MCI WORLDCOM

Donna Canzano McNulty
Senior Attorney
Law and Public Policy

ORIGINAL

November 17, 1999

VIA HAND DELIVERY

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

Re: Docket No. 990455-TL - Request for Review of the Proposed Numbering Relief Plan for the 305/786 Area Code - Dade County and Monroe County/Keys Region
Docket No. 990456-TL - Request for Review of the Proposed numbering Plan Relief for the 561 Area Code
Docket No. 990457-TL - Request for Review of the Proposed Numbering Relief Plan for the 954 Area Code

Dear Ms. Bayo,

Enclosed for filing in the above-referenced docket are the original and fifteen copies of the Prefiled Direct Testimony of Greg Darnell and Kelly Faul on behalf of MCI WorldCom, Inc., and Its Operating Subsidiaries.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance in this matter. If you have any questions regarding this filing, please contact me at your convenience.

AFA
APP
CAF
CMU
CTR
EAG
LEG 1
MAS 3+4+5
OPC
PAI
SEC 1
WAW
OTH

Sincerely,

Donna Canzano McNulty

Donna Canzano McNulty

Enclosures
cc: Parties of Record

325 John Knox Road, Suite 105
Tallahassee, FL 32303
850 422 1254
Fax 850 422 2586

Darnell
DOCUMENT NUMBER-DATE
14101 NOV 17 99
FPSC-RECORDS/REPORTING

Faul
DOCUMENT NUMBER-DATE
14102 NOV 17 99
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 17th day of November, 1999.

AT&T Communications of the Southern States, Inc.
Tracy Hatch/Marsha Rule
101 North Monroe Street Suite 700
Tallahassee, FL 32301

BellSouth Mobility, Inc.
Gloria Johnson
1100 Peachtree St. NE
Suite 910
Atlanta, GA 30309-4599

BellSouth Telecommunications, Inc.
Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Florida Cable Telecommunications Assoc., Inc.
Michael A. Gross
310 N. Monroe Street
Tallahassee, Fl 32301

Florida Public Telecommunications Assoc.
Angela Green, General Counsel
125 S. Gadsden St., # 200
Tallahassee, Fl 32301-1525

GTE Florida Incorporated
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Holland Law Firm
Bruce May
P.O. Box 810
Tallahassee, FL 32302-0810

Lockeed Martin IMS
D. Wayne Milby
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005

Lockheed Martin IMS/NANPA
Thomas Foley
820 Riverbend Blvd.
Longwood, FL 32779

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

MCI WorldCom, Inc.
Brian Sulmonetti
Six Consourse Parkway, Suite 3200
Atlanta, GA 30328

Messer Law Firm
Floyd Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301-1876

Morrison & Foerster Law Firm
Kimberly D. Wheeler
2000 Pennsylvania Ave. NW
Washington, DC 2006-1888

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302

Sprint PCS
Joe Assenzo
Legal Department
4900 Main Street, 11th Floor
Kansas, City, MO 64112

Sprint-Florida, Incorporated
Charles J. Rehwinkel/Susan Masterton
P.O. Box 2214
Tallahassee, FL 32316-2214

Florida Public Service Commission
Catherine Bedell/Legal Dept.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Florida Public Service Commission
Diana Caldwell/Legal Dept.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Florida Public Service Commission
Donna Clemons/Legal Dept.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Florida Public Service Commission
C. Lee Fordham/Legal Dept.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Office of Public Counsel
Charles Beck
111 W. Madison Street
812 Claude Pepper Bldg
Tallahassee, FL 32399-1400

ALLTEL Florida, Inc.
Ms. Harriet Eudy
P.O. Box 550
Live Oak, FL 32060-3357

Ausley Law Firm
Jeffrey Wahlen
P.O. Box 391
Tallahassee, Fl 32302

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

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

Northeast Florida Telephone Company, Inc.
Deborah L. Nobles
P.O. Box 485
Macclenny, FL 32063-0485

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, Fl 32301

Time Warner Communicatrions
Carolyn Marek, VP, Regulatory Affairs
Southeast Region
233 Bramerton Court
Franklin, TN 37069

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

Florida Public Service Commission
Beth Keating/ Legal Dept.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Attorney

132454.1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of The Proposed Numbering Relief Plan for the 305/786 Area Code Dade County and Monroe County/ Keys Region	)	DOCKET NO. 990455-TL
In re: Request for Review of The Proposed Numbering Plan Relief For the 561 Area Code	)	DOCKET NO. 990456-TL
In re: Request for the Review of The Proposed Numbering Relief Plan For the 954 Area Code	)	DOCKET NO. 990457-TL
	)	FILED:NOVEMBER 17,1999

ORIGINAL

DIRECT TESTIMONY

OF

GREGORY J. DARNELL

ON BEHALF OF

MCI WORLDCOM, INC.

