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December 23, 1996

**Mrs. Blanca S. Bayo**  
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2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: Docket No. 961153-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Brief of the Evidence. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*

Nancy B. White

- ACK
- AFA \_\_\_\_\_
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- LIN 5
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- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg

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*[Signature]*  
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In re: Petition for Numbering )  
Plan Area Relief for 905 Area )  
Code, by BellSouth )  
Telecommunications, Inc. )

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Docket No.: 961153-TL  
Filed: December 23, 1996

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BELLSOUTH TELECOMMUNICATIONS, INC.  
BRIEF OF THE EVIDENCE

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FTSC-RECORDS/REPORTING



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Numbering )  
Plan Area Relief for 905 Area ) Docket No.: 961153-TL  
Code, by BellSouth )  
Telecommunications, Inc. ) Filed: December 23, 1996  
\_\_\_\_\_ )

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
BRIEF OF THE EVIDENCE

STATEMENT OF THE CASE

This proceeding was initiated in order to provide relief from the pending exhaustion of the 904 area code. The issues that are relevant to this proceeding were initially raised on September 20, 1996,<sup>1</sup> when BellSouth Telecommunications, Inc. ("BellSouth") filed a Petition for Numbering Plan Area Relief for 904 Area Code ("Petition").

In November of 1996, the Florida Public Service Commission conducted service hearings in the 904 area (Pensacola, Panama City, Tallahassee, Daytona Beach and Jacksonville) in order to gather customer input regarding an appropriate plan for 904 NPA relief. The formal hearing in this docket took place on December 9, 1996. Several parties presented testimony. BellSouth presented the direct testimony of Daniel M. Baeza, Director of Infrastructure Planning for the states of Florida, Alabama,

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<sup>1</sup> The NPA relief plans that were delineated in BellSouth's September 20, 1996 Petition were developed and discussed at two industry meetings held prior to the September 20 filing. Both meetings were attended by the present 904 NXX code holders. The Petition was filed by BellSouth because the code holders were unable to reach an industry consensus regarding the geographic split by which relief of the 904 area code would be provided.

Mississippi, and Louisiana. The hearing produced a transcript of 236 pages and 15 exhibits.

This Brief of the Evidence is submitted in accordance with the post-hearing procedures of Rule 25-22.056, Florida Administrative Code. A summary of BellSouth's position on each of the issues to be resolved in this docket is delineated in the following pages and marked with an asterisk.

#### **STATEMENT OF BASIC POSITIONS**

The three forms of relief options available for the 904 NPA are a geographic split, NPA overlay, and NPA boundary realignment. The industry code-holders and various other telecommunications providers operating in the 904 area code, reached a consensus that the most appropriate form of relief for 904 NPA is the geographic split along LATA boundaries. The industry developed three principal LATA boundary relief options, of which only Option 1 complies with the applicable NPA guidelines: Option 1, assigns a new NPA to Pensacola, Panama City, and Tallahassee. This option provides relief for the longest amount of time for both the new and old NPAs. The NPA is expected to need relief again in September, 2002. The new NPA, 850, will require relief approximately in November, 2006. Option 1A, assigns a new NPA to Jacksonville and Daytona. This option actually circumvents a goal of the industry guidelines to



minimize the impact of an NPA split by assigning the new NPA to areas with the greatest number of subscribers and NXXs. The impact on future NPA exhaust dates, however, would be the same as Option 1. Option 2, assigns a new NPA to Pensacola and Panama City. While this option has the advantage of affecting fewer subscribers and NXXs than Option 1 and 1A, it provides a shorter relief interval than either of those two. The 904 NPA is expected to exhaust under this option in October, 2000.

#### **STATEMENT OF POSITIONS ON THE ISSUES**

**Issue 1: What geographic split for 904 area code relief should be ordered by the Commission?**

**\*\*Position:** Of the three available options identified, option 1, which assigns a new NPA to Pensacola, Panama City, and Tallahassee, is the option that best meets the criteria set forth in the industry guidelines for NPA relief.

