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November 1, 1996

**Ms. Blanco Bayo
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 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 is the original and 15 copies of the Direct
Testimony of Thomas M. McCabe on behalf of Quincy Telephone
Company in the above docket. Copies have been sent to parties of
record.**

Sincerely,



David B. Erwin

**DBE:akh
Enclosures
cc: Tom McCabe
Parties of Record**

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
PREPARED DIRECT TESTIMONY
OF
THOMAS M. McCABE

1 Q. Please state your name and business address.

2 A. My name is Thomas McCabe. My business address is P. O.
3 Box 189, Quincy, Florida 32353-0189.

4 Q. By whom and in what capacity are you employed?

5 A. I am employed by TDS Telecom, the parent company of
6 Quincy Telephone Company as Manager, External
7 Relations.

8 Q. Please describe your background and experience.

9 A. I am a graduate of the University of North Carolina at
10 Charlotte with a B.A. in Economics. I have been
11 employed at TDS Telecom since December 1995, as
12 Manager, External Relations for Florida and Georgia.
13 Prior to joining TDS telecom, I worked as a
14 telecommunications consultant with New Paradigm
15 Resources Group located in Chicago, Illinois. From
16 1986 to April 1995, I was employed by the Florida
17 Public Service Commission where I held various
18 positions in the Division of Communications and the
19 Division of Research and Regulatory Review.

20 Q. What is the purpose of your testimony?

21 A. The purpose of my testimony is to present Quincy
22 Telephone Company's position on the three options that
23 have been presented to the Florida Public Service
24 Commission for providing area code relief in the 904

1 numbering plan area.

2 Q. Was the industry able to reach a consensus on the
3 relief options available for the 904 NPA?

4 A. Yes. The industry reached a consensus that the 904 NPA
5 should be split along LATA boundaries. However, the
6 industry was not able to reach a consensus on which
7 LATAs should be split from the 904 NPA.

8 Q. Can you please describe the three options that have
9 been promoted by the industry code holders for
10 splitting the 904 NPA along LATA boundaries?

11 A. Yes. The three options proposed by the industry code
12 holders are:

13 Option 1: Assign new NPA to Pensacola, Panama City,
14 and Tallahassee LATAs,

15 Option 1A: Assign new NPA to Jacksonville and Daytona
16 LATAs, and

17 Option 2: Assign new NPA to Pensacola and Panama City
18 LATAs.

19 Q. Can you please explain the industry objectives in
20 providing NPA relief?

21 A. Yes. The industry objectives are 1) to provide the
22 longest relief period, 2) minimize number changes, and
23 3) minimize technical and operational impacts. These
24 objectives are consistent with the ICCF NPA Code Relief
25 Guidelines.

1 Q. In evaluating the various options for relief, what is
2 Quincy Telephone Company's position regarding
3 implementation of a new NPA along LATA boundaries?
4 A. Quincy Telephone Company supports option 1A, which
5 assigns a new NPA to the Jacksonville and Daytona
6 LATAs.
7 Q. Do you believe that Option 1A is consistent with the
8 industry objectives?
9 A. Yes. As stated in BellSouth's petition for approval of
10 Numbering Plan Area (NPA) relief for the 904 area
11 codes, with respect to exhaust dates, the impact to the
12 respective LATAs would be the same under Options 1A and
13 Option 1. Thus, Option 1A meets the industry objective
14 to provide the longest relief possible.
15 Q. Isn't it true that Option 1 best meets the industry
16 guidelines to minimize number changes?
17 A. Quincy Telephone Company acknowledges that Option 1
18 would impact a smaller number of customers and NXXs.
19 However, we believe that the impact to customers is
20 subjective since a change in area code will impact each
21 customer on an individual basis. Additionally, Quincy
22 Telephone Company agrees with the position advocated by
23 the Department of Management Services (DMS) that
24 changing the Tallahassee LATA will have a significant
25 and far reaching impact on state government.

1 Q. If the Florida Public Service Commission does not adopt
2 Option 1A, does Quincy Telephone Company have an
3 alternative position?

4 A. Yes. In the alternative, Quincy Telephone Company
5 supports Option 1.

6 Q. Please explain.

7 A. If the Commission rejects Option 1A, then by adopting
8 Option 1 the Commission will still be able to provide
9 relief for the greatest period of time. Under Option 1
10 the 904 NPA for Jacksonville and Daytona LATAs would be
11 expected to exhaust in September 2002. The 850 NPA for
12 Pensacola, Panama City and Tallahassee LATAs would be
13 expected to exhaust in November 2006. If the
14 Commission adopts Option 2, the 904 NPA would be
15 expected to exhaust in October 2000 and the industry
16 will be back before the Commission within the next two
17 years to prepare for another NPA split.

18 Q. Are there additional reasons why Quincy Telephone
19 Company supports Option 1 as an alternative?

20 A. Yes. Quincy Telephone Company could support Option 1
21 because the company would maintain the same NPA as
22 Tallahassee. Because there exists a strong community
23 of interest between Quincy and Tallahassee, it is
24 essential to our customers to maintain seven digit
25 dialing for local calls between Quincy and Tallahassee.

- 1 Q. Isn't it true that seven digit dialing between Quincy
2 and Tallahassee can continue regardless of whether the
3 Panama City and Tallahassee LATAs have the same NPA?
- 4 A. Yes. The technology exists to allow for seven digit
5 dialing between LATAs. However, it would create an
6 inefficient use of NXX codes because codes would also
7 need to be protected to maintain local calling between
8 the Panama City and Tallahassee LATAs.
- 9 Q. If the Commission adopts Option 2, does Quincy
10 Telephone Company have any recommendations?
- 11 A. Yes. If the Commission adopts Option 2, Quincy
12 Telephone Company requests that the Commission require
13 the necessary codes be protected to allow for seven
14 digit dialing for local calls between the Panama City
15 and Tallahassee LATAs. We would request that these
16 codes be protected for as long as possible.
- 17 Q. When should the area code relief be implemented?
- 18 A. Quincy Telephone Company supports the implementation
19 time table set forth in BellSouth's Petition.
20 Permissive dialing should begin February 24, 1997 and
21 mandatory dialing should begin February 23, 1998.
- 22 Q. Please summarize your testimony.
- 23 A. Quincy Telephone Company recommends that the Commission
24 adopt Option 1A. In the alternative Quincy Telephone
25 Company supports Option 1. Both Options 1 and 1A

1 . provide NPA relief for the greatest period of time.

2 Additionally, both Options 1 and 1A will have a

3 minimal, if any, impact on local calling

4 associated with extended area service.

5 Q. Does this conclude your testimony?

6 A. Yes.