

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of : DOCKET NO. 990455-TP
:
REQUEST FOR REVIEW OF PROPOSED :
NUMBERING PLAN RELIEF FOR THE :
305/786 AREA CODE - DADE COUNTY :
AND MONROE COUNTY/KEYS REGION. :

In the Matter of : DOCKET NO. 990456-TP
:
REQUEST FOR REVIEW OF PROPOSED :
NUMBERING PLAN RELIEF FOR THE :
561 AREA CODE. :

In the Matter of : DOCKET NO. 990457-TP
:
REQUEST FOR REVIEW OF PROPOSED :
NUMBERING PLAN RELIEF FOR THE :
954 AREA CODE. :

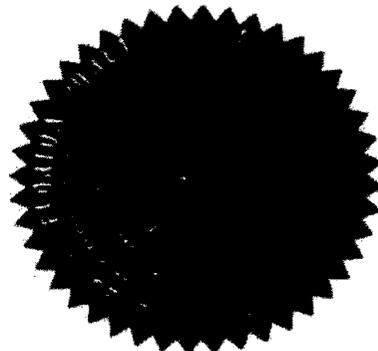
In the Matter of : DOCKET NO. 990517-TP
:
REQUEST FOR REVIEW OF PROPOSED :
NUMBERING PLAN RELIEF FOR THE :
904 AREA CODE. :

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VOLUME 2

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06449 MAY 25 8

FLORIDA PUBLIC SERVICE COMMISSION

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BEFORE: CHAIRMAN JOE GARCIA
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER E. LEON JACOBS, JR.
COMMISSIONER LILA A. JABER

DATE: Thursday, May 18, 2000

TIME: Commenced at 9:30 a.m.
Concluded at 10:07 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
FPSC Division of Records & Reporting
Chief, Bureau of Reporting
(850) 413-6732

APPEARANCES: (As heretofore noted.)

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ALLTEL FLORIDA, INC.
DOCKET NO. 990517-TP
FILED: 11-17-99

1 **BEFORE THE PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **HARRIET E. EUDY**

5 Q. Please state your name and business address.

6
7 A. My name is Harriet E. Eudy. My business address is 206
8 White Avenue, Live Oak, Florida 32060.

9
10 Q. By whom and in what capacity are you employed?

11
12 A. I am employed by ALLTEL Florida, Inc. ("ALLTEL" or the
13 "Company") as Manager, Regulatory Matters.

14
15 Q. Please describe your educational background.

16
17 A. I was graduated from North Florida Junior College in 1966
18 with an Associate in Arts degree. I began working for
19 North Florida Telephone Company (now ALLTEL Florida) in
20 the accounting and cost separations areas. I became a
21 supervisor in the regulatory department in 1987, and I
22 have held my current position in that department since
23 1991.

24
25 Q. What is the purpose of your testimony?

1 A. The purpose of my testimony is to present evidence in
2 support of the industry consensus single all services
3 distributed overlay relief plan. as the appropriate
4 method of providing area code relief in the 904 numbering
5 plan area. ("NPA").
6

7 Q. To what degree will your Company be impacted by a
8 decision in this docket?
9

10 A. In Florida, ALLTEL serves more than 90,000 access lines
11 in 27 exchanges. More than 74,000 of those access lines,
12 or 21 exchanges, are located in the Jacksonville LATA.
13 If the relief plan that is ultimately adopted results in
14 number changes for existing 904 customers in the
15 Jacksonville LATA, we will be impacted significantly.
16 Switch programming would be required and operational
17 support systems, including billing, customer service,
18 repair reporting and testing, would need to be updated.
19 Additional administrative expense will be incurred to
20 provide customer notification of the changes and respond
21 to customer inquiries and/or complaints.
22

23 Q. To what degree will ALLTEL's customers be impacted by a
24 decision in this docket?
25

1 A. ALLTEL is very concerned about the impact NPA relief will
2 have on its customers. ALLTEL understands that customers
3 would prefer to avoid NPA charges, but also recognizes
4 that the rapid growth of the telecommunications market
5 results in number usage and the need for NPA relief.
6 ALLTEL is also very aware that some customers are opposed
7 to 10 digit local dialing. ALLTEL notes that the
8 industry's guidelines specifically require consideration
9 of customer impact factors.

10
11 Q. What industry guidelines were used to develop the
12 recommended relief plan for the 904 NPA?

13
14 A. The industry recommendation attached to the petition
15 filed by Lockheed Martin IMS is the result of meetings
16 involving telecommunications industry members. The
17 industry participants followed the Industry Numbering
18 Committee's NPA Code Relief Planning and Notification
19 Guidelines ("Guidelines") to develop the recommended
20 relief plan for the 904 NPA. A copy of the current
21 Guidelines is attached to my testimony as Exhibit ____
22 (HEE-1). These guidelines have been used by the industry
23 in previous NPA relief proceedings in Florida.
24
25

1 Q. What principles do the Guidelines direct the industry to
2 consider?

3
4 A. Some of the NPA relief planning principles outlined in
5 the Guidelines include:

6 1. Relief options shall cover a period of at least five
7 years beyond the predicted date of exhaust.

8 2. Customers who undergo number changes shall not be
9 required to change again for a period of 8-10 years.

10 3. The use of protected codes (NXXs), which permit 7-
11 digit dialing across NPA boundaries, should be eliminated
12 or reduced to an absolute minimum.

13 4. Ideally, all of the codes in a given NXXs shall
14 exhaust about the same time in the case of splits.

15 5. The relief plan chosen should seek to minimize end
16 users' confusion while balancing the cost of
17 implementation by all affected parties.

18 6. All efforts should be made to choose a plan that does
19 not favor a particular interest group.

20 7. Dialing patterns for local calls should be
21 considered.

22
23 Q. Have you reviewed the various options under consideration
24 in this docket for area code relief?

25

1 A. Yes, I have. During the relief planning process, the
2 industry group concluded an all services overlay
3 (Alternative 1), a concentrated growth overlay
4 (Alternative 2), and three geographic splits
5 (Alternatives 3, 4 and 5). The industry also considered
6 a variation of Alternative 3, identified as Alternative
7 6, which moved certain rate centers in Clay County into
8 Area A as defined in Alternative 3.

9
10 Q. What alternative does the industry recommend?

11

12 A. The industry participants reached consensus on
13 Alternative 1, which is an all services distributed
14 overlay.

15

16 Q. Please describe Alternative 1.

17

18 A. Under Alternative 1, a new NPA would be overlaid over the
19 same geographic area covered by the existing 904 NPA.
20 All existing customers would retain their current area
21 code and telephone numbers. The plan would involve 10
22 digit dialing both within and across NPA boundaries of
23 the existing NPA and the new NPA.

24

25 Q. Why does Alternative 1 best meet the Guidelines?

1 A. The reasons that Alternative 1 was selected as the
2 consensus recommendation of the industry participants are
3 explained in the minutes of the industry meetings, which
4 are attached as Exhibit A to Lockheed Martin IMS's
5 petition in this docket. I agree with the evaluation of
6 the options as set forth in the minutes.

7
8 Q. What number conservation measures, if any, should be
9 implemented for the 904 NPA?

10
11 A. The Commission should continue its separate proceeding on
12 number conservation measures. Once that proceeding has
13 been completed, it should consider applying the
14 appropriate measures on a prospective basis for the 904
15 NPA and the new NPA used as part of the relief process
16 for the 904 NPA. Applying number conservation measures
17 in the 904 NPA on a retroactive basis would cause
18 confusion and would not significantly lengthen the life
19 of the existing 904 NPA.

20
21 Q. What should be the dialing pattern for local, toll, EAS
22 and ECS calls for the 904 NPA?

23

24

25

1 A. If the industry recommendation is adopted, 10 digit
2 dialing would be required for local, EAS and ECS calls.
3 1 plus 10 digit dialing would be required for toll calls.

4
5 Q. What is the appropriate relief plan implementation
6 schedule for the 904 NPA?

7
8 A. Once the FPSC approves the recommended relief plan, NANPA
9 can assign the new NPA within 14 days. The transitional
10 dialing period, which permits customers to dial service
11 on ten digits, should begin 90 days after the NPA is
12 assigned and should continue for 180 days.

13
14 Q. Please summarize your testimony.

15
16 A. ALLTEL believes that Alternative 1 should be adopted for
17 area code relief for the 904 NPA. Alternative 1 best
18 meets the industry objectives to provide the longest term
19 relief, while minimizing the number of customers that
20 will be required to change their NPA.

21
22 Q. Does that conclude your direct testimony?

23
24 A. Yes, it does.

25

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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BEFORE THE PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

DEBORAH J. NOBLES

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

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

Q. Please give a brief description of your background and experience.

A. I began my career in the telephone business in the Accounting Department of North Florida Telephone Company (now ALLTEL Florida, Inc.) in 1973. I was transferred to the company's regional headquarters in Matthews, North Carolina in 1976, where I held various management and supervisory positions in the accounting department until 1985 when I moved into the regulatory department. I was transferred to ALLTEL's corporate headquarters in April 1995 as Manager-State Regulatory Affairs and was promoted to Staff Manager-State Regulatory Affairs in 1999. While

1 working for ALLTEL, I had responsibility at various times
2 for overseeing regulatory matters in the states of North
3 Carolina, South Carolina, Florida, Georgia, Alabama,
4 Mississippi, Kentucky, Tennessee and Pennsylvania.

5 I began working for Northeast in January 1999 as Director
6 of Revenue Requirements and Regulatory Affairs and was
7 promoted to my current position in April 1999. My
8 current responsibilities include representing the local
9 exchange company subsidiaries of Townes
10 Telecommunications, Inc., which owns Northeast, in all
11 state and federal regulatory matters in the states of
12 Arkansas, Colorado, Florida, Kansas, Missouri and Texas.

13
14 Q. Please describe Northeast.

15
16 A. Northeast is a small incumbent local exchange company
17 with its headquarters in Macclenny, Florida. Northeast
18 serves approximately 9,000 access lines in its
19 certificated territory, which is in Baker County,
20 Florida. Northeast is a wholly owned subsidiary of
21 NEFCOM, Inc., which, in turn, is a wholly owned
22 subsidiary of Townes Communications, Inc. ("Townes").
23 Townes owns several rural telephone companies in the
24 states of Arkansas, Texas, Colorado, Florida, Kansas, and
25 Missouri. Northeast elected to be regulated by the FPSC

1 under the "price regulation" form of regulation in
2 February of 1999.

3
4 Q. What is the purpose of your testimony?

5
6 A. The purpose of my testimony is to state Northeast's
7 position on the appropriate numbering plan area relief in
8 the 904 area code.

9
10 Q. Please explain the alternatives for NPA relief for the
11 904 area code that have been considered by the industry
12 participants.

13
14 A. The industry participants considered six alternatives for
15 relief of the 904 NPA. The first alternative was an all
16 services distributed overlay. The second alternative was
17 a concentrated growth overlay. The third, fourth, fifth
18 and sixth alternatives were geographic splits. After
19 careful consideration, the industry participants reached
20 consensus on an all services distributed overlay as the
21 relief plan for the 904 NPA.

22 Q. Please describe the alternative recommended by the
23 industry.

24

25

1 A. The industry recommends Alternative 1 as set forth in the
2 petition filed by Lockheed Martin IMS in this proceeding.
3 Under Alternative 1, a new NPA would be overlaid over the
4 same geographic area covered by the existing 904 NPA.
5 All existing customers would retain their current area
6 code and telephone numbers. The plan would involve 10
7 digit dialing both within and across NPA boundaries of
8 the existing NPA and the new NPA.

9
10 Q. Why did the industry participant group select Alternative
11 1?

12
13 A. The reasons that Alternative 1 was selected as the
14 consensus recommendation of the industry participants are
15 explained in the minutes of the industry meetings, which
16 are attached as Exhibit A to Lockheed Martin IMS's
17 petition in this docket. I agree with the evaluation of
18 the options as set forth in the minutes.

19
20 Q. What number conservation measures, if any, should be
21 implemented for the 904 NPA?

22 A. The Commission should continue its separate proceeding on
23 number conservation measures. Once that proceeding has
24 been completed, it should consider applying the
25 appropriate measures on a prospective basis for the 904

1 NPA and the new NPA used as part of the relief process
2 for the 904 NPA. Applying number conservation measures
3 in the 904 NPA on a retroactive basis would cause
4 confusion and would not significantly lengthen the life
5 of the existing 904 NPA.

6

7 Q. What should be the dialing pattern for local, toll, EAS
8 and ECS calls for the 904 NPA?

9

10 A. If the industry recommendation is adopted, 10 digit
11 dialing would be required for local, EAS and ECS calls.
12 1 plus 10 digit dialing would be required for toll calls.

13

14 Q. What is the appropriate relief plan implementation
15 schedule for the 904 NPA?

16

17 A. Once the FPSC approves the recommended relief plan, NANPA
18 can assign the new NPA within 14 days. The transitional
19 dialing period, which permits customers to dial service
20 on ten digits, should begin 90 days after the NPA is
21 assigned and should continue for 180 days.

22

23 Q. Does this conclude your direct testimony?

24 A. Yes.

25

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?

2

3 A. Yes.

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

2 A. My name is Richard Guepe, and my business address is 1200 Peachtree
3 Street, N.E., Atlanta, Georgia 30309. I am employed by AT&T as a District
4 Manager in the Law & Government Affairs organization.

5 **Q. BRIEFLY OUTLINE YOUR EDUCATIONAL BACKGROUND AND**
6 **BUSINESS EXPERIENCE IN THE TELECOMMUNICATIONS**
7 **INDUSTRY.**

8 A. I received a Bachelor of Science Degree in Metallurgical Engineering in 1968
9 from the University of Notre Dame in South Bend, Indiana. I received a
10 Masters of Business Administration Degree in 1973 from the University of
11 Tennessee in Knoxville, Tennessee. My telecommunications career began
12 in 1973 with South Central Bell Telephone Company in Maryville,
13 Tennessee, as an outside plant engineer. During my tenure with South
14 Central Bell, I held various assignments in outside plant engineering,
15 buildings and real estate, investment separations and division of revenues.
16 At divestiture (1/1/84), I transferred to AT&T where I have held numerous
17 management positions in Atlanta, Georgia, and Basking Ridge, New Jersey,
18 with responsibilities for investment separations; analysis of access charges
19 and tariffs; training development; financial analysis and budgeting; strategic
20 planning; regulatory issues management; product implementation; strategic
21 pricing; and docket management.

22 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE**

1 **PUBLIC SERVICE COMMISSIONS?**

2 A. Yes, I have testified on behalf of AT&T in Florida, Alabama, Georgia,
3 Mississippi, North Carolina, South Carolina, and Tennessee on product
4 implementation issues, pricing issues, numbering issues, and policy issues.

5 **Q. ON WHOSE BEHALF ARE YOU APPEARING IN THESE**
6 **PROCEEDINGS?**

7 A. I am appearing on behalf of AT&T Communications of the Southern States,
8 Inc. and AT&T Wireless Services, a commercial mobile radio services
9 ("CMRS") provider, which have intervened in these dockets (which I will
10 collectively refer to as "AT&T").

