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ORIGINAL

March 5, 2001

Ms. Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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Re: Docket No. 010102-TP  
Investigation of Proposed Updates to the Routing Data Base System (RDBS)  
and Business Rating Input Database System (BRIDS) Affecting the Tampa  
Telecommunications Carriers

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of the Rebuttal Testimony of  
Beverly Y. Menard on behalf of Verizon Florida Inc. in the above matter. Service has  
been made as indicated on the Certificate of Service. If there are any questions  
regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

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Enclosures

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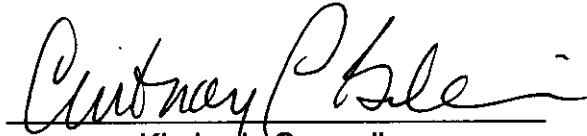
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the Rebuttal Testimony of Beverly Y. Menard on behalf of Verizon Florida Inc. in Docket No. 010102-TP were sent via U.S. mail on March 5, 2001 to the parties on the attached list.

  
\_\_\_\_\_  
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**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) ) Docket 010102-TP  
affecting the Tampa telecommunications )  
carriers )

**REBUTTAL TESTIMONY**

**OF**

**BEVERLY Y. MENARD**

**ON BEHALF**

**OF**

**VERIZON FLORIDA INC.**

March 5, 2001

DOCUMENT NUMBER-DATE

**02973 MAR-7**

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**REBUTTAL TESTIMONY OF BEVERLY Y. MENARD**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH VERIZON.**

A. My name is Beverly Y. Menard. My business address is One Tampa City Center, Tampa, Florida 33601-0110. My current position is Assistant Vice President - Advocacy Support and I am employed by Verizon Communications.

**Q. ARE YOU THE SAME BEVERLY MENARD WHO SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING?**

A. Yes.

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

A. The purpose of my testimony is to rebut positions taken by other parties on the recognition of Verizon's existing five Tampa rate centers.

**Q. WHAT IS YOUR MAIN CONCERN WITH OTHER PARTIES' TESTIMONY?**

A. The alternative local exchange carriers (ALECs) complain that Verizon is splitting the Tampa rate area currently shown in the local exchange routing guide (LERG) into five new rate centers. These five rate centers, however, have existed for over 30 years; Verizon has been assigning ALEC codes to one of the five Tampa rate centers for

1 rating purposes when any new NXX codes are established since the  
2 establishment of the first ALEC code. The ALECs' misperception  
3 appears to have arisen because, unfortunately, Verizon did not  
4 correctly populate the LERG with the proper Tampa rate center  
5 shown as the rate center prior to Verizon's transfer of the code  
6 administration function to Lockheed Martin (now Neustar) in 1998.

7

8 **Q. WERE VERIZON'S NXX'S SHOWN WITH THE PROPER RATE**  
9 **CENTER DESIGNATION PRIOR TO FEBRUARY 1, 2001?**

10 A. Yes. However, the designation was not shown in the rate center  
11 column, but rather in the location column. The designations which  
12 were shown for all Verizon (then, GTE Florida) NXX's were TMPA  
13 LCA C, TMPA LCA E, TMPA LCA W, TMPA LCA N or TMPA LCA S.  
14 The ending letter on the location field showed the proper rate center  
15 as Central, East, West, North or South.

16

17 **Q. DID ANY ALECS SHOW THE PROPER TAMPA RATE CENTER**  
18 **PRIOR TO FEBRUARY 1, 2001?**

19 A. Yes. For instance, the LERG shows NXX 482 for Winstar Wireless  
20 as TMPA LCA N and NXX 489 as TMPA LCA S. US LEC's NXXs  
21 also show the Tampa rate centers.

22

23 **Q. DID ALL ALECS SHOW THE PROPER TAMPA RATE CENTER**  
24 **PRIOR TO FEBRUARY 1, 2001?**

25 A. No. As explained in my direct testimony, this was the reason that the

1 industry forum called CIGRR (Common Interest Group on Routing  
2 and Rating) recommended the changes to the LERG to make them  
3 consistent with Verizon's tariffs and to insure that all ALECs were  
4 assigned NXX codes consistent with the existing Tampa rate centers.  
5 For ALECs which showed Tampa in the location column, the NXXs  
6 were assumed to be TPA LCA C. The analysis contained in Exhibit  
7 No. BYM-4 shows that this was an accurate assumption.