The North American Numbering Plan (NANP) governs the assignment and use of telephone numbers in North America. (Tr. p. 18). The NANP standard comports with the international numbering standards established by the International Telephone and Telegraph Consultative Committee (Tr. pp. 18-19). These standards provide the accepted format for telephone numbers; a three digit Numbering Plan Area (NPA), a three digit central

office code (NXX) and a four digit station address code. (Tr. p. 19). The NANP is currently administered by Bell Communications Research, Inc.<sup>2</sup> However, BellSouth, as the predominant local exchange service provider in North Florida, administers the assignment of NXX codes within a 904 NPA and monitors code utilization. The number of assigned codes is always known. Additionally, BellSouth tracks the rate of code assignment requests. With these two data elements, total assigned codes and rate of requests, a determination can be made of the forecasted exhaust of all codes, thus the exhaust of the NPA code. (Tr. p. 19 and Late Filed Exhibit No. 10).

The 904 NPA, today, encompasses the upper part of Florida from the Daytona and Jacksonville LATAs on the east through the Pensacola LATA on the west. Of the possible 792 NXX codes available for assignment in the 904 NPA, 594 NXX codes were in service as of January, 1996. The current forecasted rate of future NXX code assignments is approximately six per month for 1996, seven per month for 1997, and up to eight per month for 1998. The calculation of adding the total assigned NXX codes to the total forecasted rate of requests indicates that the current exhaust point for the 904 NPA will be May, 1998. (Tr. p. 20). BellSouth notified all known code holders and assorted other telecommunications providers doing business within the 904 area

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<sup>2</sup> On January 1, 1997, Lockheed will assume administration of the NANP. (Tr. p. 101).



code of an industry meeting. Meetings were held on July 31, 1996 and August 22, 1996 to present the relevant information to the parties and to reach a consensus of a relief plan. (Id.)

The NPA Code Relief Planning Guidelines, Revision 1 dated March 8, 1996, issued by the Industry Carriers Compatibility Forum<sup>3</sup> list three primary alternatives for NPA relief. These are an NPA geographic split; a Boundary realignment of two adjacent NPAs; or an NPA overlay. The NPA geographic split method consists of dividing the exhausting NPA into geographic areas. This method leaves the existing NPA to service, for example, the area with the highest customer density, thus minimizing number changes, and assigns the new NPA to the remaining area. The division can be made on jurisdictional, natural, or physical boundaries such as counties, cities, or rivers. This method has been the alternative chosen for nearly all NPA relief requirements occurring before 1995. The technical aspects of this method have been resolved and implementation procedures are well understood. (Tr. p. 21). The boundary realignment method can occur when an NPA requiring relief is adjacent to an NPA with spare NXX code capacity within the same state. The boundary shift allows spare codes in the adjacent NPA to be used in relief of the exhausting NPA. (Id.) The boundary realignment method

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<sup>3</sup> BellSouth is required to follow these guidelines when assigning NPAs, as noted by this Commission in Order No. PSC-95-1048-FOF-TL issued on August 23, 1995.



causes a geographic shrinkage of the physical area of the exhausting NPA and a commensurate expansion in the NPA with spare NXX capacity. This method is usually an interim measure since it generally provides short term relief. Finally, the overlay method occurs when more than one NPA serves the same geographical area. In this situation, code relief is provided by opening a new NPA within the same physical area as the NPA requiring relief. Numbers from the new NPA are assigned to new growth on a carrier neutral basis, i.e., first come first served. While mandatory number changes are usually eliminated within the overlay relief area, changes to customer dialing patterns will occur. This method necessitates ten digit dialing of local calls between the old and new NPAs. (Tr. p. 22).