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of my testimony is to provide AT&T's position concerning the
13 issues identified in these proceedings, which involve adoption of the
14 appropriate NPA relief plans for the 305/786, 561, 954, and 904 NPAs. My
15 testimony supports the industry's consensus relief plans for an overlay for
16 each of the NPAs, and urges the Commission to adopt such plans consistent
17 with their respective terms. As for the appropriateness of the Commission
18 attempting to adopt specific number conservation measures in these dockets,
19 the Commission should defer any such action to the work that the parties are
20 now undertaking in Docket No. 981444-TP. Any number conservation
21 measures the Commission may want to adopt should be implemented in a
22 uniform and comprehensive basis consistent with industry guidelines. The

1 Commission has correctly begun the number conservation process in Docket
2 No. 98144-TP, and reliance upon the work product of that docket is the best
3 approach to resolving Florida's needs.

4 **Q. SHOULD THE COMMISSION APPROVE THE INDUSTRY'S**
5 **CONSENSUS RELIEF PLANS FOR THE 305/786, 561, 954, AND 904**
6 **NPAs? (Issue 1a)**

7 A. Yes. The rules for the development and adoption of NPA relief plans are
8 very specific with respect to the process and requirements necessary for
9 reaching an industry consensus for NPA relief. Since the industry has
10 reached a consensus for an expanded overlay for 305 and a single all services
11 distributed overlay for each of the other NPAs at issue in these consolidated
12 proceedings, the Commission should approve these plans as filed since they
13 are in the public interest.

14 **Q. IF THE COMMISSION DOES NOT APPROVE THE INDUSTRY'S**
15 **CONSENSUS RELIEF PLAN FOR EACH OF THESE FOUR NPAs,**
16 **WHAT ALTERNATIVE PLANS SHOULD BE ADOPTED FOR EACH**
17 **NPA? (Issue 1b)**

18 A. We believe that the industry consensus relief plan for each NPA represents
19 the best means of relief, and each should be adopted. In the event the
20 Commission decides that it will not adopt those consensus relief plans, then
21 at this time we would recommend the following alternatives with the caveat
22 that any geographic split include an option for wireless carriers to grandfather

1 existing numbers (AT&T reserves its right to recommend in my rebuttal
2 testimony a different alternative for any NPA in the event a better alternative
3 emerges):

4 * For the 305/786 NPA, there is no other reasonable alternative to the
5 industry's proposed expanded overlay proposal. Quite simply, given the
6 population of the Florida Keys, it would be inappropriate and wasteful of
7 NPA resources to allocate a separate NPA to the Keys.

8 * For the 561 NPA, we recommend Alternative 2 with Area A
9 retaining 561.

10 * In the 954 NPA, there is no reasonable alternative consistent with
11 industry area code relief guidelines. The only appropriate relief methodology
12 for the 954 NPA is an all services overlay.

13 * For the 904 NPA, our first alternative would be the concentrated
14 growth overlay identified as Alternative 2. If that were not adopted, we
15 would recommend Alternatives 3 or 5 with Area A in either alternative
16 retaining the 904 code.

17 **Q. WHAT NUMBER CONSERVATION MEASURE(S), IF ANY,**
18 **SHOULD BE IMPLEMENTED IN THE 305/786, 561, 954, AND 904**
19 **NPAs? (Issue 2a)**

20 A. In Docket No. 981444-TP this Commission has already begun the process to
21 implement the number conservation measures that have been authorized by
22 the FCC in its September 15, 1999 order. Given the efforts of the industry

1 and Commission to address the broad spectrum of number conservation
2 measures authorized in Order No. FCC 99-249, it would be duplicative and
3 potentially wasteful of limited time, money, and personnel to have the parties
4 also attempt to develop conservation measures in these proceedings.

5 In the event the industry and Commission are unable to develop and
6 implement number conservation measures in Docket No. 98144-TP, then the
7 Commission should move forward with rate center consolidation, 1000s
8 number block management, and number pooling for LNP-capable carriers.

9 **Q. IF CONSERVATION MEASURES ARE TO BE IMPLEMENTED,**
10 **WHEN SHOULD THEY BE IMPLEMENTED? (Issue 2b)**

11 A. I would recommend that Commission undertake the necessary steps to
12 implement rate center consolidation as soon as it can be designed and
13 implemented. The 1000s block number management that has already been
14 agreed to on a voluntary basis by a number of Florida code holders, including
15 AT&T, can be implemented immediately, and would help prepare the code
16 holders for number pooling. Number pooling for LNP capable carriers
17 should be implemented consistent with the FCC's guidelines, preferably
18 pursuant to a national schedule.

19 **Q. WHAT SHOULD BE THE DIALING PATTERN FOR LOCAL, TOLL,**
20 **EAS, AND ECS CALLS FOR EACH OF THE NPAs AT ISSUE IN**
21 **THESE PROCEEDINGS? (Issue 3)**

22 A. For each relief plan utilizing an overlay, 10 digit dialing should be required

1 for all landline local calls, EAS calls, and ECS calls, with 1+ 10 digit dialing
2 being required for all landline toll calls. These actions would be consistent
3 with prior Commission decisions and the FCC's requirements.

4 **Q. WHAT IS THE APPROPRIATE RELIEF PLAN IMPLEMENTATION**
5 **SCHEDULE FOR EACH OF THE NPAs AT ISSUE IN THESE**
6 **PROCEEDINGS? (Issue 4)**

7 A. Each relief plan should be implemented as stated in the industry
8 recommendation, but in no event later than the anticipated exhaust date for
9 each NPA.

10 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY.**

11 A. Dealing with area code exhaust and the implementation of area code relief
12 plans can be a painful process for the public, industry, and the Commission.
13 While the exhaust of NPAs to some extent has been hastened by historical
14 network configuration requirements that may be less relevant today and
15 number assignment policies that have proven less than efficient as new local
16 competitors have attempted to enter the market, the Commission should
17 nevertheless remember that its first obligation in these proceedings is to adopt
18 a relief plan. The proposed industry consensus relief plans now before the
19 Commission have been developed after much analysis, discussion, and
20 experience and are fully compliant with the relevant NPA relief requirements.
21 While progress is being made and will continue to be made in the area of
22 number assignment and utilization policies, the best action the Commission

1 can undertake in these dockets will be to implement the industry consensus
2 relief plans.

3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4 **A. Yes, it does.**

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.**

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **DIRECT TESTIMONY OF DANIEL M. BAEZA**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NO. 990455-TL; 990456-TL; 990457-TL; 990517-TL**
5 **NOVEMBER 17, 1999**

6
7 **Q. Please state your name and business address.**

8
9 **A. My name is Daniel M. Baeza. My business address is 6451 North**
10 **Federal Highway, Fort Lauderdale, Florida.**

11
12 **Q. By whom are you employed and in what capacity?**

13
14 **A. I am employed by BellSouth as a Director in Infrastructure Planning for**
15 **the states of Florida, Alabama, Mississippi, and Louisiana.**

16
17 **Q. Please summarize your educational background, work experience, and**
18 **current responsibilities.**

19
20 **A. I received a bachelor of science degree in electrical engineering in**
21 **1974, and a master of science degree in electrical engineering in 1979,**
22 **both from the University of Miami. Also, I have qualified as a registered**
23 **professional engineer in the state of Florida. For the past twenty four**
24 **years, I have been an employee of BellSouth. From 1974 to mid-1979,**
25 **I held various assignments within the Florida Planning and Engineering**

1 Department, including circuit engineering, switch engineering, and
2 engineering staff. In 1979 I joined the Network Operations Department
3 as a budget analyst and software developer. I returned to the Network
4 Planning and Engineering Department in 1982 and managed the
5 operation of the E911 automatic location identification
6 system for BellSouth. In 1987, I accepted a rotational assignment with
7 Bell Communications Research in New Jersey, providing project
8 management for the development of new operations support systems.
9 In 1990, I returned to Planning and Engineering in Florida. I presently
10 hold the position of Director in Infrastructure Planning where I
11 am responsible for interoffice facility, switching, and fundamental loop
12 planning as well as other peripheral planning requirements like NPA
13 relief.

14

15 Q. What is the purpose of your testimony?

16

17 A. The purpose of my testimony is to provide BellSouth's support, as a
18 member of the Telecommunications Industry in the state of Florida, for
19 the NPA Relief selections made in the Industry Meetings held for that
20 purpose for the 305/786, 561, 954 and 904 NPA exhausts.

21

22 Q. What are BellSouth's recommendations for relief of the four NPAs due
23 to require relief?

24

25

1 A. BellSouth agrees with the Industry Recommendation resulting from
2 each of the Industry Meetings held in Florida to determine the
3 appropriate action. The consensus of the Industry, in each case, was
4 to relieve the exhausting NPAs via an overlay. In the specific instance
5 of the remainder of the 305 NPA, the Industry Recommendation was to
6 extend the existing overlay to the Keys area.

7

8 Q. Please comment on why BellSouth has agreed with the Industry
9 recommendations.

10

11 A. BellSouth agrees with the Industry recommendations for several
12 reasons. The overlay option provides the most cost effective
13 arrangement in that customer number changes would not be required
14 and the associated expense for such number changes would not be
15 incurred. This option offers an equal NPA relief period for all customers
16 and the most consistent and least confusing dialing arrangement since
17 ten digit dialing on a local basis would be required for the entire area.
18 As an example, the implementation of ten digit dialing in the 954 area
19 code would eliminate the current confusion and dialing problems
20 associated with the conflict between the 561 area code and the 561
21 NXX in Ft. Lauderdale, and the 786 area code and the 786 NXX in
22 Pompano Beach. Additionally, the institution of ten digit dialing for the
23 entire area maintains dialing parity. Finally, an overlay allows for the
24 easiest and most expeditious implementation method from both a
25 technical perspective and a customer education perspective and the

1 best and simplest migration path to future NPA relief by assuring the
2 elimination of number changes and the associated costs and confusion.

3

4 Q. What dialing patterns will be required for local, toll, and EAS calls if the
5 overlay is adopted?

6

7 A. Currently, where the dialing pattern is 7 digit for local calls, the
8 recommended overlay solution will change that arrangement to a
9 mandatory 10 digit dialing pattern. All local inter and intraNPA calls will
10 be dialed on a 10 digit basis. A 1+10 digit dialing pattern will still apply
11 to all toll calls and ECS calls where the Commission has allowed
12 competition.

13

14 Q. Does BellSouth have any recommendations or comments concerning
15 number conservation measures as it would affect these pending NPA
16 exhausts?

17

18 A. Yes. BellSouth is currently participating to the fullest extent possible in
19 all conservation measures instituted by the North American Numbering
20 Plan Administrator (NANPA). BellSouth recommends that these
21 measures continue until relief can be achieved. With regard to future
22 conservation measures that could delay or prevent premature NPA
23 exhaust, BellSouth is participating in the Florida Public Service
24 Commission Number Conservation Task Force to seek an efficient and
25 equitable solution to future conservation methods. BellSouth believes

1 the Commission should allow the Task Force to complete its work
2 before considering conservation measures for each of these area
3 codes.

4

5 Q. When should NPA relief be implemented?

6

7 A. It is in the best interests of the subscribers to communications services
8 in these exhausting NPAs that the Commission decide upon a relief
9 solution in a timely manner to meet the industry-proposed
10 implementation dates as provided by Lockheed-Martin. Historically,
11 such a timeframe has allowed for a transitional dialing period, which
12 permits customers to dial seven or ten digits, of up to 6 months. In
13 addition, the Commission should stagger area code relief
14 implementation to ensure each area code is implemented as smoothly
15 as possible.

16

17 Q. Does that conclude your testimony?

18

19 A. Yes, it does.

20

21

22

23

24

25

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

2 **A. My name is Suzanne Brooks. I am a Senior Staff Member in MCI WorldCom,**
3 **Inc.'s NPA Resource Management group. My business address is 701 Fifth**
4 **Avenue, Suite 500, Seattle, Washington 98104.**

5 **Q. PLEASE DESCRIBE YOU PROFESSIONAL BACKGROUND.**

6 **A. As a Senior Staff Member in NPA Resource Management, I represent MCI**
7 **WorldCom with respect to NPA relief planning and various numbering resource**
8 **issues. I regularly participate in state area code relief and number conservation**
9 **efforts, representing MCI WorldCom at industry meetings and in regulatory**
10 **proceedings. I have been employed by MCI WorldCom since February 1997.**

11 **Prior to being hired by MCI WorldCom, I was employed by GTE for 26**
12 **years, from 1969 to 1996. At the time I left GTE's employment, I was Senior**
13 **Product Manager-Switched Access, my responsibilities included budgeting for**
14 **Interexchange Access Revenues, new product development (such as 500 and 555**
15 **Access) and all Federal and State regulatory support relating to Switched Access.**
16 **Other responsibilities over the years have been in Traffic Study Engineering,**
17 **Capital Recovery, Depreciation, Tariffs, Operations, Marketing, and Operator**
18 **Services.**

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS

2 A. My name is Suzanne Brooks and my business address is 701 Fifth Avenue, Suite
3 500, Seattle Washington 98104.

4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5 A. The purpose of my rebuttal testimony is to address the statements filed in the
6 direct testimony of Daniel Baeza on behalf of BellSouth and Richard Guepe on
7 behalf of AT&T on November 17, 1999, in this proceeding.

8 Q. WHAT HAS BELLSOUTH AND AT&T PROPOSED IN THIS
9 PROCEEDING?

10 A. BellSouth and AT&T believe that the industry consensus relief plan for each NPA
11 represents the best means of relief, and each should be adopted.

12 Q. DO YOU AGREE WITH THIS PROPOSAL?

13 A. In Part, MCI WorldCom agrees with the industry consensus that was reached for
14 NPAs 305/786 and believes that there is no other reasonable alternative to the
15 industry's proposed expanded overlay proposal.

16 MCI WorldCom also agrees with the industry consensus to relieve the
17 exhausting NPA 954 via an overlay.

18 However MCI WorldCom does not agree with the industry consensus that
19 was reached for NPA 561. MCI WorldCom advocates a split because it would
20 preserve 7-digit dialing for customers within their home NPAs and would also
21 best serve a competitive local exchange services market. Unlike the above
22 recommendations, there are no special circumstances in the 561 NPA that

1 warrants implementing an overlay. Thus, MCI WorldCom disagrees with the
2 industry proposed over and believes a geographic split is the most appropriate,
3 competitively neutral method of relief for the 561 NPA.

4 MCI WorldCom did not intervene in Docket 990517-TL and has no
5 opinion for relief of NPA 904.

6 **Q. DOES MCI WORLDCOM HAVE A RECOMMENDED SPLIT**
7 **ALTERNATIVE FOR NPA 561?**

8 A. MCI WorldCom can support the recommendation made by AT&T that split
9 Alternative 2 with Area A retaining 561.

10 **Q. DOES MCI WORLDCOM HAVE ANY OTHER CONCERNS WITH THE**
11 **PROPOSALS MADE BY EITHER BELLSOUTH OR AT&T?**

12 A. Yes, AT&T suggests that in the event the Commission decides that it will not
13 adopt the consensus relief plans that any geographic split include the caveat that
14 wireless carriers be allowed to "grandfather" existing numbers.

15 **Q. DO YOU AGREE WITH AT&T'S PROPOSAL.**

16 A. No. One segment of the industry, wireless carriers (and their customers) should
17 not be exempted from the burden and associated costs of an area code change.
18 Additionally, any assumptions for the projected life of the alternative splits do not
19 take into consideration the "grandfathering" of wireless numbers, which could
20 have a significant impact to those projections.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes.

