## MORRISON & FOERSTER LLP

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February 1, 2001

By Overnight Courier

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

> - --

Re: Docket No. 000604-TL

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies and an electronic copy on diskette of the Pre-Filed Direct Testimony of Thomas C. Foley on behalf of NeuStar, Inc. Please date-stamp the enclosed return copy as received and return it in the attached self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Imberly While,

Kimberly Wheeler Counsel for NeuStar, Inc. North American Numbering Plan Administrator

Enclosures

### Before the FLORIDA PUBLIC SERVICE COMMISSION Tallahassee, Florida 32399-0850

In re: Request for Review of Proposed Numbering Plan Relief for the 941 Area Code

Docket No. 000604-TL

## PRE-FILED DIRECT TESTIMONY OF THOMAS C. FOLEY ON BEHALF OF NEUSTAR, INC.

Filed February 2, 2001

## Pre-Filed Direct Testimony of Thomas C. Foley On Behalf of NeuStar, Inc.

## 1 **QUALIFICATIONS**

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2	Q.	Please state your name and business address.
3	A.	My name is Thomas C. Foley. My business address is NeuStar, Inc., 1120
4		Vermont Ave N.W., Suite 400, Washington, DC 20005
5		
6	Q.	With whom are you employed, and in what capacity?
7	A.	I have been employed by NeuStar, Inc. ("NeuStar") as a Numbering Plan Area
8		("NPA") Relief Planner for the Eastern Region of the North American Numbering
9		Plan since August 9, 1999. NeuStar is the North American Numbering Plan
10		Administrator ("NANPA"). The NANPA and other numbering functions were
11		transferred from Lockheed Martin IMS to NeuStar on November 30, 1999. As an
12		NPA Relief Planner, I am a member of a group within NANPA that initiates NPA
13		relief planning in NPAs within the Eastern Region of the United States in
14		sufficient time to prevent the exhaust of numbering resources. My responsibilities
15		include monitoring central office ("CO") code utilization trends and collecting
16		other information in order to project NPA exhaust, notifying the industry and
17		appropriate regulatory bodies of the need for NPA relief planning, and conducting
18		relief planning meetings with the telecommunications industry. Once the industry
19		has agreed to recommend a relief plan, I prepare and forward the industry's
20		recommendations to the appropriate regulatory agency, then provide notification
21		of agency approved relief plans to the industry in accordance with the NPA Code

1		Relief Planning & Notification Guidelines (INC 97-0404-016, November 13,
2		2000) ("NPA Relief Planning Guidelines").
3		
4	Q.	Please describe your educational background and professional experience in the
5		telecommunications industry.
6	A.	I have a Bachelors of Science Degree in Electrical Engineering from the
7		University of Nebraska - Lincoln and a Masters of Business Administration from
8		Roosevelt University in Chicago. I also have a Masters Certificate in Project
9		Management from George Washington University. I have attended numerous
10		telecommunications industry schools and forums on engineering, management,
11		and project management.
12		
13		I have been employed in the telecommunications industry for more than twenty-
14		seven years. Prior to joining NANPA, I was employed by Sprint Corporation and
15		its predecessor companies. During my employment with Sprint, I held positions
16		in Engineering, Strategic Market Planning, Technology Planning, and Operations.
17		In my most recent previous position with Sprint, I managed large complex
18		interdepartmental projects such as NPA relief activities. I managed NPA relief
19		projects for Sprint from 1988 to 1999, including the implementation of
20		interchangeable NPA and CO codes and local number portability.

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1		I also teach mathematics, statistics, project management, and general management
2		courses at both the undergraduate and graduate level at the University of Phoenix.
3		
4	Q.	Have you ever appeared as a witness before the Florida Public Service
5		Commission ("Commission") before?
6	A.	Yes. I appeared as a witness on behalf of NeuStar in the 305/786, 561, 954 and
7		904 NPA relief proceedings. Before I accepted my position at NeuStar, I
8		appeared as a witness on behalf of Sprint in several proceedings before the
9		Commission, including the previous 941 NPA relief activity conducted in 1999.
10		
11		PURPOSE OF TESTIMONY
12	Q.	What is the purpose of your testimony?
13	A.	I offer this testimony to explain NANPA's role in the instant NPA relief
14		proceeding pursuant to the NPA Relief Planning Guidelines.
15		
16		NANPA's ROLE IN THE NPA RELIEF PROCESS
17	Q.	Please describe NANPA's role in this proceeding.
18	А.	The 2000 Central Office Code Utilization Survey and NPA Exhaust Analysis,
19		May 23, 2000 Update ("2000 COCUS") projections for CO codes indicated that
20		the 941 NPA is expected to exhaust during the first quarter of 2003. To allow
21		sufficient time to prepare for NPA relief to prevent exhaust in the 941 NPA,

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NANPA notified industry members and the Commission on May 18, 2000 that
 NPA relief planning for the 941 NPA needed to be addressed.

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On July 11, 2000, NANPA facilitated an industry meeting in Fort Myers, Florida 4 to present NPA relief alternatives to the industry and to ultimately allow industry 5 members to come to consensus on a relief plan to be presented to the 6 Commission. A copy of the meeting minutes is attached as Exhibit A to Exhibit 7 #1. Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to 8 industry members an Initial Planning Document ("IPD") prior to the relief 9 planning meeting. The IPD set forth four relief alternatives: an all services 10 distributed overlay – referred to as Alternative #1 in the IPD, and three different 11 geographic split options – referred to as Alternatives #2 through #4 in the IPD. 12 Prior to the publication of the IPD, the Commission Staff submitted two NPA 13 relief alternatives to NANPA identical to Alternatives #1 and #4 in the IPD. 14 Industry members presented no additional alternatives. The IPD included NPA 15 maps, descriptions, dialing requirements, and the projected life in years of each 16 relief alternative. The IPD is attached as Exhibit A, Attachment #5 to Exhibit #1. 17 18

