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PRE-FILED DIRECT TESTIMONY
OF
FRANCIS J. HEATON
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
ON BEHALF OF
WIRELESS ONE NETWORK LP d/b/a CELLULAR ONE
STATE OF FLORIDA
DOCKET NO. 990223-TL

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.**

2 A. MY NAME IS FRANK HEATON, BUSINESS ADDRESS 2100 ELECTRONICS LANE, FT. MYERS FL.

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

4 A. I AM THE DIRECTOR OF EXTERNAL AFFAIRS FOR WIRELESS ONE NETWORK L.P. (WIRELESS
5 ONE OR WON).

6 **Q. PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES.**

7 A AMONG OTHER DUTIES, I AM THE COMPANY REGULATORY REPRESENTATIVE, AND I
8 PROCURE ALL OUR TELECOMMUNICATIONS SERVICES FROM INTRALATA AND INTERLATA
9 VENDORS. MY RESPONSIBILITIES INCLUDE OBTAINING NEW NNX CODES AS NEEDED.

10 **Q. HOW LONG HAVE YOU BEEN IN YOUR CURRENT POSITION?**

11 A. I HAVE BEEN INVOLVED IN SIMILAR ACTIVITY FOR THE SAME MANAGEMENT SINCE 1987.
12 WE HAVE ONLY OPERATED IN THE FLORIDA MARKET SINCE 1990; ASCENDING FROM JUST
13 THE FL1 RSA AT THAT TIME TO SIX OPERATING FLORIDA MARKETS. THE PENSACOLA AND
14 FT. WALTON MARKETS IN THE PENSACOLA LATA WERE ONLY ACQUIRED IN 1998. IN 1997 WE
15 ACQUIRED THE FT. MYERS MARKET. WE HAVE BEEN OPERATING THE FL2 RSA SINCE 1995,
16 AND THE FL3 RSA SINCE 1991. DURING THE PERIOD 1987-1997 WE OPERATED UNDER
17 DIFFERENT BUSINESS NAMES IN MARKETS SERVING KENTUCKY, OHIO, PENNSYLVANIA,
18 WEST VIRGINIA AND BRIEFLY IOWA. I PERFORMED SIMILAR SERVICES FOR ALL THOSE
19 OPERATIONS.

20 **Q. WHAT WAS YOUR PRIOR REGULATORY EXPERIENCE IN TELECOMMUNICATIONS?**

21 A. FROM 1983 TO 1986 I WAS EMPLOYED BY THE SAME MANAGEMENT UNDER DIFFERENT
22 BUSINESS NAMES PRIMARILY IN THE CONTEXT OF LICENSE APPLICATIONS, AND
23 OCCASIONALLY CONSTRUCTING NEW CELLULAR MARKETS. THE PRECEDING THREE
24 YEARS I HAD SERVED AS DIRECTOR-REGULATORY AFFAIRS FOR A MANHATTAN BASED
25 NATIONAL PAGING CARRIER. THE PRECEDING SEVEN AND A HALF YEARS I HAD SPENT WITH
26 THE NEW YORK STATE PUBLIC SERVICE COMMISSION AS A COMMUNICATIONS RATE
27 ANALYST. PRIOR TO THAT IN REVERSE ORDER I HAD BEEN COMMERCIAL SUPERVISOR -

1 TARIFFS & RATES FOR A SEVEN STATE, TWO CANADIAN PROVIDENCE TELEPHONE HOLDING
2 COMPANY DIVISION FOR APPROXIMATELY THREE YEARS, AND A MANAGEMENT TRAINEE
3 FOR AN INDEPENDENT TELEPHONE COMPANY FOR APPROXIMATELY THREE YEARS.

4 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

5 A. I HAVE BS AND MBA DEGREES.

6 **Q. WHY IS WIRELESS ONE NETWORK INTERVENING IN THIS PROCEEDING?**

7 A. WIRELESS ONE NETWORK L.P. d/b/a CELLULAR ONE IS THE "A" SIDE CELLULAR CARRIER
8 IN CHARLOTTE, COLLIER, DESOTO, HARDEE, HENDRY, HIGHLANDS, GLADES AND LEE
9 COUNTIES WITHIN THE FT. MYERS LATA - IN WHICH THE ONLY INCUMBENT LOCAL
10 EXCHANGE COMPANY IS SPRINT. WIRELESS ONE BELIEVES IT IS THE SECOND LARGEST USER
11 OF ACTIVE TELEPHONE NUMBERS IN THE FORT MYERS LATA, AND AT WORST THE FIFTH
12 LARGEST USER OF ACTIVE TELEPHONE NUMBERS WITHIN THE 941 AREA CODE.
13 WE WERE SHOCKED THAT WE HAD NOT BEEN INFORMED OF THE EVOLUTION OF AN AREA
14 CODE SPLIT AFFECTING OUR SERVICE AREA AND CUSTOMERS PRIOR TO FEBRUARY 26,
15 1999, AND DUE TO THE ACCELERATED SCHEDULE IN THIS TESTIMONY WE HAD TO SEEK
16 PERMISSION TO LATE FILE THIS TESTIMONY.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

18 A. OUR JOINT PURPOSES IN THE CONTEXT OF THIS DOCKET 99-0223 -TL PROCEEDING ARE TO
19 1. PERSUADE THE FPSC AND AS NECESSARY THE NANPA THAT A NNX EXHAUST WITHIN THE
20 941 AREA IS NOT IMMINENT AND THAT AT LEAST A 12 MONTH PERMISSIVE DIALING
21 INTERVAL FOR THE GEOGRAPHIC AREA FORCED TO MAKE A NUMBER CHANGE IS IN THE
22 PUBLIC INTEREST, AND
23 2. TO ASK THAT THE DECISION OF WHICH OF THE TWO HERETOFORE CONTEMPLATED AREAS
24 (GTE'S MANATEE, SARASOTA AND POLK COUNTY EXCHANGES OR SPRINT'S FT. MYERS
25 LATA) BE FORCED TO MAKE NUMBER CHANGES BE DECIDED ON AN EQUAL BASIS, E.G. A
26 LOTTERY OR COIN TOSS.

27

1 **Q. PLEASE EXPLAIN YOUR FIRST POINT THAT NUMBER EXHAUST MAY BE LESS IMMINENT**
2 **THAN THREATENED AND A LONGER PERMISSIVE DIALING SHOULD BE ALLOWED IF A**
3 **NUMBER CHANGE IS REQUIRED?**

