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RECORDS AND REPORTING

June 23, 2000

VIA 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: Request for Review of Proposed Numbering Plan for the 904 Area Code
Docket No. 990517-TL

Dear Ms. Bayo:

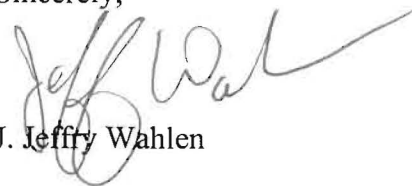
Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Posthearing Statement.

Also enclosed is a diskette containing the above Posthearing Statement originally typed in Microsoft Word 97 format which has been saved in Rich Text format for use with WordPerfect.

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

APP
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Enclosures

cc: All Parties of Record

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of Proposed
Numbering Plan for the 904 Area Code

DOCKET NO. 990517-TL
FILED: June 23, 2000

ALLTEL'S POSTHEARING STATEMENT

ALLTEL Florida, Inc. ("ALLTEL" or the "Company"), pursuant to Order No. PSC-99-2145-TL, submits the following Posthearing Statement:

I.**Introduction**

By Petition dated August 16, 1999 ("Petition"), the North American Numbering Plan Administrator ("NANPA") requested that the Florida Public Service Commission ("FPSC" or "Commission") approve an NPA relief plan for the 904 NPA. The Petition recommended an all services distributed overlay for the 904 NPA. [Petition at 1; Eudy, Tr. 118] After several public hearings, this matter was set for final hearing on May 18, 2000. By agreement of the parties, all of the prefiled direct and rebuttal testimony and related exhibits were admitted into the record without cross-examination. ALLTEL sponsored the direct and rebuttal testimony of Harriet E. Eudy, which was admitted into the record at Tr. 114 and 121, respectively. Ms. Eudy's prefiled exhibit was identified as Exhibit No. 13, and admitted into the record at Tr. 227.

II.**ALLTEL's Basic Position**

ALLTEL supports Alternative 1, which is an all services distributed overlay and was the consensus recommendation of the industry. If the Commission declines to adopt Alternative 1,

ALLTEL recommends Alternative 5, which is a geographic split with Duval and Nassau Counties as Area A and the remaining counties in the 904 NPA as Area B.

III.

Issues and Positions

ALLTEL's positions on the issues, and argument/discussion in support of its position on the issues, are set forth below. The portions indicated with an asterisk (*) are identified for inclusion in the Staff Recommendation.

Issue 1a: **Should the Commission approve the industry's consensus relief plans for the following area codes:**

A) – C) **ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.**

D) **904**

Position: * Yes.

Discussion: The record in this case reflects 17 alternative relief plans. The Industry Participants reached consensus on Alternative 1, which is an all services distributed growth overlay. Under Alternative 1, a new NPA would be overlaid over the same geographic area covered by the existing 904 NPA. [Tr. 118] All existing customers would retain their current area code and telephone numbers. [Id.] The plan would involve 10 digit dialing both within and across NPA boundaries of the existing NPA and the new NPA. [Id]

Alternative 1 best meets the Industry Numbering Committee's NPA Code Relief Planning and Notification Guidelines ("Guidelines"), and should be adopted by the Commission. [Tr. 118-119] The FPSC has considered the Guidelines in other NPA relief cases and should do so in this case. Some of the NPA relief planning principles outlined in the Guidelines include:

1. Relief options shall cover a period of at least five years beyond the predicted date of exhaust. [Tr. 117]

2. Customers who undergo number changes shall not be required to change again for a period of 8-10 years. [Id.]

3. The use of protected codes (NXXs), which permit 7-digit dialing across NPA boundaries, should be eliminated or reduced to an absolute minimum. [Id.]

4. Ideally, all of the codes in a given NXX shall exhaust about the same time in the case of splits. [Id.]

5. The relief plan chosen should seek to minimize end users' confusion while balancing the cost of implementation by all affected parties. [Id.]

