

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
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March 11, 2005

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850


**Re: Docket No.:**  
**Petition of BellSouth to realign exchange boundaries of St. Johns, St. Augustine, Ponte Vedra Beach, Jacksonville and Green Cove Springs and consolidate the Julington Exchange with the St. Johns Exchange**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Realignment of Exchange Boundaries for Several of BellSouth's Northeast Exchanges and Consolidation of the Julington Exchange with the St. Johns Exchange, which we ask that you file in the captioned *new* 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 to the parties shown on the attached Certificate of Service.

Sincerely,

  
Nancy B. White

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey

**CERTIFICATE OF SERVICE**  
**Petition of BellSouth to realign exchange boundaries of St. Johns, St. Augustine, Ponte Vedra Beach, Jacksonville and Green Cove Springs and consolidate the Julington Exchange with the St. Johns Exchange**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail this 11th day of March, 2005 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
Nancy B. White

**FLORIDA PUBLIC SERVICE COMMISSION**

Petition of BellSouth to realign exchange ) Docket No. \_\_\_\_\_  
boundaries of St. Johns, St. Augustine, )  
Ponte Vedra Beach, Jacksonville and Green )  
Cove Springs and consolidate the Julington )  
Exchange with the St. Johns Exchange )  
\_\_\_\_\_ ) Filed: March 11, 2005

**PETITION FOR REALIGNMENT OF EXCHANGE  
BOUNDARIES FOR SEVERAL OF BELLSOUTH'S  
NORTHEAST EXCHANGES AND  
CONSOLIDATION OF THE JULINGTON  
EXCHANGE WITH THE ST. JOHNS EXCHANGE**

BellSouth Telecommunications, Inc. (“BellSouth”), pursuant to Rule 28-106.104, Florida Administrative Code, petitions the Florida Public Service Commission to approve the boundary realignment and exchange consolidation discussed below. In support of this petition, BellSouth states:

**PARTIES**

1. BellSouth is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and intraLATA toll telecommunications in the State of Florida.

2. BellSouth’s principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130. Pleadings and process may be served upon:

Nancy White  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301

## BACKGROUND AND REQUEST FOR RELIEF

3. BellSouth currently provides telecommunications service as the incumbent local exchange company (ILEC) in Green Cove Springs, Julington, Ponte Vedra Beach, Jacksonville, St. Augustine and St. Johns exchanges.

4. The calling scope and local exchange rates for these exchanges varies by exchange. Attachment A provides the calling scope and basic local exchange rates for these exchanges.

5. BellSouth is proposing to move portions of the exchanges listed in (3.) above into an expanded St. Johns exchange. (See Attachment B) BellSouth believes the changes will: better align the community of interest that exists within northern St. Johns County; align exchange boundaries with proposed high growth residential developments in St. Johns County and; allow BellSouth to eliminate some potential network service issues. In addition to these benefits, BellSouth believes that most customers will benefit from the expanded local calling scope discussed below. Listed below are the specific realignments proposed by BellSouth:

- a. Portion of Ponte Vedra Beach exchange will be moved to the new St. Johns exchange.
- b. Portion of St. Augustine exchange will be moved to the new St. Johns exchange.
- c. Portion of Jacksonville exchange will be moved to the new St. Johns exchange.
- d. Portion of Green Cove Springs exchange will be moved to the new St. Johns exchange.

6. In addition to the realignments listed above, BellSouth also proposes to consolidate the Julington exchange into the new St. Johns exchange for the same reasons stated in (5.) above.

## STEP-BY-STEP NETWORK CHANGES

7. Since this proposal is so complex, BellSouth plans to handle the various moves and consolidations in five (5) different phases. Although BellSouth has identified them in a certain sequence, the phases are not dependent on each other and can be handled in a different sequence if a reason arises.

8. First Phase, BellSouth proposes to move a portion of the St. Augustine, Jacksonville and Ponte Vedra exchanges to the new St. Johns exchange. (See Attachment C) The realignment of the Ponte Vedra customers will require 119 Ponte Vedra retail and resale and 5 UNE-P customers to change their telephone numbers to new St. Johns numbers placed in the St. Augustine Main switch. If a Ponte Vedra customer elects to retain their Ponte Vedra calling scope and rates, the customer will still be required to change their telephone number to a new NPA NXX established for the grandfathering of the Ponte Vedra customer.<sup>1</sup> Due to the adverse impact on numbering resources, BellSouth proposes to allow the grandfathered Ponte Vedra customers to retain the grandfathered service for a period of two (2) years.<sup>2</sup> If any of the grandfathered customers want to add an additional line, the customer will have to get a number that is provided in the new St. Johns exchange and billed the St. Johns rates. BellSouth believes the change of the serving wire center for these Ponte Vedra customers will allow BellSouth to eliminate the feeder portion of the network that currently crosses the Inter-coastal Waterway and consolidate the areas West of the river. Additionally, BellSouth believes this modification in the network will provide these customers with a more

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<sup>1</sup> If a customer selects to be grandfathered and wants to change calling scopes before the NXX is moved to the St. Johns Exchange, the customer will have to take a second number change.

reliable service with less chance of a future outage and establish a better boundary for the new St. Johns exchange.