4 A. OUR DESIRE FOR A LENGTHY PERMISSIVE DIALING INTERVAL IS PREDICATED IN PART ON
5 THE FACT THAT WE WILL HAVE TO "RE-PROGRAM" EVERY WIRELESS PHONE IN USE BY OUR
6 EXISTING CUSTOMERS AT THE COMMENCEMENT OF A PERMISSIVE DIALING PERIOD. ONLY
7 DIGITAL PHONES, WHICH WE COMMENCED OFFERING TO OUR CUSTOMERS IN 1998, ARE
8 REMOTELY REPROGRAMMABLE. WE MUST "HANDS ON" RE-PROGRAM EVERY ANALOG
9 CELLULAR PHONE IN USE, AND THE LOGISTICAL CHALLENGE OF MAINTAINING OUR
10 BUSINESS OPERATIONS AND RE-PROGRAMMING ALL THESE PHONES IS LESS DRAMATIC THE
11 LONGER THE CONVERSION PERIOD THAT IS ALLOWED. AS A SPRINT TELEPHONE CUSTOMER,
12 (PERHAPS THE LARGEST IN THE FT. MYERS LATA) WE ALSO HAVE ADMINISTRATIVE ISSUES
13 JUST LIKE OTHER CUSTOMERS OF REPROGRAMMING PBX'S, ELECTRONIC KEY SYSTEMS,
14 AUTOMATIC DIALERS AND DATA MODEMS, CHANGING STATIONARY AND BUSINESS CARDS
15 (OF APPROXIMATELY 300 EMPLOYEES), NOTIFYING OUR CUSTOMERS AND VENDORS,
16 INCLUDING ALL OF OUR ROAMING PARTNERS NATIONWIDE THAT MAY ENDEAVOR TO
17 MODIFY THEIR RECORDS SO THEIR CUSTOMERS ARE PROPERLY ADVISED HOW TO DEAL
18 WITH US WHEN THEY ARE TRAVELING TO OR IN OUR SERVICE AREA. WE BELIEVE A
19 MAJORITY OF OUR CUSTOMERS WOULD LIKewise WANT AS MUCH NOTICE AND TIME TO
20 IMPLEMENT ANY NPA CHANGE THAT MAY BE REQUIRED.

21 **Q. THAT EXPLAINS YOUR DESIRE FOR AN EXTENDED PERMISSIVE DIALING INTERVAL, WHY**
22 **DO YOU THINK THAT NUMBER EXHAUST MAY NOT BE IMMINENT?**

23 A. WE AND THE PUBLIC IN GENERAL ARE SKEPTICAL ABOUT THE PROSPECT OF NUMBER
24 EXHAUST WITHIN THE THREE YEAR OLD 941 AREA CODE. WE ANTICIPATE THAT THE
25 REALITY OF THE NEED FOR NUMBERING CHANGES HINGES ON THE USE OF RESERVATIONS
26 OF NNX CODES (10,000 NUMBER BLOCKS) BY VARIOUS WOULD BE COMPETITORS TO THE
27 INCUMBENT TELEPHONE COMPANIES, GTE AND SPRINT. THESE WOULD BE COMPETITORS,

1 INCLUDING WIRELESS CARRIERS, ARE FINDING IT NECESSARY TO DUPLICATE THE RATE
2 CENTERED LOCAL SERVICE AREAS WHICH THE INCUMBENT LOCAL EXCHANGE COMPANIES
3 (ILECS) UTILIZE BECAUSE ELSEWISE THE ILECS WANT TOLL OR REVERSE OPTION CHARGES
4 (ROC) TO CONNECT THEIR CUSTOMERS TO THOSE OF COMPETING PROVIDERS EVEN THOUGH
5 THE PHYSICAL CONNECTION OF THE CALLED AND CALLING PARTY IS TYPICALLY
6 OCCURRING WITHIN THE SAME GEOGRAPHIC BOUNDARIES AS THE ILECS "LOCAL SERVICE
7 AREA" FOR ITS CUSTOMERS. NOWHERE HAVE I EVER READ, THAT THE CONGRESS, THE FCC,
8 OR THE STATE UTILITY AUTHORITY HAD MANDATED THAT EACH AND EVERY WOULD BE
9 COMPETITOR OF THE ILECS MUST OPERATE WITH THE "EXCHANGE BOUNDARIES"
10 ESTABLISHED BY THE ILECS UNDER MONOPOLY FRANCHISE CONDITIONS. YET THE ILECS
11 ARE CLEARLY FORCING THESE NEEDLESS DUPLICATIONS IN ORDER TO DETER GENUINE
12 COMPETITIVE CONDITIONS FROM REACHING THE MARKETPLACE.

13 **Q. ISN'T THE FPSC ALREADY LOOKING INTO NUMBER CONSERVATION AND USE?**

14 A. DURING THE COMMISSIONS ONLY TO DATE WORKSHOP ON THE ISSUE OF NUMBER
15 CONSERVATION FEBRUARY 23, 1999, WE (I) OFFERED TO THE COMMISSION STAFF THAT WE
16 ARE WILLING TO SHARE NNX CODES (IN THOUSAND NUMBER BLOCKS) WITH OTHER WOULD
17 BE USERS. WE RENEW THAT OFFER. A QUERY OF OTHER PARTIES ASSIGNED NNX'S OR
18 CONTEMPLATING NNX ASSIGNMENTS IN THE 941 NUMBERING PLAN AREA (NPA) MAY
19 DEMONSTRATE THAT NUMEROUS PARTIES ARE LIKEWISE WILLING TO SHARE NNX CODES,
20 THEREBY DELAYING THE EXHAUST WITHIN THE 941 NPA.

21 THE COMMISSION SHOULD EXPLORE THIS POTENTIAL BEFORE ENDORSING A RAPIDLY
22 IMPLEMENTED SPLIT IN NPA'S IN THIS DOCKET, WHICH MAY LACK ANY REAL URGENCY.

23 I WAS THE ONLY PARTICIPANT TO THAT WORKSHOP THAT MENTIONED THE WIRELESS
24 INDUSTRY'S ROLE IN NUMBER UTILIZATION AND EXHAUST. NOT ONE OF THE OTHER
25 PARTICIPANTS NOR THE PSC STAFF EVERY RESPONDED TO ANY OF MY COMMENTS IN THAT
26 WORKSHOP. THE PRINCIPAL POINT I TRIED TO RAISE IN THAT WORKSHOP IS THAT THE ILECS
27 ARE NEEDLESSLY FORCING THE WIRELESS INDUSTRY TO SEEK A MULTITUDE OF RATE

1 CENTERS IN ORDER FOR THEIR CUSTOMERS TO BE ABLE TO CALL THE WIRELESS
2 CUSTOMER FEE FREE.

3 **Q. WHAT IS YOUR BASIS FOR ASKING THE COMMISSION TO GIVE BOTH PARTIES TO THE**
4 **CURRENT GEOGRAPHIC SPLIT PROPOSAL EQUAL OPPORTUNITY TO AVOID A NUMBER**
5 **CHANGE?**

6 A. OUR DESIRE FOR EQUAL OPPORTUNITY TO AVOID A NUMBER CHANGE IS PREDICATED ON
7 THE CURRENT PROPOSAL TO SPLIT THE NPA'S (IN MAJORITY) BASED ON ILEC SERVICE
8 AREAS.

9 OUR BELIEF IS THAT BECAUSE MORE NNX CODES HAVE BEEN ASSIGNED IN THE GTE SERVICE
10 AREA THAN THE SPRINT AREA, THERE IS A MISPERCEPTION THAT THERE ARE MORE
11 NUMBERS IN USE, OR MORE POPULATION IN THE THREE GTE COUNTIES, VERSES THE NINE
12 SPRINT COUNTIES. WE DOUBT THERE IS ANY MATERIAL DIFFERENCE IN THE POPULATIONS
13 OR NUMBERS OF ACTIVE TELEPHONE NUMBERS BETWEEN THE TWO SERVICE AREAS, AND
14 WE KNOW THAT CHARLOTTE, COLLIER, AND LEE COUNTIES ARE GROWING AT A FASTER
15 RATE THAN THE GTE COUNTIES.

