MICHAEL P. GOGGIN General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

April 21, 2000



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

## Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Stan L. Greer, which we ask that you file in the captioned dockets.

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, Michael P. Goggm (Bo)

Michael P. Goggin

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

RR WAW OPH

RECEIVED & FILED

-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

## CERTIFICATE OF SERVICE Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

U.S. Mail this 21<sup>st</sup> day of April, 2000 to the following:

Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 Tel. No. (850) 413-6212 Fax No. (850) 413-6250

Richard H. Brashear ALLTEL Florida, Inc. 206 White Avenue, S.E. Live Oak, Florida 32060-3357 Tel. No. (904) 364-2517 Fax No. (904) 362-4950

Gwen Azama-Edwards City of Daytona Beach Post Office Box 2451 Daytona Beach, Florida 32115-2451 Tel. No. (904) 258-3168

Comm. Wayne Gardner City of Deltona Post Office Box 5550 Deltona, Florida 32728-5550

Michael A. Gross Florida Cable Telecomm. Assoc., Inc. 310 N. Monroe Street Tallahassee, Florida 32301 Tel. No. (850) 681-1990 Fax No. (850) 681-9676

Angela Green, General Counsel Florida Public Telecomm. Assoc. 125 South Gadsden Street Suite 200 Tallahassee, FL 32301-1525 Tel. No. (850) 222-5050 Fax No. (850) 222-1355 Bruce May Holland Law Firm Post Office Drawer 810 Tallahassee, FL 32302 Tel. No. (850) 224-7000 Fax No. (850) 222-8185

Deborah L. Nobles Northeast Fla. Tel. Co., Inc. Post Office Box 485 Macclenny, Florida 32063-0485 Tel. No. (904) 259-0639 Fax No. (904) 259-7722

F. B. (Ben) Poag Sprint-Florida, Inc. P.O Box 2214 (MC FLTLHO0107) Tallahassee, Florida 32316-2214 Tel. No. (850) 599-1027 Fax No. (407) 814-5700

Robert M. Weiss Volusia County 123 W. Indiana Ave. Room #205 DeLand, Florida 32720 Tel. No. (904) 822-5750 Fax No. (904) 822-5795

Carole Joy Barice, Esq. James A. Fowler, Esq. Fowler, Barice, Feeney & O'Quinn, P.A. 28 West Central Blvd. Orlando, FL 32801 Tel. No. (407) 425-2684 Fritz Behring, City Manager City of Deltona P.O. Box 5550 800 Deltona Blvd. Deltona, FL 32728 Tel. No. (407) 860-7160

Charles J. Rehwinkel Susan Masterton Sprint-Florida, Inc. P.O. Box 2214 Tallahassee, FL 32399-2214 MC FLTLHO0107 Tel. No. (850) 847-0244

Joe Assenzo Sprint PCS Legal Department 49000 Main Street, 11th Floor Kansas City, Missouri 64112 Tel. No. (816) 559-1000

Cheryl A. Tritt Kimberly D. Wheeler Morrison & Foerster, LLP 2000 Pennsylvania Avenue, N.W. Suite 5500 Washington, D.C. 20006 Tel. No. (202) 887-1500 Counsel for Lockheed Martin IMS

Harriet Eudy ALLTEL Florida, Inc. Post Office Box 550 Live Oak, Florida 32060

J. Jeffry Wahlen Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302 Tel. No. (850) 425-5471 Fax No. (850) 222-7560 Counsel for ALLTEL Florida Peter M. Dunbar, Esq. Karen M. Camechis, Esq. Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. Post Office Box 10095 Tallahassee, FL 32302 Tel. No. (850) 222-3533 Fax No. (850) 222-2126

Carolyn Marek Vice President of Regulatory Affairs Southeast Region Time Warner Communications 233 Bramerton Court Franklin, TN 37069 Tel. No. (615) 376-6404 Fax No. (615) 376-6405

Floyd R. Self, Esq. Messer, Caparello & Self, P.A. 215 South Monroe Street Suite 701 Tallahassee, FL 32301-1876 Tel. No. (850) 222-0720 Fax No. (850) 224-4359 E-Mail: <u>fself@lawfla.com</u>