9. The second portion of this phase is to move a portion of the Jacksonville exchange into the new St. Johns exchange. Since there are no customers in this portion of the Jacksonville exchange being moved in this phase, there will be no impact on calling scopes or telephone numbers.

10. The third portion of this phase is to move the northern portion of the St. Augustine exchange into the new St. Johns exchange. As for the St. Augustine customers, BellSouth proposes to move 2,509 retail and resale and 177 UNE-P customers to the new St. John's exchange. These customers will be required to change their telephone number and will be assigned new St. Johns telephone numbers. If a St. Augustine customer elects to retain their St. Augustine calling scope and rates, the customer will still be required to change their telephone number to a new NPA NXX established for the grandfathering of the St. Augustine customer.<sup>1</sup> Once again, due to the adverse impact on numbering resources, BellSouth proposes to allow the grandfathered St. Augustine customers to retain the grandfathered service for a period of two (2) years.<sup>2</sup> If any of the grandfathered customers want to add an additional line, the customer will have to get a number that is provided in the new St. Johns exchange and billed the St. Johns rates. In addition, BellSouth would also propose to move the St. Augustine customers that were grandfathered when the St. Johns exchange was originally created to the new St. Johns exchange at the same time as all of the other grandfathered customers in this proposal, in 2 years. This change will not only better utilize the numbering

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<sup>2</sup> Due to the limitation of BellSouth's switches to have different calling scopes to different blocks within an NPA NXX, BellSouth will have to retain the full NXX until such time that the calling scope and rates for

resources in the 904-522 NXX but will also provide consistency throughout the exchange.

11. Second Phase, BellSouth will move the existing boundary of the Julington exchange to encompass some of the Green Cove Springs exchange. Currently, there are no working lines in this portion of the proposal. (See Attachment D)

12. Third Phase, BellSouth will move a portion of the Jacksonville exchange to the Julington exchange in order to conform to planned development boundaries. There are 16 retail and resale customers in this portion of the proposal that will have to take a number change. If these customers want to retain their existing rates and calling scopes, the customer would still have to take a number change to a new NPA NXX reserved specifically for allowing the Jacksonville grandfathering of these customers.<sup>1</sup> (See Attachment E) The proposal for grandfathering of these customers would be the same as for the Ponte Vedra and St. Augustine customers.

13. Fourth Phase, BellSouth will move a portion of the Green Cove Springs Exchange from the Green Cove Springs wire center to the World Golf wire center, which is located in the St. Johns exchange. This realignment will require 840 Green Cove Springs retail and resale and 41 UNE-P working lines to change telephone numbers. (See Attachment F) If the customers want to retain their existing rates and calling scopes, the customer will still have to take a number change to a new NPA NXX reserved specifically for allowing the Green Cove Springs grandfathering of these customers.<sup>1</sup> The proposal for grandfathering of these customers would be the same as the other grandfathered customers in the other exchanges.

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the grandfathered areas mirrors the exchange to which the numbers are assigned.

14. Fifth Phase, BellSouth will consolidate the Julington exchange into the St. Johns exchange. There are no working lines that will be required to take a number change as a result of this consolidation. (See Attachment G) Attachment H shows the final exchange boundary for the new St. Johns exchange. However, these customers will have a calling scope and rate change as a result of this consolidation.

#### **CUSTOMER NUMBER CHANGE AND CALLING IMPACT**

15. As indicated above, 3,560 retail and resale working lines will move from their current exchange to the St. Johns exchange when this process is complete. These customers will have to take a number change and will have the calling scope and rates of the new St. Johns exchange. If these customers want to retain their current calling scope and rates, BellSouth proposes to provide a grandfathering option for each customer.<sup>1</sup> However, the customer will still be required to take a number change. Except for the UNE-P customers of Competitive Local Exchange Carriers (CLECs), BellSouth is not aware of how many number changes will be required by the CLECs. There are two main impacts to the customers from these changes. First, all of the customers will have to take a number change. Second, customers may experience a calling pattern change and an increase in the rates from the rates that they are currently paying as a result of the overall proposal if they do not elect to be grandfathered.

16. The proposed changes will require all customers in these areas to take a number change. For customers that want the new St. Johns calling scope, the customer will take a number change to the new St. Johns exchange and will be billed the St. Johns rates. In an effort to minimize the initial impact of this proposed realignment, BellSouth



proposes to provide a grandfather period of 2 years for all customers that want to retain their old calling scopes and rates. At the end of this 2 year period, BellSouth will move these customers to the new St. Johns calling scope and rates utilizing its annual price regulation filing. If the customer wants an additional line at his premises, BellSouth will assign the additional line a new number from numbers assigned in the St. Johns exchange.

