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June 18, 2001

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

Re: Docket No. 000604-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Rebuttal Testimony of R. Earl Poucher on behalf of the Citizens of the State of Florida. A diskette in Wordperfect format is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck  
Deputy Public Counsel

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Leg-1

Sec-1

CJB:bsr

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RJM

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DOCUMENT NUMBER-DATE

07560 JUN 18 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of )  
proposed numbering plan )  
relief for the 941 area code )

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Docket No. 000604-TL

Filed: June 18, 2001

REBUTTAL TESTIMONY

OF

R. EARL POUCHER

On Behalf of the Citizens of the State of Florida

Jack Shreve  
Public Counsel

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Attorney for the Citizens  
of the State of Florida

DOCUMENT NUMBER-DATE

07560 JUN 18 2001

FRSC-RECORDS/REPORTING

**REBUTTAL TESTIMONY**  
**R. EARL POUCHER**  
**FOR**  
**THE OFFICE OF PUBLIC COUNSEL**  
**BEFORE THE**  
**FLORIDA PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 000604-TL**

1       **Q.    Please state your business experience.**

2       A.    I graduated from the University of Florida in 1956. I began my  
3            telephone career in July 1956 as a Service Representative working  
4            in the Southern Bell Jacksonville Business Office. I retired in 1987  
5            with 29 years of service. During my career with Southern Bell, I held  
6            positions as Forecaster, Gainesville; Business Office Manager,  
7            Melbourne and Orlando; District Manager--Business Office, Atlanta;  
8            General Commercial-Marketing Supervisor, Georgia; Supervisor-  
9            Rates and Tariffs, Florida; District Manager-Rates and Tariffs,  
10          Georgia; General Rate Administrator, Headquarters; Division Staff  
11          Manager--Business Services, Georgia; Profitability Manager-  
12          Southeast Region, Business Services; Distribution Manager-  
13          Installation, Construction & Maintenance, West Florida and LATA  
14          Planning Manager-Florida. In addition, I was assigned to AT&T in  
15          1968 where I worked for three years as Marketing Manager in the  
16          Market and Service Plans organization. I joined the Office of Public  
17          Counsel in October 1991 where I have performed analytical work and  
18          presented testimony primarily in telephone matters. I am also  
19          serving as a staff member on the Federal-State Board on Universal

1 Service assisting the NASUCA consumer advocate, Martha Hogerty.

2 **Q. Have you ever appeared before this Commission?**

3 A. Yes I have. I testified on behalf of Public Counsel in United  
4 Telephone's Docket No. 910980-TL on rate case matters and Docket  
5 No. 910725-TL on depreciation matters, GTE Docket 920188-TL on  
6 Inside Wire, and in Southern Bell's depreciation Docket No. 920385-  
7 TL. I filed testimony in Southern Bell's Dockets 920260-TL, 900960-  
8 TL and 910163-TL, in the GTE Docket No. 950699-TL, in Docket  
9 No. 951123-TP dealing with Disconnect Authority, in Docket No.  
10 9708820-TI dealing with slamming and in Docket No. 970109-TL  
11 dealing with "I Don't Care, It Doesn't Matter". I have filed testimony  
12 in connection with Docket No. 991376-TL dealing with Verizon quality  
13 of service, in Docket No. 991378-TL dealing with BellSouth quality of  
14 service and in Docket No. 990362-TL dealing with Verizon slamming.  
15 In addition, as an employee of Southern Bell I testified in rate case  
16 and anti-trust dockets before the Public Service Commissions in  
17 Georgia and North Carolina.

18 **Q. What is the purpose of your testimony?**

19 A. The purpose of my testimony is to present to the Commission the  
20 recommendations of the Office of Public Counsel regarding the  
21 appropriate measures that the citizens are requesting the  
22 Commission to take in providing relief for the exhaust of numbering  
23 resources within the 941 area code, should relief be required.

