



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

2       A.     My name is Greg Darnell, and my business address is 6 Concourse Parkway, Suite

3             3200, Atlanta, Georgia, 30328.

4       **Q.     ARE YOU THE SAME GREG DARNELL THAT FILED DIRECT**

5             **TESTIMONY IN THE ABOVE CAPTIONED PROCEEDING ON**

6             **NOVEMBER 17, 1999?**

7       A.     Yes.

8       **Q.     WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

9       A.     The purpose of this rebuttal testimony is respond to the direct testimony of the

10            other parties in this docket concerning number conservation measures and the

11            recent FCC and FPSC orders.

12       **Q.     WHAT WAS SAID IN THE DIRECT TESTIMONY WITH REGARD TO**

13            **NUMBER CONSERVATION MEASURES?**

14       A.     Mr. Guepe of AT&T recommended, for example, that “In the event the industry

15            and Commission are unable to develop and implement number conservation

16            measures in Docket No. 98144-TP [sic], then the Commission should move

17            forward with rate center consolidation, 1000s number block management, and

18            number pooling for LNP-capable carriers.” Mr. Guepe further recommended that

19            the “Number pooling for LNP capable carriers should be implemented consistent

20            with the FCC’s guidelines, preferably pursuant to a national schedule.”

21       **Q.     WHAT IS MCI WORLDCOM’S POSITION ON NUMBER**

22            **CONSERVATION MEASURES?**

1 A. MCI WorldCom agrees that number conservation measures should be handled in  
2 one docket . MCI WorldCom also agrees that the most preferable situation would  
3 be to implement number pooling pursuant to a national schedule and FCC  
4 guidelines. However, this national schedule has yet to materialize.

5 **Q. WHAT HAS BEEN DONE BY THE INDUSTRY AND THE COMMISSION**  
6 **IN THE FIVE MONTHS SINCE THE FILING OF DIRECT TESTIMONY**  
7 **IN THIS PROCEEDING TO ADDRESS NUMBER CONSERVATION**  
8 **MEASURES?**

9 A. The Commission established a number of committees to address specific number  
10 conservation issues. I participated on the Number Pooling committee. These  
11 committees met in an effort to evaluate each identified number conservation  
12 method and prepare an implementation plan if warranted. However, prior to the  
13 completion of the number pooling committee's evaluation, the Commission  
14 issued an Order on March 16, 2000, directing carriers to implement number  
15 pooling in NPA 954 by May 1, 2000, in NPA 561 by July 1, 2000, and in 904  
16 NPA by October 1, 2000.<sup>1</sup> On March 23, 2000, a Number Pooling  
17 Implementation Plan was filed for the 954, 561, and 904 NPAs by many Florida  
18 code holders. In this document the signatory code holders provided to the  
19 Commission an alternative number pooling plan for the 954, 561, and 904 NPAs  
20 that they believed provided the overall best means of achieving meaningful

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21 <sup>1</sup> Florida Public Service Commission, Order No. PSC-00-0543-PAA-TP ("PAA  
22 Order")

1 number pooling in these three NPAs. On March 31, 2000, the Federal  
2 Communications Commission (“FCC”) issued its Order No. FCC 00-104, the  
3 Report and Order and Further Notice of Proposed Rulemaking in the Number  
4 Resource Optimization proceeding, CC Docket No. 99-200 (“Order 00-104”).  
5 Order 00-104 addresses new rules to govern the allocation of telephone number  
6 resources to carriers and specific requirements for the start of national thousands-  
7 blocks number pooling. On April 6, 2000, a group of Florida carriers filed their  
8 Joint Petition on Mandatory Number Pooling Order to protest the number pooling  
9 sections of the Commission’s PAA Order. On April 11, 2000, these carriers filed  
10 the Joint Petitioners’ Offer of Settlement to Resolve the Number Pooling  
11 Implementation Protest of Order No. PSC-00-0543-PAA-TP in an attempt to  
12 resolve the PAA Order protest without further litigation.