At the July 11 meeting, the industry extensively discussed the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the allservices distributed overlay, as the preferred form of relief for the 941 NPA. In the event the Commission decides not to adopt an overlay, the Industry

i		recommends the geographic split referred to as Alternative #4. On September 19,
2		2000, NANPA filed a petition with the Commission on behalf of the industry
3		requesting the Commission's approval of the industry's recommended relief plan.
4		The petition, including attachments, is attached as Exhibit #1.
5		
6	Q.	Who comprises the Industry to which you refer?
7	A.	The Industry is comprised of those current and prospective telecommunications
8		carriers operating in, or considering operations in, the 941 area code of Florida.
9		The attendees of the July 11, 2000 meeting are listed in the Meeting Minutes,
10		attached as Exhibit A, Attachment #1 to Exhibit #1.
11		
12		RELIEF ALTERNATIVES
12 13	Q.	<b>RELIEF ALTERNATIVES</b> Please describe the alternative plans of relief set forth in the IPD.
	Q. A.	
13		Please describe the alternative plans of relief set forth in the IPD.
13 14		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1,
13 14 15		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1, would overlay a new area code over the same geographic area covered by the
13 14 15 16		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1, would overlay a new area code over the same geographic area covered by the existing 941 NPA. All existing customers would retain their area code and would
13 14 15 16 17		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1, would overlay a new area code over the same geographic area covered by the existing 941 NPA. All existing customers would retain their area code and would not be required to change their telephone numbers. Until the 941 NPA exhausts,
13 14 15 16 17 18		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1, would overlay a new area code over the same geographic area covered by the existing 941 NPA. All existing customers would retain their area code and would not be required to change their telephone numbers. Until the 941 NPA exhausts, carriers may request CO code assignments from either NPA. When the 941 NPA
13 14 15 16 17 18 19		Please describe the alternative plans of relief set forth in the IPD. The all-services distributed overlay alternative, referred to as Alternative #1, would overlay a new area code over the same geographic area covered by the existing 941 NPA. All existing customers would retain their area code and would not be required to change their telephone numbers. Until the 941 NPA exhausts, carriers may request CO code assignments from either NPA. When the 941 NPA

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1		the other area would be assigned a new NPA. A geographic split requires
2		customers located within the area receiving the new area code to change their
3		telephone numbers. A combination of seven and 10-digit local dialing would be
4		employed – seven-digit dialing would be retained for local calls placed within an
5		area code and local calls placed between the two area codes would require 10-
6		digit dialing. Alternative #2 proposes a geographic split in which the dividing
7		line follows the LATA line between the Tampa and Fort Myers LATAs.
8		Alternative #3 proposes a geographic split with the boundary line following the
9		boundary between the Punta Gorda and Port Charlotte rate centers. Alternative
10		#4 proposes a geographic split with the boundary line following the boundary line
11		between the Punta Gorda and North Fort Myers rate centers and coinciding with
12		the boundary between Lee and Charlotte Counties.
12 13		the boundary between Lee and Charlotte Counties.
	Q.	the boundary between Lee and Charlotte Counties. How long will the recommended alternative provide relief to the 941 NPA?
13	Q. A.	
13 14		How long will the recommended alternative provide relief to the 941 NPA?
13 14 15		How long will the recommended alternative provide relief to the 941 NPA? The projected life of Alternative #1, the all services distributed overlay, is eight
13 14 15 16		How long will the recommended alternative provide relief to the 941 NPA? The projected life of Alternative #1, the all services distributed overlay, is eight years. The projected life of Alternative #4, a geographic split alternative, is seven
13 14 15 16 17		How long will the recommended alternative provide relief to the 941 NPA? The projected life of Alternative #1, the all services distributed overlay, is eight years. The projected life of Alternative #4, a geographic split alternative, is seven
13 14 15 16 17 18	A.	How long will the recommended alternative provide relief to the 941 NPA? The projected life of Alternative #1, the all services distributed overlay, is eight years. The projected life of Alternative #4, a geographic split alternative, is seven years for one area and 10 years for the other area.
13 14 15 16 17 18 19	A.	How long will the recommended alternative provide relief to the 941 NPA? The projected life of Alternative #1, the all services distributed overlay, is eight years. The projected life of Alternative #4, a geographic split alternative, is seven years for one area and 10 years for the other area. Did the industry reach consensus on a relief implementation schedule to

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1	the Industry recommends that the Commission adopt a nineteen-month
2	implementation schedule including a six month network preparation period
3	beginning immediately upon the release of the Commission's relief order. The
4	network preparation period will be followed by a twelve-month permissive
5	dialing period during which customers may dial seven or 10 digits for local calls
6	placed within the 941 NPA. Mandatory dialing will begin at the end of the
7	permissive dialing period. Activation of the first CO code from the new relief
8	NPA will occur no sooner than one month after the implementation of mandatory
9	10-digit dialing. Adhering to the proposed timeframe will avoid the denial or
10	delay of service to telecommunications providers' customers due to the
11	unavailability of CO codes.

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13 Q. Does this conclude your testimony?

14 A. Yes, it does.

## MORRISON & FOERSTER LLP

SAN FRANCISCO LOS ANGELLS SACRAMENTO ORANGE COUNTY PALO ALTO WALNUT CREEK DENVER ATORNEYS AT L. 44

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Writer's Direct Dial Number (202) 887-8750

September 18, 2000

By Overnight Courier

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

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### Re: Docket No. 000604-TL

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of the Petition of NeuStar, Inc., as the North American Numbering Plan Administrator, on Behalf of the Florida Telecommunications Industry, requesting approval of a relief plan for the 941 area code. Please date-stamp the enclosed return copy as received and return it in the attached selfaddressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

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Kimberly Wheeler Counsel for NeuStar, Inc. North American Numbering Plan Administrator

Enclosures

### Before the FLORIDA PUBLIC SERVICE COMMISSION Tallahassee, Florida 32399-0850

In re:

Request for Review of Proposed Numbering Plan Relief for the 941 Area Code

Docket No. 000604-TL

## PETITION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE FLORIDA TELECOMMUNICATIONS INDUSTRY

NeuStar, Inc, in its role as the North American Numbering Plan Administrator

("NANPA") for Florida under the North American Numbering Plan and acting on behalf of

the Florida telecommunications industry ("Industry"),<sup>1</sup> petitions the Florida Public Service

Commission ("Commission")<sup>2</sup> for approval of the Industry's consensus decision to

implement an all services distributed overlay relief plan for the 941 Numbering Plan Area

("NPA").<sup>3</sup> In the event the Commission decides not to adopt an overlay, the Industry

recommends the geographic split identified as Alternative #4 in Exhibit A attached hereto as

its second choice for relief of the 941 NPA. The Industry submits its recommendation to the

<sup>&</sup>lt;sup>1</sup> The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the state of Florida.