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

2 A. My name is Kelly Faul. I am a Senior Staff Member in MCI WorldCom
3 Inc.'s NPA Resource Management group. My business address is 8521
4 Leesburg Pike, Vienna, VA, 22182.

5

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
7 **BACKGROUND.**

8 A. As a Senior Staff Member in NPA Resource Management, I represent MCI
9 WorldCom with respect to NPA relief and various numbering issues. I
10 regularly participate in state area-code-relief and number-conservation
11 efforts, representing MCI WorldCom at industry meetings and in regulatory
12 proceedings. I have been employed by MCI WorldCom for the past fifteen
13 years. From 1994 to 1997, I was Tariff Manager in the Business Markets
14 segment's Business Analysis department, responsible for federal and state
15 tariff filings. From 1986 to 1994 I held various positions in the Legal and
16 Information System Department in which I provided litigation support.
17 From 1983 to 1986, I worked in the Litigation Support Department, in
18 which I performed similar tasks. I have a Masters of Business
19 Administration in Management from Virginia Tech, Falls Church, VA, and
20 a Bachelor of Science in Business Administration from Wheeling Jesuit
21 University, Wheeling, WV.

22

1 PURPOSE

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 A. The purpose of this testimony is to discuss MCI WorldCom's position
4 regarding the area code relief plans submitted by the North American
5 Numbering Plan Administrator (NANPA) to the Florida local exchange
6 carrier industry and to this Commission for the 305/786, 561, and 954 NPAs
7 in Florida, and to identify the impact on consumers and the local exchange
8 market. My testimony also recommends general dialing patterns for each
9 of the area code relief alternatives and appropriate implementation
10 schedules.

11

12 **Q. WHAT TYPE OF AREA CODE RELIEF DOES MCI WORLDCOM**
13 **GENERALLY RECOMMEND?**

14 A. MCI WorldCom generally advocates geographic splits as the most pro-
15 competitive method of area code relief. First, a geographic split is the most
16 widely accepted method of NPA relief and is preferred by most residential and
17 business consumers in part because it does not require mandatory 10-digit
18 dialing for all local calls. Second, a geographic split is also competitively
19 neutral in that it does not introduce infirmities to the development of an
20 effectively competitive local telecommunications market.

1 There are, however, certain circumstances where a geographic split may not be
2 an appropriate method of area code relief. Specifically, as I will explain, a
3 geographic split is not appropriate relief for the 305/786 and 954 NPAs.

4

5 AREA CODE RELIEF ALTERNATIVES

6 **Q. WHAT SHOULD THE COMMISSION CONSIDER WHEN**
7 **DETERMINING WHICH NPA RELIEF ALTERNATIVE IS BEST**
8 **FOR THE 305/786, 954, AND 561 NPAS?**

9 A. In selecting which area code relief alternative is best for each of these
10 NPAs, the Commission should consider the impact on the end user and on
11 emerging local competition. Moreover, the Commission should also
12 consider whether any negative impact, if any, can be mitigated.

13

14 **Q. HOW ARE END USERS AFFECTED BY IMPLEMENTATION OF**
15 **SPLIT AND OVERLAY RELIEF ALTERNATIVES?**

16 A. Unfortunately, some end users will suffer some cost and disruption under
17 either a split or an overlay alternative, although the degree to which end
18 users are negatively affected differs based on the alternative selected.

19 The impact of an overlay on end users includes: 1) loss of all 7-digit
20 local dialing; 2) loss of the ability to associate an area code with a unique
21 geographic area; 3) confusion resulting from different area codes assigned in
22 the same home, business or neighborhood; 4) cost to customers throughout

1 the overlay area that currently use their 7-digit number for advertising,
2 stationery, etc., for new materials with their 10-digit number; and 5) cost to
3 customers throughout the overlay area to reprogram or replace automatic
4 dialing systems including home alarm and apartment security systems,
5 elevator emergency phones, computer programs, call forwarding, call
6 blocking, and priority call features that are currently programmed for 7-
7 digits.

8 The impact of an area code split on end users includes: 1) the need
9 for customers in a portion of the existing area code to change their area
10 codes; 2) the need for some additional 10-digit dialing for calling between
11 the old and new area codes; and 3) the cost to customers in the new area
12 code to show the new area code on letterhead, stationery, etc.

13

14 **Q. WHY DOES IMPLEMENTATION OF A GEOGRAPHIC SPLIT PLAN**
15 **GENERALLY PRESENT FAR FEWER RISKS TO END USERS THAN**
16 **AN OVERLAY PLAN?**

17 A. Generally speaking, elevator telephones, burglar alarms, and building entry
18 systems will continue to function as always after a geographic split is
19 implemented. With a geographic split, NPAs are still area codes, in that the
20 NPA still defines an area. Since with a NPA split, the NPA will retain the
21 current geographic identity of an area, it will be easier to remember the NPA
22 for a particular number. This is because with a geographic split each NPA will

1 still represent a distinct geographic area and each geographic area will become
2 identified with the specific NPA used.

3

4 **Q. HOW IS EMERGING LOCAL EXCHANGE COMPETITION**
5 **AFFECTED BY OVERLAY AND SPLIT RELIEF ALTERNATIVES?**

6 A. An overlay plan can significantly frustrate entry by competitors into the
7 local exchange market, and provide the incumbent LEC ("ILEC") with a
8 competitive advantage. An overlay plan creates two NPAs in the same area:
9 1) the "current" NPA, and 2) a "new" NPA covering the same geographic area.
10 Customers are familiar with the current NPA and associate that NPA with a
11 specific area. If an overlay is implemented, however, the new NPA will not be
12 as desirable to customers because it is unfamiliar, particularly immediately
13 following the creation of the new code.

14 Currently, the vast majority of the more desirable NXXs in the
15 current area code have already been assigned to the ILECs. If an overlay
16 plan is implemented, alternative local exchange companies (ALECs) would
17 be left to draw NXXs primarily from the new, overlay NPA. This system of
18 NXX "haves" and "have-nots" is extremely anticompetitive, since it
19 disproportionately affects ALECs just as they are attempting to enter the
20 local exchange market in Florida.

21 The disparity between the "current" and the "new" NPAs created under
22 an overlay plan also extends to the market for new customers and existing

1 customers who want to add new lines. An individual or business ordering new
2 service, when faced with a choice between a telephone number in the
3 "current", familiar NPA, and a number in the "new", unfamiliar NPA, which is
4 geographically associated with nowhere in the public psyche, will likely
5 choose the number in the familiar area code.

6

7 **Q. IS IMPLEMENTATION OF A GEOGRAPHIC SPLIT**
8 **COMPETITIVELY NEUTRAL?**

9 A. Yes. Geographic splits are competitively neutral because both carriers and
10 customers will ubiquitously experience the change. A geographic split will still
11 create a new code which both carriers and customers will need to become
12 familiar. While an overlay plan exiles ALECs to the new, less desirable area
13 code, a geographic split affects all carriers equally. Under a geographic split,
14 there is no additional incentive to select the ILEC over a competing carrier,
15 either for new service or for additional lines within the same business or
16 residence because both ALECs and ILECs will have equal access to numbers
17 in the appropriate area code.

18

19 305/786 AREA CODE RELIEF

20 **Q. WHAT AREA CODE ALTERNATIVES ARE BEING CONSIDERED**
21 **FOR THE 305/786 AREA CODE?**

1 A. Five area code relief alternatives were considered for number exhaust relief in
2 the 305/786 area code. The NANPA has presented to the Commission, based
3 on industry consensus, that the 786 overlay NPA be expanded to include the
4 entire 305 area code. The other alternatives involved combinations of splits
5 and overlays, multiple overlay NPAs, and a split with a very unbalanced future
6 life.

7

8 **Q. DOES MCI WORLDCOM SUPPORT THE INDUSTRY**
9 **RECOMMENDATION FOR RELIEF IN THE 305/786 AREA CODE?**

10 A. Yes, MCI WorldCom supports the industry recommendation that the 786
11 overlay be expanded to include the entire 305 area code.

12

13 **Q. WHY DOES MCI WORLDCOM SUPPORT THE INDUSTRY**
14 **RECOMMENDATION FOR AN OVERLAY IN THE 305/786 AREA**
15 **CODE RATHER THAN IMPLEMENTING A GEOGRAPHIC SPLIT**
16 **AS MCI WORLDCOM GENERALLY ADVOCATES?**

17 A. Although MCI WorldCom generally does not support implementation of an
18 overlay, MCI WorldCom supports the industry proposal for extending the 786
19 overlay, because this solution provides for the least amount of customer
20 confusion and the best use of NPA resources in this instance. The current 786
21 NPA overlay was initially implemented to provide additional numbering
22 resources to the greater Miami portion of the 305 NPA. While this may have

1 appeared to solve the problem of depleted 305 numbering resources in the area
2 of most growth, it is an inefficient solution for the entire 305 geographic area.
3 Since the numbering resources provided by the 786 NPA overlay were limited
4 to the greater Miami area, the "non-786" area was left with too few numbering
5 resources to provide customers in this area with the benefits of local
6 competition. The industry recommendation for alleviating this problem is to
7 extend the 786 NPA to include the entire area covered by the 305 area. This
8 proposal will distribute the available numbering resources from the 786 NPA
9 in the most effective manner.

10

11 954 AREA CODE RELIEF

12 **Q. WHAT AREA CODE ALTERNATIVES ARE BEING CONSIDERED**
13 **FOR THE 954 AREA CODE?**

14 A. Two area code relief alternatives were considered for number exhaust relief in
15 the 954 area code. The NANPA has presented to the Commission, based on
16 industry consensus, that an overlay be implemented for 954 area code relief.

17

18 **Q. DOES MCI WORLDCOM SUPPORT THE INDUSTRY**
19 **RECOMMENDATION FOR RELIEF IN THE 954 AREA CODE?**

20 A. Yes, MCI WorldCom supports the industry recommendation that an overlay
21 be implemented for 954 area code relief.

22

1 **Q. WHY DOES MCI WORLDCOM SUPPORT THE INDUSTRY**
2 **RECOMMENDATION FOR AN OVERLAY IN THE 954 AREA CODE**
3 **RATHER THAN IMPLEMENTING A GEOGRAPHIC SPLIT AS MCI**
4 **WORLDCOM GENERALLY ADVOCATES?**

5 A. Although MCI WorldCom generally would not advocate implementation of an
6 overlay, the circumstances in this instance make an overlay the appropriate
7 solution. The NANPA attempted to identify appropriate splits lines in 954.
8 One of the goals of determining the best area code relief method is to ensure
9 that the estimated lives between the areas split by implementation of the new
10 area code(s) are balanced. Unfortunately, the only split that produced balanced
11 lives was with a split line that bisected the Ft. Lauderdale rate center.

12

13 **Q. WHY IS IT INAPPROPRIATE TO SPLIT A RATE CENTER?**

14 A. Bisecting a rate center creates an adverse impact on both consumers and
15 carriers. Today, NPA-NXXs are assigned on a rate center basis. If a rate
16 center is split with an NPA boundary, one of two things will occur. Customers
17 on one side of the split line in the affected rate center will require new 10-digit
18 telephone numbers or carriers will be required to procure duplicate NXXs for
19 each side of the split line. This happens because the "old" NPA-NXXs will
20 only be associated with the side of the rate center that retains the "old" NPA.
21 Customers on the side of the "new" NPA will require a new telephone
22 number. Duplicate NXX codes, assignment to a carrier of the same NXX code

1 in both NPAs, can resolve this situation; however, this is an inefficient use of
2 numbering resources and will shorten the lives of both NPAs. Carriers will be
3 required to determine the exact physical location of each customer to
4 determine which side of the line the customer falls and then determine whether
5 the customer requires a new number. This has an impact on customers with
6 ported numbers as well as those without ported numbers.

7

8 561 AREA CODE RELIEF

9 **Q. WHAT AREA CODE ALTERNATIVES ARE BEING CONSIDERED**
10 **FOR THE 561 AREA CODE?**

11 A. Three area code relief alternatives were considered for number exhaust relief
12 in the 561 area code consisting of an overlay and two splits. The NANPA has
13 presented to the Commission, based on industry consensus, that the overlay
14 area code alternative be implemented.

15

16 **Q. DOES MCI WORLDCOM SUPPORT THE INDUSTRY**
17 **RECOMMENDATION FOR RELIEF IN THE 561 AREA CODE?**

18 A. No. MCI WorldCom does not support the industry's recommendation.

19

20 **Q. WHY IS AN OVERLAY INAPPROPRIATE RELIEF FOR THE 561**
21 **NPA?**

1 A. For the reasons discussed previously in this testimony, MCI WorldCom
2 advocates a split because it would preserve 7-digit dialing for customers
3 within their home NPAs and would also best serve a competitive local
4 exchange services market. Unlike the 305/786, and 954 NPAs, there are
5 no special circumstances in the 561 NPA that warrant implementation of an
6 overlay. Thus, a geographic split is the most appropriate, competitively
7 neutral method of relief for the 561 NPA. MCI WorldCom does not,
8 however, favor one split alternative over the other. This Commission is best
9 suited to determine which split alternative best meets the needs of
10 telecommunications customers in this area.

11

12 DIALING PATTERNS

13 **Q. WHAT DIALING PATTERNS SHOULD BE IMPLEMENTED WITH**
14 **THESE VARIOUS AREA CODE RELIEF ALTERNATIVES?**

15 A. Dialing patterns for local, toll, EAS, and ECS calls generally should be the
16 same today as they are after relief is implemented, with two exceptions. In
17 the case of an overlay, all calls must be placed using the area code, even if
18 the area codes of the originating and terminating calls are the same. In the
19 case of a geographic split, the area code must also be dialed when calls are
20 placed across NPA boundaries.

1 IMPLEMENTATION SCHEDULE

2 **Q. WHAT IMPLEMENTATION SCHEDULE DOES MCI WORLDCOM**
3 **RECOMMEND FOR THE NEW AREA CODES?**

4 A. MCI WorldCom supports the industry's implementation schedule already
5 submitted to this Commission by the NANPA and suggests that each area
6 code relief implementation be staggered by three months. Staggering each
7 of the implementation dates by three months will not place undue burdens
8 on carriers' networks or work forces. These implementation schedules
9 should be prioritized by exhaust dates. The 1999 COCUS shows the
10 following exhaust dates for the affected area codes: 305 in the 1Q2000,
11 561 in the 4Q2001, 954 in the 4Q2001, and 904 in the 4Q2001.
12 Implementation of the relief NPAs should be completed so that no NPA
13 depletes its NXXs before the implementation is completed. The COCUS
14 data should be used rather than the exhaust date based on jeopardy rationing.
15 Rationing is an artificial process that extends the life of the NPA at the
16 expense of carriers' ability to provide service to their customers. In a
17 jeopardy situation carriers cannot receive NXX codes in a timely manner to
18 satisfy customer demand, and must wait until they "win" an NXX in the
19 lottery to procure numbers. Carriers can wait for many months to "win" an
20 NXX and in the process may lose potential customers during that waiting
21 period.

