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June 23, 2000

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Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

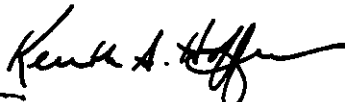
Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications ("Omnipoint"), now known as Voicestream Wireless, are the following documents:

1. Original and fifteen copies of Omnipoint's Posthearing Brief; and
2. A disk in Word Perfect 6.0 containing a copy of the Posthearing Brief.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Sincerely,



Kenneth A. Hoffman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Request for review of )  
proposed numbering plan relief )  
for the 305/786 area code - Dade )  
County and Monroe County/Keys )  
Region. )  
\_\_\_\_\_ )

Docket No. 990455-TL

In re: Request for review of )  
proposed numbering plan relief )  
for the 561 area code. )  
\_\_\_\_\_ )

Docket No. 990456-TL

In re: Request for review of )  
proposed numbering plan relief )  
for the 954 area code. )  
\_\_\_\_\_ )

Docket No. 990457-TL

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

Docket No. 990517-TL

Filed: June 23, 2000

**OMNIPPOINT'S POSTHEARING BRIEF**

Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications ("Omnipoint"), now known as Voicestream Wireless, by and through its undersigned counsel, and pursuant to Order No. PSC-99-2145-PCO-TL issued November 1, 1999, hereby files its Posthearing Brief in the above-referenced dockets.

**A. Basic Position**

Omnipoint is a personal communications service ("PCS") provider licensed by the Federal Communications Commission to operate in the State of Florida. Omnipoint began offering PCS in the South Florida area in March of 1998, and currently provides facilities-based wireless communications services in Monroe, Dade, Broward and Palm Beach Counties. Omnipoint is a

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current NXX codeholder in the 305, 954 and 561 area codes.

Omnipoint generally supports the use of an overlay for area code relief, including wireless only overlays. With an overlay, no existing customers, wireline or wireless, are required to change their area code or telephone number. Per the FCC's rules, any overlay must require 10-digit dialing between and within both the original and new area codes. For wireless carriers, which are not limited to assigning telephone numbers from within the customer's "home" rate center, the existing inventory of numbers can be efficiently utilized to meet new customer demand until the resources are depleted. From a networking perspective, overlays are easier to implement because there is no need to reprogram existing NXX switch translations.

Omnipoint also maintains that the availability of number resources will be optimized by consolidation of wireline rate centers which will reduce the demands on existing area codes by new entrants and will maximize the efficient utilization of existing numbering resources among existing carriers. Wireless carriers typically obtain numbering resources in approximately one out of ten rate centers and use this supply to serve customers throughout their serving area. Rate center consolidation would implement a similar method of number efficiency and conservation for wireline carriers.

**B. Issues of Fact, Law and Policy**

**Issue 1a: Should the Commission approve the industry's consensus relief plans for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

**Omnipoint: Omnipoint supports the industry's consensus relief plan for the 954 area code.**

Argument: As explained by witness Foley, industry meetings resulted in the presentation and consideration of two alternative relief plans. The industry reached consensus to eliminate Alternative 2 - - a geographic split bisecting the Ft. Lauderdale rate center - - because the split boundary line divided a rate center and would create confusing dialing patterns for end users. The industry reached consensus on Alternative 1 - - the distributed overlay - - which is projected to last 9.5 to 19.0 years, depending on the extent of NXX code conservation implementation. (Tr. 30-31).

The industry relief plan is preferable to the alternatives presented by staff witness Fulwood (Composite Ex. 16; LF-4). These alternatives involve geographic splits. As explained by witness Foley, with the proliferation of the use of numbering resources, continued geographic splits will result in a shrinkage of territory covered by the existing area code and increased interNPA dialing with surrounding areas on a 10-digit basis. An overlay stops the shrinkage and allows customers to maintain their existing telephone number. (Ex. 6; Deposition of Thomas Foley, at 11-12).

A geographic split would divide a major local calling scope within Broward County and not provide any clear dividing line for the two area codes. (Tr. 181). In addition to the inconvenience and expense imposed on business customers who must change numbers, stationery, advertisements and business cards which comes with any geographic split, a split presents the potential for significant customer confusion and misdials in Broward County by exacerbating the complexity of the following current dialing patterns: (a) intraNAPA local (including EAS) (7 digits); (b) interNPA local (including EAS) (7 digits); (c) ECS (10 digits); and (d) ECS with IXC competition (1 + 10 digits - - where technically feasible). (Tr. 180-181).

For these reasons, Omnipoint supports the industry consensus relief plan, Alternative 1 (distributed overlay), for area code relief for the 954 area code.