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Greg Darnell, and my business address is 6 Concourse Parkway, Suite 3200, Atlanta, Georgia, 30328.

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

A. I am employed by MCI WorldCom, Inc. as Regional Senior Manager -- Public Policy.

Q. HAVE YOU PREVIOUSLY TESTIFIED?

A. Yes, I have testified in proceedings before regulatory commissions in Alabama, California, Florida, Georgia, Kentucky, Louisiana, North Carolina, South Carolina and Tennessee and on numerous occasions have filed comments before the FCC. Provided as Exhibit GJD-1 to this testimony is a summary of my academic and professional qualifications.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of this testimony is to provide MCI WorldCom's position on how the Florida Public Service Commission ("FPSC") should utilize its interim authority on number conservation measures delegated to them by the Federal Communications Commission ("FCC").[1]

---

[1] In the Matter of Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, FCC 99-249, released September 15, 1999 ("Florida Number Conservation Order").

Q. WHAT AUTHORITY DID THE FCC DELEGATE TO THE FLORIDA PSC?

A. The FCC conditionally granted the Florida PSC the authority to institute thousand-block pooling trials; reclaim unused and reserved NXX codes, and portions of those codes; maintain rationing procedures for six months following area code relief; set numbering allocation standards; require the submission of utilization data from all carriers; and implement NXX code sharing.

Q. WHAT HAPPENS TO FLORIDA PSC's AUTHORITY AFTER THE FCC ISSUES ITS NUMBERING RULES?

A. Assuming any actions taken by the Florida PSC under its delegated authority are consistent with the rules that will be established by the FCC in its Numbering Resource Optimization proceeding,[2] nothing should happen. However, if actions taken by the Florida PSC turn out to be inconsistent with the rules that will be established by the FCC, such actions will be superseded.

Q. WHAT ARE MCI WORLDCOM'S RECOMMENDATIONS?

A. MCI WorldCom believes the FPSC's goal in this matter should be to do what it can to preserve the shared resource of the North American Numbering Plan (NANP) and ensure competitively neutral, efficient number management. Any action proposed must be evaluated by how

[2] See Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 99-122 (rel. June 2, 1999).

it works to realize this goal.

Q. SHOULD THE FPSC RUN TWO PARALLEL PROCEEDINGS BOTH ATTEMPTING TO ADDRESS NUMBER CONSERVATION MEASURES?

A. No. The FPSC currently has two open proceedings that are addressing the same number conservation measures. It is the recommendation of MCI Worldcom that all number conservation measures from this docket be consolidated into Florida PSC Docket No. 981444-TP.

Q. WHAT IS THE PRIMARY CAUSE OF THE CURRENT NUMBERING CRISIS?

A. ***It is critical to recognize that premature area code exhaust occurs because of inefficiencies in the assignment and use of NXX codes and is not caused by inefficiencies in the utilization of telephone numbers.***

Q. WHAT INEFFICIENCIES ARE THERE IN THE ASSIGNMENT AND USE OF NXX CODES?

A. Instead of assigning telephone numbers to carriers as end users demand new telephone numbers, the telephone industry has an arcane system of requiring service providers to obtain numbers in blocks of full NXX codes, or 10,000 numbers, in order to provide any service to areas defined by "rate centers". Then once the NXX codes are obtained, assignment of actual telephone numbers must wait on end user demand. This NXX code per rate center requirement creates something

referred to as "footprint" demand because it establishes the geographic area where the service provider can sell its services.

Q. HOW IS FOOTPRINT DEMAND DIFFERENT THAN END USER DEMAND?

A. Footprint demand is the amount of numbers a telecommunications service provider needs to provide any service to a specific area. That is if a telecommunications service provider wants to provide any service in a rate center, it needs a minimum of 10,000 numbers. If a local exchange company wants to provide service in four rate centers, it needs a minimum of 40,000 numbers, and so on. End user demand is simply the number of telephone numbers demanded by end users.

