

ORIGINAL



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February 21, 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. 010102-TP
Investigation of Proposed Updates to the Routing Data Base System (RDBS)
and Business Rating Input Database System (BRIDS) Affecting the Tampa
Telecommunications Carriers

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of the Direct Testimony of
Beverly Y. Menard on behalf of Verizon Florida Inc. in the above matter. 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,

Kimberly Caswell

- APP _____
- CAF _____
- CMP _____
- COM 3 _____
- CTR _____
- ECR _____
- LEG 1 _____
- OPC _____
- PAI _____
- RGO _____
- SEC 1 _____
- SER _____
- OTH _____

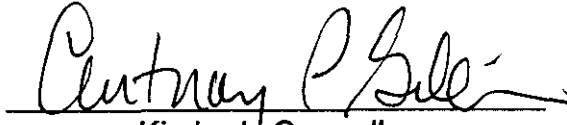
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02412 FEB 21 01
FPSC-RECORDS/REPORTING

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. 010102-TP were sent via U.S. mail on February 21, 2001 to the parties on the attached list.


for Kimberly Caswell

DOCUMENT NUMBER-DATE

02412 FEB 21 01

FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of proposed updates to)
the Routing Data Base System (RDBS) and)
Business Rating Input Database System (BRIDS)) Docket 010102-TP
affecting the Tampa telecommunications)
carriers)

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

February 21, 2001

DOCUMENT NUMBER-DATE
02412 FEB 21 01
FPSC-RECORDS/REPORTING

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 issues identified for resolution in association with the recognition of
23 Verizon's existing five Tampa rate centers.

24

25

1 **Q. DO YOU KNOW WHEN THE FIVE RATE CENTERS IN TAMPA**
2 **WERE ESTABLISHED?**

3 A. No. In reviewing Verizon's records, we have not been able to find any
4 records which reflect this information. However, we believe that they
5 have existed for at least 30 years, as the Commission's report on
6 extended area service (EAS) routes shows EAS was established
7 between Tampa South and Palmetto in 1969 and Tampa North and
8 Zephyrhills in 1970.

9
10 **Q. WHAT ARE THE LOCAL EXCHANGE ROUTING GUIDE (LERG)**
11 **AND ROUTING DATABASE SYSTEM (RDBS)?**

12 A. The LERG is a document which gives information on all switches in
13 the public switched telephone network and enables carriers to know
14 where an NXX code resides in the network (i.e., which carrier is
15 responsible for making assignments for the NXX code). LERG is an
16 output product of RDBS. The RDBS is the Telcordia system that
17 houses NPA-NXX code information and allows carriers to determine
18 how to route calls to the NXX.

19
20 **Q. WHEN THE TAMPA RATE CENTERS WERE ESTABLISHED, WHO**
21 **WAS RESPONSIBLE FOR ASSIGNING NXX CODES IN THE 813**
22 **AREA CODE?**

23 A. GTE Florida Incorporated (now Verizon Florida Inc.) was responsible
24 for assigning the NXX codes. At that time, the 813 area code
25 encompassed all of GTE Florida's territory and Sprint's territory south

1 of GTE (which was subsequently changed to the 941 area code).
2 Until late 1995 or early 1996, GTE and Sprint were the only local
3 exchange carriers in the 813 area code.

4

5 **Q. WHEN GTE ESTABLISHED A NEW NXX CODE, HOW DID SPRINT**
6 **KNOW THE RATE CENTER FOR AN NXX CODE IN THE TAMPA**
7 **AREA?**

8 A. Prior to the transfer of the Florida code administration function, when
9 new NXXs were established, a manual mode of phone calls, faxes,
10 etc. was used to determine the calling scope of any new NXX, since
11 it could not be determined by the LERG assignments. This was due
12 to the fact that the LERG only showed Tampa as the exchange and
13 there was no designation in the LERG showing the proper Tampa rate
14 center.

