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February 21, 2001

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 010102-TP


Dear Ms. Bayó:

Enclosed for filing on behalf AT&T Communications of the Southern States, Inc. and AT&T Wireless Services are an original and fifteen copies of The Direct Testimony of Felicia Anne Henderson on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

  
for Floyd R. Self

FRS/amb  
Enclosure

cc: Marsha Rule, Esq.  
Parties of Record

DOCUMENT NUMBER-DATE

02436 FEB 21 01

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of The Direct Testimony of Felicia Anne Henderson on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services in Docket 010102-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 21st day of February, 2001.

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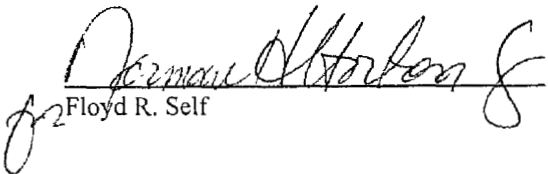
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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. 010102-TP

**DIRECT TESTIMONY OF FELICIA ANNE HENDERSON**

**ON BEHALF OF**

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.**

**AND**

**AT&T WIRELESS SERVICES**

**February 21, 2001**

1       **Q.     PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.**

2       A.     My name is Felicia Anne Henderson, and my business address is 1200  
3             Peachtree Street, N.E., 6W09, Atlanta, Georgia 30309. I am employed as a  
4             Numbering Resource and Project Manager in the Network Architecture and  
5             Development organization.

6       **Q.     BRIEFLY OUTLINE YOUR EDUCATIONAL BACKGROUND AND**  
7             **BUSINESS EXPERIENCE IN THE TELECOMMUNICATIONS**  
8             **INDUSTRY.**

9       A.     I attended Clayton State College and University in Morrow, Georgia. I began  
10            my career with AT&T Long Lines in 1983. At divestiture, January 1, 1984, I  
11            continued on with AT&T working in the Support Services organization. In  
12            1989, I was promoted to management and began working with Network  
13            Services supporting the Southeast On-Site-Work Group as the Administrative  
14            Supervisor. In 1996, I transferred over to Customer Connectivity beginning  
15            my career in the Numbering arena supporting local entry, number portability,  
16            and number conservation matters.

17       **Q.     HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE**  
18             **PUBLIC SERVICE COMMISSIONS?**

19       A.     No.

20       **Q.     ON WHOSE BEHALF ARE YOU APPEARING IN THESE**  
21             **PROCEEDINGS?**

22       A.     I am appearing on behalf of AT&T Communications of the Southern States,

1 Inc. and AT&T Wireless Services, a commercial mobile radio services  
2 (“CMRS”) provider, which have intervened in this docket (which I will  
3 collectively refer to as “AT&T”).

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. The purpose of my testimony is to provide AT&T’s position concerning the  
6 changes in Rate Center administration initiated by Verizon Florida, Inc.  
7 (formerly GTE Florida, Inc.) in Tampa, Florida.

8 **Q. WHAT IS A RATE CENTER?**

9 A. A Rate Center is an area that uses a common surrogate point for call  
10 origination or termination when determining point-to-point local or toll  
11 calling charges. A Rate Center is known by its Rate Center Name (e.g.,  
12 Tampa) and the point used to define its location is a Vertical and Horizontal  
13 Coordinate (“V&H Coordinate”) expressed in a paired number value (e.g.,  
14 08173-01147). Rate Centers are used within the assignment, routing and  
15 rating/billing databases in the telephone industry. With few exceptions,  
16 every telephone number in the North American Numbering Plan (“NANP”) is  
17 associated with one and only one Rate Center.

18 **Q. WHY IS RATE CENTER STRUCTURE IMPORTANT TO THE**  
19 **STATE OF FLORIDA?**

20 A. There are several reasons why the Florida Commission should be concerned  
21 about how Rate Centers are applied to telephone numbers.

- 22
- Numbering resources are acquired at the Rate Center level.