17. BellSouth proposes to minimize the impact of the number change by offering retail and resale customers a reference of calls, if requested, until such time as the customer's directories are reissued with their new telephone number.

18. As for the calling area impacts, BellSouth will allow the customers two options. The customers can retain their existing calling scope and rates for their existing service for a period of two (2) years or, they can elect to take the calling scope and rates of the new St. Johns exchange. Attachment A provides the calling scopes and rates of each exchange impacted by this proposal.

### **NOTICE TO CUSTOMERS**

19. Notification will be provided to retail and wholesale customers. BellSouth will provide at least two (2) notices of the proposed changes to its retail customers. BellSouth will provide these notices to the Commission Staff for review prior to issuance of each notice. The notices will provide the timeframes as to when the customers must make the necessary selection of calling plan and rates. BellSouth believes that these notifications will allow for a timely completion of this project.

20. As for the wholesale customers, BellSouth will work with the CLECs to implement the changes via a specific written notice, general proposal overview meeting and a technical network meeting. BellSouth believes these various types of notices will not only provide a general overview of the realignment proposal but also provide technical details to address any issue that a given carrier may raise.

#### ADDITIONAL NUMBERING RESOURCES

21. As discussed above, BellSouth requests the Commission to grant BellSouth four (4) NPA NXXs for grandfathered customers that will eventually move to the St. Johns exchange, and four (4) NPA-NXX-X thousand blocks for the St. Johns exchange to handle the number of customers that may elect the new St. Johns calling scope and rates. Although this approach will make 44,000 numbers unavailable for a relatively short period of time, two (2) years, BellSouth believes this will not adversely impact the life of the 904 area code. Further, BellSouth believes this approach will minimize the adverse customer impacts due to the necessity of having multiple number changes as a result of this proposal as well as provide a more efficient use of telephone numbers in the area due to the consolidation of exchanges. With this proposal, customers that are required to take a number change will only have to change numbers once while being able to initially select their calling scope and rates. BellSouth will donate the vacant thousand blocks to the St. Johns number pool as various portions of the proposal are complete and the numbering resources are no longer needed. Due to the phased approach of the proposal, BellSouth will request the numbering resources when necessary to avoid the 6-month limitation on holding numbers in its inventory.

22. BellSouth requests that Commission approve the proposal described above and allow the various parties to work through the implementation of the plan in an effort to minimize any impact on the carriers and customers.

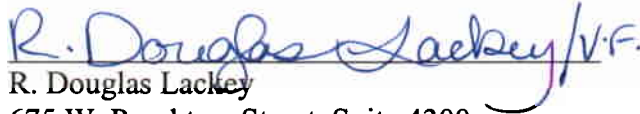
WHEREFORE, BellSouth requests that the Commission grant BellSouth's Petition for Realignment of Exchange Boundaries.

Respectfully submitted this 11th day of March, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in blue ink, with a horizontal line underneath.

Nancy B. White  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
Tel. No. (305) 347-5558

Handwritten signature of R. Douglas Lackey in blue ink, with a horizontal line underneath.