16 LACKING DEMONSTRABLE EVIDENCE THAT ONE AREAS NUMBER UTILIZATION IS
17 MATERIALLY DIFFERENT FROM ANOTHER, WE THINK THE COMMISSION SHOULD IGNORE THE
18 DISTINCTION IN THE NUMBERS OF RESERVED NNX'S IN THE RESPECTIVE MARKET AREAS.

19 **Q. DO YOU NOT BELIEVE AN NPA SPLIT IS REALLY REQUIRED AT THIS TIME?**

20 A. AS PREVIOUSLY STATED WE THINK THE PROSPECTIVE NNX CODE EXHAUST RESULTS FROM
21 THE ILECS REFUSAL TO WAIVE TOLL OR REVERSE OPTION CHARGES (ROC) WHEN ITS
22 CUSTOMER WANTS TO CALL ANOTHER CARRIER'S CUSTOMER ASSIGNED A PHONE NUMBER
23 THAT IS NOT "RATE CENTERED" WITHIN THE CALLING PARTIES ILEC LOCAL SERVICE AREA.
24 THE COMMISSION COULD FIND THAT SUCH PRACTICE IS CONTRARY TO THE PUBLIC
25 INTEREST, AND IMPLEMENT MEASURES WHICH PROVIDE COMPETING CARRIERS THE ABILITY
26 TO DETERMINE THEIR OWN "EXCHANGE" OR CALLING AREA BOUNDARIES WHICH REDUCES
27 THE NEED FOR SEPARATE NNX'S.

1 **Q. IS THERE AN ALTERNATIVE TO DUPLICATING NNX CODES TO ACHIEVE TWO WAY LOCAL**
2 **CALLING BETWEEN CUSTOMERS OF DIFFERENT CARRIERS WITHIN THE SAME**
3 **GEOGRAPHIC AREA?**

4 A. YES, BUT SPRINT IS UNWILLING TO ACQUIESCE TO A METHOD WE HAVE BEEN ADVOCATING
5 FOR YEARS.

6 **Q. WHAT METHOD DOES SPRINT UTILIZE AT THIS TIME?**

7 A. AT THIS TIME, AND AT ALL TIMES SINCE WE ACQUIRED FCC SERVICE RIGHTS TO THESE
8 MARKETS WE (HAVE) PROVIDE(D) SEVEN DIGIT TOLL FREE SERVICE WITHIN THE FT. MYERS
9 LATA TO BOTH THE CALLED AND CALLING PARTY. SPRINT HAS CHARGED THOUSANDS OF
10 DOLLARS IN ONE TIME CHARGES TO PROGRAM EACH OF THE WORKING NNX CODES
11 WIRELESS ONE USES TO ENABLE THE SEVEN DIGIT DIALING FEATURE. SPRINT PROVIDES NO
12 CHARGE LAND LINE CALLING TO OUR CELLULAR CUSTOMER FROM A SPRINT CONNECTED
13 CALLER ONLY IF THE CALLED NNX IS "RATE CENTERED" WITHIN THE TOLL FREE LOCAL
14 CALLING AREA OF THE CALLING PARTY. AS WE HAVE INDICATED WE DO NOT WANT SPRINT
15 TO CHARGE ITS CUSTOMER FOR CALLING OUR CUSTOMER. SPRINT CHARGES WIRELESS ONE
16 ROC WHENEVER THE SPRINT CONNECTED CALLER IS TRYING TO REACH A NNX CODE "RATE
17 CENTERED" OUTSIDE THE LOCAL CALLING AREA OF THE CUSTOMER.

18 **Q. WILL SPRINT NEGOTIATE ITS REVERSE OPTION CHARGE?**

19 A. NO. SPRINT REFUSED TO NEGOTIATE THE ROC FOUND IN THE SECTION OF ITS TARIFF
20 TITLED INTERCONNECTION OF SERVICES CHARGES IN THE COURSE OF NEGOTIATIONS
21 PERMITTED BY THE TELECOMMUNICATIONS ACT OF 1996, AND BECAUSE THEY WOULD NOT
22 NEGOTIATE THIS ISSUE WIRELESS ONE BECAME THE FIRST WIRELESS CARRIER TO
23 PROSECUTE AN ARBITRATION REQUEST BEFORE THE FPSC. THE COMMISSION, WHILE
24 COMMENDING ILECS THAT HAD BEEN WILLING TO "NEGOTIATE" CALL COMPLETION TERMS
25 FOR REACHING WIRELESS NNX'S RATE CENTERED OUTSIDE THE CALLING PARTIES
26 CUSTOMARY LOCAL CALLING AREA RULED THAT THIS EXCHANGE OF REVENUES BETWEEN
27 OUR COMPANIES WAS NOT SUBJECT TO ARBITRATION. WE FEAR THAT RULING REINFORCES

1 SPRINTS DEMAND THAT ANY WIRELESS COMPETITOR TO THE INCUMBENT TELEPHONE
2 COMPANY MUST OBTAIN AND MARKET PHONE NUMBERS RATE CENTERED IN EVERY ILECS
3 DEFINITION OF THEIR LOCAL CALLING AREA, OR CAUSE THE INCURRENCE OF TOLL CHARGES
4 OR ROC'S, AND WE KNOW THAT THIS IS CONTRIBUTING TO THE PROSPECTIVE NNX CODE
5 EXHAUST INEVITABLY NECESSITATING USE OF ADDITIONAL NUMBERING PLAN AREAS
6 CODES, WHICH TOO WILL INEVITABLY EXHAUST

7 **Q. WHAT METHOD DOES WIRELESS ONE ADVOCATE?**

8 A. WE HAVE ASKED SPRINT BOTH PRIOR AND SUBSEQUENT TO OUR ARBITRATION WITH THEM
9 TO PROVIDE US WITH DISTRIBUTED NNX SERVICE WHICH WOULD ALLOW THE USE OF THE
10 LEASED LINE CONNECTIONS WE HAVE WITH VARIOUS OF ITS END OFFICES WHENEVER ITS
11 CUSTOMER IS CALLING FROM WITHIN THE LOCAL CALLING AREA OF A POINT OF
12 INTERCONNECTION (POI) WE MAINTAIN WITH THEM. THE USE OF DISTRIBUTED NNX CODES
13 WHICH RECOGNIZE A SINGLE INTERLATA RATE CENTER BUT ALLOW FOR MULTIPLE LOCAL
14 CALLING AREAS FOR THE SAME NNX CODE GREATLY DIMINISHES THE NEED FOR NNX
15 CODES SINCE THE CARRIER UTILIZING DISTRIBUTED NNX CODES TYPICALLY ONLY
16 REQUIRES ADDITIONAL CODES WHEN AVAILABLE NUMBER EXHAUST IS IN PROSPECT.
17 WIRELESS ONE TESTIFIED TO IT'S PREVIOUS SUCCESSFUL USE OF SUCH CODES WITH
18 AFFILIATED CELLULAR OPERATIONS IN ITS ARBITRATION PROCEEDING WITH SPRINT -
19 DOCKET 971194-TP. DISTRIBUTED NNX'S ARE READILY PROGRAMMABLE CALL ROUTING
20 (AND CONSEQUENTLY BILLING) DIRECTIONS. WE HAVE STIPULATED WE WOULD PAY ALL
21 NON-RECURRING TRANSLATION COSTS FOR EFFECTING SUCH CALL ROUTING AND WOULD
22 CONTINUE TO PAY REVERSE OPTION RATES FOR ALL CALLS SPRINT CAN NOT COMPLETE
23 OVER AVAILABLE LOCAL CONNECTIONS, INCLUDING OVERFLOWS THAT CAN NOT
24 COMPLETE BECAUSE OF A SHORTAGE OF CONNECTING CIRCUITS, OR CALLS THAT CAN NOT
25 BE COMPLETED BECAUSE OF OUT OF SERVICE CONDITIONS OF THE CONNECTING PATHS
26 WHICH ARE OUR FAULT. (OBVIOUSLY SPRINT SHOULD DELIVER CALLS VIA ITS TANDEM
27 WITHOUT ROC WHEN IT IS RESPONSIBLE FOR THE OUT OF SERVICE CONDITION.)