15

16 **Q. WHAT HAPPENED WHEN ALTERNATIVE LOCAL EXCHANGE**
17 **CARRIERS (ALECS) BEGAN REQUESTING NXX CODES IN THE**
18 **TAMPA AREA?**

19 A. The code administrator would discuss the request with the carrier to
20 determine which Tampa rate center the code would be assigned.
21 Historically, the ALECs' NXXs have been established as a Tampa
22 Central rate center. The rationale was that most ALECs were starting
23 their services for business customers located in the downtown area.
24 As a result, Tampa Central was the code used for the ALEC NXXs in
25 all GTE switches and GTE's billing system.

1 **Q. WHEN DID GTE TRANSFER THE CODE ADMINISTRATION**
2 **FUNCTION?**

3 A. The transfer to Lockheed Martin (now Neustar) occurred on June 6,
4 1998.

5
6 **Q. WHAT WAS LOCKHEED MARTIN'S POSITION ON THE MANUAL**
7 **PROCESS THAT WAS BEING UTILIZED FOR THE FIVE TAMPA**
8 **RATE CENTERS?**

9 A. Lockheed Martin stated that they would not continue the manual
10 process.

11
12 **Q. WHEN DID VERIZON BEGIN REFLECTING THE FIVE TAMPA**
13 **RATE CENTERS IN THE LERG?**

14 A. Verizon is a member of an industry forum called CIGRR (Common
15 Interest Group on Routing and Rating), which discusses RDBS
16 issues. In April 1999, in response to the ongoing industry concerns
17 posed at CIGRR, GTE broke out the localities for its codes to reflect
18 where in the existing five-tariffed rate centers in Tampa the code
19 resided. Since the locality population is at the discretion of the
20 Operating Company Name/Number (OCN), there was no way to
21 insure that other service providers would do the same population.

22
23 **Q. DID VERIZON'S CHANGES TO THE LERG SOLVE THE PROBLEM**
24 **ON THE PROPER RATE CENTER DESIGNATION FOR NEW**
25 **TAMPA NXX CODES?**

1 A. No. At future CIGRR meetings, a continued issue for discussion was
2 the difficulty in knowing how to route and rate the call properly in the
3 network for the Tampa area via the LERG/RDBS. A working group
4 to deal with this issue was formed between representatives from
5 Neustar, Sprint, BellSouth, KMC, GTE Wireless, Telcordia, Alltel and
6 GTE. The group held three conference calls, on April 19, 2000, May
7 17, 2000 and June 28, 2000. As a result of the conference calls, I
8 contacted Commission Staff member Levent Ileri to make him aware
9 of the industry effort to harmonize the LERG with GTE's tariffs. The
10 due date for the conversion was determined in compliance with all
11 current industry guidelines. On August 15, 2000, letters were drafted
12 and sent via registered mail or registered e-mail to all OCNs within the
13 Tampa area by GTE under their new Verizon letterhead. At that time,
14 the new rate center names and localities were requested by Verizon
15 to be built in RDBS by Telcordia. Verizon also went ahead and made
16 all the required changes to their NXXs to show the proper Tampa rate
17 center as the exchange with the planned effective date of February 1,
18 2001. My Exhibit BYM-1, attached, is a copy of the notification that
19 was sent to the affected carriers.

20
21 **Q. SHOULD THE TAMPA MARKET AREA BE CONSIDERED ONE**
22 **RATE CENTER?**

23 A. No. The five Tampa rate centers have been in existence for over 30
24 years. The rate centers do not have the same calling scopes. Exhibit
25 BYM-2, attached, shows the current calling scopes for the five Tampa

1 rate centers. As noted in the exhibit, all the Tampa rate centers have
2 seven-digit dialing between the five Tampa rate centers. However,
3 the Tampa rate centers have different ECS (extended calling service)
4 and EAS calling scopes.

