

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of
proposed numbering plan relief
for the 305/786 area code-Dade
County and Monroe County/Keys
Region.

DOCKET NO. 990455-TL

In re: Request for review of
proposed numbering plan relief
for the 561 area code.

DOCKET NO. 990456-TL

In re: Request for review of
proposed numbering plan relief
for the 954 area code.

DOCKET NO. 990457-TL

In re: Request for review of
proposed numbering plan relief
for the 904 area code.

DOCKET NO. 990517-TL

DATED: April 21, 2000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of STAFF'S
DIRECT TESTIMONY AND EXHIBITS has been served by U.S. Mail, this
21st day of April, 2000, to the following:

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CERTIFICATE OF SERVICE

DOCKETS NOS. 990455-TL, 990456-TL, 990457-TL AND 990517-TL

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DIRECT TESTIMONY OF LENNIE FULWOOD

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Q. PLEASE STATE YOUR NAME AND ADDRESS

A. My name is Lennie Fulwood. My business address is 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399.

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

A. I am employed by the Florida Public Service Commission as an Engineer in the Division of Competitive Services.

Q. PLEASE DESCRIBE YOUR POSITION, EDUCATION, AND WORK EXPERIENCE

A. I am an Engineer II in the Numbering and Tariff Section. I received my Bachelor of Science degree in Electrical Engineering from Florida Agriculture and Mechanical University in 1993. I worked as Engineer Property Supervisor at the Marriott Hotel in Tallahassee, FL for four years. Subsequently, I began working for the Florida Public Service Commission on March 25, 1998. Over the last two years, I have worked on various issues related to the telecommunications industry, such as service evaluation, numbering, tariff issues, and interconnection agreements.

Q. HAVE YOU EVER TESTIFIED BEFORE THIS COMMISSION?

A. No. However, I have testified on behalf of the Florida Public Service Commission before the Florida Division of Administrative Hearings, regarding Commission Docket No. 990861-TL, In re: Complaint of Calvin "Bill" Wood against GTE Florida Incorporated regarding service.

1 A. The purpose of my testimony is to provide information on
2 various area code relief alternatives proposed by Commission
3 staff, and to discuss the assumptions used in the calculation of
4 exhaust dates for those relief alternatives. Along with my
5 testimony, I am sponsoring Exhibits LF-1, LF-2, LF-3, LF-4, and
6 LF-5.

7 **Q. WOULD YOU PLEASE DESCRIBE THOSE EXHIBITS?**

8 A. Exhibit LF-1 describes the assumptions underlying the
9 exhaust date calculations, and has a table that illustrates how
10 exhaust dates are calculated. Exhibits LF-2, LF-3, LF-4, and LF-
11 5 are the area code relief alternatives for area codes 305/786,
12 561, 954, and 904 respectively. In Exhibit LF-2 through LF-5,
13 the last numbered alternative indicates the total number of
14 alternatives for that area; however, the Exhibits only set forth
15 the actual plans proposed by staff.

16 **Q. COULD YOU PLEASE STATE THE TOTAL NUMBER OF PROPOSED**
17 **ALTERNATIVES FOR AREA CODE RELIEF IN THE**

18 **A) 305/786 AREA CODES,**

19 **B) 561 AREA CODE,**

20 **C) 954 AREA CODE, AND**

21 **D) 904 AREA CODE.**

22 A. A) 13 (See Exhibit LF-2)

23 B) 12 (See Exhibit LF-3)

24 C) 4 (See Exhibit LF-4)

25 D) 17 (See Exhibit LF-5)

- 1 Q. COULD YOU PLEASE STATE THE TOTAL NUMBER OF STAFF'S
2 ALTERNATIVES FOR AREA CODE RELIEF IN THE
3 A) 305/786 AREA CODES,
4 B) 561 AREA CODE,
5 C) 954 AREA CODE,
6 D) 904 AREA CODE.
- 7 A. A) 8 (See Exhibit LF-2 Alternatives #6-13)
8 B) 7 (See Exhibit LF-3 Alternatives #6-12)
9 C) 2 (See Exhibit LF-4 Alternatives #3,#4)
10 D) 11 (See Exhibit LF-5 Alternatives #7-17)
- 11 Q. WHICH ALTERNATIVE WAS RECOMMENDED BY THE INDUSTRY TO THE
12 FLORIDA PUBLIC SERVICE COMMISSION IN THE
13 A) 305/786 AREA CODES,
14 B) 561 AREA CODE,
15 C) 954 AREA CODE, AND
16 D) 904 AREA CODE?
- 17 A. A) Alternative #1 (Overlay)
18 B) Alternative #1 (Overlay)
19 C) Alternative #1 (Overlay)
20 D) Alternative #1 (Overlay)
- 21 Q. WOULD YOU DESCRIBE AN OVERLAY?
22 A. An overlay is the process of assigning a new area code to a
23 geographic area where another area code is already in existence.
24 In an overlay, all new local telephone numbers in the geographic
25 area will be assigned to the new area code once available numbers

1 | are exhausted in the old' area code, and 10-digit dialing (area
2 | code + seven-digit phone number) is required for all local calls.

3 | **Q. WHAT ASSUMPTIONS ARE MADE REGARDING HOW THE YEARS TO EXHAUST**
4 | **ARE CALCULATED?**

5 | A. As set forth in Exhibit LF-1, there are two assumptions in
6 | calculating the exhaust years or dates for all the alternatives.
7 | Assumption #1 is that code growth continues at the same rate from
8 | the second quarter of 1999 to the fourth quarter of 2001 levels.
9 | Assumption #2 is that code growth is reduced by 50 percent beyond
10 | the fourth quarter of 2001. These assumptions are the same
11 | assumptions that the North American Numbering Plan Administrator
12 | (NANPA) uses in calculating the exhaust dates and years.

13 | **Q. DID THE INDUSTRY USE THESE ASSUMPTIONS WHEN CALCULATING**
14 | **EXHAUST DATES IN THEIR ALTERNATIVES?**

15 | A. Yes.

16 | **Q. DID STAFF USE THE SAME ASSUMPTIONS WHEN CALCULATING EXHAUST**
17 | **DATES IN THEIR ALTERNATIVES?**

18 | A. Yes.

19 | **Q. IN YOUR OPINION ARE THESE ASSUMPTIONS ACCURATE, AND IF SO,**
20 | **ARE THE EXHAUST DATES ACCURATE?**

21 | A. No, because the assumptions use linear arithmetic.

22 | **Q. IF THE ASSUMPTIONS ARE INACCURATE, WHY DID STAFF USE THESE**
23 | **ASSUMPTIONS WHEN CALCULATING EXHAUST DATES FOR STAFF'S PROPOSED**
24 | **ALTERNATIVES FOR AREA CODE RELIEF?**

25 | A. Staff used these assumptions because they are the same

1 | assumptions NANPA used when calculating its exhaust dates.
2 | Further, staff is unaware of the existence of any other
3 | methodology or set of assumptions that would result in a more
4 | accurate exhaust date calculation.

5 | **Q. SHOULD THE COMMISSION APPROVE THE INDUSTRY'S CONSENSUS**
6 | **RELIEF PLANS FOR THE FOLLOWING AREA CODES:**

7 | **A) 305/786,**

8 | **B) 561,**

9 | **C) 954, AND**

10 | **D) 904?**

11 | **A.** I have no position at this time.

12 | **Q. IF THE COMMISSION DOES NOT APPROVE THE INDUSTRY'S**
13 | **RECOMMENDED ALTERNATIVES, ARE THERE ANY ALTERNATIVES THAT**
14 | **YOU WOULD RECOMMEND TO THE COMMISSION FOR THE**

15 | **A) 305/786 AREA CODES,**

16 | **B) 561 AREA CODE,**

17 | **C) 954 AREA CODE, AND**

18 | **D) 904 AREA CODE?**

19 | **A.** Possible alternatives to the industry's consensus relief
20 | plan, beyond those offered by the industry, are set forth in
21 | Exhibits LF-2 through LF-5. All alternatives proposed in these
22 | dockets have their own advantages and disadvantages. The
23 | evidence will dictate the best alternative.

24 | **Q. WOULD YOU RECOMMEND THAT THE COMMISSION IMPLEMENT NUMBER**
25 | **CONSERVATION MEASURES ALONG WITH AREA CODE RELIEF PLANS?**

1 A. Yes.

2 Q. WHAT NUMBER CONSERVATION MEASURE(S) SHOULD BE IMPLEMENTED
3 FOR THE FOLLOWING AREA CODES:

4 A) 305/786,

5 B) 561,

6 C) 954, AND

7 D) 904?

8 A. Any number conservation measures which will increase the
9 efficiency of how numbers are used would be acceptable.

10 Q. IF NUMBER CONSERVATION MEASURES ARE TO BE IMPLEMENTED, WHEN
11 SHOULD THEY BE IMPLEMENTED?

12 A. It depends on the type of number conservation measures(s)
13 approved, but as soon as possible.

14 DOES THIS CONCLUDE YOUR TESTIMONY?

15 A. Yes, it does.

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EXHIBIT NO: LF-1

**DOCKET Nos: 990455-TL, 990456-TL, 990457-TL, and
990517-TL**

WITNESS: LENNIE FULWOOD

DESCRIPTION:

Standard assumptions used in calculation of exhaust dates

Calculation of Exhaust Dates

There are two assumptions used in calculating the exhaust years or dates for all the alternatives. Assumption #1 is that code growth continues at the same rate from the second quarter of 1999 to the fourth quarter of 2001. Assumption #2 is that code growth is reduced by 50 percent beyond the fourth quarter of 2001. These assumptions are the same assumptions that the North American Numbering Plan Administration (NANPA) used in calculating the exhaust dates and years.

NANPA conducts Central Office Code Utilization Survey (COCUS) twice a year from the industry. Based on industry information and the information provided by the Location Exchange Routing Guide (LERG), NANPA calculates the growth rates. Once this is achieved, using simple arithmetics, the approximate exhaust dates and years of a particular relief plan can be approximated.

An illustration is given in the following table for the 954 area code for Alternative #4. Please note that rounding errors may result in different values than the ones presented at the April 6, 2000, area code workshop.

AREA CODE EXHAUST CALCULATION

954 Area Code: Alternative #4							
CO Codes in Service		Forecasted Growth		Area A		Area B	
Rate Center	Total Codes	Total at Exhaust	2.75 Year Growth	Total At Exhaust	2.75 Year Growth	Total At Exhaust	2.75 Year Growth
Coral Springs	25	36	11	36	11	0	0
Deerfield Beach	56	79	23	79	23	0	0
Ft. Lauderdale	337	473	136	0	0	473	136
Hollywood	72	101	29	101	29	0	0
Pompano Beach	53	75	22	75	22	0	0
Total Codes	543	764	221	291	85	473	136
				a	b	a	b
Area Code Life Under Assumption #1¹							
c Number of area codes serving the territory				1		1	
d Number of assignable NXX codes in an NPA(s) (764*c)				764		764	
e Number of working NXX codes at exhaust				291		473	
f Number of available NXX codes per assignment (d-e)				473		291	
g Average forecasted code growth per year 2Q1999-4Q2001 (b/2.75)				31		49	
h Area code life in years (f/g) Relief 4Q2001				15.3		5.9	
Area Code Life Under Assumption #2²							
i Number of available NXX codes per assignment (f)				473		291	
j Forecasted code growth per year beyond 4Q2001 (g/2)				15		25	
k Area code life in years (i/j)				30.5		11.6	

¹ Code growth continues at second quarter of 1999 to fourth quarter of 2001 levels.

² Code growth is reduced by 50% beyond 4Q2001.

EXHIBIT NO: LF-2

**DOCKETS NOS. : 990455-TL, 990456-TL, 990457-TL, and
990517-TL**

WITNESS: LENNIE FULWOOD

DESCRIPTION:

**Composite exhibit of area code relief plan alternatives for the
305/786 area code**

305/786 AREA CODE RELIEF ALTERNATIVES

Alternative #6 is a split and expanded overlay combination plan that utilizes two new NPAs. The new NPA for the Miami-Dade region (North Dade, Miami, Perrine and Homestead exchanges) would be an overlay, and would be implemented upon the exhaust of the 786 NPA. The Keys region (North Key Largo, Key Largo, Islamorada, Marathon, Big Pine Key, Sugar Loaf Key, and Key West exchanges) would get a new NPA with an approximate exhaust of 38 years. This plan would not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The projected exhaust for this plan is 9.3 years for the Miami-Dade region.

Alternative #7 is a combination of split and overlay relief plans. Currently, Miami-Dade uses the 305 and 786 area codes as an overlay. The Keys region uses only the 305 area code. This plan proposes that the Miami and North Dade exchanges are overlaid with a new NPA (NPA #1). The approximate exhaust for this area is 9.4 years. The Perrine and Homestead exchanges are overlaid with a different new NPA (NPA #2), and the approximate exhaust for this area is 23.2 years. The Keys region uses some of the NXXs from NPA #2, and its approximate exhaust is 22.5 years.

Alternative #8 is a split plan, which divides the Miami-Dade region (the shaded area) and the Keys region. This plan does not require a new NPA, but rather changes the NPA for the Keys region to 941, which is the NPA for the mainland region of Monroe County. This plan will not involve any number changes for existing subscribers in the Miami-Dade region, but would require an NPA change for the Keys region. The approximate exhaust for this plan is 4.3 years for the Miami-Dade region, and 2.5 years for the Keys area.

Alternative #9 is similar to Alternative #8, but it uses the existing 863 NPA instead of the 941 NPA. The approximate exhaust for this plan is 4.3 years for the Miami-Dade region, and 6.1 years for the Keys region.

Alternative #10 is similar to Alternatives #8 & #9; however, the Keys region will use a portion of the 786 NXXs from the Miami-Dade overlay area. The approximate exhaust for this plan is 3 years for the Miami-Dade and the Keys regions.

