



## B. WITNESSES

<u>Witness</u>	<u>Issues</u>
Suzanne Brooks (Direct and Rebuttal Testimony; for her Direct Testimony, she shall adopt the prefiled Direct Testimony of Kelley Faul that was previously filed)	1a, 1b, 3, and 4
Gregory J. Darnell (Direct and Rebuttal Testimony)	2a and 2b

## C. EXHIBITS

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
GJD-1	Darnell	Summary of academic and professional qualifications

## D. BASIC POSITION

MCI WorldCom generally supports geographic splits as the most pro-competitive method of area code relief since it does not require 10 digit local dialing and a split does not introduce potential infirmities to the development of an effectively competitive market. Thus, in the 561 NPA, MCI WorldCom supports a geographic split. However, there are circumstances where a geographic split may not be appropriate, such as where rate centers or exchanges would be split, a county would be split, or very unequal projected relief lives would result. Accordingly, MCI WorldCom is recommending the consensus relief plans for the 305/786 and 954 NPAs, which propose overlay relief plans. MCI WorldCom has not intervened in the 904 NPA relief docket.

## E. ISSUES AND POSITIONS

**1a. Should the Commission approve the industry's consensus relief plans for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

MCI WorldCom's Position:

- A. In the 305/786 NPAs, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an expanded overlay.
- B. In the 561 NPA, the Commission should reject the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay and instead adopt one of the geographic splits (Alternatives #2, #3, or #4).
- C. In the 954 NPA, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay.
- D. In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.

**1b. If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:**

- A) 305/786
- B) 561

- C) 954
- D) 904

MCI WorldCom's Position:

- A. In the 305/786 NPAs, there is no other reasonable alternative.
- B. In the 561 NPA, any one of the geographic splits (Alternatives #2, #3, or #4) would be appropriate.
- C. In the 954 NPA, there is no other reasonable alternative.
- D. In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.

**2a. What number conservation measure(s), if any, should be implemented for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

MCI WorldCom's Position: The Commission should address all number conservation measures in Docket No. 981444-TP, consistent with the policies and rules recently set forth in FCC Order No. 00-104, released March 31, 2000. Such measures should immediately include adoption of the Revised Plan for number pooling submitted in Docket No. 981444-TP on April 13, 2000 (as amended) and implementation of the non-protested provisions of FPSC Order No. PSC-00-0543-

PAA-TP, issued March 16, 2000. Also in Docket No. 981444-TP, the Commission should continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC consistent with FCC Order 00-104.

**2b. If the conservation measures are to be implemented, when should they be implemented?**

- A) 305/786
- B) 561
- C) 954
- D) 904

MCI WorldCom's Position: Number pooling should be implemented pursuant to the implementation schedule and requirements contained within the Revised Plan (as amended) for number pooling submitted on April 13, 2000, in Docket No. 981444-TP. The non-protested provisions of the FPSC Order No. PSC-00-0543-PAA-TP should continue to be implemented now. The remaining number conservation measures should be worked on through the process previously agreed to for Docket No. 981444-TP.

**3. What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

- A) 305/786
- B) 561
- C) 954

**D) 904**

MCI WorldCom's Position: Dialing patterns for local, toll, EAS, and ECS calls generally should be the same today as they are after relief is implemented, with two exceptions. In the case of an overlay, all calls must be placed using the area code, even if the area codes of the originating and terminating calls are the same. In the case of a geographic split, the area code must also be dialed when calls are placed across NPA boundaries.

**4. What is the appropriate relief plan implementation schedule for the following area codes:**

**A) 305/786**

**B) 561**

**C) 954**

**D) 904**

MCI WorldCom's Position: Each relief plan should be implemented as stated in the industry recommendation, including a staggered implementation of three months between each NPA relief plan. These implementation schedules should be prioritized by exhaust dates, but in no event should the implementation schedule be set in a manner where the NPA would be exhausted before the relief plan is fully implemented.

#### **F. PENDING MOTIONS**

MCI WorldCom, Inc., and its operating subsidiaries do not have any currently pending motions.

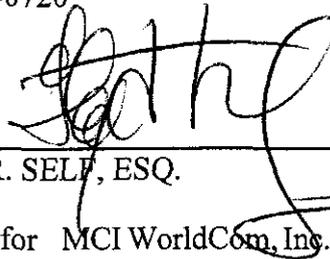
**G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH**

MCI WorldCom, Inc., and its operating subsidiaries know of no requirements that cannot be complied with.

Dated this 21st day of April, 2000.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720



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FLOYD R. SELF, ESQ.

Attorneys for MCI WorldCom, Inc., and its operating subsidiaries

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of MCI WorldCom, Inc. and its operating subsidiaries in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL has been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 21st day of April, 2000.

Beth Keating, Esq.\*  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Lee Fordham, Esq.\*  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Tim Vaccaro, Esq.\*  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Donna Clemons, Esq.\*  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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

Angela Green, Esq.  
Florida Public Telecommunications  
Association  
125 S. Gadsden St., Suite 200  
Tallahassee, FL 32301

Charles J. Rehwinkel  
Susan Masterton  
F. Ben Poag  
Sprint-Florida, Incorporated  
MC FLTHO0107  
P.O. Box 2214  
Tallahassee, FL 32399-2214

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Telecommunications Association, Inc.  
310 North Monroe St.  
Tallahassee, FL 32301

Donna McNulty, Esq.  
MCI WorldCom  
The Atrium Building, Suite 105  
325 John Knox Road  
Tallahassee, FL 32303

Mr. Richard H. Brashear  
ALLTEL Florida, Inc.  
206 White Avenue, S.E.  
Live Oak, FL 32060-3357

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

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

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

Bruce May, Esq.  
Holland & Knight  
P.O. Drawer 810  
Tallahassee, FL 32302

Mr. Bob Koslow  
News-Journal Corp.  
Southwest Volusia Bureau  
1107 Saxon Blvd.  
Orange City, FL 32763

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

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

J. Jeffry Wahlen  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302

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

Peter M. Dunbar, Esq.  
Pennington, Moore, Wilkinson, Bell &  
Dunbar, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302-2095

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, TN 37069

Marsha Rule, Esq.  
Tracy Hatch, Esq.  
AT&T  
101 N. Monroe St., Suite 700  
Tallahassee, FL 32301

Kenneth A. Hoffman, Esq.  
John R. Ellis, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302

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

Omnipoint Communications  
600 Ansin Blvd.  
Hallandale, FL 33009

Kimberly D. Wheeler  
Morrison & Foerster Law Firm  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006-1888

Joe Assenzo  
Sprint PSC  
Legal Department  
49000 Main Street, 11th Floor  
Kansas City, MO 64112

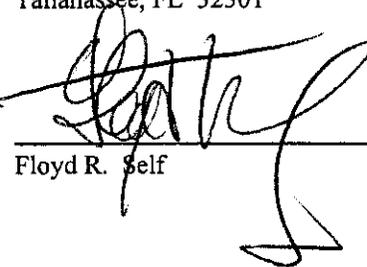
Mr. Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Gloria Johnson  
Associate General Counsel  
BellSouth Cellular Corp.  
1100 Peachtree Street, N.E., Suite 910  
Atlanta, GA 30309-4599

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

Charles Beck, Esq.  
Office of Public Counsel  
111 West Madison St., Room 812  
Tallahassee, FL 32399-1400

Daniel H. Thompson  
Berger Davis & Singerman  
215 S. Monroe St., Suite 705  
Tallahassee, FL 32301



Floyd R. Self