ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of a statewide emergency area code relief plan	))	DOCKET NO. 990373-TP

DIRECT TESTIMONY

OF

JOHN C. ROLLINS

ON BEHALF OF

GTE FLORIDA INCORPORATED

JUNE 9, 1999

GTE FLORIDA INCORPORATED

DIRECT TESTIMONY OF JOHN C. ROLLINS

DOCKET NO. 990373-TP

Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A. My name is John C. Rollins. My business address is GTE Network Services, 545 East John Carpenter Freeway, Irving, Texas 75062.

Q. WHAT IS YOUR POSITION WITH GTE?

A. I am a Senior Planning Manager for GTE Network Services in the Network Planning Department. I am responsible for representing GTE in numerous national forums in areas concerning local number portability and number conservation. The Network Planning function is centralized in Irving, Texas for all of the GTE Telephone Operating Companies, including GTE Florida Incorporated (GTEFL), which is one of the companies within my area of responsibility.

Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I am a graduate of Texas Tech University, with a Bachelor of Science Degree in Electrical Engineering, and have a Master of Science Degree in Telecommunications Management from the University of Southern Mississippi. I am a licensed professional engineer in the State of Texas.

I have held various positions during my 23 years of service with GTE. My experience includes positions in Plant Training, Engineering, Capital Recovery, Regulatory, and Network Planning. Over the past few years, I have participated in several national industry numbering forums dealing with number exhaust, and number conservation methods (major actions in North Carolina, Pennsylvania, Texas, Missouri, Minnesota, and California with assistance provided in Florida, Washington and Oregon). I have also represented GTE on Local Number Portability (LNP) requirement's teams in the Southwest, Western, West Coast, and Southeast Regions. I am the vice chair of the United States Telephone Association's Network Planning Subcommittee, past Co-Chair of the Southwest Region LNP Requirements Subcommittee, and the past Chairman of the Bellcore Advanced Voice Services User Group. I am also GTE's representative to the North American Numbering Council (NANC) Central Office Code Transition Team. This team has developed guidelines for the transition of the code administration from GTE and the regional bell operating companies (RBOCs) to Lockheed/Martin. I currently represent GTE on the ATIS T1S1.6 Standards Committee. This committee is responsible for developing generic requirements for Local Number Portability and Thousand Block Number Pooling.

Q. HAVE YOU EVER TESTIFIED BEFORE ANY PUBLIC UTILITIES COMMISSIONS?

A. Yes, I have appeared as an expert witness for GTE telephone companies before state utility commissions in Texas, New Mexico, Oklahoma, Arkansas, North Carolina, Missouri and Pennsylvania. My most recent involvement has been in the area of local number portability, and number conservation.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will address the issue identified for resolution in this docket: Should code holders be required to distribute telephone number consecutively, beginning with the lowest assignable telephone number. In doing so, I will review the methods used today for number assignment, briefly describe why vacant thousands blocks of numbers need to be preserved, and recommend a guideline for NXX code holders to use (referred to in the industry as "sequential number assignment") to increase the availability of vacant thousands blocks.

Q. WHAT DO YOU BELIEVE IS THE COMMISSION'S OBJECTIVE IN THIS PROCEEDING?

A. I believe the Commission's purpose in undertaking this proceeding is to ensure that the necessary measures are in place to allow number pooling later, when it becomes feasible. While the Commission, in its April 2, 1999, Order, framed this issue in terms of sequential numbering, I don't believe the Commission is averse to considering other measures that will attain its objective of preserving numbers in a way that will facilitate number pooling.

Q. DO YOU BELIEVE THIS COMMISSION HAS BROAD AUTHORITY TO ORDER NUMBER CONSERVATION MEASURES?

A. No. I understand that the FCC has jurisdiction over number conservation measures, and that it has delegated only very limited authority to the states in this regard. I am not a lawyer, and the jurisdictional issues associated with this proceeding will be discussed more fully in GTE's posthearing statement. I understand from GTE's lawyers that these issues are very serious and that the Commission's actions in this docket are narrowly constrained.