Tracy Hatch, Esq. Marshal Rule, Esq. AT&T Communications of the Southern States, Inc. 101 N. Monroe Street, Suite 700 Tallahassee, FL 32301 Tel. No. (850) 425-6364 Fax No. (850) 425-6361

C. Lee Fordham Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 Kenneth Hoffman Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 Tel. No. (850) 681-6788 Fax No. (850) 681-6515 Attys. for Omnipoint Communications

Donna Clemons Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Kimberly D. Wheeler Morrison & Foerster Law Firm 2000 Pennsylvania Avenue, NW Washington, DC 20006 Tel. No. (202) 887-1500 Fax No. (202) 887-0763 Attys. For Lockheed Martin IMS

D. Wayne Milby Lockheed Martin IMS Communications Industry Services 1133 15<sup>th</sup> Street, N.W. Washington, DC 20005 Tel. No. (202) 756-5600

Gloria Johnson General Attorney BellSouth Cellular Corp. 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

Kimberly Caswell GTE Florida, Inc. Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110 Tel. No. (813) 483-2617 Donna Canzano McNulty MCI WorldCom, Inc. 325 John Knox Road The Atrium, Suite 105 Tailahassee, Florida 32303 Tel. No. (850) 422-1254 Fax No. (850) 422-2586

----

Brian Sulmonetti MCI WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, Georgia 30328 Tel. No. (770) 284-5493 Fax No. (770) 284-5488

Daniel H. Thompson Berger Davis & Singerman 215 S. Monroe Street – Suite 705 Tallahassee, Florida 32301 Tel. No. (850) 561-3010 Fax No. (850) 561-3013 Attorney for ADT

Tim Vaccaro Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Nancy B.

# ORIGINAL

1		BELLSOUTH TELECOMMUNICATIONS, INC.
2		REBUTTAL TESTIMONY OF STAN L. GREER
3		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4		DOCKET NOS. 990455-TP, 990456-TP, 990457-TP; 990517-TP
5		APRIL 21, 2000
6		
7	Q.	PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS AND
8		YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.
9		("BELLSOUTH").
10		
11	Α.	My name is Stan L. Greer. I am a Manager in the State Regulatory
12		Office located at 150 South Monroe Street, Suite 400, Tallahassee, FL
13		32302.
14		
15	Q.	PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
16		
17	Α.	I graduated from the University of Kentucky in 1986 with a Bachelor of
18		Science in Electrical Engineering. In January 1987, I accepted a
19		position with the Florida Public Service Commission as an Engineer I in
20		the Division of Communications. In December 1995, I became the
21		Supervisor for the Division of Communication's Carrier Services
22		Section. During my tenure with the Commission, I acted as the
23		Chairman for the NARUC Subcommittee on Technology and
24		coordinated numerous Commission proceedings that established the
25		basis for many of the Commission's current policies associated with

-1-

DOCUMENT NUMBER-DATE 04981 APR 218 FPSC-RECORDS/REPORTING

.

1		certification, depreciation, alternative access vendors services,
2		implementation of state and federal statutes associated with
3		competition, and various mumbering issues. One of my main
4		responsibilities in the Division of Communications, as it relates to these
5		proceedings, was to develop and make recommendations on state and
6		federal numbering issues. In this capacity, I participated in the
7		development and implementation of numerous area code relief
8		proposals, acted as the Chairman of the Florida Number Portability
9		Steering Committee, and participated as a NARUC representative on
10		the North American Numbering Council.
11		
12		In April of 1998, I accepted my current position with BellSouth as a
13		Manager-Regulatory Relations. My main job responsibility in this
14		position is to act as an interface between BellSouth and the Florida
15		Public Service Commission on all issues before the Commission that
16		involve or may affect BellSouth Telecommunications, Inc.
17		
18	Q.	DID YOU FILE DIRECT TESTIMONY IN THIS DOCKET?
19		
20	Α.	No. I am adopting the Direct Testimony of Dan Baeza filed on behalf of
21		BellSouth in these dockets on November 17, 1999.
22		
23	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
24		TODAY?
25		

.

ġ.

