

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**

2 A. My name is Suzanne Brooks and my business address is 701 Fifth Avenue, Suite
3 500, Seattle Washington 98104.

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. The purpose of my rebuttal testimony is to address the statements filed in the
6 direct testimony of Daniel Baeza on behalf of BellSouth and Richard Guepe on
7 behalf of AT&T on November 17, 1999, in this proceeding.

8 **Q. WHAT HAS BELLSOUTH AND AT&T PROPOSED IN THIS**
9 **PROCEEDING?**

10 A. BellSouth and AT&T believe that the industry consensus relief plan for each NPA
11 represents the best means of relief, and each should be adopted.

12 **Q. DO YOU AGREE WITH THIS PROPOSAL?**

13 A. In Part, MCI WorldCom agrees with the industry consensus that was reached for
14 NPAs 305/786 and believes that there is no other reasonable alternative to the
15 industry's proposed expanded overlay proposal.

16 MCI WorldCom also agrees with the industry consensus to relieve the
17 exhausting NPA 954 via an overlay.

18 However MCI WorldCom does not agree with the industry consensus that
19 was reached for NPA 561. MCI WorldCom advocates a split because it would
20 preserve 7-digit dialing for customers within their home NPAs and would also
21 best serve a competitive local exchange services market. Unlike the above
22 recommendations, there are no special circumstances in the 561 NPA that

1 warrants implementing an overlay. Thus, MCI WorldCom disagrees with the
2 industry proposed over and believes a geographic split is the most appropriate,
3 competitively neutral method of relief for the 561 NPA.

4 MCI WorldCom did not intervene in Docket 990517-TL and has no
5 opinion for relief of NPA 904.

6 **Q. DOES MCI WORLDCOM HAVE A RECOMMENDED SPLIT**
7 **ALTERNATIVE FOR NPA 561?**

8 A. MCI WorldCom can support the recommendation made by AT&T that split
9 Alternative 2 with Area A retaining 561.

10 **Q. DOES MCI WORLDCOM HAVE ANY OTHER CONCERNS WITH THE**
11 **PROPOSALS MADE BY EITHER BELLSOUTH OR AT&T?**

12 A. Yes, AT&T suggests that in the event the Commission decides that it will not
13 adopt the consensus relief plans that any geographic split include the caveat that
14 wireless carriers be allowed to "grandfather" existing numbers.

15 **Q. DO YOU AGREE WITH AT&T'S PROPOSAL.**

16 A. No. One segment of the industry, wireless carriers (and their customers) should
17 not be exempted from the burden and associated costs of an area code change.
18 Additionally, any assumptions for the projected life of the alternative splits do not
19 take into consideration the "grandfathering" of wireless numbers, which could
20 have a significant impact to those projections.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Rebuttal Testimony of Suzanne Brooks on behalf 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

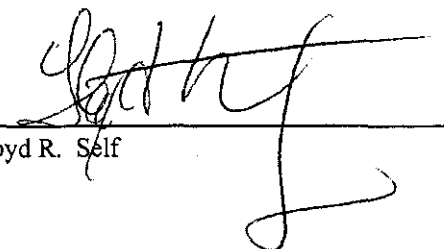
Mr. Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

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