22

1 CONCLUSION

2 **Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT**
3 **TESTIMONY?**

4 **A. Yes, it does.**

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **REBUTTAL TESTIMONY OF STAN L. GREER**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NOS. 990455-TP, 990456-TP, 990457-TP; 990517-TP**
5 **APRIL 21, 2000**

6

7 **Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS AND**
8 **YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.**
9 **("BELLSOUTH").**

10

11 **A. My name is Stan L. Greer. I am a Manager in the State Regulatory**
12 **Office located at 150 South Monroe Street, Suite 400, Tallahassee, FL**
13 **32302.**

14

15 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

16

17 **A. I graduated from the University of Kentucky in 1986 with a Bachelor of**
18 **Science in Electrical Engineering. In January 1987, I accepted a**
19 **position with the Florida Public Service Commission as an Engineer I in**
20 **the Division of Communications. In December 1995, I became the**
21 **Supervisor for the Division of Communication's Carrier Services**
22 **Section. During my tenure with the Commission, I acted as the**
23 **Chairman for the NARUC Subcommittee on Technology and**
24 **coordinated numerous Commission proceedings that established the**
25 **basis for many of the Commission's current policies associated with**

1 certification, depreciation, alternative access vendors services,
2 implementation of state and federal statutes associated with
3 competition, and various numbering issues. One of my main
4 responsibilities in the Division of Communications, as it relates to these
5 proceedings, was to develop and make recommendations on state and
6 federal numbering issues. In this capacity, I participated in the
7 development and implementation of numerous area code relief
8 proposals, acted as the Chairman of the Florida Number Portability
9 Steering Committee, and participated as a NARUC representative on
10 the North American Numbering Council.

11

12 In April of 1998, I accepted my current position with BellSouth as a
13 Manager-Regulatory Relations. My main job responsibility in this
14 position is to act as an interface between BellSouth and the Florida
15 Public Service Commission on all issues before the Commission that
16 involve or may affect BellSouth Telecommunications, Inc.

17

18 Q. DID YOU FILE DIRECT TESTIMONY IN THIS DOCKET?

19

20 A. No. I am adopting the Direct Testimony of Dan Baeza filed on behalf of
21 BellSouth in these dockets on November 17, 1999.

22

23 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
24 TODAY?

25

- 1 A. The purpose of my rebuttal testimony is to address statements made
2 by various witnesses in their direct testimony and to address
3 statements and recommendations made by witnesses at the various
4 service hearings for the 305/786, 561, 904, and 954 NPAs.
5
- 6 Q. MCI WORLDCOM'S WITNESS, GREG DARNELL, ON PAGE SIX OF
7 HIS DIRECT TESTIMONY, STATES THAT THE FLORIDA PUBLIC
8 SERVICE COMMISSION (FPSC) CAN USE THE CONDITIONAL
9 AUTHORITY GRANTED TO IT BY THE FEDERAL
10 COMMUNICATIONS COMMISSION (FCC) TO ADDRESS
11 EXCESSIVE FOOTPRINT DEMAND. ONE OF THE MECHANISMS
12 HE IDENTIFIES IS RATE CENTER CONSOLIDATION. DID THE FCC
13 GRANT THE FPSC AUTHORITY TO IMPLEMENT RATE CENTER
14 CONSOLIDATION (RCC)?
15
- 16 A. No, the FCC did not grant such authority. The FCC, however,
17 expressed its belief that the FPSC should consider RCC before
18 implementing number pooling. It recognized that it did not have the
19 authority to give the FPSC the ability to implement RCC.
20
- 21 Q. CAN YOU BRIEFLY EXPLAIN RCC?
22
- 23 A. Rate Center Consolidation is the function of aggregating multiple rate
24 centers (in BellSouth's territory rate centers are the same as
25 exchanges) into fewer rate centers.

1 Q. IN YOUR OPINION, DOES THE FPSC HAVE THE AUTHORITY TO
2 ORDER RCC?

3

4 A. Although I am not an attorney, it is my understanding that the FPSC
5 lacks authority to require companies who are subject to price regulation
6 to implement RCC. If the FPSC consolidated rate centers, as
7 discussed in the Commission's working groups established in Docket
8 No. 981444-TP, it would have the same affect as requiring companies
9 to implement additional extended area service (EAS) and extended
10 calling service (ECS) routes. In numerous requests to the FPSC, the
11 Commission has recognized that it lacks such authority unless the price
12 regulated companies are willing to voluntarily implement such offerings.

13

14 Q. IS BELLSOUTH WILLING TO IMPLEMENT RCC ON A VOLUNTARY
15 BASIS?

16

17 A. Yes. BellSouth is willing to implement RCC, provided the FPSC allows
18 BellSouth to recover the cost of implementation and it is revenue
19 neutral.

20

21 Q. ON PAGE 2 OF KELLY FAUL'S DIRECT TESTIMONY, MCI
22 WORLDCOM'S WITNESS, SHE STATES THAT MCI WORLDCOM
23 GENERALLY RECOMMENDS A GEOGRAPHIC SPLIT AS THE TYPE
24 OF AREA CODE RELIEF SUPPORTED BY HER COMPANY. IS A
25 GEOGRAPHIC SPLIT THE ONLY COMPETITIVELY NEUTRAL CODE

1 **METHOD TO PERFORM NPA RELIEF?**

2

3 **A. Generally speaking, I agree that a split is competitively neutral. I also**
4 **believe, as stated in FCC Order No. 96-333, paragraphs 273-291, that**
5 **an overlay is competitively neutral provided certain criteria is**
6 **implemented such as 10-digit dialing for all local calls. The**
7 **telecommunications industry in the state of Florida agreed (by**
8 **consensus) that an overlay would be the best method to relieve**
9 **upcoming NPA exhausts. As a member of that industry, BellSouth**
10 **supports that decision. BellSouth believes that anti-competitive**
11 **circumstances will not arise since an overlay will be implemented**
12 **pursuant to the FCC criteria and carriers will have access to telephone**
13 **numbers on an equal basis.**

14

15 **Q. ON PAGE 7 OF HARRIET EUDY'S DIRECT TESTIMONY, ALTEL'S**
16 **WITNESS, SHE STATES THAT IF THE FPSC IMPLEMENTS THE**
17 **INDUSTRY RECOMMENDATION FOR THE 904 AREA CODE, THE**
18 **FPSC SHOULD IMPLEMENT 10-DIGIT DIALING ON ECS ROUTES.**
19 **DO YOU AGREE WITH HER PROPOSAL?**

20

21 **A. No. If the FPSC implements the industry overlay recommendation, I**
22 **believe it should require the companies to implement 1+10 digit dialing**
23 **on ECS routes with competition instead of 10-digit dialing unless there**
24 **are some technical limitations. BellSouth believes implementation of**
25 **this dialing pattern is consistent with the dialing parity requirements of**

1 the FCC.

2

3 Q. IN MCI WORLDCOM WITNESS KELLY FAUL, AT PAGE 11, VOLUSIA
 4 COUNTY WITNESS ROBERT WEISS, AT PAGE 4, AT&T WITNESS
 5 RICHARD GUEPE, AT PAGE 5 AND 6, NORTHEAST FLORIDA
 6 WITNESS DEBORAH NOBLES, AT PAGE 5, AND ALLTEL WITNESS
 7 HARRIET EUDY'S DIRECT TESTIMONY, AT PAGE 7, THE
 8 WITNESSES IDENTIFIED SPECIFIC DIALING PATTERNS FOR
 9 VARIOUS TYPE OF CALLS WITHIN EACH AREA CODE THAT THEY
 10 BELIEVE SHOULD BE IMPLEMENTED ALONG WITH THE
 11 IMPLEMENTATION OF A GEOGRAPHIC SPLIT NPA RELIEF
 12 ARRANGEMENT. DO YOU AGREE WITH THEIR PROPOSALS?

13

14 A. No. The dialing patterns proposed by these witnesses appear to be
 15 inconsistent with the dialing patterns the FPSC has implemented in
 16 various other geographic split NPA relief plans. Listed below are the
 17 typical dialing patterns ordered by the FPSC in other area code relief
 18 proceedings:

19

	Type of Plan		
Type of Call	Within Geographic Area Code	Within Overlay	Between Area Codes*
Local/EAS	7	10	10
ECS without IXC	7	10	10
Competition			

25

1	ECS with IXC	1+10	1+10	1+10
2	Competition			
3	Toll	1+10	1+10	1+10

4 * Orders only indicated dialing between area code outside of overlay
5 Note: Dialing Patterns from FPSC Order Nos. PSC-98-1761-FOF-TL
6 and PSC-99-1066-FOF-TL

7
8 BellSouth believes the Commission should implement the dialing
9 patterns referenced above. In past Commission orders, it is unclear as
10 to what dialing pattern the FPSC believes the companies should
11 implement for calling routes that ECS with IXC competition which are
12 between area codes. As discussed above, BellSouth believes the
13 Commission should require all calling routes that are ECS with IXC
14 competition to be dialed on a 1+10 digit basis unless it is not technically
15 feasible. Although the previous Commission orders have not been
16 clear, BellSouth believes the Commission's intent was to require 1+10
17 digit dialing for these routes. BellSouth believes the dialing patterns
18 referenced above provide dialing parity consistent with this
19 Commission's intent as well as the FCC's dialing parity order.
20 BellSouth would recommend the FPSC implement these dialing
21 patterns as it addresses area code relief proposals.

22
23 Q. ON PAGE 20 OF SPRINT'S WITNESS SCOTT LUDWIKOWSKI'S
24 DIRECT TESTIMONY, HE STATES THE NATIONWIDE FILL RATE
25 FOR INCUMBENT LECS IS AT 35.6%. IS BELL SOUTH'S FILL RATE

1 **CONSISTANT WITH THE NATIONAL FILL RATE FOR INCUMBENTS**
2 **LECS?**

3

4 **A. No. As provided in response to staff's utilization data request,**
5 **BellSouth's fill rate for all of its area codes is in the range of 75% to**
6 **88%.**

7

8 **Q. IN SEVERAL PAGES OF THOMAS FOLEY'S DIRECT TESTIMONY,**
9 **NANPA WITNESS, AND AT THE VARIOUS SERVICE HEARINGS,**
10 **MR. FOLEY PRESENTED THE ALTERNATIVES BEING**
11 **CONSIDERED FOR EACH AREA CODE RELIEF. DID THE**
12 **INDUSTRY CONSIDER ALL OF THE RELIEF PROPOSALS**
13 **PRESENTED BY MR. FOLEY AT THE SERVICE HEARINGS?**

14

15 **A. No. As pointed out by Mr. Foley at the service hearings, neither**
16 **NANPA nor the industry reviewed or evaluated the various relief plans**
17 **developed by Staff since the plans were not available to the industry**
18 **prior to the service hearings.**

19

20 **Q. DOES BELL SOUTH HAVE ANY INFORMATION AS TO HOW THE**
21 **EXHAUST DATES WERE DETERMINED FOR THE VARIOUS RELIEF**
22 **PLANS DEVELOPED BY STAFF?**

23

24 **A. It is my understanding that the staff modified the type of data attached**
25 **to Mr. Foley's testimony to address the specifics associated with each**

1 relief plan. It should be noted that at the April 6, 2000 Staff Workshop,
2 Staff indicated it would develop a description of how the exhaust dates
3 were developed and place them on the Commission's web site the
4 following week. To date, that information has not been placed on the
5 web site.

6

7 Q. DOES BELLSOUTH HAVE ANY INFORMATION AS TO WHAT
8 NUMBER CONSERVATION MEASURES THE STAFF CONSIDERED
9 WHEN DETERMINING SOME OF THE EXHAUST DATES FOR THE
10 STAFF DEVELOPED PLANS?

11

12 A. It is my understanding that staff did not consider any specific number
13 conservation measures when determining the exhaust dates for the
14 relief plans that indicate an extended life due to conservation
15 measures. The plans merely used NANPA's Assumption No. 2,
16 identified at the industry jeopardy meeting that the request for codes
17 from carriers needing number resources would decrease 50%. The
18 decrease could be due to a decrease in code requests or even
19 implementation of some form of number conservation measure.

20

21 Q. AS EXPRESSED BY THE PUBLIC WITNESSES AT THE SERVICE
22 HEARINGS, THE BIGGEST CONCERN WITH THE INDUSTRY'S
23 OVERLAY PROPOSALS IS THE REQUIREMENT TO IMPLEMENT
24 10-DIGIT DIALING FOR ALL LOCAL CALLS. FOR THE 954 AREA
25 CODE, WOULD THERE BE CONSIDERABLE 10-DIGIT DIALING

1 **REQUIRED IF A SPLIT RELIEF WAS IMPLEMENTED?**

2

3 **A. Yes. As shown on Exhibit SLG-1, all 954 relief plans currently being**
4 **considered by the FPSC would require implementation of considerable**
5 **10-digit dialing for local calls.**

6

7 **Q. THE PUBLIC WITNESSES AT THE 954 AREA CODE SERVICE**
8 **HEARINGS WERE IN FAVOR OF A SPLIT. WHAT WOULD BE THE**
9 **IMPACT ON CUSTOMERS IF THE COMMISSION IMPLEMENTED A**
10 **SPLIT IN THE 954 AREA CODE?**

11

12 **A. The 954 area code consists of five exchanges, all of which are located**
13 **within Broward County. As with any area code relief, the major impacts**
14 **to customers are the dialing patterns and number changes. Today, the**
15 **current dialing patterns implemented in the 954 area code are as**
16 **follows:**

17

- 18 • **IntraNPA local (including EAS) dialing - 7-digits**
- 19 • **InterNPA local (including EAS) dialing – 10-digits (except**
20 **between the 954 and 561 area codes which is dialed on a 7-digit**
21 **basis)**
- 22 • **ECS (all routes available to competition) dialing – 1+10 digit**

23

24 **Due to the small geographic nature of the 954 area code, these dialing**
25 **patterns have created confusion for customers on the correct dialing**

1 pattern for a specific call location, as well as routing problems when the
2 appropriate dialing patterns are not followed. In most cases when the
3 customer misdials a call, the customer will hear a recording to please
4 hang up and dial again. However, in the 954 area code there are
5 numerous instances where the misdial by the customer will have a
6 route that is valid within the routing tables. For example, if a customer
7 in Coral Springs wants to dial someone in Boca Raton, which is a 7-
8 digit dialed EAS call, and they dial 10 digits, the customer will be routed
9 to the 561 NXX in Ft. Lauderdale since in most cases interNPA is either
10 10 or 1+10 digits. If the FPSC requires the implementation of a split in
11 the 954 area code, BellSouth will have no option but to implement a
12 dialing delay of 4-6 seconds for most, if not all, switches in the 954 area
13 code. This delay would allow for the customer to complete their dialing
14 before the switch began to route the call.

15
16 As with any geographic split, approximately half of the customers would
17 be required to change their area code. Although this type of change
18 generally has little impact on a residential customer, business
19 customers usually have strong recognition with their full 10-digit
20 telephone number. In the past, businesses have been concerned with
21 the impact of having to change their telephone numbers.

22
23 BellSouth also believes implementation of any of the geographic split
24 plans would divide a major local calling scope within Broward County
25 and not provide any clear dividing line for the two area codes.