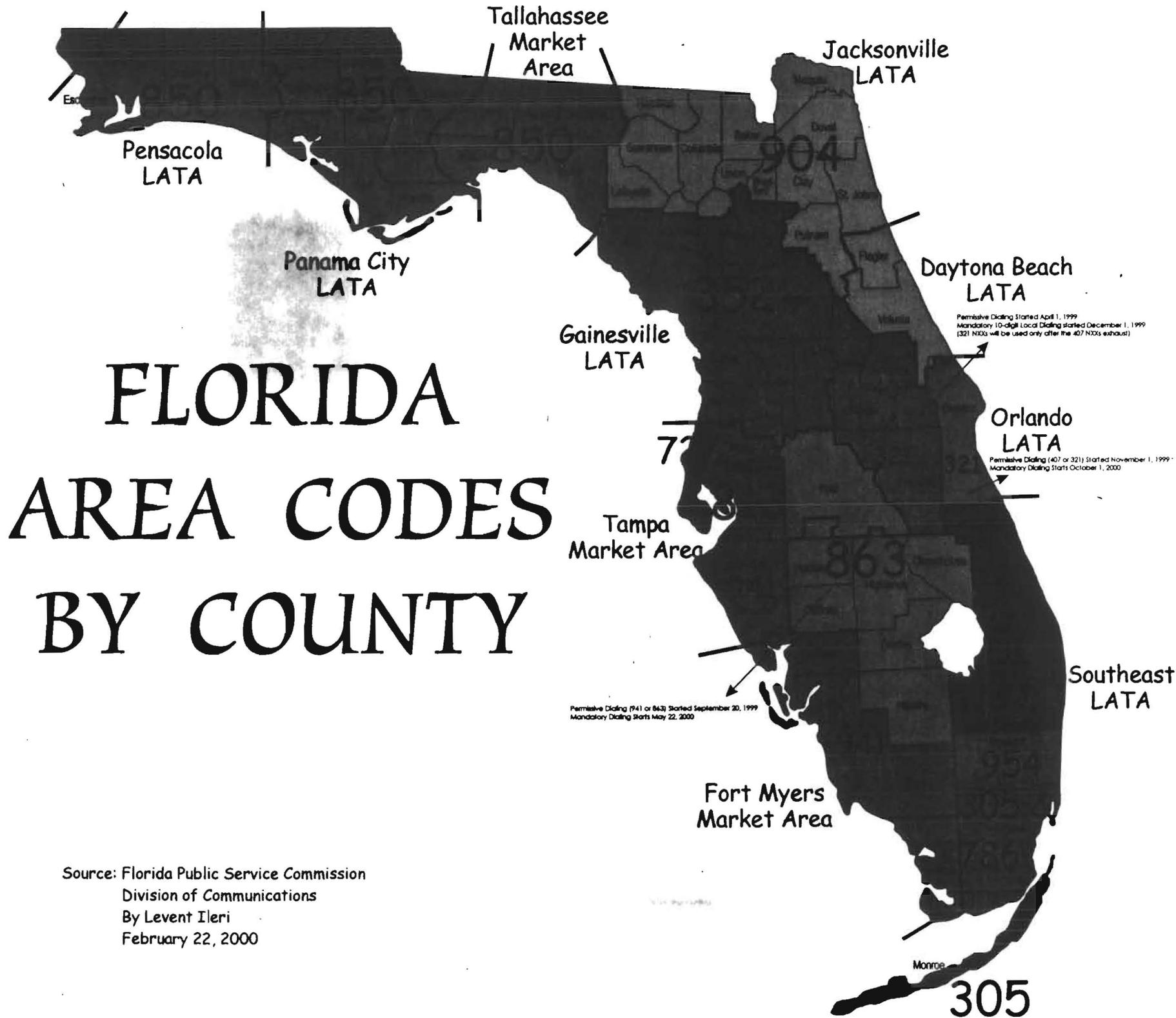
Alternative #11 is a combination of split and overlay plans, which is similar to Alternative #6. This plan uses Number Conservation

Measures. The approximate exhaust for this plan is 14.7 years for the Miami-Dade area, and 24 years for the Keys area.

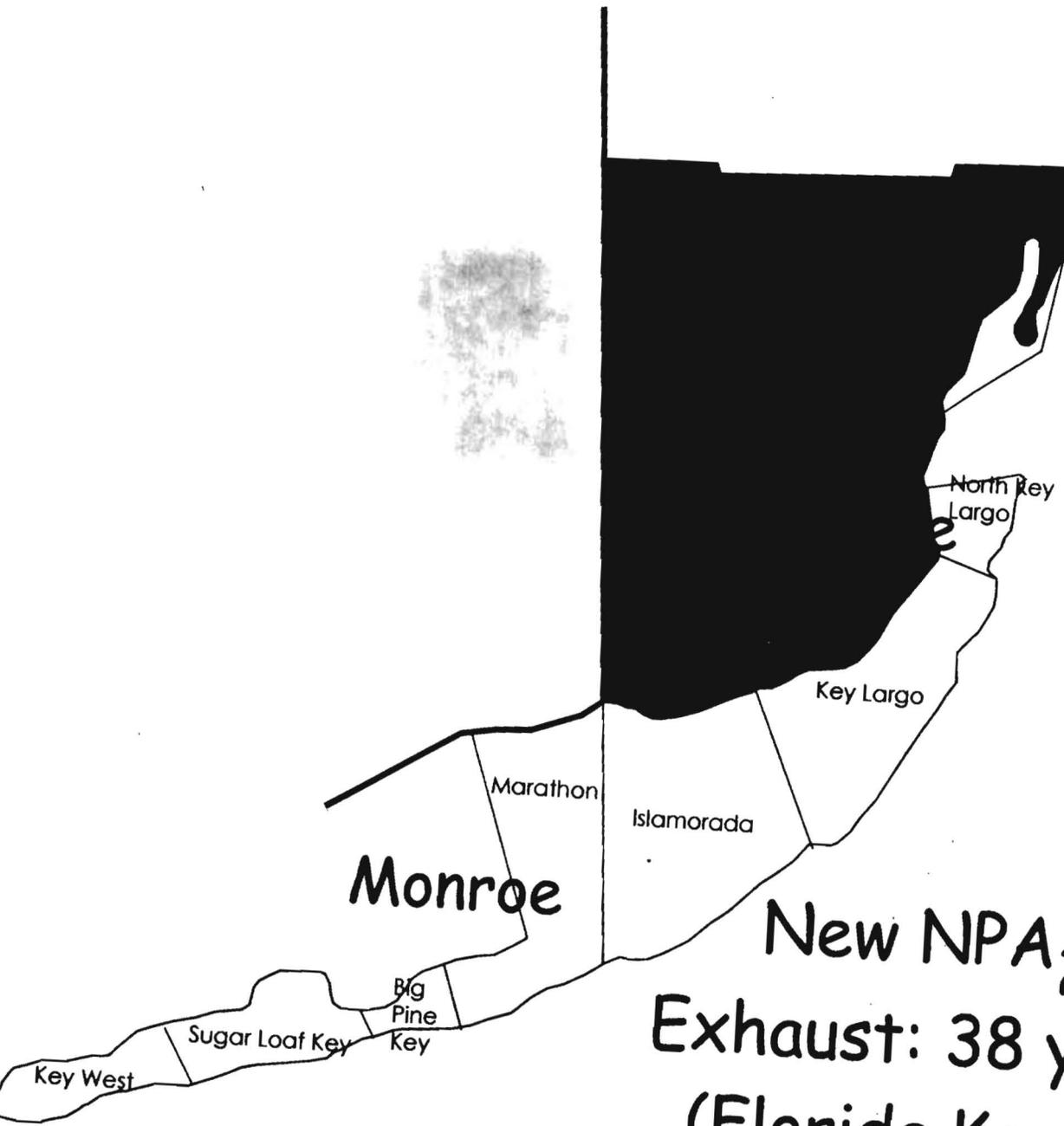
Alternative #12 is an overlay plan which uses Number Conservation Measures. The approximate exhaust for this plan is 15.6 years.

Alternative #13 is a combination of split and overlay relief plans which divides the Miami-Dade region from the Keys region. The Miami-Dade region uses the 305, 786, and a new NPA, but the remainder of the 786 NXXs are distributed over the Keys area to last for 18.2 years. The Miami-Dade region has an approximate exhaust of 5.3 years.

Pages 4 through 11 graphically display these alternatives.



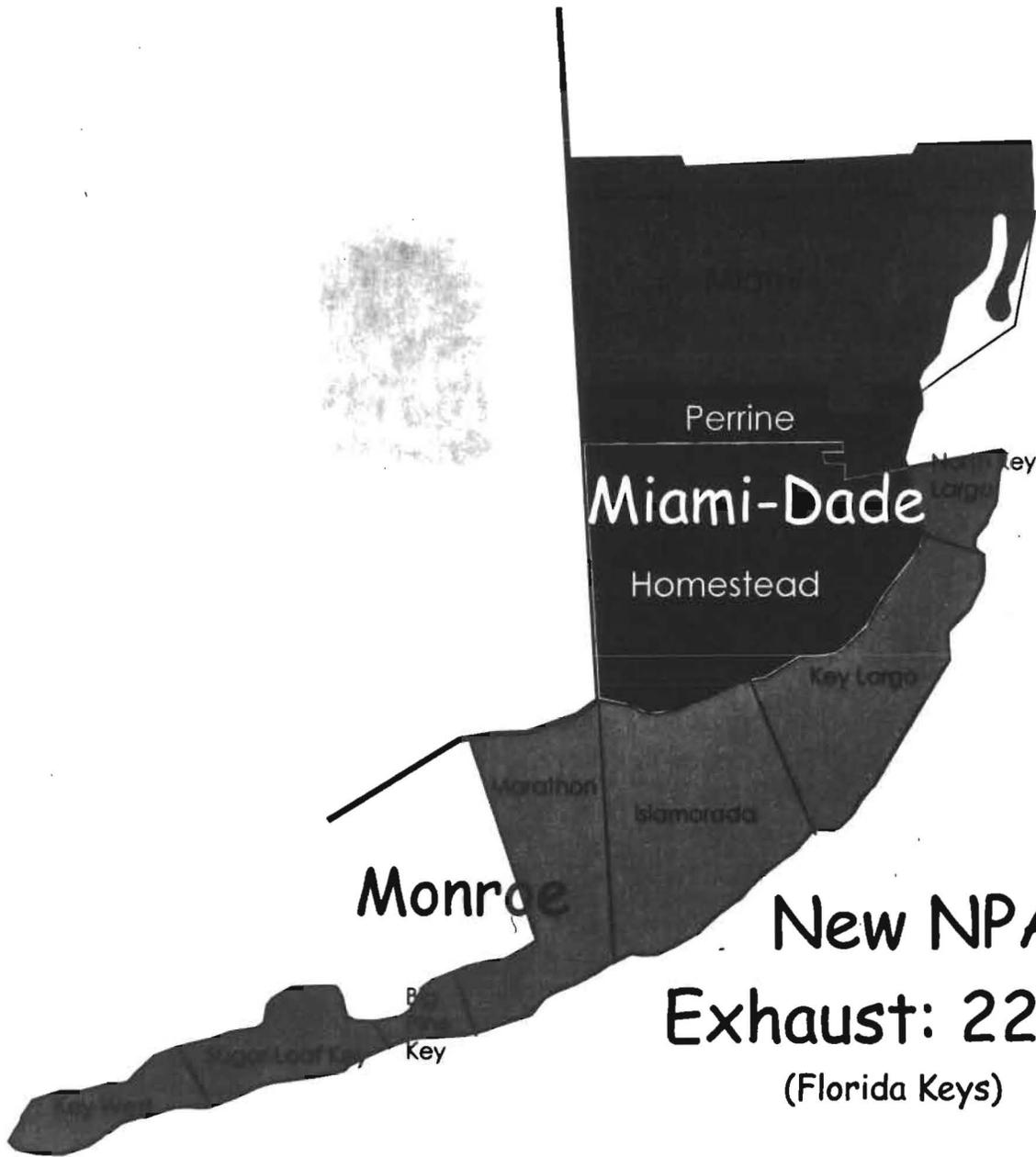
Source: Florida Public Service Commission
 Division of Communications
 By Levent Ileri
 February 22, 2000



305, 786 & New NPA₁
Exhaust: 9.3 years
(Miami-Dade)

New NPA₂
Exhaust: 38 years
(Florida Keys)

Alternative #6 (Split and Expanded Overlay)

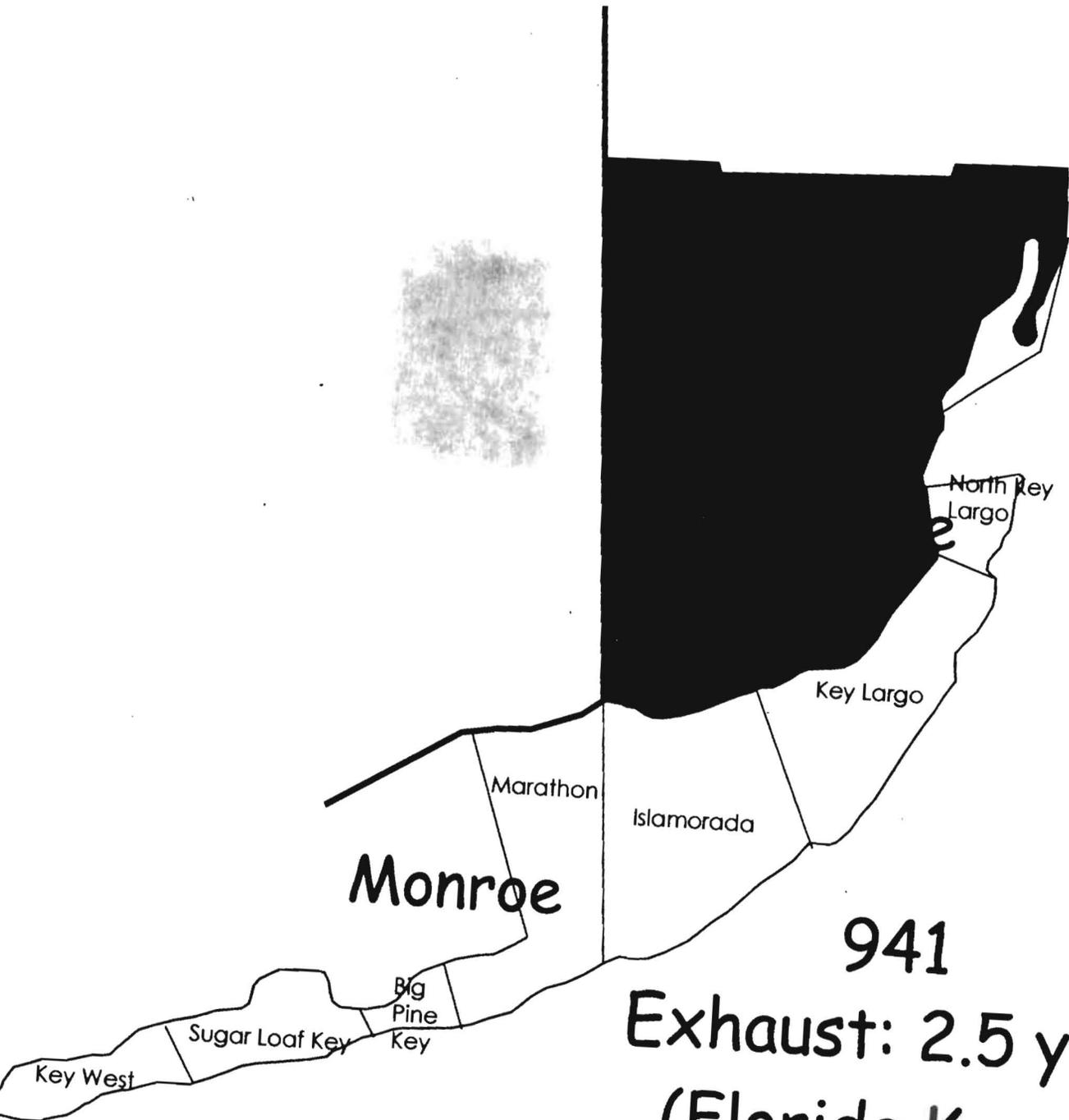


305, 786 & New NPA₁
 Exhaust: 9.4 years
 (North Dade and Miami Exchanges)

