

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

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November 17, 1999

ORIGINAL

VIA HAND DELIVERY

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

Re: Docket No. 990517-TL

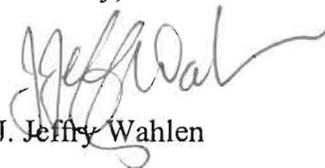
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Direct Testimony of Deborah J. Nobles.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

JJW/jh

Enclosure

cc: All Parties of Record (w/encls.)

- AFA _____
- APP _____
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1 working for ALLTEL, I had responsibility at various times
2 for overseeing regulatory matters in the states of North
3 Carolina, South Carolina, Florida, Georgia, Alabama,
4 Mississippi, Kentucky, Tennessee and Pennsylvania.

5 I began working for Northeast in January 1999 as Director
6 of Revenue Requirements and Regulatory Affairs and was
7 promoted to my current position in April 1999. My
8 current responsibilities include representing the local
9 exchange company subsidiaries of Townes
10 Telecommunications, Inc., which owns Northeast, in all
11 state and federal regulatory matters in the states of
12 Arkansas, Colorado, Florida, Kansas, Missouri and Texas.

13
14 Q. Please describe Northeast.

15
16 A. Northeast is a small incumbent local exchange company
17 with its headquarters in Macclenny, Florida. Northeast
18 serves approximately 9,000 access lines in its
19 certificated territory, which is in Baker County,
20 Florida. Northeast is a wholly owned subsidiary of
21 NEFCOM, Inc., which, in turn, is a wholly owned
22 subsidiary of Townes Communications, Inc. ("Townes").
23 Townes owns several rural telephone companies in the
24 states of Arkansas, Texas, Colorado, Florida, Kansas, and
25 Missouri. Northeast elected to be regulated by the FPSC

1 under the "price regulation" form of regulation in
2 February of 1999.

3
4 Q. What is the purpose of your testimony?

5
6 A. The purpose of my testimony is to state Northeast's
7 position on the appropriate numbering plan area relief in
8 the 904 area code.

9
10 Q. Please explain the alternatives for NPA relief for the
11 904 area code that have been considered by the industry
12 participants.

13
14 A. The industry participants considered six alternatives for
15 relief of the 904 NPA. The first alternative was an all
16 services distributed overlay. The second alternative was
17 a concentrated growth overlay. The third, fourth, fifth
18 and sixth alternatives were geographic splits. After
19 careful consideration, the industry participants reached
20 consensus on an all services distributed overlay as the
21 relief plan for the 904 NPA.

22 Q. Please describe the alternative recommended by the
23 industry.

1 A. The industry recommends Alternative 1 as set forth in the
2 petition filed by Lockheed Martin IMS in this proceeding.
3 Under Alternative 1, a new NPA would be overlaid over the
4 same geographic area covered by the existing 904 NPA.
5 All existing customers would retain their current area
6 code and telephone numbers. The plan would involve 10
7 digit dialing both within and across NPA boundaries of
8 the existing NPA and the new NPA.

9
10 Q. Why did the industry participant group select Alternative
11 1?

12
13 A. The reasons that Alternative 1 was selected as the
14 consensus recommendation of the industry participants are
15 explained in the minutes of the industry meetings, which
16 are attached as Exhibit A to Lockheed Martin IMS's
17 petition in this docket. I agree with the evaluation of
18 the options as set forth in the minutes.

19
20 Q. What number conservation measures, if any, should be
21 implemented for the 904 NPA?

22 A. The Commission should continue its separate proceeding on
23 number conservation measures. Once that proceeding has
24 been completed, it should consider applying the
25 appropriate measures on a prospective basis for the 904

1 NPA and the new NPA used as part of the relief process
2 for the 904 NPA. Applying number conservation measures
3 in the 904 NPA on a retroactive basis would cause
4 confusion and would not significantly lengthen the life
5 of the existing 904 NPA.

6
7 Q. What should be the dialing pattern for local, toll, EAS
8 and ECS calls for the 904 NPA?

9
10 A. If the industry recommendation is adopted, 10 digit
11 dialing would be required for local, EAS and ECS calls.
12 1 plus 10 digit dialing would be required for toll calls.

13
14 Q. What is the appropriate relief plan implementation
15 schedule for the 904 NPA?

16
17 A. Once the FPSC approves the recommended relief plan, NANPA
18 can assign the new NPA within 14 days. The transitional
19 dialing period, which permits customers to dial service
20 on ten digits, should begin 90 days after the NPA is
21 assigned and should continue for 180 days.

22
23 Q. Does this conclude your direct testimony?

24 A. Yes.

25

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 17th day of November, 1999, to the following:

Beth Keating *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301-1556

Gwen Azama-Edwards
City of Daytona Beach
P. O. Box 2451
Daytona Beach, FL 32115-2451

Fritz Behring
City of Deltona
P. O. Box 5550
Deltona, FL 32728-5550

Michael A. Gross
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Angela Green
General Counsel
Florida Public Telecommunications Association
125 S. Gadsden Street, #200
Tallahassee, FL 32301-1525

Carol Barice/James Fowler
Fowler, Barice Law Firm
28 W. Central Blvd.
Orlando, FL 32801

Donna C. McNulty
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Floyd Self
Messer Law Firm
P. O. Box 1876
Tallahassee, FL 32302

F.B. (Ben) Poag
Sprint-Florida, Inc.
P. O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214

Robert M. Weiss
Volusia County
123 W. Indiana Ave. Room #205
DeLand, FL 32720

Charles Rehwinkel
Sprint-Florida, Inc.
P. O. Box 2214
Tallahassee, FL 32316

Harriet Eudy
ALLTEL Florida, Inc.
P. O. Box 550
Live Oak, FL 32060

Attorney

