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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF WILLIAM G. SHAUGHNESSY, JR.
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 990373-TP
JUNE 9, 1999

Q. PLEASE STATE YOUR NAME AND COMPANY NAME AND ADDRESS.

A. My name is William G. Shaughnessy, Jr. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Manager in Federal Regulatory. My business address is 675 W. Peachtree Street, Atlanta, Georgia, 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I am a 1973 graduate of St. Anselm's College of Manchester, New Hampshire with a degree in mathematics. I received my Master of Science degree in 1973 from Bowling Green State University in Bowling Green, Ohio with a degree in mathematics. I taught mathematics until 1980. I began employment with South Central Bell in 1980, in the Network Department. From 1980 to 1992, I held various positions in the network department. From 1992 to 1995, I had a rotational assignment with Bell Communications Research in Piscataway, New Jersey. In 1995, I returned to BellSouth as a Manager in Federal Regulatory. I

1 represent BellSouth in various national forums and committees dealing
2 with numbering issues.

3

4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

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6 A. No.

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8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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10 A. The purpose of my testimony is to describe BellSouth's position on the
11 proposal by the Florida Public Service Commission ("Commission") to
12 order the assignment of telephone numbers consecutively within area
13 code, beginning with the lowest available telephone number.

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15 Q. DOES BELLSOUTH SUPPORT SUCH A PROPOSAL?

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17 A. No. BellSouth believes that this Commission does not have the authority
18 to order that telephone numbers be assigned in such a fashion. The
19 FCC recently issued an order *In the Matter of Petition for Declaratory*
20 *Ruling and Request for Expedited Action on the July 15, 1997 Order of*
21 *the Pennsylvania Public Utility Commission Regarding Area Codes 412,*
22 *610, 215 and 717.* In the Order, the FCC specifically declined to
23 delegate to state commissions the authority to administer or allocate
24 NXX codes. It is BellSouth's view that how numbers are assigned within
25 an NXX constitutes NXX administration. In addition, as pointed out in

1 the testimony of BellSouth Witness Marleen John, such a proposal would
2 be beyond the capabilities of BellSouth's current number assignment
3 systems.

4

5 Q. ARE YOU AWARE OF ANY INDUSTRY DISCUSSIONS ON
6 ASSIGNING TELEPHONE NUMBERS AS PROPOSED BY THE
7 FLORIDA COMMISSION?

8

9 A. No. As far as I am aware, there have been no discussions of assigning
10 telephone numbers in a consecutive manner as proposed by the Florida
11 Commission. However, there has been discussion on a sequential
12 number assignment concept that BellSouth refers to as thousand
13 number block management.

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15 Q. WHAT IS THOUSAND NUMBER BLOCK MANAGEMENT?

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17 A. Thousand number block management is defined as the process whereby
18 service providers manage numbers within an NXX at a thousand block
19 level. Service providers would attempt to assign numbers out of specific
20 one thousand blocks within an NXX, before assigning numbers out of
21 additional thousand blocks within the NXX. Thus, thousand number
22 block management attempts to achieve high utilization for each thousand
23 block within the NXX before making assignments out of a subsequent
24 thousand block.

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1 Q. ARE CARRIERS REQUIRED TO MANAGE THEIR RESOURCES
2 USING THOUSAND NUMBER BLOCK MANAGEMENT?

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4 A. No. Carriers are permitted to assign numbers throughout the NXX code
5 in any random sequence as demand dictates. The current central office
6 code assignment guidelines do not address number assignment within
7 thousands blocks.

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9 Q. WHAT ARE THE BENEFITS OF THOUSAND NUMBER BLOCK
10 MANAGEMENT?

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12 A. Thousand number block management can play a key role in maximizing
13 the availability of non-contaminated thousand blocks by requiring service
14 providers to manage the available numbers in each thousand block
15 before making numbers available in additional thousand blocks. A non-
16 contaminated thousand block is a thousand block from which no
17 numbers have been assigned. Thousand number block management
18 will help carriers to maximize the number of non-contaminated thousand
19 blocks within an NXX. Thus, if thousand-block pooling is implemented,
20 there should be sufficient non-contaminated thousand blocks for carriers
21 to donate to the industry pool.

22

23 Q. WHAT IS BELLSOUTH'S POSITION ON THOUSAND NUMBER BLOCK
24 MANAGEMENT?

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1 A. Though it is clear that thousand number block management falls under
2 the category of number administration, which the state commissions are
3 prohibited from addressing on a mandatory basis, BellSouth supports
4 voluntary efforts to move toward thousand number block management in
5 selected areas. If thousand number block management is implemented
6 by service providers prior to the implementation of thousand block
7 number pooling, non-contaminated blocks can be identified in
8 preparation for pooling and contamination of additional thousand blocks
9 could likely be minimized. However, even with thousand number block
10 management, each service provider must have the flexibility to respond
11 to particular customer requests regarding number assignments. A
12 voluntary stipulation describing thousand number block management
13 was signed by BellSouth and submitted in this docket.

14

15 Q. SHOULD THIS DOCKET BE CLOSED?

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17 A. Yes. On June 2, 1999, the FCC released its Notice of Proposed
18 Rulemaking (NPRM) in CC Docket 99-200 on Numbering Resource
19 Optimization. The NPRM is seeking comments on a variety of issues.
20 Comments on the NPRM are due July 30, 1999. Reply comments are
21 due August 30, 1999. One of the issues that the FCC is seeking
22 comment on is the issue of sequential number assignment. The FCC is
23 seeking comment on whether they should order some form of sequential
24 number assignment prior to the actual implementation of pooling. The
25 FCC also notes that sequential number assignment may improve carrier

1 efficiency in utilizing numbering resources, regardless of whether pooling
2 is implemented. Thus, the specific issue that is being addressed by the
3 Florida Commission in Docket 990373-TP is one of the many issues that
4 are being addressed by the FCC in Docket 99-200.

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6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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8 A. Yes, it does.

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