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February 20, 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. 0010102-TP

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,



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

Enclosures

dc-250719

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

In re: Investigation of proposed updates to
the Routing Data Base System
(RDBS) and Business Rating Input
Database System (BRIDS) affecting
the Tampa telecommunications
carriers.

Docket No. 0010102-TP

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

Filed
February 21, 2001

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

1 **QUALIFICATIONS**

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”). As an NPA Relief Planner, I am a member of a
11 group within NANPA that initiates NPA relief planning in NPAs within the
12 Eastern Region of the United States in sufficient time to prevent the exhaust of
13 numbering resources. My responsibilities include monitoring central office
14 (“CO”) code utilization trends and collecting other information in order to project
15 NPA exhaust, notifying the industry and appropriate regulatory bodies of the need
16 for NPA relief planning, and conducting relief planning meetings with the
17 telecommunications industry. Once the industry has agreed to recommend a relief
18 plan, I prepare and forward the industry’s recommendations to the appropriate
19 regulatory agency, then provide notification of agency approved relief plans to the
20 industry in accordance with the NPA Code Relief Planning & Notification
21 Guidelines (INC 97-0404-016, November 13, 2000) (“NPA Relief Planning
22 Guidelines”).

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Q. Please describe your educational background and professional experience in the telecommunications industry.

A. I have a Bachelors of Science Degree in Electrical Engineering from the University of Nebraska - Lincoln and a Masters of Business Administration from Roosevelt University in Chicago. I also have a Masters Certificate in Project Management from George Washington University. I have attended numerous telecommunications industry schools and forums on engineering, management, and project management.

I have been employed in the telecommunications industry for more than twenty-seven years. Prior to joining NANPA, I was employed by Sprint Corporation and its predecessor companies. During my employment with Sprint, I held positions in Engineering, Strategic Market Planning, Technology Planning, and Operations. In my most recent previous position with Sprint, I managed large complex interdepartmental projects such as NPA relief activities. I managed NPA relief projects for Sprint from 1988 to 1999, including the implementation of interchangeable NPA and CO codes and local number portability.

I also teach mathematics, statistics, project management, and general management courses at both the undergraduate and graduate level at the University of Phoenix.

1 Q. Have you ever appeared as a witness before the Florida Public Service
2 Commission (“Commission”) before?

3 A. Yes. I appeared as a witness on behalf of NeuStar in the 305/786, 561, 941, 954
4 and 904 NPA relief proceedings. Before I accepted my position at NeuStar, I
5 appeared as a witness on behalf of Sprint in several proceedings before the
6 Commission.

7

8 Q. What is the purpose of your testimony?

9 A. I offer this testimony to explain NANPA’s role in determining the exhaust of the
10 813 NPA in response to a letter from the Commission staff. The staff requested
11 that I file pre-filed direct testimony explaining the effects Verizon’s proposal to
12 create five LERG rate centers out of the existing single Tampa rate center will
13 have on the assignment of CO codes and on the projected exhaust date of the 813
14 NPA. The 813 NPA is located in the Tampa, Florida area.

15

16 Q. Please define LERG.

17 A. LERG is the acronym for Local Exchange Routing Guide. It is a database used
18 by the Telecommunications Industry for identifying the assigned Central Office
19 Codes and other pertinent routing information. It is produced by Telcordia
20 Technologies, Inc. and is available by subscription from them.

21

1 Q. What is the projected exhaust date of the 813 NPA?

2 A. The 2000 Central Office Code Utilization Survey and NPA Exhaust Analysis,
3 May 23, 2000 Update ("2000 COCUS") projections for CO codes indicated that
4 the 813 NPA is expected to exhaust during the fourth quarter of 2006.

5

6 Q. Did you prepare the analysis requested by the Commission staff?

7 A. Yes, I did. Before I provide the results, I wish to identify and explain the
8 assumptions I used.

9

10 The first assumption is that the carriers identified in the LERG as having
11 operations within the 813 NPA are accurate and each carrier uses only one
12 Operating Company Number ("OCN"). Second, I did not assume any new
13 carriers entering the market in the Tampa area beyond those listed in the LERG. I
14 based my calculations upon information obtained from the January 2001 issue of
15 the LERG. Third, I assumed that, based solely upon the creation of four new rate
16 centers, the wireless carriers with CO codes in the Tampa rate center would not
17 require any additional codes. Finally, I assumed Verizon has sufficient CO codes
18 in the proposed rate centers.

