GEOGRAPHIC SPLIT?**

17 A. Unlike the 813 area code for which an overlay was initially
18 recommended, the 941 area code covers a large geographic area.
19 The LATA boundary between GTE and Sprint was a reasonable basis
20 for the split and met the criteria for an area code split. In addition,
21 there are a limited number of routes between GTE and Sprint in the
22 941 area code which are dialed on a seven digit basis.

23

24 **Q. DOES THE LATA BOUNDARY HAVE TO BE THE BASIS FOR THE**
25 **GEOGRAPHIC SPLIT?**

1 A. No. There are currently two additional dockets which are looking at
2 the possible boundaries for the 941 area code split - Docket No.
3 981941-TL dealing with Ft. Meade and Docket No. 990184-TL
4 dealing with the Englewood area.

5

6 **Q. SHOULD THESE DOCKETS BE CONSOLIDATED?**

7 A. Yes. GTE and Sprint have filed a Joint Motion for consolidation of
8 these inextricably related dockets. However, if the dockets are not
9 consolidated, they should all be decided at the same time.

10

11 **Q. WHY DOES GTE SUPPORT CONSOLIDATION OF THESE**
12 **DOCKETS?**

13 A. The main reason is the need for a final, uniform decision before all
14 codes are used in the 941 area code. The recommendation for the
15 area code split was forwarded to the Florida Public Service
16 Commission on August 14, 1998. At that time, it was hoped a final
17 decision on the area code could be reached by November 1, 1998.
18 With a decision made in November, the plans were to implement
19 permissive dialing in March 1999 and mandatory dialing in September
20 1999.

21

22 **Q. DOES GTE HAVE A RECOMMENDATION ON THE BOUNDARY TO**
23 **BE USED FOR FT. MEADE AND ENGLEWOOD?**

24 A. No. Since there is no dividing line that won't require some ten digit
25 dialing, the Commission will need to determine the split that best

1 meets the needs of the majority of the customers.

2

3 **Q. WITH A GEOGRAPHIC SPLIT, WHICH AREA WILL RETAIN THE**
4 **941 AREA CODE?**

5 A. Since the growth was forecasted to be greater in the GTE area and
6 GTE has the greater number of NXX codes, NANPA guidelines
7 indicate that the Tampa LATA should retain the existing 941 area
8 code and the Ft. Myers LATA would be assigned a new area code.

9

10 **Q. DOES GTE HAVE A RECOMMENDATION ON THE NEW AREA**
11 **CODE WHICH SHOULD BE USED FOR THE FT. MYERS LATA?**

12 A. No. However, GTE is concerned about the press reports which have
13 suggested that area code 241 will be assigned to this area. Since
14 that number would have two digits which are the same as the current
15 area code, GTE is concerned that this would lead to customer
16 confusion and an unusually high volume of misdialed calls. The
17 current guidelines should be utilized with NANPA recommending a
18 code and the industry reviewing the code prior to publication to insure
19 there are no conflicts with the new code selected.

20

21 **Q. SINCE THE AREA CODE SPLIT HAS BEEN DELAYED, WHEN CAN**
22 **PERMISSIVE DIALING BE IMPLEMENTED?**

23 A. The industry normally prefers to have six months from the date of the
24 decision on an area code split until the beginning of permissive
25 dialing. Due to the requirements for LERG notification, a minimum of

1 90 days is required. In addition, GTE recommends that the
2 permissive dialing period begin on a Monday so that the required
3 billing system modifications can be completed over the weekend prior
4 to permissive dialing.

5

6 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR LOCAL CALLS?**

7 A. If a geographic split is implemented, some local calls should be dialed
8 on a ten-digit basis. If an overlay is implemented, all local calls
9 would be dialed on a ten-digit basis.

10

11 **Q. WHY SHOULD ANY LOCAL CALLS BE DIALED ON A TEN DIGIT**
12 **BASIS WHEN YOU IMPLEMENT A GEOGRAPHIC SPLIT?**

13 A. Due to the local/EAS/ECS calling areas, there is no dividing line
14 which will not split some local calling area. Exhibit No. CMS-1 shows
15 the proposed dialing patterns for three geographic split options and
16 two overlay options proposed by FPSC staff for GTE exchanges.

