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June 23, 2000

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

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Brief of Law and the Evidence, which we ask that you file in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (BW)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey

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CMP *Itleri*  
COM 3  
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LEG I  
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**Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)**

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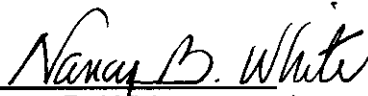
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**ORIGINAL**

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of proposed )  
numbering plan relief for the 305/786 )  
area code )  
\_\_\_\_\_ )

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

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**BELLSOUTH TELECOMMUNICATIONS, INC.  
BRIEF OF LAW AND THE EVIDENCE**

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                    A)    305/786

                    B)    561

                    C)    954

                    D)    904..... 4

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                    A)    305/786

                    B)    561

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## STATEMENT OF THE CASE

In March and April of 1999, the North American Numbering Plan Administrator ("NANPA") notified the Florida Public Service Commission (the "Commission") that the Monroe County portion of the 305 area code (or Numbering Plan Area ("NPA")), and the 954, 561 and 904 area codes were in extraordinary jeopardy and would soon exhaust. Measures were taken to preserve numbering resources in these NPAs, including the adoption of jeopardy measures by the industry, until the Commission could adopt NPA relief plans for each of the affected NPAs.

Because it seemed likely that an NPA relief plan for the Monroe County portion of the 305 NPA might include an expansion of the overlay of the 786 NPA, which covers the non-Monroe County portion of the 305 NPA, the Commission determined that the entire 305 NPA as well as the 786 NPA should be included in a single docket. Separate dockets were opened to consider relief plans for the 954, 561 and 904 NPAs. All four dockets were consolidated. Interested parties submitted written testimony. In addition, the Commission deposed Tom Foley of NeuStar, the NANPA (formerly a division of Lockheed) and Stan Greer of BellSouth Telecommunications, Inc. ("BellSouth"). BellSouth deposed Lennie Fulwood of the Public Service Commission staff. A hearing was held in these consolidated dockets on May 18, 2000. The prefiled testimony of the parties, together with the deposition transcripts, were entered into the record in lieu of live testimony at the hearing by stipulation.



## STATEMENT OF BASIC POSITION

BellSouth supports the consensus recommendations for relief in each of the NPA's in these consolidated dockets that resulted from meetings of the telecommunications industry in Florida. The consensus recommendation in the 904, 561, and 954 NPAs was to relieve the impending exhaust via an overlay, and in the 305/786 NPA, to extend the existing overlay to the Keys area. The overlay approach would not require customer number changes (and the resulting expense and inconvenience to customers). In addition, an overlay would result in simpler dialing patterns than the other alternatives and could be implemented more quickly and easily.

BellSouth supports the implementation of an overlay for all of the NPAs in question, however, BellSouth also recognizes that the FPSC may find it appropriate to implement a geographic split or some hybrid plan. Numerous plans for each area code have been developed, reviewed, and considered by all parties to the record. Most, if not all, industry parties, support implementation of the overlay, and many parties have indicated some support for another plan, if the Commission deems a different alternative is appropriate. Of these plans, most are some type of a geographic split.

The FPSC must take into consideration several different factors in reaching a decision. First, the Commission should consider the impact to the customers. Second, the Commission should consider whether the plan complies with the Industry Numbering Committee (INC) guidelines. Third, the Commission should consider the impact to the carriers. Finally, the Commission should consider the ability to implement future area code relief in a reasonable manner.

If the Commission finds that an alternative plan, rather than the overlay, should be implemented, BellSouth does not believe any of the plans proposed for the 305/786, 561 and 954 area codes are appropriate for the various reasons presented in BellSouth's rebuttal testimony. BellSouth does believe Alternative 6 is the best alternative for area code 904, if the FPSC wants to implement a geographic split in lieu of the overlay. Alternative 6 not only provides options for future relief, but it retains most of the communities of interest within a given NPA. In addition, Alternative 6 mirrors the area covered by the Commission approved number pooling trial for the 904 area code.

If the FPSC wants to implement number conservation measures, then those measures should be considered in Docket No. 981444-TP. Using that process allows the industry, as well as the Commission, to consider every aspect of a given conservation measure.

## STATEMENT OF POSITION ON THE ISSUES

**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

**\*\*Position:** 1a A) Yes. In the 305/786 NPA, the Commission should order that the existing overlay be extended to the Keys area.

1a B) Yes. The Commission should order an overlay for the 561 NPA.

1a C) Yes. The Commission should order an overlay for the 954 NPA.

1a D) Yes. The Commission should order an overlay for the 904 NPA.