Q. WHY ARE FULL NXX CODES, OR 10,000 NUMBERS, CURRENTLY REQUIRED TO PROVIDE ANY SERVICE IN EACH RATE CENTER?

A. In today's public switched telephone network, each ten-digit telephone number serves as a unique network address. At the same time, the first six digits of each number, also known as the NPA-NXX, are used for rating and routing of call to or, in some cases, from that network address.[3] The Local Exchange Routing Guide, or LERG, serves as the central repository of rating and routing information for each NPA-NXX. When a service provider obtains an NPA-NXX (i.e. a block of 10,000

[3] Location Routing Number (LRN) technology, the technology that enables Local Number Portability (LNP), makes it possible to override the default routing which would otherwise occur based on the NPA-NXX.

numbers) from the Central Office Code administrator, it must activate that code in the LERG. In doing so, the service provider must associate that NPA-NXX with a particular geographic rate area. In turn, all service providers, including local exchange carriers, interexchange carriers and wireless carriers must periodically receive updated LERG information to ensure the proper rating and routing of calls. Therefore, full NXX codes are currently required because of the need to have calls delivered to the correct location and billed correctly.

Q. WHAT IMPACT DOES THE NXX CODE PER RATE CENTER REQUIREMENT, OR FOOTPRINT DEMAND, HAVE ON NUMBER EXHAUST?

A. Because LECs require a full NPA-NXX (i.e. 10,000 numbers) in each rate center just to begin offering service, the footprint demand created by the advent of local competition has caused the current numbering crisis. For example, each Alternative Local Exchange Company (ALEC) that plans to serve customers in Pompano Beach, Coral Springs, Deerfield Beach and Boca Raton will need 40,000 numbers to establish its footprint as all these areas are in separate BellSouth rate centers. If 10 ALECs want to provide service to this area, they would require a minimum of 400,000 numbers. This is true even though BellSouth is currently providing service to the customers of this area with its own blocks of NXX codes, the CLECs may not have any customers yet and all of these cities are within a single 10-mile radius.

Q. WHAT ARE RATE CENTERS?

A. Rate centers are geographic locations used for the purpose of establishing the distance between two points. Rate Centers are typically specially identified ILEC central offices or tandems. Each rate center is given a unique vertical and horizontal ("V&H") coordinate. These V&H coordinates can be put through a mathematical calculation to determine the distance between the two rate centers. This distance is then used to determine the rate that should be applied to certain types of calls.

Q. HOW CAN THE FLORIDA PSC UTILIZE THE CONDITIONAL AUTHORITY GRANTED TO IT BY THE FCC TO ADDRESS EXCESSIVE FOOTPRINT DEMAND?

A. There are two fundamental ways to address excessive footprint demand. First, the number of rate centers can be reduced. This is referred to as Rate Center Consolidation. Second, work can be done to reduce the numbers required in each rate center. This is being addressed by 1,000 block number pooling. Any "solution" to the problem of premature area code exhaust that purports to improve a carrier's or industry segment's low telephone number utilization without addressing the inefficiencies in the assignment and use of NXX codes is destined to fail.

Q. HOW DOES RATE CENTER CONSOLIDATION WORK TO ENSURE

COMPETITIVELY NEUTRAL, EFFICIENT NUMBER MANAGEMENT?

A. At a high level this is simple. The fewer the number of rate centers there are in a given area, the less number of 10,000 blocks each service provider needs to establish its footprint. However, implementation can be much more complicated because consolidating rate centers may have an impact on local calling areas, toll billing, E911 call routing and intercarrier compensation mechanisms. Customer notification and LERG updates are also issues that must be addressed. As rate center consolidation is relevant only to carriers that have multiple rate centers, this is primarily an ILEC issue. As such, I believe the ILECs, working with the work group established by this Commission in Docket No. 981444-TP, will provide a comprehensive proposal on rate center consolidation.

Q. **HOW DOES 1,000 BLOCK NUMBER POOLING IMPROVE NUMBER MANAGEMENT?**

A. With 1,000 block number pooling, instead of requiring a minimum of 10,000 numbers for each rate center, service providers only require a minimum of 1,000 numbers for each rate center. So, the initial efficiency gains are enormous. In the Pompano Beach, Coral Springs, Deerfield Beach and Boca Raton rate center example described above, the 10 ALECs would require 40,000 numbers instead of 400,000 numbers to establish their service area footprints and begin offering service.