R. Douglas Lackey  
675 W. Peachtree Street, Suite 4300  
Atlanta, GA 30375  
(404) 335-0747

576368

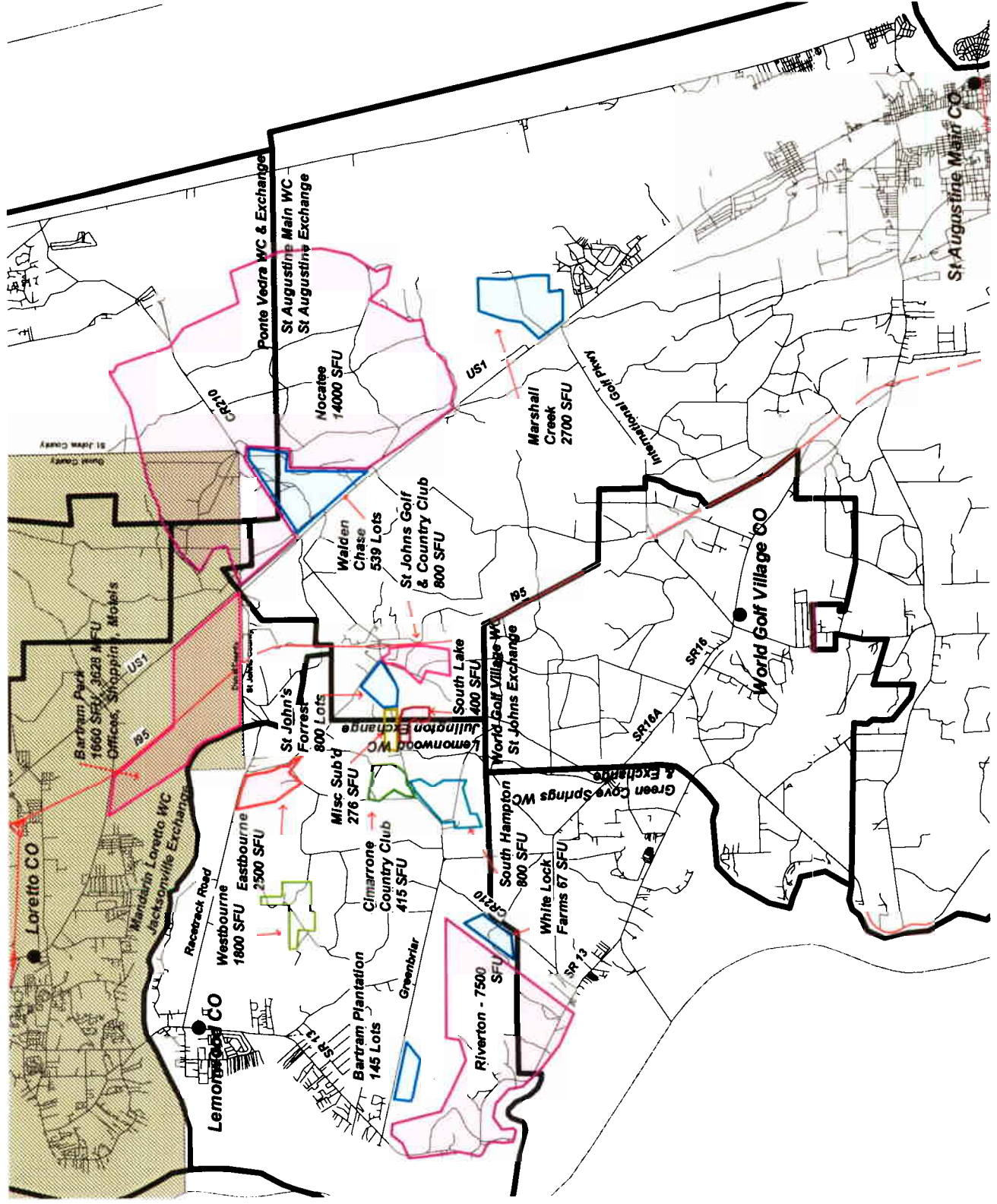
**Existing  
Calling Scopes and Rates**

**Attachment A**

| <b>Exchange</b>    | <b>EAS</b>   | <b>ECS</b>   | <b>Single Line<br/>Res Rate</b> | <b>Single Line<br/>Bus Rate</b> |
|--------------------|--|--|---------------------------------|---------------------------------|
| Jacksonville       | Baldwin<br>Callahan (ICE)<br>Hillard (ICE)<br>Jacksonville Beach<br>Julington<br>Maxville<br>MacClenney (ICE)<br>Middleburg<br>Orange Park<br>Ponte Vedra Beach<br>Sanderson (ICE)<br>St. Johns<br>Yulee | Fernandina Beach<br>Palatka<br>St. Augustine                       | \$11.11                         | \$29.68                         |
| Green Cove Springs | Maxville<br>Middleburg<br>Jacksonville<br>Julington<br>Orange Park<br>St. Augustine  | Palatka<br>St. Johns   | \$10.96                         | \$29.05                         |
| St. Johns          | Hastings (ICE)<br>Jacksonville<br>Jacksonville Beach<br>Julington<br>Orange Park<br>Ponte Vedra Beach<br>St. Augustine   | Green Cove Springs<br>Palatka                                      | \$11.11                         | \$29.68                         |
| St. Augustine      | Green Cove Springs<br>Hastings (ICE)<br>Julington<br>St. Johns   | Jacksonville<br>Jacksonville Beach<br>Palatka<br>Ponte Vedra Beach | \$9.40                          | \$24.75                         |
| Ponte Vedra Beach  | Jacksonville<br>Jacksonville Beach<br>St. Johns  | Julington<br>St. Augustine   | \$10.96                         | \$29.05                         |
| Julington          | Jacksonville<br>Orange Park<br>St. Augustine<br>St. Johns  | Green Cove Springs<br>Palatka<br>Ponte Vedra Beach                 | \$10.96                         | \$29.05                         |

# ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT EXISTING BOUNDARIES

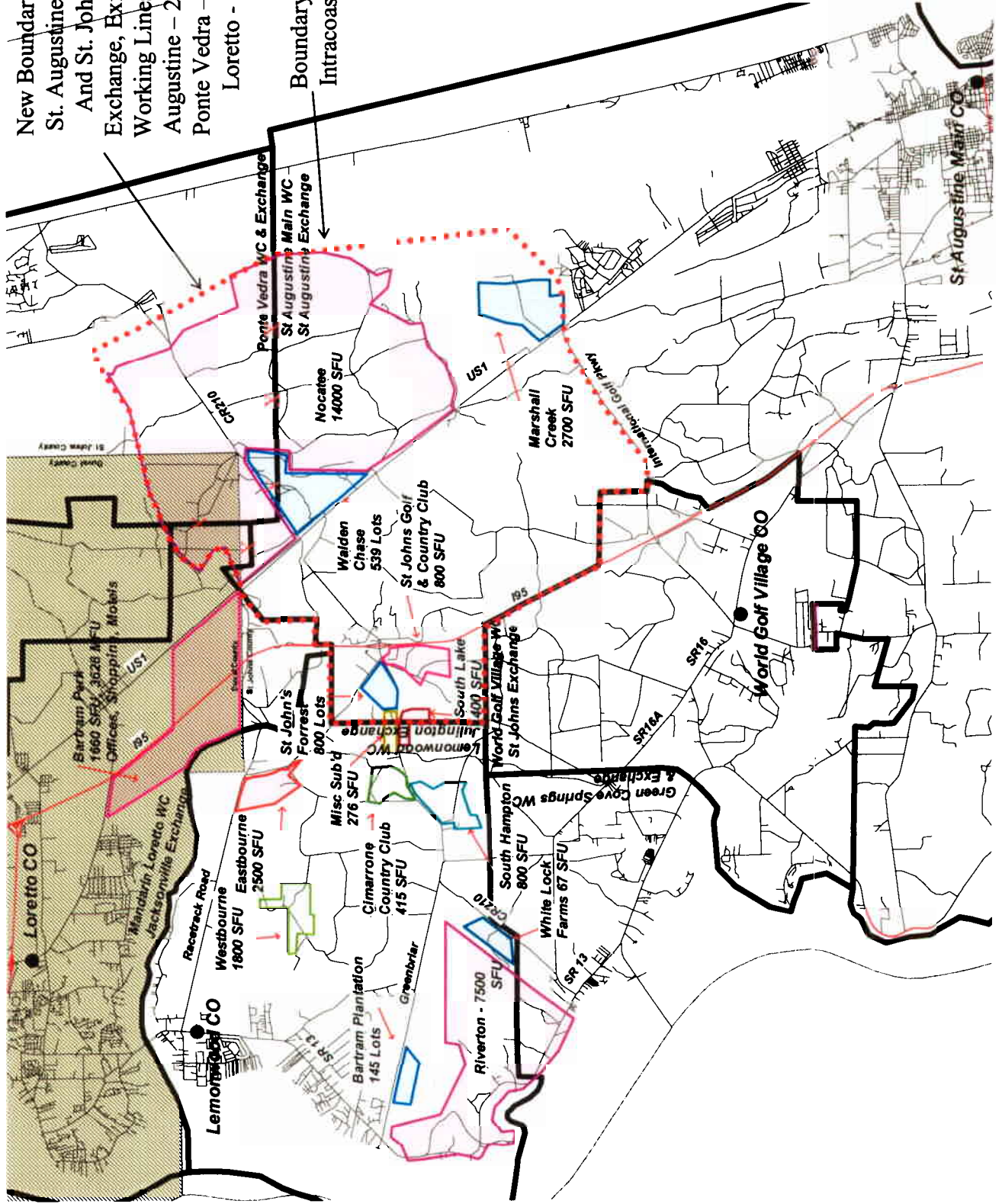
## Attachment B



**ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT  
PHASE 1 DETAIL**

