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

Re: 407 Area Code -- Docket No. 980671-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, "MCI") are the original and fifteen copies of MCI's prefiled direct testimony.

By copy of this letter, this document is being furnished to the parties on the attached service list.

Very truly yours,

R.D.M.

Richard D. Melson

- ACK
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- APP
- CAF
- CMU *Sirianni*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. mail or Hand Delivery (*) this 12th day of June, 1998.

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MCI TELECOMMUNICATIONS CORPORATION
AND MCI METRO ACCESS TRANSMISSION SERVICES, INC.
DIRECT TESTIMONY OF SUZANNE BROOKS
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980671-TL
JUNE 12, 1998

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Suzanne Brooks. My business address is 2250 Lakeside Boulevard, Richardson, TX, 75082.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND.

A. I am currently employed by MCI in its Local Numbering Group. I am responsible for representing MCI with respect to NPA Relief and various numbering issues and to participate in numerous state area code relief industry meetings and regulatory proceedings. I have been employed by MCI since February 1997. My responsibilities have included working on number conservation issues for the states of Texas, Colorado, Minnesota, and Missouri.

Prior to being hired by MCI, I was employed by GTE for 26 years, from 1969 to 1996. At the time I left GTE's employment, I was Senior Product Manager-Switched Access, my responsibilities included budgeting for Interexchange Access Revenues, new product development (such as 500 and 555 Access) and all Federal and State regulatory support relating to

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1 Switched Access. Other responsibilities over the years have been in
2 Traffic Study Engineering, Capital Recovery, Depreciation, Tariffs,
3 Operations, Marketing, and Operator Services.
4

5 **II. PURPOSE OF TESTIMONY**

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

7 **A.** The purpose of my testimony is to identify competitive issues related to the
8 proposal for area code relief in the 407 area code and discuss various
9 options for relief. I also discuss some of the methods the Florida Public
10 Service Commission ("Commission") should consider to conserve
11 numbers, extend the lives of area codes, and reduce the need of creating
12 new area codes in the future. Considering that this is the third area code
13 relief hearing this Commission has had to have in less than a year, the issue
14 of number conservation has become a critical one.
15

16 **III. AREA CODE RELIEF ALTERNATIVES**

17 **Q. WHAT AREA CODE ALTERNATIVES ARE BEING CONSIDERED FOR**
18 **THE 407 AREA CODE?**

19 **A.** The Commission was notified by the numbering administrator that some
20 members of the industry were proposing an overlay plan for area code relief in
21 the 407 area. The Commission on its own initiative has scheduled this matter
22 for hearings to seek recommendations for area code relief.
23

1 Q. WHAT TYPES OF IMPACTS SHOULD THE COMMISSION
2 CONSIDER WHEN DECIDING WHICH ALTERNATIVE IS BEST
3 FOR THE ORLANDO AREA?

4 A. There are several alternatives that can be considered, individually or in
5 combination, to provide the greatest utilization of numbers.

6

7 Q. WHAT ARE THE ALTERNATIVES AVAILABLE THAT COULD
8 MITIGATE THE EXHAUST OF AREA CODE 407?

9 A. There are several alternatives available that could offer short term and long
10 term relief opportunities. The Commission could look at sequential
11 number assignment, rate center consolidations, and number pooling in
12 conjunction with an area code split or overlay. This list is not inclusive and
13 serves only as an illustrative example of a few of the alternatives that are
14 available to the Commission.

15

16 Q. WILL YOU BRIEFLY DESCRIBE THESE ALTERNATIVES?

17 A. Sequential Number Assignment is where carriers who have been assigned a
18 10-thousand block of numbers, must assign those numbers sequentially for
19 a thousand block at a time until utilization of that block reaches, say 80 to
20 90 percent, before beginning the assignment of numbers from another 1000
21 block within that NXX. Assigning numbers in this manner assures greater
22 accessibility to blocks of numbers should the Commission decide to
23 implement number pooling.

24

1 Rate Center Consolidation (“RCC”) involves the combining, or collapsing,
2 of existing incumbent LEC rating areas into fewer rate areas, so that fewer
3 NXXs are required by a carrier serving a local calling area.

4
5 Number Pooling involves the sharing of a block of ten thousand numbers
6 among two or more carriers. The industry, in various forums such as the
7 Industry Number Committee (INC) and also Numbering Resource
8 Optimization Working Group (NRO-WG) along with several state
9 commissions (Illinois, New York and Pennsylvania) are examining number
10 pooling alternatives.

11
12 **Q. ARE THESE THE ONLY ALTERNATIVES AVAILABLE THAT MCI**
13 **IS SUGGESTING?**

14 **A. No. MCI is only pointing out a few of the options that other state**
15 **commissions have implemented or are currently examining as alternatives**
16 **to area code relief, in conjunction with an area code split or overlay, in an**
17 **attempt to further extend the life of an area code.**

18
19 **Q. WHAT ARE THE IMPACTS OF THE SPLIT AND OVERLAY**
20 **ALTERNATIVES ON END USERS?**

21 **A. Unfortunately, some end users will suffer some cost and disruption under**
22 **either the split or overlay alternatives, although the degree to which end**
23 **users are negatively impacted differs based on whether a split or overlay**
24 **alternative is selected.**

25

1 The end user impacts of an overlay include: loss of all 7-digit local dialing
2 (because the Federal Communications Commission (“FCC”) requires
3 mandatory 10-digit dialing for all local calls as a condition for overlay
4 implementation); loss of the ability to associate an area code with a unique
5 geographic area code; confusion resulting from different area codes
6 assigned in the same home, business or neighborhood; cost to customers
7 (throughout the overlay area) that currently use their 7-digit number for
8 advertising, stationery, etc., for new materials with their 10-digit number;
9 and cost to customers (throughout the overlay area) to reprogram or
10 replace automatic dialing systems (e.g., home alarm and apartment security
11 systems, elevator emergency phones, etc.) that are currently programmed
12 for 7-digits. Further safety concerns are created during any period when
13 such devices are incorrectly programmed.

14

15 The end user impacts of an area code split include: need for customers in a
16 portion of the existing area code to change area codes; some additional 10-
17 digit dialing required for calling between the old and new area codes; and
18 cost to customers in the new area code to change advertising, stationery,
19 etc., to show the new area code.

20

21 **V. CONCLUSION**

22 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION**
23 **REGARDING AREA CODE RELIEF FOR THE ORLANDO AREA?**

24 **A. MCI believes that a geographic split or an overlay is not the only solution**
25 **to relieve number exhaust in the Orlando area. MCI suggests that the**

1 Commission immediately establish a workshop or other appropriate
2 process to consider all number conservation mechanisms (including, but
3 not limited to those suggested above) in conjunction with and perhaps prior
4 to that of any area code split or overlay.

5

6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

7 A. Yes, it does.