Q. HOW DOES 1,000 BLOCK NUMBER POOLING WORK?

A Thousands block number pooling requires Local Number Portability (LNP) technology to be in place, which allows numbers to be moved between switches. A pooling administrator is selected and that pooling administrator works with all participants to determine a timeline for implementation. The timeline consists of the following steps: 1) each service provider must forecast the 1,000 block it will request in the next 18 months; 2) a block protection date is established by which service providers are required to protect 1,000 blocks of numbers from contamination (i.e. keep them unused so that they can be returned in tact); 3) a block donation date is established; 4) an assessment is made by the Pool Administrator regarding the size and potential lifespan of the planned number pool; and 5) blocks of 1000 numbers are donated on the specified date. Service providers may then start requesting from the pool administrator blocks of 1,000 numbers instead of 10,000 numbers to meet their numbering needs. The pool administrator will then assign 1,000 blocks to the service providers and the numbers are then ported to them for their use.

Q. WHAT IS CURRENTLY BEING DONE TO IMPLEMENT 1,000 BLOCK NUMBER POOLING?

A. On October 29, 1999 the Southeast Limited Liability Corporation approved Number Portability Administration Center (NPAC) version 3.0 software that will be used by all LNP capable carriers to

implement 1,000 block numbering pooling by the end of next year. It is anticipated that Lockheed Martin will complete the software coding of release 3.0 by June 30, 2000. Once coding is completed, industry testing will begin. It is estimated that it will take the industry 4 to 6 months to complete testing. Industry groups are currently working to finalize a test plan. MCI WorldCom is working hard to make sure all of its internal systems affected by 1,000 block number pooling will be ready for number pooling deployment. MCI WorldCom plans to be ready to begin testing 1,000 block number using NPAC Version 3.0 software when testing begins in July of 2000.

Q. HOW DOES NPAC VERSION 3.0 SOFTWARE MAKE 1,000 BLOCK POOLING POSSIBLE IN MULTIPLE AREA CODES?

A. NPAC software version 3.0 was developed to implement the lessons learned from a 1,000 block pooling trial that was conducted in the Chicago, Illinois area. NPAC 3.0 software utilizes efficient data representation ("EDR") which enables service providers to handle pooled 1,000 blocks as one record. By treating 1,000 blocks as one record, EDR minimizes potential network reliability problems and implementation costs.

Q. WHAT CAN THE FLORIDA PSC DO TO ENSURE 1,000 BLOCK NUMBER POOLING IS IMPLEMENTED AS SOON AS POSSIBLE?

A. The Florida PSC should oversee the NPAC version 3.0 software

deployment schedules of LNP capable carriers to ensure everything is being done to implement 1,000 block number pooling as quickly as possible without imposing any undue risk on network reliability.

Q. DOES 1,000 BLOCK NUMBER POOLING IMPOSE A RISK ON NETWORK RELIABILITY?

A. Yes. As I explained before, currently, call routing and billing is done based on each carrier having a full NXX code in each rate center. 1,000 block number pooling changes this association. Anytime a change is imposed on the complex telecommunications network, there is a potential impact on network reliability. The industry has developed NPAC version 3.0 software to help manage this risk.

Q. HOW SHOULD 1,000 BLOCK POOLING COSTS BE RECOVERED?

A. Section 251(e)(2) of the Telecommunication Act[4] and paragraph 17 of the FCC's Florida Number Conservation Order, requires costs to be recovered on a competitively neutral manner. 1,000 block number pooling is based on Local Number Portability (LNP) architecture. It is therefore logical that the cost categories of 1,000 block pooling to be similar to those used for LNP. The FCC has identified three categories of costs for 1,000 block pooling administration: 1) costs incurred by the industry as a whole, such as NANP administrator costs, OSS

[4] 47 U.S.C. § 251(e)(2).

enhancements and operations support[5] to the existing NPAC; 2) carrier-specific costs directly related to 1,000 block pooling implementation, such as enhancements to carriers' SCP and OSS systems; and 3) carrier specific costs not directly related to 1,000 block pooling implementation. Category 1 costs should be allocated among all telecommunications carriers and recovered based on gross revenues net of payments to other telecommunications service providers. Category 2 costs should be recovered in the lawful manner prescribed by this Commission. In LNP, ILECs recovered carrier-specific LNP directly incurred costs via end user surcharges. Category 3 costs are not subject to the section 251(e)(2) requirement of being borne by all carriers. As such, no special provisions are necessary for carriers to recover these costs.