-2-

1	Α.	The purpose of my rebuttal testimony is to address statements made
2		by various witnesses in their direct testimony and to address
3		statements and recommendations made by witnesses at the various
4		service hearings for the 305/786, 561, 904, and 954 NPAs.
5		
6	Q.	MCI WORLDCOM'S WITNESS, GREG DARNELL, ON PAGE SIX OF
7		HIS DIRECT TESTIMONY, STATES THAT THE FLORIDA PUBLIC
8		SERVICE COMMISSION (FPSC) CAN USE THE CONDITIONAL
9		AUTHORITY GRANTED TO IT BY THE FEDERAL
10		COMMUNICATIONS COMMISSION (FCC) TO ADDRESS
11		EXCESSIVE FOOTPRINT DEMAND. ONE OF THE MECHANISMS
12		HE IDENTIFIES IS RATE CENTER CONSOLIDATION. DID THE FCC
13		GRANT THE FPSC AUTHORITY TO IMPLEMENT RATE CENTER
14		CONSOLIDATION (RCC)?
15		
16	А.	No, the FCC did not grant such authority. The FCC, however,
17		expressed its belief that the FPSC should consider RCC before
18		implementing number pooling. It recognized that it did not have the
19		authority to give the FPSC the ability to implement RCC.
20		
21	Q.	CAN YOU BRIEFLY EXPLAIN RCC?
22		
23	А.	Rate Center Consolidation is the function of aggregating multiple rate
24		centers (in BellSouth's territory rate centers are the same as
25		exchanges) into fewer rate centers.

•

1 Q. IN YOUR OPINION, DOES THE FPSC HAVE THE AUTHORITY TO 2 ORDER RCC?

3

<u>\_</u> -Α. 4 Although I am not an attorney, it is my understanding that the FPSC lacks authority to require companies who are subject to price regulation 5 6 to implement RCC. If the FPSC consolidated rate centers, as discussed in the Commission's working groups established in Docket 7 8 No. 981444-TP, it would have the same affect as requiring companies 9 to implement additional extended area service (EAS) and extended 10 calling service (ECS) routes. In numerous requests to the FPSC, the 11 Commission has recognized that it lacks such authority unless the price regulated companies are willing to voluntarily implement such offerings. 12 13 Q. IS BELLSOUTH WILLING TO IMPLEMENT RCC ON A VOLUNTARY 14 BASIS? 15 16 Α. 17 Yes. BellSouth is willing to implement RCC, provided the FPSC allows BellSouth to recover the cost of implementation and it is revenue 18 neutral. 19 20 ON PAGE 2 OF KELLY FAUL'S DIRECT TESTIMONY, MCI 21 Q. WORLDCOM'S WITNESS, SHE STATES THAT MCI WORLDCOM 22 **GENERALLY RECOMMENDS A GEOGRAPHIC SPLIT AS THE TYPE** 23 OF AREA CODE RELIEF SUPPORTED BY HER COMPANY. IS A 24 GEOGRAPHIC SPLIT THE ONLY COMPETITIVELY NEUTRAL CODE 25

-4-

### METHOD TO PERFORM NPA RELIEF?

2

1

3 A. Generally speaking, I agree that a split is competitively neutral. I also 4 believe, as stated in FCC Order No. 96-333, paragraphs 273-291, that an overlay is competitively neutral provided certain criteria is 5 implemented such as 10-digit dialing for all local calls. The 6 telecommunications industry in the state of Florida agreed (by 7 consensus) that an overlay would be the best method to relieve 8 upcoming NPA exhausts. As a member of that industry, BellSouth 9 supports that decision. BellSouth believes that anti-competitive 10 circumstances will not arise since an overlay will be implemented 11 pursuant to the FCC criteria and carriers will have access to telephone 12 numbers on an equal basis. 13

14

Q. ON PAGE 7 OF HARRIET EUDY'S DIRECT TESTIMONY, ALLTEL'S
WITNESS, SHE STATES THAT IF THE FPSC IMPLEMENTS THE
INDUSTRY RECOMMENDATION FOR THE 904 AREA CODE, THE
FPSC SHOULD IMPLEMENT 10-DIGIT DIALING ON ECS ROUTES.
DO YOU AGREE WITH HER PROPOSAL?

20

A. No. If the FPSC implements the industry overlay recommendation, I
believe it should require the companies to implement 1+10 digit dialing
on ECS routes with competition instead of 10-digit dialing unless there
are some technical limitations. BellSouth believes implementation of
this dialing pattern is consistent with the dialing parity requirements of

-5-

1 the FCC.

2

.

.