1 Therefore, BellSouth would continue to support Alternative 1 –
2 Distributed Overlay – for Broward County (954 NPA).

3

4 **Q. DID THE CUSTOMERS IN THE 561 SERVICE HEARINGS HAVE**
5 **SIMILAR CONCERNS AS THE CUSTOMERS IN THE 954 SERVICE**
6 **HEARINGS?**

7

8 **A. Yes. As discussed above, the customers in the 561 service hearing**
9 **expressed the same concern with having to dial 10-digits for all local**
10 **calls if the Commission implemented the industry proposed overlay.**

11

12 **The 561 area code consists of 15 exchanges that span four counties.**
13 **As shown on Exhibit SLG-1, any split plan implemented in the 561 area**
14 **code by the FPSC will require the implementation of numerous 10-digit**
15 **dialed local routes. Although, BellSouth does not believe the 561 area**
16 **code relief plans proposed exhibit the same technical problems as do**
17 **the 954 geographic split plans, BellSouth still supports Alternative 1, a**
18 **Distributed Overlay, for the 561 area code for five main reasons:**

19

- 20 **1. The impact to business customers;**
- 21 **2. The reduction of customer confusion associated with multiple**
22 **dialing patterns;**
- 23 **3. The inability to identify a split which would provide an**
24 **appropriate relief;**
- 25 **4. The violation of industry guidelines by other options; and**

1 5. The necessity to implement numerous 10-digit dialed routes for
2 any given split plan.

3

4 Q. IN THE 305/786 SERVICE HEARINGS, THE PUBLIC WITNESSES
5 EXPRESSED CONCERN WITH THE IMPLEMENTATION OF AN
6 OVERLAY IN THE KEYS AREA AND RECOMMENDED THE FPSC
7 IMPLEMENT RCC AND NUMBER POOLING. DOES THE
8 COMMISSION HAVE THE AUTHORITY TO IMPLEMENT EITHER OF
9 THESE NUMBER CONSERVATION MEASURES IN THE KEYS?

10

11 A. Although I am not an attorney, I do not believe the FPSC has the ability
12 to implement either number conservation measure in the Keys. As
13 discussed above, the Florida Statutes appear to limit the
14 implementation of RCC for a price regulated company. As for number
15 pooling, the authority delegated to the FPSC by the FCC only grants
16 the Commission the authority to implement pooling within an
17 Metropolitan Statistical Area (MSA). Since the Florida Keys are not
18 within an MSA, I do not believe the FPSC has the authority to require
19 carriers to implement number pooling in the Keys.

20

21 Q. IN THE 305/786 SERVICE HEARINGS, THE PUBLIC WITNESSES
22 EXPRESSED THEIR CONCERN WITH THE IMPLEMENTATION OF
23 AN OVERLAY FOR THE KEYS AND BELIEVED THE FPSC SHOULD
24 IMPLEMENT A RELIEF PLAN THAT RETAINS 7-DIGIT DIALING. DO
25 ANY OF THE RELIEF PLANS PROVIDE AN APPROPRIATE RELIEF

1 **PLAN AND RETAIN 7-DIGIT DIALING FOR LOCAL CALLS?**

2

3 **A. No. The emphasis, however, should be on an appropriate relief plan.**
4 **As discussed by the witnesses at the service hearing, the Keys main**
5 **source of revenue is derived from the tourist industry. Generally,**
6 **businesses tied to the tourist industry rely heavily on their telephone**
7 **number for survival. Out of the 13 relief plans, all but Alternatives 1, 2,**
8 **and 12, some form of overlay relief plan, would require the customers**
9 **in the Keys to change their area code. If the FPSC approved**
10 **Alternatives 8, 9, 10, and 13, geographic splits that use numbers from**
11 **an area code other than 305, customers would not only have to**
12 **change their area code but also would require an entire 10-digit**
13 **telephone number, due to code conflicts in the other area codes that**
14 **would provide relief to the Keys. As pointed out in the earlier**
15 **discussions, the impact to business customers is considerable greater**
16 **than they are to residential customers.**

17

18 **In addition to the adverse impact to businesses, the implementation of**
19 **Alternatives 5 and 6, geographic splits with a difference in the**
20 **forecasted life of greater than 15 years, would violate the industry**
21 **guidelines. BellSouth also believe that Alternative 7, a split and double**
22 **expanded overlay, would be extremely confusing for consumers in**
23 **Dade County and the adverse impact of in Dade County would offset**
24 **the benefit realized in the Keys.**

25

1 Therefore, BellSouth still believes an overlay is the best relief
2 alternative to implement in the Keys. Alternative 12, which is the
3 expanded overlay, simply makes the most sense.

4

5 **Q. DID THE CUSTOMERS IN THE 904 SERVICE HEARINGS HAVE THE**
6 **SAME CONCERNS AS CUSTOMERS IN THE OTHER SERVICE**
7 **HEARINGS?**

8

9 **A. Yes. As pointed in earlier discussions, the customers in the 904**
10 **service hearings expressed the same concern with implementation of**
11 **the 10-digit local dialing that is associated with an overlay. As shown**
12 **on Exhibit SLG-1, any of the split proposals would require**
13 **implementation of 10-digit dialing on numerous local routes. Although,**
14 **BellSouth generally believes customer confusion associated with an**
15 **overlay is less and business customers are better off if an overlay is**
16 **implemented, the geographic size of the 904 area code lends itself to**
17 **implementation of some type of split proposal.**

18

19 **If the FPSC believed a geographic split was appropriate, BellSouth**
20 **would propose the Commission implement Alternative 6, a geographic**
21 **split that encompasses Nassau, Duval, Clay and St. Johns counties in**
22 **a single area code. Based on the testimony at the service hearings,**
23 **this proposal appears to retain together the areas that expressed a**
24 **strong community of interest.**

25

1 Q. IN THE 904 SERVICE HEARINGS, THE VOLUSIA COUNTY
2 CONTINGENCY PROPOSED TO MOVE THE DEBARY EXCHANGE
3 AND OSTEEN FROM THE 407 AREA CODE INTO THE AREA CODE
4 FOR THE REST OF VOLUSIA COUNTY. WHAT ARE BELL SOUTH'S
5 CONCERNS WITH VOLUSIA COUNTY'S PROPOSAL?

6

7 A. BellSouth would agree to move the DeBary exchange to the Volusia
8 County area code, provided that is what the customers want. The
9 FPSC should be aware that, depending on how the Commission
10 provides relief to the 904 area code, there could be some code conflicts
11 with the NXXs assigned in the DeBary exchange. If that is the case,
12 then the customers in DeBary would need to make a full 10-digit
13 number change.

14

15 The Commission is well aware that BellSouth and Sprint worked with
16 the Volusia County government to develop a proposal for the Osteen
17 area in an attempt to position the area to join a Volusia County area
18 code. The Commission required BellSouth to ballot the customers in
19 the affected area. The ballot for moving the Osteen area failed for lack
20 of response to the ballot. BellSouth has no reason to believe that a
21 second ballot would pass based on the last ballot results and the fact
22 that the customers in the Osteen area would have to make a full
23 number change. BellSouth does not believe it is appropriate for the
24 FPSC to require BellSouth to ballot these customers again. Sprint and
25 BellSouth did everything possible, including a offer to implement EAS

1 between Osteen and Orange City, to assist the county in their efforts.
2 However, given all of the efforts of Volusia County, Sprint and
3 BellSouth, the ballot failed.

4

5 Q. ON PAGE 3 OF VOLUSIA COUNTY COMMISSIONER WAYNE
6 GARDNER'S DIRECT TESTIMONY, THE COMMISSIONER STATES
7 THAT HE WOULD LIKE TO SEE ESSENTIALLY COUNTY-WIDE
8 CALLING. DOES THE FPSC HAVE AUTHORITY TO IMPLEMENT
9 COUNTY-WIDE CALLING?

10

11 A. Considering the FPSC's recognition of the extent of its jurisdiction over
12 such activity, BellSouth does not believe the Commission has any
13 authority to require price regulated companies to implement expanded
14 calling unless the company agrees to do so.

15

16 Q. SEVERAL WITNESSES STATED THAT THE COMMISSION SHOULD
17 IMPLEMENT THE APPROVED AREA CODE RELIEF AS SOON AS
18 POSSIBLE. DO YOU AGREE WITH THIS PROPOSAL?

19

20 A. Due to the number of area code reliefs being considered in the
21 consolidated hearing and the uncertainty of the potential impact of any
22 number conservation measure implemented in the various area codes,
23 BellSouth recommends that the FPSC coordinate with the Industry and
24 NANPA when establishing the permissive and mandatory dialing periods.
25 There are limitations on how many NPAs can be converted at once.

1 BellSouth believes it may be beneficial to establish an implementation
2 meeting in the future to set the specific permissive and mandatory
3 dialing periods once the imminent exhaust is determined.

4

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

6

7 **A. Yes.**

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DIRECT TESTIMONY OF LENNIE FULWOOD

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Q. PLEASE STATE YOUR NAME AND ADDRESS

A. My name is Lennie Fulwood. My business address is 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Florida Public Service Commission as an Engineer in the Division of Competitive Services.

Q. PLEASE DESCRIBE YOUR POSITION, EDUCATION, AND WORK EXPERIENCE

A. I am an Engineer II in the Numbering and Tariff Section. I received my Bachelor of Science degree in Electrical Engineering from Florida Agriculture and Mechanical University in 1993. I worked as Engineer Property Supervisor at the Marriott Hotel in Tallahassee, FL for four years. Subsequently, I began working for the Florida Public Service Commission on March 25, 1998. Over the last two years, I have worked on various issues related to the telecommunications industry, such as service evaluation, numbering, tariff issues, and interconnection agreements.

Q. HAVE YOU EVER TESTIFIED BEFORE THIS COMMISSION?

A. No. However, I have testified on behalf of the Florida Public Service Commission before the Florida Division of Administrative Hearings, regarding Commission Docket No. 990861-TL, In re: Complaint of Calvin "Bill" Wood against GTE Florida Incorporated regarding service.

1 A. The purpose of my testimony is to provide information on
2 various area code relief alternatives proposed by Commission
3 staff, and to discuss the assumptions used in the calculation of
4 exhaust dates for those relief alternatives. Along with my
5 testimony, I am sponsoring Exhibits LF-1, LF-2, LF-3, LF-4, and
6 LF-5.

7 **Q. WOULD YOU PLEASE DESCRIBE THOSE EXHIBITS?**

8 A. Exhibit LF-1 describes the assumptions underlying the
9 exhaust date calculations, and has a table that illustrates how
10 exhaust dates are calculated. Exhibits LF-2, LF-3, LF-4, and LF-
11 5 are the area code relief alternatives for area codes 305/786,
12 561, 954, and 904 respectively. In Exhibit LF-2 through LF-5,
13 the last numbered alternative indicates the total number of
14 alternatives for that area; however, the Exhibits only set forth
15 the actual plans proposed by staff.

16 **Q. COULD YOU PLEASE STATE THE TOTAL NUMBER OF PROPOSED**
17 **ALTERNATIVES FOR AREA CODE RELIEF IN THE**

18 **A) 305/786 AREA CODES,**

19 **B) 561 AREA CODE,**

20 **C) 954 AREA CODE, AND**

21 **D) 904 AREA CODE.**

22 A. A) 13 (See Exhibit LF-2)

23 B) 12 (See Exhibit LF-3)

24 C) 4 (See Exhibit LF-4)

25 D) 17 (See Exhibit LF-5)

- 1 Q. COULD YOU PLEASE STATE THE TOTAL NUMBER OF STAFF'S
2 ALTERNATIVES FOR AREA CODE RELIEF IN THE
3 A) 305/786 AREA CODES,
4 B) 561 AREA CODE,
5 C) 954 AREA CODE,
6 D) 904 AREA CODE.
- 7 A. A) 8 (See Exhibit LF-2 Alternatives #6-13)
8 B) 7 (See Exhibit LF-3 Alternatives #6-12)
9 C) 2 (See Exhibit LF-4 Alternatives #3,#4)
10 D) 11 (See Exhibit LF-5 Alternatives #7-17)
- 11 Q. WHICH ALTERNATIVE WAS RECOMMENDED BY THE INDUSTRY TO THE
12 FLORIDA PUBLIC SERVICE COMMISSION IN THE
13 A) 305/786 AREA CODES,
14 B) 561 AREA CODE,
15 C) 954 AREA CODE, AND
16 D) 904 AREA CODE?
- 17 A. A) Alternative #1 (Overlay)
18 B) Alternative #1 (Overlay)
19 C) Alternative #1 (Overlay)
20 D) Alternative #1 (Overlay)
- 21 Q. WOULD YOU DESCRIBE AN OVERLAY?
22 A. An overlay is the process of assigning a new area code to a
23 geographic area where another area code is already in existence.
24 In an overlay, all new local telephone numbers in the geographic
25 area will be assigned to the new area code once available numbers

1 | are exhausted in the old area code, and 10-digit dialing (area
2 | code + seven-digit phone number) is required for all local calls.

3 | **Q. WHAT ASSUMPTIONS ARE MADE REGARDING HOW THE YEARS TO EXHAUST**
4 | **ARE CALCULATED?**

5 | A. As set forth in Exhibit LF-1, there are two assumptions in
6 | calculating the exhaust years or dates for all the alternatives.
7 | Assumption #1 is that code growth continues at the same rate from
8 | the second quarter of 1999 to the fourth quarter of 2001 levels.
9 | Assumption #2 is that code growth is reduced by 50 percent beyond
10 | the fourth quarter of 2001. These assumptions are the same
11 | assumptions that the North American Numbering Plan Administrator
12 | (NANPA) uses in calculating the exhaust dates and years.

13 | **Q. DID THE INDUSTRY USE THESE ASSUMPTIONS WHEN CALCULATING**
14 | **EXHAUST DATES IN THEIR ALTERNATIVES?**

15 | A. Yes.

16 | **Q. DID STAFF USE THE SAME ASSUMPTIONS WHEN CALCULATING EXHAUST**
17 | **DATES IN THEIR ALTERNATIVES?**

18 | A. Yes.

19 | **Q. IN YOUR OPINION ARE THESE ASSUMPTIONS ACCURATE, AND IF SO,**
20 | **ARE THE EXHAUST DATES ACCURATE?**

21 | A. No, because the assumptions use linear arithmetic.

22 | **Q. IF THE ASSUMPTIONS ARE INACCURATE, WHY DID STAFF USE THESE**
23 | **ASSUMPTIONS WHEN CALCULATING EXHAUST DATES FOR STAFF'S PROPOSED**
24 | **ALTERNATIVES FOR AREA CODE RELIEF?**

25 | A. Staff used these assumptions because they are the same

1 | assumptions NANPA used when calculating its exhaust dates.
2 | Further, staff is unaware of the existence of any other
3 | methodology or set of assumptions that would result in a more
4 | accurate exhaust date calculation.

