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March 1, 2001

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

Re: Docket No. 010102-TP
Revised Direct Testimony

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Time Warner Telecom of Florida, L.P., are an original and fifteen copies of revised pages 4 through 7 of the Prefiled Direct Testimony of Craid Tystad filed on February 21, 2001. These revised pages replace pages 4 through 8 of the original Prefiled Direct Testimony of Mr. Tystad. For your information, the revised testimony corrects Mr. Tystad's answer to the following question:

Q: What effect will Verizon's changes to its Routing Database System (RDBS) and Business Rating Information Database System (BRIDS) have on other telecommunications carriers in the Tampa Market Area? What effect would one or more rate centers have on telecommunications carriers in the Tampa Market Area?

There were no other changes in Mr. Tystad's testimony. If you have any questions with regard to the foregoing, please do not hesitate to contact me.

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.


Karen M. Camechis, Esq.

KMC/kms

DOCUMENT NUMBER-DATE

02783 MAR-15

FPSC-RECORDS/REPORTING

1 covering the area where the predominate number of our customers
2 physically reside. TWTC would then have to request initial codes in the
3 other four rate centers in order to bring customers into alignment with
4 Verizon's rate centers, and to allow customers to participate in porting. As a
5 result, customers may be forced to take a number change to a new area code.

6 This would be the case with each of the approximately 32 ALEC's in
7 the Tampa area. Each ALEC would be required to go to the NANPA and
8 request a new NXX for four additional rate centers. This instantly increases
9 the amount of assigned NXX's to 128, and could contribute to the premature
10 exhaust of the 813 NPA, in addition to causing customer dissatisfaction due
11 to required number changes.

12 **Q: What effect will Verizon's changes to its Routing Database System**
13 **(RDBS) and Business Rating Information Database System (BRIDS)**
14 **have on other telecommunications carriers in the Tampa Market Area?**
15 **What effect would one or more rate centers have on telecommunications**
16 **carriers in the Tampa Market Area?**

17 **A:** Terminating calling plans from outside the Tampa area may disadvantage
18 TWTC. For example, as the table below demonstrates, a terminating calling
19 plan from the New Port Richey rate center into the Tampa area must be
20 defined by Verizon for six (6) different rate centers, Tampa, Tampa Central,
21 Tampa South, Tampa North, Tampa East, and Tampa West. The Tampa rate
22 center may be designated as a toll call from New Port Richey, whereas all
23 other rate centers may be designated as a local call from New Port Richey.

1 TWTC would have no control over the determination of whether the call is
2 toll or local, thereby negatively impacting TWTC customers.

3 Calling Plan for New Port Richey:

Calls to	Worst Case	Best Case
Tampa	Toll	Local
Tampa Central	Toll	Toll
Tampa North	Local	Local
Tampa South	Toll	Toll
Tampa East	Toll	Toll
Tampa West	Local	Local

4

5 **Q: Should a number pooling trial be implemented in the Tampa**
6 **Metropolitan Statistical Area? If so, when should the number pooling**
7 **trial begin?**

8 A: Yes, and the trial should be begin July 1, 2001. Number pooling mandates
9 that there be a separate number pool established for each rate center. In the
10 Tampa area, there would be six separate number pools, one for each rate
11 center, i.e. Tampa (ALEC's), Tampa Central, Tampa North, Tampa South,
12 Tampa East, and Tampa West (Verizon). The problem this creates is that
13 the ALEC's, of which there are approximately 32, would donate and
14 participate in one number pool for the "Tampa" rate center. Verizon would
15 donate, to themselves, and be the only service provider to participate in the
16 other five rate center pools, since the ALEC's do not have numbers
17 designated for the five Verizon rate centers. This process defeats the
18 purpose of number pooling as an optimization method within the 813 NPA.

19 **Q: What other number conservation measures, if any, should the**
20 **Commission order in the Tampa Market Area? If other number**

1 **conservation measures should be implemented, when should these**
2 **measures be implemented? How should the cost recovery be**
3 **established?**

4 A: Rate center consolidation is a conservation measure that should be ordered
5 for the Tampa Market Area. Rate center consolidation should be
6 implemented immediately. Each carrier should absorb the costs of
7 implementing rate center consolidation.

8 **Q: Should Verizon be ordered to implement rate center consolidation in the**
9 **Tampa Market Area?**

10 A: Yes.

11 **Q: If Verizon should be ordered to implement rate center consolidation in**
12 **the Tampa Market Area, how many rate centers should be**
13 **consolidated? and if so, how should it be implemented?**

14 A: There should be one rate center for the Tampa area.

15 **Q: When should the rate center consolidation be effective?**

16 A: Rate center consolidation should be ordered immediately with completion as
17 soon as practicable.

18 **Q: Should Verizon be allowed to recover its costs upon consolidation of its**
19 **rate centers in the Tampa Market Area? If so, how?**

20 A: As stated above, all carriers, including Verizon, should absorb the costs of
21 implementing rate center consolidation in Tampa.

1 **Q: Should Verizon be required to undo changes made prior to August 15,**
2 **2000, in its RDBS and BRIDS systems? If so, should Verizon be**
3 **required to file a revised Tariff reflecting one Tampa Rate Center?**

4 **A:** Yes, and Verizon should be required to file a revised tariff reflecting one rate
5 center for the Tampa market area. Implementation of the proposed
6 modifications to the RDBS and the BRIDS could result in the premature
7 exhaustion of NPA 813. If the Commission does not take immediate action
8 to cease further updates to the RDBS and the BRIDS, all ALECs in the
9 Tampa area will be required to obtain NXX codes in all five Tampa rate
10 centers, effective May 1, 2001. Therefore, Verizon should be required to
11 “undo” changes made prior to August 15, 2000 in its RDBS and BRIDS
12 systems in order to effectuate rate center consolidation in the Tampa area.

13 **Q: Does this conclude your testimony?**

14 **A:** Yes.

CERTIFICATE OF SERVICE
DOCKET NO. 010102

I HEREBY CERTIFY that a true and correct copy of the foregoing **Revised Direct Testimony of Craig Tystad offered on behalf of Time Warner Telecom of Florida, L.P.** has been served by Hand-Delivery to Verizon Florida, Inc., Ms. Michelle A. Robinson, c/o Mr. David Christian, 106 East College Avenue, Suite 810, Tallahassee, Florida 32301-7704 and by U.S. Mail on this 1st day of March, 2001, to the following parties of record:

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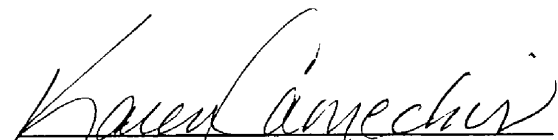
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