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11/1/96  
7

November 1, 1996

**BY HAND DELIVERY**

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

Re: Petition for numbering plan area relief for 904  
area code, by BellSouth Telecommunications, Inc.;  
Docket No. 961153-TL

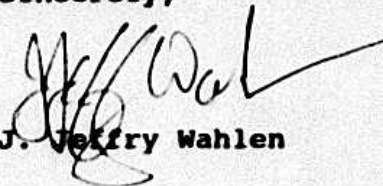
Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Direct Testimony of Harriet E. Eudy in the above-referenced docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

  
J. Jeffrey Wahlen

JJW/bjm

Enclosures

cc: All Parties of Record (w/encls.)

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1                                   **BEFORE THE PUBLIC SERVICE COMMISSION**

2                                   **DIRECT TESTIMONY**

3                                   **OF**

4                                   **HARRIET E. EUDY**

5   **Q.**   Please state your name and business address.

6  
7   **A.**   My name is Harriet E. Eudy. My business address is 206  
8           White Avenue, Live Oak, Florida 32060.

9  
10 **Q.**   By whom and in what capacity are you employed?

11  
12 **A.**   I am employed by ALLTEL Florida, Inc. ("ALLTEL" or the  
13           "Company") as Manager, Regulatory Matters.

14  
15 **Q.**   Please describe your educational background.

16  
17 **A.**   I was graduated from North Florida Junior College in 1966  
18           with an Associate in Arts degree. I began working for  
19           North Florida Telephone Company (now ALLTEL Florida) in the  
20           accounting and cost separations areas. I became a  
21           supervisor in the regulatory department in 1987, and I have  
22           held my current position in that department since 1991.

23  
24 **Q.**   What is the purpose of your testimony?

25



1   **A.**   The purpose of my testimony is to present evidence in  
2           support of Option 1 as the appropriate method of providing  
3           area code relief in the 904 numbering plan area.  
4  
5   **Q.**   To what degree will your Company be impacted by a decision  
6           in this docket?  
7  
8   **A.**   In Florida, ALLTEL serves more than 74,000 access lines in  
9           27 exchanges. More than 62,000 of those access lines, or  
10          21 exchanges, are located in the Jacksonville LATA. If the  
11          relief plan that is ultimately adopted results in number  
12          changes for existing 904 customers in the Jacksonville  
13          LATA, we will be impacted significantly. Switch  
14          programming would be required to change all existing  
15          customers' numbers and to program our switches to recognize  
16          this code in routing future traffic. Operational Support  
17          Systems ("OSS"), including billing, customer service,  
18          repair reporting and testing, would need to be updated.  
19          Additional administrative expense will be incurred to  
20          provide customer notification of the changes and respond to  
21          customer inquiries and/or complaints. Also, like other  
22          businesses that experience number changes, our Florida  
23          operation will be required to change all of its stationery,  
24          business forms, etc. to reflect the new area code, since  
25          these offices are also located in the Jacksonville LATA.

1 Q. To what degree will ALLTEL's customers be impacted by a  
2 decision in this docket?  
3  
4 A. ALLTEL's customers will be significantly impacted by a  
5 decision in this docket if the plan that is ultimately  
6 adopted results in a change in the area code for the  
7 Jacksonville LATA. Business customers will be required to  
8 change their business forms, stationery, and other places  
9 their number is published to reflect the new area code.  
10 Customers in several of our exchanges, which are contiguous  
11 to the Gainesville LATA, have recently felt the impact of  
12 another area code change when the Gainesville LATA received  
13 a new code. ALLTEL received a number of calls from  
14 customers who are located close to the Gainesville area and  
15 were confused by the change. Another split would be  
16 something of a "double whammy" for these customers.  
17  
18 Q. What are the industry objectives in providing for NPA  
19 relief?  
20  
21 A. The industry objectives are to (1) provide the longest  
22 relief period, (2) minimize the number of customers who  
23 require changes, and (3) to minimize technical and  
24 operational impacts.  
25



1 Q. Have you reviewed the various options under consideration  
2 in this docket for area code relief?  
3  
4 A. Yes, I have.  
5  
6 Q. Which of the options do you believe best meets the industry  
7 objectives?  
8  
9 A. Option 1 best meets the industry objectives.  
10  
11 Q. Please describe Option 1.  
12  
13 A. Under Option 1, the Pensacola, Panama City, and Tallahassee  
14 LATAs would receive a new area code. Jacksonville and  
15 Daytona LATAs would retain the 904 area code.  
16  
17 Q. Why does Option 1 best meet the industry objectives?  
18  
19 A. Option 1 provides the greatest relief for the most amount  
20 of time for both the new NPA and the old (904) NPAs as  
21 determined by BellSouth, the code administrator for the 904  
22 NPA, and as noted in their petition to the Commission, item  
23 82, filed September 9, 1996. The 904 NPA for the  
24 Jacksonville and Daytona LATAs would be expected to exhaust  
25 in September 2002. The new NPA for the Pensacola, Panama

1 City, and Tallahassee LATAs would be expected to exhaust in  
2 November 2006.  
3  
4 Q. If the Commission does not adopt Option 1 as the  
5 appropriate solution, what other option do you feel best  
6 meets the industry objectives?  
7  
8 A. Option 2 seems to meet the objectives as a second choice  
9 because it impacts fewer subscribers and NXXs than Options  
10 1 and 1a; however, this approach provides a shorter relief  
11 interval than those options. Under Option 2, the 904 NPA  
12 would be expected to exhaust in October 2000.  
13  
14 Q. Please describe Option 2.  
15  
16 A. Under Option 2, the Pensacola and Panama City LATAs would  
17 receive a new area code. The Tallahassee, Jacksonville,  
18 and Daytona LATAs would retain the 904 NPA.  
19  
20 Q. Why is Option 1a inappropriate?  
21  
22 A. Option 1a would impact a greater number of subscribers and  
23 NXXs than Option 1; however, the exhaust dates to the  
24 respective LATAs would remain the same.  
25



1 Q. Please summarize your testimony.

2

3 A. ALLTEL believes that Option 1 should be adopted for area  
4 code relief for the 904 NPA. Option 1 best meets the  
5 industry objectives to provide the longest term relief,  
6 while minimizing the number of customers that will be  
7 impacted by the change.

8

9 Q. Does that conclude your testimony?

10

11 A. Yes, it does.