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ORIGINAL

May 1, 2000

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RECORDS AND REPORTING

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

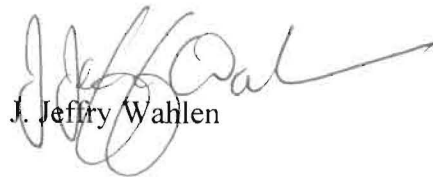
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Northeast Florida Telephone Company, Inc.'s Rebuttal Testimony of Deborah L. Nobles.

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

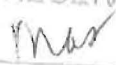
Enclosures

cc: All Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05355 MAY -18
FPSC-RECORDS/REPORTING

ORIGINAL

1 **BEFORE THE PUBLIC SERVICE COMMISSION**

2 **REBUTTAL TESTIMONY**

3 **OF**

4 **DEBORAH L. NOBLES**

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Q. Please state your name, address and position with Northeast Florida Telephone Company, Inc. ("Northeast" or "Company").

A. My name is Deborah L. Nobles. I am employed by Northeast as Vice President of Regulatory Affairs. My business address is 130 North 4th Street, Macclenny, Florida.

Q. Are you the same Deborah Nobles 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 Numbers 7 through 17 as set forth in Exhibit LF-5.

1 Q. Should the Florida Public Service Commission ("FPSC")
2 approve Alternative Numbers 7 through 17?

3

4 A. No, the FPSC should not approve any of Alternative
5 Numbers 7 through 17. I concur with the points made in
6 the rebuttal testimony of Harriet E. Eudy of ALLTEL
7 regarding Alternative Numbers 7 through 17, and believe
8 that all of those alternatives should be rejected for the
9 reasons outlined in witness Eudy's rebuttal testimony.

10

11 Q. Which Alternative does Northeast recommend to the FPSC in
12 the 904 Area Code?

13

14 A. The Florida telecommunications industry agreed by
15 consensus that Alternative Number 1, a distributed
16 overlay, would be the best method to relieve number
17 exhaust in the 904 Area Code. Northeast supports the
18 industry recommendation.

19

20 Q. If the FPSC does not approve Alternative Number 1, does
21 Northeast have an alternative recommendation?

22

23 A. Yes. Because of the significant community of interest for
24 local calling from Northeast's exchanges in Baker County
25 to Jacksonville, Northeast believes that Alternative

1 Number 6 modified to include Baker County in Area A would
2 be the next best area code relief solution for its
3 customers.

4
5 Q. Why should Alternative Number 6 be modified to include
6 Baker County in Area A?

7
8 A. Baker County has a strong community of interest with
9 Duval County and the City of Jacksonville, and Northeast
10 serves almost all of Baker County. Many of the people
11 who live in Baker County commute to Jacksonville to work,
12 and for shopping, entertainment and medical care. With
13 this in mind, the FPSC found a sufficient community of
14 interest between Baker County and Duval County to require
15 Northeast to provide Extended Local Calling ("ELC") to
16 Jacksonville. Under the Commission's mandated ELC plan,
17 Northeast's customers in Baker County may dial on a 7-
18 digit from Baker County to 148 NXXs in Jacksonville.

19
20 Alternative Number 6 as modified to include Baker County
21 in Area A would allow Northeast's customers to retain 7-
22 digit local dialing to those 148 NXXs. It would,
23 however, disrupt 7-digit local dialing from Northeast's
24 exchanges to Lake City in Columbia County. While there is
25 a community of interest between Northeast's exchanges and

1 Lake City, it is not as great as the community of
2 interest to Jacksonville.

3
4 Q. What impact would including Baker County in Area A have
5 on the projected life of Area A under Alternative Number
6 6?

7
8 A. While it is impossible to predict with certainty, I do
9 not believe that adding Baker County to Area A under
10 Alternative Number 6 would materially decrease the
11 expected life of Area A. Northeast presently serves
12 approximately 10,000 access lines in Baker County and has
13 three (3) NXXs assigned to it. Northeast's access line
14 growth rate is relatively slow, so Northeast does not
15 expect to need any new NXXs for several years. Indeed,
16 based on a recent analysis, Northeast has over 18,000
17 numbers in its three NXXs available for assignment or
18 reassignment. While the number conservation measures
19 being considered by the FPSC may reduce this number, I
20 believe that Northeast will not need a new NXX in the
21 foreseeable future. For these reasons, I do not believe
22 that adding Baker County to Area A under Alternative
23 Number 6. will materially decrease its expected remaining
24 life.

25

1 Q. Does this conclude your rebuttal testimony?

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3 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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