

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE (850) 222-0720
TELECOPIER (850) 224-4359
INTERNET www.lawfla.com

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

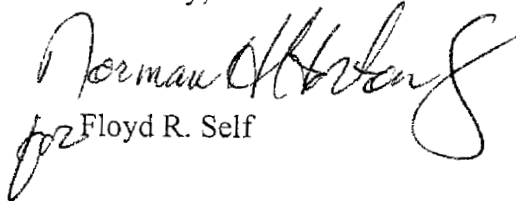
Dear Ms. Bayó:

Enclosed for filing on behalf Intermedia Communications, Inc. are an original and fifteen copies of The Direct Testimony of Kelly Faul on behalf of Intermedia Communications, Inc. 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: Scott Sapperstein, Esq.
Parties of Record

DOCUMENT NUMBER - DATE

02438 FEB 21 01

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of The Direct Testimony of Kelly Faul on behalf of Intermedia Communications, Inc. 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.

Lee Fordham, Esq.*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

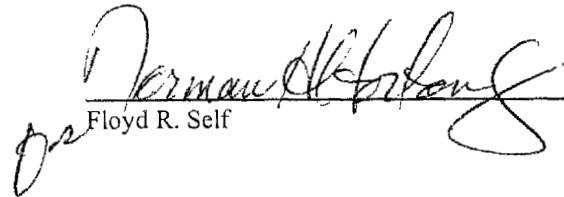
Ms. Michelle A. Robinson
c/o Mr. David Christian
Verizon Florida Inc.
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704

Ms. Harriet Eudy
ALLTEL
206 White Avenue, S.E.
Live Oak, FL 32060-3357

Peter M. Dunbar
Karen M. Camechis
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302

Ms. Rhonda P. Merritt
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

Michael A. Gross
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303


Floyd R. Self

Scott Sapperstein, Esq.
Intermedia Communications, Inc.
One Intermedia Way, M.C. FLT-HQ3
Tampa, FL 33647-1752

Ms. Donna C. McNulty
WorldCom, Inc.
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

NANPA
Tom Foley, Relief Planner
Eastern Region
820 Riverbend Blvd.
Longwood, FL 32779

Mr. F. B. (Ben) Poag
Sprint-Florida, Incorporated
P. O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214

Ms. Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of Proposed)
Updates to the routing Data Base)
System (RBDS) and Business)
Rating Input Database System)
(BRIDS) affecting the Tampa)
telecommunications carriers)
_____)

DOCKET NO. 010102-TP

DIRECT TESTIMONY OF KELLY FAUL

ON BEHALF OF

INTERMEDIA COMMUNICATIONS, INC.

February 21, 2001

1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR FULL NAME, POSITION, AND BUSINESS**
3 **ADDRESS.**

4 A. My name is Kelly Faul. I am employed by Intermedia Communications
5 Inc. as Senior Regulatory Manager, Industry Policy Department. My
6 business address is One Intermedia Way, Tampa, Florida, 33647.

7 **Q. PLEASE DESCRIBE YOUR PRESENT RESPONSIBILITIES,**
8 **WORK EXPERIENCE, AND EDUCATIONAL BACKGROUND.**

9 A. As Senior Regulatory Manager I am responsible for the regulatory
10 activity of Intermedia in a number of areas including numbering,
11 reciprocal compensation, and access charges. I am also responsible for
12 various regulatory reporting and compliance issues. I have been employed
13 by Intermedia since January 2000. Prior to that time I was employed by
14 MCI WorldCom and before that MCI. From 1997 to 2000, I was
15 employed by MCI WorldCom as a Senior Staff Member in its NPA
16 Resource Management group where I represented MCI WorldCom at
17 industry meetings and in regulatory proceeding dealing with area code
18 relief and various numbering issues. From 1994 to 1997, I was Tariff
19 Manager in its Business Markets segment responsible for federal and state
20 tariff filings. From 1984 to 1994, I held various positions in MCI's Office
21 of General Counsel in the area of litigation support. I have a Masters of
22 Business Administration in Management from Virginia Tech and a
23 Bachelor of Science in Business Administration from Wheeling Jesuit

1 University.

2 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY**
3 **COMMISSIONS?**

4 A. Yes. I have testified in various area code and numbering proceedings in
5 Florida, Colorado, New Hampshire, and Connecticut.