<sup>&</sup>lt;sup>2</sup> The Federal Communications Commission delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19 (1999).

<sup>&</sup>lt;sup>3</sup> As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 941 NPA would exhaust during the first quarter of 2003.<sup>4</sup> In order to allow sufficient time for completion of the consensus plan prior to exhaust, the Industry requests that the Commission issue a decision approving the Industry's recommended relief plan no later than May 31, 2001. In support of this Petition, NANPA submits the following:

### I. BACKGROUND

Based upon the projected exhaust date and pursuant to Industry guidelines.<sup>5</sup> NANPA facilitated an Industry meeting in Fort Myers. Florida on July 11, 2000, to review and discuss relief alternatives for the 941 NPA.<sup>6</sup> Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document ("IPD") prior to the relief planning meeting. The IPD set forth four relief proposals for the 941 NPA: an all services distributed overlay – referred to as Alternative #1 in the IPD, a geographic split in which the dividing line follows the LATA line between the Tampa and Fort Myers LATAs – referred to as Alternative #2; a geographic split with the boundary line following the boundary between the Punta Gorda and Port Charlotte rate centers – referred to as Alternative

<sup>&</sup>lt;sup>4</sup> 2000 COCUS and NPA Exhaust Analysis, May 23, 2000 ("2000 COCUS"). The 2000 COCUS can be accessed on NANPA's web site at <a href="http://www.nanpa.com">http://www.nanpa.com</a>>.

<sup>&</sup>lt;sup>5</sup> To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 8, 1999) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

<sup>&</sup>lt;sup>6</sup> Attached as Exhibit A is a copy of the July 11, 2000 relief planning meeting minutes.

#3; and a geographic split with the boundary line following the boundary line between the Punta Gorda and North Fort Myers rate centers and coinciding with county boundaries referred to as Alternative #4.<sup>-</sup> Prior to the publication of the IPD, the Commission Staff submitted two NPA relief alternatives to NANPA identical to Alternatives #1 and #4 in the IPD. No additional alternatives were presented by Industry members. The IPD included NPA maps, descriptions, dialing requirements, and the projected life in years of each relief alternative.

At the meeting, the participants discussed the attributes of the various alternatives for each NPA and reached consensus to recommend Alternative #1, the all services distributed overlay relief plan, for the 941 NPA. In the event the Commission chooses not to adopt an overlay, the Industry recommends that the Commission approve Alternative #4. The Industry eliminated from consideration geographic split Alternative #2 because the dividing boundary line would split certain communities of interest and county lines. The Industry noted that a similar proposal during the 1999 941 NPA relief proceeding received public criticism.<sup>8</sup> The Industry rejected Alternatives #3 because it would divide Extended Area Service ("EAS") local calling areas and it would split county boundaries.

A copy of the IPD, including maps depicting each alternative, is attached as Attachment #5 to Exhibit A.

<sup>&</sup>lt;sup>8</sup> In 1998 and 1999, the Commission conducted public hearings and an evidentiary hearing to address NPA relief for the 941 NPA and ultimately issued an order directing the split of the 941 NPA. *Final Order Approving Numbering Plan Area Relief for the 941 Area Code*. Docket Nos. 981941-TL, 990184-TL, 990223-TL, Order No. PSC-00-1066-FOF-TL (May 25, 1999). The 863 NPA was assigned to relieve the 941 NPA.

#### II. DESCRIPTION OF THE PROPOSED RELIEF PLANS FOR THE 941 NPA

The recommended all services distributed overlay alternative for the 941 NPA would overlay a new area code over the same geographic area covered by the existing NPA All existing customers in the 941 NPA would retain their current ten digit telephone numbers. In agreement with Federal Communications Commission regulations, the relief plan would require ten-digit local dialing both within and across boundaries of the existing NPA and the relief NPA.<sup>9</sup> When the 941 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #1 is 8 years.

The Industry recommends that the Commission release an NPA relief order no later than May 31, 2001. Based upon a relief order released prior to that date, the Industry recommends that the Commission adopt a nineteen-month implementation schedule including a six month network preparation period beginning immediately upon the release of the Commission's relief order. The network preparation period will be followed by a twelvemonth permissive dialing period during which customers may dial seven or ten digits for local calls placed within the 941 NPA. Mandatory dialing will begin at the end of the permissive dialing period. Activation of the first CO code from the new relief NPA will occur no sooner than one month after the implementation of mandatory ten-digit dialing. Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes

<sup>°</sup> 47 C.F.R. § 52.19(c)(3)(ii).

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The Industry's second choice for relief, a geographic split, would split the 941 NPA into two NPAs with the dividing boundary coinciding with both rate center boundanes and county boundaries. A geographic split requires customers located within the area receiving the new area code to change their telephone numbers. A combination of seven and ten-digit local dialing patterns would be employed: local calls placed within an area code would require seven-digit dialing while local calls placed between the two area codes would require ten-digit dialing. The projected life of Alternative #4 is 7 years for one area and 10 years for the other area.

### III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 941 NPA in Florida to prevent the exhaust of numbering resources. NANPA, on behalf of the Industry, requests that the Commission approve the Industry's recommended all services distributed relief plan and implementation schedule for the 941 NPA no later than May 31, 2001. In the event the Commission decides not to adopt an overlay, the Industry recommends that the Commission adopt Alternative #4, a geographic split, as its second choice for relief of the

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941 NPA. The Industry will begin implementing NPA relief once the Commission has

issued a final order approving the instant petition

- -- Respectfully submitted.

Mula Emile.