305, 786 & New NPA₂
 Exhaust: 23.2 years
 (Perrine and Homestead Exchanges)

New NPA₂
 Exhaust: 22.5 years
 (Florida Keys)

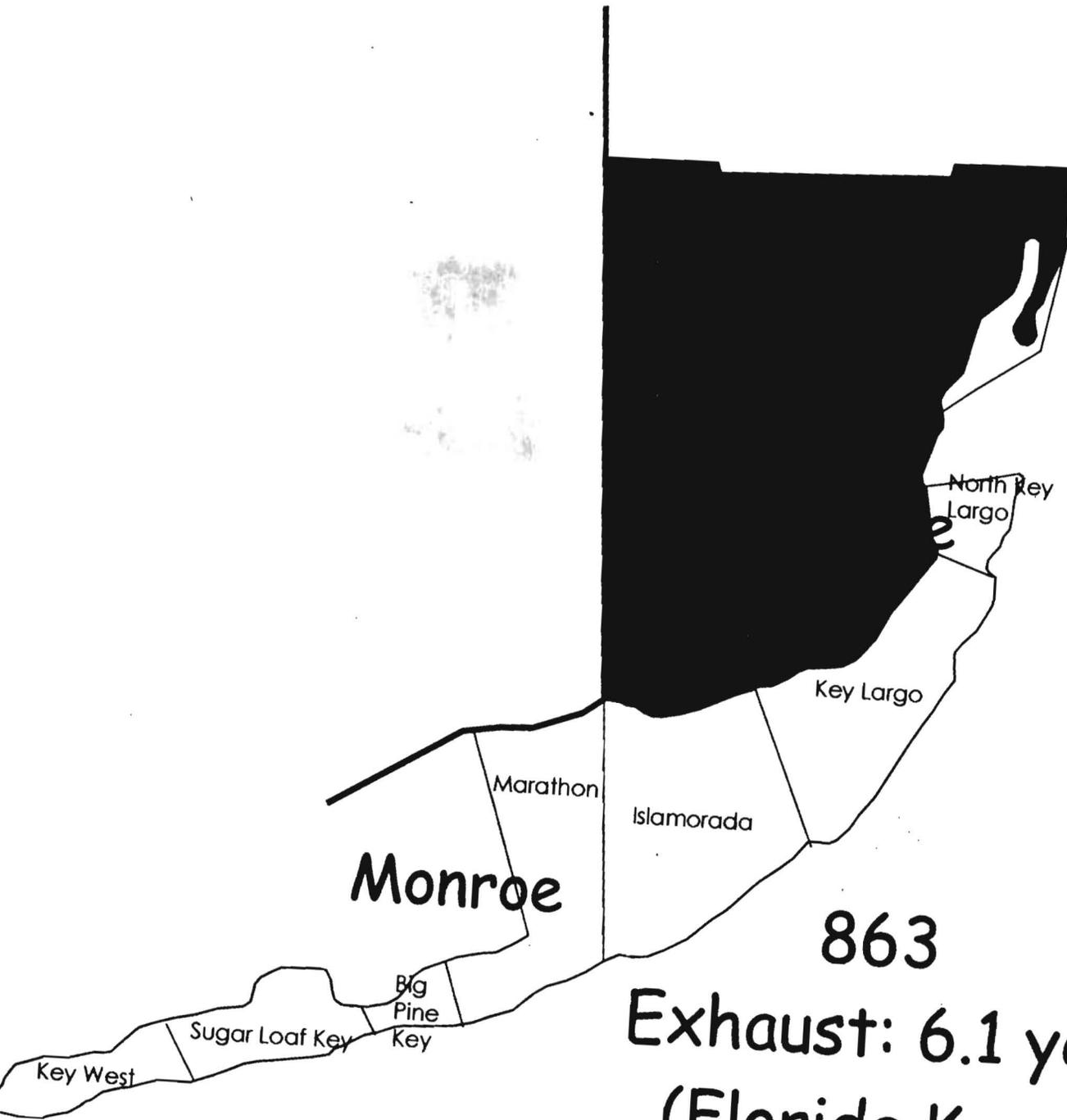
Alternative #7 (Split and Double Expanded Overlay)



305 & 786
Exhaust: 4.3 years
(Miami-Dade)

941
Exhaust: 2.5 years
(Florida Keys)

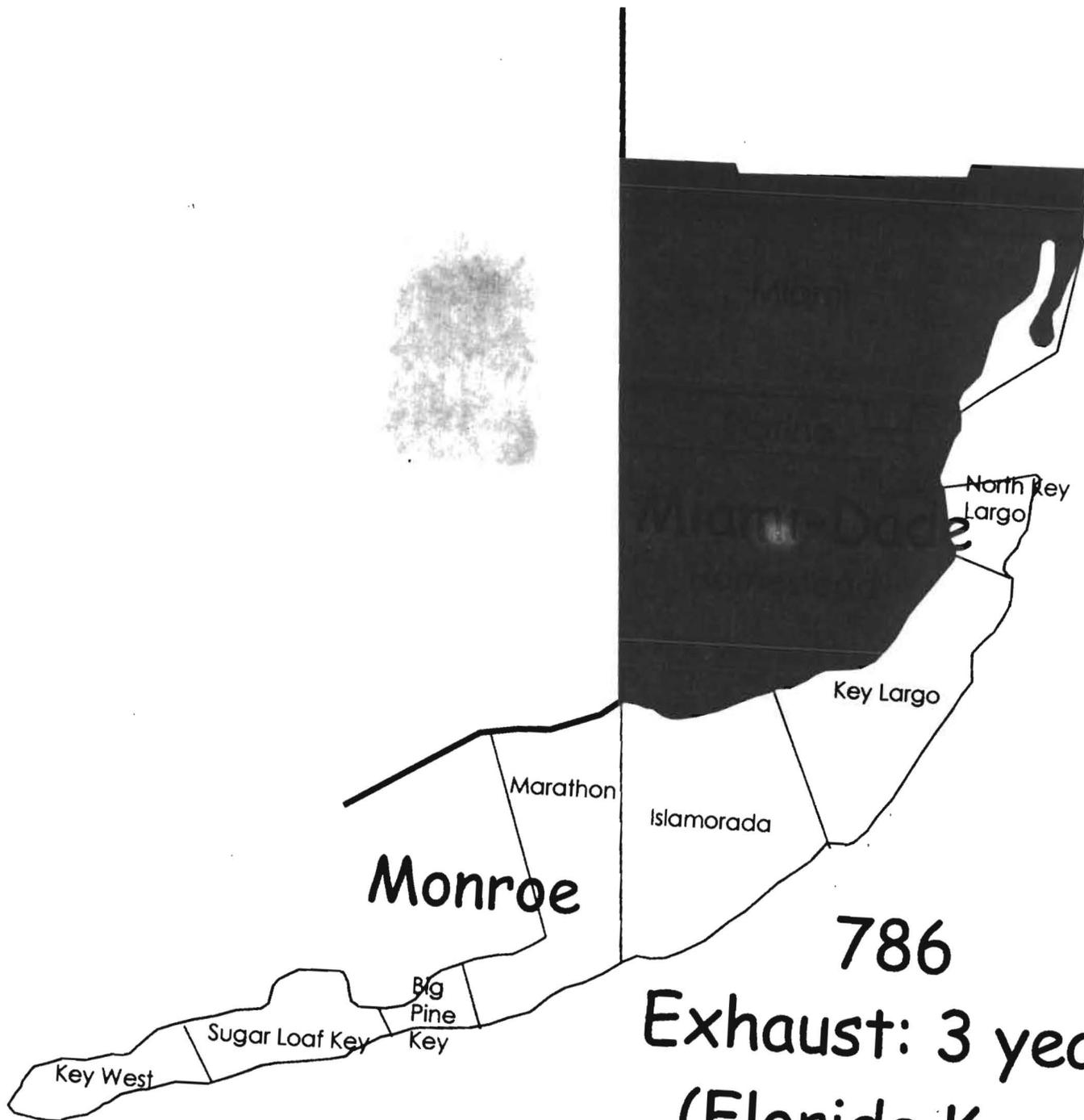
Alternative #8 (Expanded Split)



305 & 786
Exhaust: 4.3 years
(Miami-Dade)

863
Exhaust: 6.1 years
(Florida Keys)

Alternative #9 (Expanded Split)



305 & 786
Exhaust: 3 years
(Miami-Dade)

786
Exhaust: 3 years
(Florida Keys)

Alternative #10 (Expanded Split)



305, 786 & New NPA
Exhaust: 14.7 years

New NPA

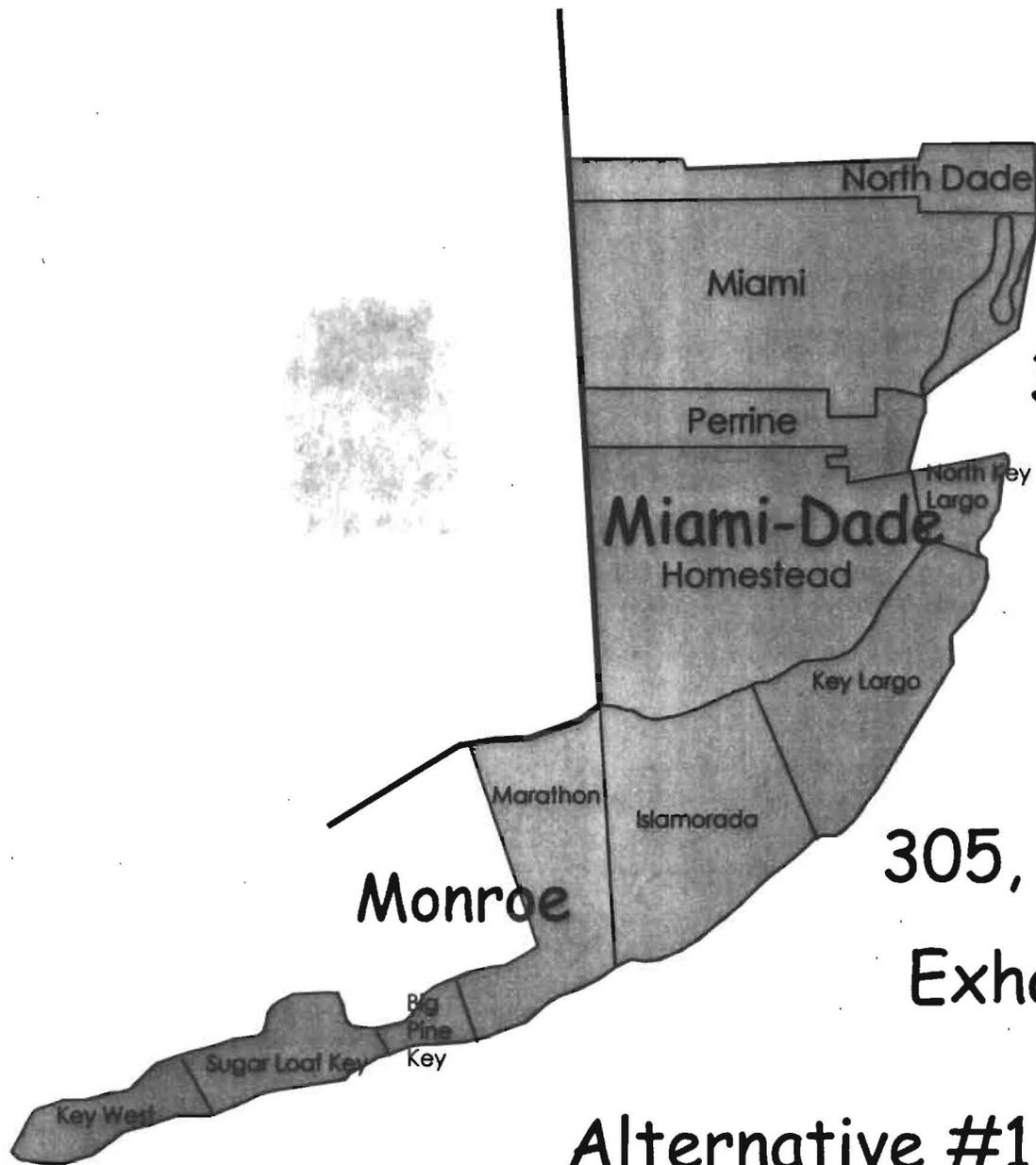
Exhaust: 24 years

Note: Only 297 NXXs in the new NPA will be reserved for the Keys

Alternative #11

Split and Expanded Overlay with Number Conservation

Measures (e.g., Thousand-block Number Pooling, Reclamation of Unused and Reserved NXXs, and Rate Center Consolidation)



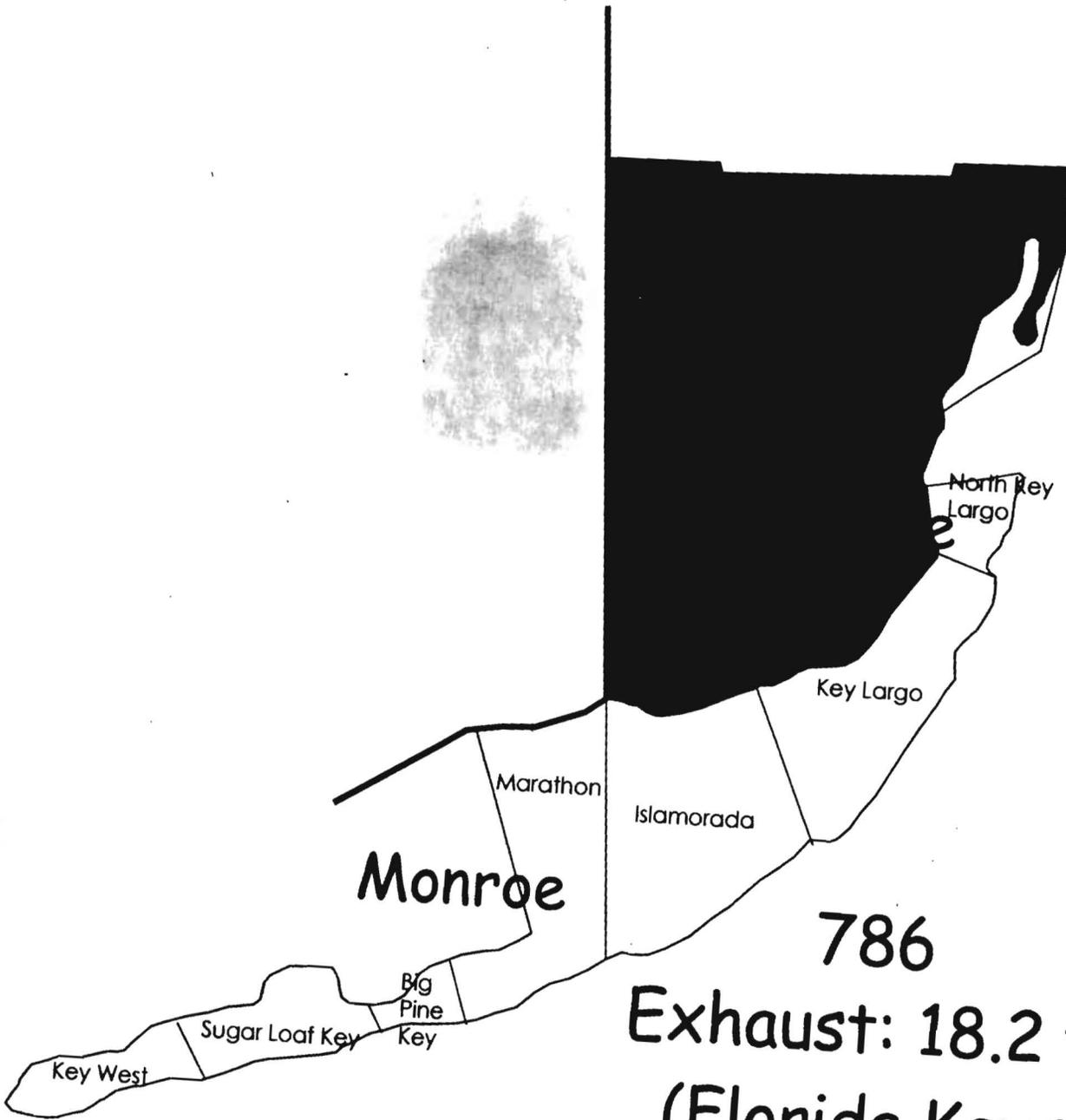
305, 786 and New NPA
Exhaust: 15.6 years