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

7 A. The purpose of my testimony is to provide Intermedia's recommendation
8 to the Florida Public Service Commission ("PSC") regarding the rate
9 center structure in the 813 NPA (Tampa area). I will also describe how
10 changes to the rate center structure and to NPA-NXX assignments and
11 allocations will impact Intermedia and its customers .

12

13 **RATE CENTERS AND THEIR PURPOSE**

14 **Q. WHAT IS A RATE CENTER AND WHAT IS ITS PURPOSE?**

15 A. A rate center is a specifically defined geographic area assigned a vertical
16 and horizontal coordinate ("V&H coordinate"). The purpose of the V&H
17 coordinate is that it is one point that identifies that geographic location for
18 rating and routing of calls on the public switched telephone network.

19 **Q. HOW ARE RATE CENTERS USED IN THE RATING AND**
20 **ROUTING OF CALLS?**

21 A. Central office codes, also known as NXXs, are assigned to a specific rate
22 center. Carriers then assign telephone numbers to customers based on the
23 physical location associated with the geographic boundary of the rate

1 center. The customer's rate center will determine its local calling area. It
2 will also determine how long distance calls are rated.

3 **Q. HOW HAS INTERMEDIA HISTORICALLY BEEN REQUESTING**
4 **NPA-NXXS FROM THE NORTH AMERICAN NUMBERING PLAN**
5 **ADMINISTRATOR ("NANPA").**

6 A. It has been requesting, and has been subsequently assigned, NPA-NXX
7 codes in the Tampa rate center. It then assigns customers who are physically
8 located in the Tampa rate center telephone numbers from those NPA-NXXs.
9 It is this Tampa rate center which Verizon is proposing be split into five new
10 rate centers.

11 **Q. WHERE ARE INTERMEDIA'S CUSTOMERS LOCATED?**

12 A. Intermedia has customers located throughout the entire Tampa rate center;
13 our customers are physically located in each of the five new rate centers
14 which Verizon is trying to designate. Intermedia has one rate center tariffed
15 for Tampa.

16

17 **SCENARIO ONE: VERIZON'S FIVE RATE CENTER STRUCTURE**

18 **Q. WHAT CHANGE IN THE CURRENT RATE CENTER STRUCTURE**
19 **AND ALLOCATION OF NPA-NXXS IS VERIZON PROPOSING?**

20 A. Currently, the Local Exchange Routing Guide ("LERG") has one rate center
21 identified for the Tampa area, "Tampa", used by the majority of ALECs.
22 Verizon has changed their structure and split the Tampa rate center into five
23 new rate centers: Tampa Central, Tampa East, Tampa West, Tampa North,

1 and Tampa South effective 2/01/2001. Some ALECs also made this change.

2 **Q. WHAT EFFECT WILL VERIZON'S CHANGES HAVE ON OTHER**
3 **TELECOMMUNICATIONS CARRIERS.**

4 A. Carriers using the one rate center structure, will be required to request
5 additional NPA-NXXs for the new rate centers in order to ensure that
6 customers have service. Intermedia has identified customers in all five of the
7 proposed Verizon rate centers. If ALECs are required to match the new
8 Verizon rate center structure, there will be a run on 813-NXXs and the area
9 code will exhaust prematurely.

10 **Q. WHAT EFFECT WILL VERIZON'S CHANGES HAVE ON**
11 **CUSTOMERS OF THE ALTERNATIVE LOCAL EXCHANGE**
12 **CARRIERS ("ALECS")?**

13 A. While not all customers will see an impact from this change, there are
14 customers who will be required to take telephone number changes.

15 **Q. WHY WOULD SOME CUSTOMERS REQUIRE A TELEPHONE**
16 **NUMBER CHANGE?**

17 A. If a carrier has been assigning telephone numbers from an NPA-NXX in an
18 area physically covered by two or more of these five new rate center, only
19 one of those rate centers will now be allowed to be associated to that NPA-
20 NXX. Some customers may now be located in a different rate center. The
21 new rate center will be assigned a new NPA-NXX and the customer will
22 need to be assigned a new telephone number associated with that new NPA-
23 NXX. Intermedia has customers who will be affected in this way.

1 **Q. WHAT AFFECTS WILL A NEW TELEPHONE NUMBERS HAVE**
2 **CUSTOMERS?**

3 A. Customers will need to notify all family, friends, business associates,
4 vendors, etc. of their new telephone number. Customers will incur costs to
5 change their stationary, business cards, and advertising; any preprogrammed
6 equipment with the old telephone number will need to be reprogrammed.