-		
3	Q.	IN MCI WORLDCOM WITNESS KELLY FAUL, AT PAGE 11, VOLUSIA
4		COUNTY WITNESS ROBERT WEISS, AT PAGE4, AT&T WITNESS
5		RICHARD GUEPE, AT PAGE 5 AND 6, NORTHEAST FLORIDA
6		WITNESS DEBORAH NOBLES, AT PAGE 5, AND ALLTEL WITNESS
7		HARRIET EUDY'S DIRECT TESTIMONY, AT PAGE 7, THE
8		WITNESSES IDENTIFIED SPECIFIC DIALING PATTERNS FOR
9		VARIOUS TYPE OF CALLS WITHIN EACH AREA CODE THAT THEY
10		BELIEVE SHOULD BE IMPLEMENTED ALONG WITH THE
11		IMPLEMENTATION OF A GEOGRAPHIC SPLIT NPA RELIEF
12		ARRANGEMENT. DO YOU AGREE WITH THEIR PROPOSALS?
13		
14	Α.	No. The dialing patterns proposed by these witnesses appear to be
15		inconsistent with the dialing patterns the FPSC has implemented in
16		various other geographic split NPA relief plans. Listed below are the
17		typical dialing patterns ordered by the FPSC in other area code relief

18 proceedings:

19	<u> </u>	•		
20			Type of Pla	an
21	Type of Call	Within Geographic	Within	Between Area Codes*
22	۱ ــــــــــــــــــــــــــــــــــــ	Area Code	Overlay	· · · · · · · · · · · · · · · · · · ·
23	Local/EAS	7	10	10
24	ECS without IXC	7	10	10
25	Competition			

0			
0			
overlay			
FOF-TL			
ing			
nclear as			
to what dialing pattern the FPSC believes the companies should			
nich are			
between area codes. As discussed above, BellSouth believes the			
Commission should require all calling routes that are ECS with IXC			
echnically			
feasible. Although the previous Commission orders have not been			
clear, BellSouth believes the Commission's intent was to require 1+10			
atterns			
ng			
SKI'S			
DATE			
RAIE			
•			

-7-

1		CONSISTANT WITH THE NATIONAL FILL RATE FOR INCUMBENTS
2		LECS?
3		
4	Α.	No. As provided in response to staff's utilization data request,
5		BellSouth's fill rate for all of its area codes is in the range of 75% to
6		88%.
7		
8	Q.	IN SEVERAL PAGES OF THOMAS FOLEY'S DIRECT TESTIMONY,
9		NANPA WITNESS, AND AT THE VARIOUS SERVICE HEARINGS,
10		MR. FOLEY PRESENTED THE ALTERNATIVES BEING
11		CONSIDERED FOR EACH AREA CODE RELIEF. DID THE
12		INDUSTRY CONSIDER ALL OF THE RELIEF PROPOSALS
13		PRESENTED BY MR. FOLEY AT THE SERVICE HEARINGS?
14		
15	Α.	No. As pointed out by Mr. Foley at the service hearings, neither
16		NANPA nor the industry reviewed or evaluated the various relief plans
17		developed by Staff since the plans were not available to the industry
18		prior to the service hearings.
19		
20	Q.	DOES BELLSOUTH HAVE ANY INFORMATION AS TO HOW THE
21		EXHAUST DATES WERE DETERMINED FOR THE VARIOUS RELIEF
22		PLANS DEVELOPED BY STAFF?
23		
24	Α.	It is my understanding that the staff modified the type of data attached
25		to Mr. Foley's testimony to address the specifics associated with each

٠

×

-8-

relief plan. It should be noted that at the April 6, 2000 Staff Workshop,
 Staff indicated it would develop a description of how the exhaust dates
 were developed and place them on the Commission's web site the
 following week. To date, that information has not been placed on the
 web site.

6

7 Q. DOES BELLSOUTH HAVE ANY INFORMATION AS TO WHAT
8 NUMBER CONSERVATION MEASURES THE STAFF CONSIDERED
9 WHEN DETERMINING SOME OF THE EXHAUST DATES FOR THE
10 STAFF DEVELOPED PLANS?

