

SARASOTA COUNTY GOVERNMENT

Office of the County Attorney

ORIGINAL

1660 Ringling Blvd. Second Floor Sarasota, Florida 34236

Jorge L. Fernández County Attorney

February 1, 2001

RECOUNT AND RECOUNTS AND RECOUNTS AND

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

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Re: Docket No. 000604-TL, Area Code Relief for the 941 Area Code

Dear Ms. Bayo:

SER

Attached is the original and fifteen(15) copies of the pre-filed testimony of Shannon Staub, Gregg D. Feagans, Virginia Haley and William W. Couch on behalf of Sarasota County, Florida, a party in the above-referenced proceeding.

Please indicate receipt of this filing on the enclosed copy of this letter and return to the undersigned in the enclosed stamped envelope. Thank you for your attention to this matter.

01525-01 01526-01 01527-01		Sincerely, Schneider Assistant County Attorney	
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1	BEFO	RE THE FLORIDA PUBLIC	SERVICE COMMISSION
2			
3	In Re: Request for	Review of Proposed	Docket 000604-TL
4	Numbering Plan Relief for the 941		
5	Area Code		
6		PRE-FILED TEST	IMONY
7		OF SHANNON S	STAUB
8	Q.	Please state your name an	d your business address for the
9		record.	
10	A.	Shannon Staub, Sarasota Co	ounty Government, 1660 Ringling
11		Blvd., Sarasota, Florida.	
12	Q.	What is your position with	h Sarasota County Government?
13	A.	I am currently serving as a	member of the Sarasota County Board
14		of County Commissioners.	
15	Q.	How long have you been a	a member of the Sarasota County
16		Board of County Commis	sioners?
17	A.	I was elected to a 4-year ter	rm on the Board as the Commissioner
18		from District 3 in November	er 1996. District 3 includes that portion
19		of the Englewood commun	ity which is located in Sarasota County
20	Q.	In light of the projected e	xhaust date for the 941 Area Code in
21		the first quarter of 2003,	Docket No. 000604-TL was
22		established for the Public	Service Commission to consider
23		several relief plans for the	e 941 service area. The industry

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FPSC-RECORDS/REPORTING

1 recommends an all services distributed overlay plan for the 2 941 Area Code, with an estimated exhaust period of 10 years. 3 As County Commissioner, do you have any concerns about a distributed overlay as a proposed relief plan? 4 5 A. Yes. 6 In my view, the distributed overlay is not in the best interests of the 7 citizens of Sarasota County. It would result in a confusing array of 8 numbers without any regard for geographical boundaries. While I 9 appreciate the extended exhaust period the overlay method 10 provides, the confusion to the public in a community like Sarasota 11 County is too great. Consideration must be given to the 12 demographics of the community. For example, Sarasota County 13 has one of the highest elderly populations in the State. I find it 14 incredible that with a distributed overlay, a single household or 15 business could have multiple area codes, not to mention the fact 16 that any new neighbors or businesses will most definitely have a 17 different area code. It is difficult enough to remember multiple 7-18 digit numbers, without adding multiple 10-digit numbers to the 19 mix. Moreover, the confusion results not only to the elderly, but to 20 children and visitors to the community. In order for area codes to 21 have any meaning for the individual, they must have a relationship 22 to geographical boundaries.

1	Q.	If the Commission were to consider alternatives to an overlay,
2		would you have any recommendation?
3	A.	Yes. I strongly recommend Alternative #4. This alternative
4		recognizes the strong community of interests between Sarasota
5		County, Manatee County, and Charlotte County. In addition, the
6		proposed exhaust period of seven years provides a level of
7		continuity to commercial users that is essential in high tourism
8		counties such as ours. Finally, it does not impose a complicated
9		10-digit dialing system on our citizens.
10	Q.	Although not recommended by the industry, the North
11		American Numbering Plan Administrator (NANPA) has also
12		submitted two additional alternatives to the Commission.
13		Alternative #2, the LATA line split, would put Englewood in a
14		different area code from the rest of Sarasota County.
15		Alternative #3 splits Punta Gorda away from the rest of
16		Charlotte County. Recognizing that Alternative #3 does not
17		affect Sarasota County, do you consider Alternative #2 to be a
18		viable alternative?
19	A.	Absolutely not. This alternative was the industry's favored
20		alternative during last year's hearings, and Sarasota County
21		vehemently opposed it then, and continues to do so now. It is
22		Sarasota County's position that Charlotte County and Sarasota
23		County have to stay in one area code. To understand why, a little