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

**A) 305/786**

**Omnipoint:** Omnipoint supports a relief plan for the 305/786 area codes which would implement an overlay, place priority on achieving a maximum exhaust period for Dade County over Monroe County, and include implementation of rate center consolidation. Of the alternatives presented, Staff Alternative 12 best meets these objectives.

**Argument:** Industry meetings produced five alternatives for area code relief for the 305/786 area codes. (Tr. 25-26). Staff witness Fulwood presented eight other possibilities, including combinations of splits, overlays and even the addition of two new area codes, in his testimony (Composite Ex. 16; LF-2). The industry consensus was for Alternative 1, an expanded overlay with a limited exhaust period projected to last 3.4 to 6.8 years. (Tr. 26). As previously noted, Omnipoint supports the implementation of an overlay but believes that the limited life span of the industry consensus plan is not the most optimal available option. Instead, Omnipoint requests the Commission to focus on Staff Alternative 12 - - an expanded overlay with mandatory implementation of number conservation measures including 1,000 number block pooling, reclamation of unused and reserved NXX codes, and rate center consolidation. (Composite Ex. 16; Ex. No. LF-2).

Alternative 12 would bring the previously discussed benefits of an overlay and avoid the continued disadvantages of a geographic split. Further, Alternative 12 would require aggression action on perhaps what is needed most - - implementation of number conservation measures, including rate center consolidation. The opportunity to implement rate center consolidation in the Monroe County would appear to be optimal due to the limited number of rate centers. Indeed,

BellSouth witness Greer acknowledged that BellSouth has generated data and information in response to Staff data requests and in connection with the rate center consolidation working group in Docket No. 981444-TP to implement rate center consolidation in Monroe County. (Ex. No. 8; Deposition of Stan Greer, at 47). BellSouth has given consideration to how it would collapse the seven existing rate centers in Monroe County into either two or three rate centers. The estimated annual revenue effect of consolidating the seven rate centers in Monroe County into one rate center is \$757,525, obviously a modest figure when compared with BellSouth's total annual revenues. (Ex. No. 3; BellSouth's responses to Staff's First Set of Interrogatories, Items 1-3). Finally, Alternative 12 would bring a projected exhaust period of 15.6 years across Dade and Monroe Counties.

For these reasons, Omnipoint supports the approval of Alternative 12, the expanded overlay with number conservation measures.

**B) 561**

Omnipoint: Omnipoint supports the relief plan outlined as Alternative 11 in Exhibit No. LF-3 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 561 area code.

Argument: Once again, the Commission is presented with numerous alternatives for area code relief. The industry relief meeting produced six alternatives with the industry supporting Alternative 1, a distributed overlay. (Tr. 28-29). Alternative 1 would cause minimal impact to business customers and minimize customer confusion associated with multiple dialing patterns. Moreover, Alternative 1 avoids detriments arising from some of the other options such as: (1) the inability to identify a split which would provide appropriate relief; (2) the violation of industry guidelines by other options; and (3) the necessity to implement numerous 10-digit dialed routes for the split options. (Tr. 182-183). As previously discussed, Omnipoint supports overlays and

Alternative 1 does forecast an exhaust period of 8.8 years. However, Alternative 11 is the better option as it presents the same overlay and mandates the implementation of number conservation measures. (Composite Ex. 16; Ex. LF-3). Staff witness Fulwood offered the un rebutted assumption that implementation of number conservation measures could as much as double the exhaust period for an area code relief plan beginning from the date of implementation of 1,000 number block pooling. (Composite Ex. 16; LF-1; Ex. 7, Deposition of Lennie Fulwood, at 12-13, 24, 32-33).

For these reasons, Omnipoint supports Alternative 11 for area code relief for the 561 area code.

**C) 954**

Omnipoint: Omnipoint supports the relief plan outlined as Alternative 3 in Exhibit No. LF-4 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 954 area code, in the event the Commission does not approve the industry consensus relief plan.

**D) 904**

Omnipoint: No position.

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

**A) 305/786**

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Dade and Monroe County areas.