8

9 **Q. MR. JOERGER (AT PAGE 4 OF HIS DIRECT TESTIMONY (DT))**  
10 **STATES THAT NEW ENTRANTS WERE ASSIGNED CODES TO**  
11 **THE UNIVERSAL TAMPA RATE CENTER. DOES VERIZON**  
12 **AGREE WITH THIS ASSESSMENT?**

13 A. No. I understand that some ALECs believe that is the case.  
14 However, as discussed in greater detail in my direct testimony, when  
15 Verizon was responsible for CO code assignments, the issue of the  
16 Tampa rate centers was discussed when new NXXs were ordered  
17 and the codes were actually established as Tampa Central rate center  
18 codes even though the LERG did not correctly reflect that  
19 designation. Verizon's billing system cannot recognize a universal  
20 Tampa rate center. A single rate center covering the entire Tampa  
21 metropolitan area does not exist.

22

23 **Q. MR. FOLEY PRESENTS AN ANALYSIS OF THE POTENTIAL**  
24 **IMPACT TO NUMBERING RESOURCES IN THE 813 AREA CODE**  
25 **IF ALL ALECS REQUEST ADDITIONAL CODES. IS THERE**

1           **ANYTHING THAT CAN BE DONE TO REDUCE THIS IMPACT?**

2           A.    As discussed in Mr. Tystad's testimony, a number pooling trial should  
3           be implemented in the Tampa MSA. Verizon has supported this  
4           proposal. As shown in Exhibit BYM-4 and this Commission's Cost  
5           Statistics reports, most customers are located in Tampa Central. Mr.  
6           Foley's estimate of 91 central office (CO) codes would be reduced to  
7           approximately 9 CO codes if each ALEC only required one thousand  
8           numbers in each of the other four Tampa rate centers. This number  
9           of CO codes would be able to be further reduced since there should  
10          be thousand number blocks in existing Tampa central NXXs which  
11          could be returned for reassignment. In addition, it is unknown  
12          whether there are any existing NXX codes which should be reclaimed  
13          under the existing numbering guidelines.

14  
15          **Q.    MS. HENDERSON (DT AT 7) STATES THAT POOLING IN TAMPA**  
16          **WOULD LIKELY HAVE A VERY MINIMAL IMPACT ON DELAYING**  
17          **EXHAUST IN THE 813 NPA IF ADDITIONAL NXX CODES ARE**  
18          **REQUIRED. DO YOU AGREE WITH THIS POSITION?**

19          A.    No. Based on the analysis shown in Exhibit BYM-4, the ALECs have  
20          been concentrating on Tampa Central customers. Therefore, it is  
21          extremely unlikely that any ALEC has an immediate need for more  
22          than a single thousand number pooling block in any other Tampa rate  
23          center.

24  
25          **Q.    MS. FAUL (DT AT 4), MR. JOERGER (DT AT 9), MS. HENDERSON**



1 (DT AT 6), MR. FOLEY (DT AT 6), AND MR. TYSTAD (DT AT 3) ALL  
2 DISCUSS FORCING ALEC CUSTOMERS TO TAKE A NUMBER  
3 CHANGE. WHAT IS VERIZON'S POSITION ON THIS ISSUE?

4 A. As discussed in my direct testimony, Verizon's position is that existing  
5 customers who are not physically located in the Tampa Central rate  
6 center but whose NXX code gets assigned to Tampa Central should  
7 not have to take a number change at this time. The requirement for  
8 a customer to change their phone number if they wish to be served by  
9 Verizon, but are physically located in another Tampa rate center, has  
10 existed since September, 1998.