11

Α. It is my understanding that staff did not consider any specific number 12 13 conservation measures when determining the exhaust dates for the relief plans that indicate an extended life due to conservation 14 measures. The plans merely used NANPA's Assumption No. 2. 15 16 identified at the industry jeopardy meeting that the request for codes 17 from carriers needing number resources would decrease 50%. The decrease could be due to a decrease in code requests or even 18 implementation of some form of number conservation measure. 19 20 AS EXPRESSED BY THE PUBLIC WITNESSES AT THE SERVICE 21 Q.

HEARINGS, THE BIGGEST CONCERN WITH THE INDUSTRY'S
OVERLAY PROPOSALS IS THE REQUIREMENT TO IMPLEMENT
10-DIGIT DIALING FOR ALL LOCAL CALLS. FOR THE 954 AREA
CODE, WOULD THERE BE CONSIDERABLE 10-DIGIT DIALING

-9-

1		REQUIRED IF A SPLIT RELIEF WAS IMPLEMENTED?
2		
3	A.	Yes. As shown on Exhibit SLG-1, all 954 relief plans currently being
4		considered by the FPSC would require implementation of considerable
5		10-digit dialing for local calls.
6		
7	Q.	THE PUBLIC WITNESSES AT THE 954 AREA CODE SERVICE
8		HEARINGS WERE IN FAVOR OF A SPLIT. WHAT WOULD BE THE
9		IMPACT ON CUSTOMERS IF THE COMMISSION IMPLEMENTED A
10		SPLIT IN THE 954 AREA CODE?
11		
12	Α.	The 954 area code consists of five exchanges, all of which are located
13		within Broward County. As with any area code relief, the major impacts
14		to customers are the dialing patterns and number changes. Today, the
15		current dialing patterns implemented in the 954 area code are as
16		follows:
17		
18		<ul> <li>IntraNPA local (including EAS) dialing - 7-digits</li> </ul>
19		<ul> <li>InterNPA local (including EAS) dialing – 10-digits (except</li> </ul>
20		between the 954 and 561 area codes which is dialed on a 7-digit
21		basis)
22		<ul> <li>ECS (all routes available to competition) dialing – 1+10 digit</li> </ul>
23		
24		Due to the small geographic nature of the 954 area code, these dialing
25		patterns have created confusion for customers on the correct dialing

٠

ø

-10-

1 pattern for a specific call location, as well as routing problems when the 2 appropriate dialing patterns are not followed. In most cases when the 3 customer misdials a call, the customer will hear a recording to please 4 hang up and dial again. However, in the 954 area code there are 5 numerous instances where the misdial by the customer will have a 6 route that is valid within the routing tables. For example, if a customer in Coral Springs wants to dial someone in Boca Raton, which is a 7-7 digit dialed EAS call, and they dial 10 digits, the customer will be routed 8 to the 561 NXX in Ft. Lauderdale since in most cases interNPA is either 9 10 or 1+10 digits. If the FPSC requires the implementation of a split in 10 the 954 area code, BellSouth will have no option but to implement a 11 12 dialing delay of 4-6 seconds for most, if not all, switches in the 954 area code. This delay would allow for the customer to complete their dialing 13 before the switch began to route the call. 14

15

As with any geographic split, approximately half of the customers would be required to change their area code. Although this type of change generally has little impact on a residential customer, business customers usually have strong recognition with their full 10-digit telephone number. In the past, businesses have been concerned with the impact of having to change their telephone numbers.

22

BellSouth also believes implementation of any of the geographic split
 plans would divide a major local calling scope within Broward County
 and not provide any clear dividing line for the two area codes.

-11-

1		Therefore, BellSouth would continue to support Alternative 1 –
2		Distributed Overlay – for Broward County (954 NPA).
3		
4	Q.	DID THE CUSTOMERS IN THE 561 SERVICE HEARINGS HAVE
5		SIMILAR CONCERNS AS THE CUSTOMERS IN THE 954 SERVICE
6		HEARINGS?
7		
8	Α.	Yes. As discussed above, the customers in the 561 service hearing
9		expressed the same concern with having to dial 10-digits for all local
10		calls if the Commission implemented the industry proposed overlay.
11		
1 <b>2</b>		The 561 area code consists of 15 exchanges that span four counties.
13		As shown on Exhibit SLG-1, any split plan implemented in the 561 area
14		code by the FPSC will require the implementation of numerous 10-digit
15		dialed local routes. Although, BellSouth does not believe the 561 area
16		code relief plans proposed exhibit the same technical problems as do
17		the 954 geographic split plans, BellSouth still supports Alternative 1, a
18		Distributed Overlay, for the 561 area code for five main reasons:
19		
20		1. The impact to business customers;
21		2. The reduction of customer confusion associated with multiple
22		dialing patterns;
23		3. The inability to identify a split which would provide an
24		appropriate relief;
25		4. The violation of industry guidelines by other options; and

\*

.

