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February 2, 2001

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

Re: Docket No. 000604-TL
Request for review of proposed numbering plan relief for the 941 area code

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of the Direct Testimony of Beverly Y. Menard on behalf of Verizon Florida Inc. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kim Kimberly Caswell

KC:tas
Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of proposed) Docket 000604-TL
numbering plan relief for the 941 area code)

**DIRECT TESTIMONY
OF
BEVERLY Y. MENARD
ON BEHALF
OF
VERIZON FLORIDA INC.**

February 2, 2001

DOCUMENT NUMBER-DATE

01530 FEB-20

FPSC-RECORDS/REPORTING

1 **DIRECT TESTIMONY OF BEVERLY Y. MENARD**

2
3 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND**
4 **POSITION WITH VERIZON.**

5 A. My name is Beverly Y. Menard. My business address is One Tampa
6 City Center, Tampa, Florida 33601-0110. My current position is
7 Assistant Vice President - Advocacy Support and I am employed by
8 Verizon Communications.

9
10 **Q. WILL YOU BRIEFLY STATE YOUR EDUCATIONAL**
11 **BACKGROUND AND BUSINESS EXPERIENCE?**

12 A. I joined GTE Florida Incorporated (now known as Verizon Florida Inc.)
13 in February 1969. I was employed in the Business Relations
14 Department from 1969 to 1978, holding various positions of
15 increasing responsibility, primarily in the area of cost separations
16 studies. I graduated from the University of South Florida in June of
17 1973, receiving a Bachelor of Arts Degree in Business Administration
18 with an Accounting Major. Subsequently, I received a Master of
19 Accountancy Degree in December of 1977 from the University of
20 South Florida. In March of 1978, I became Settlements Planning
21 Administrator with GTE Service Corporation. In January of 1981, I
22 was named Manager-Division of Revenues with GTE Service
23 Corporation, where I was responsible for the administration of the
24 GTE division of revenues procedures and the negotiation of
25 settlement matters with AT&T. In November of 1981, I became

1 Business Relations Director with GTE Florida Incorporated. In that
2 capacity, I was responsible for the preparation of separations studies
3 and connecting company matters. Effective February 1987, I became
4 Revenue Planning Director. In this capacity, I was responsible for
5 revenue, capital recovery and regulatory issues. On October 1, 1988,
6 I became Area Director - Regulatory and Industry Affairs. In that
7 capacity, I was responsible for regulatory filings, positions and
8 industry affairs in eight southern states plus Florida. In August 1991,
9 I became Regional Director - Regulatory and Industry Affairs for
10 Florida. I was responsible for regulatory filings, positions and industry
11 affairs issues in Florida. Effective November 2000, I assumed my
12 new position. I am responsible for the support of all regulatory filings
13 and positions advocated in the Southeast Region for Verizon.

14
15 **Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC**
16 **SERVICE COMMISSION?**

17 A. Yes. I have testified before this Commission on numerous occasions.

18
19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
20 **DOCKET?**

21 A. The purpose of my testimony is to present Verizon's position on the
22 appropriate relief for the 941 area code. In addition, I will address the
23 dialing patterns that should be utilized in the 941 area code.

24
25 **Q. WILL YOU PLEASE DESCRIBE THE 941 AREA CODE?**

1 A. Yes. The 941 area code today covers Manatee, Sarasota, Charlotte,
2 Lee, Collier and Monroe Counties. Verizon serves Manatee and
3 Sarasota counties. In addition, Verizon's Englewood exchange is
4 located in both Sarasota and Charlotte Counties. The remainder of
5 Charlotte, Lee, Collier and Monroe Counties are served by Sprint.

6

7 **Q. WHAT RELIEF SHOULD THE COMMISSION APPROVE FOR THE**
8 **941 AREA CODE?**

9 A. The Commission should approve the distributed overlay plan that was
10 unanimously approved by the current code holders in the 941 area
11 code.

12

13 **Q. WHY DOES VERIZON SUPPORT THE OVERLAY PLAN?**

14 A. The overlay approach is the least disruptive and most long-term
15 solution for this area. The 941 area code already had area code relief
16 a relatively short time ago. In Order Number PSC-99-1066-FOF-TL,
17 issued on May 25, 1999, the Commission ordered a geographic split
18 for the prior area represented by the 941 area code. As a result of the
19 Commission order, area code 863 was established for a portion of the
20 state. Mandatory dialing for the new area code was effective on May
21 22, 2000.