- 1 • Customer number porting is generally limited to within Rate Center  
2 boundaries.
- 3 • Customer calling charges are often based on the distance between  
4 Rate Center points, and the names of those Rate Centers commonly  
5 appear on customer billing detail to identify the distant point involved  
6 in a charged call.
- 7 • The Federal Communications Commission (“FCC”) has established  
8 many rules that use the Rate Center as a reference point.
- 9 • Industry groups, such as the Industry Numbering Committee (“INC”),  
10 develop guidelines for telephone company behavior that rely on the  
11 common application of Rate Centers within carrier networks.
- 12 • Porting of telephone numbers must occur only within a Rate Center.
- 13 • Interconnection agreements between incumbent Local Exchange  
14 Carriers and Alternative Local Exchange Carriers often require that  
15 the ALEC’s local calling scope mimic the incumbent’s local calling  
16 area as defined by the incumbent’s Rate Centers.
- 17 • Pooling of numbers within an MSA is done on a Rate Center level,  
18 (one pool per Rate Center). While it could be argued that the Rate  
19 Center structure is a monopoly paradigm that should pass into history  
20 to allow full competition, it is the current standard for many  
21 customer-billing arrangements, and for inter-carrier compensation,  
22 and call-handling processes. For these reasons, the Florida

1 Commission should be very concerned about how Rate Centers are  
2 established or their designations changed.

3 **Q. HOW ARE RATE CENTERS TYPICALLY ESTABLISHED AND**  
4 **REGULATED?**

5 A. Rate Centers originate from Incumbent Local Exchange Carriers (“ILECs”)  
6 service areas that offer common dialing plans and tariffed rates, as approved  
7 by public utility commissions. A single Central Office (“CO”) switch may  
8 serve a Rate Center, but in densely populated areas ILECs may have two or  
9 more CO switches in a Rate Center.

10 **Q. HOW DOES THE ILEC’S RATE CENTER STRUCTURE AFFECT**  
11 **NEW ENTRANTS’ BUSINESS PLANNING?**

12 A. New entrants are familiar with the Rate Center structure and plan their  
13 networks and number administration around this structure. As I have already  
14 discussed, there are quite a few consequences for all carriers that arise out of  
15 the Rate Center structure.

16 **Q. UNDER WHAT RATE CENTER STRUCTURE DID AT&T**  
17 **INITIALLY ACQUIRE NUMBERING RESOURCES IN TAMPA?**

18 A. AT&T understood that the metropolitan Tampa area was a single Rate Center  
19 called “Tampa.” That was the way the Verizon CO codes showed up in the  
20 Local Exchange Routing Guide (“LERG”). When Verizon, then GTE, was in  
21 charge of assigning the codes, they were assigned to this Tampa Rate Center.

22 **Q. DO YOU KNOW OF ANY EFFORTS THAT WERE MADE TO**

1                   **NOTIFY AT&T THAT THE TAMPA RATE CENTER STRUCTURE**  
2                   **RELIED UPON BY AT&T WOULD ATTEMPT TO BE MODIFIED**  
3                   **BY VERIZON?**

4           A.       The first notice I am aware of came from WorldCom in late September 2000.  
5                   On August 15, 2000, Verizon sent a “Tampa Florida Industry Player”  
6                   memorandum advising of the proposed changes, but I am unaware of to  
7                   whom Verizon sent this document or how widely it was distributed. .

8           **Q.       UNDER WHAT RATE CENTER STRUCTURE DOES VERIZON**  
9                   **CURRENTLY OPERATE IN TAMPA?**

10          A.       Today Verizon has a dual Rate Center structure in place that utilizes six Rate  
11                   Centers. First, Verizon migrated its numbers to the multiple Rate Center  
12                   structure, as far as the LERG is concerned, effective February 1, 2001. This  
13                   means that there are now five geographic Rate Centers in place for the Tampa  
14                   area as Verizon proposed in its August 15, 2000, memorandum. Second, in  
15                   addition to the five geographic Tampa Rate Centers, Verizon has also  
16                   continued the generic or universal Tampa Rate Center that AT&T and other  
17                   carriers have used for years.