5 | **Q. SHOULD THE COMMISSION APPROVE THE INDUSTRY'S CONSENSUS**
6 | **RELIEF PLANS FOR THE FOLLOWING AREA CODES:**

7 | **A) 305/786,**

8 | **B) 561,**

9 | **C) 954, AND**

10 | **D) 904?**

11 | **A. I have no position at this time.**

12 | **Q. IF THE COMMISSION DOES NOT APPROVE THE INDUSTRY'S**
13 | **RECOMMENDED ALTERNATIVES, ARE THERE ANY ALTERNATIVES THAT**
14 | **YOU WOULD RECOMMEND TO THE COMMISSION FOR THE**

15 | **A) 305/786 AREA CODES,**

16 | **B) 561 AREA CODE,**

17 | **C) 954 AREA CODE, AND**

18 | **D) 904 AREA CODE?**

19 | **A. Possible alternatives to the industry's consensus relief**
20 | **plan, beyond those offered by the industry, are set forth in**
21 | **Exhibits LF-2 through LF-5. All alternatives proposed in these**
22 | **dockets have their own advantages and disadvantages. The**
23 | **evidence will dictate the best alternative.**

24 | **Q. WOULD YOU RECOMMEND THAT THE COMMISSION IMPLEMENT NUMBER**
25 | **CONSERVATION MEASURES ALONG WITH AREA CODE RELIEF PLANS?**

1 A. Yes.

2 Q. WHAT NUMBER CONSERVATION MEASURE(S) SHOULD BE IMPLEMENTED
3 FOR THE FOLLOWING AREA CODES:

4 A) 305/786,

5 B) 561,

6 C) 954, AND

7 D) 904?

8 A. Any number conservation measures which will increase the
9 efficiency of how numbers are used would be acceptable.

10 Q. IF NUMBER CONSERVATION MEASURES ARE TO BE IMPLEMENTED, WHEN
11 SHOULD THEY BE IMPLEMENTED?

12 A. It depends on the type of number conservation measures(s)
13 approved, but as soon as possible.

14 DOES THIS CONCLUDE YOUR TESTIMONY?

15 A. Yes, it does.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO.: 990517-TL

Filed: April 21, 2000

**In Re: Request for review of proposed numbering
plan relief for the 904 area code**

April 21, 2000

COUNTY OF VOLUSIA

REBUTTAL TESTIMONY OF

JOHN E. EVANS

Q. Please state your name, business name, and title.

A. John E. Evans. I am chairman of the Volusia/Flagler Counties Task Force on Area Code formed by The Chamber, Daytona Beach/Halifax Area. The Chamber's address is 126 East Orange Avenue, Daytona Beach, Florida 32114.

Q. Please describe the responsibilities of your position.

A. I have been appointed chairman of the Volusia/Flagler Counties Task Force on Area Code by the Executive Committee of the Chamber. The Chamber has 1,400 members representing all phases of the

1 private economy of the Volusia/Flagler County area of over 500,000
2 people.

3

4 Q. What is the purpose of your testimony?

5

6 A. The purpose of my testimony is to rebut the direct testimony of
7 Thomas C. Foley on behalf of Lockheed Martin IMS and Daniel M.
8 Baeza of BellSouth Telecommunications, Inc. which speak to the
9 effect on customers of a split of the 904 area code.

10

11 Q. What effect would a split of the 904 area code resulting in a new area
12 code have on the members of your Chamber of Commerce?

13

14 A. For the larger part of our membership, it would have little or no effect.
15 Their customer base is within Volusia and Flagler Counties. Their
16 advertising copy and directory listings would remain the same 7 digit
17 telephone number. A review of local newspaper advertising and
18 yellow pages directory display advertisements indicates that most
19 businesses use 7 digit numbers in their advertising. Our members
20 who market outside the area, principally the hospitality industry, rely
21 heavily on the use of toll free (800, etc.) telephone numbers which
22 again will not change with the split to a new area code.

23

1 Q. Why is it important to your area to maintain a single area code?

2

3 A. We are a separate economic center from Jacksonville with a distinctly
4 different focus on tourism. Having our destination oriented customers
5 identify us by a distinct area code is quite important. The new area
6 code could have an important, positive advantage for marketing if it
7 were an onomatopoeic area code such as 386 (FUN).

8

9 Q. What effect would an overlay area code have on the business
10 community?

11

12 A. Our members have concluded it would have a negative effect on their
13 businesses and result in a diminution of the public's identity of our
14 distinction as a unique tourist destination. Further, the majority of
15 businesses would be required to incur the expense of revising
16 advertising copy to include the 10 digit telephone number.

17

18 Q. Does this conclude your testimony?

19

20 A. Yes.

21

22

23

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Greg Darnell, and my business address is 6 Concourse
3 Parkway, Suite 3200, Atlanta, Georgia, 30328.

4

5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by MCI WorldCom, Inc. as Regional Senior Manager --
7 Public Policy.

8

9 Q. HAVE YOU PREVIOUSLY TESTIFIED?

10 A. Yes, I have testified in proceedings before regulatory commissions in
11 Alabama, California, Florida, Georgia, Kentucky, Louisiana, North
12 Carolina, South Carolina and Tennessee and on numerous occasions
13 have filed comments before the FCC. Provided as Exhibit GJD-1 to
14 this testimony is a summary of my academic and professional
15 qualifications.

16

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

18 A. The purpose of this testimony is to provide MCI WorldCom's position
19 on how the Florida Public Service Commission ("FPSC") should utilize
20 its interim authority on number conservation measures delegated to
21 them by the Federal Communications Commission ("FCC").¹

¹ In the Matter of Florida Public Service Commission Petition to Federal Communications Commission for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, Order, CC Docket No. 96-98, FCC 99-249, released September 15, 1999 ("Florida Number Conservation Order").

1 **Q. WHAT AUTHORITY DID THE FCC DELEGATE TO THE FLORIDA PSC?**

2 **A. The FCC conditionally granted the Florida PSC the authority to**
3 **institute thousand-block pooling trials; reclaim unused and reserved**
4 **NXX codes, and portions of those codes; maintain rationing**
5 **procedures for six months following area code relief; set numbering**
6 **allocation standards; require the submission of utilization data from all**
7 **carriers; and implement NXX code sharing.**

8

9 **Q. WHAT HAPPENS TO FLORIDA PSC'S AUTHORITY AFTER THE FCC**
10 **ISSUES ITS NUMBERING RULES?**

11 **A. Assuming any actions taken by the Florida PSC under its delegated**
12 **authority are consistent with the rules that will be established by the**
13 **FCC in its Numbering Resource Optimization proceeding,² nothing**
14 **should happen. However, if actions taken by the Florida PSC turn out**
15 **to be inconsistent with the rules that will be established by the FCC,**
16 **such actions will be superseded.**

17

18 **Q. WHAT ARE MCI WORLDCOM'S RECOMMENDATIONS?**

19 **A. MCI WorldCom believes the FPSC's goal in this matter should be to do**
20 **what it can to preserve the shared resource of the North American**
21 **Numbering Plan (NANP) and ensure competitively neutral, efficient**
22 **number management. Any action proposed must be evaluated by how**

² See Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 99-122 (rel. June 2, 1999).

1 it works to realize this goal.

2

3 **Q. SHOULD THE FPSC RUN TWO PARALLEL PROCEEDINGS BOTH**
4 **ATTEMPTING TO ADDRESS NUMBER CONSERVATION MEASURES?**

5 A. No. The FPSC currently has two open proceedings that are addressing
6 the same number conservation measures. It is the recommendation of
7 MCI Worldcom that all number conservation measures from this docket
8 be consolidated into Florida PSC Docket No. 981444-TP.

9

10 **Q. WHAT IS THE PRIMARY CAUSE OF THE CURRENT NUMBERING**
11 **CRISIS?**

12 A. *It is critical to recognize that premature area code exhaust occurs*
13 *because of inefficiencies in the assignment and use of NXX codes and*
14 *is not caused by inefficiencies in the utilization of telephone numbers.*

15

16 **Q. WHAT INEFFICIENCIES ARE THERE IN THE ASSIGNMENT AND USE**
17 **OF NXX CODES?**

18 A. Instead of assigning telephone numbers to carriers as end users demand
19 new telephone numbers, the telephone industry has an arcane system
20 of requiring service providers to obtain numbers in blocks of full NXX
21 codes, or 10,000 numbers, in order to provide any service to areas
22 defined by "rate centers". Then once the NXX codes are obtained,
23 assignment of actual telephone numbers must wait on end user
24 demand. This NXX code per rate center requirement creates something

1 referred to as "footprint" demand because it establishes the geographic
2 area where the service provider can sell its services.

3

4 **Q. HOW IS FOOTPRINT DEMAND DIFFERENT THAN END USER**
5 **DEMAND?**

6 A. Footprint demand is the amount of numbers a telecommunications
7 service provider needs to provide any service to a specific area. That is
8 if a telecommunications service provider wants to provide any service in
9 a rate center, it needs a minimum of 10,000 numbers. If a local
10 exchange company wants to provide service in four rate centers, it
11 needs a minimum of 40,000 numbers, and so on. End user demand is
12 simply the number of telephone numbers demanded by end users.

13

14 **Q. WHY ARE FULL NXX CODES, OR 10,000 NUMBERS, CURRENTLY**
15 **REQUIRED TO PROVIDE ANY SERVICE IN EACH RATE CENTER?**

16 A. In today's public switched telephone network, each ten-digit telephone
17 number serves as a unique network address. At the same time, the
18 first six digits of each number, also known as the NPA-NXX, are used
19 for rating and routing of call to or, in some cases, from that network
20 address.³ The Local Exchange Routing Guide, or LERG, serves as the
21 central repository of rating and routing information for each NPA-NXX.
22 When a service provider obtains an NPA-NXX (i.e. a block of 10,000

³ Location Routing Number (LRN) technology, the technology that enables Local Number Portability (LNP), makes it possible to override the default routing which would otherwise occur based on the NPA-NXX.

1 numbers) from the Central Office Code administrator, it must activate
2 that code in the LERG. In doing so, the service provider must associate
3 that NPA-NXX with a particular geographic rate area. In turn, all service
4 providers, including local exchange carriers, interexchange carriers and
5 wireless carriers must periodically receive updated LERG information to
6 ensure the proper rating and routing of calls. Therefore, full NXX codes
7 are currently required because of the need to have calls delivered to the
8 correct location and billed correctly.

9

10 **Q. WHAT IMPACT DOES THE NXX CODE PER RATE CENTER**
11 **REQUIREMENT, OR FOOTPRINT DEMAND, HAVE ON NUMBER**
12 **EXHAUST?**

13 **A.** Because LECs require a full NPA-NXX (i.e. 10,000 numbers) in each
14 rate center just to begin offering service, the footprint demand created
15 by the advent of local competition has caused the current numbering
16 crisis. For example, each Alternative Local Exchange Company (ALEC)
17 that plans to serve customers in Pompano Beach, Coral Springs,
18 Deerfield Beach and Boca Raton will need 40,000 numbers to establish
19 its footprint as all these areas are in separate BellSouth rate centers. If
20 10 ALECs want to provide service to this area, they would require a
21 minimum of 400,000 numbers. This is true even though BellSouth is
22 currently providing service to the customers of this area with its own
23 blocks of NXX codes, the CLECs may not have any customers yet and
24 all of these cities are within a single 10-mile radius.

1 **Q. WHAT ARE RATE CENTERS?**

2 **A.** Rate centers are geographic locations used for the purpose of
3 establishing the distance between two points. Rate Centers are
4 typically specially identified ILEC central offices or tandems. Each rate
5 center is given a unique vertical and horizontal ("V&H") coordinate.
6 These V&H coordinates can be put through a mathematical calculation
7 to determine the distance between the two rate centers. This distance
8 is then used to determine the rate that should be applied to certain
9 types of calls.

10

11 **Q. HOW CAN THE FLORIDA PSC UTILIZE THE CONDITIONAL**
12 **AUTHORITY GRANTED TO IT BY THE FCC TO ADDRESS EXCESSIVE**
13 **FOOTPRINT DEMAND?**

14 **A.** There are two fundamental ways to address excessive footprint
15 demand. First, the number of rate centers can be reduced. This is
16 referred to as Rate Center Consolidation. Second, work can be done to
17 reduce the numbers required in each rate center. This is being
18 addressed by 1,000 block number pooling. Any "solution" to the
19 problem of premature area code exhaust that purports to improve a
20 carrier's or industry segment's low telephone number utilization without
21 addressing the inefficiencies in the assignment and use of NXX codes is
22 destined to fail.

23

24 **Q. HOW DOES RATE CENTER CONSOLIDATION WORK TO ENSURE**

1 **COMPETITIVELY NEUTRAL, EFFICIENT NUMBER MANAGEMENT?**

2 A. At a high level this is simple. The fewer the number of rate centers
3 there are in a given area, the less number of 10,000 blocks each
4 service provider needs to establish its footprint. However,
5 implementation can be much more complicated because consolidating
6 rate centers may have an impact on local calling areas, toll billing,
7 E911 call routing and intercarrier compensation mechanisms.
8 Customer notification and LERG updates are also issues that must be
9 addressed. As rate center consolidation is relevant only to carriers
10 that have multiple rate centers, this is primarily an ILEC issue. As
11 such, I believe the ILECs, working with the work group established by
12 this Commission in Docket No. 981444-TP, will provide a
13 comprehensive proposal on rate center consolidation.

14

15 **Q. HOW DOES 1,000 BLOCK NUMBER POOLING IMPROVE NUMBER**
16 **MANAGEMENT?**

17 A. With 1,000 block number pooling, instead of requiring a minimum of
18 10,000 numbers for each rate center, service providers only require a
19 minimum of 1,000 numbers for each rate center. So, the initial
20 efficiency gains are enormous. In the Pompano Beach, Coral Springs,
21 Deerfield Beach and Boca Raton rate center example described above,
22 the 10 ALECs would require 40,000 numbers instead of 400,000
23 numbers to establish their service area footprints and begin offering
24 service.

1 **Q. HOW DOES 1,000 BLOCK NUMBER POOLING WORK?**

2 **A** Thousands block number pooling requires Local Number Portability
3 (LNP) technology to be in place, which allows numbers to be moved
4 between switches. A pooling administrator is selected and that
5 pooling administrator works with all participants to determine a
6 timeline for implementation. The timeline consists of the following
7 steps: 1) each service provider must forecast the 1,000 block it will
8 request in the next 18 months; 2) a block protection date is
9 established by which service providers are required to protect 1,000
10 blocks of numbers from contamination (i.e. keep them unused so that
11 they can be returned in tact); 3) a block donation date is established;
12 4) an assessment is made by the Pool Administrator regarding the
13 size and potential lifespan of the planned number pool; and 5) blocks
14 of 1000 numbers are donated on the specified date. Service providers
15 may then start requesting from the pool administrator blocks of 1,000
16 numbers instead of 10,000 numbers to meet their numbering needs.
17 The pool administrator will then assign 1,000 blocks to the service
18 providers and the numbers are then ported to them for their use.

19

20 **Q. WHAT IS CURRENTLY BEING DONE TO IMPLEMENT 1,000 BLOCK**
21 **NUMBER POOLING?**

22 **A.** On October 29, 1999 the Southeast Limited Liability Corporation
23 approved Number Portability Administration Center (NPAC) version
24 3.0 software that will be used by all LNP capable carriers to

1 implement 1,000 block numbering pooling by the end of next year. It
2 is anticipated that Lockheed Martin will complete the software coding
3 of release 3.0 by June 30, 2000. Once coding is completed, industry
4 testing will begin. It is estimated that it will take the industry 4 to 6
5 months to complete testing. Industry groups are currently working to
6 finalize a test plan. MCI WorldCom is working hard to make sure all
7 of its internal systems affected by 1,000 block number pooling will be
8 ready for number pooling deployment. MCI WorldCom plans to be
9 ready to begin testing 1,000 block number using NPAC Version 3.0
10 software when testing begins in July of 2000.