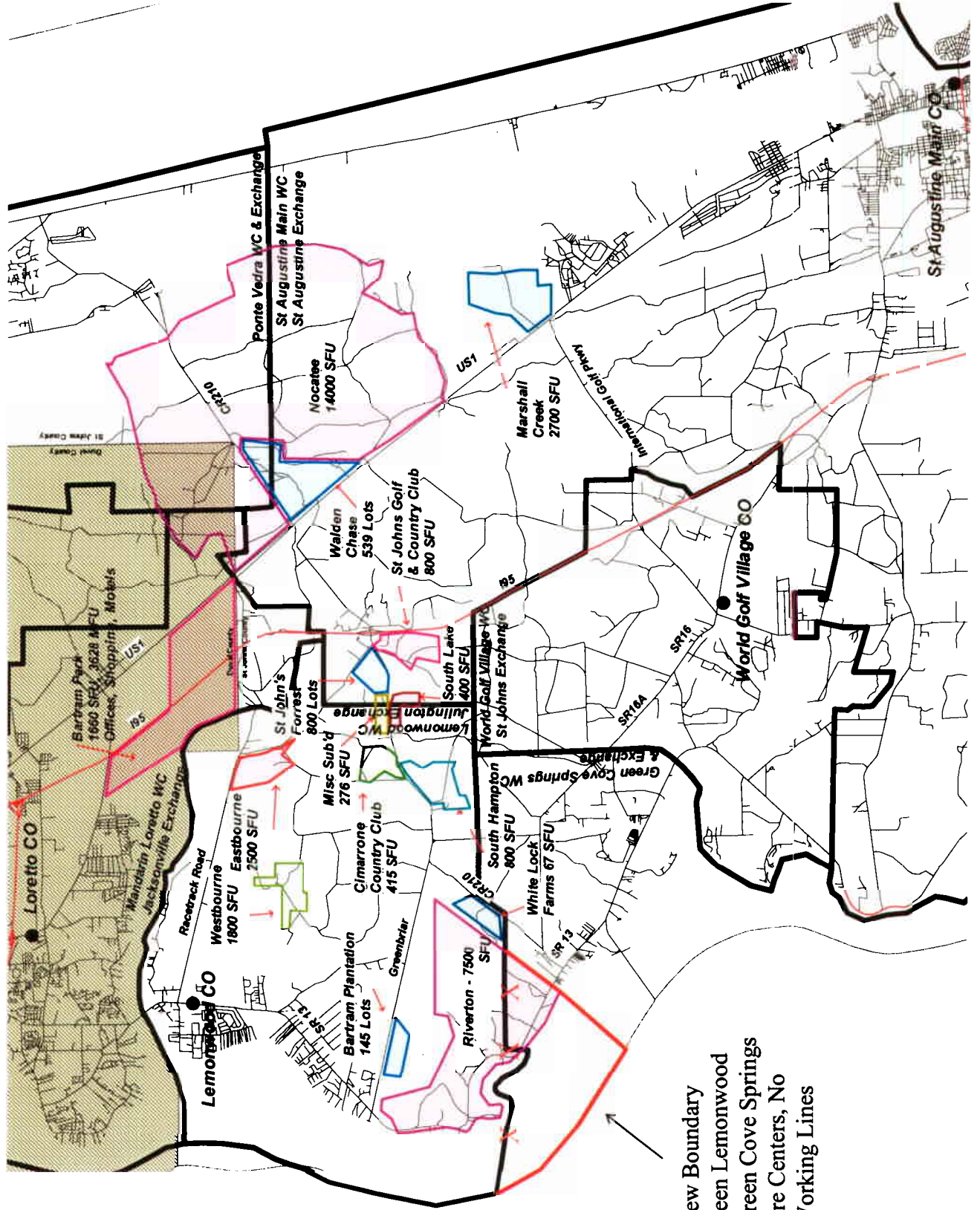
**Attachment C**

New Boundary For  
St. Augustine WC  
And St. Johns  
Exchange, Existing  
Working Lines: St.  
Augustine - 2,509,  
Ponte Vedra - 119,  
Loretto - 0