24 **Q. What is the basis for the recommendations you are making?**

25 A. The Commission held six public hearings throughout the 941 Area

1 Code in May of this year to solicit public input regarding the proposals  
2 that have been forwarded by the industry in providing relief to the 941  
3 area code. The public response to these hearings was significant,  
4 providing Public Counsel and this Commission with a clear  
5 understanding regarding citizen preferences for the alternatives  
6 available to the Commission in resolving the issues in this Docket.  
7 The citizen preferences are at odds with the recommendations of the  
8 industry in this Docket, and Public Counsel is asking the Commission  
9 to reject the recommendations of the industry and comply with the  
10 wishes of the citizens.

11 **Q. What is the recommendation of the industry in this docket?**

12 A. The industry has recommended that the Commission adopt Option 1  
13 for relief of the 941 area code, which would involve a new area code  
14 overlay over the existing 941 area, thus requiring 10 digit dialing for  
15 all future local calls within the area as well as different area codes for  
16 telephones located within the same geographical area. The industry  
17 position also supports a geographical spit that is identified as Option  
18 4, should the Commission determine that an overlay is not  
19 appropriate for 941.

20 **Q. What is the recommendation of Public Counsel?**

21 A. Based on the overwhelming public response received in the six public  
22 hearings, the Commission should order the following steps to be  
23 taken with regard to the 941 area code:

24 1. The Commission should reject the industry proposal to create an  
25 overlay area code and impose 10-digit local dialing for the entire 941

- 1 area.
- 2 2. The Commission should select the proposed Option 4 that splits
- 3 the 941 at the Charlotte/Lee County boundary and include Boca
- 4 Grande in the northern area code, along with Manatee, Sarasota and
- 5 Charlotte counties.
- 6 3. The Commission should delay the actual date of the geographic
- 7 split as long as possible and pursue number conservation measures
- 8 that could extend the life of the existing 941 area code. Pursuit of
- 9 number conservation measures in the 941 area has the potential to
- 10 significantly extend the proposed life of the two area codes after the
- 11 split occurs.
- 12 4. The Commission should seek authority from the FCC to
- 13 investigate the feasibility of a unique area code or area codes for
- 14 wireless services in Florida.

15 **Q. What is the basis of the recommendations made by Public**

16 **Counsel?**

17 A. The Commission heard significant testimony supporting a geographic

18 split during the six hearings, with only minor support for an overlay

19 area code. The testimony was passionate regarding the citizen's

20 opposition to 10-digit dialing and the concept of customers having to

21 deal with two area codes within the same dialing area, between

22 neighbors, and even within the same household. Testimony was

23 received from numerous citizens, elected officials and business

24 leaders from all of the counties and the overwhelming rejection of the

25 overlay concept and 10-digit dialing leads Public Counsel to the belief

1 that the Commission should make the continuation of 7-digit local  
2 dialing a top priority in its agenda as it considers appropriate area  
3 code relief. Even when given the option of losing their existing area  
4 code or moving to 10-digit dialing, the customer testimony received  
5 by the Commission indicated that consumers would rather change  
6 their area code than move to 10-digit dialing. It is the conclusion of  
7 Public Counsel that consumers place a high priority on being able to  
8 identify a geographical area associated with their assigned area code  
9 and that overlays associated with 10-digit dialing are confusing and  
10 burdensome. It is significant that the concept of a geographic split  
11 was endorsed throughout the 941 area code by the business and  
12 governmental leaders in the area, despite the fact that much of the  
13 cost of changing area codes is born by the business and  
14 governmental segment of the customer body.

15 **Q. Does that complete your testimony?**

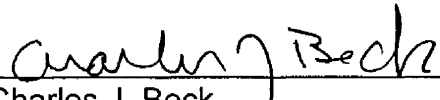
16 **A. Yes, it does.**

DOCKET NO. 000604-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 18th day June, 2001.

  
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