11

12

13 Q. MR. TYSTAD (DT AT 7) PROPOSES THAT RATE CENTER  
14 CONSOLIDATION SHOULD BE ORDERED IMMEDIATELY AND  
15 ALL CARRIERS, INCLUDING VERIZON, SHOULD ABSORB THE  
16 COSTS OF IMPLEMENTING RATE CENTER CONSOLIDATION IN  
17 TAMPA. DO YOU HAVE ANY CONCERNS WITH THIS  
18 PROPOSAL?

19 A. Yes, I have major concerns. As addressed in my direct testimony,  
20 there is considerable doubt as to whether the Commission even has  
21 the legal authority to order rate center consolidation. In any event,  
22 rate center consolidation would have a major revenue impact on  
23 Verizon. It would take twelve to eighteen months to implement a  
24 change of this magnitude. Exhibit BYM-6 shows the changes which  
25 would need to be made in Verizon customers' calling scopes if the

1 existing Tampa rate centers were consolidated to one Tampa rate  
2 center.

3

4 **Q. MR. TYSTAD (DT AT 4) DISCUSSES SIX DIFFERENT RATE**  
5 **CENTERS FOR VERIZON. DOES VERIZON HAVE SIX RATE**  
6 **CENTERS FOR TAMPA?**

7 A. No. There are only five rate centers in Tampa. None of Verizon's  
8 systems have the capability to recognize all five Tampa rate centers  
9 as one rate center.

10

11 **Q. MR. TYSTAD (DT AT 6), MR. JOERGER (DT AT 11), AND MS.**  
12 **HENDERSON (DT AT 7) DISCUSS SIX SEPARATE NUMBER**  
13 **POOLS AND THE PROBLEMS THIS WOULD CREATE. DOES**  
14 **VERIZON SUPPORT SIX NUMBERING POOLS?**

15 A. No. Since some ALECs have designated their NXX codes to the  
16 proper Tampa rate centers, there would be other carriers in the same  
17 pools as Verizon. In addition, if all ALECs use the existing Tampa  
18 rate centers, there would be only five pools, with all ALECs having  
19 customers in the same rate center participating in the same pools.

20

21 **Q. IF VERIZON'S AUGUST 15, 2000 PROPOSAL WERE**  
22 **IMPLEMENTED FOR ALL ALECS AND POOLING WAS**  
23 **IMPLEMENTED IN THE 813 NPA, HOW MANY POOLS WOULD**  
24 **EXIST?**

25 A. There would be seven pools. The pooling areas would be Tampa

1 Central, Tampa North, Tampa South, Tampa East, Tampa West,  
2 Plant City and Zephyrhills.

3

4 **Q. MR. TYSTAD (DT AT 8) DISCUSSES THE REQUIREMENT FOR**  
5 **ALL ALECS TO OBTAIN CODES IN ALL FIVE TAMPA RATE**  
6 **CENTERS EFFECTIVE MAY 1, 2001. IS THERE ANY SUCH**  
7 **REQUIREMENT AT THIS TIME?**

8 A. No. The ALECs had originally requested a delay until May 1, 2001  
9 to show their NXX codes with the proper Tampa rate center  
10 designation. As a result of Order number PSC-01-0456-PAA-TP,  
11 there is no date set for this change. Verizon supports implementation  
12 of the change in the proper sequence with thousands block number  
13 pooling so all carriers will be able to participate in the five number  
14 pools and will not require excessive numbering resources.

15

16 **Q. MS. FAUL (DT AT 6) AND MS. HENDERSON (DT AT 6) DISCUSS**  
17 **A SCENARIO WHERE VERIZON USES FIVE RATE CENTERS AND**  
18 **OTHER CARRIERS USE ONE RATE CENTER. DOES VERIZON**  
19 **HAVE ANY CONCERNS WITH THIS PROPOSAL?**

20 A. Yes. This will be anticompetitive for Verizon as customers would be  
21 able to port between ALECs and would not be able to port to Verizon  
22 without taking a number change. This situation has existed for some  
23 customers since September 1998. In addition, Verizon has no way  
24 of recognizing only one rate center for the ALECs. There would be no  
25 way that Verizon could insure that all customers are treated in a

1 nondiscriminatory manner under the ALECs' proposal, as the calling  
2 scopes vary for every Tampa rate center. For Verizon's billing  
3 system, each NXX can only be associated with a single Tampa rate  
4 center.