Cheryl A. Tritt. Kimberly D. Wheeler

MORRISON & FOERSTER LLP 2000 Pennsylvania Avenue, N.W., Suite 5500 Washington, D.C. 20006 (202) 887-1500

Counsel for NeuStar, Inc. North American Numbering Plan Administrator

September 18, 2000

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## EXHIBIT A

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## MEETING MINUTES OF THE FLORIDA 941 NPA RELIEF PLANNING INDUSTRY MEETING

TUESDAY, JULY 11, 2000 Fort Myers, Florida

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## MEETING MINUTES OF THE FLORIDA 941 NPA RELIEF PLANNING INDUSTRY MEETING

TUESDAY, JULY 11, 2000 Fort Myers, Florida

### WELCOME & INTRODUCTIONS

Thomas C. Foley, NPA Relief Planner, NeuStar, Inc., introduced himself and Frank Colaco, NPA Relief Planner, and welcomed everyone to the 941 Relief Planning Meeting. He then asked the attendees to introduce themselves and identify the companies they represented. There were thirteen participants at the meeting representing eight different entities. See Attachment #1 for the names of those who attended. See Attachment #2 for the agenda. The agenda was reviewed and no alterations were made to the discussion items or the timetable.

## NANPA'S ROLE AND RESPONSIBILITIES

Mr. Foley shared points regarding NANPA's role and responsibilities. A complete summary of the Federal Communications Commission Action Regarding Administration of the North American Numbering Plan can be found at the following website address: www.atis.org/atis/nanp/nanpreq.htm.

Mr. Foley provided the meeting participants with various web site addresses containing information regarding NANPA and its relief activities and responsibilities. The list also included the web site addresses of Eastern Region NPA Relief Planning staff members and their contact information.

## MINUTES AND STATEMENTS FOR THE RECORD

Tom reviewed the consensus process definition with the participants and emphasized silence was consensus. Tom indicated that minutes of the meeting would only include consensus agreements. He also explained that participants would have an opportunity to make statements for the record, if desired.

The meeting format was reviewed and participants were reminded that the meeting minutes serve as the basis of the filing of the recommended relief plan with the Florida Public Service Commission (FPSC).

## INDUSTRY GUIDELINES /GENERAL ATTRIBUTES

Mr. Foley reviewed a summary of the Industry Approved Documentation Related to NPA Exhaust including the NPA Code Relief Planning and Notification Guidelines (INC 97-0404-016, Issued 11/8/99). This document can be obtained from the Internet at www.atis.org/atis/cle/inc/incdocs.htm.

Additionally, Tom reviewed the generally accepted attributes of both overlay and geographic split NPA relief alternatives. The attributes are found in Attachment #3.

## REVIEW CODE ASSIGNMENT HISTORY

Tom reviewed the code assignment history for the 941 NPA, which reflects 526 NXXs assigned through July 5, 2000. Currently, 253 NXX codes remain available for assignment in the 941 NPA and 21 codes are designated as Hold, Test or Unavailable. It was noted that the 2000 Central Office Code Utilization Survey (COCUS) reflects that the 941 NPA is forecasted to exhaust in 1Q2003. The previous forecast had the exhaust 4Q2002. A summary of code assignment history is found in Attachment #4.

### REVIEW INITIAL PLANNING DOCUMENT (IPD)

Tom reviewed the four NPA relief alternatives provided in the Initial Planning Document (IPD) that were proposed by NANPA. Tom reviewed Alternative #1, a distributed overlay and he also reviewed the rate center and county maps for the three split alternatives. Tom indicated that prior to publication of the IPD, the FPSC Staff submitted two alternatives, which were identical to the NANPA Alternatives #1 and #4.

### ADDITIONAL ALTERNATIVES FROM THE INDUSTRY

No additional alternatives were presented by the industry at the meeting.

### **ELIMINATION OF ALTERNATIVES**

A proposal was made, and consensus was reached, to eliminate Alternative #2 for the following reasons:

- Splits communities of interests
- Splits county lines
- Negative public reaction to a similar relief effort previously proposed

A proposal was made, and consensus was reached, to eliminate Alternative #3 for the following reasons:

- Splits Equal Access Service (EAS) local routes
- Splits county lines

### CONSENSUS ON A RELIEF ALTERNATIVE

A proposal was made, and consensus was reached to select Alternative #1, an all services overlay, as the Industry's preferred form of relief in the 941 NPA. Additionally, in the event an overlay relief plan is rejected by the FPSC in favor of a geographic split, the industry has indicated by consensus a preference for Alternative #4.

### CONSENSUS ON A DIALING PLAN

A proposal was made, and consensus reached, that the dialing plan for the overlay is recommended to be 10 digits for local calls.

## CONSENSUS ON IMPLEMENTATION INTERVALS

A recommendation was made, and consensus was reached, to adopt the following 19-month total implementation schedule for the all service overlay to commence upon receipt of a commission order consisting of:

- 6 months network preparation
- 12 months permissive dialing period
- 1 month first code activation

### INDUSTRY COMMITMENT FOR TEST NUMBER

Sprint volunteered to provide a test number for the purposes of implementing the new overlay relief NPA.

### CONSENSUS ON NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will document the Industry efforts regarding the 941 NPA relief and prepare the filing with the Florida Public Service Commission. The Industry agreed that the filing with the Florida Public Service Commission be made on or before September 19, 2000. Consensus was reached that the filing to the FPSC include a request that the commission make its decision on a 941 NPA relief plan by May 31, 2001.

### SET DATE FOR CONFERENCE CALL TO APPROVE MINUTES

Consensus was reached that the draft notes from this meeting will be distributed along with a draft commission filing to the industry by August 29, 2000. Consensus was also reached to conduct a conference call on September 12, 2000 at 10:00 AM (Eastern Time) to review and approve these notes as well as, the draft filing to the FPSC. Details of the call are as follows:

Date:	Tuesday, September 12, 2000
Time:	10:00 AM (Eastern Time)
Call-in Number:	(847) 413-2931
Access Code:	5095739#

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The teleconference to approve the minutes and draft filing was held as scheduled. Only one industry member attended. There were no objections to these minutes and filing.