305, 786 and New NPA
Exhaust: 15.6 years

Alternative #12

Expanded Overlay with Number Conservation Measures
(e.g., Thousand-block Number Pooling, Reclamation of

Unused and Reserved NXXs, and Rate Center Consolidation)



305, 786, & New NPA
Exhaust: 5.3 years
(Miami-Dade)

786
Exhaust: 18.2 years
(Florida Keys)

Alternative #13 (Expanded Split)

EXHIBIT NO: LF-3

**DOCKETS NOS. : 990455-TL, 990456-TL, 990457-TL, and
990517-TL**

WITNESS: LENNIE FULWOOD

DESCRIPTION:

**Composite exhibit of area code relief plan alternatives for the
561 area code**

561 AREA CODE RELIEF ALTERNATIVES

Alternative #7 is a geographic split relief plan, with the West Palm Beach exchange split to form Area B. Area A covers the remaining exchanges. The approximate exhaust for Area A is 5.3 years, and 14.7 years for Area B.

Alternative #8 is a combination of split and overlay relief plans in which all of the exchanges (Area B) will retain the 561 area code. All of the exchanges except the West Palm exchange will be overlaid with a new area code (Area A). The approximate exhaust for Areas A and B is 19.3 years, and 14.7 years for Area A.

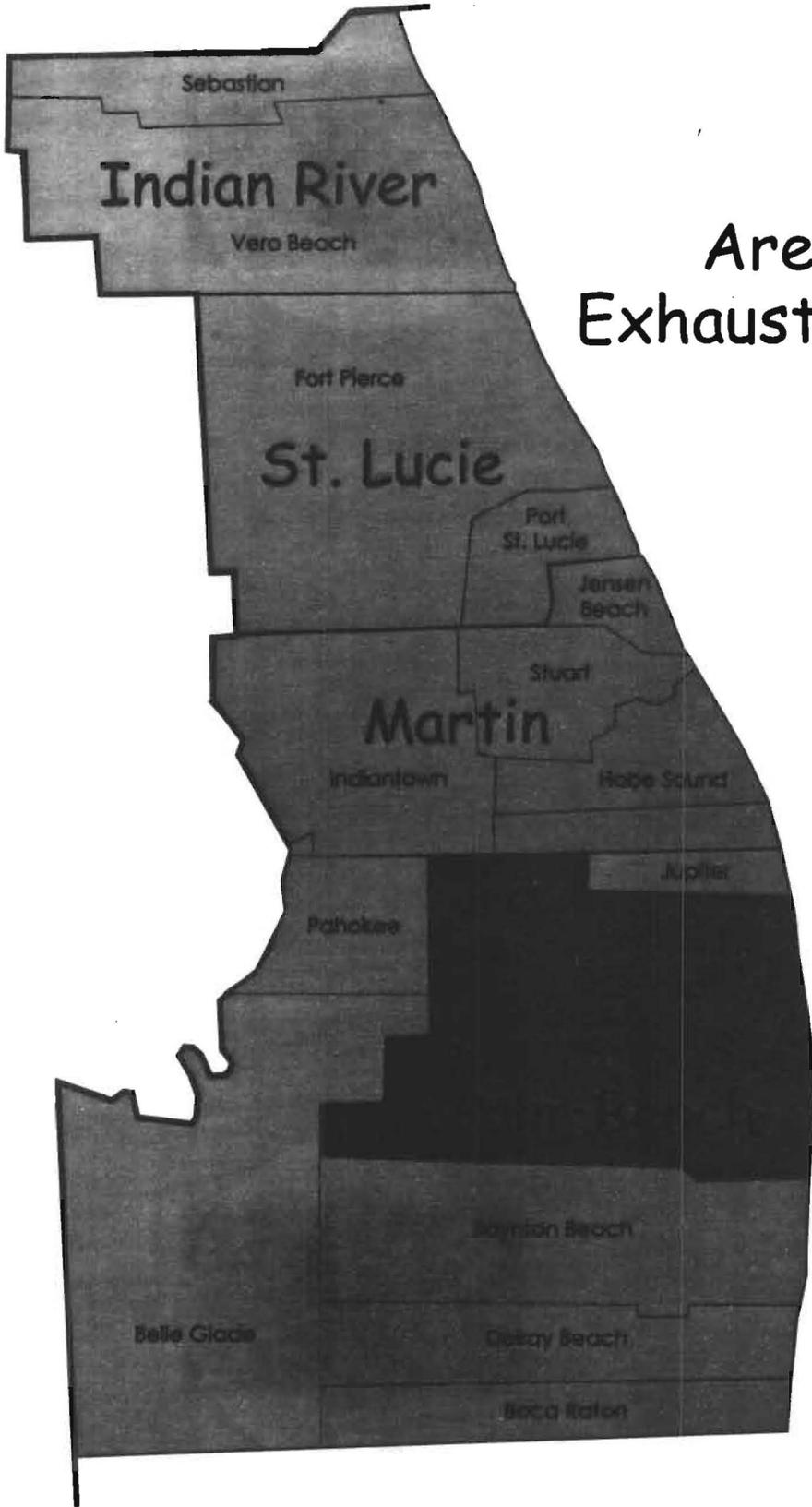
Alternative #9 is a geographic split relief plan, with the Port Saint Lucie, Jensen Beach, Stuart, Hobe Sound, Jupiter, and West Palm Beach exchanges split to form Area B. Area A covers the remaining exchanges. The approximate exhaust for Area A is 10.5 years, and 7.3 years for Area B.

Alternative #10 is a combination of split and overlay relief plans in which all exchanges (Area B) will retain the 561 area code. All of the exchanges except the Boynton Beach, Jupiter, and West Palm Beach exchanges will be overlaid with a new area code (Area A). The approximate exhaust for Areas A and B is 26.2 years, and 7.6 years for Area B.

Alternative #11 is an overlay relief plan that employs Number Conservation Measures. The approximate exhaust for this relief plan is 20 years.

Alternative #12 is a split relief plan similar to Alternative #9, that employs Number Conservation Measures. The approximate exhaust for Area A is 21 years, and 14.8 years for Area B.

Pages 2 through 7 graphically display these alternatives.



Area A
Exhaust: 5.3 years

Area B
Exhaust: 14.7 years

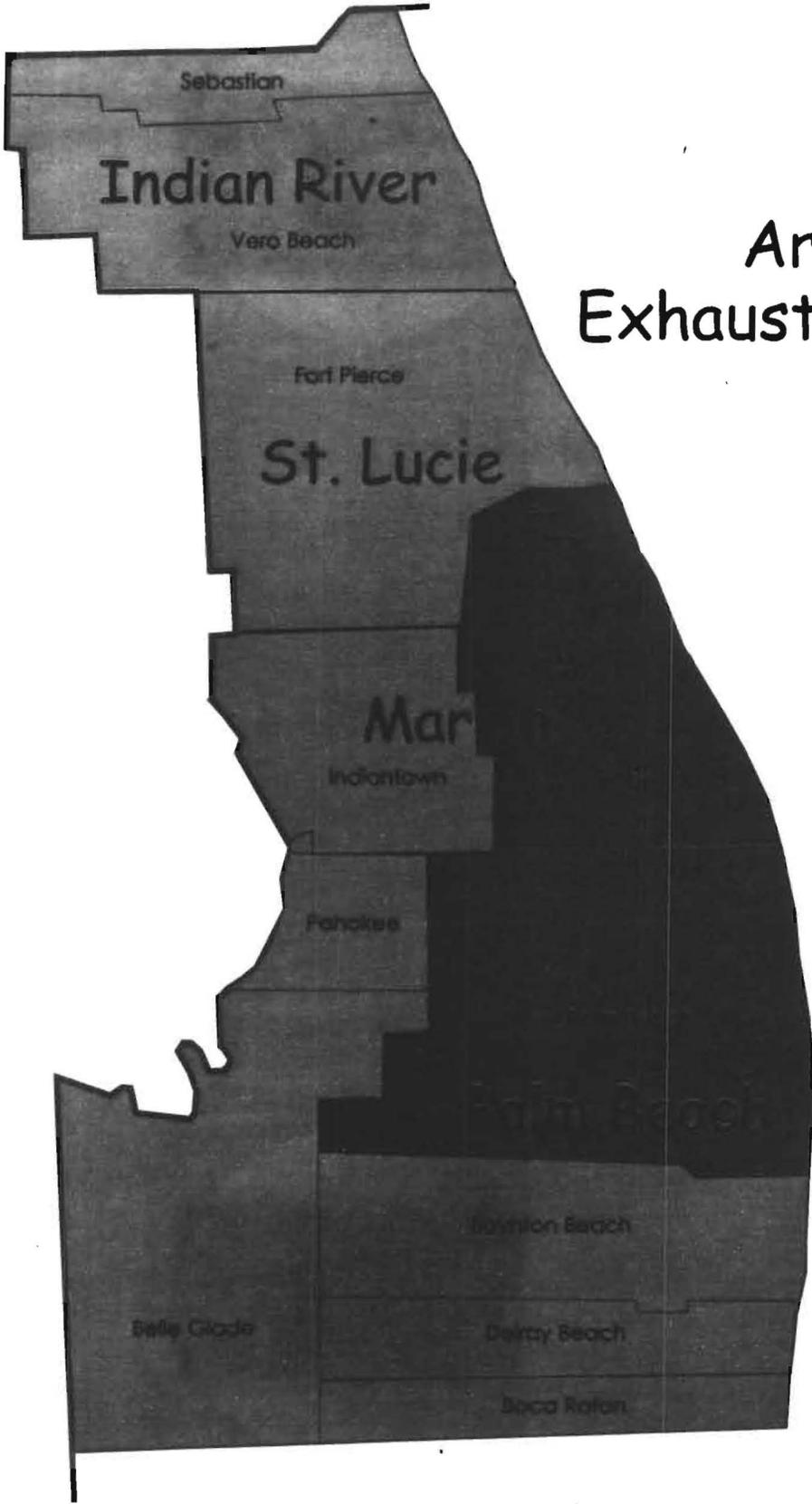
Alternative #7 Geographic Split



Area A and B (Overlay)
Exhaust: 19.3 years

Area B (Split)
Exhaust: 14.7 years

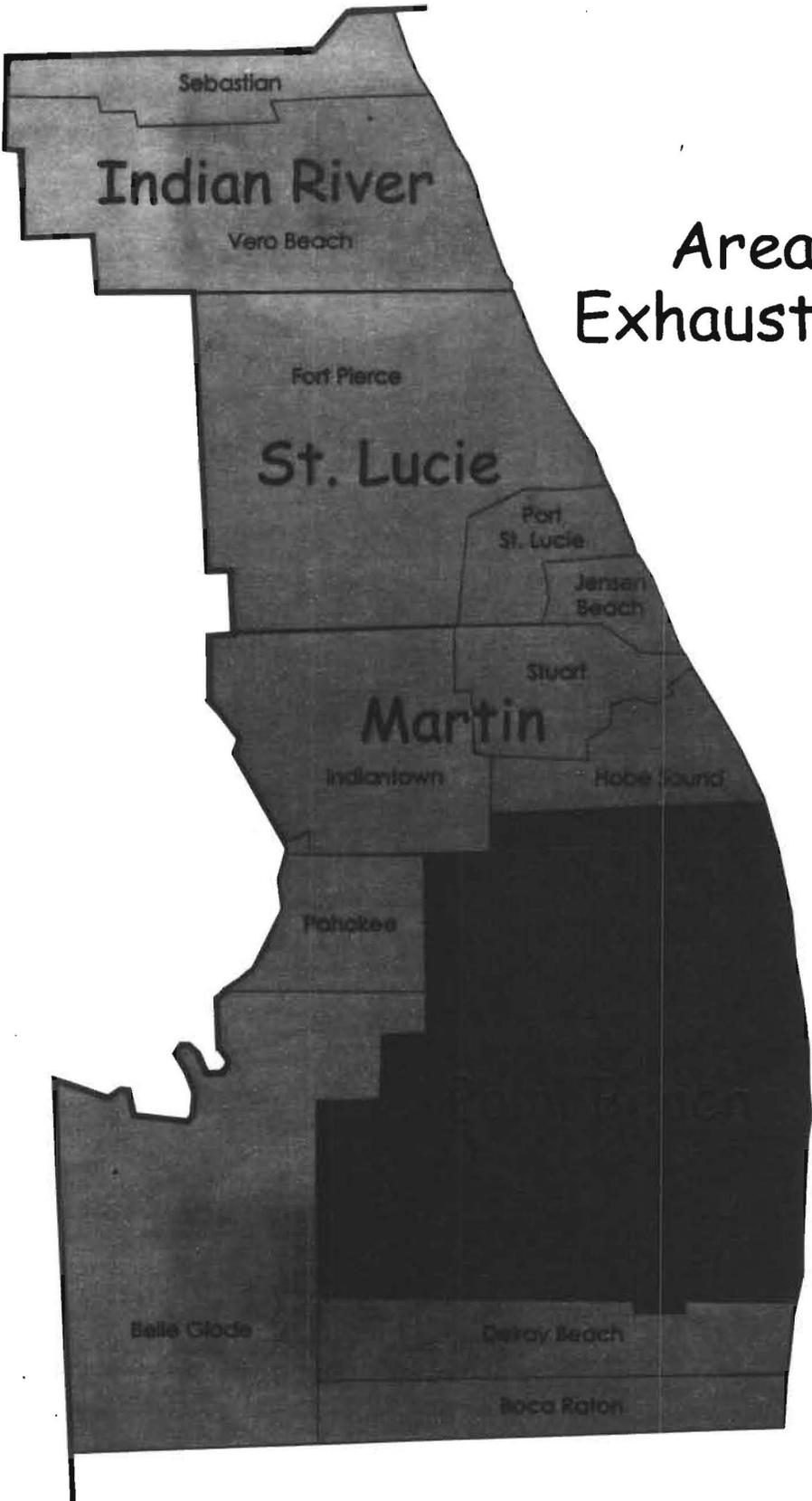
Alternative #8
Geographic Split and Overlay