Argument: The Commission has already mandated the implementation of specific number conservation measures for the 305/786 area code in Docket No. 981444-TP pursuant to interim authority granted by the FCC. These measures include reclamation of unused and reserved numbers, criteria to obtain initial numbering resources, thousand-block number management

requirements, and verification of carrier applications for numbering resources. See Order No. PSC-00-0543-PAA-TP issued March 16, 2000 in Docket No. 981444-TP. Notwithstanding whatever relief plan is determined by the Commission to be most appropriate for the 305/786 area code, Omnipoint requests that the Commission order BellSouth to aggressively pursue rate center consolidation in the 305/786 area codes, beginning with Monroe County. As previously discussed, Monroe County is a prime candidate for rate center consolidation and analysis of implementation of rate center consolidation in Monroe County has already been undertaken by BellSouth. The Commission is well aware of the immediate and obvious beneficial impacts of rate center consolidation, primarily in connection with new landline entrants, who require blocks of NXX codes to implement service - - the so-called "footprint" demand required by a new entrant to establish service in a specific rate center territory (Tr. 200-201). The FCC has already spoken to this issue, declaring "that rate center consolidation should be implemented to the greatest extent possible" as it is "a vitally important long-term to optimize the utilization of numbering resources." In the Matter of Numbering Resource Optimization, CC Docket No. 99-200 at par. 116 and 117.

Rate center consolidation would also bring benefits to wireless carriers. Since wireless carriers do not have numbering resources in every rate center, wireless customers are assigned telephone numbers with little or no relationship to the geographic locations where the customers actually live. While a wireless customer may live in the rate center associated with their assigned telephone number, it is more likely that they live in a nearby rate center where the wireless carrier has no numbering resources.

The "rate center disparity" arises because although any wireline customer's phone number may be ported to a wireless carrier, only those select wireless customers that happen to live in the



same rate center as their assigned wireless NXX may be ported to a wireline carrier. Since the requirement that numbers be ported only within rate centers is considered an underpinning to local number portability by the wireline segment of the industry, this problem has resisted resolution. The consolidation of rate centers will significantly increase the likelihood that a wireless customer will live in the same rate center as their assigned phone number and will be able to port their wireless numbers to a wireline carrier.

Further, rate center consolidation is the simplest manner for the reallocation of existing NXX codes. Unlike other conservation measures, rate center consolidation will cure much of the structural inefficiency that is built into the current numbering system. While rate consolidation will not create new numbering resources, it will reduce shortages by allowing carriers to distribute the numbers contained in an NXX code where they are needed, without reference or dedication to rate center geography within an NPA. This will permit carriers to better accommodate growth, and will also slow the depletion of unassigned numbers within an NPA by reducing demand. For example, if the seven rate centers in Monroe County were combined into a single service area, a carrier with seven existing, partially-filled NXX codes would now be able to provide 70,000 numbers to customers wherever the demand existed (as opposed to being allocated 10,000 numbers apiece in seven service areas, regardless of demand). Moreover, a new market entrant to this same service area will need only one NXX block of 10,000 numbers to initiate service, as opposed to obtaining a total of 70,000 numbers in seven areas to serve a minimal group of customers.

Omnipoint suggests that for purposes of this docket, that the Commission approve Alternative No. 12 for the 305/786 area codes which includes number conservation measures, and that issues concerning the Commission's authority to mandate rate center consolidation and the facts

concerning alleged lost revenues and costs associated therewith be developed within the framework of a separate docket, possibly Docket No. 981444-TP. Omnipoint recognizes that BellSouth has taken the position that the Commission lacks the authority to order BellSouth to implement rate center consolidation but that BellSouth may voluntarily implement rate center consolidation on a revenue and cost neutral basis. (Tr. 174). Omnipoint notes that BellSouth remains subject to rate caps for basic local telecommunications service under Section 364.051(2), Florida Statutes, but recognizes that BellSouth may petition for a rate increase if it believes and can demonstrate to the Commission that "circumstances have changed substantially" to justify an increase in the rates for basic local telecommunications services. See Section 364.051(5), Florida Statutes. The facts concerning alleged lost revenues and costs associated with implementation of rate center consolidation, which appear to be relatively minor for Monroe County, may be properly developed within the framework of a separate docket.

**B) 561**

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Palm Beach County and surrounding areas comprising the 561 area code.

Argument: Omnipoint adopts and incorporates its discussion under Issue 2(a) for the 305/786 area codes and further notes that the Commission has ordered the implementation of 1,000 number block pooling in the 561 area code effective February 5, 2001. See Order No. PSC-00-1046-PAA-TP issued May 30, 2000 in Docket No. 981444-TP (see Florida Code Holders Revised Number Pooling Implementation Plan for the 954, 561 and 904 NPAs attached to said order). Omnipoint supports implementation of rate center consolidation as part of its request that the Commission adopt Alternative 11 for area code relief for the 561 area code. Alternatively, should the Commission

determine that a relief plan other than Alternative 11 is appropriate for the 561 area code, Omnipoint requests that the Commission order the investigation and implementation of rate center consolidation in a separate docket, including Docket No. 981444-TP.

**C) 954**

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Broward County area comprising the 954 area code.