## Attachment #1

## ATTENDEES FLORIDA 941 NPA RELIEF PLANNING INDUSTRY MEETING TUESDAY JULY11, 2000 Fort Myers, Florida

Thomas C. Foley Frank Colaco Jason Duff Barbara Green Beverly Menard Joe Gillenwate Penny Hadaway Susan Israel John Snyder Sandra Khazraee Howard Packer Anne Henderson Levent Ileri Cheryl Bulecza-Banks Vince Sosa

> - --

NeuStar, Inc., NANPA NeuStar, Inc., NANPA Sprint GTE Florida ITC DeltaCom ITC DeltaCom BellSouth Cellular Sprint BellSouth Mobility AT&T FPSC FPSC TSR Wireless

## Attachment #2

## FLORIDA 941 NPA RELIEF INDUSTRY MEETING Tuesday July 11, 2000

Comfort Suites Airport 13651 Indian Paint Lane Fort Myers, Florida 33912 (941) 768-0005

## AGENDA

8:45 Welcome and Introductions
8:55 NANPA Role and Responsibilities
9:05 Minutes and "Statements For The Record"
9:15 Industry Guidelines/General Attributes
9:25 Review Code Assignment History
9:40 Review Initial Planning Document (IPD)
10:15 Break

Registration

- 10:30 Review Initial Planning Document (IPD)
- 11:00 Additional Alternatives from Industry
- 11:45 Lunch (On Your Own)
- 12:45 Elimination Of Alternatives
- 1:00 Consensus On Relief Alternative
- 2:15 Consensus on Dialing Plan
- 2:30 Break

8:30

- 2:45 Consensus on Implementation Intervals
- 3:15 Industry Commitment For Test Number
- 3:30 Consensus on NANPA Filing Industry Efforts With Commission
- 3:40 Statements For the Record
- 3:45 Set Date For Conference Call To Approve Minutes
- 3:55 Complete NANPA Survey
- 4:00 Adjourn

## Attachment #3 GENERAL ATTRIBUTES FLORIDA 941 NPA RELIEF



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# **General NPA Relief Alternative Attributes**

Spl	lits

Overlays

1	General Attributes of Splits		General Attributes of Overlays		
•	• Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Future splits will reduce the geographic size of the area code.	•	With an overlay there will be multiple area codes for each geographic area and it will end further shrinking of the geographic size of the area code. Subsequent relief will likely be another overlay Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.		
•	Splits require an area code change for approximately one half of customer's numbers in a two way split and two thirds of customer's numbers in a three way split. Stationery, business cards and advertising will need to be revised by customers receiving the new area code.	•	An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.		
•	Geographic splits permit 7 digit local dialing within the smaller home NPA. However local dialing across the NPA boundary should become 10 digit.	•	An overlay will require customers to dial 10 Digits or 1 + 10 digits for all calls within the geographic area.		

General Attributes of Concentrated Growth Overlays

- Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay.
- It is very difficult to predict the exhaust of the nonoverlay area of the concentrated overlay.
- Customer confusion pertaining to dialing for a concentrated overlay could exist.
- In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.
- A concentrated growth overlay minimizes implementation of 10 digit dialing for customers.
- Normally, no existing customers will be required to change their telephone number

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## Attachment #4

## **NPA 941 NXX**

Summary

Data as of July 5, 2000

<u>NPA</u>	<u>941</u>
Assigned NXXs	526
Protected	0
Reserved	0
Hold	1
Test NXXs	2
Unavailable NXXs	18
Available NXXs	253
Total	800
Service Providers:	<u>941</u>
ILEC	2
CLEC	19
CAP	2
Interexchange Carrier	0
Wireless	21
Reseller	2

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Codes assigned NPA 941	<u>Jan-99</u>	Feb-99	<u>Mar-99</u>	<u>Apr-99</u>	<u>May-99</u>
	8	10	7	1	1
	<u>Jun-99</u>	<u>Jul-99</u>	<u>Aug-99</u>	<u>Sep-99</u>	<u>Oct-99</u>
	1	6	5	1	4
	<u>Nov-99</u>	<u>Dec-99</u>	<u>Jan-00</u>	Feb-00	Mar-00
	5	5	1	3	6
	<u>Apr-00</u>	<u>May-00</u>	<u>Jun-00</u>	<u>Jul-00</u>	
	7	14	15	0	
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## Attachment #5 INITIAL PLANNING DOCUMENT FOR RELIEF OF FLORIDA 941 NPA

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## **Initial Planning Document**

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## For Relief of Florida 941 NPA

## April 2000 NEP Projected Exhaust Date 1Q2003

North American Numbering Plan Administration

Thomas C. Foley NPA Relief Planner – Eastern Region

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### 941 NPA Relief Alternatives Projected Exhaust Date 1Q2003

#### **Overlay Alternatives**

#### Alternative # 1

#### Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 941 NPA in Southwest Florida. Customers would retain their current telephone numbers: however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 941 NPA all code assignments will be made in the new overlay area code.

Total codes at Exhaust = 783 Area code life in years = 8

#### Split Alternatives

The following two alternatives all involve the use of geographic splits. A split occurs when one geographic area receives a new NPA, while the other retains the current 941 NPA. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit local dialing would be permitted.

#### Alternative # 2

#### Geographic Split - LATA Line

The split boundary line runs along the LATA line between the Tampa LATA and the Fort Myers LATA.

Area A, North of the Split Line (Tampa LATA) Total codes at Exhaust = 348 Area code life in years = 10

Area B, South of the Split Line (Fort Myers LATA) Total codes at Exhaust = 345 Area code life in years = 6

Prepared by Thomas C. Foley 2 NPA Relief Planner – Eastern Region

## 941 NPA Relief Alternatives Projected Exhaust Date 1Q2003

#### Alternative # 3

#### Geographic Split - Punta Gorda South

The split boundary line runs exchange boundaries between the Punta Gorda and Port Charlotte Exchanges.

Area A. North of Split Line Total codes at Exhaust = 418 Area code life in years = 7

Area B, South of Split Line Total codes at Exhaust = 365 Area code life in years = 9

### Alternative #4

#### Geographic Split - Punta Gorda North

The split boundary line runs along the boundary between the Punta Gorda and the North Fort Myers Exchanges. This line coincides with the county boundaries.

Area A, Northeast of the split line Total codes at Exhaust = 429 Area code life in years = 7

Area B, Southwest of the split line Total codes at Exhaust = 354 Area code life in years = 10

### Alternatives Submitted by Florida Public Service Commission Staff

The Staff of the Florida Public Service Commission submitted two additional alternatives. They were the same as Alternative #1 and Alternative #4.