1		5. The necessity to implement numerous 10-digit dialed routes for
2		any given split plan.
3		
4	Q.	IN THE 305/786 SERVICE HEARINGS, THE PUBLIC WITNESSES
5		EXPRESSED CONCERN WITH THE IMPLEMENTATION OF AN
6		OVERLAY IN THE KEYS AREA AND RECOMMENDED THE FPSC
7		IMPLEMENT RCC AND NUMBER POOLING. DOES THE
8		COMMISSION HAVE THE AUTHORITY TO IMPLEMENT EITHER OF
9		THESE NUMBER CONSERVATION MEASURES IN THE KEYS?
10		
11	Α.	Although I am not an attorney, I do not believe the FPSC has the ability
12		to implement either number conservation measure in the Keys. As
13		discussed above, the Florida Statutes appear to limit the
14		implementation of RCC for a price regulated company. As for number
15		pooling, the authority delegated to the FPSC by the FCC only grants
16		the Commission the authority to implement pooling within an
17		Metropolitan Statistical Area (MSA). Since the Florida Keys are not
18		within an MSA, I do not believe the FPSC has the authority to require
19		carriers to implement number pooling in the Keys.
20		
21	Q.	IN THE 305/786 SERVICE HEARINGS, THE PUBLIC WITNESSES
22		EXPRESSED THEIR CONCERN WITH THE IMPLEMENTATION OF
23		AN OVERLAY FOR THE KEYS AND BELIEVED THE FPSC SHOULD
24		IMPLEMENT A RELIEF PLAN THAT RETAINS 7-DIGIT DIALING. DO
25		ANY OF THE RELIEF PLANS PROVIDE AN APPROPRIATE RELIEF

.

ø

-13-

## PLAN AND RETAIN 7-DIGIT DIALING FOR LOCAL CALLS?

2

1

3 Α. No. The emphasis, however, should be on an appropriate relief plan. As discussed by the witnesses at the service hearing, the Keys main 4 source of revenue is derived from the tourist industry. Generally, 5 businesses tied to the tourist industry rely heavily on their telephone 6 7 number for survival. Out of the 13 relief plans, all but Alternatives 1, 2, and 12, some form of overlay relief plan, would require the customers 8 9 in the Keys to change their area code. If the FPSC approved 10 Alternatives 8, 9, 10, and 13, geographic splits that use numbers from 11 an area code other than 305, customers would not only have to change their area code but also would require an entire 10-digit 12 telephone number, due to code conflicts in the other area codes that 13 14 would provide relief to the Keys. As pointed out in the earlier discussions, the impact to business customers is considerable greater 15 than they are to residential customers. 16

17

In addition to the adverse impact to businesses, the implementation of
Alternatives 5 and 6, geographic splits with a difference in the
forecasted life of greater than 15 years, would violate the industry
guidelines. BellSouth also believe that Alternative 7, a split and double
expanded overlay, would be extremely confusing for consumers in
Dade County and the adverse impact of in Dade County would offset
the benefit realized in the Keys.

1 Therefore, BellSouth still believes an overlay is the best relief 2 alternative to implement in the Keys. Alternative 12, which is the expanded overlay, simply-makes the most sense. 3 4 Q. DID THE CUSTOMERS IN THE 904 SERVICE HEARINGS HAVE THE 5 SAME CONCERNS AS CUSTOMERS IN THE OTHER SERVICE 6 HEARINGS? 7 8 9 Α. Yes. As pointed in earlier discussions, the customers in the 904 service hearings expressed the same concern with implementation of 10 11 the 10-digit local dialing that is associated with an overlay. As shown 12 on Exhibit SLG-1, any of the split proposals would require implementation of 10-digit dialing on numerous local routes. Although, 13 BellSouth generally believes customer confusion associated with an 14 15 overlay is less and business customers are better off if an overlay is implemented, the geographic size of the 904 area code lends itself to 16 implementation of some type of split proposal. 17 18 If the FPSC believed a geographic split was appropriate, BellSouth 19 20 would propose the Commission implement Alternative 6, a geographic split that encompasses Nassau, Duval, Clay and St. Johns counties in 21

