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

May 14, 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 GTE Florida Incorporated's Supplemental Posthearing Statement 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.

Sincerely,

Kimberly Caswell
Kimberly Caswell

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Enclosures

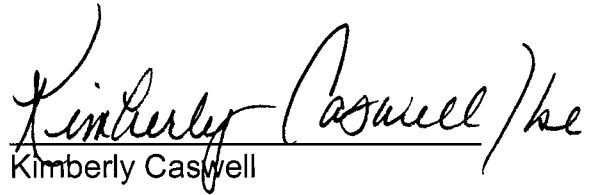
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A part of GTE Corporation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Supplemental Posthearing Statement in Docket No. 990223-TL were sent via U.S. mail on May 14, 1999 to the parties on the attached list.


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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into telephone exchange boundary issues in South Polk County <u>(Ft. Meade Area)</u>)	Docket No. 981941-TL
)	
In re: Investigation into Boundary Issues in South Sarasota and North Charlotte <u>Counties (Englewood Area)</u>)	Docket No. 990184-TL
)	
In re: Request for Review of Proposed Numbering Plan Relief for the <u>941 Area Code</u>)	Docket No. 990223-TL Filed: May 14, 1999

**SUPPLEMENTAL POSTHEARING STATEMENT OF
GTE FLORIDA INCORPORATED**

GTE Florida Incorporated (GTEFL) hereby files this supplement to its posthearing statement. GTEFL recognizes that this is an extraordinary filing, but believes it is justified for a number of reasons. The area code split alternative Staff recommends in this case (Alternative 7, as described in the Recommendation) was not presented before or at the hearing, and so the parties had no opportunity to address it. Furthermore, there are unexplained discrepancies between the relevant number exhaust periods presented by Staff at the hearing and those that appear in the Recommendation. Finally, the Recommendation overlooks important technical issues, such as LERG publication requirements.

As Sprint points out in its own Supplemental Posthearing Statement, Commissioner Johnson assured the parties that an appropriate procedural vehicle would be made available for parties to address proposals that were not fully explicated on the record. (Supplemental Posthearing Statement of Sprint-Florida Incorporated, May 11, 1999, at 1-2, quoting Comm'r Johnson at Tr. 50-51.) GTEFL believes Commissioner Johnson intended

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this forum to be made available before the Commission renders its decision. (Tr. 51.) Reconsideration is not a viable option in this case. The 941 area code is in extreme jeopardy, so there is no time for the Commission to consider post-decision filings. Thus, GTEFL asks the Commission to consider the points here before it makes a decision in this case.

There Was No Opportunity to Address Alternative 7.

As Sprint points out, “the proposed Alternative #7 was not discussed in any level of detail during the testimony filing stage or the hearing, nor was it explicitly discussed during the hearing. No party advocated Alternative #7 in post hearing filings.” (Sprint Supp. Posthearing Statement at 1.) In fact, GTEFL would take the position that Alternative 7, as recommended by Staff, was not presented or discussed at all at any stage of this proceeding. Alternative 7, as reflected in the Recommendation, was not included in the handout distributed to the public witnesses and the parties during the hearing. There was an Alternative 7 outlined in a document Staff faxed to Charlotte County before the hearing. The Charlotte County attorney, in turn, faxed that document to GTEFL before the hearing. But the Alternative 7 in that document is not the same as the Alternative 7 reflected in the Recommendation. While the county split in both cases is the same, the counties that would retain 941 are different. That is, under the first version, 941 remained with Manatee, Sarasota, Charlotte, Hardee, and DeSoto Counties. In the second version, these counties would get the new area code.

In addition, there appears to be a discrepancy between the exhaust periods Staff calculated for version 1 of Alternative 7 and some of the data in the Recommendation.

Version 1 of Alternative 7 reflected exhaust periods of 6 and 5.6 years for the counties at issue, while version 2 of Alternative 7 shows exhaust periods of 7.4 and 4.2.