1 Q. IN ADDITION TO THE OBVIOUS NNX CODE CONSERVATION EFFECT, WHY IS WIRELESS
2 ONE SO ENTHUSIASTIC FOR "DISTRIBUTED NNX'S"?

3 A. NATURALLY, WE ASKED THAT WHEN SPRINT CONNECTS TO US WITHIN THE LOCAL CALLING
4 AREA OF ITS CUSTOMER, NO REVERSE OPTION CHARGE BE APPLIED SINCE ABSENT THE
5 COMPANYS TRANSPORT OF A CALL TO ITS TANDEM, AND THE SUBSEQUENT TANDEM
6 SWITCH COMPLETION THERE IS NO BASIS FOR THE APPLICATION OF TOLL (SUBSTITUTE)
7 CHARGES.

8 Q. WOULD YOU CONSIDER THE USE OF A MODIFIED "DISTRIBUTED NNX " PLAN?

9 A. ALTERNATIVELY, BUT WITH MUCH LESS ENTHUSIASM, WE WOULD BE RESIGNED TO
10 ACCEPTING DIRECT CONNECTION FROM THEIR CUSTOMERS ONLY FROM ORIGINATING END
11 OFFICES WITH WHICH WE HAVE DIRECT CONNECTION, SUBJECT TO THE AVAILABILITY OF
12 FACILITIES.

13 EITHER PROPOSAL WOULD REDUCE THE UNREASONABLE LEVEL OF REVENUE SPRINT
14 OBTAINS CONNECTING ITS CUSTOMER TO OURS.

15 Q. WHY DO YOU THINK SPRINT REFUSES TO PROVIDE DISTRIBUTED NNX SERVICE PER
16 YOUR REQUESTS?

17 A. SPRINT HAS ADAMANTLY REFUSED, INSISTING THAT IT IS THEIR CUSTOMER PLACING THE
18 CALL TO A "RATE CENTER" OUTSIDE THEIR CUSTOMERS LOCAL CALLING AREA, AND THEY
19 ARE ENTITLED TO CHARGE SAID CUSTOMER, OR COLLECT A "PROXY" THEREOF. THEY WANT
20 THE REVENUE FROM US (OR THEIR CUSTOMER). BUT SPRINT IS AWARE INSO FAR AS OUR
21 CUSTOMERS THAT THE MAJORITY OF SUCH CALLS ARE IN FACT COMPLETED BETWEEN
22 PARTIES THAT ARE PHYSICALLY WITHIN THE SAME LOCAL CALLING AREA THROUGHOUT
23 THE LENGTH OF THEIR CONVERSATION. SPRINT IS ALSO AWARE THAT THE USAGE BETWEEN
24 ITS CUSTOMERS AND OURS IS A "WINDFALL OF NEW BUSINESS" THAT DIDN'T EXIST A
25 DECADE AGO. THE CHARGES AND FEES IT COLLECTS FROM US IRRESPECTIVE OF REVERSE
26 OPTION SHOULD DOUBTLESSLY BE PROVIDING A SUBSIDY OF REVENUE TO ENABLE IT TO
27 KEEP IT CHARGES FOR BASIC SERVICE BELOW THE TRUE COST THEREBY PROTECTING ITS

1 "ECONOMIC MONOPOLY" FOR BASIC SERVICES. I BELIEVE THAT SPRINTS OBJECTIVE IN
2 DENYING DISTRIBUTED NNX'S HAS GOT TO BE THE DETERRING EFFECT SUCH CHARGES
3 HAVE ON COMPETITIVE GROWTH.

4 **Q. AREN'T SPRINT TOLL OR REVERSE OPTION CHARGES TO YOU COST BASED?**

5 A. IT IS FALLACIOUS FOR SPRINT TO DEFEND ITS REVERSE OPTION CHARGE AS COST BASED.
6 SPRINTS REVERSE OPTION CHARGES ARE NOT COST BASED; AS EXAMPLES:

- 7 • THE TRANSPORT OF A CALL FROM A SPRINT CUSTOMER OF ITS FT. MYERS EXCHANGE TO A
8 WON CUSTOMER WITH A NAPLES OR PORT CHARLOTTE RATE CENTERED NNX IS IDENTICAL
9 TO ITS COST OF COMPLETION OF A CALL TO A FT. MYERS RATE CENTERED NNX; REVERSE
10 OPTION CHARGES APPLY TO CALLING THE NAPLES OR PORT CHARLOTTE NUMBER, BUT NOT
11 TO THE FT. MYERS NUMBER.
- 12 • THE TRANSPORT OF A CALL FROM A SPRINT CUSTOMER ON CAPTIVA ISLAND TO A WON
13 CUSTOMER WITH A FT. MYERS RATE CENTERED NNX IS VERY SIMILAR TO THE TRANSPORT
14 OF ONE FROM BOCA GRANDE; SPRINT DELIVERS THE ONE FROM CAPTIVA WITHOUT CHARGE
15 BUT IMPOSES A REVERSE OPTION CHARGE ON THE ONE FROM BOCA GRANDE.
- 16 • SPRINT CHARGES US A REVERSE OPTION FEE FOR ITS AVON PARK CUSTOMER CALL TO OUR
17 SEBRING RATE CENTERED NNX, ALTHOUGH NO INTEROFFICE TRANSPORT IS INVOLVED IN
18 THE DELIVERY OF SAID CALL; THERE IS NO CHARGE TO COMPLETE A CALL WITH
19 INTEROFFICE TRANSPORT COSTS FROM ITS SEBRING OR SPRING LAKE EXCHANGE
20 CUSTOMERS WHICH TRANSPORTS BACK TO ITS AVON PARK POI WITH US.

21 MOST SIGNIFICANTLY

- 22 • THE ROUTING OF CALLS DOESN'T CHANGE ONE IOTA IF WE GET ADDITIONAL NNX CODES
23 WITH DIFFERENT RATE CENTERS AND SPRINTS COSTS WILL REMAIN IDENTICAL TO THE
24 PRESENT COSTS EVEN IF WE GET NEW NNX'S FOR ALL THE COMMUNITIES (EXCHANGE AREAS
25 OR LOCAL SERVICE AREAS) THAT WE CAN'T REACH FEE FREE. SPRINT WILL GIVE UP ALL
26 THE REVENUE ASSOCIATED WITH COMPLETING CALLS FROM THEIR LANDLINE CALLER TO
27 OUR CUSTOMER RATE CENTERED IN THE LOCAL CALLING AREA OF THEIR CUSTOMER, BUT

1 IT'S COSTS WON'T CHANGE AT ALL BECAUSE IT WILL CONTINUE TO ROUTE THE CALLS IN
2 EXACTLY THE SAME MANNER. (SPRINT WILL OF COURSE BE ABLE TO COLLECT SOME
3 OFFSETTING REVENUES WHEN THEIR CUSTOMER CALLED A WIRELESS CUSTOMER WITH A
4 RATE CENTER OUTSIDE THEIR CUSTOMERS LOCAL CALLING AREA; WE ESTIMATE THAT IS
5 LESS THAN 10% OF ALL CALLS). THE PRINCIPAL TANGIBLE DIFFERENCE IN COMPLETING
6 CALLS WILL BE THE EXHAUST OF ADDITIONAL NNX CODES.