5

6 **Q. MR. JOERGER (DT AT 10) SUGGESTS THAT THE INDUSTRY**  
7 **SHOULD RETURN TO THE STATUS QUO THAT EXISTED PRIOR**  
8 **TO FEBRUARY 1, 2001 AND HAVE ONLY ONE TAMPA RATE**  
9 **CENTER. IS THAT APPROPRIATE?**

10 A. No. Verizon has five existing Tampa rate centers and changing the  
11 designation in the LERG back to Tampa does not change the five  
12 different local calling scopes that actually exist for the different rate  
13 centers in Tampa. These rate centers are no different than the rate  
14 centers that exist for other rate centers. Changing the LERG  
15 designation will not change the requirement for Verizon to assign  
16 each NXX to only one of the five Tampa rate centers. The confusion  
17 that exists today might never have occurred if the five Tampa rate  
18 centers had different names—for example, Tampa, Brandon, Ruskin,  
19 Oldsmar and Lutz.

20

21 **Q. MR. JOERGER (DT AT 12) SUGGESTS THAT A NUMBER**  
22 **POOLING TRIAL SHOULD BEGIN AFTER VERIZON REVERSES**  
23 **THE CHANGES TO THE LERG AND RETURNS TO A SINGLE**  
24 **TAMPA RATE CENTER. CAN VERIZON PARTICIPATE IN ONE**  
25 **POOL FOR TAMPA?**

1 A. No. Even if the LERG showed Tampa as the rate center, Verizon has  
2 five existing Tampa rate centers. Verizon cannot port customers  
3 between these rate centers. Verizon cannot participate in one pool  
4 for Tampa.

5

6 **Q. MR. JOERGER (DT AT 10) DISCUSSES THE MANUAL PROCESS**  
7 **THAT ALECS HAVE ESTABLISHED FOR NUMBER PORTABILITY**  
8 **PURPOSES. DID VERIZON CONSIDER THIS FACTOR WHEN IT**  
9 **MADE THE LERG CHANGES?**

10 A. No. Since the subject of the five Tampa rate centers was discussed  
11 in numerous industry meetings when number portability was  
12 implemented and the location designations have been shown in the  
13 LERG, Verizon believed that ALECs were cognizant of the five Tampa  
14 rate centers for number portability purposes. However, it appears that  
15 this is not necessarily the case. Verizon believes that the proper  
16 recognition of the existing Tampa rate centers is required so all  
17 carriers can follow the LNP requirements.

18

19 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

20 A. Yes. Throughout this process, there has been a misconception  
21 relative to the Tampa rate center. Verizon is not converting,  
22 expanding, or changing the currently tariffed Tampa rate centers. It is  
23 only correcting the RDBS system and its output products to match  
24 what is currently reflected in the tariff and its switches. All ALECs'  
25 codes should be assigned to the proper Tampa rate center (based on

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where the majority of the customers are physically located) and  
thousand block number pooling should be implemented.

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

A. Yes, it does.

| <b>Rate Center</b> | <b>Toll Routes<br/>Converts to EAS</b> | <b>Toll Routes<br/>Converts To ECS</b>                        | <b>ECS Routes<br/>Converts to EAS</b> |
|--------------------|--|---|---------------------------------------|
| Tampa Central      | Palmetto                               | New Port Richey   | Clearwater<br>Zephyrhills             |
| Tampa East         | Palmetto                               | Dade City (Sprint)<br>San Antonio (Sprint)<br>New Port Richey | Clearwater<br>Zephyrhills             |
| Tampa North        | Palmetto                               |   | Clearwater                            |
| Tampa South        |  | Dade City (Sprint)<br>San Antonio (Sprint)<br>New Port Richey | Clearwater<br>Zephyrhills             |
| Tampa West         | Palmetto                               | Dade City (Sprint)<br>San Antonio (Sprint)                    | Zephyrhills                           |