22

23 **Q. WHAT WAS THE ESTIMATED LIFE OF THE NEW 941 AREA**
24 **CODE AT THE TIME OF THE COMMISSION DECISION?**

25 A. The estimate was that the new 941 area code would have a life span

1 of 3.5 years. The current estimate is that the 941 area code will
2 exhaust during the first quarter of 2003. Therefore, this area will
3 exhaust quicker than originally estimated.

4

5 **Q. WHY DID THE INDUSTRY SUPPORT AN OVERLAY FOR THE 941**
6 **AREA CODE?**

7 A. The industry reached unanimous consensus on using the overlay
8 option because:

- 9 - It was the most cost-effective for customers, in that number
10 changes would not be required.
- 11 - It provided the most consistent and least confusing dialing
12 plan, since ten-digit dialing would be required for the whole
13 NPA area.
- 14 - The 941 area code had already been split a relatively short
15 time ago.

16

17 **Q. WHY DID THE INDUSTRY NOT SUPPORT ANOTHER**
18 **GEOGRAPHIC SPLIT AS THEIR PREFERRED OPTION?**

19 A. The industry opposes split options because a large number of
20 customers would be required to change their telephone numbers and
21 incur the associated cost. In addition, there is typically no place a
22 division can occur without causing some customer dissatisfaction and
23 dialing pattern changes on some routes (i.e., change from seven to
24 ten-digit dialing on any routes crossing the new NPA boundary).

25

1 No single relief plan will make all customers happy. While some
2 customers will be dissatisfied with an overlay (just as some will be
3 dissatisfied with any split), an overlay is probably inevitable in the not-
4 too-distant future, in any event. Verizon believes it is better to
5 implement the longer-term solution of an overlay now, rather than to
6 keep implementing splits, which cause controversy and confusion
7 every time they occur.

8

9 **Q. DID THE INDUSTRY SETTLE ON ANY SECOND CHOICE?**

10 A. Given the controversy surrounding numbering relief decisions in
11 recent years, the industry believed it needed to devise an alternate to
12 the overlay plan, in the event their first choice was not accepted. The
13 industry's second choice—which it considers substantially inferior to
14 the overlay plan—is a geographic split. The current 941 area code still
15 covers a large geographic area, so a split would remain feasible.
16 Given the Commission's preference for geographic splits, the industry
17 tried to find a split which would have the least disruption to seven-
18 digit dialing patterns. In addition, the industry tried to accommodate
19 the concerns that had been raised in the prior docket in which a
20 geographic split was implemented for the 941 area code. For
21 instance, customers in Manatee, Sarasota and Charlotte counties had
22 stated that they wanted to remain in the same area code. Therefore,
23 the industry tried to devise a geographic split which would best meet
24 the concerns addressed in the prior docket.

25

1 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR LOCAL CALLS?**

2 A. If the overlay is implemented, all local calls would be dialed on a ten-
3 digit basis. If a geographic split is implemented, some local calls
4 should be dialed on a ten-digit basis.

5

6 **Q. WHY SHOULD ANY LOCAL CALLS BE DIALED ON A TEN DIGIT**
7 **BASIS WHEN A GEOGRAPHIC SPLIT IS IMPLEMENTED?**

8 A. Due to the local/EAS/ECS calling areas, there is no dividing line which
9 will not split some local calling area. However, since the split occurs
10 a distance from the Verizon operating area, there would be no
11 Verizon local routes which would need to be dialed on a ten-digit
12 basis for the split devised by the industry.

13

14 **Q. WHAT ARE THE INDUSTRY GUIDELINES ON LOCAL CALLING**
15 **BETWEEN DIFFERENT AREA CODES?**

16 A. The industry guidelines state that inter-NPA calls should be done on
17 a ten-digit basis to insure against code conflicts and inefficient usage
18 of NXXs. Of course, with an overlay, these code conflicts are not
19 present.

20

21 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR TOLL CALLS?**

22 A. Verizon completed the conversion for intraLATA equal access in
23 February 1997. The dialing pattern for all toll routes for Verizon
24 customers continue to be 1+10 digits regardless of the relief plan
25 which is implemented. Customers are also able to dial calls on these

1 routes on a 1010XXX basis.

2

3 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR EAS CALLS?**

4 A. If the overlay is implemented, all EAS calls would be dialed on a ten-
5 digit basis. If a geographic split is implemented, some EAS calls
6 should be dialed on a ten-digit basis. However, no Verizon routes are
7 affected by the proposed geographic split.