1 historical perspective is necessary. In 1995, both counties created 2 a bi-county advisory board, made up of appointed citizens who 3 have worked diligently to come up with ideas as to how the two counties could work together to serve Englewood Community as 5 one community, not a split community. The advisory board has 6 given the Commissioners ideas for land planning, transportation 7 planning, utility planning and for emergency management. Over the years, Charlotte County and Sarasota County have tried 8 9 to bring Englewood together as one community. When people 10 travel in Englewood, they do not pay attention to county lines. 11 For years, the Counties have been working to overcome a 12 perception of divisiveness that Alternative #2 would only 13 exacerbate. Moreover, the Counties are planning major 14 expenditures on transportation routes that require the use of multi-15 county tax dollars. There is also a \$60 million evacuation route 16 being planned, with infrastructure in place to service both 17 Charlotte County and Sarasota County. In addition, a multi-18 million dollar downtown revitalization plan has been commenced 19 which will revitalize both Sarasota County and Charlotte County 20 businesses. A library services both Counties; and some Sarasota 21 County students attend a Charlotte County high school. As you 22 can see, it is a total interrelationship between the two counties that 23 a split along the LATA lines would severely undermine.

Q. 2 exhaust of the 941 area code? 3 Yes. In 1997, the 813 area code area was split and Sarasota Α. County received 941 as a new area code. As a coastal county with 4 a substantial tourism industry, the imposition of a new area code 5 resulted in great expense to the businesses and confusion to our 6 7 potential visitors. Two years later, Sarasota County intervened in the 941 Area Code proceedings, advocating a multi-way split of 8 the area code so as to lengthen the exhaust period. Specifically, we 9 advocated a separate area code for Sarasota, Charlotte and Manatee 10 counties. We were told that the FCC would never go along with a 11 12 multi-way split and that the 941 area code could have only one split. As a result, Sarasota, Manatee, Charlotte, Lee, Collier and 13 Monroe counties were lumped together. As testified, these are 14 15 some of the fastest growing counties in the State. Yet, the 16 Commission found this to be the appropriate relief plan, and it became mandatory on May 22, 2000. 17 18 Now, one year later, another split is imminent. Only two months after the last split became mandatory, the industry met to review 19 and discuss the next relief alternative for the 941 area code. 20 During the 1999 hearings, there was much discussion about the 21 reasons for short exhaust periods. One of the main reasons is the 22 distribution of phone numbers in blocks of 10,000. The industry 23

Do you have any additional concerns about the imminent

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1		and NANPA assured the counties that number pooling was
2		imminent and, once implemented, would extend the exhaust
3		period. To date, this has not been accomplished.
4		In February 2000, the PSC ordered telephone service providers in
5		the 561, 904 and 954 area codes to return all unused and reserved
6		numbers, imposed criteria for companies requesting new numbers
7		and directed the phone industry to develop a schedule for
8		implementing number pooling. Sarasota County strongly
9		recommends that such measures be adopted statewide.
10		Frequent changing of area codes is extremely costly, confusing and
11		frustrating. Clearly, the old methods of allocation are not working
12		in light of the explosion in telecommunications service providers.
13		As I mentioned, an overlay is not the answer. While it is a quick
14		fix for the industry, it is confusing and burdensome to the citizens.
15		On behalf of Sarasota County Government, I implore the
16		Commission to not only choose Alternative #4 in the present
17		proceeding, but also to immediately adopt rules to implement
18		number pooling throughout the State and to have unused numbers
19		returned.
20	Q.	Does this conclude your testimony?
21	A.	Yes, it does.
22		

CERTIFICATE OF SERVICE DOCKET NO. 000604-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this / 5t day of February, 2001 to the following:

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