17

18 **Q. WHAT ARE THE INDUSTRY GUIDELINES ON LOCAL CALLING**
19 **BETWEEN DIFFERENT AREA CODES?**

20 A. The industry guidelines state that inter-NPA calls should be done on
21 a ten-digit basis to insure against code conflicts and inefficient usage
22 of NXXs.

23

24 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR TOLL CALLS?**

25 A. GTE completed the conversion for intraLATA equal access in

1 February 1997. The dialing pattern for all toll routes will continue to
2 be 1+10 digits regardless of the relief plan which is implemented.
3 Customers are also able to dial calls on all routes on a 1010XXX
4 basis.

5

6 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR EAS CALLS?**

7 A. If a geographic split is implemented, some EAS calls should be dialed
8 on a ten-digit basis as shown in Exhibit No. CMS-1. If an overlay is
9 implemented, all EAS calls would be dialed on a ten-digit basis.

10

11 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR ECS CALLS?**

12 A. If a geographic split is implemented, some ECS calls should be dialed
13 on a ten-digit basis and some could remain on a seven-digit basis as
14 shown in Exhibit No. CMS-1. If an overlay is implemented, all ECS
15 calls would be dialed on a ten-digit basis.

16

17 **Q. HAS THE COMMISSION MADE A GENERIC DECISION ON**
18 **DIALING PATTERNS FOR ECS CALLS?**

19 A. No. The Commission did initiate an investigation on dialing patterns
20 in Docket No. 960090-TP. It issued an Order on April 25, 1996 which
21 affected a number of BellSouth routes.

22

23 **Q. WHAT WAS THE COMMISSION'S RECOMMENDATION FOR THE**
24 **DIALING PATTERN FOR ECS CALLS IN THE LONG TERM?**

25 A. The recommendation was to dial all ECS calls on a 1+10 digit basis.

1 **Q. DID THE COMMISSION ADOPT THIS RECOMMENDATION IN THE**
2 **813 AREA CODE SPLIT WHICH WAS RECENTLY IMPLEMENTED?**

3 A. No. The decision in the 813 area code correctly recognized that
4 inter-NPA ECS calls cannot be dialed on a 1+10 digit basis if the LEC
5 handles the traffic. In addition, GTE's billing system can only handle
6 the billing of ECS calls dialed on a seven digit or ten digit basis.

7

8 **Q. WHAT IS GTE'S POSITION ON ALTERNATIVE 4 AS PROPOSED**
9 **BY FPSC STAFF?**

10 A. GTE does not believe that it is warranted to request two additional
11 area codes at this time. In addition, since all GTE customers would
12 be required to go to ten digit dialing, it would seem like Alternative 5
13 would be the better approach so all customers in the existing 941
14 area code would be able to maintain their current telephone number
15 including the area code.

16

17 **Q. WHAT IS GTE'S POSITION ON ALTERNATIVE 5 AS PROPOSED**
18 **BY FPSC STAFF?**

19 A. In this testimony, GTE has supported a geographic split as this was
20 the relief supported by all code holders. However, GTE believes that
21 an overlay NPA is a better option than a geographic split. An overlay
22 has the benefit of insuring that no existing customer has to change
23 the area code portion of their telephone number, wireless customers
24 in the new proposed NPA do not have to reprogram their phones, and
25 businesses do not have to reprint stationery, etc. In addition, it

1 avoids the problem of having to deal with the issue of trying to find a
2 boundary for a geographic split that best meets the desires of the
3 majority of the customers as there is probably no boundary which will
4 please all customers.

5

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 **A. Yes, it does.**

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Alternative 1 Split
GTE LATA (941), FT. MYERS LATA (New NPA)

7-digit Local Calls

Bartow	Mulberry
Bradenton	Myakka
Englewood	North Port
Frostproof	Palmetto
Haines City	Polk City
Indian Lake	Sarasota
Lakeland	Venice
Lake Wales	Winter Haven

7-digit EAS Calls

Bartow - Lakeland, Lake Wales, Mulberry, Winter Haven
Bradenton - Myakka, Palmetto, Sarasota
Englewood - North Port, Venice
Frostproof - Lake Wales
Haines City - Lake Wales, Winter Haven
Indian Lake - Lake Wales
Lakeland - Mulberry, Polk City, Winter Haven
Lake Wales - Winter Haven
Myakka - Palmetto, Sarasota
North Port - Venice
Polk City - Winter Haven
Sarasota - Venice

10-digit EAS Calls

Bartow - Ft. Meade
Englewood - Cape Haze
Lakeland - Ft. Meade
North Port - Port Charlotte