19

20 Neither NANPA, nor I, has any specific knowledge as to the business strategy,
21 expansion plans or customer distribution of any of the carriers in the Tampa area.

22

1 Q. Given those assumptions, what were the results of your analysis?

2 A. There are 32 wireline carriers that have CO codes in the Tampa rate center.

3 Excluding Verizon, the predominant local exchange carrier (“LEC”), the wireline
4 carriers hold 65 CO codes in the Tampa rate center. The forecasted growth of the
5 813 NPA is approximately four CO codes per month. For my calculations, I first
6 analyzed a worst case scenario in which each wireline carrier would need a CO
7 code in each of the new rate centers for each code it has in service now.

8

9 If each of the 65 CO codes needs to be replicated in the four additional proposed
10 rate centers, an additional 260 CO codes would be required.

11

12 Q. Did you analyze any other scenarios?

13 A. Yes, I considered the possibility that the existing CO codes would be redistributed
14 and new CO codes would be assigned so that each carrier would hold a minimum
15 of one code in each of the new rate centers.

16

17 Q. What would be the effect of such a redistribution?

18 A. Fifteen carriers have one CO code, seven have two, three have three, four have
19 four codes, one has five, and one has six. For each carrier to hold a minimum of
20 one code in each of the new rate centers, these carriers will need four codes, three
21 codes, two codes, and one code, respectively. The carriers with five and six CO
22 codes will not need additional resources.

1

2 Using the above assumptions, a total of 91 CO codes will be needed to
3 accomplish this proposed change.

4

5 Q. What are the consequences of redistributing CO codes to the new rate centers?

6 A. A portion of the customers of the affected carriers that receive new CO codes
7 would be required to change their telephone numbers. I have no way of
8 estimating the number of affected customers.

9

10 Q. What effect would assignment of 260 CO codes have on the projected exhaust of
11 fourth quarter 2006 for the 813 NPA?

12 A. The assignment of 260 CO Codes in the 813 NPA would place the 813 NPA in
13 jeopardy of exhaust before NPA relief could be accomplished. The exhaust date
14 would accelerate to the third quarter 2001.

15

16 Q. Why would this put the 813 NPA into jeopardy?

17 A. With the earlier third quarter 2001 exhaust date, insufficient CO code resources
18 would be available, without rationing, to allow for relief to be implemented prior
19 to exhaust.

20

1 Q. What would be the effect on the exhaust of the 813 NPA if only 91 codes were
2 required?

3 A. In that instance, the exhaust date would be accelerated to the fourth quarter 2004;
4 about two years earlier.

5

6 Q. Is there a possibility that fewer than 91 NXX codes would be required?

7 A. Yes, that is a possibility. As I noted earlier, I have no specific knowledge of
8 where any carrier's customers are physically located or its business plans. There
9 is the possibility that a carrier could have all its customers in a single proposed
10 rate center and not need any additional numbering resources until it expanded
11 beyond that boundary. I made the assumption, as I noted, that each carrier would
12 need a presence in each of the new rate centers.

13

14 Q. Does this conclude your testimony?

15 A. Yes, it does.

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that the foregoing **Pre-Filed Direct Testimony** was mailed on this 20th day of February, 2001, via U.S. First Class Mail, to the following individuals listed on the Florida Public Service Commission's service list for Docket Number 010102:

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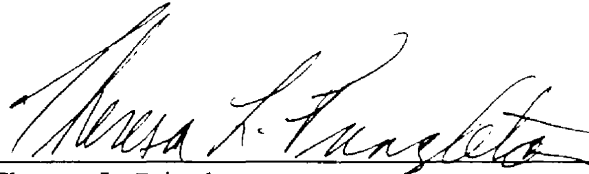
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