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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 WorldCom, Inc. are an original and fifteen copies of the Rebuttal Testimony of James D. Joerger on behalf of WorldCom, 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: Donna Canzano McNulty, Esq.
Parties of Record

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

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

REBUTTAL TESTIMONY OF JAMES D. JOERGER

ON BEHALF OF

WORLDCOM, INC.

March 5, 2001

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

2 A. My name is James D. Joerger. My business address is 2250 Lakeside Drive,
3 Dallas, Texas 75082.

4 **Q. ARE YOU THE SAME JAMES JOERGER WHO FILED DIRECT**
5 **TESTIMONY IN THIS CASE?**

6 A. Yes, I am.

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

8 A. My rebuttal testimony responds to the testimony of the Verizon Florida, Inc.
9 (“Verizon”) witness, Ms. Beverly Menard.

10 **Q. WHAT IS YOUR FIRST ISSUE WITH RESPECT TO MS.**
11 **MENARD’S DIRECT TESTIMONY?**

12 A. My first problem with her testimony is the assumption that the five rate
13 centers proposed by Verizon, and put into effect on February 1, 2001, are
14 somehow the correct structure for Tampa because the Verizon tariff identifies
15 five rate centers. What Verizon does or has done for its own internal
16 functionality or operations is not the issue. Rather, from the beginning of
17 local competition, the Local Exchange Routing Guide (LERG) has defined
18 the rate areas that describe the Tampa metropolitan area. The LERG has
19 always defined but a single Tampa rate center, identified simply as Tampa.

20 **Q. BUT WHAT ABOUT HER STATEMENTS THAT THE ALEC NXX**
21 **CODES HAVE REALLY BEEN ASSIGNED TO THE TAMPA**
22 **CENTRAL RATE CENTER?**

23 A. Again, what Verizon has done to route or handle calls is not the issue. All of
24 the ALECs have entered the market, made their marketing plans, and
25 configured their networks on the basis of a single Tampa rate center. Even

1 Mr. Foley, testifying on behalf of NeuStar in this case, makes it clear that
2 there is, or at least was, prior to February 1, 2001, only one Tampa rate
3 center. The fact that we have a neutral, independent code administrator that
4 is the current keeper of the LERG which reflects but the single Tampa rate
5 center should only confirm this basic network fact.

6 **Q. DO YOU AGREE WITH MS. MENARD'S RECOMMENDATION AT**
7 **PAGE 10 OF HER TESTIMONY TO GRANDFATHER THE**
8 **EXISTING ALEC NXX CODES?**

9 A. No. As I and the other ALEC witnesses discussed in our direct testimonies,
10 this creates potential numbering porting and pooling issues. More
11 importantly, it will require that for new customers additional NXX codes be
12 obtained. As Mr. Foley has testified, there is a very real potential of the
13 premature exhaust of the 813 NPA.

14 **Q. DO YOU AGREE WITH MS. MENARD'S TESTIMONY**
15 **REGARDING THE POTENTIAL ISSUES FALLING OUT OF RATE**
16 **CENTER CONSOLIDATION FOR THE TAMPA AREA?**

17 A. I am not an attorney, so I am not qualified to address the legal issues raised
18 by her testimony. However, if you accept her basic premise, it may follow
19 that the legal or financial problems she has identified may result. But as I
20 have testified, she starts from the wrong position. The reality is not five rate
21 centers, but the one Tampa rate center that has existed in the LERG and
22 which all the ALECs and the rest of the world have always responded to
23 when routing calls. What we are seeking is simply a return to what has
24 always existed.

25 **Q. WHAT ABOUT THE OTHER OPERATIONAL ISSUES MS.**

1 **MENARD HAS DESCRIBED BEGINNING AT PAGE 16 OF HER**
2 **TESTIMONY IN CONNECTION WITH “CONSOLIDATING”**
3 **TAMPA RATE CENTERS?**

4 A. I do not have access to all of the underlying operational matters she has
5 identified. However, as her testimony makes clear, and the entire conduct of
6 this entire issue also demonstrates, additional investigation and fact gathering
7 is required. Verizon should more fully explore these issues and report to the
8 Commission the specifics of each of the problems she has identified and the
9 various alternatives and time frames affecting such problems. In the final
10 analysis, I do not believe that this information would change the LERG
11 reality of one Tampa rate center, but it may help Verizon transition its
12 internal systems to that reality.

13 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

14 A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of The Rebuttal Testimony of James D. Joerger on behalf of WorldCom, 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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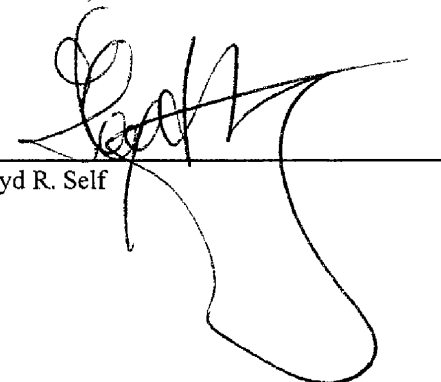
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