In determining the appropriate area code relief plan, the industry must follow the NPA Code Relief Planning Guidelines ("Guidelines"), as well as the criteria adopted by this Commission. The Guidelines recommend that customers who undergo number changes should not be required to undergo another NPA change for a period of 8-10 years. (Exhibit 4 and Tr. p. 77). In other words, the relief should be sized to last 8 to 10 years. (Tr. pp. 77-78). Moreover, the Guidelines indicate that severe imbalances in NPA lifetimes should be avoided. (Exhibit 4, Section 4.0(h)). In addition, the number of customers who will

be affected and NPA code utilization are also factors that should be considered. (Exhibit 4, Appendix A).

While this Commission is not bound by the Guidelines, the ultimate authority is the North American Numbering Plan Administrator. If the NANP Administrator does not agree with an area code relief plan, it is possible that it will refuse to issue the new NPA. (Tr. p. 76). In other words, the NANP administrator must make an independent determination as to whether a proposed area code relief plan justifies the issuance of an NPA Code. (Tr. p. 86). If Bellcore rejected a request for an NPA Code, the industry would be required to reconvene and resubmit an alternative plan. (Tr. p. 87). The consequences of this could be a jeopardy situation where NXX codes would either have to be reclaimed or not issued. (Tr. p. 88).

On August 23, 1995, this Commission issued Order No. PSC-95-1048-FOF-TL, setting forth certain criteria for use in determining the appropriate area code relief plan. The following is that criteria, listed in order of importance and weight:

1. Competitive Concerns:
  - a. impact on the development of local exchange competition;
  - b. favor or disadvantage to particular industry segments or groups of consumers;
  - c. favor or disadvantage one technology or another.



2. Impacts to Customers:
  - a. customer confusion;
  - b. changes to customers telephone numbers;
  - c. effects on any community of interest;
  - d. implementation costs of the plan;
  - e. changes in the customers' dialing patterns;
  - f. adequate time for customer education.
3. Impacts to Carriers
  - a. implementation costs of the plan;
  - b. availability of numbering resources to code holders on an efficient and timely basis.
4. Length of Area Code Relief
  - a. efficient use of numbering resources in both the short and long term;
  - b. allowance for more future options for area code relief;
  - c. prior to exhaust, allowance for an appropriate permissive dialing period.

The industry reached consensus on using the NPA geographic split along LATA boundaries as the method for 904 NPA relief. No consensus was reached on which LATA(s) would be removed from the 904 NPA. (Tr. p. 22). The principal LATA boundary relief options under consideration by the industry code holders are:

OPTION 1 - Assign New NPA to Pensacola, Panama City, and Tallahassee

This option best meets the criteria set forth in the industry guidelines for NPA relief. (Exhibit 4). It provides relief for the longest amount of time for both the new and old NPAs. The 904 NPA would then be expected to need relief again in September, 2002. The new NPA, 850, would not exhaust until approximately November, 2006. (Tr. p. 23).



OPTION 1A - Assign New NPA to Jacksonville and Daytona  
LATAs

This option circumvents the intent of the industry guidelines to minimize the impact of an NPA split by assigning the new NPA to the areas with the greatest number of subscribers and NXXs (See DMB Exhibit 1, Page 2). The impact on future NPA exhaust dates, however, would be the same as Option 1. (Tr. p. 23).

OPTION 2 - Assign New NPA to Pensacola and Panama City  
LATAs

While this method does have the advantage of impacting fewer subscribers and NXXs than Options 1 and 1A, it provides a shorter relief interval than either of those two. The 904 NPA would be expected to exhaust under this option in October, 2000. (Tr. pp. 23-24).

During the hearing, Commissioner Kiesling inquired about a possible three way geographic NPA split. This split would divide the areas involved into: (1) Pensacola and Panama City LATAs; (2) Tallahassee LATA and County boundaries to the west of Jacksonville; and (3) Jacksonville and Daytona Beach LATA. (Tr. p. 48). The Pensacola and Panama City LATAs would exhaust in 2012; the Tallahassee LATA and the counties to the west of Jacksonville would exhaust in 2033; Jacksonville and the Daytona

Beach LATA would exhaust in 2003. (Exhibit 9). In addition, during his deposition and under cross-examination, Mr. Baeza was asked about the exhaust dates if Jacksonville and Daytona had separate area codes assigned. Jacksonville would exhaust in 2006 and Daytona would exhaust in 2030. (Tr. p. 33). Finally, the option was proposed of placing the Daytona LATA into the 352 NPA (Gainesville LATA). (Tr. pp. 56-57).