- this proposal appears to retain together the areas that expressed a
  strong community of interest.
- 25

22

-15-

a single area code. Based on the testimony at the service hearings,

Q. IN THE 904 SERVICE HEARINGS, THE VOLUSIA COUNTY
 CONTINGENCY PROPOSED TO MOVE THE DEBARY EXCHANGE
 AND OSTEEN FROM THE 407 AREA CODE INTO THE AREA CODE
 FOR THE REST OF VOLUSIA COUNTY. WHAT ARE BELLSOUTH'S
 CONCERNS WITH VOLUSIA COUNTY'S PROPOSAL?

6

A. BellSouth would agree to move the DeBary exchange to the Volusia
County area code, provided that is what the customers want. The
FPSC should be aware that, depending on how the Commission
provides relief to the 904 area code, there could be some code conflicts
with the NXXs assigned in the DeBary exchange. If that is the case,
then the customers in DeBary would need to make a full 10-digit
number change.

14

The Commission is well aware that BellSouth and Sprint worked with 15 the Volusia County government to develop a proposal for the Osteen 16 area in an attempt to position the area to join a Volusia County area 17 code. The Commission required BellSouth to ballot the customers in 18 the affected area. The ballot for moving the Osteen area failed for lack 19 of response to the ballot. BellSouth has no reason to believe that a 20 second ballot would pass based on the last bailot results and the fact 21 22 that the customers in the Osteen area would have to make a full number change. BellSouth does not believe it is appropriate for the 23 FPSC to require BellSouth to ballot these customers again. Sprint and 24 BellSouth did everything possible, including a offer to implement EAS 25

-16-

1 between Osteen and Orange City, to assist the county in their efforts. 2 However, given all of the efforts of Volusia County, Sprint and BellSouth, the ballot failed. 3 4 Q. ON PAGE 3 OF VOLUSIA COUNTY COMMISSIONER WAYNE 5 GARDNER'S DIRECT TESTIMONY, THE COMMISSIONER STATES 6 THAT HE WOULD LIKE TO SEE ESSENTIALLY COUNTY-WIDE 7 CALLING. DOES THE FPSC HAVE AUTHORITY TO IMPLEMENT 8 9 COUNTY-WIDE CALLING? 10 11 Α. Considering the FPSC's recognition of the extent of its jurisdiction over 12 such activity, BellSouth does not believe the Commission has any authority to require price regulated companies to implement expanded 13 calling unless the company agrees to do so. 14 15 Q. SEVERAL WITNESSES STATED THAT THE COMMISSION SHOULD 16 17 IMPLEMENT THE APPROVED AREA CODE RELIEF AS SOON AS POSSIBLE. DO YOU AGREE WITH THIS PROPOSAL? 18 19 20 Α. Due to the number of area code reliefs being considered in the consolidated hearing and the uncertainty of the potential impact of any 21 22 number conservation measure implemented in the various area codes, 23 BellSouth recommends that the FPSC coordinate with the Industry and 24 NANPA when establishing the permissive and mandatory dialing periods. There are limitations on how many NPAs can be converted at once. 25

1		BellSouth believes it may be beneficial to establish an implementation
2		meeting in the future to set the specific permissive and mandatory
3		dialing periods once the imminent exhaust is determined.
4		-
5	Q.	DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
6		
7	А.	Yes.
8		
9		
10		
11		
12		
13		
14		
15		
16	206475	
17		
18		
1 <del>9</del>		
20		
21		
22		
23		
24		
25		

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 1 of 18

954 Area Code

4

.