5

6 **Q. IS VERIZON ADVOCATING THAT THE ALECS HAVE TO USE THE**
7 **SAME LOCAL CALLING AREAS AS VERIZON?**

8 A. No. An ALEC is free to determine the local calling areas for its own
9 customers. However, for Verizon customers, an ALEC NXX code has
10 to be reflected in the LERG with only one of the five Tampa rate
11 center designations so that Verizon knows how to correctly rate the
12 call for calls made to the NXX from Verizon end users.

13

14 An ALEC could choose to have all calls from their end users treated
15 as local calls for any calls they originate and terminate in the Verizon
16 territory. However, they must have an NXX for each Verizon rate
17 center where the ALEC customers are physically located. This
18 requirement applies whether the customer is located in Tampa
19 Central, Tampa North, Clearwater or New Port Richey.

20

21 **Q. DO VERIZON'S TARIFFS REFLECT THE FIVE TAMPA RATE**
22 **CENTERS FOR TOLL CALLS?**

23 A. Yes. Section A18 of the tariff shows the five Tampa rate centers and
24 the required information for rating toll calls.

25

1 **Q. HOW WOULD MULTIPLE RATE CENTERS AFFECT THE**
2 **NUMBERING RESOURCES IN THE TAMPA MARKET AREA?**

3 A. If ALECs desire to serve customers who are located in all five Tampa
4 rate centers, they would require additional NXX codes. Verizon is
5 very cognizant of the concern about the potential premature exhaust
6 of the 813 NPA. For these reasons, Verizon worked with Neustar to
7 insure that the proper recognition of the Tampa rate center could be
8 accommodated in the 813 area code. As of May 17, 2000, there were
9 331 codes still available to be assigned in the 813 area code. The
10 current date projected for area code relief in the 813 area code is
11 fourth quarter 2006.

12
13 As a result of the FCC's Report and Order in CC Docket No. 99-200,
14 released March 31, 2000, the Tampa MSA (which includes the 813
15 area code) will eventually be on the FCC's implementation schedule
16 for thousand block number pooling. However, the implementation
17 schedule is unknown at this time. The implementation of thousand
18 block number pooling should help conserve numbering resources in
19 the 813 area code.

20
21 **Q. WHAT EFFECT WILL VERIZON'S CHANGES TO ITS ROUTING**
22 **DATABASE SYSTEM (RDBS) AND BUSINESS RATING**
23 **INFORMATION DATABASE SYSTEM (BRIDS) HAVE ON OTHER**
24 **TELECOMMUNICATIONS CARRIERS IN THE TAMPA MARKET**
25 **AREA?**

1 A. The first thing that carriers will have to do is to determine which
2 Tampa rate center that their customers actually occupy. After the
3 notifications were sent, a number of conference calls were held with
4 various members of the ALEC industry to help explain the changes
5 and the impact they would have on the ALECs. As a result of the
6 conference calls, a number of exhibits were prepared to assist the
7 ALECs in determining the proper rate center for their customers.
8 Exhibit No. BYM-2 was done to outline the various Tampa rate
9 centers and the calling scopes of the rate centers. An initial list was
10 prepared and sent to the ALECs to identify the zip codes by rate
11 center. I then got a series of maps for Tampa and using the legal
12 descriptions contained in Section A200 of the tariffs (which was
13 discussed with the ALECs for use in identifying the boundaries of the
14 rate centers), I refined the list of zip codes and then sent it to the
15 carriers. The attached Exhibit BYM-3 contains the zip code listing.
16 In addition, I offered that any ALEC could e-mail me addresses and
17 we would verify them in our databases and let them know the proper
18 Tampa rate center for the address.