7 **Q. WILL THERE BE ANY CUSTOMER IMPACTS IN THE FUTURE?**

8 A. Yes, customers who have ported numbers from Verizon that were originally
9 assigned to an NPA-NXX associated with a rate center in which they are no
10 longer located, will be required to take a telephone number change if they go
11 back to a carrier who has different rate center structure and the customer is
12 no longer located in that original rate center.

13 **Q. HOW WOULD THIS SCENARIO AFFECT A POSSIBLE FUTURE**
14 **FLORIDA PSC ORDER FOR RATE CENTER CONSOLIDATION**
15 **IN THE 813 NPA AREA?**

16 A. This change is in effect a reverse rate center consolidation. It achieves the
17 opposite effect of conserving numbers. It is conceivable that the
18 Commission could, in the future, order the five new rate centers to be
19 consolidated back into the old familiar Tampa rate center. This would
20 ultimately be an inefficient use of carriers' resources; the work to split the
21 rate center, then to consolidate them back to the original structure would
22 seem to be a wasteful use of the limited resources available to carriers.

23

1 **SCENARIO TWO: VERIZON USES FIVE RATE CENTERS, OTHER**
2 **CARRIERS USE ONE RATE CENTER**

3 **Q. IF THE PSC ALLOWS VERIZON TO CONTINUE WITH ITS**
4 **CHANGES TO RBDS AND BRIDS AND TO CREATE FIVE RATE**
5 **CENTERS AND ALSO ALLOW ALECS TO MAINTAIN THEIR**
6 **ONE RATE CENTERS STRUCTURE, WILL THIS CREATE ANY**
7 **IMPACTS?**

8 A. Two troubling impacts have been identified in this scenario; one deals with
9 pooling and the other with local number portability (“LNP”)?

10 **Q. HOW WOULD THIS SCENARIO IMPACT POOLING?**

11 A. In a pooling environment, each rate center requires its own pool of thousand
12 number blocks. In the case of six rate centers: Tampa, Tampa Central,
13 Tampa East, Tampa West, Tampa North, and Tampa South; each rate center
14 will require a pool. A total of six pools would be required. And carriers will
15 only be able to donate and receive thousand number blocks from the pool
16 associated with the rate center(s) it uses.

17 **Q. WHAT IMPACTS HAVE BEEN IDENTIFIED WITH LNP AND THE**
18 **TWO RATE CENTER STRUCTURE SCENARIO?**

19 A. There will be customer impacts. Customers who are assigned a number
20 from an NPA-NXX in which Verizon has identified as one of the sub-rate
21 centers, who have ported their number and are now in the Tampa rate center
22 will only be able to port numbers within the Tampa rate center. These
23 customers will not be able to choose Verizon or any other carrier which uses

1 the five rate center structure, and port their numbers, they will have to take a
2 number change.

3

4 **SCENARIO THREE: ALL LECs HAVE ONE RATE CENTER**

5 **Q. WHAT IMPACTS HAVE YOU IDENTIFIED FOR CUSTOMERS IF**
6 **THE ONE RATE CENTER IS MAINTAINED AND NOT SPLIT**
7 **INTO FIVE RATE CENTERS?**

8 A. Intermedia has not identified any impacts to its customers at this time.

9 **Q. WHAT IMPACTS HAVE YOU IDENTIFIED FOR ALECS IF THE**
10 **ONE RATE CENTER IS MAINTAINED AND NOT SPLIT INTO**
11 **FIVE RATE CENTERS?**

12 A. Intermedia has not identified any impacts to ALECs at this time.

13

14 **RECOMMENDATION**

15 **Q. WHAT RECOMMENDATION DO YOU MAKE TO THIS**
16 **COMMISSION IN REGARDS THE PROPOSED CHANGES TO THE**
17 **RATE CENTER STRUCTURE IN TAMPA?**

18 A. Carriers have been assigned NPA-NXXs in the Tampa rate center for many
19 years now. To change the structure now, would not only affect the industry
20 and carriers, but also be costly to some of the telephone customers in the
21 area. This change will be costly to Intermedia and affect its ability to
22 provide seamless, high-quality services to its customers. This Commission
23 should maintain the one rate center structure. The one rate center structure

1 will minimize customer impacts, carrier impacts, and premature exhaust of
2 the area code. At the very least, this Commission should not order any LECs
3 to make changes to its current rate center structure.

4 **CONCLUSION**

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

6 A. Yes, it does.