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March 5, 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 Rebuttal 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,


Floyd R. Self

FRS/amb
Enclosure

cc: Scott Sapperstein, Esq.
Parties of Record

DOCUMENT NUMBER-DATE
02906 MAR-5
FPSC-RECORDS/REPORTING

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) affecting the Tampa)
telecommunications carriers)
_____)

DOCKET NO. 010102-TP

REBUTTAL TESTIMONY OF KELLY FAUL

ON BEHALF OF

INTERMEDIA COMMUNICATIONS, INC.

March 5, 2001

1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME.**

3 A. My name is Kelly Faul.

4 **Q. ARE YOU THE SAME KELLY FAUL WHO FILED TESTIMONY IN**
5 **THIS CASE ON FEBRUARY 21, 2001?**

6 A. Yes.

7 **Q. WHAT IS THE PURPOSE OF YOUR PRESENT TESTIMONY?**

8 A. The purpose of my testimony is to provide comments on the impacts of rate
9 center boundary realignment described by Verizon in its testimony of
10 Beverly Y. Menard.

11 **Q. WHAT IS THE GIST OF MS. MENARD’S TESTIMONY?**

12 A. Ms. Menard provides testimony in support of Verizon’s change in the
13 Business Rating Information Database System (BRIDS) and the Routing
14 Database System (RDBS). She states that in essence this is how Verizon has
15 been operating for at least 30 years, although the exact time that these rate
16 centers were implemented is unknown. She contends that this five rate
17 centers structure – Tampa Central, Tampa East, Tampa West, Tampa North,
18 and Tampa South – is necessary to eliminate manual practices that have been
19 in place for years.

20

21 **TODAY’S RATE CENTER STRUCTURES**

22 **Q. WHAT RATE CENTER CONFIGURATION DOES INTERMEDIA**
23 **USE TODAY?**

1 A. Intermedia uses one rate center, the Tampa rate center.

2 **Q. HOW HAVE ALTERNATIVE LOCAL EXCHANGE CARRIERS**
3 **(ALECS) INCLUDING INTERMEDIA BEEN USING NXXS?**

4 A. The ALECs (including Intermedia) since their inception, have been receiving
5 codes in the industry recognized Tampa rate center and assigning and porting
6 numbers within the geographic boundaries defined for the Tampa rate center.
7 This rate center has defined boundaries which carriers use to assign
8 telephone numbers to its customers within that geographic boundary. Even
9 though the Verizon code administrator -- who was the code administrator
10 until June 1998 -- may have made the assumption that the ALECs' NXXs
11 were to be assigned to the Tampa Central rate center, ALECs used the Tampa
12 rate center designation to assign numbers throughout the entire area cover by
13 the Tampa rate center. The Tampa rate center was the industry recognized
14 rate centers in the Local Exchange Routing Guide (LERG), BRIDS, and
15 RIDB; and continues to be for most ALECs.

16 **Q. DO YOU AGREE WITH MS. MENARD'S STATEMENT ON PAGE**
17 **7, LINES 9 THROUGH 12 THAT THE FIVE RATE CENTERS ARE**
18 **REQUIRED SO THAT VERIZON CAN CORRECTLY RATE ITS**
19 **END USERS' CALLS?**

20 A. Ms. Menard contends that Verizon cannot properly rate calls from its end
21 users unless the ALECs use the five rate centers designation. Verizon today
22 is billing its customers' calls to ALEC customers based on the ALECs' one
23 rate center environment. Unless Verizon has been billing its customers

1 incorrectly during the past number of years, this statement cannot be true.

2 While Verizon contends that five rate centers have existed for over
3 30 years, it must be noted that for the ALECs one Tampa rate center has
4 always existed.

5 **Q. CURRENTLY, ONE OF VERIZON’S RECOMMENDATIONS IS**
6 **THAT THE 813-NXXS WHICH ARE ALREADY ASSIGNED TO**
7 **ALECS AND THEIR CUSTOMERS THROUGHOUT THE TAMPA**
8 **RATE CENTER BE GRANDFATHERED. GIVEN THIS FACT, WILL**
9 **THE PROBLEMS IDENTIFIED BY VERIZON WITH RATING AND**
10 **ROUTING CONTINUE TO EXIST?**

11 **A.** Yes, for those grandfathered 813-NXXs, the rating and routing problems
12 identified by Verizon will continue. Verizon states in its testimony that
13 Verizon cannot properly rate calls from its end users unless the ALECs use
14 the five rate centers designations. Verizon today is billing its customers for
15 calls to ALEC customers in an ALEC one rate center environment today.
16 This will continue for those grandfathered customers. Additionally, this
17 could have a severe impacts on local number portability (LNP).

18 **Q. CAN YOU EXPLAIN WHAT IMPACTS THIS WILL HAVE ON**
19 **LOCAL NUMBER PORTABILITY (LNP)?**

20 **A.** Customers are allowed to port their numbers within a rate center. For
21 example, take a customer who has numbers assigned by an ALEC in the
22 Tampa rate center and is physically located in, let’s say, what would now
23 become Tampa East. If that customer wishes to port to Verizon, its numbers

1 would not be physically located in the Tampa East rate center, if it is
2 assumed that all currently assigned NXXs are assigned to the Tampa Central
3 rate center (as is assumed in Ms. Menard's testimony on Page 10, line 12
4 through 13). The result is that this customer would require a new telephone
5 number if it wanted to port to Verizon or any other carrier using the five rate
6 center structure.

7

8 **CONCLUSION**

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

10 A. Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of The Rebuttal 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 5th day of March, 2001.

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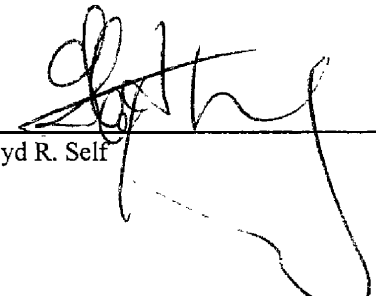
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