7 **Q. SHOULD SPRINT BE REQUIRED TO COMPLETE CONNECTIONS TO OTHER CARRIERS OVER**
8 **INTERCONNECTION FACILITIES WITHIN THE LOCAL CALLING AREA OF THE**
9 **ORIGINATING PARTY AT NO CHARGE TO EITHER ITS CUSTOMER OR THE ALTERNATE**
10 **CARRIER.**

11 A. YES IT SHOULD SO LONG AS THE OTHER CARRY COMPENSATES SPRINT FOR ANY UNUSUAL
12 TRANSLATION COSTS. WIRELESS ONE ALREADY HAS DIRECT TERMINATING END OFFICE
13 INTERCONNECTION FACILITIES WITH SPRINT WHICH ACCOUNT FOR OVER 80% OF
14 ORIGINATING INTRALATA MINUTES OF USE (MOU) TO SPRINT CUSTOMERS OR THOSE OF
15 ALTERNATE (ALECS, CELLULAR, PAGING, AND PCS) CARRIERS. IF WE SUBTRACTED OUT THE
16 ALTERNATE CARRIER MOU IT MIGHT BE OVER 90%. IF SPRINT ALLOWED THE USE OF THESE
17 EXISTING FACILITIES ON A TWO WAY BASIS THIS WOULD GREATLY MITIGATE THE DEMAND
18 FOR ADDITIONAL NNX CODES. IT WOULD ALSO ELIMINATE AN ESTIMATED 85% OF OUR NET
19 INTERCONNECTION COST FOR USAGE BASED ON CURRENT TRAFFIC VOLUMES.

20 **Q. PLEASE EXPLAIN HOW WIRELESS ONE CURRENTLY UTILIZES ITS ASSIGNED NNX CODES.**

21 A. MY REPLY REQUIRES THE PROVISION OF BACKGROUND INFORMATION OF HOW WE
22 CURRENTLY DO BUSINESS. THROUGH THIS POINT IN TIME WITHIN THE FT. MYERS LATA WE
23 HAVE FOUR 'HOME AREA MARKETS' CORRESPONDING TO THE FCC LICENSE AREAS:

- 24 ■ FT. MYERS - A METROPOLITAN STATISTICAL AREA CONSISTING OF LEE COUNTY
- 25 ■ NAPLES - A RURAL STATISTICAL AREA CONSISTING OF COLLIER AND HENDRY COUNTIES
- 26 ■ SEBRING - A RSA CONSISTING OF GLADES AND HIGHLANDS COUNTIES, AND

1 ■ PORT CHARLOTTE - A RSA CONSISTING OF CHARLOTTE, DESOTO, AND HARDEE COUNTIES
2 ALL OF OUR CALLING PLANS HAVE ALWAYS PROVIDED FOR TOLL FREE OUTBOUND CALL
3 COMPLETION THROUGHOUT THE FT. MYERS AND TAMPA LATAS BY OUR WIRELESS
4 CUSTOMER. INBOUND CALLS TO OUR CUSTOMER ARE TOLL FREE TO THE CALLING PARTY
5 LATAWIDE (WITHIN THE FT. MYERS OR TAMPA LATA DEPENDING ON THEIR PHONE NUMBER
6 - BUT NOT BOTH), AND THERE IS NO PREMIUM CHARGED TO THE CALLED PARTY FOR SAID
7 INBOUND CALLS WHETHER OR NOT THEY GENERATE "REVERSE OPTION" CHARGES TO US AS
8 A CARRIER.

9 WITH EXCEPTION FOR ITS MENTION IN OUR ARBITRATION PROCEEDING THIS IS THE FIRST
10 TIME WE HAVE GIVEN OUR CUSTOMERS AND THE GENERAL PUBLIC OF OUR FRANCHISE
11 AREA THE OPPORTUNITY TO KNOW AND UNDERSTAND THAT WIRELESS CARRIERS DO NOT
12 ENJOY DIFFERENT INBOUND CALLING PRIVILEGES FROM THOSE OF LANDLINE CUSTOMERS.
13 INTERCOMPANY MOBILE-TO MOBILE USE IS ALWAYS CHARGED TO THE CALLING PARTY.
14 HOWEVER, THE CALLED (WON) PHONE NUMBER IS ONLY CHARGED IF THE CALLED PARTY IS
15 OUTSIDE THE HOME MARKET OF THE CALLING PARTY. (OUR MOBILE TO MOBILE RATES ARE
16 LESS THAN OUR MOBILE TO LAND OR LAND TO MOBILE RATES.)

17 IN MANY INSTANCES, THE CELLULAR CALLER'S CONVERSATION TIME IS DEDUCTED FROM
18 THE "PACKAGE OF MINUTES" ASSOCIATED WITH THE CHOSEN CALLING PLAN; ELSEWISE OR
19 IF THE CUSTOMER HAS EXCEEDED THE ALLOWANCE PER MINUTE RATES APPLY BUT SAID
20 RATES ARE UNIFORM FOR THAT CUSTOMER LATAWIDE (SOMETIMES DEPENDING ON TIME OF
21 DAY). CELLULAR ONE DOES NOT PROVIDE UNLIMITED FLAT RATE CALLING DURING THE 7
22 A.M. TO 7 P.M. WEEKDAY PEAK PERIOD BUT DOES SO NIGHTS AND WEEKENDS FOR
23 CUSTOMERS ELECTING THIS SERVICE OPTION.

24 AT THIS TIME WE HAVE JUST ONE RATE CENTER REPRESENTING THE LARGEST POSSIBLE
25 LOCAL CALLING AREA ASSOCIATED WITH EACH OF THE FOUR MARKETS. EACH MARKET
26 HAS A NNX CODE IN USE IN CONNECTION WITH PREPAID CELLULAR SERVICE.

27 ADDITIONALLY WE HAVE 7 OTHER FT. MYERS "RATE CENTERED" NNX'S, 7 ADDITIONAL

1 NORTH NAPLES "RATE CENTERED" NNX'S, 2 ADDITIONAL SEBRING "RATE CENTERED" NNX'S,
2 AND 4 ADDITIONAL PORT CHARLOTTE "RATE CENTERED" NNX'S. THIS COULD BE ENOUGH
3 TELEPHONE NUMBERS TO LAST US SEVERAL YEARS WERE IT NOT FOR THE HIGH
4 INTERCONNECTION COST FOR ROC MOUS.