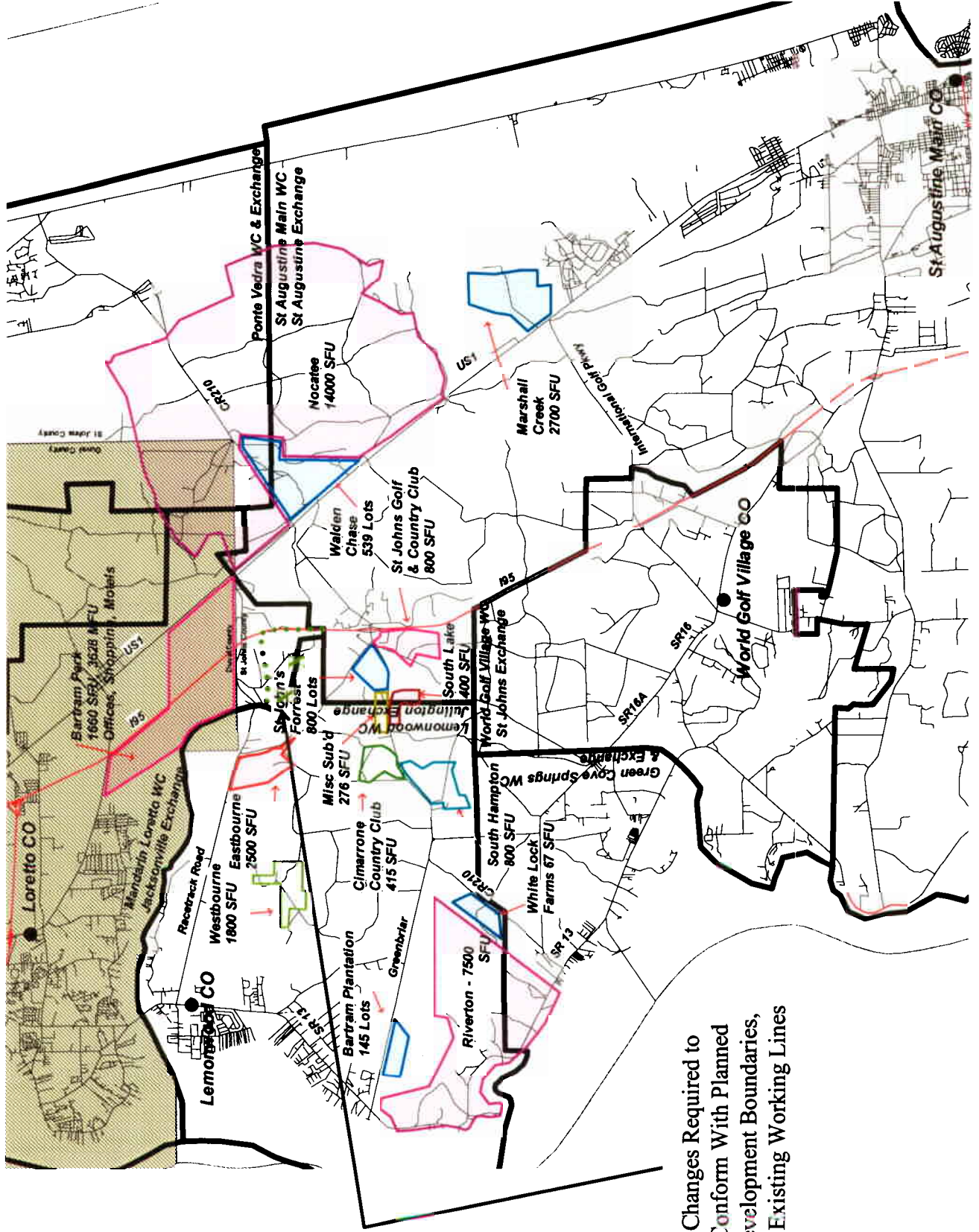
Boundary at  
Intracoastal

**ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT  
PHASE 2 DETAIL**



New Boundary  
Between Lemonwood  
And Green Cove Springs  
Wire Centers, No  
Working Lines

**ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT  
PHASE 3 DETAIL**

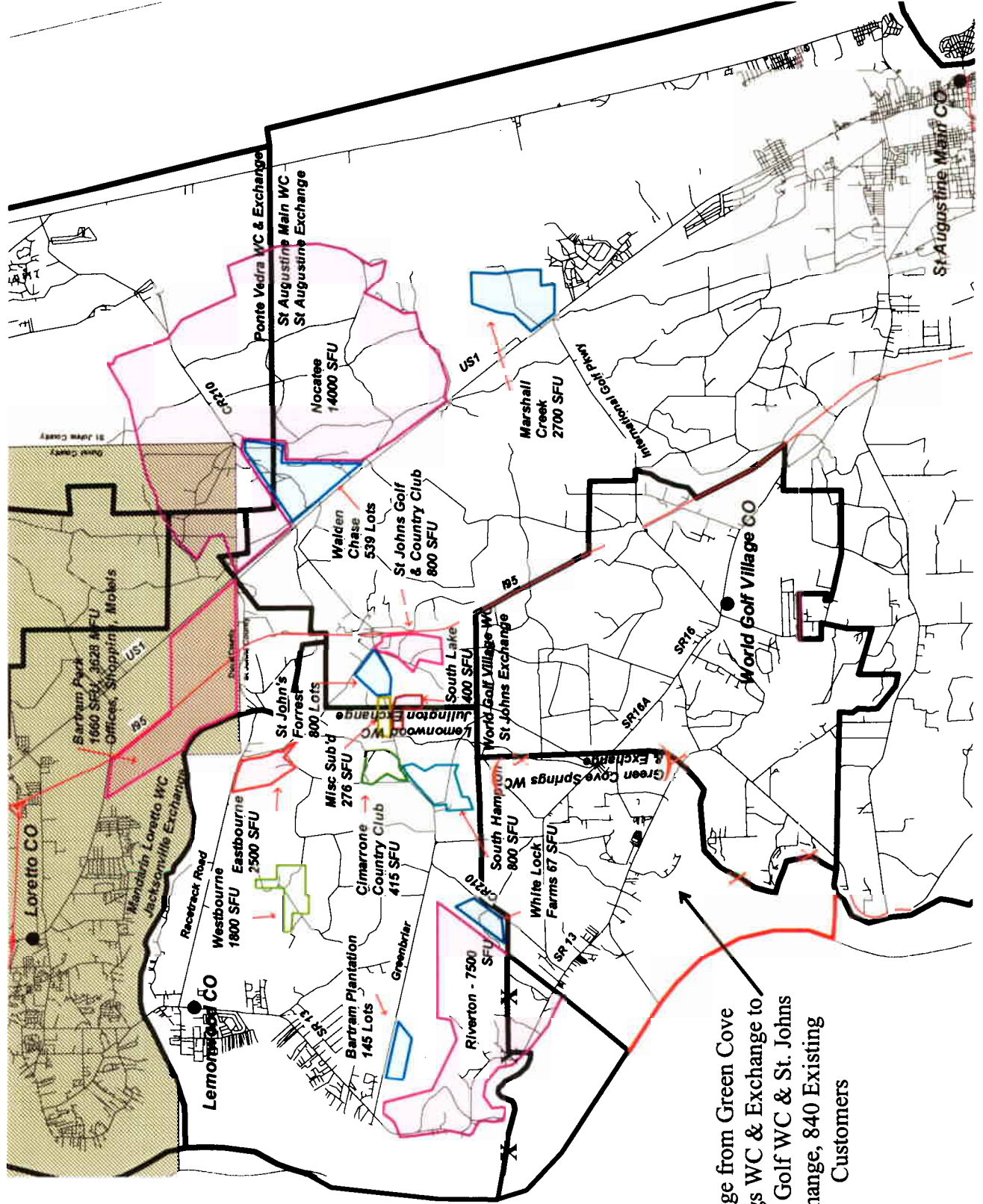


Changes Required to Conform With Planned Development Boundaries, 16 Existing Working Lines