Area A
Exhaust: 10.5 years

Area B
Exhaust: 7.3 years

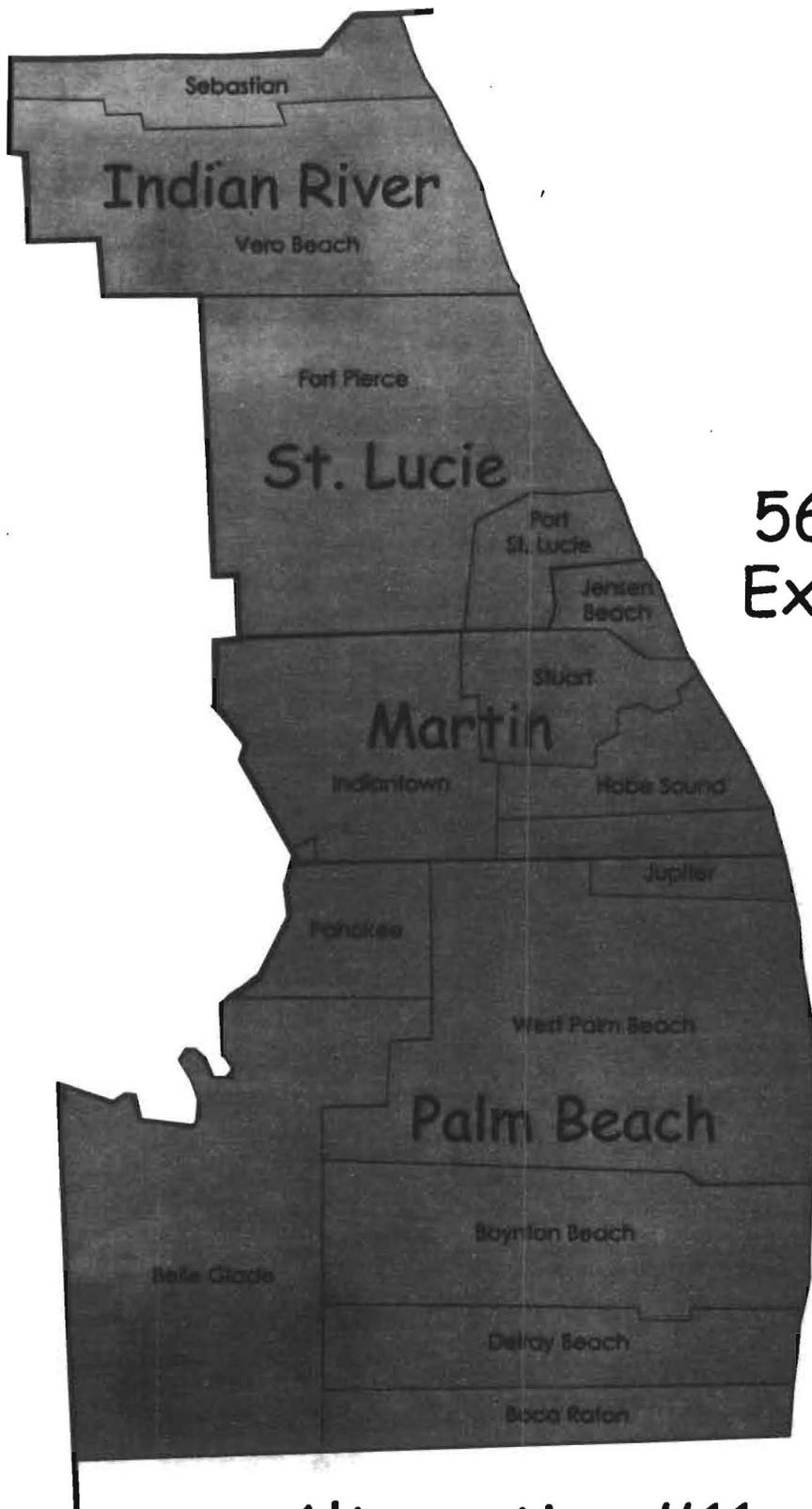
Alternative #9
Geographic Split



Area A and B
Exhaust: 26.2 years

Area B
Exhaust: 7.6 years

Alternative #10
Geographic Split and Overlay



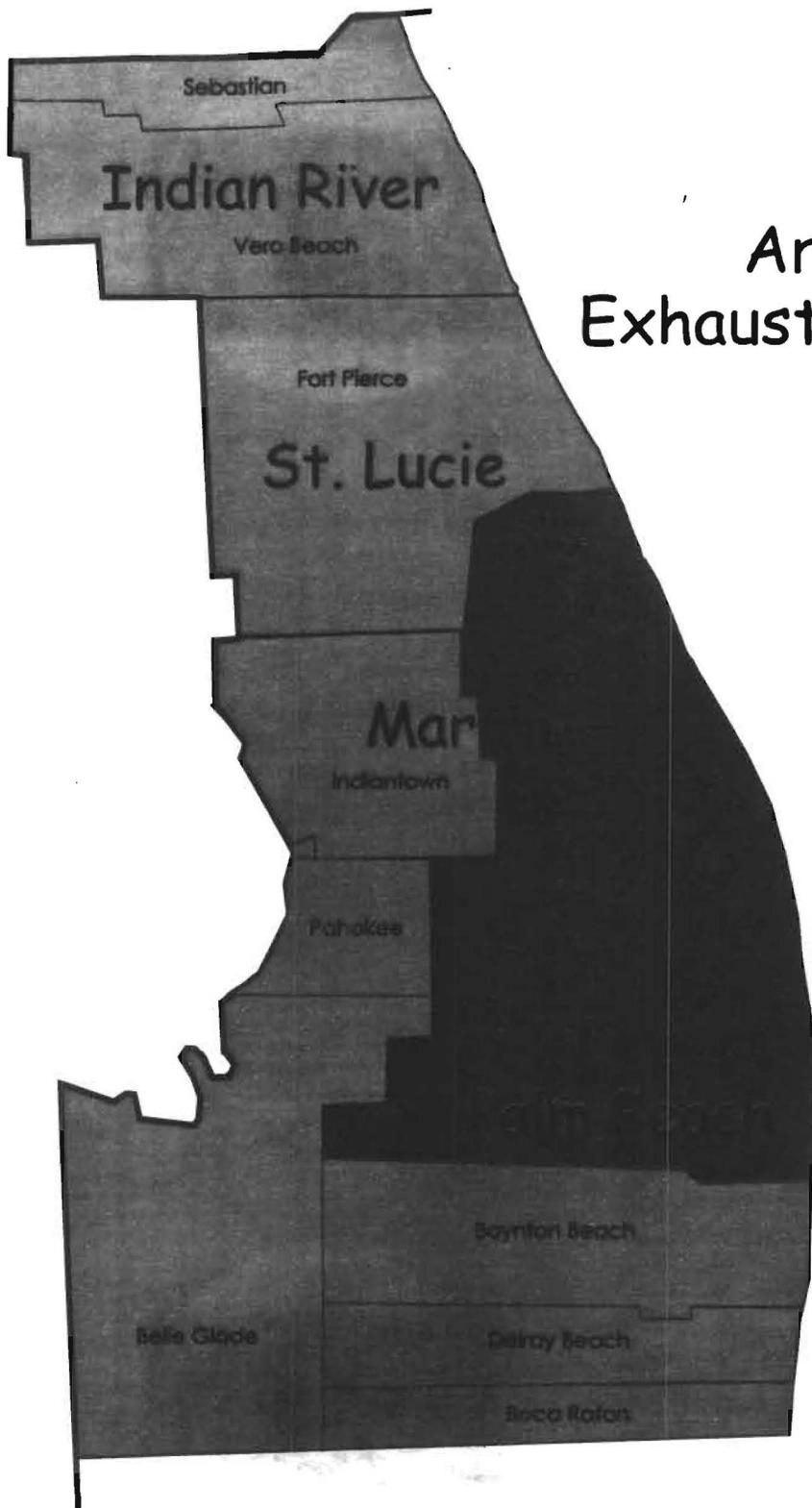
561 and New NPA
Exhaust: 20 years

Alternative #11

Overlay with

Number Conservation Measures

(e.g., Thousand-block number pooling, Reclamation of Unused and Reserved NXXs, and Rate Center Consolidation)



Area A
Exhaust: 21 years

Area B
Exhaust: 14.6 years

Alternative #12
Geographic Split with
Number Conservation Measures
(e.g., Thousand-block number pooling, Reclamation of
Unused and Reserved NXXs, and Rate Center Consolidation)

EXHIBIT NO: LF-4

**DOCKETS NOS. : 990455-TL, 990456-TL, 990457-TL, and
990517-TL**

WITNESS: LENNIE FULWOOD

DESCRIPTION:

**Composite exhibit of area code relief plan alternatives for the
954 area code**

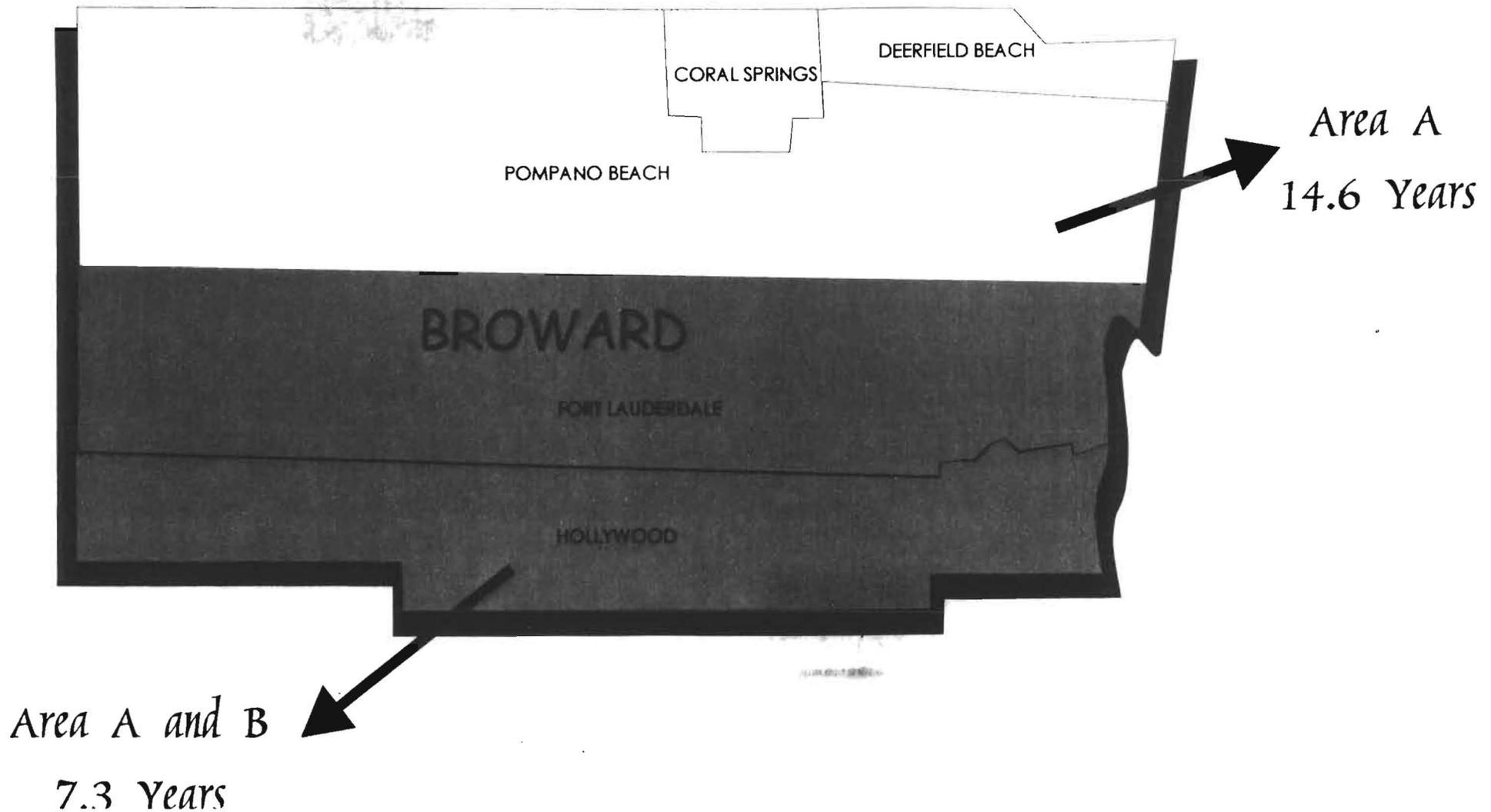
954 AREA CODE RELIEF ALTERNATIVES

Alternative #3 is a combination of split and overlay relief plans in which all of the exchanges (Area A) will retain the 954 area code. The Ft. Lauderdale and Hollywood exchanges will be overlaid with a new area code (Area B). The approximate exhaust of Area A is 14.6, and that of the overlay area (Areas A and B) is 7.3 years.

Alternative #4 is a geographic split plan in which one new area code will be assigned. Area B includes the Ft. Lauderdale exchange. The remainder of the exchanges are located in Area A. The approximate exhaust for Area A is 15.3 years, and that for Area B is 5.9 years.

Pages 2 and 3 graphically display these alternatives.