19
20 As a result of the ALECs' concerns about the ability to identify the
21 proper rate centers for their customers, I requested a listing of all
22 ALEC numbers in the 813 area code from our 911 database (the
23 extract was done as of October 20, 2000). I then went through the list
24 and looked up every address in the post office database to determine
25 the zip code for the address. Using the information in Exhibit BYM-3,

1 many addresses were then easily associated with their proper rate
2 center. For the addresses that were not immediately identifiable, I
3 then looked at my street address map to identify the proper rate
4 center. As a result, I prepared an analysis showing the results of my
5 study. I looked up over 58,000 addresses. The summary results are
6 shown in the attached Exhibit BYM-4, which was provided to the
7 FPSC staff and the ALECs, showing that for the rate centers which
8 are simply shown as Tampa in the LERG (since some ALECs have
9 started showing the proper Tampa rate centers in the location field of
10 the LERG), over 98 percent of the customers using these ALEC
11 codes are physically located in the Tampa Central rate center.
12 Therefore, Tampa Central is the proper rate center for these existing
13 codes.

14

15 **Q. IF AN ALEC IS SERVING CUSTOMERS WHO ARE NOT**
16 **PHYSICALLY LOCATED IN THE TAMPA CENTRAL RATE**
17 **CENTER, IS VERIZON ADVOCATING THAT THESE CUSTOMERS**
18 **MUST CHANGE THEIR TELEPHONE NUMBER?**

19 A. No. Verizon recommends that existing customers should be
20 considered grandfathered in the Tampa Central rate center as long as
21 they stay with the existing ALEC, even if they are not physically
22 located in the Tampa Central rate center. They would be allowed to
23 add lines in the ALEC's NXX.

24

25

1 Of course, if a customer decided to return to Verizon for service and
2 they are not physically located in the Tampa Central rate center, the
3 customer would be required to take a number change, in accordance
4 with the current local number portability guidelines. Verizon is not
5 trying to penalize any existing customers or ALECs.

6

7 **Q. WHY WOULD A CUSTOMER BE REQUIRED TO CHANGE HIS**
8 **PHONE NUMBER IF THEY WANTED VERIZON TO SERVE THEM?**

9 A. When the FCC implemented number portability, service provider
10 number portability was implemented. This allows a customer to move
11 from one provider to another, while remaining at the same location.
12 Under the guidelines which were developed, a customer is only
13 allowed to port between carriers within the same rate center. If the
14 customer is physically located in the Tampa North rate center, the
15 customer must be assigned to an NXX which is associated with the
16 Tampa North rate center. If the ALEC's NXX code is assigned to the
17 Tampa Central rate center, the customer must change his number for
18 Verizon to be able to serve him. This is the only way that Verizon can
19 insure that the customer's calls get billed in the same manner as all
20 other customers located in the same rate center.

21

22 **Q. HAS VERIZON'S RECOGNITION IN THE LERG OF THE EXISTING**
23 **FIVE TAMPA RATE CENTERS HAD ANY IMPACT ON LOCAL**
24 **NUMBER PORTABILITY (LNP)?**

25 A. No. Tampa became LNP-capable in September, 1998. The FCC

1 required LNP deployment in all of the top 100 Metropolitan Statistical
2 Areas (MSAs) by year end 1998. Verizon chose voluntarily to move
3 beyond the minimum requirements of the FCC order and completed
4 LNP implementation in all of our Florida locations effective August,
5 1999.

6
7 The requirement for a customer to change their phone number if they
8 were not physically located in the Tampa Central rate center, but were
9 served by a Tampa Central ALEC NXX code and wanted to be served
10 by Verizon has existed since September, 1998.

11
12 The issues associated with the five Tampa rate centers and LNP were
13 discussed in the LNP workshops held with FPSC staff during October,
14 1997. The five rate areas in Tampa have been explained in
15 numerous industry meetings since the industry started deploying LNP.

16

17 **Q. WHAT ARE SOME OF THE DIFFERENCES IN A CUSTOMER'S**
18 **CALLS DEPENDING ON THE TAMPA RATE CENTER WHERE HE**
19 **IS LOCATED?**

20 **A.** When a customer is located in Tampa Central or Tampa North, calls
21 to Dade City and San Antonio (both in Sprint's territory) are ECS
22 calls. If the customer is located in Tampa East, South or West, calls
23 to Dade City and San Antonio are toll calls. If a customer is located
24 in Tampa South, calls to Palmetto are local calls. If the customer is
25 located in any other Tampa rate center, calls to Palmetto are toll calls.