Q. HOW ARE NUMBERS ASSIGNED AND UTILIZED IN THE NETWORK TODAY?

A. Today, each company operating within a geographic area described by the rate center boundary is required to obtain a block of 10,000 numbers to insure they are able to serve new and existing customers. This block is defined by the area code (Numbering Plan Area (NPA)) and the Central Office Code. The Central Office Code is often identified as an NXX (N representing any number from 2-7 and X representing any number from 0-9). Each carrier is assigned an NPA/NXX giving them ten thousand numbers for assignment. That is, the area code + the central office code + station numbers 0000 through 9999.

Q. WHY ARE NUMBERS ISSUED IN BLOCKS OF 10,000 TODAY? CAN NUMBER BLOCKS BE ASSIGNED IN SMALLER

INCREMENTS?

A. Routing and rating of calls for all carriers today is based on the area code and central office code (NPA/NXX) or the first six digits of the ten digit telephone number. While the entire network could be modified to route and rate calls in blocks of 1,000 (e.g. seven digit routing - NPA/NXX-X) it would require ten times the number of entries in routing tables and operations system databases. GTE is not aware of any telecommunications service provider that advocates seven-digit network routing due to its cost and complexity.

There appears to be a perception that there is an abundance of usable numbers and the reason there is a number resource problem is that local exchange carriers have been assigning numbers in a haphazard and inefficient manner. This is not accurate. NXX codes that have low fill factors primarily occur in rural areas. The more significant impact on number availability is consumer demand for second line, dial-up internet access, fax, wireless services and the increase in the number of service providers customers now have to choose from for a given area. In order to facilitate the 6-digit processing of calls, each service provider requires an NXX in each existing rate center they choose to serve. The industry has attempted to make the most efficient use of the numbering resource while at the same time keeping the cost of service affordable.

Q. IF CALLS CAN NOT BE EFFICIENTLY ROUTED ON A SEVEN DIGIT BASIS, HOW IS THOUSAND BLOCK NUMBER POOLING POSSIBLE?

A. Thousand Block Number pooling now being reviewed by the FCC and the industry utilizes recently deployed Local Number Portability as a starting point. This approach maintains the six digit routing by using LNP to allow numbers to be shared between providers. Number pooling will allow NXXs to be shared by different service providers by assigning numbers in blocks of less than 10,000 to individual carriers.

Q. WHAT IS THE LINK BETWEEN THOUSAND-BLOCK NUMBER POOLING AND SEQUENTIAL NUMBER ASSIGNMENT?

A. Under appropriate circumstances where thousand block number pooling is implemented, it is beneficial to have thousand blocks without assigned numbers or with a small percentage of assigned numbers, available to be shared between service providers. If numbers have been randomly assigned across a block of 10,000 numbers the operational difficulties increase, as does the possibility of adverse impact to customers who have working numbers in the thousand block before it's transferred to another carrier. The operational issues deal with modifications to systems to insure that working numbers are ported back into the switch giving up blocks. This must be done prior to making the block available to the new carrier. Companies must insure that numbers being aged or in transition (some stage of porting in or out) are accounted for prior to

release of the block. If this is not done correctly or if the new service provider utilizing the block of numbers does not correctly identify the working numbers as not available for porting, two different customers may be assigned the same ten digit number.

Q. PLEASE DEFINE THE TERM "SEQUENTIAL NUMBER ASSIGNMENT" AS IT IS USED THROUGHOUT THE INDUSTRY.

A. The term "sequential number assignment" is really a misnomer. It does not mean that the first customer to request a number would be assigned, for example, 813-483-0001 and the second customer would be assigned 813-483-0002. If implemented in this manner, it would inconvenience customers and provide no measurable benefit from a code conservation perspective. In addition, this approach would make it difficult for companies to accommodate business customers requiring a block of numbers for future growth. The term "sequential number assignment" has been used throughout the industry to encourage assignment of numbers from open thousands blocks prior to opening new blocks. It is intended to insure that the maximum possible number of uncontaminated (blocks with no assigned customers) or slightly contaminated (blocks with less than 10% assigned numbers) 1000 number blocks are available if 1000 block pooling is utilized in a particular NPA. Guidelines on number assignment should encourage companies to assign numbers out of open 1000s blocks before going to a new thousands block while at the same time satisfying customer technical and business

requirements. Although the current development of industry standard on thousand block number pooling allow for thousand blocks containing a limited number of working customer lines to be submitted to the pool (less than 10%), the porting of completely vacant blocks is more desirable from an operations perspective and should be encouraged. For example, pooling vacant thousands blocks will reduce the chance of customer service disruption brought about if two service providers attempt to assign the same number to two different customers.