954 Area Code
Alternative #3
Geographic Split and Overlay



954 Area Code

Alternative #4

Geographic Split

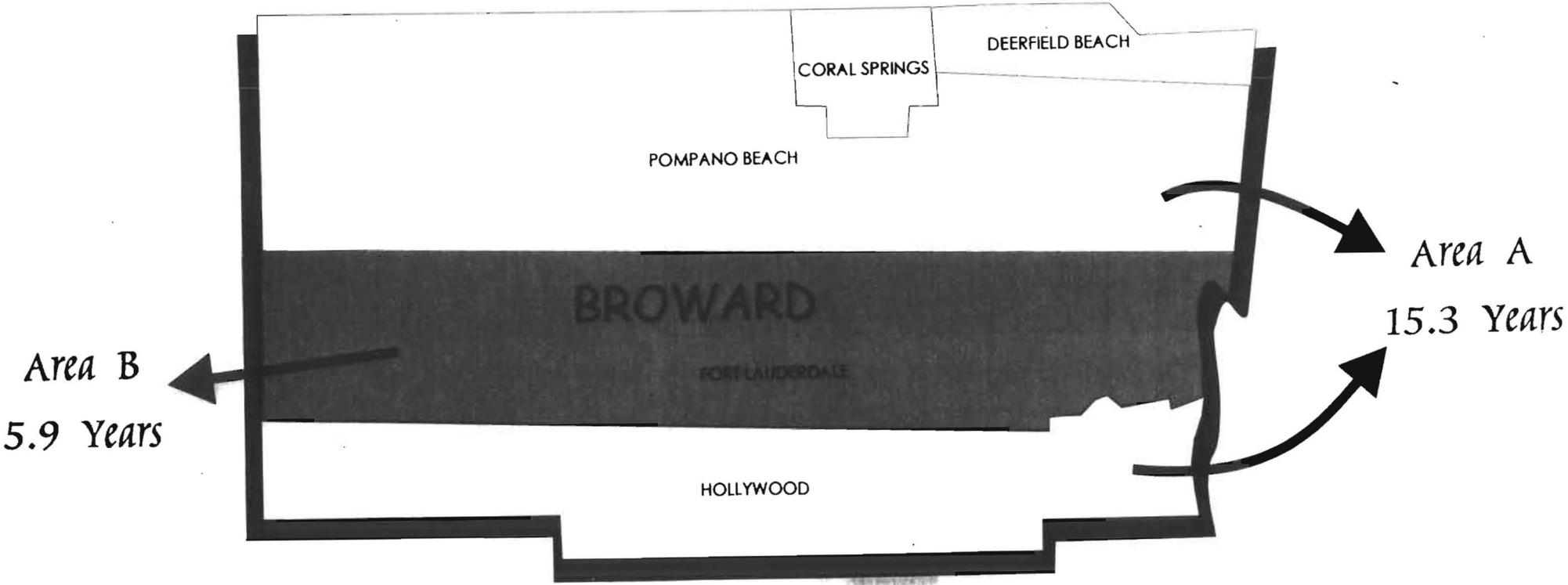


EXHIBIT NO: LF-5

**DOCKETS NOS. : 990455-TL, 990456-TL, 990457-TL, and
990517-TL**

WITNESS: LENNIE FULWOOD

DESCRIPTION:

**Composite exhibit of area code relief plan alternatives for the
904 area code**

904 AREA CODE RELIEF ALTERNATIVES

Alternative #7 is a geographic split relief plan along the coastline (Area A). Area A has an approximate exhaust of 2.3 years. The remaining area (Area B) will have an approximate exhaust of 36.2 years.

Alternative #8 is a combination of overlay and geographic split relief plans which utilizes two new area codes. Portions of Flagler and Volusia Counties (Area C) will get a new area code and have an approximate exhaust of 39 years. The remaining counties (Areas A and B) will utilize two area codes, and have an approximate exhaust of 15.4 years.

Alternative #9 is a combination of spotted overlay and geographic split relief plans, in which overlay occurs in various regions. The shaded areas shown on the map utilize two area codes (Areas A and B). The unshaded area (Area C) utilizes one area code. The approximate exhausts for Areas A and B is 15.5 years, and 36.3 years for Area C.

Alternative #10 is a geographic split boundary extension overlay plan that includes the exchanges predominantly located in Nassau, Duval, and St. Johns Counties (Areas A and B). This area will utilize two area codes and has an approximate life of 10.1 years and the remaining areas would last approximately 10.2 years.

Alternative #11 is an overlay and geographic split relief plan in which the coastline customers (shaded area) utilize two area codes, with an approximate life of 15.5 years. The remaining area utilizes one new area code with an approximate life of 36.2 years.

Alternative #12 is a geographic split boundary extension plan in which the coastline counties (shaded area) would utilize two area codes, and the remaining customers would share the prefixes of the new codes. The approximate lives are 10.0 and 10.6 years, respectively.

Alternative #13 is similar to alternative #12 except that it includes portions of Volusia County. This plan also includes the Debary exchange and a part of the Sanford exchange which are currently part of the 407/321 area code. The approximate exhaust

for the coastline customers is 10 years, and the remaining area will have an approximate exhaust of 10.3 years.

Alternative #14 is a three-way split proposal in which the exchanges predominantly located in Nassau and Duval Counties would utilize one area code (Area A) with an approximate life of 9.5 years. The dark shaded area (Area C) will have an exhaust of 39 years, while Area B (the remaining exchanges) will have an approximate exhaust of 25.4 years. This alternative excludes the Debary exchange and portion of Sanford exchange.

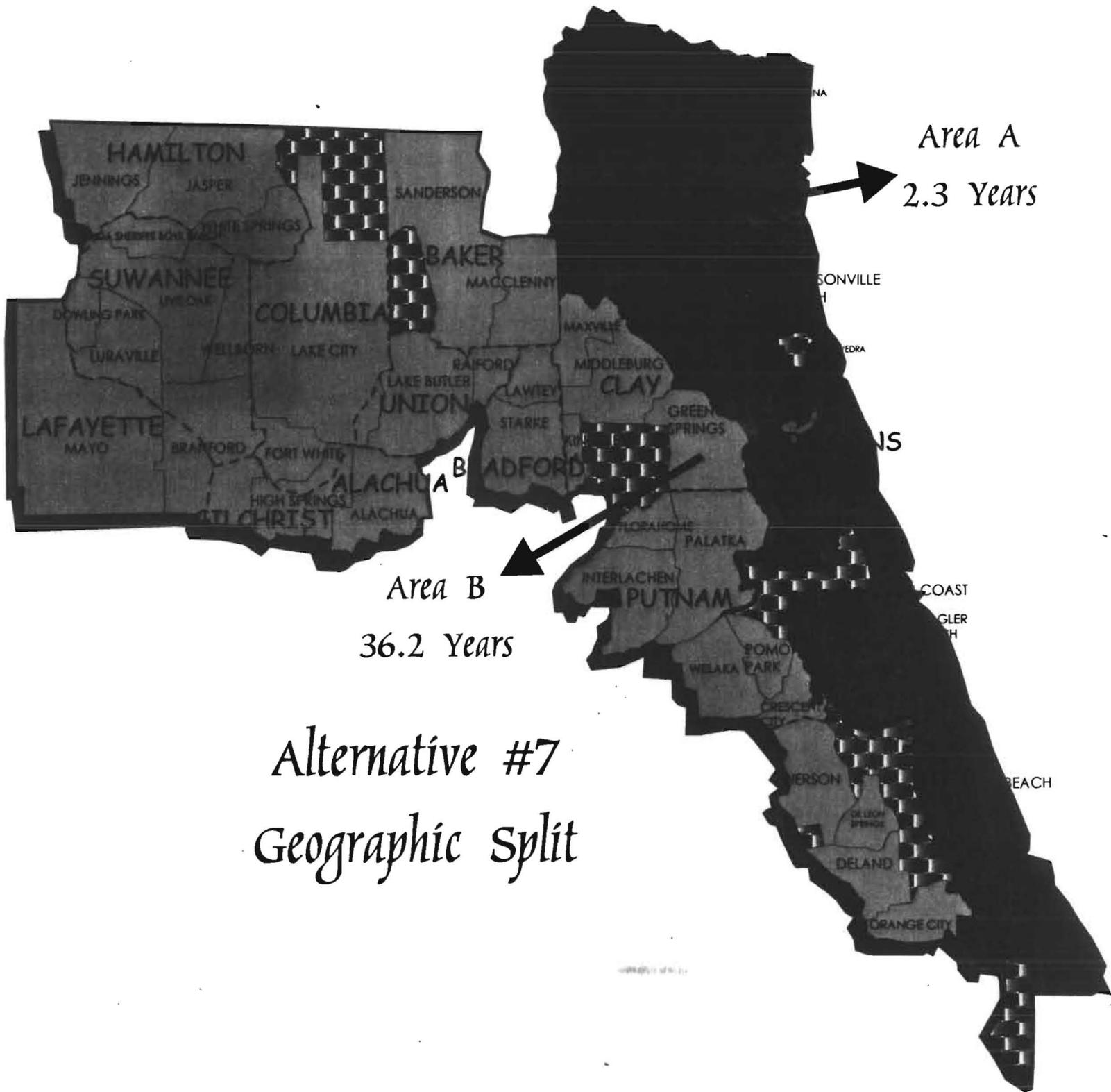
Alternative #15 is similar to Alternative #14; however, this alternative includes the Debary exchange and portions of Sanford exchange. As shown on the map, the approximate exhausts for Areas A and B, B, and C are 9.5, 25.4, and 36.9 years, respectively.

Alternative #16 is a staggered geographic split plan. This plan uses two implementation phases. In the first implementation phase Flagler and Volusia Counties are assigned a new area code with an approximate life of 36.9 years. The remaining counties would retain the 904 area code with an approximate life of 2.7 years.

In the second implementation phase, Flagler and Volusia Counties share their area code with the exchanges predominantly located in Putnam, Hamilton, Suwannee, Lafayette, Gilchrist, Alachua, Union, Bradford, Columbia, and Baker Counties (Area B). The approximate exhaust life of Area B is 14 years. The shaded area (Area A) could have two options. The first option is that they will retain the 904 area with an approximate exhaust life of 3.1 years. The second option is that this area will be overlaid with a new area code that will have an approximate life of 22.4 years.

Alternative #17 is a geographic split plan in which Nassau, Duval, St. Johns Counties, and portions of Clay County (shaded area or Area A) are split. The approximate exhaust life for Area A is 6.9 years, and 14.4 for Area B (unshaded area).

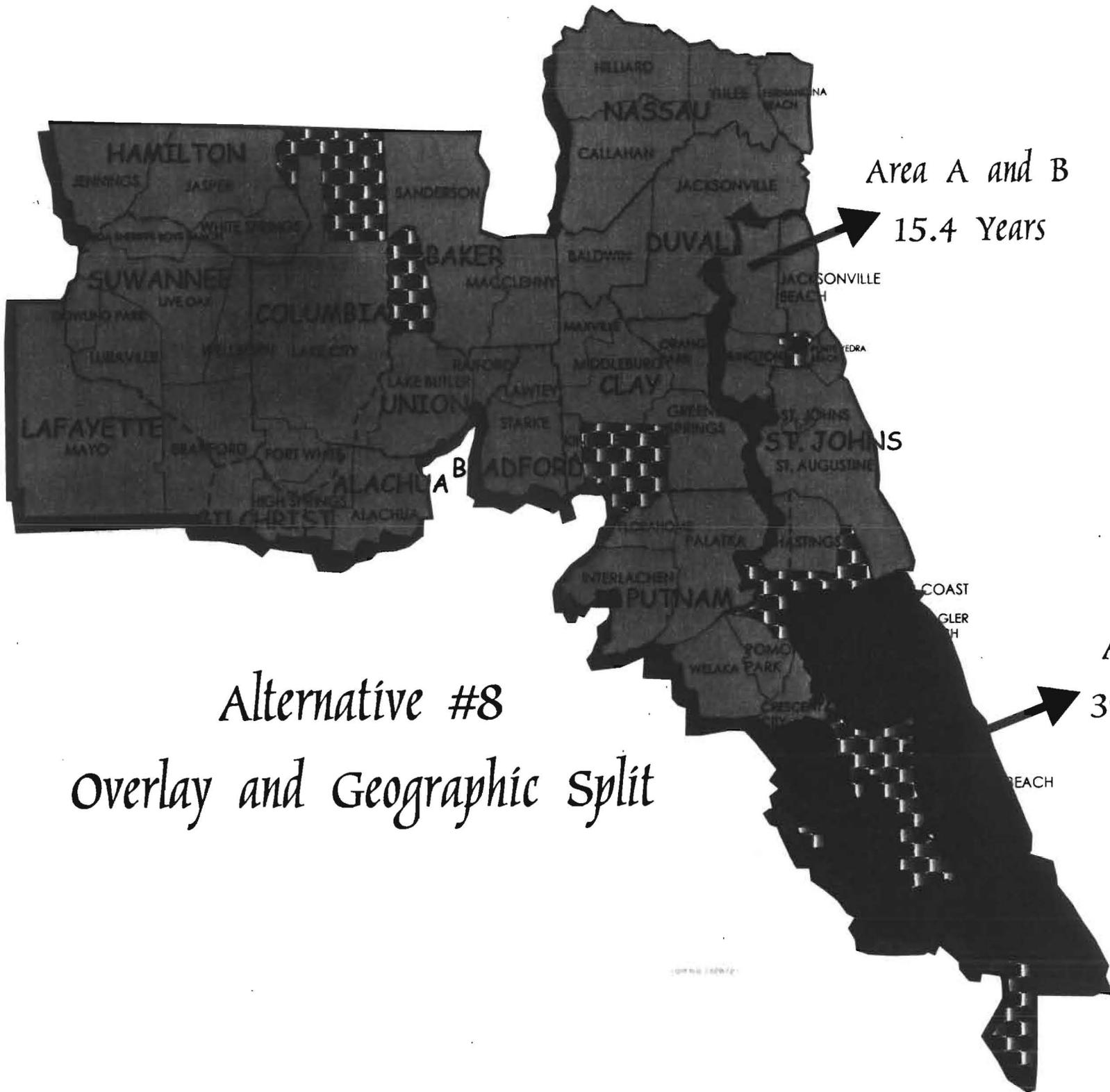
Pages 3 through 14 graphically display these alternatives.



