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May 1, 2000

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VIA HAND DELIVERY

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

Re: Docket No. 990517-TL

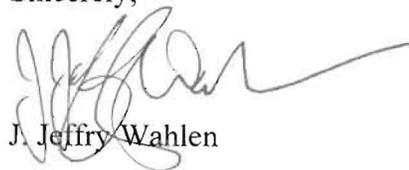
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Rebuttal Testimony of Harriet E. Eudy.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

JJW/csd

Enclosures

cc: All Parties of Record

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DOCUMENT NUMBER-DATE

05354 MAY-18

FPSC-RECORDS/REPORTING

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BEFORE THE PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY

OF

HARRIET E. EUDY

Q. Please state your name and business address.

A. My name is Harriet E. Eudy. My business address is 206 White Avenue, Live Oak, Florida 32060.

Q. Are you the same Harriet E. Eudy who filed direct testimony in this docket?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to address the 904 NPA relief plans proposed by Staff as set forth in the direct testimony of Lennie Fulwood and Exhibit LF-5. Specifically, I will comment on Alternatives 7 through 17 as set forth in Exhibit LF-5.

Q. Should the Florida Public Service Commission ("FPSC") approve Alternative Number 7?

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1 A. No, the FPSC should not approve Alternative Number 7.
2 This geographic split would result in Clay and Putnam
3 counties having two area codes; would divide numerous
4 local calling areas; and would result in NPAs with
5 unbalanced lives. Section 5.0(h) of NANPA's NPA Code
6 Relief Planning & Notification Guidelines
7 ("Guideline(s)") provides that the newly created
8 geographic areas have projected lives of approximately
9 the same number of years. Alternative Number 7 results
10 in a projected life of only 2.3 years for Area A versus
11 36.2 years for Area B. Additionally, the fastest growing
12 area ends up with the shortest (by a large amount) of the
13 two lives.

14
15 Guideline 5.0(f) also provides that customers not be
16 required to change again for a period of 8-10 years. An
17 exhaust period of only 2.3 years for Area A will likely
18 result in another change for Area A before ten years is
19 up.

20
21 To avoid customer confusion when implementing geographic
22 splits, the FPSC should avoid relief plans that would
23 further split counties into multiple area codes.
24 ALLTEL's Hastings exchange has local calling, dialed on a
25 7-digit basis, that terminates to Palatka and St.

1 Augustine. Under Alternative Number 7, these customers
2 would be inconvenienced by having to dial 10-digits to
3 complete local calls in one direction to Palatka while
4 continuing to dial 7 digits in the other direction to St.
5 Augustine.

6
7 Q. Should the FPSC approve Alternative Number 8?

8
9 A. No, the FPSC should not approve Alternative Number 8.
10 This alternative would require the use of two new NPAs,
11 rather than one. The use of two new NPAs appears to be
12 contrary to the Guideline 5.0(h), which requires relief
13 plans to result in the most effective use possible of all
14 codes serving a given area. In addition, the difference
15 in NPA lifetimes for Area A and B compared to Area C
16 would exceed the 15 years maximum included in the
17 Guidelines.

18
19 Q. Should the FPSC approve Alternative Number 9?

20
21 A. No, the FPSC should not approve Alternative Number 9.
22 This alternative results in unbalanced lives for Area A
23 and B compared to Area C in violation of the Guidelines.
24 Moreover, including Columbia County and a small portion
25 of Union County in Area A and B creates an "island" of

1 customers within Area C that would have different area
2 codes. There is quite a bit of local calling that exists
3 between these counties. For example, Branford and
4 Wellborn, both located in Suwannee County, have local
5 calling to Lake City in Columbia County. White Springs,
6 which is located in Hamilton County has local calling to
7 Lake City, and Boys Ranch, Live Oak, and Luraville, all
8 in Suwannee County have ECS calling to Lake City.
9 Raiford, which is in Union County has the 25 cent plan to
10 Lake City. All of these plans utilize 7-digit dialing.
11 This would result in significant customer confusion due
12 to the need to dial extra digits across the NPA
13 boundaries. This alternative also requires the use of
14 two new NPAs instead of one further exacerbating the
15 problem of division of local calling areas. Putnam and
16 Union counties could also potentially have three area
17 codes. One for the portion included in Area C and two
18 for the portion included in Area A and B. All of these
19 problems can be avoided by rejecting Alternative Number
20 9.

21
22 Q. Should the FPSC approve Alternative Number 10?