7-digit ECS Calls

Bartow - Haines City
Englewood - Sarasota
Haines City - Bartow, Lakeland, Polk City
North Port - Sarasota
Palmetto - Sarasota

10-digit ECS Calls

Englewood - Boca Grande

7-digit LCP Calls

Englewood - North Port, Venice, Myakka, Bradenton

Frostproof - Indian Lake, Lake Wales, Bartow, Haines City, Mulberry,
Poinciana, Winter Haven, Lakeland, Polk City

Indian Lake - Frostproof, Lake Wales, Haines City, Poinciana,
Winter Haven, Bartow, Lakeland, Mulberry, Polk City

Lake Wales - Bartow, Frostproof, Haines City, Poinciana, Winter Haven,
Indian Lake, Lakeland, Mulberry, Polk City

North Port - Englewood, Venice, Myakka, Bradenton, Palmetto

Polk City - Haines City, Lakeland, Poinciana, Winter Haven, Bartow,
Mulberry, Lake Wales, Frostproof, Indian Lake

10 - digit LCP Calls

Englewood - Cape Haze, Port Charlotte, Punta Gorda

Frostproof - Avon Park, Ft. Meade, Sebring

Indian Lake - Avon Park, Ft. Meade, Sebring

Lake Wales - Avon Park, Ft. Meade, Sebring

North Port - Port Charlotte, Cape Haze, Punta Gorda

Polk City - Ft. Meade

Note: All EAS and ECS routes shown are two-way routes.

Alternative 2 Split
GTE LATA (941), FT. MYERS LATA (New NPA)

7-digit Local Calls

Bartow	Mulberry
Bradenton	Myakka
Englewood	North Port
Frostproof	Palmetto
Haines City	Polk City
Indian Lake	Sarasota
Lakeland	Venice
Lake Wales	Winter Haven

7-digit EAS Calls

Bartow - Lakeland, Lake Wales, Mulberry, Winter Haven, Ft. Meade
Bradenton - Myakka, Palmetto, Sarasota
Englewood - North Port, Venice, Cape Haze
Frostproof - Lake Wales
Haines City - Lake Wales, Winter Haven
Indian Lake - Lake Wales
Lakeland - Mulberry, Polk City, Winter Haven, Ft. Meade
Lake Wales - Winter Haven
Myakka - Palmetto, Sarasota
North Port - Venice, Port Charlotte
Polk City - Winter Haven
Sarasota - Venice

7-digit ECS Calls

Bartow - Haines City
Englewood - Sarasota
Haines City - Bartow, Lakeland, Polk City
North Port - Sarasota
Palmetto - Sarasota

10-digit ECS Calls

Englewood - Boca Grande

7-digit LCP Calls

Englewood - North Port, Venice, Myakka, Bradenton, Cape Haze,
Port Charlotte

Frostproof - Indian Lake, Lake Wales, Bartow, Haines City, Mulberry,
Poinciana, Winter Haven, Lakeland, Polk City, Ft. Meade

Indian Lake - Frostproof, Lake Wales, Haines City, Poinciana,
Winter Haven, Bartow, Lakeland, Mulberry, Polk City, Ft. Meade

Lake Wales - Bartow, Frostproof, Haines City, Poinciana, Winter Haven,
Indian Lake, Lakeland, Mulberry, Polk City, Ft. Meade

North Port - Englewood, Venice, Myakka, Bradenton, Palmetto, Port
Charlotte, Cape Haze

Polk City - Haines City, Lakeland, Poinciana, Winter Haven, Bartow,
Mulberry, Lake Wales, Frostproof, Indian Lake, Ft. Meade

10 - digit LCP Calls

Englewood - Punta Gorda

Frostproof - Avon Park, Sebring

Indian Lake - Avon Park, Sebring

Lake Wales - Avon Park, Sebring

North Port - Punta Gorda

Note: All EAS and ECS routes shown are two-way routes.