5 **Q. PLEASE DESCRIBE THE CALLING PRIVILEGES AND PERCEIVED NEED FOR ADDITIONAL**
6 **NNX NUMBERS IN YOUR FT. MYERS MARKET.**

7 A. OUR FT. MYERS EXCHANGE RATE CENTERED NNX'S CAN BE CALLED TOLL FREE FROM ALL
8 OF LEE COUNTY EXCEPT FROM (THE LEE COUNTY PORTIONS OF) THE BOCA GRANDE AND
9 IMMOKALEE EXCHANGES FROM WHICH WE INCUR A REVERSE OPTION CHARGE IN LIEU OF
10 SPRINT CHARGING THE CALLER. HOWEVER, WHENEVER A SPRINT FT. MYERS LATA
11 CUSTOMER FROM OUTSIDE OF LEE COUNTY WANTS TO REACH OUR CUSTOMER ASSIGNED A
12 FT. MYERS RATE CENTERED TELEPHONE NUMBER WE INCUR A REVERSE OPTION CHARGE
13 PER MINUTE OF USE. SPRINT DEFENDS ITS REVERSE OPTION CHARGE AS APPROPRIATE
14 BECAUSE IT TRANSPORTS THE CALL ATTEMPT TO ITS FT. MYERS TANDEM FOR DELIVERY TO
15 US OVER LEASED FACILITIES WHICH CONNECT TO OUR TANDEM OFFICE. IN ORDER FOR OUR
16 BOCA GRANDE AND IMMOKALEE EXCHANGE (LEE COUNTY) BASED CUSTOMERS TO RECEIVE
17 SPRINT DELIVERED REVERSE OPTION FREE PHONE CALLS FROM THEIR NEIGHBORS WITHIN
18 SPRINTS BOCA GRANDE AND IMMOKALEE EXCHANGES, HOWEVER, WE REQUIRE BOTH
19 BOCA GRANDE AND IMMOKALEE RATE CENTERED NNX NUMBERS AVAILABLE TO OUR
20 CUSTOMERS.

21 **Q. PLEASE DESCRIBE THE CALLING PRIVILEGES AND PERCEIVED NEED FOR ADDITIONAL**
22 **NNX NUMBERS IN YOUR NAPLES MARKET.**

23 A. OUR NORTH NAPLES EXCHANGE RATE CENTERED NNX'S LOCAL CALLING AREA
24 ENCOMPASSES ALL OF COLLIER COUNTY EXCEPT SPRINTS EVERGLADES AND IMMOKALEE
25 EXCHANGES, BUT EXCLUDES ALL OF HENDRY COUNTY WHICH IS SERVED BY THE LABELLE
26 AND CLEWISTON EXCHANGES AND A PORTION OF THE LEHIGH ACRES EXCHANGE. THIS
27 RESULTS IN "REVERSE OPTION CHARGES FOR EVERY CALL ORIGINATED BY ITS CLEWISTON,

1 EVERGLADES, (HENDRY COUNTY) LEHIGH ACRES, IMMOKALEE, AND LABELLE EXCHANGE
2 CUSTOMERS WITHIN THE FCC DEFINED CELLULAR SERVICE AREA, AND FROM EVERY
3 ADDITIONAL FT. MYERS LATA EXCHANGE OUTSIDE THE FL RSA 1 SERVICE AREA, EXCEPT
4 BONITA SPRINGS IN SOUTHERN LEE COUNTY WHICH IS INCLUDED AS LOCAL CALLING AREA
5 FOR EITHER ITS NORTH NAPLES OR NAPLES RATE CENTERS. IN ORDER FOR OUR CLEWISTON,
6 EVERGLADES, IMMOKALEE, AND LABELLE CUSTOMERS TO RECEIVE SPRINT DELIVERED
7 REVERSE OPTION FREE PHONE CALLS FROM THEIR NEIGHBORS WITHIN THE LOCAL CALLING
8 AREA OF EACH OF THESE FOUR EXCHANGE AREAS HOWEVER, WE REQUIRE DIFFERENT
9 NNX'S FROM THOSE IN USE FOR EACH OF THESE AREAS.

10 **Q. PLEASE DESCRIBE THE CALLING PRIVILEGES AND PERCEIVED NEED FOR ADDITIONAL**
11 **NNX NUMBERS IN THE SEBRING MARKET.**

12 A. OUR SEBRING EXCHANGE RATE CENTERED NNX'S LOCAL CALLING AREA CONSISTS OF
13 SPRINTS SEBRING AND SPRING LAKE EXCHANGES, EXCLUDING (THE PORTION OF) THE
14 ARCADIA AND (ALL OF) THE AVON PARK AND LAKE PLACID EXCHANGES IN HIGHLANDS
15 COUNTY AND (THE PORTIONS OF) THE LABELLE AND CLEWISTON AND (ALL OF) THE MOORE
16 HAVEN EXCHANGES WITHIN GLADES COUNTY. IN ORDER FOR OUR CUSTOMERS OF THESE
17 AREAS OUTSIDE SPRINTS SEBRING OR SPRING LAKE EXCHANGES TO RECEIVE REVERSE
18 OPTION FREE PHONES CALLS FROM THEIR NEIGHBORS WE MUST HAVE NNX NUMBERS FOR
19 EACH OF THESE AREAS. IN ORDER TO PROVIDE PARITY WITH SPRINTS SEBRING EXCHANGE
20 LOCAL CALLING AREA WE MUST ALSO HAVE OKEECHOBEE AND WACHULA EXCHANGE NNX
21 NUMBERS AVAILABLE FOR USE.

22 **Q. PLEASE DESCRIBE THE CALLING PRIVILEGES AND PERCEIVED NEED FOR ADDITIONAL**
23 **NNX NUMBERS FOR YOUR PORT CHARLOTTE MARKET.**

24 A. OUR PORT CHARLOTTE EXCHANGE RATE CENTERED NNX'S LOCAL CALLING AREA CONSISTS
25 OF SPRINTS PORT CHARLOTTE AND PUNTA GORDA EXCHANGES IN CHARLOTTE COUNTY, BUT
26 EXCLUDES (THE PORTION OF) ITS BOCA GRANDE AND (ALL OF) ITS CAPE HAZE EXCHANGES
27 IN CHARLOTTE COUNTY, ITS ARCADIA EXCHANGE IN DESOTO COUNTY (AND A PORTION OF