Area A
2.3 Years

Area B
36.2 Years

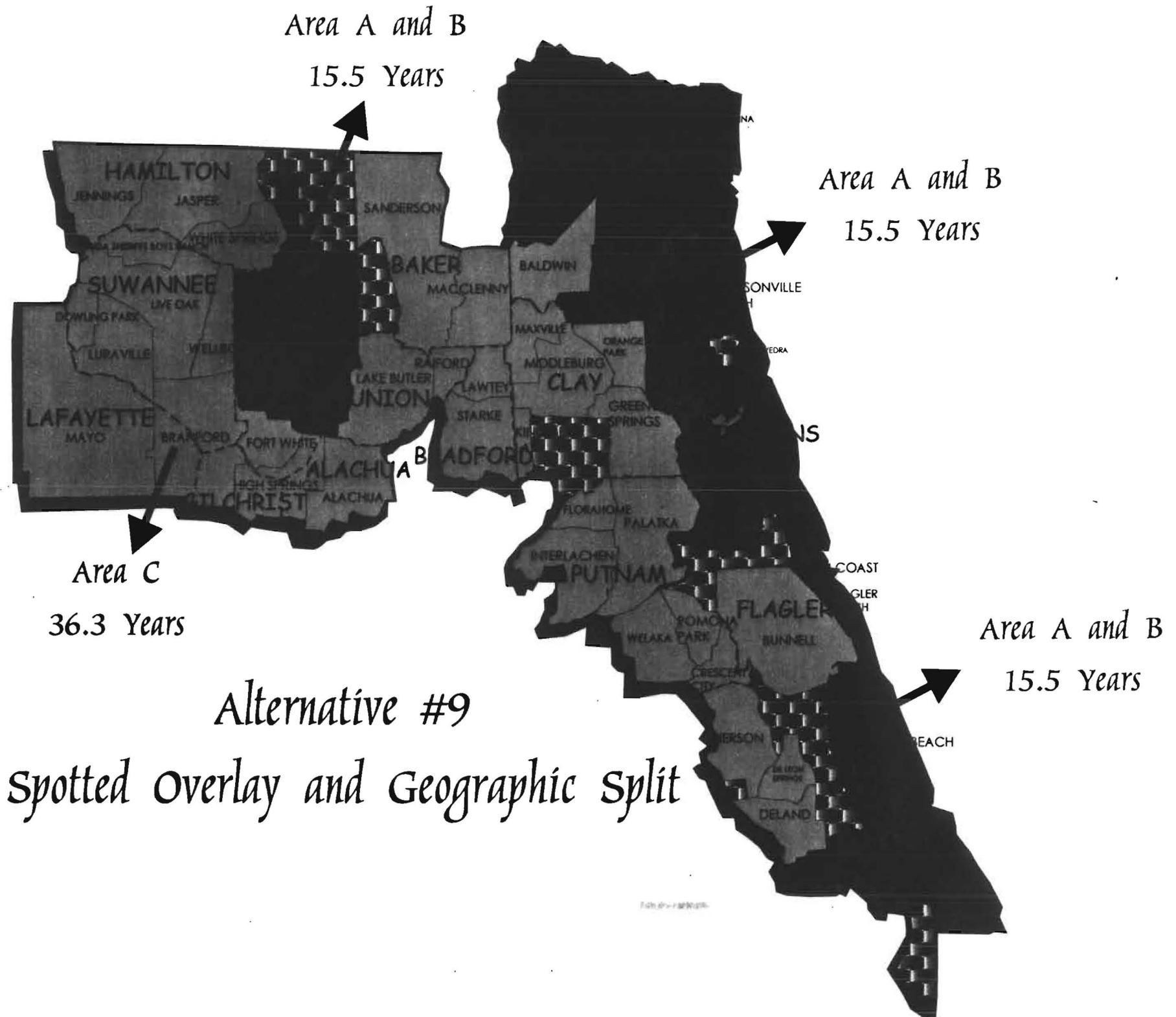
*Alternative #7
Geographic Split*



*Alternative #8
 Overlay and Geographic Split*

*Area A and B
 15.4 Years*

*Area C
 39 Years*



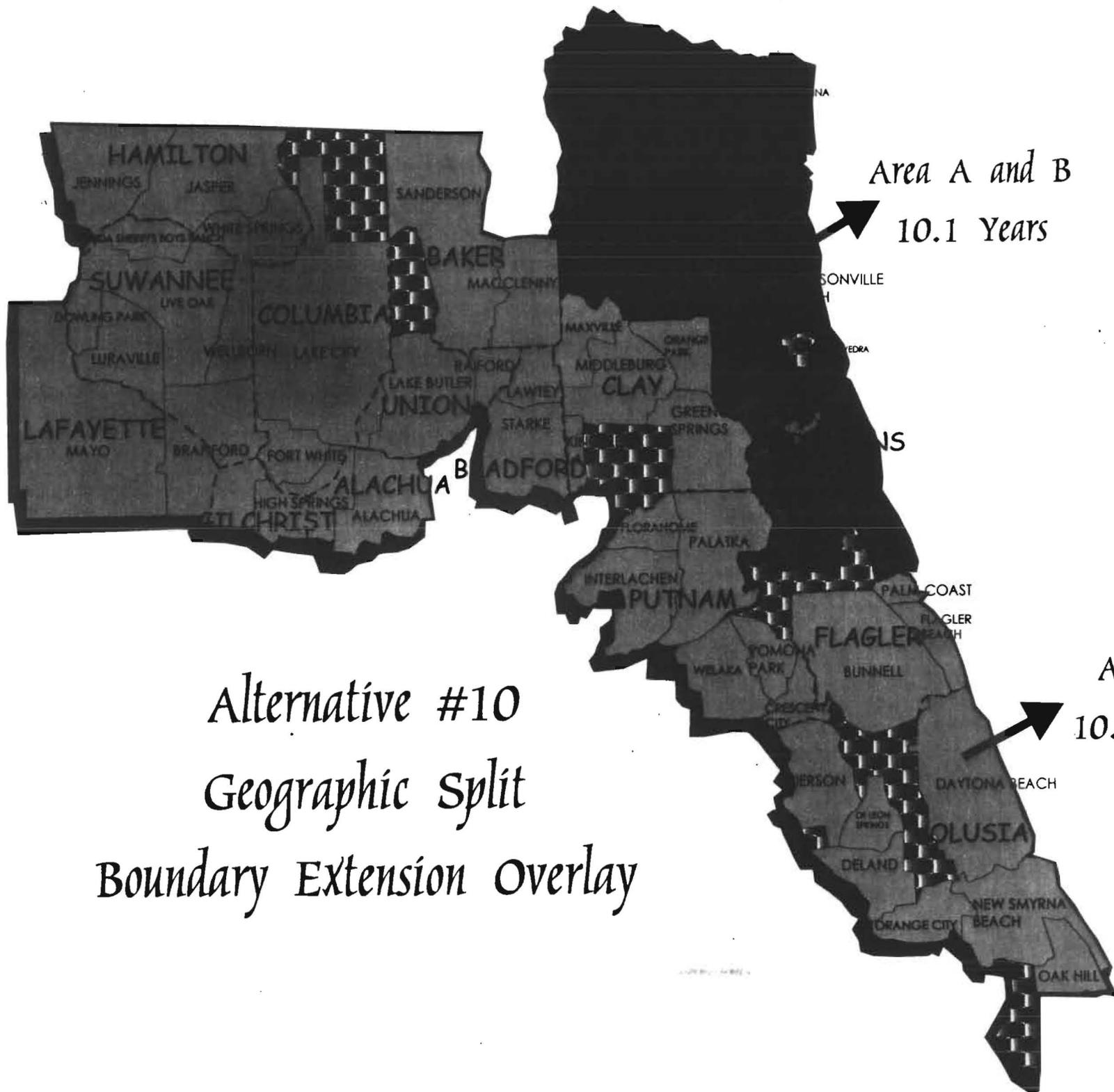
Area A and B
15.5 Years

Area A and B
15.5 Years

Area C
36.3 Years

Area A and B
15.5 Years

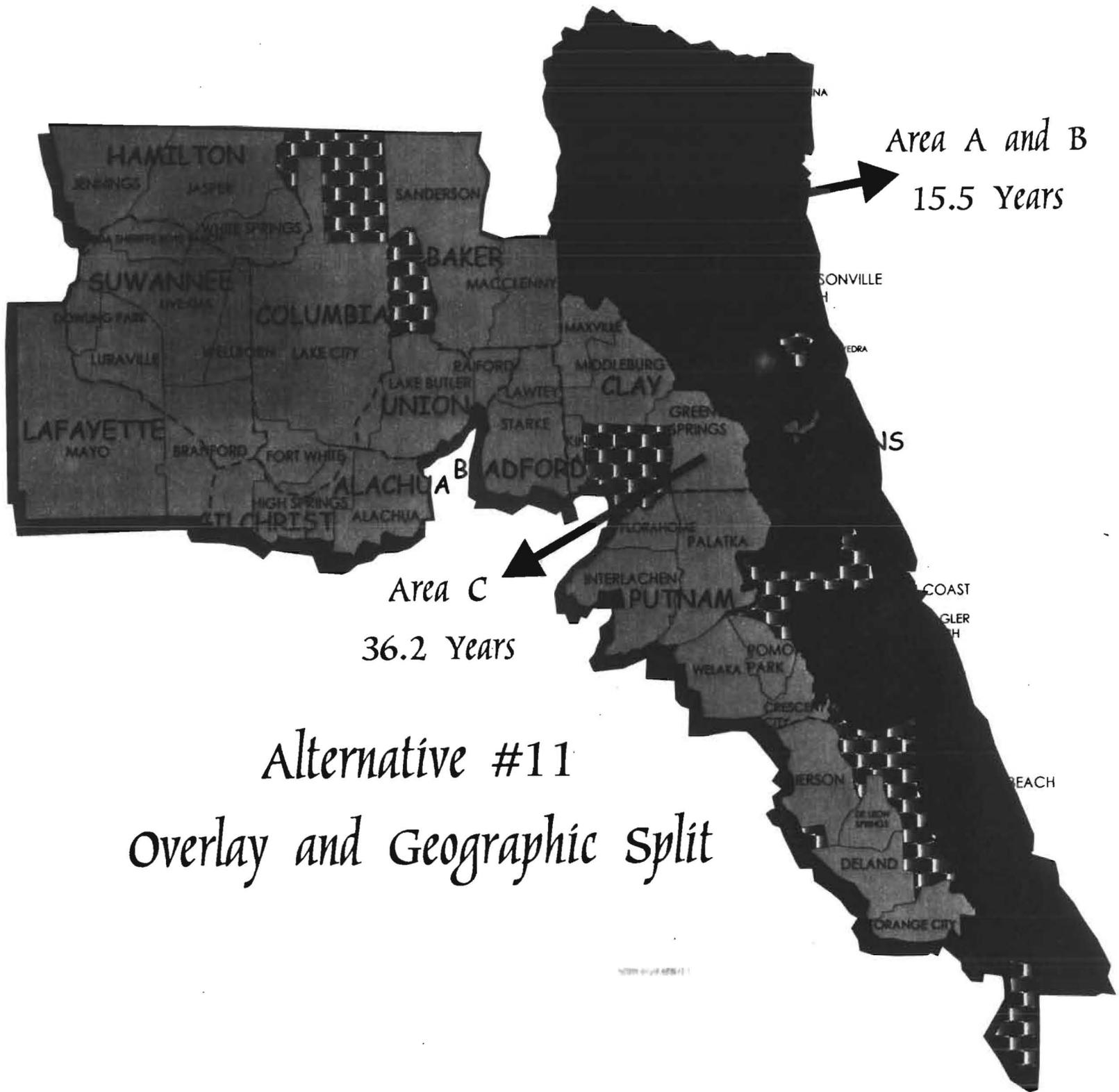
*Alternative #9
Spotted Overlay and Geographic Split*



