



# County of Volusia

ORIGINAL

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April 20, 2000

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MAIL ROOM  
SERVICES DIVISION

**VIA FEDERAL EXPRESS**

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No.: 990517-TL**

Dear Mrs. Bayo:

Enclosed please find an original and fifteen (15) copies of each of the following documents, which we ask that you file in the captioned docket.

1. Prehearing Statement of County of Volusia; 04995-00
2. County of Volusia's Direct Testimony of Robert M. Weiss (reformatted substitute for previously filed November 1, 1999); and
3. County of Volusia's Rebuttal Testimony of George Mirabel.

Copies of these documents have been served to the parties shown on the attached Certificate of Service.

Very truly yours,

  
Frank B. Gummey, III  
Assistant County Attorney

FBG:mhl  
Enclosures (as stated above)

no diskette filed

AFA \_\_\_\_\_

APP \_\_\_\_\_

CAF \_\_\_\_\_

CMW \_\_\_\_\_

OTR \_\_\_\_\_

EAG \_\_\_\_\_

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MAS \_\_\_\_\_

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DOCUMENT NO  
04995-00



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO.: 990517-TL

Filed April 21, 2000

**PREHEARING STATEMENT OF COUNTY OF VOLUSIA**

County of Volusia ("Volusia") in compliance with the Order Establishing Procedure (Order No. PSC-99-2145-PCO-TL), issued by the Florida Public Service Commission (FPSC) on November 1, 1999, hereby submits its Prehearing Statement for Docket No. 990517-TL.

**A. Witnesses**

Volusia proposed to call the following witness to offer direct and rebuttal testimony on the issues in this docket:

<b><u>Witness</u></b>	<b><u>Issues</u></b>
Robert M. Weiss (Direct)	All
John E. Evans (Rebuttal)	All

Volusia reserves the right to call additional witnesses, witnesses to rebut staff testimony not yet filed, witnesses to respond to Commission inquires not addressed in direct testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on May 11, 2000.

**B. Exhibits**

Robert M. Weiss

Map of Southeast Volusia boundaries  
(to be supplied)

John E. Evans

County Resolution No. 2000-63

Volusia reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. Volusia also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida rules of Evidence and Rules of this Commission.

**C. Statement of Basic Position**

There is strong support by the County of Volusia government and the residents and business people of Volusia for the establishment and implementation of a single new NPA for Volusia County (and additional areas deemed appropriate by the FPSC). The government, residents and business people oppose the overlay of another NPA on the 904 NPA. Additionally, the greatly fragmented circumstance in Southwest Volusia, which is now divided by municipal, LEC, LATA, NPA and concentrated overlay NPA boundaries, all of which are in conflict, needs resolution by the establishment of one new NPA serving all of Volusia County.

The County requests that the single NPA be assigned as 386 (FUN).

#### **D. Volusia's Position on the Issues**

**Issue 1a:** Should the commission approve the industry's consensus relief plans for the 904 area code:

**Position:** No. The industry's consensus for relief plan ignores the service needs and desires and economic development efforts of Volusia achieved through a single NPA.

**Issue 1b:** If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the 904 area code?

**Position:** Any alternative that provides Volusia with a single new NPA.

**Issue 2a:** What number conservation measure(s), if any, should be implemented for the 904 area code?

**Position:** No position.

**Issue 2b:** If conservation measures are to be implemented, when should they be implemented?

**Position:** No position.

**Issue 3:** What should be the dialing patter for local, toll, EAS, and ECS calls for the 904 area code?

**Position:** Local - 7 digit; Toll - 11 digit; EAS - 7 digit; ECS - 7 digit.

**Issue 4:** What is the appropriate relief plan implementation schedule for the 904 area code?

**Position:** No position.

### **E. Volusia's Questions of Fact**

**Question 1:** Do customers prefer changing NPA or 11 digit dialing?

**Answer:** Volusia asserts that the majority of customers are willing to accept a new NPA to retain 7 digit dialing that they use in the vast majority of their personal and business communications.

**Question 2:** Will an overlay of a new NPA for 904 exacerbate confusion in Southwest Volusia?

**Answer:** Volusia believes the establishment of a fourth NPA in Southwest Volusia would add to the confusing service circumstance in Southwest Volusia.

### **F. Questions of Law**

None known.

### **G. Policy Questions**

**Issue 1:** Is a split of an NPA preferable to an overlay when service is over a large geographic area with several distinct economic hubs?

**Position:** Volusia believes that a very large NPA such as 904 which has several distinct economic hubs which are separated by significant distance and political boundaries lends itself to a split of NPAs. Jacksonville/Duval County and Daytona Beach/Volusia County are separated by approximately 90 miles and have very different economies. Daytona Beach/Volusia's tourist economy is greatly aided

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by having a distinct NPA identified with the area.

**Issue 2:** Should the FPSC act to relieve the confusion existing and to be compounded by the addition of a fourth NPA in Southwest Volusia?

**Position:** Volusia asserts that this is the appropriate time to include Southwest Volusia as a county-wide NPA before further fragmentation would occur with the imposition of a fourth NPA.

**G. Stipulations**

Volusia not aware of any stipulations.

**H. Pending Motions**

Volusia has not pending motions.

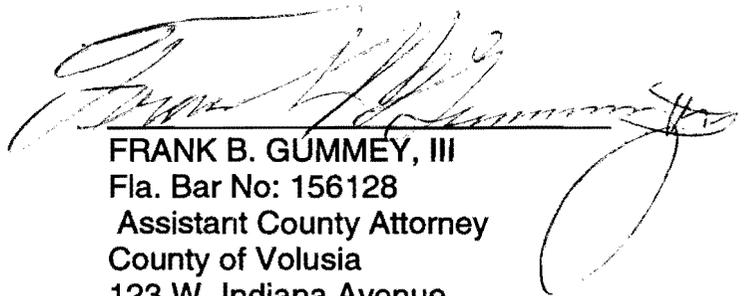
**I. Other Requirements**

Volusia will file out of time an exhibit of the various boundaries existing and proposed in Southeast Volusia.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by  
U.S. Mail to **all parties on the attached service list**, this 20th day of April, 2000.

**COUNTY OF VOLUSIA**

A handwritten signature in black ink, appearing to read 'Frank B. Gumme, III', is written over a horizontal line. The signature is cursive and extends to the right of the line.

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**CERTIFICATE OF SERVICE  
DOCKET NO.: 990517-TL**

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