Q. HOW SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY TO RECLAIM UNUSED AND RESERVIED NXX CODES AND PORTION OF THOSE CODES?

A. The industry has established strict guidelines for NXX code reclamation and NXX code reservation. The Commission should ensure Lockheed Martin in its current role of Numbering Administrator is effectively implementing these guidelines.

Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY TO

[5] Costs to interact with the pool administrator and to process/broadcast data blocks.

MAINTAIN RATIONING PROCEDURES FOR SIX MONTHS FOLLOWING AREA CODE RELIEF?

A. No. Maintaining rationing procedures after area code relief has been implemented is not beneficial. Some believe that by continuing rationing procedures for six months after area code relief is implemented, the life of the new area code can be extended. However, maintaining rationing procedures after area code relief is implemented creates pent up demand for telephone numbers that will be realized. As such, the longer rationing procedures are in place the greater this pent up demand will become. Further, rationing procedures inhibit the development of local competition as new entrants may be unable to obtain numbers they need for market entry. As such, rationing procedures should not be used if at all possible.

Q. SHOULD THE FLORIDA PSC SET NUMBERING ALLOCATION STANDARDS?

A. The current industry "months-to-exhausts" process administered by Lockheed Martin effectively manages the utilization of telephone numbers. No modification to these standards is necessary. The Florida PSC must once again keep in mind the current numbering crisis is caused by ***inefficiencies in the assignment and use of NXX codes and is not caused by inefficiencies in the utilization of telephone numbers.*** Modification of the current number allocation standards would be an attempt to address a perceived inefficiency in the

utilization of telephone numbers. However, there is no information that shows this perceived inefficiency is real and further, there is no information that shows growth code requests are a substantial factor in NPA exhaust. Modification of the current number allocation standards would fail to address the problem, i.e. the inefficiency in the assignment and use of NXX codes. As such, since the current numbering allocation standards are not broken, there is no reason to fix them.

Q. SHOULD THE COMMISSION IMPOSE FILL RATE REQUIREMENTS IN PLACE OF THE CURRENT PRACTICE ON "MONTHS TO EXHAUST" FOR GROWTH CODES?

A. No. Establishment of a fixed percentage for fill rates is arbitrary. Utilization cannot be considered in a vacuum. Eighty percent fill rate for one service provider may bear no relation to 80% fill rate of another service provider. **Any** arbitrary fill rate will fail to address the fact that numbering demand does not always come in a nice even stream of customers. At certain times, numbering demand can come in very large amounts. At other times, a service provider's numbering demand may actually be declining. Utilization must be placed in the appropriate context by examining anticipated change in numbering demand. As such, the forecasted month-to-exhaust process currently in place is the best way to effectively manage number utilization.

Q. IS ANYTHING BEING DONE TO IMPROVE NUMBER UTILIZATION?

A. Yes. MCI WorldCom does support the NRO recommendation for federal guidelines to modify the number allocation process to add the establishment of fees for numbers that are held in reserve status for more than one year. Unless there are economic consequences for doing so, carrier may elect to maintain unnecessarily large number inventories in reserve status. In most cases, one year is a sufficiently long period of time to reserve a number. It is appropriate that reservations longer than one year carry some financial cost.

Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY TO REQUIRE THE SUBMISSION OF UTILIZATION DATA FROM ALL CARRIERS?

A. Utilization data is already required as part of the industry guidelines. The Florida PSC should obtain data collected by Lockheed Martin, ensure industry guidelines are being followed and evaluate whether any changes are needed to the utilization data requirements.

Q. WHAT CONSIDERATIONS SHOULD BE GIVEN TO DATA COLLECTION?

A. I understand the Florida PSC is participating in state coordination group (SCG) conference calls for the purpose of sharing experience and knowledge among state regulators on numbering issues. Coordination of this type is of great importance. Data reporting requirements could benefit from this type of coordination among the

states. There is a national need for ubiquity of data reporting. Consistent data reporting between states will enable regulators to conduct meaningful cross sectional analysis. Cross sectional analysis of data should enable regulators to better understand the causes of number demand and, as a result, better forecast number exhaust. The SCG should work with the industry and the FCC in an attempt to develop a single unified national reporting requirement and reporting structure.