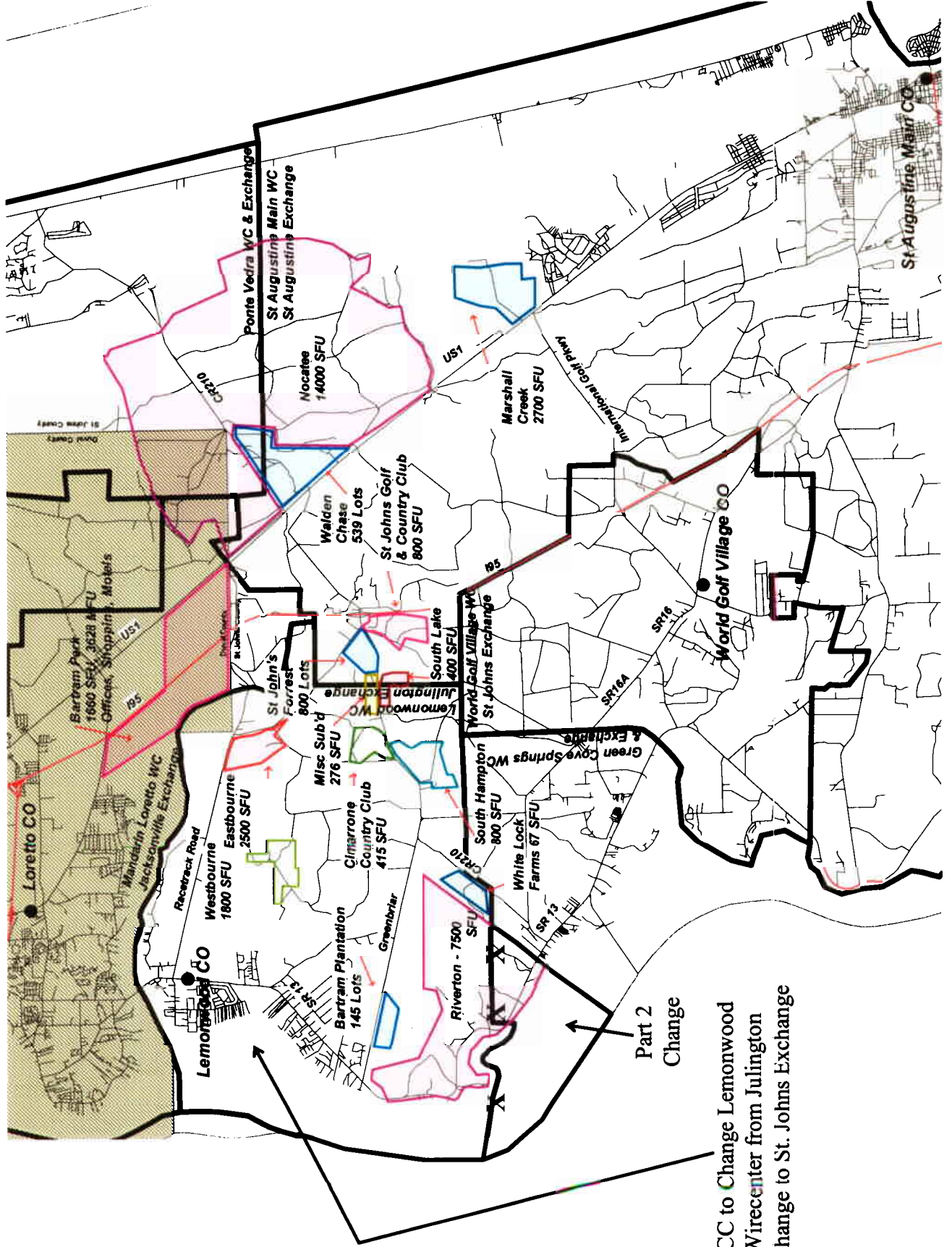
**ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT  
PHASE 4 DETAIL**

**Attachment F**



Change from Green Cove Springs WC & Exchange to World Golf WC & St. Johns Exchange, 840 Existing Customers

ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT  
PHASE 5 DETAIL



RCC to Change Lemonwood  
Wirecenter from Julington  
Exchange to St. Johns Exchange

Part 2  
Change

# ST. JOHNS EXCHANGE BOUNDARY REALIGNMENT FINAL BOUNDARIES

## Attachment H