13 **Q. WHAT IS MCI WORLDCOM’S POSITION ON THE OFFER OF**  
14 **SETTLEMENT FILED BY THE JOINT PETITIONERS ON APRIL 11,**  
15 **2000 IN DOCKET NO. 981444-TP?**

16 A. MCI WorldCom fully supports the Offer of Settlement filed by the Joint  
17 Petitioners on April 11, 2000, in Docket 981444-TP, as amended.

18 **Q. WHAT IMPACT DOES THE OFFER OF SETTLEMENT FILED IN**  
19 **DOCKET 981444-TP HAVE ON NUMBER CONSERVATION MEASURES**  
20 **BEFORE THIS COMMISSION IN THIS DOCKET?**

21 A. The Offer of Settlement filed in Docket 981444-TP, if accepted, would permit  
22 thousands-block number pooling to begin at the earliest possible date. The Joint

1           Petitioners only protested the number pooling portions of the PAA Order and, as  
2           such, the other number conservation measures contained in the PAA Order have  
3           already been resolved.

4           **Q.   WHAT NUMBER CONSERVATION MEASURES HAVE NOT BEEN**  
5           **RESOLVED BY THE COMMISSION?**

6           A.   There are two items that the Commission still needs to address. These two items  
7           are Number Pooling Cost recovery and Rate Center Consolidation (“RCC”).

8           **Q.   HOW SHOULD COST RECOVERY BE ADDRESSED?**

9           A.   The Commission should promptly open a docket for the purpose of determining  
10           the costs of numbering pooling and the method by which those costs should be  
11           recovered.

12           **Q.   HOW SHOULD RATE CENTER CONSOLIDATION BE ADDRESSED?**

13           A.   The Commission should re-establish its Rate Center Consolidation committee to  
14           evaluate whether or not Rate Center Consolidation is feasible in any of the local  
15           calling areas in Florida.

16           **Q.   WHY SHOULD THE COMMISSION RE-ESTABLISH ITS RATE**  
17           **CENTER CONSOLIDATION COMMITTEE TO EVALUATE WHETHER**  
18           **OR NOT RCC IS FEASIBLE IN ANY OF THE LOCAL CALLING AREAS**  
19           **IN FLORIDA?**

20           A.   While RCC has the potential in some local calling areas to yield significant  
21           numbering efficiencies, it is also a very complex matter to address and implement.  
22           For example, Atlanta, Georgia is a prime candidate for RCC. It has 58 rate

1 centers in one local calling area and 33 rate centers can be merged into one rate  
2 center without impacting any local or toll calling rates. In this unique and  
3 relatively simple situation,<sup>2</sup> the industry has been meeting for about one year in  
4 an effort to design a workable implementation plan for RCC in Atlanta. The  
5 current proposed implementation plan would take about 18 months from start to  
6 finish. One of the primary concerns is 911 calling. If RCC is not done correctly,  
7 911 calls might be misrouted and no one wants that to occur.

8 **Q. SHOULD THE COMMISSION ACCEPT THE OFFER OF SETTLEMENT**  
9 **FILED IN DOCKET 981444-TP AS RESOLUTION OF NUMBER**  
10 **POOLING ISSUES FILED IN THIS DOCKET?**

11 A. Yes.

12 **Q. WHY SHOULD THE COMMISSION ACCEPT THE OFFER OF**  
13 **SETTLEMENT FILED IN DOCKET NO. 981444-TP AS RESOLUTION**  
14 **OF NUMBER POOLING ISSUES?**

15 A. Because it provides a rational and feasible method to implement thousands-block  
16 number pooling at the earliest possible date without unnecessarily jeopardizing  
17 network reliability.

18 **Q. DOES THIS CONCLUDE YOUR PREFILED REBUTTAL TESTIMONY?**

19 A. Yes.

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20 <sup>2</sup> Atlanta is the largest local calling area in the United States. This situation  
21 would not exist in Florida.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Rebuttal Testimony of Gregory J. Darnell 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.

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