23
24 A. No, the FPSC should not approve Alternative Number 10.
25 There is a large community of interest for local calling

1 into Jacksonville from Baker and Clay counties. This
2 alternative would divide local calling areas for those
3 counties, and cause customer confusion.
4

5 Q. Should the FPSC approve Alternative Number 11?
6

7 A. No, the FPSC should not approve Alternative Number 11.
8 As with Alternative Number 7, this alternative would
9 result in unbalanced lives between Area A and B compared
10 to Area C; would require the use of two new NPAs rather
11 than one (like Alternative Number 10) and would divide
12 local calling areas. Under this alternative, Clay and
13 Putnam counties could potentially have three area codes;
14 one for the portions included in Area C and two for the
15 portions included in Area A and B. All of these problems
16 can be avoided by rejecting Alternative Number 11.
17

18 Q. Should the FPSC approve Alternative Number 12?
19

20 A. No, the FPSC should not approve Alternative Number 12.
21 This alternative would divide local calling areas and
22 have a dividing line that does not respect geographic or
23 political boundaries. ALLTEL believes that it is better
24 for dividing lines for the geographic splits to remain
25 along county lines or other political boundaries, or

1 neutral geographic boundaries, to avoid increased
2 customer confusion. Under this alternative, the
3 geographic split would divide both Clay and Putnam
4 counties, which should be avoided.

5
6 Q. Should the FPSC approve Alternative Number 13?

7
8 A. No, the FPSC should not approve Alternative Number 13.
9 Alternative Number 13 has the same problems as
10 Alternative Number 12, and should be rejected for the
11 same reasons that Alternative Number 12 should be
12 rejected.

13
14 Q. Should the FPSC approve Alternative Number 14?

15
16 A. No, the FPSC should not approve Alternative Number 14.
17 This alternative would require the use of two new NPAs
18 and still result in unbalanced lives for Area A compared
19 to Areas B and C. This plan would also divide local
20 calling areas. These problems can be avoided by
21 rejecting this alternative.

22
23 Q. Should the FPSC approve Alternative Number 15?

24

1 A. No, the FPSC should not approve Alternative Number 15.
2 Alternative Number 15 has the same problems as
3 Alternative Number 14, and should be rejected for the
4 same reasons that Number 14 should be rejected.

5
6 Q. Should the FPSC approve Alternative Number 16?

7
8 A. No, the FPSC should not approve Alternative Number 16. A
9 staggered geographic split as proposed in Part A and B of
10 Alternative Number 16 does little more than delay
11 implementation of the final NPA code relief plan
12 solution. Option 1 of Part B would provide the same
13 result as Alternative Number 6, but would require this to
14 be done in two phases rather than one. Option 2 would
15 require the use of an additional area code, which may not
16 be the most efficient use of number resources.
17 Additionally, this alternative has the same problems as
18 those outlined above for Alternative Number 9, regarding
19 interruption of 7-digit local calling areas.

20
21 Q. Should the FPSC approve Alternative Number 17?

22
23 A. No, the FPSC should not approve Alternative Number 17.
24 This alternative would divide Clay County and disrupt
25 some local calling areas. ALLTEL's Florahome exchange is

1 split between two counties, and has two different calling
2 scopes, which has created a significant amount of
3 customer confusion. This resulted from a Commission
4 order years ago. Further division of Clay County will
5 simply increase the level of confusion for customers. In
6 addition, ALLTEL's Melrose exchange, located in Alachua,
7 Bradford, Clay and Putnam Counties, is split 4 ways.
8 Further division would increase the level of confusion.

9
10 Q. Which alternative does ALLTEL recommend to the FPSC in
11 the 904 Area Code?

12
13 A. The Florida Telecommunications Industry agreed by
14 consensus that Alternative Number 1, a Distributed
15 Overlay, would be the best method to relieve number
16 exhaust in the 904 Area Code. ALLTEL supports the
17 industry recommendation.

18
19 Q. If the FPSC does not approve Alternative Number 1, does
20 ALLTEL have an alternative recommendation?

21
22 A. Yes. ALLTEL believes that Alternative Number 5 would have
23 the least impact on ALLTEL's customers. ALLTEL's Callahan
24 and Hilliard exchanges, located in Nassau County, have 7-
25 digit local or ECS calling between each other and to

1 Jacksonville. Alternative Number 5 would keep this area
2 together and would not result in customer confusion by
3 requiring a change in dialing.

4

5 Q. Does this conclude your rebuttal testimony?

6 A. Yes.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 1st day of May, 2000, to the following:

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