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941 NPA Relief Alternatives Projected Exhaust Date 1Q2003

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# FLORIDA 941 NPA ALTERNATIVES

## PROJECTED LIVES OF RELIEF ALTERNATIVES

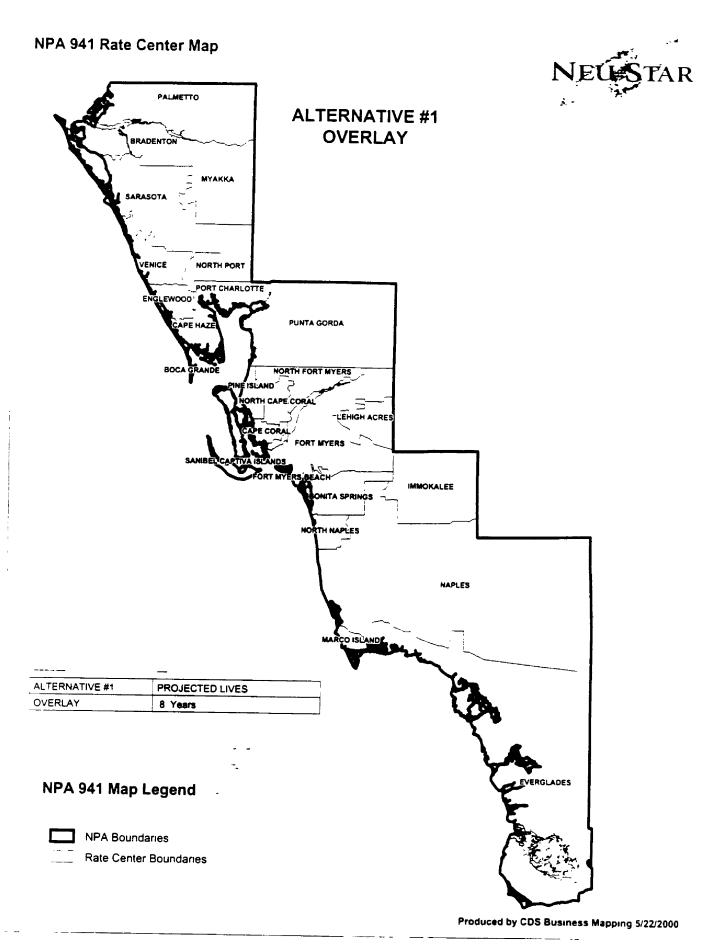
STANDARD LIVES (In Years)

<u>Alternative</u>	<u>Area A</u>	<u>Area B</u>
#1 #2 #3 #4	8 10 7 7	6 9 10

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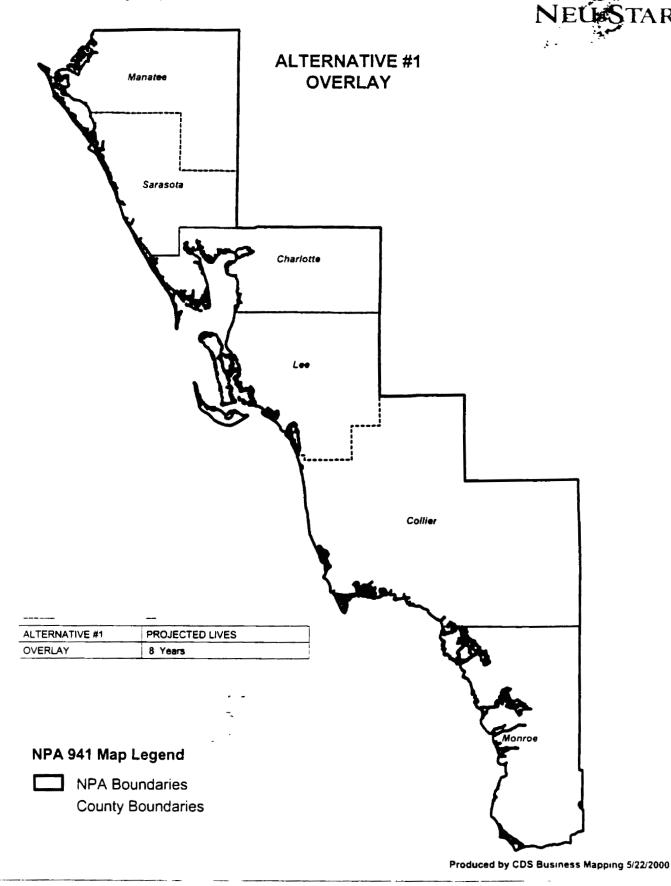
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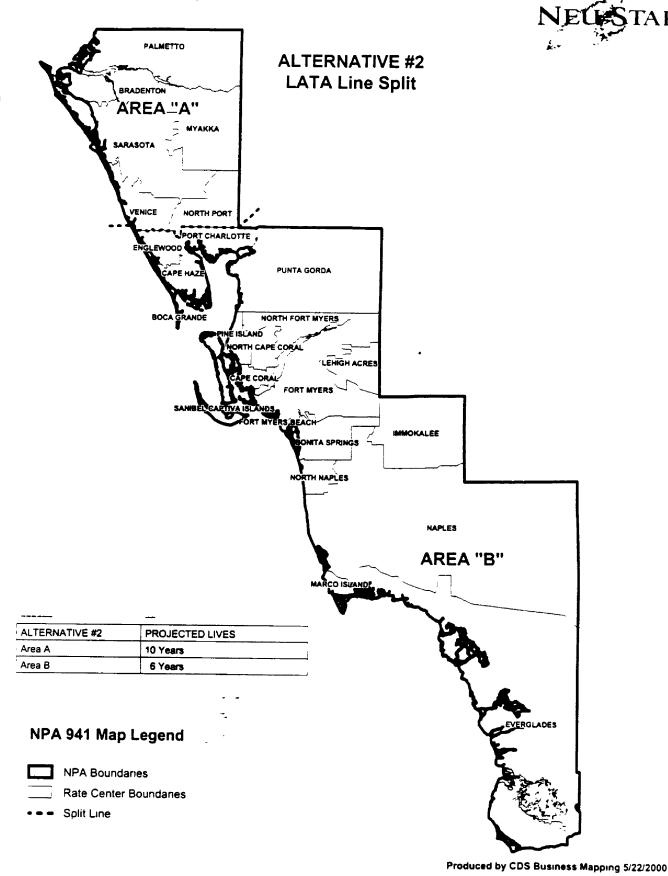
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### NPA 941 County Map