Alternative 3 Split
GTE LATA (941), FT. MYERS LATA (New NPA)

7-digit Local Calls

Bartow	Mulberry
Bradenton	Myakka
Englewood	North Port
Frostproof	Palmetto
Haines City	Polk City
Indian Lake	Sarasota
Lakeland	Venice
Lake Wales	Winter Haven

7-digit EAS Calls

Bartow - Lakeland, Lake Wales, Mulberry, Winter Haven, Ft. Meade
Bradenton - Myakka, Palmetto, Sarasota
Englewood - North Port, Venice, Cape Haze
Frostproof - Lake Wales
Haines City - Lake Wales, Winter Haven
Indian Lake - Lake Wales
Lakeland - Mulberry, Polk City, Winter Haven, Ft. Meade
Lake Wales - Winter Haven
Myakka - Palmetto, Sarasota
North Port - Venice, Port Charlotte
Polk City - Winter Haven
Sarasota - Venice

7-digit ECS Calls

Bartow - Haines City
Englewood - Sarasota
Haines City - Bartow, Lakeland, Polk City
North Port - Sarasota
Palmetto - Sarasota

10-digit ECS Calls

Englewood - Boca Grande

7-digit LCP Calls

Englewood - North Port, Venice, Myakka, Bradenton, Cape Haze,
Port Charlotte, Punta Gorda

Frostproof - Indian Lake, Lake Wales, Bartow, Haines City, Mulberry,
Poinciana, Winter Haven, Lakeland, Polk City, Ft. Meade

Indian Lake - Frostproof, Lake Wales, Haines City, Poinciana,
Winter Haven, Bartow, Lakeland, Mulberry, Polk City, Ft. Meade

Lake Wales - Bartow, Frostproof, Haines City, Poinciana, Winter Haven,
Indian Lake, Lakeland, Mulberry, Polk City, Ft. Meade

North Port - Englewood, Venice, Myakka, Bradenton, Palmetto, Port
Charlotte, Cape Haze, Punta Gorda

Polk City - Haines City, Lakeland, Poinciana, Winter Haven, Bartow,
Mulberry, Lake Wales, Frostproof, Indian Lake, Ft. Meade

10 - digit LCP Calls

Frostproof - Avon Park, Sebring

Indian Lake - Avon Park, Sebring

Lake Wales - Avon Park, Sebring

Note: All EAS and ECS routes shown are two-way routes.

Alternative 4 Split and Overlay
GTE LATA (941 and New NPA), FT. MYERS LATA (New NPA)

Alternative 5 Overlay (New NPA)
GTE LATA (941), FT. MYERS LATA (941)

10-digit Local Calls

Bartow	Mulberry
Bradenton	Myakka
Englewood	North Port
Frostproof	Palmetto
Haines City	Polk City
Indian Lake	Sarasota
Lakeland	Venice
Lake Wales	Winter Haven

10-digit EAS Calls

Bartow - Lakeland, Lake Wales, Mulberry, Winter Haven, Ft. Meade
Bradenton - Myakka, Palmetto, Sarasota
Englewood - North Port, Venice, Cape Haze
Frostproof - Lake Wales
Haines City - Lake Wales, Winter Haven
Indian Lake - Lake Wales
Lakeland - Mulberry, Polk City, Winter Haven, Ft. Meade
Lake Wales - Winter Haven
Myakka - Palmetto, Sarasota
North Port - Venice, Port Charlotte
Polk City - Winter Haven
Sarasota - Venice

10-digit ECS Calls

Bartow - Haines City
Englewood - Sarasota, Boca Grande
Haines City - Bartow, Lakeland, Polk City
North Port - Sarasota
Palmetto - Sarasota

10-digit LCP Calls

Englewood - North Port, Venice, Myakka, Bradenton, Cape Haze,
Port Charlotte, Punta Gorda

Frostproof - Indian Lake, Lake Wales, Bartow, Haines City, Mulberry,
Poinciana, Winter Haven, Lakeland, Polk City, Ft. Meade, Avon Park,
Sebring

Indian Lake - Frostproof, Lake Wales, Haines City, Poinciana,
Winter Haven, Bartow, Lakeland, Mulberry, Polk City, Ft. Meade,
Avon Park, Sebring

Lake Wales - Bartow, Frostproof, Haines City, Poinciana, Winter Haven,
Indian Lake, Lakeland, Mulberry, Polk City, Ft. Meade, Avon Park,
Sebring

North Port - Englewood, Venice, Myakka, Bradenton, Palmetto, Port
Charlotte, Cape Haze, Punta Gorda

Polk City - Haines City, Lakeland, Poinciana, Winter Haven, Bartow,
Mulberry, Lake Wales, Frostproof, Indian Lake, Ft. Meade

Note: All EAS and ECS routes shown are two-way routes.