

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

2 A. I am Richard Guepe, and my business address is 1200 Peachtree Street, N.E.,
3 Atlanta, Georgia 30309.

4 **Q. ARE YOU THE SAME RICHARD GUEPE THAT FILED DIRECT**
5 **TESTIMONY IN THIS CASE?**

6 A. Yes, I am.

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

8 A. The purpose of my rebuttal testimony is to tentatively respond to the additional
9 NPA relief alternatives that have been developed subsequent to the filing of my
10 direct testimony and which were distributed at the April 6 Staff workshop in these
11 dockets. It is my understanding that the Commission Staff will be filing
12 testimony in support of these additional alternative relief plans and that the parties
13 will have an opportunity to specifically respond to such testimony. However, at
14 this time I wish to provide a few comments regarding these additional plans. In
15 addition, I wish to respond further to the number conservation issue.

16 **Q. WHAT ARE YOUR CONCLUSIONS AFTER REVIEWING THE**
17 **ADDITIONAL RELIEF PLANS?**

18 A. The additional NPA relief alternatives presented in the Staff document do not
19 appear to provide any better alternatives than the consensus alternatives that are
20 being proposed by the industry (and which are indicated as "Alternative #1" for
21 each of the NPAs being examined in this proceeding). For example, the
22 additional 954 alternatives for Broward County strike me as especially

1 inappropriate because the county either ends up with the Ft. Lauderdale exchange
2 being carved out of the middle of the county on a geographic split (Alternative #4)
3 or Ft. Lauderdale is carved out and an overlay is imposed (Alternative #3). Either
4 of these plans would still require some degree of 10 digit local dialing, but not
5 uniformly throughout the county, and the projected lives of the relief are uneven.

6 **Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING THE**
7 **ADDITIONAL AREA CODE RELIEF ALTERNATIVES NOW BEING**
8 **PROPOSED?**

9 A. The new alternatives for the other geographic areas appear to generally provide
10 additional county or community of interest divisions that are inappropriate or they
11 result in unbalanced relief lives. However, without the benefit of the backup
12 information to these alternatives, I must at this time reserve any further comments
13 for my later rebuttal.

14 **Q. WHAT ADDITIONAL RESPONSES DO YOU HAVE REGARDING THE**
15 **TESTIMONY ON THE NUMBER CONSERVATION ISSUE?**

16 A. In general, I support the testimony of the other carriers regarding the number
17 conservation measures they identify, but with the caveat that any measures
18 adopted in Florida must now be in compliance with the FCC's recent Order No.
19 00-104, issued March 31, 2000, in FCC Docket No. CC 99-200.

20 As for specific measures, the return of unused and reserved NXX codes
21 that are older than six months (or 9 months if extensions were granted) represents
22 a fairly immediate benefit that is consistent with this Commission's order, the

1 FCC's Order 00-104, and good business sense. For example, AT&T, has returned
2 or is in the process of returning approximately 20 NPA-NXX codes in Florida.
3 Finally, in the area of number pooling, while a good case can be made to
4 implement number pooling pursuant to any area code relief plan, this
5 Commission's first number pooling should occur pursuant to the number pooling
6 Revised Plan of the Florida code holders that was filed in Docket No. 981444-TP
7 on April 11, 2000, and amended on April 17, 2000. Adoption of the Revised Plan
8 would efficiently and comprehensively implement number pooling in Florida in
9 the 954, 561, and 904 area codes and should help to extend the life of these
10 existing numbering resources in these areas.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 **A. Yes.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Rebuttal Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. 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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