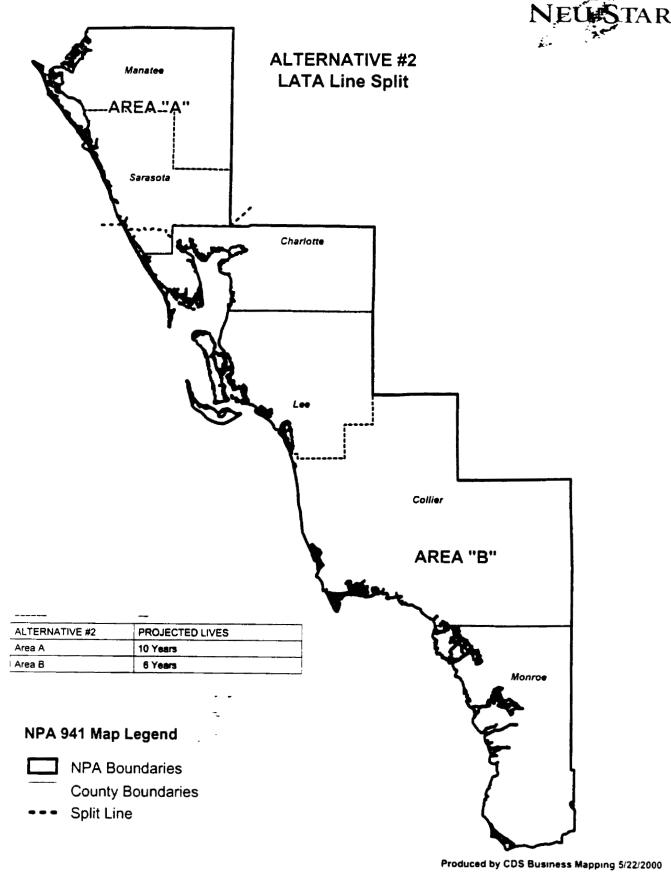


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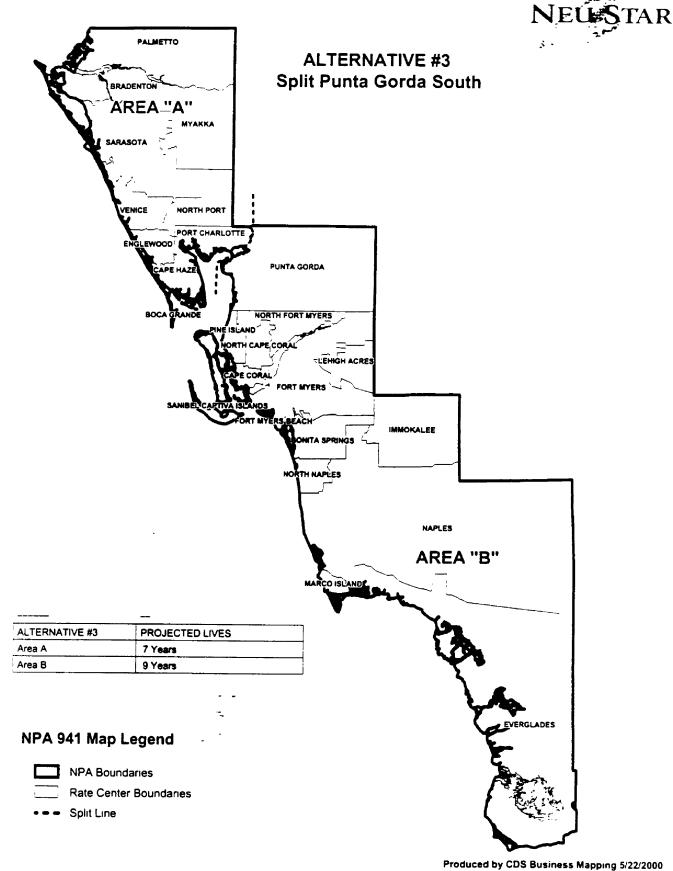