*Alternative #10
Geographic Split
Boundary Extension Overlay*

*Area A and B
10.1 Years*

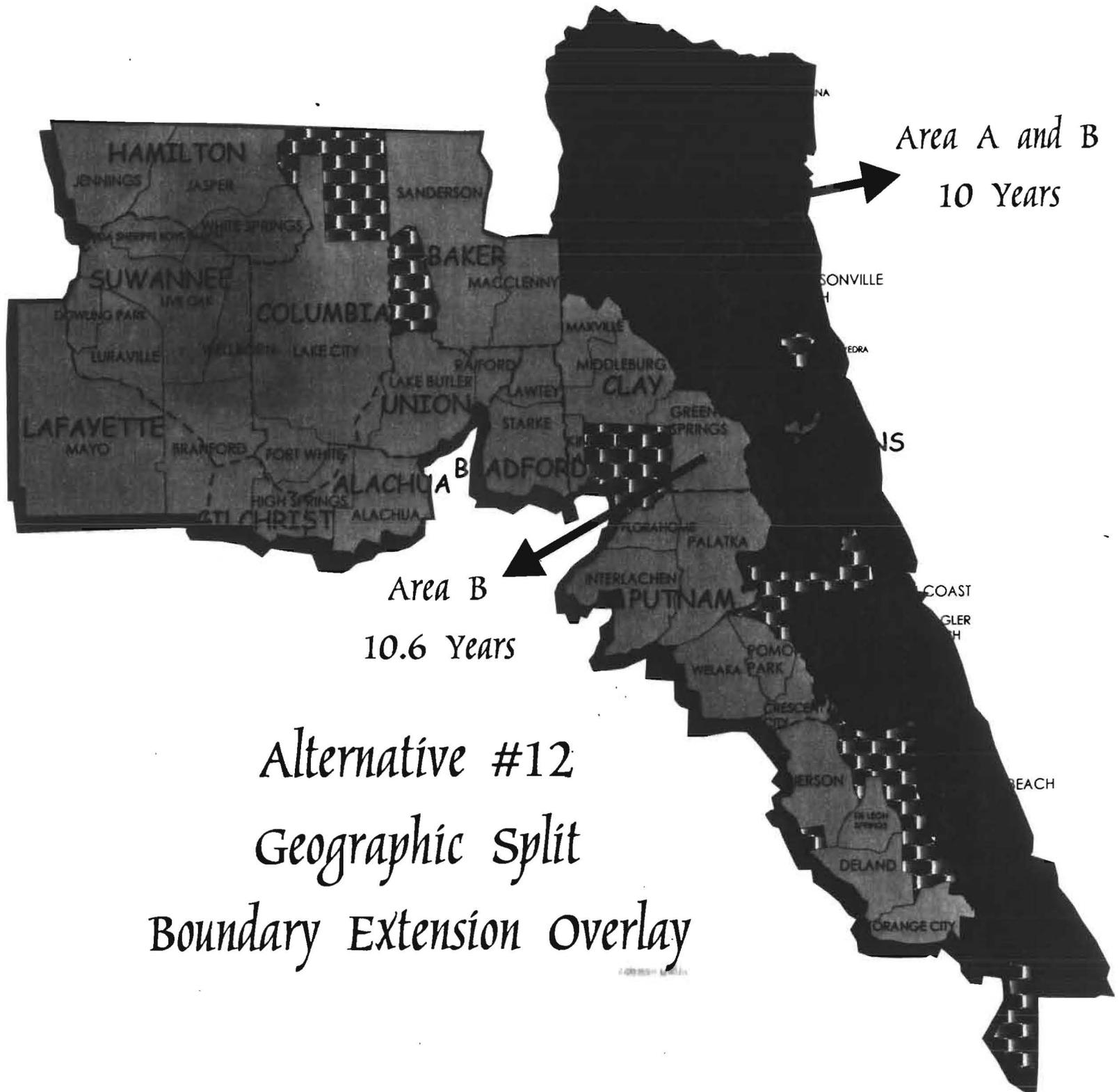
*Area B
10.2 Years*



Area A and B
15.5 Years

Area C
36.2 Years

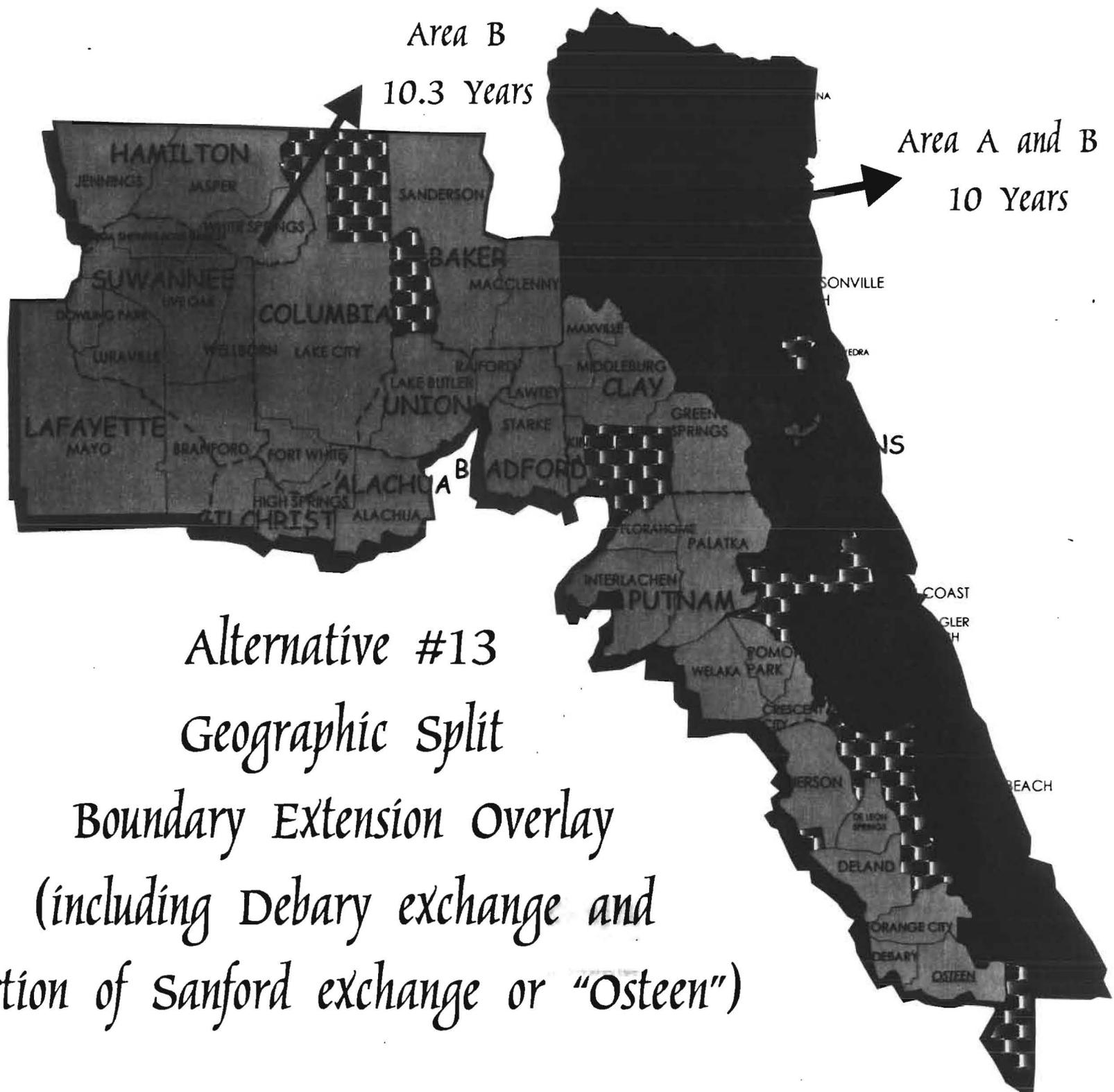
Alternative #11
Overlay and Geographic Split



*Area A and B
10 Years*

*Area B
10.6 Years*

*Alternative #12
Geographic Split
Boundary Extension Overlay*



Area B

10.3 Years

Area A and B

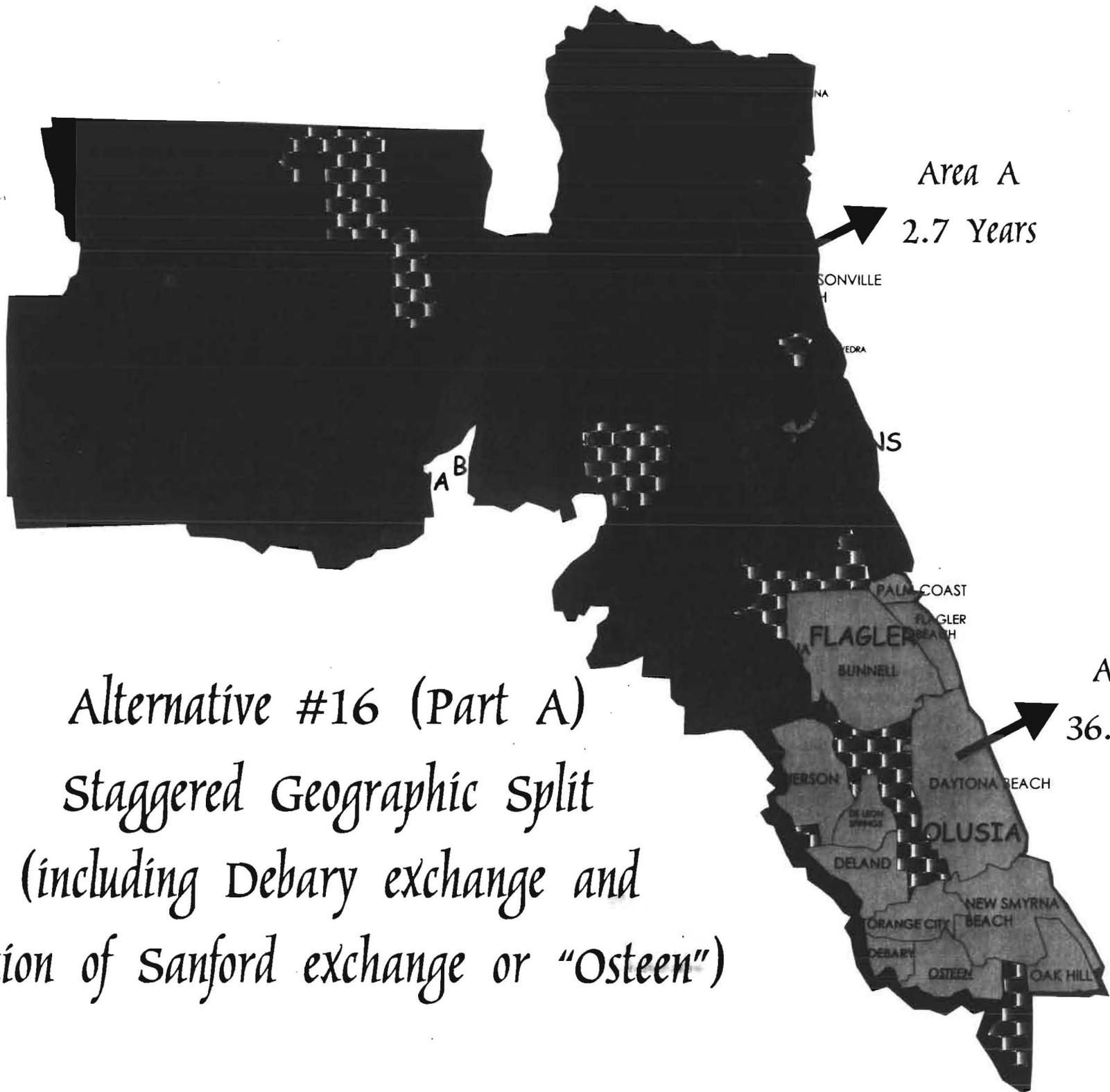
10 Years

Alternative #13

Geographic Split

Boundary Extension Overlay

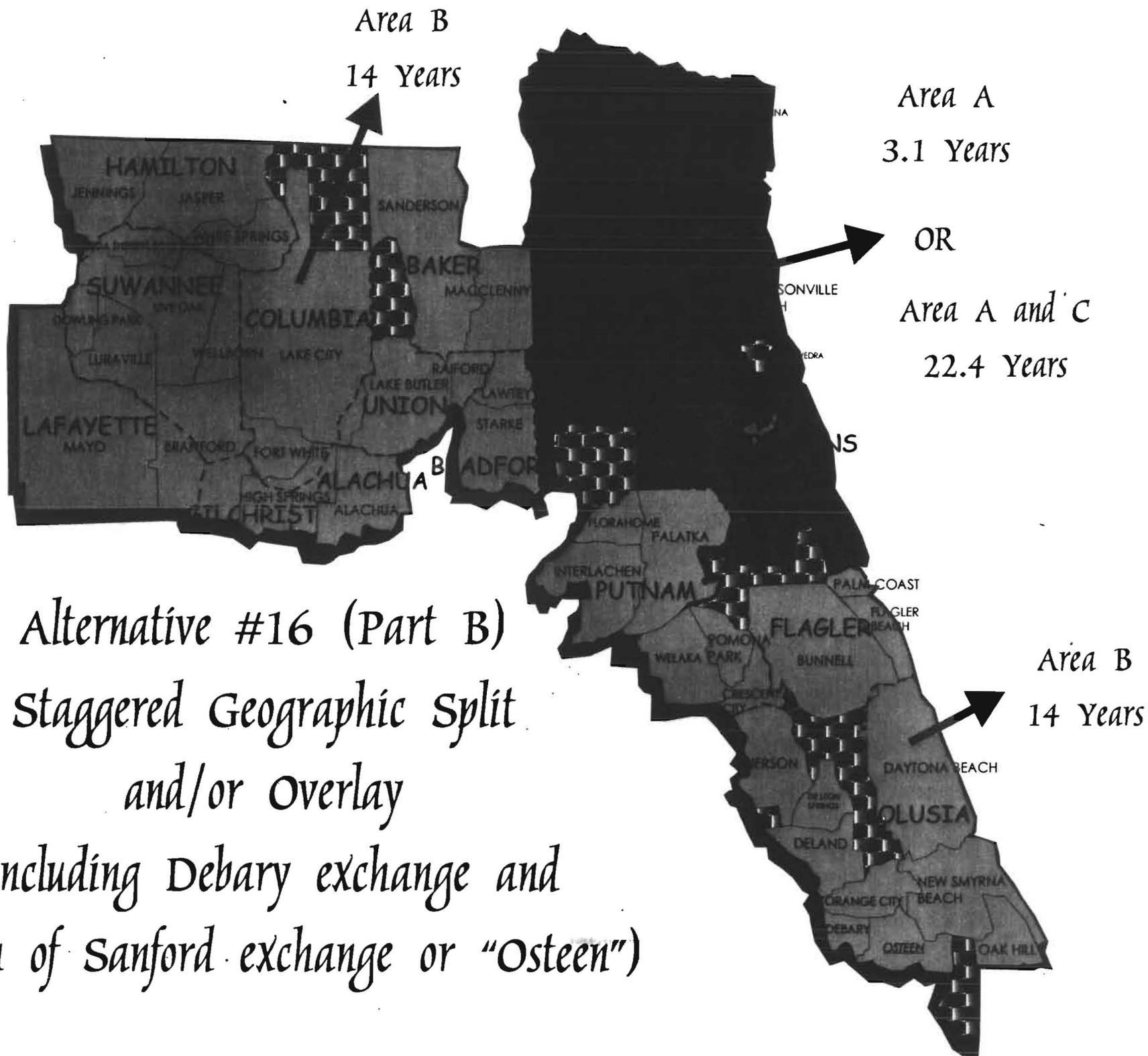
(including Debarry exchange and portion of Sanford exchange or "Osteen")



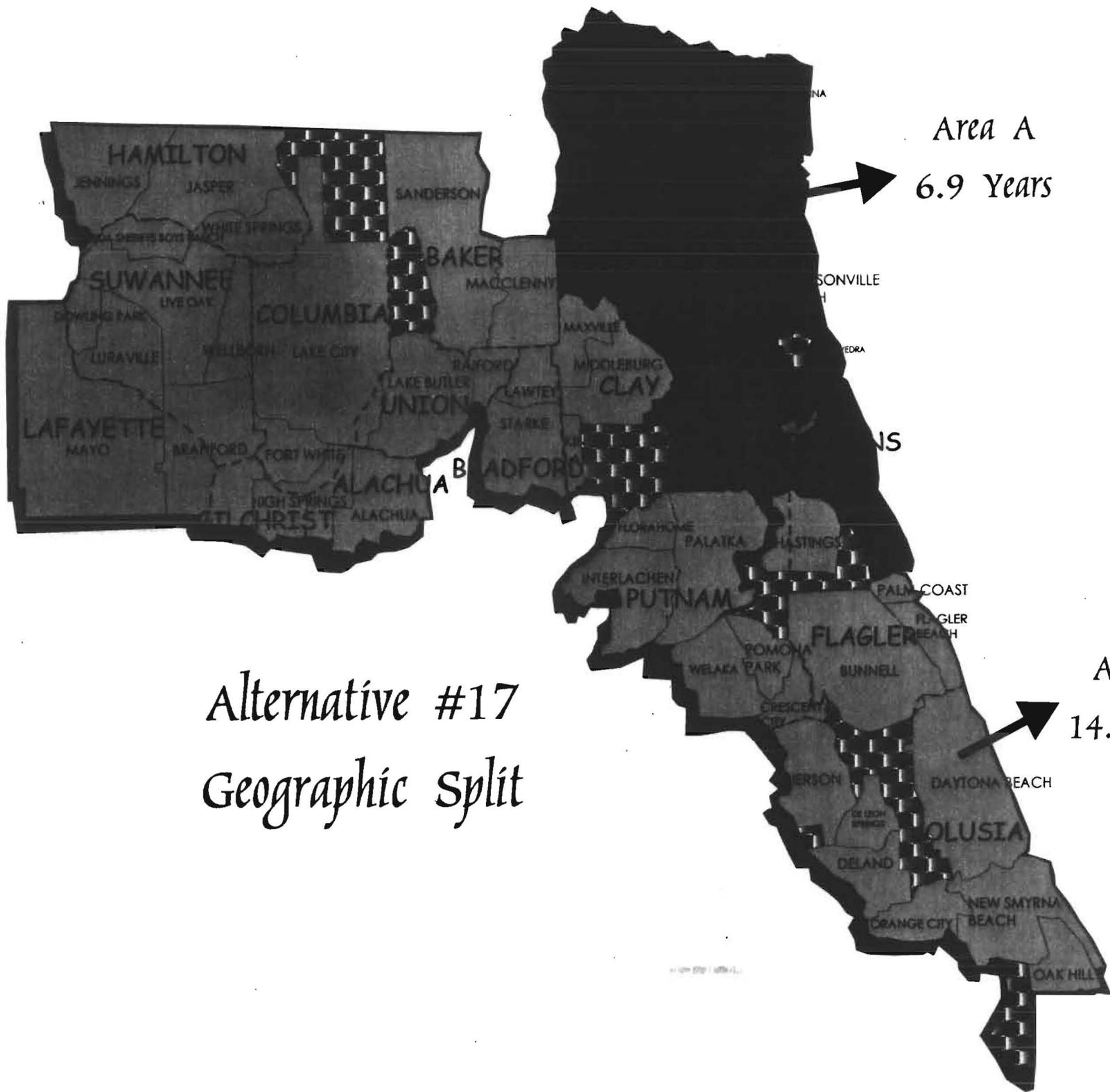
Area A
2.7 Years

Area B
36.9 Years

*Alternative #16 (Part A)
Staggered Geographic Split
(including Debarry exchange and
portion of Sanford exchange or "Osteen")*



*Alternative #16 (Part B)
Staggered Geographic Split
and/or Overlay
(including Debarry exchange and
portion of Sanford exchange or "Osteen")*



Area A
6.9 Years

Area B
14.4 Years

*Alternative #17
Geographic Split*