Argument: Omnipoint adopts and incorporates its discussion under Issue 2(a) for the 305/786 area codes and further notes that the Commission has ordered the implementation of 1,000 number block pooling in the 954 area code effective January 22, 2001. See Order No. PSC-00-1046-PAA-TP, supra. Omnipoint supports implementation of rate center consolidation as part of its request that the Commission adopt Alternative 11 for area code relief for the 561 area code. Alternatively, should the Commission determine that a relief plan other than Alternative 11 is appropriate for the 561 area code, Omnipoint requests that the Commission order the investigation and implementation of rate center consolidation in a separate docket, including Docket No. 981444-TP.

**D) 904**

Omnipoint: No position.

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

**A) 305/786**

Omnipoint: Rate center consolidation and other number conservation measures should be implemented as part of the 305/786 NPA relief plan, consistent with Staff Alternative 12 and the non-protested measures ordered in Order No. PSC-00-0543-PAA-TP.

Argument: Rate center consolidation and other number conservation measures should be implemented as part of the 305/786 NPA relief plan, consistent with Staff Alternative 12 and the non-protested measures ordered in Order No. PSC-00-0543-PAA-TP. If the Commission determines that another relief plan is appropriate, the Commission should order the investigation and implementation of rate center consolidation as soon as possible in a separate docket, including Docket No. 981444-TP, for the reasons previously discussed. Omnipoint adopts and incorporates by reference its previous discussion concerning the implementation of rate center consolidation.

**B) 561**

Omnipoint: Rate center consolidation and other number conservation measures should be implemented as part of the 561 NPA relief plan, consistent with Staff Alternative 11 and the non-protested measures ordered in Order No. PSC-00-0543-PAA-TP and Order No. PSC-00-1046-PAA-TP.

Argument: Rate center consolidation and other number conservation measures should be implemented as part of the 561 NPA relief plan, consistent with Staff Alternative 11 and the non-protested measures ordered in Order No. PSC-00-0543-PAA-TP and Order No. PSC-00-1046-PAA-TP. If the Commission determines that another relief plan is appropriate, the Commission should order the investigation and implementation of rate center consolidation as soon as possible in a separate docket, including Docket No. 981444-TP, for the reasons previously discussed. Omnipoint adopts and incorporates by reference its previous discussion concerning the implementation of rate center consolidation.

**C) 954**

Omnipoint: Rate center consolidation should be analyzed and implemented in the 954 area code (through a separate docket, together with the number conservation measures ordered in the non-protested portions of Order No. PSC-00-0543-PAA-TP and Order No. PSC-00-1046-PAA-TP.

Argument Rate center consolidation should be analyzed and implemented in the 954 area code (through a separate docket, together with the number conservation measures ordered in the non-protested portions of Order No. PSC-00-0543-PAA-TP and Order No. PSC-00-1046-PAA-TP. Omnipoint adopts and incorporates by reference its previous discussion concerning the implementation of rate center consolidation.

**D) 904**

Omnipoint: No position.

**Issue 3: What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

**A) 305/786**

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

Argument: Omnipoint supports 10-digit dialing for local and EAS calls consistent with the FCC's requirements for the implementation of an overlay (Tr. 168). 10-digit dialing also is appropriate for ECS calls unless there is IXC competition in which case 1+10-digit dialing is only appropriate if technically feasible. (Tr. 180-181).

**B) 561**

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

Argument: Omnipoint supports 10-digit dialing for local and EAS calls consistent with the FCC's requirements for the implementation of an overlay (Tr. 168). 10-digit dialing also is appropriate for ECS calls unless there is IXC competition in which case 1+10-digit dialing is only appropriate if technically feasible. (Tr. 180-181).

**C) 954**

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

Argument: Omnipoint supports 10-digit dialing for local and EAS calls consistent with the FCC's requirements for the implementation of an overlay (Tr. 168). 10-digit dialing also is appropriate for ECS calls unless there is IXC competition in which case 1+10-digit dialing is only appropriate if technically feasible. (Tr. 180-181).

**D) 904**

Omnipoint: No position.

**Issue 4: What is the appropriate relief plan implementation schedule for the following area codes:**

**A) 305/786**

Omnipoint: No position.

**B) 561**

Omnipoint: No position.

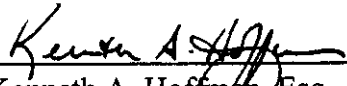
**C) 954**

Omnipoint: No position.

**D) 904**

Omnipoint: No position.

Respectfully submitted,

  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Omnipoint Communications' Prehearing Statement was furnished by U. S. Mail this 23rd day of June, 2000, to the following:

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