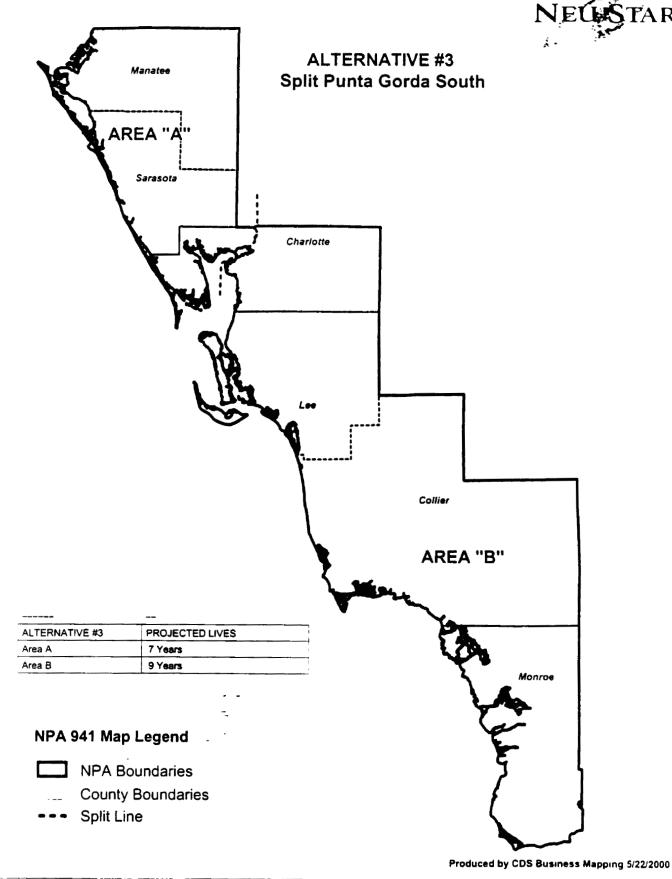
## NPA 941 Rate Center Map

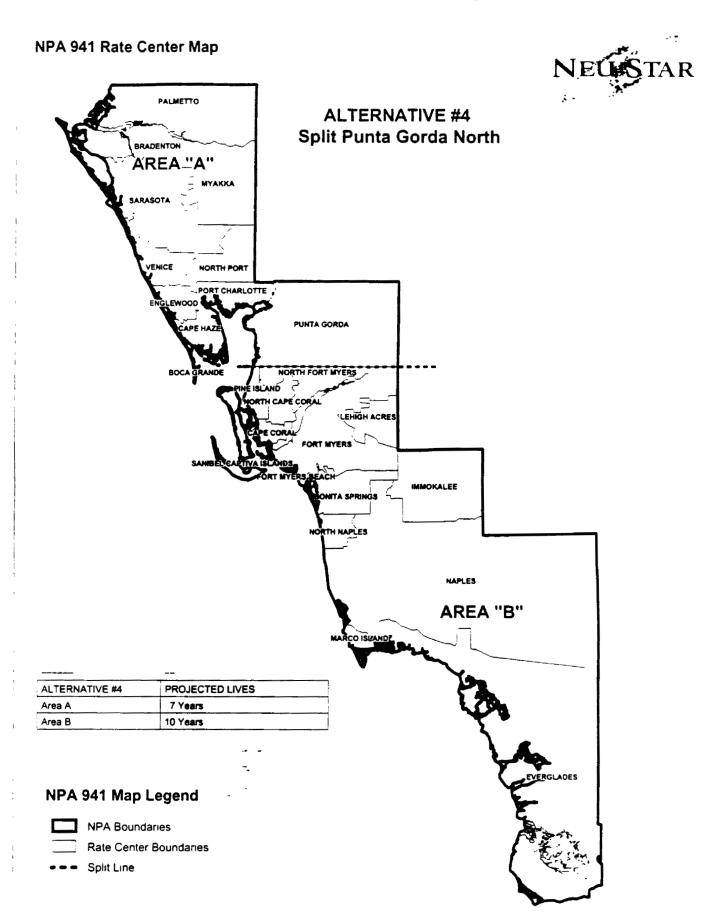


Produced by CDS Business Mapping 5/22/2000

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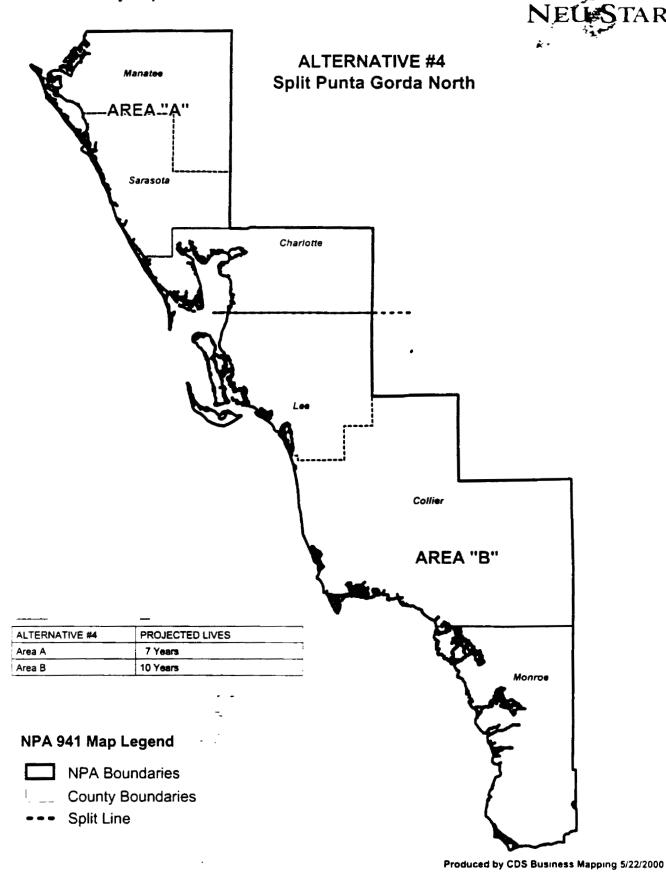
## NPA 941 County Map





Produced by CDS Business Mapping 5/22/2000

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## **CERTIFICATE OF SERVICE**

I, Theresa L. Pringleton, do hereby certify that the foregoing **PETITION** was delivered. Via U.S. Mail, this 18<sup>th</sup> day of September, 2000, to the following:

Charlotte County Attorney's Office Renee Francis Lee, County Attorney Martha Young Burton 18500 Murdock Circle Port Charlotte, FL 33948-1094

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 310 N. Monroe St. Tallahassee, FL 32301

Manatee County Board of Commissioners James A. Minix, Esq. P.O. Box 1000 Bradenton, FL 34206-1000

Monroe County Board of Commissioners Clerk 500 Whitehead St. Key West, FL 33040-6547

Pennington Law Firm Peter Dunbar/Karen Camechis P.O. Box 10095 Tallahassee, FL 32302-2095

Sprint PCS Joe Assenzo Legal Department 4900 Main Street, 11th Floor Kansas City, MO 64112

Time Warner Telecom of Florida, L.P. Ms. Carolyn Marek % Time Warner Telecom 233 Bramerton Court Franklin, TN 37069-4002 Collier County Board of Commissioners 3301 E. Tamiami Trail Naples, FL 33962-4977

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Sarasota County Kathleen Schneider, Assis. County Atty 1660 Ringling Blvd., 2nd fl. Sarasota, FL 34236

Sprint-Florida, Incorporated Charles Rehwinkel/Susan Masterton (MC FLTLHO0107) P. O. Box 2214 Tallahassee, FL 32316-2214

Verizon Florida Inc. Ms. Beverly Y. Menard % Ms. Margo B. Hammar 106 East College Avenue, Suite 810 Tallahassee, FL 32301-7704 Verizon Select Services Inc. Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 NeuStar, Inc. D. Wayne Milby Senior NPA Relief Planner - Eastern Region 8385 Yahley Mill Road Richmond, VA 23231

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Theresa L. Pringleton

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### **CERTIFICATE OF SERVICE**

I, Theresa L. Pringleton, do hereby certify that the foregoing **Pre-Filed Direct Testimony** was delivered, via U.S. Mail, this 1<sup>st</sup> day of February 2001, to the following:

Charlotte County Attorney's Office Renee Francis Lee, County Attorney Martha Young Burton 18500 Murdock Circle Port Charlotte, FL 33948-1094

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Monroe County Board of Commissioners Clerk 500 Whitehead St. Key West, FL 33040-6547

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Dr. Willard Coy Chair, Area Planning Board 4005 Cape Haze Drive Placida, FL 33946

Verizon Wireless Anne Hoskins, Esq. 1300 I Street, NW Suite 400 W Washington, DC 20005

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