1 HIGHLANDS COUNTY), AND ITS BOWLING GREEN, WACHULA, AND ZOLFO SPRINGS
2 EXCHANGES IN HARDEE COUNTY. ADDITIONALLY, SPRINT WILL NOT COMPLETE CALLS
3 FROM OUR CUSTOMERS TO GTE'S NORTHPORT EXCHANGE AS PART OF OUR PORT
4 CHARLOTTE LOCAL CALLING AREA, AS IT DOES FOR ITS CUSTOMERS, AND GTE WOULD ONLY
5 COMPLETE REVERSE OPTION FREE CALLS FROM ITS NORTHPORT EXCHANGE CUSTOMERS TO
6 OUR CUSTOMERS WITHIN THEIR NORTH PORT EXCHANGE LOCAL CALLING AREA IF WE
7 UTILIZED A NNX RATE CENTERED WITHIN THE NORTHPORT LOCAL CALLING AREA THAT
8 THEY COULD DELIVER TO US VIA DIRECT CONNECTION WITH THEM. THIS REQUIRES THAT
9 FOR ARCADIA, BOCA GRANDE, BOWLING GREEN, CAPE HAZE, WACHULA, OR ZOLFO SPRINGS
10 CUSTOMERS TO RECEIVE REVERSE OPTION FREE PHONE CALLS FROM THEIR NEIGHBORS IN
11 EACH OF THESE RESPECTIVE EXCHANGES, WE HAVE SEPARATE RATE CENTERED NUMBERS
12 FOR EACH OF THESE TELEPHONE COMPANY DEFINED EXCHANGE AREAS. SPRINT'S CAPE
13 HAZE EXCHANGE HAS TOLL FREE CALLING WITH GTE'S ENGLEWOOD EXCHANGE BUT SPRINT
14 WOULD NOT PROVIDE CONNECTION OF WIRELESS ONE CAPE HAZE RATE CENTERED
15 CUSTOMERS TO GTE. THEREFOR A REQUIREMENT FOR A NNX NUMBERS WITHIN THE LOCAL
16 CALLING AREA OF GTE'S ENGLEWOOD EXCHANGE CUSTOMERS VIA DIRECT CONNECTION
17 BETWEEN GTE AND WON ALSO EXISTS IN THE CONTEXT OF OUR OBTAINING CALLING AREA
18 PARITY WITH SPRINT. THUS WE REQUIRE BOTH ENGLEWOOD AND NORTHPORT NNX
19 NUMBERS FROM GTE TO BE ABLE TO MATCH SPRINT LOCAL CALLING AREAS FOR ITS
20 CHARLOTTE COUNTY CUSTOMERS.

21 **Q. DOES WIRELESS ONE PERCEIVE THE NEED FOR ADDITIONAL FEE FREE LOCAL CALLING**
22 **IN THE ABOVE MENTIONED LOCAL CALLING AREA?**

23 **A.** AS INDICATED OUR FOUR EXISTING "RATE CENTERS" REPRESENT THE LARGEST LOCAL
24 CALLING AREA IN EACH OF OUR FOUR FCC AUTHORIZED MARKET AREAS AND ALL OUR
25 WORKING NNX CODES CURRENTLY PROVIDE FOR REVERSE OPTION CALLING NEVER THE
26 LESS. ROC'S AT 12.29% OF OUR BILLED MINUTES CONSTITUTED 86.37 % OF OUR NET COST OF
27 USAGE RELATED INTERCONNECTION COSTS IN FEBRUARY, 1999. THIS SUBSTANTIAL COST

1 INEVITABLY IS RECOVERED THROUGH THE RATES WE CHARGE ALL OUR CUSTOMERS
2 IRRESPECTIVE OF THEIR PROPORTIONATE SHARE OF ROC COST THEY CAUSE US.
3 THE NOTION OF INTRODUCING PREMIUM CHARGES FOR THE RECEIPT OF INBOUND CALLS
4 AFTER NINE YEARS OF WAIVING THEM SEEMS UNTENABLE. CONSEQUENTLY WON
5 MANAGEMENT IS PROPOSING THE INTRODUCTION OF ALTERNATIVE LOCAL SERVICE AREA
6 RATE PLANS WHICH WILL NOT HAVE REVERSE OPTION PRIVILEGES.

7 **Q. TO ACHIEVE THE ABILITY TO PROVIDE FREE (OR EXPANDED NON-TOLL) LOCAL CALLING**
8 **CALL COMPLETIONS CAPABILITIES FOR YOUR CUSTOMERS COMPARABLE TO SPRINT,**
9 **HOW MANY ADDITIONAL NNX CODES (OR PORTIONS THEREOF) DOES WIRELESS ONE**
10 **REQUIRE?**

11 FOUR ADDITIONAL NNX CODES CORRESPONDING TO THE IN USE RATE CENTERS AND 12
12 ADDITIONAL NNX CODES(OR PORTIONS THEREOF) REPRESENTING NEW RATE CENTERS ARE
13 REQUIRED TO SIMPLY CREATE THE ABILITY FOR SPRINT CUSTOMERS OF ITS EXCHANGES
14 WITHIN OUR SERVICE FRANCHISE BOUNDARIES TO REACH OUR CUSTOMERS TOLL FREE ON A
15 PAR WITH THEIR ABILITY TO CALL SPRINT CUSTOMERS TOLL FREE. IN ADDITION TO
16 ADDITIONAL FT. MYERS, NAPLES, PORT CHARLOTTE, AND SEBRING RATE CENTERED NNX
17 CODES WE WILL REQUIRE ARCADIA, AVON PARK, BOCA GRANDE, CAPE HAZE, CLEWISTON,
18 EVERGLADES, IMMOKALEE, LABELLE, LAKE PLACID, MOORE HAVEN, OKEECHOBEE, AND
19 WACHULA RATE CENTERED NUMBERS FOR USE. TWO ADDITIONAL NUMBER GROUPS RATE
20 CENTERED AT ENGLEWOOD AND NORTHPORT ARE REQUIRED TO ENABLE GTE CUSTOMERS
21 TO REACH OUR CHARLOTTE COUNTY CUSTOMERS THAT RESIDE IN THE SPRINT SERVICE
22 AREAS WHICH GTE CUSTOMERS CAN CALL TOLL FREE. THE DUPLICATION OF LOCAL
23 SERVICE CALLING PRIVILEGES OF SPRINT CUSTOMERS, ALSO REQUIRES AT A MINIMUM,
24 THAT WE ADD NNX NUMBERS FOR BONITA SPRINGS WHICH IS THE ONLY EXCHANGE WITH
25 TOLL FREE SERVICE TO BOTH FT. MYERS AND NAPLES, AND PUNTA GORDA, WHICH HAS
26 EXTENDED LOCAL CALLING PRIVILEGES WITH NUMEROUS LEE COUNTY EXCHANGES,
27 INCLUDING CAPE CORAL, FT. MYERS, NORTH CAPE CORAL AND NORTH FT. MYERS, IN

1 ADDITION TO ITS REGULAR LOCAL CALLING PRIVILEGES WITH NORTHPORT AND PORT
2 CHARLOTTE. SEPARATE NNX NUMBERS RATE CENTERED IN EACH OF THESE LOCAL CALLING
3 AREAS ARE ALSO REQUIRED. THE UTILIZATION OF 20 ADDITIONAL NNX CODES(ALL OR
4 PORTIONS OF), WHICH COULD REPRESENT UP TO 200,000 ADDITIONAL PHONE NUMBERS (AT
5 LEAST TEMPORARILY) UNAVAILABLE FOR USE BY ANYONE BUT OUR CUSTOMERS.