1 **Q. WHAT IMPACT DOES VERIZON'S RECOGNITION OF THE**
2 **EXISTING FIVE TAMPA RATE CENTERS IN THE LERG/RDBS**
3 **HAVE ON ALECS?**

4 A. It has no immediate impact whatsoever. There have been no
5 changes to rating or routing as a result of Verizon's recognition of the
6 existing Tampa rate centers. There has been a perception that
7 recognizing the Tampa rate centers in the LERG changes the ALEC's
8 calling scope to one-fifth the calling scope they currently have. As
9 discussed previously, the ALEC's codes have been recognized as
10 Tampa Central rate center codes if there is no designation in the
11 LERG. As shown on Exhibit BYM-2, the calling scopes for each
12 Tampa rate center are very comparable. However, the ALEC codes
13 need to be shown in the LERG with the proper Tampa rate center so
14 there is no question as to the rate center where the customers are
15 located. Any new NXX codes need to be established with the correct
16 Tampa rate center designation. This is no different than any other
17 rate center in Verizon's territory.

18
19 **Q. IF ALECS START USING THE CORRECT TAMPA RATE**
20 **CENTERS, WILL THIS HAVE AN IMPACT ON INTERCARRIER**
21 **COMPENSATION?**

22 A. It should not. In Verizon's interconnection agreements, local, EAS
23 and ECS traffic are all treated as local service for compensation
24 purposes. As shown in Exhibit BYM-2, the calling scopes for all
25 Tampa rate centers are comparable.

1 **Q. SHOULD A NUMBER POOLING TRIAL BE IMPLEMENTED IN THE**
2 **TAMPA METROPOLITAN STATISTICAL AREA (MSA)? IF SO,**
3 **WHEN SHOULD THE NUMBER POOLING TRIAL BEGIN?**

4 A. Verizon is not opposed to a number pooling trial for the Tampa MSA.
5 The Tampa MSA encompasses both the 813 and 727 area codes. If
6 a number pooling trial is implemented, a pooling administrator will
7 have to be selected. After the pooling administrator is selected,
8 industry meetings will need to be held with all affected carriers to
9 establish the time frames for the implementation of pooling. A new
10 pooling trial will need to be coordinated with the other pooling trials
11 that are already scheduled. Verizon believes that it could be ready to
12 implement a pooling trial six months after a Commission order
13 establishing a pooling trial.

14
15 **Q. WHAT OTHER NUMBER CONSERVATION MEASURES, IF ANY,**
16 **SHOULD THE COMMISSION IMPLEMENT IN THIS DOCKET?**

17 A. The Commission should not implement any additional conservation
18 measures in this docket other than consideration for a number pooling
19 trial. As a result of the FCC's decisions in 2000, a number of
20 conservation measures are already being implemented on a
21 nationwide basis. Any other such measures should be considered in
22 the generic Docket Number 981444-TP, so they can be done on a
23 uniform basis throughout the state and all affected parties can
24 participate in the proceeding.

25

1 **Q. HOW SHOULD COST RECOVERY BE ESTABLISHED IF THE**
2 **COMMISSION ORDERS A NUMBER POOLING TRIAL?**

3 A. Docket Number 001503-TP has already been established to deal with
4 the cost recovery for the pooling trials that have already been
5 scheduled. It is anticipated the results of this docket would apply for
6 any number pooling trials that are established.

7

8 **Q. SHOULD VERIZON BE ORDERED TO IMPLEMENT RATE CENTER**
9 **CONSOLIDATION IN THE TAMPA MARKET AREA?**

10 A. No, not at this time. This area encompasses a large geographical
11 area. It contains most of Hillsborough county, a portion of Pinellas
12 county, and a large portion of the Pasco county area contained in
13 Verizon's territory. Exhibit BYM-5 is a map showing the Verizon rate
14 centers and county boundaries.