The implementation of overlays makes the most sense for a number of reasons. First, it would not require customers to change telephone numbers. Accordingly, consumers and businesses in Florida would not have to go to the expense and inconvenience of purchasing new letterhead (unless the letterhead only identified 7 digits of their telephone number), notifying friends, family and business associates of the number change. Second, it would avoid the imposition of confusing dialing patterns. With a split, a customer may have to remember whether to dial 7 digits, 10 digits or 11 digits, depending on the location of the person called. A split in 954, for example would result in a substantial number of local calling routes for which 10 digit dialing would be necessary, but it likely would be difficult for a customer to understand or recall which local calls required 10 digits, and which merely required 7. Tr. at 180-182/Greer Rebuttal at 10-12. With an overlay, all local calls would be 10 digits and

competitive ECS and toll calls would be 11 digits. Third, an overlay would be easier to implement and would take less time to implement. Fourth, the implementation of an overlay would also provide for future area code relief with little if any impact to customers.

**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
- B) 561
- C) 954
- D) 904

**\*\*Position:** The industry's consensus relief plan for each area code will impose the least cost and inconvenience on customers alike. However, if the Commission believes it is appropriate to implement some type of a geographic split, BellSouth believes the only split option that is appropriate is Alternative 6 for the 904 area code.

BellSouth believes that the industry's consensus relief plans for each of the four NPAs at issue will impose the least cost and inconvenience on customers and carriers alike. All of the plans that involve geographic splits would result in forced changes of telephone numbers for many customers, (see, e.g. Tr. at 184/Greer Rebuttal at 14), and would require, in many cases, confusing dialing patterns (Tr. at 180-185/Greer Rebuttal at 10-15). [Pg.6]. In addition, in the 954 NPA, the imposition of an NPA split, rather than an overlay, would result in BellSouth having to implement a dialing delay of 4 to 6 seconds in most, if not all, of the offices in the 954 area code. Tr. at 181/Greer Rebuttal. The consensus plan proposed for each NPA would not require any customers to change telephone numbers and would result in simpler dialing patterns (with no added dialing delays).

Depending on the options approved by the Commission in the 561, 954, and 305/786 NPAs, BellSouth will have to implement a dialing delay in the majority of the offices in those area codes as well. A dialing delay is required due to the fact that there would be the possibility of two different routes having the same dialing pattern if customers incorrectly dialed a specific call. The Commission recognized this situation in Docket No. 960090-TP, Order No. PSC-96-0558-FOF-TP (Order No. 0558), and decided a dialing delay was not appropriate but decided to use the dialing pattern as a means of not introducing a delay. When the FPSC issued Order No. 0558, the parties to that proceeding believed having different dialing patterns for potential conflicts minimized any problem in the area. However, it should be noted that, even with annual notice of the appropriate dialing patterns, customers do not always use the correct dialing pattern, and thus, end up calling someone other than their intended party. For example, a customer in Pompano Beach wants to call a customer, 561-354-4578, in the 561 area code and the call is an ECS call. The dialing pattern for an ECS call on a competitive route is 1+561+7-digits for that area. If the customer making the call does not dial the 1, then that call will be routed to 561-3544, which resides in the Ft. Lauderdale exchange (Pompano to Ft. Lauderdale is a 7-digit EAS call). The switch in the Pompano Beach office will route the call to the first 7-digits dialed. Therefore, in order to route the call to the correct called party, BellSouth would have to implement a dialing delay to wait for the remainder of the digits being dialed by the calling party to ensure that misdialed calls are routed correctly. This problem is not only due to a customer dialing incorrectly but also occurs if a code conflict exists for some reason.

Some of the alternatives suggested by Staff include some form of NPA relief combined with additional number conservation measures. See, e.g. *Alternative 12 for the 305/786 NPA*. In support of these alternatives, Staff offered projections of the estimated increase in the life span of the affected NPA. Exhibit 16. The Commission should not consider such alternatives for a number of reasons. First, the Commission has ordered a number of conservation measures recently, as noted below. The Commission should assess the impact of these measures and consider the report of the task force set up by Staff to evaluate number conservation measures before taking additional action. Second, the Commission lacks the authority to impose RCC, one of the potential number conservation measures identified by Staff. Exhibit 16; Tr. at 174/Greer Rebuttal at 4.

In addition, the estimates Staff provided concerning the estimated increase in the NPA life with such number conservation measures did not result from any analysis of the likely effect of such measures. Instead, Staff simply assumed that demand for NXX code assignment in the affected NPAs would be cut in half if the measures were adopted. Exhibit 7, page 12. Accordingly, the Commission should disregard such estimates as arbitrary and unfounded.

BellSouth believes the Commission should not approve any alternative other than the overlay proposals adopted by the industry. However, if the Commission believes a geographic split is appropriate in the 904 area code, BellSouth believes Alternative 6 is the best geographic split relief proposal based on the discussion above. BellSouth does not believe any other geographic split is appropriate in the other NPAs due to the reasons presented in BellSouth's rebuttal testimony.

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

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

**\*\*Position:** BellSouth supports the number conservation measures adopted in recent orders of the Commission in Docket 981444 regarding these NPAs. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission's staff before adopting any additional measures.