GTEFL does not necessarily contend that Alternative 7, as recommended by Staff, is not the most appropriate relief option. GTEFL's only point is that it is impossible to tell because no one had an opportunity to comment or otherwise provide evidence on it. Customers are typically very proprietary about their area codes. The witnesses testifying may have had a very different view of Alternative 7 if they knew the counties would be reversed in terms of which would get the new code and which would retain 941. Furthermore, it is not clear from the Recommendation why Alternative 7 (version 2) is superior to other alternatives in terms of the NANPA guidelines or the factors considered by the Staff. For instance, the estimated exhaust periods reflected in the Recommendation for Alternatives 7 and 3 are virtually the same (for Alternative 3, 4.1 years for Area A and 7.3 years for Area B; for Alternative 7, 7.4 years for Area A and 4.2 years for Area B), so length of area code relief could not have been the decisive factor in choosing Alternative 7. In addition, from the perspective of customer impact, it seems that allowing Sarasota, Manatee, Charlotte, and Polk Counties to keep 941 (as under the Alternative 3) would affect less customers than giving Sarasota, Manatee, and Charlotte Counties a new code, as under the new Alternative 7. Again, it is impossible to tell. There is no record evidence on this point because Alternative 7, version 2, was never presented for comment. We don't know how many NXX codes are assigned in the relevant areas or how many working lines there are, for example. It seems consideration of these data would be necessary before determining customer impact.

GTEFL believes there is inadequate evidence to support Alternative 7, as proposed by Staff. If the Commission believes it is worthwhile to consider this option, GTEFL suggests that parties be given a short period during which to provide comment. If that is infeasible, perhaps Staff should reconsider its Recommendation and re-evaluate the options that were presented at the hearing. For instance, Alternative 3 and Alternative 7, version 1, would still keep Manatee, Sarasota, and Charlotte Counties together, which is a primary objective of the relief option.

The Early Permissive Dialing Date is Impossible to Comply With.

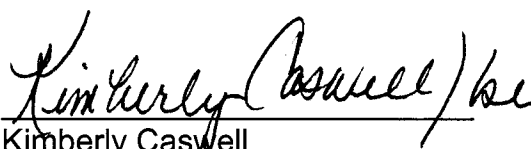
Sprint pointed out in its Supplemental Posthearing Statement that the July 5, 1999 permissive dialing date is impossible to comply with. As witnesses Foley and Scobie testified, no dialing with the new code can begin until notification of the new code has been published in two consecutive editions of the Local Exchange Routing Guide (LERG). (Sprint Supp. Posthearing Statement at 3, citing Foley, Tr. 199, Scobie, Tr. 259-60.) This requirement appears to have been ignored in the Recommendation.

GTEFL concurs in Sprint's arguments about the early permissive dialing period. Even under the best circumstances, and expediting the process as much as possible, permissive dialing cannot begin until, at the earliest, mid-September. GTEFL therefore joins with Sprint in urging the Commission to establish a start date on a Monday in September (either the 18th or 25th). If the date is not moved out in this manner, GTEFL fears that network problems (e.g., blocked or uncompleted calls from distant areas) are inevitable, because of the inadequate LERG notification.

The July date for permissive dialing will, in addition, create serious E911 issues for GTEFL. GTEFL is about to begin conversion of its E911 ALI database to make it Y2K compliant. This conversion will take until the end of July. The area code conversion that will begin with permissive dialing cannot take place at the same time as the Y2K conversion. Furthermore, the new Alternative 7 presents the situation of having to add a new area code to GTEFL's area (the original Alternative 7 did not). The switch and E911 database that serve the relevant area today are not designed to serve this fifth code in GTEFL's area (813, 941, 727, 352, new code). Software must be developed by the E911 switch vendor to allow calls from the new area code to be received and sent to the proper E911 location. At the soonest, GTEFL estimates that this could be done by mid-September. So from the perspective of the E911 difficulties, the July permissive dialing start date is impossible.

For all these reasons, GTEFL asks the Commission to ensure that there is adequate evidentiary justification for the new Alternative 7 before considering its approval. In addition, GTEFL asks the Commission to move the permissive dialing start date to September, as Sprint has also requested.

Respectfully submitted on May 14, 1999.

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