15

16 As part of the Commission's work on rate center consolidation,
17 Verizon looked at the possibility of combining the five Tampa rate
18 centers. However, it was determined that the revenue impact would
19 be too large. Therefore, the task force report submitted to the
20 Commission Staff on September 28, 2000 only proposed combining
21 the Tampa South and Tampa East rate centers. It was also proposed
22 to combine the Tampa North rate center with the Zephyrhills
23 exchange. The potential revenue requirement that would have to be
24 recovered for the 813 area code for the proposed rate center
25 consolidations was \$6,500,000.

1 **Q. WERE THERE ANY ISSUES IDENTIFIED WITH RATE CENTER**
2 **CONSOLIDATION?**

3 A. Yes. There were two main issues. One was whether the Commission
4 has the authority to order rate center consolidation. The other issue
5 identified by the ILECs is that their support for rate center
6 consolidation was premised on the capability to cover the revenue
7 loss and the cost of implementing rate center consolidations.

8
9 **Q. DO YOU BELIEVE THE COMMISSION HAS THE AUTHORITY TO**
10 **ORDER RATE CENTER CONSOLIDATIONS FOR VERIZON?**

11 A. No, I do not. While I am not an attorney, there have not been any
12 additional EAS or ECS dockets established for price-regulated ILECs
13 since Chapter 364 was modified effective July 1, 1995. The rationale
14 is contained in Section 364.385(2), Florida Statutes, which provided
15 that all applications for extended area service or extended calling
16 service pending before the Commission before March 1, 1995 were
17 governed by the law that existed prior to July 1, 1995. No new
18 proceedings governed by the law as it existed prior to July 1, 1995
19 could be initiated after July 1, 1995. Since consolidation of any
20 Tampa rate centers would involve mandating additional EAS or ECS
21 calling areas, it does not appear the Commission has the authority to
22 order the consolidations under Chapter 364.

23
24 **Q. DOES VERIZON HAVE ANY ADDITIONAL CONCERNS WITH**
25 **RATE CENTER CONSOLIDATIONS?**

1 A. Yes. In recent years, Verizon has embraced rate center
2 consolidation where it could be implemented without impact to our
3 revenues or proper 911 call routing. Recently, the FCC provided an
4 interpretation of the FCC Numbering Resource Optimization (NRO)
5 Order to the North American Number Plan Administrator (NANPA)
6 which resulted in Verizon being denied the codes it had requested.
7 When Verizon inquired as to why NANPA declined the code requests,
8 Verizon was told that the FCC had instructed NANPA to begin
9 managing numbering resources at a rate center level. This new
10 approach means that any carrier with multiple switches in the same
11 rate center would be required to move numbers from a switch with
12 more than six months of numbering resources to another switch within
13 the rate center that was nearing number exhaust. Verizon does not
14 have the system capability to accommodate such a requirement.
15 Investigation is underway to determine how much system
16 enhancement will be required, but in the interim, we cannot support
17 rate center consolidation where the final result would be a rate center
18 with multiple Verizon switches. Since each Tampa rate center
19 contains multiple switches, Verizon cannot support any additional rate
20 center consolidations at this time.

21

22 **Q. WHAT IS VERIZON'S RECOMMENDATION ON RATE CENTER**
23 **CONSOLIDATION AT THIS TIME?**

24 A. The issues of the Commission's authority for rate center consolidation
25 and recovery of revenue losses and cost of implementing rate center

1 consolidation should be dealt with in Docket No. 981444-TP, the
2 proceeding intended to generically address such issues. Once these
3 issues are resolved, it would take twelve to eighteen months to
4 implement any rate consolidation plan.