BellSouth supports the number pooling recently ordered by the Commission in Order No. PSC-00-1046-PAA-TP (May 30, 2000) for number pooling in the 954, 561 and 904 area codes. In addition, BellSouth supports the number conservation measures (except for the number pooling measures) adopted by the Commission in Order No. PSC-00-0543-PAA-TP (March 16, 2000). BellSouth believes that rate center consolidation ("RCC") may prove to be an effective number conservation measure in appropriate circumstances provided this measure can be accomplished in a revenue and cost neutral manner. For a level of magnitude, the RCC proposal developed by BellSouth, in the RCC Working Group, would decrease BellSouth's revenues by approximately 11 million dollars a month. BellSouth believes that RCC would effect a change in its rates and calling scopes and that the Commission therefore lacks the authority to order it. Tr. at 174/Greer Rebuttal at 4. The Commission has recognized its inability to change rates and calling scopes in numerous requests for EAS. BellSouth believes that the Commission should consider the recommendations of the

task force set up by the Commission Staff to examine number conservation measures before adopting any additional measures.

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

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

**\*\*Position:** BellSouth supports the number conservation measures adopted in recent orders of the Commission in Docket 981444 regarding these NPAs. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission's staff before adopting any additional measures.

BellSouth supports the number pooling recently ordered by the Commission in Order No. PSC-00-1046-PAA-TP (May 30, 2000) for number pooling in the 954, 561 and 904 area codes. In addition, BellSouth supports the number conservation measures (except for the number pooling measures) adopted by the Commission in Order No. PSC-00-0543-PAA-TP (March 16, 2000). BellSouth believes that the measures taken in those orders should be implemented in accordance with the schedule set forth in those orders.

BellSouth also believes that RCC may prove to be an effective number conservation measure in appropriate circumstances provided this measure can be accomplished in a revenue and cost neutral manner. BellSouth believes that RCC would effect a change in its rates and that the Commission therefore lacks the authority to order it. Tr. at 174 Greer Rebuttal at 4. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission Staff to examine number conservation measures before adopting any additional measures.



**Issue 3: What should be the dialing pattern for local, toll, EAS, and**

**ECS calls for the following area codes:**

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

**\*\*Position:** Depending on the relief plan implemented by the Commission, listed below are the dialing patterns BellSouth believes the Commission should implement unless there is a technical limitation:

Type of Call	Dialing Patterns		
	Geographic Split Relief	Overlay Relief	Between Area Codes (Regardless of Relief Method)
Local/EAS	7 digit	10 digit	10 digit
ECS without IXC Competition	7 digit	10 digit	10 digit
ECS with IXC Competition	1+10 digit	1+10 digit	1+10 digit
Toll	1+10 digit	1+10 digit	1+10 digit

BellSouth believes the dialing patterns listed above are consistent with previous Commission orders and the dialing parity requirements of the various state and federal statutes. Exhibit 1. However, there are circumstances, as the Commission recognized in Docket No. 980048-TL, that warrant a deviation from the dialing patterns listed above. Generally, BellSouth expects the deviation will be due to some technical limitation within a company's switch or billing system.

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

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

**\*\*Position:** BellSouth believes the Commission should evaluate each case as to whether an implementation schedule should be determine at this time.

Due to the number of area code reliefs being considered in the consolidated hearing and the uncertainty of the potential impact of any number conservation measure implemented in the various area codes, BellSouth recommends that the Commission coordinate with the Industry and NANPA when establishing the permissive and mandatory dialing periods. There are limitations as to the number of NPAs that can be converted at the same time. BellSouth believes it may be beneficial to establish an implementation meeting for each NPA to set the specific permissive and mandatory dialing periods once the imminent exhaust for that NPA is determined. If an area is not directly affected by number pooling, the Commission could establish an implementation meeting, as soon as possible, since the impact of pooling will probably not significantly affect the life of the given area. The implementation meetings will provide for the smooth transition to the specific area code reliefs ordered by the Commission. If an area is directly impacted by number pooling, BellSouth believes it would be better to establish an implementation schedule later once an imminent exhaust is determined. No matter whether the Commission established an implementation schedule now or later, it should provide sufficient time for notification, implementation, and testing of any given area code relief plan. The Commission should also note that most conversions

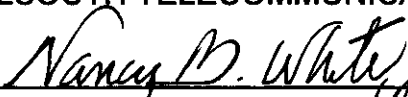
for an area code relief are done during the weekend with the following Monday being the start of the relief. In today's competitive environment, coordination of the system conversions with the actual start of the relief is more critical and will minimize the problems encountered during a conversion to the new area code.

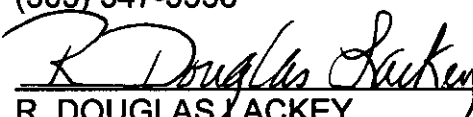
### CONCLUSION

For the reasons stated above, BellSouth requests that the Commission adopt the consensus plan for an overlay in each of the NPAs in these consolidated dockets. Further, the Commission should establish implementation meetings for each area code to ensure of a smooth transition for any affected area.

Respectfully submitted this 23rd day of June, 2000.

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