Q. DOES MCI WORLDCOM BELIEVE ANY CHANGES ARE NEEDED TO THE FLORIDA'S CURRENT UTILIZATION DATA REQUIREMENTS?

A. No. However, modifications are currently being proposed to the national Central Office Code Utilization Study (COCUS) reporting requirements that if adopted should meet all of the numbering data needs of the Florida PSC. The Florida PSC should comport any state specific reporting requirements to any national rules that are established.

Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY AND IMPLEMENT NXX CODE SHARING?

A. Currently, no industry guidelines exist for NXX code sharing. As such, there is nothing that can be implemented. The FPSC should continue to work with the industry through the work groups it has established in Docket No. 981444-TP to define code sharing and

determine whether it is a feasible method to conserve numbering resources. If the Commission's NXX code sharing work group determines code sharing is feasible it should submit a proposal so that industry guidelines can be considered.

Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT TESTIMONY?

A. Yes.

Exhibit GJD-1

GREGORY J. DARNELL
PROFESSIONAL EXPERIENCE

6/21/96 - Date *REGIONAL SENIOR MANAGER, MCI WORLDCOM, PUBLIC POLICY.*

Responsibilities: Define MCI's public policy and ensure effective advocacy throughout BellSouth Region.

9/1/95 - 6/21/96 *SENIOR STAFF SPECIALIST III, MCI, NATIONAL ACCESS POLICY.*

Responsibilities: Define MCI's national access policies and educate field personnel. Present MCI's access policy positions to Executive Management and obtain concordance.

9/1/94 - 9/1/95 *SENIOR STAFF SPECIALIST III, MCI, CARRIER RELATIONS.*

Responsibilities: Manage MCI's business relationship with ALLTEL.

1/1/93 - 9/1/94 *SENIOR STAFF SPECIALIST II, MCI, SOUTHERN CARRIER MANAGEMENT.*

Responsibilities: Chief of Staff.

9/1/91 - 1/1/93 *MANAGER, MCI, ECONOMIC ANALYSIS.*

Responsibilities: Write tariff and rulemaking pleadings before the FCC. Testify before state utility commissions on access issues. Serve as MCI's expert on Local Exchange Carrier revenue requirements, demand forecasts and access rate structures.

1/1/90 - 9/1/91 *SENIOR STAFF SPECIALIST I, MCI, FEDERAL REGULATORY.*

Responsibilities: Direct analysis to support MCI's positions in FCC tariff and rulemaking proceedings. Provide access cost input to MCI's Business Plan. Write and file petitions against annual tariff filings and requests for rulemaking. Train State Utility Commissions on the use and design of financial databases.

GREGORY J. DARNELL

1/1/89 - 1/1/90 *STAFF SPECIALIST III, MCI, FEDERAL REGULATORY.*

Responsibilities: Track and monitor tariff transmittals for Ameritech, BellSouth, SWBT and U S West. Author petitions opposing RBOC tariff filings. Represent MCI at National Ordering and Billing Forum.

10/9/87 - 1/1/89 *SUPERVISOR, MCI, TELCO COST ANALYSIS.*

Responsibilities: Supervise team of analysts in their review of interstate access tariff changes. Coordinate updates to Special Access billing system.

1/1/86 - 10/9/87 *FINANCIAL ANALYST III, MCI, TELCO COST.*

Responsibilities: Analyze MCI's access costs and produce forecasts.

6/1/85 - 1/1/86 *STAFF ADMINISTRATOR II, MCI, LITIGATION SUPPORT.*

Responsibilities: Support MCI's antitrust counsel in taking depositions, preparing interrogatories and document requests.

1/1/84 - 6/1/85 *PRODUCTION ANALYST, MCI, LITIGATION SUPPORT.*

Responsibilities: Review and abstract MCI and AT&T documents obtained in MCI's antitrust litigation.

8/1/82 - 1/1/84 *LEGAL ASSISTANT, GARDNER, CARTON AND DOUGLAS.*

Responsibilities: Research and obtain information from the FCC, FERC and SEC.

EDUCATIONAL EXPERIENCE

9/1/92 - 1/1/93 *GEORGE WASHINGTON UNIVERSITY, GRADUATE SCHOOL OF TELECOMMUNICATIONS.*

Studies: Advanced courses in Public Policy, Electrical Engineering and Economics.

9/1/78 - 6/1/82 *UNIVERSITY OF MARYLAND, B.A., ECONOMICS.*

Studies: Macro and Micro Economics, Statistics, Calculus, Astronomy and Music.