5

6 **Q. SHOULD VERIZON BE REQUIRED TO UNDO CHANGES MADE**
7 **PRIOR TO AUGUST 15, 2000, IN ITS RDBS AND BRIDS**
8 **SYSTEMS? IF SO, SHOULD VERIZON BE REQUIRED TO FILE A**
9 **REVISED TARIFF REFLECTING ONE TAMPA RATE CENTER?**

10 A. Absolutely not. As discussed previously, I do not believe the
11 Commission has the authority to require all Tampa rate centers to be
12 consolidated to one rate center. Verizon cannot support any rate
13 consolidation without recovering its revenue losses and the costs of
14 implementing rate center consolidation.

15

16 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

17 A. Yes. Throughout this process, there has been a misconception
18 relative to the Tampa rate center. Verizon is not converting,
19 expanding, or changing the currently tariffed Tampa rate centers. It is
20 only correcting the RDBS system and its output products to match
21 what is currently reflected in the tariff and its switches. Verizon is
22 eliminating a manual process which existed when GTE was the
23 Florida Code Administrator, and that was not continued after the
24 transition of the function to Lockheed-Martin, now Neustar. The only
25 conservation measure which should be considered in this proceeding

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is whether a number pooling trial should be implemented for the Tampa MSA.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

INTERCOMPANY CORRESPONDENCE



August 15, 2000

Reply To:
HQB11A06 – Irving, TX

To: Tampa Florida Industry Player

Subject: TAMPA Rate Center

This correspondence is to inform you of the forthcoming update to Telcordia's RDBS (Routing DataBase System) and BRIDS (Business Rating Input Database System) repositories to bring their LERG (Local Exchange Routing Guide) and V+H/TPM (Vertical and Horizontal Terminating Point Master) output products in sync with current Florida tariff language. The current effective date for this activity is February 1, 2001. The Florida PSC (Public Service Commission) is aware of this sync-up effort to tariff compliance.

If you are a code holder in the Tampa area, this most likely will impact your entries in RDBS and BRIDS.

The original and current tariff language reflects five specific rate centers: Tampa-North (TAMPANTH), Tampa-Central (TAMPACEN), Tampa-West (TAMPAWST), Tampa-East (TAMPAEST) and Tampa-South (TAMPASTH). At this time RDBS reflects only the rate center name of TAMPA.

All code holders should submit appropriate part 1 forms to NANPA (North American Numbering Plan Administrator) to correctly reflect the rate center of their code(s) as specified above in parentheses. NANPA has agreed that multiple codes may be submitted on one form per new rate center per OCN (Operating Company Name). However, all paperwork must comply with the minimum industry guideline time interval of 66 days.

Based upon the existing localities in RDBS we have included direction as to which rate area that locality would exist.

<u>TAMPASTH</u> <u>Tampa South</u>	<u>TAMPAEST</u> <u>Tampa East</u>	<u>TAMPAWST</u> <u>Tampa West</u>	<u>TAMPACEN</u> <u>Tampa Central</u>	<u>TAMPANTH</u> <u>Tampa North</u>
APOLLO BCH	BRANDON	CITRUSPARK	GIBSONTON	LANDOLAKES
BALM	LIMONA	ODESSA	INTERBAY	LUTZ
RUSKIN	LITHIA	OLDSMAR	MACDILLAFB	
SUN CITY	SEFFNER		MANGO	
WIMAUMA	THONOTOSSS		PORT TAMPA	
	VALRICO		RIVERVIEW	
			SULPHURSPG	
			TEMPLETRRC	

If you need further assistance with which rate center your switch/code is to reside, please refer to the boundary maps included in the tariff.

Please ensure that your decisions and updates to RDBS are timely to ensure correct routing and completion of calls for your subscribers.