11

12 **Q. HOW DOES NPAC VERSION 3.0 SOFTWARE MAKE 1,000 BLOCK**
13 **POOLING POSSIBLE IN MULTIPLE AREA CODES?**

14 **A. NPAC software version 3.0 was developed to implement the lessons**
15 **learned from a 1,000 block pooling trial that was conducted in the**
16 **Chicago, Illinois area. NPAC 3.0 software utilizes efficient data**
17 **representation ("EDR") which enables service providers to handle**
18 **pooled 1,000 blocks as one record. By treating 1,000 blocks as one**
19 **record, EDR minimizes potential network reliability problems and**
20 **implementation costs.**

21

22 **Q. WHAT CAN THE FLORIDA PSC DO TO ENSURE 1,000 BLOCK**
23 **NUMBER POOLING IS IMPLEMENTED AS SOON AS POSSIBLE?**

24 **A. The Florida PSC should oversee the NPAC version 3.0 software**

1 deployment schedules of LNP capable carriers to ensure everything is
2 being done to implement 1,000 block number pooling as quickly as
3 possible without imposing any undue risk on network reliability.

4

5 **Q. DOES 1,000 BLOCK NUMBER POOLING IMPOSE A RISK ON**
6 **NETWORK RELIABILITY?**

7 A. Yes. As I explained before, currently, call routing and billing is done
8 based on each carrier having a full NXX code in each rate center.
9 1,000 block number pooling changes this association. Anytime a
10 change is imposed on the complex telecommunications network, there
11 is a potential impact on network reliability. The industry has
12 developed NPAC version 3.0 software to help manage this risk.

13

14 **Q. HOW SHOULD 1,000 BLOCK POOLING COSTS BE RECOVERED?**

15 A. Section 251(e)(2) of the Telecommunication Act⁴ and paragraph 17 of
16 the FCC's Florida Number Conservation Order, requires costs to be
17 recovered on a competitively neutral manner. 1,000 block number
18 pooling is based on Local Number Portability (LNP) architecture. It is
19 therefore logical that the cost categories of 1,000 block pooling to be
20 similar to those used for LNP. The FCC has identified three categories
21 of costs for 1,000 block pooling administration: 1) costs incurred by
22 the industry as a whole, such as NANP administrator costs, OSS

⁴ 47 U.S.C. § 251(e)(2).

1 enhancements and operations support⁵ to the existing NPAC; 2)
 2 carrier-specific costs directly related to 1,000 block pooling
 3 implementation, such as enhancements to carriers' SCP and OSS
 4 systems; and 3) carrier specific costs not directly related to 1,000
 5 block pooling implementation. Category 1 costs should be allocated
 6 among all telecommunications carriers and recovered based on gross
 7 revenues net of payments to other telecommunications service
 8 providers. Category 2 costs should be recovered in the lawful manner
 9 prescribed by this Commission. In LNP, ILECs recovered carrier-
 10 specific LNP directly incurred costs via end user surcharges. Category
 11 3 costs are not subject to the section 251(e)(2) requirement of being
 12 borne by all carriers. As such, no special provisions are necessary for
 13 carriers to recover these costs.

14

15 **Q. HOW SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY**
 16 **TO RECLAIM UNUSED AND RESERVIED NXX CODES AND PORTION**
 17 **OF THOSE CODES?**

18 **A.** The industry has established strict guidelines for NXX code
 19 reclamation and NXX code reservation. The Commission should
 20 ensure Lockheed Martin in its current role of Numbering Administrator
 21 is effectively implementing these guidelines.

22

23 **Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY TO**

⁵ Costs to interact with the pool administrator and to process/broadcast data blocks.

1 **MAINTAIN RATIONING PROCEDURES FOR SIX MONTHS**
2 **FOLLOWING AREA CODE RELIEF?**

3 A. No. Maintaining rationing procedures after area code relief has been
4 implemented is not beneficial. Some believe that by continuing
5 rationing procedures for six months after area code relief is
6 implemented, the life of the new area code can be extended.
7 However, maintaining rationing procedures after area code relief is
8 implemented creates pent up demand for telephone numbers that will
9 be realized. As such, the longer rationing procedures are in place the
10 greater this pent up demand will become. Further, rationing
11 procedures inhibit the development of local competition as new
12 entrants may be unable to obtain numbers they need for market entry.
13 As such, rationing procedures should not be used if at all possible.

14
15 **Q. SHOULD THE FLORIDA PSC SET NUMBERING ALLOCATION**
16 **STANDARDS?**

17 A. The current industry "months-to-exhausts" process administered by
18 Lockheed Martin effectively manages the utilization of telephone
19 numbers. No modification to these standards is necessary. The
20 Florida PSC must once again keep in mind the current numbering crisis
21 is caused by *inefficiencies in the assignment and use of NXX codes*
22 *and is not caused by inefficiencies in the utilization of telephone*
23 *numbers*. Modification of the current number allocation standards
24 would be an attempt to address a perceived inefficiency in the

1 utilization of telephone numbers. However, there is no information that
2 shows this perceived inefficiency is real and further, there is no
3 information that shows growth code requests are a substantial factor in
4 NPA exhaust. Modification of the current number allocation standards
5 would fail to address the problem, i.e. the inefficiency in the assignment
6 and use of NXX codes. As such, since the current numbering allocation
7 standards are not broken, there is no reason to fix them.

8

9 **Q. SHOULD THE COMMISSION IMPOSE FILL RATE REQUIREMENTS IN**
10 **PLACE OF THE CURRENT PRACTICE ON "MONTHS TO EXHAUST"**
11 **FOR GROWTH CODES?**

12 **A.** No. Establishment of a fixed percentage for fill rates is arbitrary.
13 Utilization cannot be considered in a vacuum. Eighty percent fill rate
14 for one service provider may bear no relation to 80% fill rate of
15 another service provider. Any arbitrary fill rate will fail to address the
16 fact that numbering demand does not always come in a nice even
17 stream of customers. At certain times, numbering demand can come
18 in very large amounts. At other times, a service provider's numbering
19 demand may actually be declining. Utilization must be placed in the
20 appropriate context by examining anticipated change in numbering
21 demand. As such, the forecasted month-to-exhaust process currently
22 in place is the best way to effectively manage number utilization.

23

24 **Q. IS ANYTHING BEING DONE TO IMPROVE NUMBER UTILIZATION?**

1 A. Yes. MCI WorldCom does support the NRO recommendation for
2 federal guidelines to modify the number allocation process to add the
3 establishment of fees for numbers that are held in reserve status for
4 more than one year. Unless there are economic consequences for
5 doing so, carrier may elect to maintain unnecessarily large number
6 inventories in reserve status. In most cases, one year is a sufficiently
7 long period of time to reserve a number. It is appropriate that
8 reservations longer than one year carry some financial cost.

9

10 **Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY TO**
11 **REQUIRE THE SUBMISSION OF UTILIZATION DATA FROM ALL**
12 **CARRIERS?**

13 A. Utilization data is already required as part of the industry guidelines.
14 The Florida PSC should obtain data collected by Lockheed Martin,
15 ensure industry guidelines are being followed and evaluate whether
16 any changes are needed to the utilization data requirements.

17

18 **Q. WHAT CONSIDERATIONS SHOULD BE GIVEN TO DATA**
19 **COLLECTION?**

20 A. I understand the Florida PSC is participating in state coordination
21 group (SCG) conference calls for the purpose of sharing experience
22 and knowledge among state regulators on numbering issues.
23 Coordination of this type is of great importance. Data reporting
24 requirements could benefit from this type of coordination among the

1 states. There is a national need for ubiquity of data reporting.
2 Consistent data reporting between states will enable regulators to
3 conduct meaningful cross sectional analysis. Cross sectional analysis
4 of data should enable regulators to better understand the causes of
5 number demand and, as a result, better forecast number exhaust.
6 The SCG should work with the industry and the FCC in an attempt to
7 develop a single unified national reporting requirement and reporting
8 structure.

9

10 **Q. DOES MCI WORLDCOM BELIEVE ANY CHANGES ARE NEEDED TO**
11 **THE FLORIDA'S CURRENT UTILIZATION DATA REQUIREMENTS?**

12 **A.** No. However, modifications are currently being proposed to the
13 national Central Office Code Utilization Study (COCUS) reporting
14 requirements that if adopted should meet all of the numbering data
15 needs of the Florida PSC. The Florida PSC should comport any state
16 specific reporting requirements to any national rules that are
17 established.

18

19 **Q. SHOULD THE FLORIDA PSC USE ITS DELEGATED AUTHORITY AND**
20 **IMPLEMENT NXX CODE SHARING?**

21 **A.** Currently, no industry guidelines exist for NXX code sharing. As
22 such, there is nothing that can be implemented. The FPSC should
23 continue to work with the industry through the work groups it has
24 established in Docket No. 981444-TP to define code sharing and

1 determine whether it is a feasible method to conserve numbering
2 resources. If the Commission's NXX code sharing work group
3 determines code sharing is feasible it should submit a proposal so that
4 industry guidelines can be considered.

5

6 **Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT TESTIMONY?**

7 **A. Yes.**

- 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, 2000.¹ 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

21 ¹ 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,² 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.

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

SANDRA A. KHAZRAEE

Q. Please state your name and business address.

A. My name is Sandra A. Khazraee. My business address is Sprint, 1313 Blair Stone Road, Tallahassee, Florida 32301.

Q. By whom are you employed, and what are your current responsibilities.

A. I am employed by Sprint United Management Corporation as Regulatory Manager. My current responsibilities include coordinating responses to FPSC data requests and interrogatories and ensuring compliance with FPSC orders. I interface regularly with Sprint employees at all levels within the company to carry out my job responsibilities.

Q. What is the purpose of your testimony?

1 A. The purpose of my testimony is to address how specific
2 alternatives for relief to the 904 NPA will impact Sprint and
3 Sprint's customers.

4

5 Q. What is Sprint's position regarding the best long-term relief
6 option for the 904 NPA?

7

8 A. For the reasons discussed in the minutes of the June 30, 1999,
9 904 NPA Relief Planning Industry Meeting, Sprint's position is that
10 the distributed overlay is the best long-term plan for relief of
11 the 904 NPA.

12

13 Q. If the Commission only considers geographic split alternatives,
14 among the NPA split alternatives discussed for the 904 NPA, which
15 alternatives does Sprint have concerns with and why?

16

17 A. Alternatives 4, 6 and 16B cause Sprint concerns because they
18 recommend an NPA split between Bradford and Clay counties. Sprint
19 has four exchanges in the 904 NPA and three of those four are in
20 Bradford and Clay counties. The Lawtey exchange is located in
21 Bradford County and the Kingsley Lake exchange is located in Clay
22 County. The Starke exchange is located predominantly in Bradford
23 County but a small portion of the exchange is in Clay County. If
24 Alternative 4, 6 or 16B are ordered by the Commission as a relief
25 plan, then the NPA boundary would be the Bradford/Clay county line;

1 thus the Kingsley Lake exchange and a portion of the Starke
2 exchange would be in one NPA while Lawtey and the majority of
3 Starke exchanges would be in a different NPA.

4
5 Q. How would a split along the Bradford/Clay county line affect
6 Sprint's customers in the Kingsley Lake, Starke and Lawtey
7 exchanges?

8
9 A. Kingsley Lake currently has seven-digit local dialing to the
10 nearby communities of Starke, Lawtey and Raiford. If Alternative 4,
11 6 or 16B were implemented, then those customers in Kingsley Lake
12 would be required to dial ten digits to call Starke, Lawtey and
13 Raiford customers. Likewise, customers in Starke, Lawtey and
14 Raiford would be required to dial ten digits to call Kingsley Lake
15 customers. While it is true that in an overlay, all of these calls
16 would also have to be dialed with ten digits, when an NPA is split,
17 customers expect that at least they will maintain seven-digit local
18 dialing. This is especially true where there is a high level of
19 community of interest such as the community of interest between
20 Kingsley Lake and the Lawtey, Raiford and Starke communities.

21
22 Q. Is there another reason why the split should be along the
23 Bradford/Clay county boundary?

1 A. Yes. The 964 NXX in Starke serves Starke customers in both
2 Bradford and Clay counties. An NPA split between the two counties
3 will cause confusion among Starke customers because approximately
4 70 Starke customers will have one NPA while the remaining 7,400
5 will have a different NPA although they will maintain the same NXX.
6 Sprint recommends that the split not be Alternatives 4, 6 or 16B.
7 And, if one of these alternatives were selected, the split not
8 follow the county boundary but rather the exchange boundary between
9 the Starke and Kingsley Lake exchanges. Sprint understands that
10 the Commission has historically avoided drawing an NPA line through
11 an exchange boundary.
12

13 Q. How will an NPA split along the Bradford/Clay county line affect
14 Sprint in the Kingsley Lake, Starke and Lawtey exchanges?
15

16 A. If Kingsley Lake, which is a remote office hosted by the Starke
17 DMS-10 switch, is placed in an NPA different from Starke, then new
18 911 trunks will be needed to properly identify the new NPA to PSAPs
19 from customers that are in Clay County but are being served from a
20 Starke NXX. Also, with two NPAs in the Starke office, an additional
21 home NPA translation table and associated data would have to be
22 created and maintained in the Starke central office. The Starke
23 central office would require additional software packages as well
24 as additional switch memory. Having two NPAs in the Starke office
25 would also require additional operator trunk groups from Starke to

1 Sprint's Tallahassee operator group as well as between Tallahassee
2 and AT&T and Starke and AT&T. These problems can be avoided if the
3 Commission avoids drawing any NPA line east of the westernmost
4 Starke, Kingsley Lake and Lawtey boundaries within the Sprint
5 service territory. Sprint does not believe that the Commission has
6 heard any evidence in this proceeding that demonstrates that
7 locating the NPA boundary strictly along the county line will
8 outweigh the cost and inconvenience imposed on customers and
9 companies.

10

11 Q. Does that conclude your testimony?

12

13 A. Yes, it does.

1 COMMISSIONER DEASON: Now we will go through the
2 process of identifying the exhibits which are attached to
3 those separate sets of prefiled testimony. And I believe
4 the exhibits also are listed in the prehearing order
5 beginning on Page 26, is that correct?

6 MS. KEATING: That's correct.

7 COMMISSIONER DEASON: Okay. So let's go through
8 the process of identifying those exhibits. I believe the
9 next exhibit number is Exhibit 9, is that correct?

10 MS. KEATING: That's correct.

11 COMMISSIONER DEASON: Okay. What we will do
12 then is the prefiled exhibits for Mr. Foley, which have
13 been identified as TCF-1 through 3, that will be Composite
14 Exhibit Number 9.

15 The prefiled exhibits attached to the prefiled
16 testimony of Witness Gardner will be Exhibit 10.

17 The exhibits attached to the prefiled testimony
18 of Mr. Weiss will be 11.

19 Mr. Evans will be 12.

20 Ms. Eudy will be 13.

21 Mr. Darnell will be 14.

22 Mr. Greer, 15.

23 Witness Fulwood will be Composite Exhibit 16.

24 And are there any other exhibits associated with
25 prefiled testimony that we need to identify?

1 MS. KEATING: Commissioner, I do just want to
2 point out that Mr. Fulwood's exhibits should include the
3 corrections to Exhibits LF-3 and LF-5 that were filed on
4 May 12th.