6 **Q. COULD WIRELESS ONE AVOID THE REQUIREMENT FOR ALL OR A PORTION OF THESE 20**
7 **ADDITIONAL NNX CODES?**

8 A. THE (PERMITTED) USE OF DISTRIBUTED NNX'S - ALLOWING THE COMPLETION OF A SPRINT
9 CUSTOMER CALL TO A WIRELESS ONE CUSTOMER OVER EXISTING POINTS OF
10 INTERCONNECTION WITHIN THE TOLL FREE CALLING AREA OF THE CALLING PARTY WOULD
11 REDUCE WIRELESS ONES REVERSE OPTION CHARGES BY AN ESTIMATED 98 PERCENT.(ONLY
12 CAPE HAZE, EVERGLADES, FT. MEADE, LAKE PLACID, MOORE HAVEN, AND OKEECHOBEE
13 EXCHANGE SPRINT CUSTOMERS WOULD HAVE TO UTILIZE REVERSE OPTION AT THIS TIME.)
14 WIRELESS ONE COULD ADD POINTS OF INTERCONNECTION FOR THESE END
15 OFFICE/EXCHANGES IF/WHEN TRAFFIC VOLUMES ACCELERATE SO AS TO MAKE LEASED LINE
16 CONNECTIONS TO EACH COST EFFECTIVE. MORE IMPORTANTLY IT WOULD OBLVIATE THE
17 NEED WIRELESS ONE NOW PERCEIVES TO HAVE ADDITIONAL RATE CENTERS TO PROVIDE
18 LOCAL CALLING ACCESS FOR ALL OF THOSE EXCHANGES FOR WHICH SPRINT CURRENTLY
19 INSISTS WE PAY REVERSE OPTION CHARGES IN ORDER FOR ITS CUSTOMER TO REACH ONE OF
20 OUR CUSTOMERS WITHIN THE SAME GEOGRAPHIC VICINITY- WHICH TYPICALLY
21 CORRESPONDS WITH THE SAME LOCAL CALLING AREA.

22 **Q. ABSENT THE AVAILABILITY OF DISTRIBUTED NNX'S, WILL WIRELESS ONE INCREASE THE**
23 **QUANTITY OF "ASSIGNED" (OR RESERVED) NUMBERS IN USE WITHIN THE 941 NPA?**

24 A. WIRELESS ONE HAS ALREADY BEEN ASSIGNED BUT NOT YET IMPLEMENTED (18)
25 ADDITIONAL RATE CENTERED NNX'S FOR USE IN CONNECTION WITH PROSPECTIVE
26 ALTERNATIVE CALLING PLANS WHICH WILL NOT PROVIDE REVERSE OPTION TOLL FREE
27 SERVICE FOR THE CALLING LANDLINE CUSTOMER. WE REQUIRE AN NNX CODE (OR PORTION

1 THEREOF) RATE CENTERED IN THE EVERGLADES EXCHANGE SO WE CAN REDUCE THE COST
2 OF CONNECTING ITS RESIDENTS TO ONE ANOTHER. LIKEWISE FOR ARCADIA, AVON PARK,
3 BOCA GRANDE, CAPE HAZE, CLEWISTON, IMMOKALEE, LABELLE, LAKE PLACID, MOORE
4 HAVEN, OKEECHOBEE, AND WACHULA. IN ORDER TO PROVIDE SERVICES WITH NO REVERSE
5 OPTION REVERSE WITHIN THE WIDEST POSSIBLE NON-TOLL CALLING AREA WE ALSO
6 REQUIRE ADDITIONAL RATE CENTERS FOR BONITA SPRINGS, FT. MYERS, NAPLES, PORT
7 CHARLOTTE, PUNTA GORDA, AND SEBRING. SPRINT FT MEADE EXCHANGE CUSTOMERS AND
8 GTE ENGLEWOOD AND NORTHPORT EXCHANGE CUSTOMERS WILL STILL BE UNABLE TO
9 REACH ANY WON CUSTOMERS WITHOUT TOLL CHARGES UNLESS WE ORDER ADDITIONAL
10 NNX'S FOR THESE RATE CENTERS.

11 **Q. SO WIRELESS ONE INTENDS TO TAKE AN ADDITIONAL 18-21 NNX CODES REPRESENTING**
12 **180,000-210,000 NUMBERS OUT OF SERVICE?**

13 IRONICALLY, WE DO NOT EXPECT TO USE REQUIRE LARGE QUANTITIES OF NUMBERS FOR
14 THE MAJORITY OF THESE NEW NNX CODES. ABSENT A SIGNIFICANT COST DIFFERENCE
15 BETWEEN OUR CURRENT SERVICE PLANS, AND NEW ONES THAT DO NOT PROVIDE FOR
16 "REVERSE OPTION CALLING", THOUSANDS OF OUR EXISTING CUSTOMERS WILL BE CONTENT
17 TO RETAIN THEIR EXISTING PHONE NUMBERS. AS INDICATED, WE ARE WILLING TO SHARE
18 1,000 NUMBER BLOCKS WITHIN THESE NNX'S WITH OTHERS, OR MIGRATE TO EXISTING IN
19 USE NNX'S IF THE TIMING OF SUCH MIGRATIONS DOESN'T INTERFERE WITH OUR MARKETING
20 PLANS.

21 **Q. HOW SHOULD THE COMMISSION RESOLVE THIS PROCEEDING, THE PRIMARY INTENTS OF**
22 **WHICH ARE TO DECIDE HOW AND WHERE TO SPLIT THE EXISTING 941 AREA CODE?**

23 **A.** THE COMMISSION SHOULD ALSO MAKE INQUIRY AMONG ALL NNX ASSIGNEES WITHIN THE
24 941 AREA OF THEIR WILLINGNESS, AND ABILITY, TO SHARE NNX CODES, IN ORDER TO MORE
25 ACCURATELY DETERMINE THE PROSPECTIVE EXHAUST DATE OF AVAILABLE NNX CODES,
26 AND NUMBERS, AND SUBSEQUENTLY RULE FOR AN EXTENDED PERMISSIVE DIALING
27 INTERVAL BASED ON ITS FINDINGS. THE COMMISSION MAY SUBSEQUENTLY CONCLUDE

1 THAT A SPLIT IN AREA CODE IS WARRANTED BECAUSE IT COULD NOT CONDUCT A
2 RULEMAKING OF ITS OWN INITIATIVE THAT WILL ADDRESS NUMBER CONSERVATION AND
3 UTILIZATION ISSUES, INCLUDING CONSIDERATION OF THE USE OF DISTRIBUTED NNX CODES,
4 BEFORE THE AVAILABILITY OF NNX CODES IS EXHAUSTED. HOWEVER, EVEN IF SUCH A
5 RULING CAN NOT PRECEDE A RULING IN THIS PROCEEDING WE ENCOURAGE THE
6 COMMISSION TO INITIATE SUCH AN INVESTIGATION. THE PUBLIC INTEREST WARRANTS
7 CLOSE EXAMINATION OF ALL THE ISSUES INVOLVED WHICH WE BELIEVE DETER
8 MEANINGFUL COMPETITION IN LOCAL SERVICE TELECOMMUNICATIONS.

9 WE ALSO BELIEVE SUCH INFORMATION WILL DEMONSTRATE THE INTERVAL TO COMPLETE
10 AN NPA CONVERSION MAY AND SHOULD ALLOW A 12-15 MONTH CONVERSION INTERVAL.

11 **Q. WHICH CUSTOMERS SHOULD BE REQUIRED TO UNDERGO A CHANGE IN AREA CODE AS A**
12 **RESULT OF THIS PROCEEDING?**

13 A. IF THE POPULATIONS AND TELEPHONE NUMBERS IN USE IN EACH OF THE GTE AND SPRINT
14 AREAS WITHIN THE 941 NPA ARE NOT DRAMATICALLY DIFFERENT FROM ONE ANOTHER, THE
15 COMMISSION SHOULD DECIDE WHO MUST EXPERIENCE ANOTHER NUMBER CHANGE IN A
16 MANNER THAT LETS EACH PROSPECTIVE GROUP OF POTENTIALLY EFFECTED CUSTOMERS
17 HAVE EQUAL OPPORTUNITY TO AVOID A NUMBER CHANGE AT THE CONCLUSION OF THIS
18 PROCEEDING.