Thank you,

Janice M. Goebel
Staff Specialist – Service Activation
VERIZON (f.k.a. GTE)
545 E John Carpenter Freeway
MC: HQB11A06
Irving, TX 75062

Rate Center	Verizon Central Offices	CLLI	EAS	ECS
Tampa Central	Alafia	ALFAFLXA	Plant City	Clearwater
	Bayshore	BYSHFLXA		Dade City (Sprint)
	Beach Park	BHPKFLXA		Mulberry
	Carrollwood	CRWDFLXA		San Antonio (Sprint)
	East	TAMPFLXE		St. Petersburg
	Hyde Park	HYPKFLXA		Tarpon Springs
	Tampa Main	TAMPFLXX		Zephyrhills
	Seminole	SMNLFLXA		
	Sulphur Springs	SLSPFLXA		
	Sweetwater	SWTHFLXA		
	Temple Terrace	TMTRFLXA		
	University	UNVRFLXA		
	Wallcraft	WLCRFLXA		
	Westside	WSSDFLXA		
Ybor	YBCTFLXA			
Tampa East	Brandon	BRNDFLXA	Plant City	Clearwater
	Thonotosassa	THNTFLXA		Mulberry
				St. Petersburg
				Tarpon Springs
				Zephyrhills
Tampa North	Land O' Lakes	LNLKFLXA	Plant City	Clearwater
	Lutz	LUTZFLXA		Zephyrhills
	Wesley Chapel	WLCHFLXA	Mulberry	
			New Port Richey	
		San Antonio (Sprint)		
				St. Petersburg
				Tarpon Springs
Tampa South	Ruskin	RSKNFLXA	Palmetto	Clearwater
	Wimauma	WIMMFLXA	Plant City	Mulberry
				St. Petersburg
				Tarpon Springs
				Zephyrhills
Tampa West	Keystone	KYSTFLXA	Clearwater	Mulberry
	Oldsmar	OLDSFLXA	Plant City	New Port Richey
				St. Petersburg
				Tarpon Springs
				Zephyrhills

Note: All Tampa rate centers have local calling to all Tampa rate centers.

Zip Codes in the Tampa Rate Center

<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33534	33527*	33543*	33503	33626
33602	33565*	33544*	33547	34677*
33603	33587*	34610*	33570	
33604	33594	34639*	33586	
33605		34669*	33598	
33606				
33607				
33608				
33609				
33610				
33611				
33612				
33613				
33614				
33616				
33617				
33618				
33620				
33621				
33624				
33629				
33634				
33637				

Shared Zip Codes in the Tampa Rate Center

<u>Central</u>	<u>East</u>	<u>North</u>	<u>South</u>	<u>West</u>
33510	33510 (mainly)			
33511	33511 (mainly)			
33547*	33547* (mainly)			
33549		33549 (mainly)		33549 (smidgen)
33556 (small)				33556 (mainly)
33569 (mainly)	33569		33569	
33572			33572 (mainly)	
33573 (smidgen)			33573 (mainly)	
33584	33584			
33592 (smidgen)	33592 (mainly)			
33615 (mainly)				33615
33619 (mainly)	33619 (smidgen)			
33625				33625
33635				33635 (mainly)
33647	33647	33647		

* Zip code also includes exchanges outside the Tampa rate center

ALEC Codes in 813 NPA Tampa Exchange

	No. of Codes	Total	Central	East	North	South	West	Non-Tampa
Designated Tampa Rate Centers								
No Assignments	7							
Assignments	6							
Total	13	471	370	45	30	0	24	2
Percentage			78.56%	9.55%	6.37%	0.00%	5.10%	0.42%
Excl. Non-Tampa			78.89%	9.59%	6.40%	0.00%	5.12%	
Non Designated Tampa Rate Centers								
No Assignments	22							
Assignments	31							
Total	53	59385	58366	72	82	19	576	270
Percentage			98.29%	0.12%	0.14%	0.03%	0.97%	0.45%
Excl. Non-Tampa			98.73%	0.12%	0.14%	0.03%	0.98%	
All Tampa Rate Centers								
No Assignments	29							
Assignments	37							
Total	66	59856	58736	117	112	19	600	272
Percentage			98.13%	0.20%	0.19%	0.03%	1.00%	0.45%
Excl. Non-Tampa			98.57%	0.20%	0.19%	0.03%	1.01%	