Using the criteria established by the Guidelines and found in the Commission's order, an analysis of the options set forth by the industry and discussed in the hearing reveals that Option 1 is the proposal that best meets both the Guidelines and the Order. Option 1 provides relief for the longest amount of time for both the new and old NPAs. (Tr. p. 23). Dialing patterns within the 904 area would remain the same. (Tr. p. 70). No codes would require protection. (*Id.*). Option 1 leaves the 904 area code with the Jacksonville LATA. The Jacksonville area is the fastest growing of the 904 LATAs and the area most likely to experience the appearance of Alternative Local Exchange Companies ("ALECs"). (Tr. pp. 27 and 29). The Commission's criteria lists competitive concerns as the most important. Under Option 1, however, the state of Florida will experience costs to reprint state agency publications and reprogram premises equipment. (Tr. p. 23).



Option 1A assigns the new NPA to the Jacksonville and Daytona LATAs. (Tr. p. 23). The impact on the NPA exhaust dates is the same as Option 1. (Id.). Option 1A, however, affects the greatest number of customers and NXX codes. (Id. and p. 181). Therefore, it is not consistent with the NPA guidelines. (Tr. p. 182). Moreover, if Option 1A is adopted, the new NPA code assigned to Jacksonville and Daytona would exhaust in 2002, thereby causing these communities to undergo another NPA split in less than 5 years. (Tr. p. 183). Again, this is not consistent with the NPA guidelines. In addition, these factors would cause Option 1A to not meet the Commission's criteria.

Option 2 assigns the new NPA to the Pensacola and Panama City LATAs. (Tr. p. 23). Under Option 2, there is a much shorter relief interval for the 904 NPA. (Tr. pp. 23-24). BellSouth is unaware of any party who recommended the adoption of Option 2 as a first choice.

As discussed earlier, a three-way geographic split was raised at the hearing. Such a split would not meet the NPA guidelines because of the length of time until exhaust (2012 and 2033). (Exhibit 9). If area code relief lasts longer than 8-10 years, there will be an underutilization of the NXXs in that area. (Tr. p. 78). Moreover, a split of a LATA will disrupt seven digit dialing unless certain NXX codes are protected. In



this instance 171-187 NXX codes would require protection in order to retain 7-digit dialing. (Exhibit 9).

A fourth option, that of assigning Jacksonville and Daytona separate NPAs, also does not meet the NPA guidelines. This is because the exhaust dates do not meet the recommendation of the NPA guidelines. (Tr. pp. 32-33). The final proposal made, that of moving the Daytona LATA to the Gainesville LATA, was rejected by the industry. (Tr. p. 57). Because the 352 NPA has been in existence for several months, code conflicts would erupt if the Daytona LATA was included. Some portion of customers would require ten-digit number changes. (Id.). This is because NXX codes are being assigned in the 352 NPA area that are duplicates of NXX codes in the Daytona LATA. (Tr. p. 90).

In summary, Option 1 is the proposal which best meets the NPA Guidelines, and the criteria of this Commission, and it should be adopted.

**Issue 2: How and when should the area code relief be implemented?**

**\*\*Position:** The 904 NPA relief should be implemented through a transition plan which would allow permissive dialing to begin within three to six months of the Commission's final decision and mandatory dialing to commence in the second quarter of 1998.

**CONCLUSION**

For the reasons set forth in this brief of the evidence, Option 1 is the superior geographic split plan for the 904 area. Accordingly, BellSouth requests this Commission to adopt Option 1.

Respectfully submitted this 23rd day of December, 1996.

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**CERTIFICATE OF SERVICE  
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I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 23rd day of December, 1996 to the following:

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