8

9 **Q. WHAT SHOULD THE DIALING PATTERN BE FOR ECS CALLS?**

10 A. If the overlay is implemented, all ECS calls would be dialed on a ten-
11 digit basis. If a geographic split is implemented, some ECS calls
12 should be dialed on a ten-digit basis and some could remain on a
13 seven-digit basis. If the proposed geographic split is implemented,
14 there will be no impact on Verizon's ECS routes.

15

16 **Q. HAS THE COMMISSION MADE A DECISION ON THE LONG-TERM**
17 **DIALING PATTERNS FOR ECS CALLS?**

18 A. No. The Commission did initiate an investigation on dialing patterns
19 in Docket Number 960090-TP, but its decision did not determine the
20 long-term dialing patterns that should be used for ECS or other calls.
21 Its order in that Docket, issued on April 25, 1996 affected only certain
22 BellSouth routes.

23

24 **Q. WHAT WAS THE COMMISSION'S RECOMMENDATION FOR THE**
25 **DIALING PATTERN FOR ECS CALLS FOR THE LONG TERM?**

1 A. The recommendation was to dial all ECS calls on a 1+10 digit basis.

2

3 **Q. DO YOU HAVE ANY CONCERNS WITH THE RECOMMENDATION**
4 **FOR 1+10 DIGIT DIALING FOR ECS CALLS?**

5 A. Yes. With the implementation of intraLATA presubscription, when a
6 customer dials the digit "1", the call is transported by the customer's
7 chosen carrier. In the BellSouth case, if a customer wants ECS on an
8 intraLATA route with toll competition, the customer must choose its
9 serving local exchange carrier (LEC) as his presubscribed carrier. A
10 customer can not presubscribe to a carrier other than his serving LEC
11 in order to get ECS.

12

13 On local-only ECS routes, we would be disturbing the basic premise
14 of intraLATA presubscription if we were to implement 1+10 digit
15 dialing on these routes, because all ECS calls would be routed to
16 Verizon instead of the presubscribed carrier. It would also create
17 customer confusion as to why Verizon was handling these calls
18 instead of their presubscribed carrier. In addition, Verizon's billing
19 system will not recognize a 1+ call as local ECS. Since intraLATA
20 presubscription had not been implemented at the time of the
21 BellSouth Order and no discussion was held relative to local ECS
22 routes, this area was not addressed in that Order.

23

24 With the geographic split alternative the industry has devised, the
25 dialing pattern for all Verizon ECS calls would not change.

1 **Q. WHAT NUMBER CONSERVATION MEASURES, IF ANY, SHOULD**
2 **THE COMMISSION IMPLEMENT IN THIS DOCKET?**

3 A. The Commission should not implement any additional conservation
4 measures in this docket. Any such measures should be considered
5 in the generic Docket Number 981444-TP, so they can be done on a
6 uniform basis throughout the state and all affected parties can
7 participate in the proceeding.

8
9 As a result of the FCC's Report and Order in CC Docket No. 99-200,
10 released March 31, 2000, the Sarasota/Bradenton MSA (which is a
11 portion of the 941 area code) will eventually be on the FCC's
12 implementation schedule for thousand block number pooling.
13 However, the implementation schedule is unknown at this time.

14
15 **Q. IF NUMBER CONSERVATION MEASURES ARE TO BE**
16 **IMPLEMENTED, WHEN SHOULD THEY BE IMPLEMENTED?**

17 A. As stated above, as a result of the FCC's decisions in 2000, a number
18 of conservation measures are already being implemented on a
19 nationwide basis. If there are any additional measures which should
20 be implemented, they should be done in Docket Number 981444-TP.

21
22 **Q. WOULD YOU PLEASE SUMMARIZE WHY VERIZON SUPPORTS**
23 **THE OVERLAY PLAN?**

24 A. Yes. The overlay plan is the best method to provide uniformity and
25 consistency throughout the metropolitan area. It avoids the

1 confusion of having different dialing patterns for the same type of call
2 in an area where people live and work among the communities. The
3 implementation of an overlay will avoid having to go through another
4 relief proceeding.

5

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

7 A. Yes, it does.

8

9

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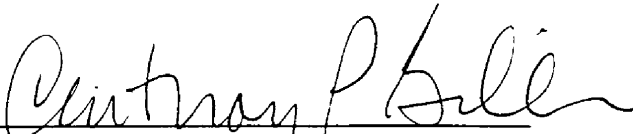
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Direct Testimony of Beverly Y. Menard on behalf of Verizon Florida Inc. in Docket No. 000604-TL were sent via U.S. mail on February 2, 2001 to the parties on the attached list.


for Kimberly Caswell

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