18          **Q.       WHAT ACTIONS HAVE BEEN TAKEN BY AT&T TO REACT TO**  
19                   **THE CHANGES FIRST PROPOSED BY VERIZON LAST AUGUST?**

20          A.       At WorldCom’s request, several carriers held a conference call on  
21                   September 29, 2000, to meet to discuss the meaning and implications of  
22                   Verizon’s proposed changes to create five Tampa Rate Centers. Since then,



1           there have been many follow up phone conferences and meetings within  
2           AT&T and among the ALECs to discuss the customer and carrier impacts of  
3           Verizon's proposed changes. In addition to AT&T's participation in these  
4           industry and other calls and meetings, AT&T has attempted to research its  
5           customer base to determine the impacts Verizon's proposed changes would  
6           have on our customers and the way AT&T would have to use, deploy, and  
7           obtain additional numbering resources.

8           **Q.   WHAT ARE THE IMPLICATIONS TO CUSTOMERS IF VERIZON'S**  
9           **ORIGINAL PROPOSAL FOR ONLY FIVE RATE CENTERS IS**  
10           **IMPLEMENTED?**

11          A.   We have serious concerns for the additional NXX codes that would have to  
12           be acquired by AT&T as well as other carriers. We know that AT&T would  
13           have to acquire for its operating companies in Tampa at least four additional  
14           NXX codes in order to meet the needs of our customers. This process may  
15           also require that some customers would have to change their telephone  
16           numbers because their existing numbers would be part of an NXX code  
17           assigned to a different geographic Rate Center. .

18          **Q.   WHAT ARE THE IMPLICATIONS TO CUSTOMERS IF THE DUAL**  
19           **RATE CENTER STRUCTURE OF TODAY IS RETAINED AND**  
20           **THERE ARE FIVE GEOGRAPHIC RATE CENTERS AND ONE**  
21           **UNIVERSAL TAMPA RATE CENTER?**

22          A.   The immediate problem is that customers would not be able to freely port

1 between companies. This problem would arise whenever a customer wished  
2 to port its number from one geographic Rate Center to the generic Tampa  
3 Rate Center or visa versa. Porting under these circumstances would violate  
4 routing requirements since numbers can only be ported within the same Rate  
5 Center. While today, with limited local competition, porting between carriers  
6 is fairly limited, over time this will become a bigger and bigger problem as  
7 more customers switch carriers and wish to retain their telephone numbers.

8 A second problem would be the impact of this dual system with six  
9 Rate Centers on any pooling that may later be implemented in the Tampa  
10 MSA. Pooling is done on a Rate Center basis. Under today's situation, this  
11 would mean not one pool or even five pools but rather six pools – one for  
12 each of the five geographic Rate Centers and one for the universal Tampa  
13 Rate Center. This many pools may have very limited consequences for  
14 number conservation. Only the ALECs in the generic Tampa Rate Center  
15 pool could participate in that pool, whereas Verizon would possibly be the  
16 only carrier participating in the five geographic Rate Center pools. In this  
17 latter situation, Verizon would be pooling only for itself.

18 **Q. WHAT ARE THE IMPLICATIONS FOR NUMBERING RESOURCES**  
19 **IF THE ORIGINAL VERIZON PROPOSAL IS IMPLEMENTED?**

20 A. Unquestionably, the additional NXX codes required by AT&T and other  
21 carriers would lead to the premature exhaust of the 813 NPA, with pooling in  
22 Tampa likely having a very minimal impact on delaying that exhaust. In

1            addition, there will likely be customer confusion and anger by those who  
2            must change their telephone numbers to the new NXX codes.

3            **Q.    WHAT IS AT&T'S RECOMMENDATION TO THE COMMISSION**  
4            **REGARDING THE RATE CENTER STRUCTURE FOR NEW**  
5            **ENTRANTS AND VERIZON IN TAMPA?**

6            A.    There should only be one Rate Center, Tampa; the one that we have used all  
7            along.

8            **Q.    PLEASE SUMMARIZE YOUR TESTIMONY.**

9            A.    If the Verizon proposal for the five geographical Rate Centers is  
10           implemented, NXX codes will be depleted at a faster rate. Some of our  
11           customers will have to take a number change. Many of the efforts that this  
12           Commission has so carefully brought about to effectuate various number  
13           conservation measures would not be implemented in the Tampa area.

14           **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

15           A.    Yes, it does.