6. All efforts should be made to choose a plan that does not favor a particular interest group. [Id.]

7. Dialing patterns for local calls should be considered. [Id.]

These Guidelines were considered by the Industry Participants during their relief planning meetings for the 904 NPA. The minutes of those meetings, which are attached to the Petition, outline the reasons the Industry Participants agreed that Alternative 1 is the best alternative. Specifically, as noted in the direct testimony of Mr. Tom Foley, the Industry Participants considered six (6) alternatives. [Tr. 32-33] Alternatives 3, 4, 5 and 6 were eliminated by consensus, because they would divide large local calling areas and would require customers to change their telephone numbers. [Tr. 33] Alternative 2 (concentrated growth overlay) was eliminated for five reasons. [Tr. 33] Alternative 1 was the consensus choice by process of elimination. This alternative best meets the Industry Guidelines for NPA relief and should be adopted by the FPSC in this case.

The Commission should not adopt Alternatives 7 through 17. Each of these alternatives and the reasons they should not be adopted are set forth below:

Alternative 7

This geographic split would result in Clay and Putnam counties having two area codes; would divide numerous local calling areas; and would result in NPAs with unbalanced lives. [Tr. 122] Section 5.0(h) of the Guidelines provides that the newly created geographic areas have projected lives of approximately the same number of years. [Id.] Alternative Number 7 results in a projected life of only 2.3 years for Area A versus 36.2 years for Area B. [Id.] Additionally, the fastest growing area ends up with the shortest (by a large amount) of the two lives. [Id.] Guideline 5.0(f) also provides that customers not be required to change again for a period of 8-10 years. [Id.] An exhaust period of only 2.3 years for Area A will likely result in another change for Area A before ten years is up. [Id]

To avoid customer confusion when implementing geographic splits, the FPSC should avoid relief plans that would further split counties into multiple area codes. [Tr. 122-123] ALLTEL's Hastings exchange has local calling, dialed on a 7-digit basis, that terminates to Palatka and St. Augustine. [[Id.] Under Alternative Number 7, these customers would be inconvenienced by having to dial 10-digits to complete local calls in one direction to Palatka while continuing to dial 7 digits in the other direction to St. Augustine. [Id.]

Alternative 8

This alternative would require the use of two new NPAs, rather than one. [Tr. 123] The use of two new NPAs appears to be contrary to the Guideline 5.0(h), which requires relief plans to result in the most effective use possible of all codes serving a given area. [Id.] In addition,

the difference in NPA lifetimes for Area A and B compared to Area C would exceed the 15 years maximum included in the Guidelines. [Id.]

Alternative 9

This alternative results in unbalanced lives for Area A and B compared to Area C in violation of the Guidelines. [Tr. 123-124] Moreover, including Columbia County and a small portion of Union County in Area A and B creates an “island” of customers within Area C that would have different area codes. [Id.] There is quite a bit of local calling that exists between these counties. [Tr. 124] For example, Branford and Wellborn, both located in Suwannee County, have local calling to Lake City in Columbia County. [Id.] White Springs, which is located in Hamilton County has local calling to Lake City, and Boys Ranch, Live Oak, and Luraville, all in Suwannee County have ECS calling to Lake City. Raiford, which is in Union County has the 25 cent plan to Lake City. [Id.] All of these plans utilize 7-digit dialing. [Id.] This would result in significant customer confusion due to the need to dial extra digits across the NPA boundaries. [Id.] This alternative also requires the use of two new NPAs instead of one further exacerbating the problem of division of local calling areas. [Id.] Putnam and Union counties could also potentially have three area codes. One for the portion included in Area C and two for the portion included in Area A and B. [Id.] All of these problems can be avoided by rejecting Alternative Number 9. [Id.]

Alternative 10

There is a large community of interest for local calling into Jacksonville from Baker and Clay counties. [Tr. 124-125] This alternative would divide local calling areas for those counties, and cause customer confusion. [Tr. 125]

Alternative 11

As with Alternative Number 7, this alternative would result in unbalanced lives between Areas A and B compared to Area C; would require the use of two new NPAs rather than one (like Alternative Number 10) and would divide local calling areas. [Tr. 125] Under this alternative, Clay and Putnam counties could potentially have three area codes; one for the portions included in Area C and two for the portions included in Areas A and B. [Id.] All of these problems can be avoided by rejecting Alternative Number 11. [Id.]