5 COMMISSIONER DEASON: LF-3 and LF-5 corrections
6 that were filed on May the 12th are incorporated as part
7 of Composite Exhibit 16.

8 Any other exhibits which need to be identified
9 associated with prefiled testimony?

10 MS. BARICE: Mr. Commissioner, Carole Barice on
11 behalf of the City of Deltona. We have identified Wayne
12 Gardner's exhibit as Exhibit 10, and actually there is
13 two. There is a local telephone directory, that needs to
14 be corrected, and a resolution of the city commission. So
15 I would suggest perhaps that needs to be a Composite
16 Exhibit 10.

17 COMMISSIONER DEASON: That will be a composite,
18 and Exhibit 10 will encompass both of those described
19 items.

20 MS. BARICE: Thank you.

21 MR. GUMMEY: Mr. Chairman, this is Frank Gummey.
22 Unfortunately, I get an echo.

23 On Number 11, it says it is not prefiled. It
24 has been filed.

25 COMMISSIONER DEASON: Okay. It has been filed,

1 and it is a map, is that correct?

2 MR. GUMMEY: Correct.

3 COMMISSIONER DEASON: Okay. Well, that will be
4 identified as Exhibit 11.

5 MR. GUMMEY: Number 12 attached to Evans was not
6 prefiled. I have faxed a copy to Beth Keating.

7 COMMISSIONER DEASON: Ms. Keating, do you have
8 that?

9 MS. KEATING: Apparently somebody does, somebody
10 on staff does.

11 COMMISSIONER DEASON: We have that, then. And
12 it is County Resolution Number 2000-63, is that correct?

13 MR. GUMMEY: Correct. And I will serve the
14 parties and file the requisite number.

15 MS. KEATING: I believe we just received that
16 this morning. Yes, that is the resolution.

17 COMMISSIONER DEASON: Very well. That is the
18 resolution. And, Mr. Gummey, you are going to provide
19 copies of that to all the parties, correct?

20 MR. GUMMEY: Correct.

21 COMMISSIONER DEASON: Okay. And it is
22 identified as Exhibit Number 12.

23 MR. GUMMEY: Thank you.

24 COMMISSIONER DEASON: Any other exhibits or
25 clarifications on the exhibits?

1 MS. BARICE: Mr. Commissioner, we had, on behalf
2 of the City of Deltona, filed both of those exhibits, the
3 telephone directory and the resolution, just for
4 clarification purposes.

5 MS. KEATING: I believe all of those came in
6 after the prehearing, though.

7 COMMISSIONER DEASON: But we do have them now,
8 we know what they are?

9 MS. KEATING: We do have them now. We have them
10 now.

11 COMMISSIONER DEASON: Okay. Just so long as it
12 is clear for purposes of the record. All right. We have
13 all of the exhibits identified. We have already admitted
14 Exhibits 1 through 8. We need to address Exhibits 9
15 through 16.

16 Is there a motion to admit those exhibits?
17 Staff so moves, is that correct?

18 MS. KEATING: Staff moves all.

19 COMMISSIONER DEASON: Any objection for Exhibits
20 9 through 16? Hearing no objection, show then that
21 Exhibits 9 through 16 are admitted.

22 (Exhibit 9 through 16 marked for identification
23 and admitted into the record.)

24 COMMISSIONER DEASON: Any other matters?

25 MS. KEATING: None that staff is aware of. I

1 just wanted to point out that transcripts are due on May
2 26th with briefs due on June 23rd. And staff is scheduled
3 to file a recommendation on August 17th.

4 COMMISSIONER DEASON: Is this a regular agenda
5 conference or a special agenda conference?

6 MS. KEATING: Right now it is scheduled for a
7 regular agenda conference.

8 COMMISSIONER DEASON: And what is the date of
9 that?

10 MS. KEATING: August 29th.

11 COMMISSIONER DEASON: August 29th?

12 MS. KEATING: Uh-huh.

13 COMMISSIONER DEASON: Okay. Any other matters
14 by any of the parties? Hearing nothing, just let me take
15 this opportunity to thank you all for your participation,
16 and for the level of cooperation in having this record
17 assembled in record time.

18 CHAIRMAN GARCIA: Commissioner Deason.

19 COMMISSIONER DEASON: Yes, Mr. Chairman.

20 CHAIRMAN GARCIA: I wanted to ask staff how the
21 area code selection is coming.

22 COMMISSIONER DEASON: Okay.

23 CHAIRMAN GARCIA: The actual number is what I am
24 talking about.

25 COMMISSIONER DEASON: You are talking about the

1 actual three digits?

2 CHAIRMAN GARCIA: Yes, that we have been trying
3 to work something out with Volusia County.

4 MS. KEATING: We are still working on that, Mr.
5 Chairman. We have talked to Ms. Barice and Mr. Gummey
6 about this issue.

7 CHAIRMAN GARCIA: Beth, all I am looking for is
8 something from Volusia's attorney saying that they are
9 pleased with where we are.

10 MR. GUMMEY: Yes. This is Frank Gummey. We met
11 with Levent Ileri, and we spoke on the telephone with Tom
12 Foley, and he indicated that 386 was reserved for Volusia
13 County. And that the only conflict was with, I believe, a
14 Sprint exchange, a cell exchange in Duval, Clay and St.
15 Johns.

16 CHAIRMAN GARCIA: Okay. Good.

17 Thank you, Mr. Chairman.

18 MR. REHWINKEL: Commissioner Deason, this is
19 Charles Rehwinkel with Sprint. This information is
20 something that Sprint would like the opportunity to
21 address in a post-hearing filing for consideration by the
22 Commission.

23 One of the -- and we discussed this some at the
24 prehearing conference, is that we would want to be able to
25 address whether the use of any particular NPA would create

1 operational difficulties. We certainly would be concerned
2 if there was a use of a code that would require customers
3 to actually change telephone numbers.

4 I don't know at this time whether a 386 NXX in
5 the Jacksonville area is operational or not, but it would
6 concern us if there was an action taken where because of
7 the timing of the receipt of the information by the
8 Commission, i.e., what Mr. Gummey just related, would
9 effect us and our opportunity to respond to it.

10 COMMISSIONER DEASON: How do you suggest that
11 you be allowed to proceed in that regard?

12 MR. REHWINKEL: I would hope that we would be
13 allowed to make a post-hearing submittal about whether and
14 to the extent of any operational problems for the
15 Commission to consider.

16 COMMISSIONER DEASON: Would that submittal take
17 the form of some type of testimony, or evidence, or is it
18 just something that is going to be briefed? I just need
19 to understand how we are going to proceed.

20 MR. REHWINKEL: Yes. I mean, this is a little
21 bit unusual. I'm not trying to overly introduce
22 procedural issues into the docket. I think we could do it
23 in the form of a letter, hopefully. If there were no
24 problems, we could relate that. If there were problems, I
25 mean, we can do it in the form of a letter, testimony or

1 an affidavit.

2 COMMISSIONER DEASON: Staff.

3 MS. KEATING: Well, I just have a suggestion.
4 To the extent that it contains factual information, we
5 could always have it marked as a late-filed hearing
6 exhibit. And it would be a part of the record, unless
7 somebody objects.

8 MR. REHWINKEL: That would certainly be okay
9 with Sprint.

10 MR. GUMMEY: Could I suggest -- this is Frank
11 Gummeey for Volusia County -- if we would be consulted
12 before this were filed, maybe we could avoid any conflict
13 on it.

14 COMMISSIONER DEASON: Mr. Rehwinkel, are you
15 willing to try to coordinate the submission of that filing
16 ahead of time with concerned parties?

17 MR. REHWINKEL: Yes. I guess my concern would
18 be if, you know, we had an operational problem that was
19 serious, I wouldn't want there to be an objection to it
20 being considered because it ran counter to someone else's
21 position. I don't know exactly what counsel for Volusia
22 has in mind as far as working with them, but certainly we
23 have and always will be cooperative in that respect.

24 MR. GUMMEY: Well, we are not urging that the
25 area code be used where there is a conflict with the NXX.

1 I wouldn't think there would be an operational problem.

2 MR. REHWINKEL: Yes, I agree. And I would be
3 happy to work with him. I'm sure that we can reach an
4 accommodation that would be satisfactory to both.

5 COMMISSIONER DEASON: Mr. Wahlen.

6 MR. WAHLEN: Mr. Commissioner, I'm not sure I
7 fully understand all of this, but it strikes me that
8 whatever new area code is selected could present these
9 kinds of conflicts for some or all of us.

10 And Mr. Rehwinkel's point is that we ought to
11 have a procedural mechanism for having the Commission
12 address that. My suggestion would be that once the relief
13 plans are decided, the Commission give the parties notice
14 of what numbers have been selected. And the parties
15 should have some opportunity to file an affidavit or an
16 objection setting forth procedural, operational, or other
17 problems so the Commission can consider those. I don't
18 know that it necessarily needs to take the form of a PAA
19 order, that might be a traditional way that the Commission
20 does it.

21 But the kinds of problems Mr. Rehwinkel is
22 pointing out as a potential could exist in other areas
23 throughout the state depending on which of these numbers
24 are selected. So I think it is an issue that is an
25 important one, maybe one we haven't looked at before. But

1 I think the Commission ought to tell us what number they
2 want to pick in a way so everybody has notice. All the
3 companies can look and see what sort of operational
4 problems that presents, whether any of their customers may
5 have to change numbers, and get that information back to
6 the Commission so the Commission can consider that as it
7 moves forward.

8 COMMISSIONER DEASON: Mr. Wahlen, that certainly
9 seems like a reasonable way to proceed, but I want to
10 throw it out to the parties to see if there is any
11 objection to that suggested process.

12 MR. SELF: Commissioner Deason, this is Floyd
13 Self. We would agree with the procedure. I think if you
14 look in the past as to how the Commission has done area
15 code relief, there is ultimately a recommendation for
16 whatever the relief plan is. And the area codes, the
17 actual numbers, to the extent that there is a new area
18 code involved, is something that generally tends to be an
19 administrative matter that falls out after the process.

20 We seem in this proceeding to be in the
21 situation where some of the parties are advocating, at
22 least at this point in time, apparently, a specific
23 number. And I'm not sure that there has been proper
24 notice of that, or really that that is an evidentiary
25 issue within the record. I haven't looked through all of

1 the documents yet.

2 CHAIRMAN GARCIA: Now, Mr. Self, I have to
3 correct you there. The area code has been an issue from
4 the onset. It has been an issue at all the customer
5 hearings. It has been an issue that this Commission in
6 all of these dockets tries to take consideration of the
7 issues that the communities have.

8 Now, we may not have filed the evidence, but I
9 know that there has been ample discussion about the
10 availability of numbers at the customer hearings.

11 MR. SELF: Well, I wasn't there, but you were,
12 Mr. Chairman, so I would have to defer to that. But I
13 think the procedure that we have talked about, whether the
14 Commission issues the actual number as a PAA or provides
15 some sort of --

16 COMMISSIONER DEASON: There needs to be some way
17 for parties to at least advise the Commission of potential
18 conflicts. And one of the most obvious ones is having
19 customers change telephone numbers. There needs to be
20 something at least presented for the Commission's
21 consideration in some manner. I think that is the
22 concern.

23 CHAIRMAN GARCIA: Right.

24 MR. SELF: Yes, sir.

25 COMMISSIONER DEASON: Staff.

1 MS. KEATING: Staff is open to the process
2 suggested by Mr. Wahlen.

3 COMMISSIONER DEASON: Is there any objection to
4 that process? Mr. Rehwinkel, you kind of raised this. Is
5 there any objection to the process suggested by Mr.
6 Wahlen?

7 MR. REHWINKEL: I think Mr. Wahlen's approach is
8 eminently satisfactory to us. We just in an abundance of
9 caution at this point would like to have the Commission an
10 opportunity to understand the ramifications. And that
11 would work for us.

12 COMMISSIONER DEASON: Mr. Gummey, are you
13 comfortable with this process?

14 MR. GUMMEY: Yes, I am.

15 COMMISSIONER DEASON: Very well.

16 MR. REHWINKEL: And I can assure you,
17 Commissioners, that were we to discover a material
18 conflict, we would endeavor to sit down with Volusia
19 County and anyone else and see what we could work out to
20 hopefully even avoid having to extend the process. So we
21 will commit that we will work with the parties on this.

22 COMMISSIONER DEASON: Very well.

23 CHAIRMAN GARCIA: Thank you, Commissioner
24 Deason.

25 COMMISSIONER DEASON: Yes. Anything else to

1 come before the Commission at this time?

2 MS. KEATING: Can I just clarify one thing?

3 COMMISSIONER DEASON: Please.

4 MS. KEATING: If we are going to follow the
5 process suggested by Mr. Wahlen, is this only in Docket
6 990517, the 904? I believe that is the only one we are
7 actually looking at a specific --

8 CHAIRMAN GARCIA: Well, Beth, let's make sure,
9 though, because right now one of the conflicts was within
10 904, wasn't it?

11 MS. KEATING: Right. I think that's what I'm
12 saying.

13 COMMISSIONER DEASON: Well, it could happen in
14 any of the area codes. I mean, the theory is that once --
15 if it is decided that a new area code is needed, and once
16 a selection is made, there are potential conflicts,
17 regardless of which area code it may be.

18 So I think we need to leave it open to wherever
19 such conflicts may arise that give the parties the ability
20 to at least advise the Commission of what those problems
21 are and the magnitude of those problems, or the
22 anticipated magnitude of those problems. So we won't
23 limit it at this point, but we do understand that there
24 may be some special concern, at least with 904.

25 Anything else?

1 COMMISSIONER JACOBS: Just briefly. I took the
2 tenor of the discussion to be that the effort would be to
3 work those operational problems out in advance of any kind
4 of a protest being filed.

5 MR. WAHLEN: I can tell you on behalf of ALLTEL
6 that we are not looking to have a problem here. We want
7 to try and work these things out. We don't want to cause
8 problems for our customers any more than the Commission
9 wants to cause problems for customers. And I think we
10 just need to have the information to deal with so we all
11 know what the problems are and try to avoid them.

12 COMMISSIONER DEASON: Very well. Sounds
13 reasonable. One last chance. The gavel is about to fall.

14 Hearing nothing, this hearing is adjourned.
15 Thank you all for your participation.

16 (The hearing concluded at 10:07 a.m.)
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STATE OF FLORIDA)

CERTIFICATE OF REPORTER

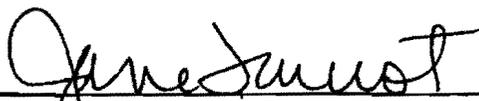
COUNTY OF LEON)

I, JANE FAUROT, RPR, Chief, FPSC Bureau of Reporting Official Commission Reporter, do hereby certify that the Hearing in Docket Nos. 990455, 990456, 990457 and 990517-TP was heard by the Florida Public Service Commission at the time and place herein stated.

It is further certified that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript, consisting of 128 pages, Volume 2, constitutes a true transcription of my notes of said proceedings and the insertion of the prescribed prefiled testimony of the witness(s) ..

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

DATED THIS 25TH DAY OF MAY, 2000.



JANE FAUROT, RPR
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