Q. WHAT OTHER ISSUES SHOULD BE CONSIDERED REGARDING SEQUENTIAL NUMBER ASSIGNMENT OF TELEPHONE NUMBERS?

A. Some digits are restricted from use by certain customer equipment and services. For example, many Private Branch Exchanges (PBX) and CentraNet (Centrex) services can not use numbers from the 0, 1, 8, or 9 thousands block due to the use of these numbers in accessing the operator, long distance dialing, and access to outside networks. Where these digit restrictions are not an issue, GTE attempts to assign customers number in the 0, 1, 8, or 9 thousands blocks and reserve the 2-7 thousands blocks for customers that require them.

Q. SHOULD THE SITUATION DESCRIBED ABOVE BE TAKEN INTO CONSIDERATION WHEN DRAFTING AN INDUSTRY

REQUIREMENT?

A. Yes. It would be inefficient to mandate that only one thousands block of numbers could be open in an NXX at a time. Such a requirement would result in residential numbers being assigned to numbers that would better serve certain business customers and result in a large amount of vacant unusable numbers over time. Therefore, whatever guideline the commission adopts should insure companies have the flexibility to assign numbers that recognize the business and technical needs of customers.

Q. WHAT HAS GTE DONE TO INSURE THE EFFICIENT ASSIGNMENT OF NUMBERS WITHIN ITS NETWORK?

A. GTE restricts the assignment of numbers to open thousands blocks in the switch and only opens a new block based on customer need or technical requirement. In situations where there are specific technical requirements associated with number utilization on the part of a customer, GTE attempts to assign numbers in a manner that maximizes the number of vacant thousands groups.

Q. DOES GTE HAVE SUGGESTED WORDING FOR THE COMMISSION TO CONSIDER IF IT CHOOSES TO RECOMMEND SEQUENTIAL NUMBER ASSIGNMENT?

A. Yes. First the Commission should be aware that sequential number assignment will not have an immediate effect in promoting number conservation and making numbers available to service providers. In

situations where thousand block pooling is implemented, however, it will help to ensure the availability of 1000s blocks that are suitable for pooling . This should serve to reduce the number of additional NXX codes required subsequent to the implementation of number pooling, thereby conserving numbers. Second, GTE offers the following two paragraphs that have been provided to state commissions in a number of states by state numbering committees to describe guidelines for the industry concerning sequential number assignment. GTE believes they capture the intent of this hearing and will have the desired result without causing unintended consequences.

> All NXX code holders should attempt to provide services in a manner which does not encourage the inefficient use or depletion of telephone numbers in any Florida NPA. In order to help accomplish this goal, all persons, including providers of telecommunications services who have accepted assignment of and make use of central office codes (NXX) in Florida, should preserve as many poolable blocks (uncontaminated blocks of 1,000 numbers and blocks of 1,000 numbers with less than 10% of its numbers assigned) of thousand numbers in their central office codes as possible. This should enhance the effectiveness of thousand-block pooling, as a number conservation tool, once it becomes practical and it's determined to be

beneficial to implement number pooling in Florida exchanges.

All NXX code holders are encouraged to assign numbers from thousand number blocks already in use rather than from unused thousand number blocks. In addition, every effort should be made to assign numbers out of the 0, 1, 8, and 9 thousands blocks to business and residential customers able to use them. This recommendation is not meant to prohibit service providers from meeting customer number assignment needs which cannot be accommodated by utilizing either numbers in 1,000 blocks already in use or numbers in the 0, 1, 8, or 9 thousand blocks.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. I have reviewed the number assignment process and discussed number pooling and its link to "sequential number assignment," as that term is properly understood. In keeping with the Commission's objective of preserving vacant thousands blocks in anticipation of number pooling, I have suggested wording for the Commission order that will result from this proceeding.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.