Alternative 12

This alternative would divide local calling areas and have a dividing line that does not respect geographic or political boundaries. [Tr. 125-126] It is better for dividing lines for the geographic splits to remain along county lines or other political boundaries, or neutral geographic boundaries, to avoid increased customer confusion. [Id.] Under this alternative, the geographic split would divide both Clay and Putnam counties, which should be avoided. [Id.]

Alternative 13

Alternative Number 13 has the same problems as Alternative Number 12, and should be rejected for the same reasons that Alternative Number 12 should be rejected. [Tr. 126]

Alternative 14

This alternative would require the use of two new NPAs and still result in unbalanced lives for Area A compared to Areas B and C. [Tr. 126] This plan would also divide local calling areas. [Id.] These problems can be avoided by rejecting this alternative. [Id.]

Alternative 15

Alternative Number 15 has the same problems as Alternative Number 14, and should be rejected for the same reasons that Number 14 should be rejected. [Tr. 127]

Alternative 16

A staggered geographic split as proposed in Part A and B of Alternative Number 16 does little more than delay implementation of the final NPA code relief plan solution. [Tr. 127] Option 1 of Part B would provide the same result as Alternative Number 6, but would require this to be done in two phases rather than one. [Id.] Option 2 would require the use of an additional area code, which may not be the most efficient use of number resources. [Id.] Additionally, this alternative has the same problems as those outlined above for Alternative Number 9, regarding interruption of 7-digit local calling areas. [Id.]

Alternative 17

This alternative would divide Clay County and disrupt some local calling areas. [Tr. 127-128] ALLTEL's Florahome exchange is split between two counties, and has two different calling scopes, which has created a significant amount of customer confusion. [Id.] This resulted from a Commission order years ago. [Id.] Further division of Clay County will simply increase the level of confusion for customers. [Id.] In addition, ALLTEL's Melrose exchange, located in Alachua, Bradford, Clay and Putnam Counties, is split 4 ways. [Id.] Further division would increase the level of confusion. [Id.]

Issue 1b: **If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:**

A) – C) **ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.**

D) 904

Position: * If the Commission declines to adopt Alternative 1, ALLTEL recommends Alternative 5, which is a geographic split with Duval and Nassau Counties as Area A and the remaining counties in the 904 NPA as Area B.

Discussion: If the Commission declines to adopt Alternative 1, the Commission should adopt Alternative 5, because that alternative would have the least impact on ALLTEL's customers. [Tr. 128-129] ALLTEL's Callahan and Hilliard exchanges, located in Nassau County, have 7-digit local or ECS calling between each other and to Jacksonville. [id] Alternative Number 5 would keep this area together and would not result in customer confusion by requiring a change in dialing. [Id.]

Issue 2a: What number conservation measure(s), if any, should be implemented for the following area codes:

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

Position: * Number pooling may provide an opportunity for extending the life of the 904 area code. To implement number pooling in the 904 area code, software release 3.0 should be used and should be limited to Local Number Portability (LNP) capable central offices.

Discussion ALLTEL's position on this issue is supported in the record by its answer to Staff First Set of Interrogatories, No. 5, which is included in Exhibit 14, and by the direct testimony of Scott Ludwikowski of Sprint PCS at Tr. 93.

Issue 2b: If conservation measures are to be implemented, when should they be implemented?

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

Position: * The Commission should allow a reasonable time for the implementation of any number conservation measures, and they should only be applied prospectively.

Issue 3: **What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

A) – C) **ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.**

D) **904**

Position: * If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls.

Discussion ALLTEL's position on this issue is supported in the record by the testimony of Ms. Eudy at Tr. 120.

Issue 4: **What is the appropriate relief plan implementation schedule for the following area codes:**

A) – C) **ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.**

D) **904**

Position: * Once the FPSC approves the recommended relief plan, NANA can assign the new NPA within 14 days. The transitional dialing period, which permits customers to dial service on ten digits, should begin 0 days after the NPA is assigned and should continue for 180 days.

Discussion ALLTEL's position on this issue is supported in the record by the testimony of Ms. Eudy at Tr. 120.

DATED this 23rd day of June, 2000.

A handwritten signature in cursive script, appearing to read "J. Wahlen", is written over a horizontal line.

J. JEFFRY WAHLEN
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ATTORNEYS FOR ALLTEL FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 23rd day of June, 2000, to the following:

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