954 Area Cod		
Alternative BellSouth Local Routes that should g		
	From 7 to 10 digit Dialing	
Alternative 1	Ft. Lauderdale to Ft. Lauderdale	
	Ft. Lauderdale to Coral Springs	
	Ft. Lauderdale to Deerfield Beach	
	Ft. Lauderdale to Pompano Beach	
	Ft. Lauderdale to Hollywood	
	Hollywood to Hollywood	
	Coral Springs to Boca Raton	
	Coral Springs to Deerfield Beach	
	Coral Springs to Ft. Lauderdale	
	Coral Springs to Deerfield Beach	
	Coral Springs to Pompano Beach	
	Deerfield Beach to Boca Raton	
	Deerfield Beach to Delray Beach	
	Deerfield Beach to Ft. Lauderdale	
	Deerfield Beach to Pompano Beach	
	Hollywood to North Dade	
	Pompano Beach to Boca Raton	
	Coral Springs to Coral Springs	
	Deerfield Beach to Deerfield Beach	
	Pompano Beach to Pompano Beach	
Alternative 2	East Ft. Lauderdale to West Ft. Lauderdale	
	East Ft. Lauderdale to Hollywood	
	Deerfield Beach to West Ft. Lauderdale	
	Coral Springs to West Ft. Lauderdale	
	Pompano Beach to West Ft. Lauderdale	
Alternative 3	Ft. Lauderdale to Ft. Lauderdale	
	Ft. Lauderdale to Coral Springs	
	Ft. Lauderdale to Deerfield Beach	
	Ft. Lauderdale to Pompano Beach	
1	Ft. Lauderdale to Hollywood	
	Hollywood to Hollywood	
	Coral Spring to Boca Raton Deerfield Beach to Boca Raton	
	Deerfield Beach to Delray Beach	
	Pompano Beach to Boca Raton	
Alternative 4	Ft. Lauderdale to Coral Springs	
Alternative 4	Ft. Lauderdale to Deerfield Beach	
	Ft. Lauderdale to Pompano Beach	
	Ft. Lauderdale to Hollywood	
	Coral Spring to Boca Raton	
	Deerfield Beach to Boca Raton	
[	Deerfield Beach to Delray Beach	
	Pompano Beach to Boca Raton	

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 2 of 18

561 Area Code

	-**
Alternative	BeilSouth Local Routes that should go
	From 7 to 10 digit Dialing
Alternative 1	Belle Glade to Pahokee
	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Delray Beach
	Boynton Beach to Delray Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Ft. Pierce to Port St. Lucie
	Hobe Sound to Jensen Beach
	Hobe Sound to Jupiter Hobe Sound to Port St. Lucie
	Hobe Sound to Stuart
	Jensen Beach to Port St. Lucie
	Jensen Beach to Stuart
	Jupiter to West Palm Beach
	Port St. Lucie to Stuart
	Sebastian to Melbounre
	Sebastian to Vero Beach
	Stuart to Indiantown
	Belle Glade to Belle Glade
	Sebastian to Sebastian
	Vero Beach to Vero Beach
	Ft. Pierce to Ft. Pierce
	Port St. Lucie to Port St. Lucie
1	Jensen Beach to Jensen Beach
	Stuart to Stuart
	Indiantown to Indiantown
	Hobe Sound to Hobe Sound
	Jupiter to Jupiter
	Pahokee to Pahokee
	Boynton Beach to Boynton Beach
	Deiray Beach to Deiray Beach
	Boca Raton to Boca Raton
	West Palm Beach to West Palm Beach
Alternative 2	Boca Raton to Coral Springs
Alternative 2	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
1	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
1	Hobe Sound to Jensen Beach
ļ	Hobe Sound to Port St. Lucie
	Jensen Beach to Stuart
	Port St. Lucie to Stuart
1	Sebastian to Melbourne
	Scodstrail to Meroodille

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 3 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Stuart to Indiantown
Alternative 3	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Delray Beach
	Delray Beach to Deerfield Beach
	Jupiter to West Palm Beach
	Sebastian to Melbourne
Alternative 4	Boca Raton to Coral Springs
Alternative 4	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Delray Beach to Deerfield Beach
	Hobe Sound to Jupiter
	Sebastian to Melbourne
Alternative 5	Belle Glade to Pahokee
	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Delray Beach
	Boynton Beach to Delrary Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Hobe Sound to Jupiter
	Jupiter to West Palm Beach
	Sebastian to Melbourne
	Beile Glade to Belle Glade
	Boca Raton to Boca Raton
	Delray Beach to Delray Beach
	Boynton Beach to Boynton Beach
	West Palm Beach to West Palm Beach
	Pahokee to Pahokee
	Jupiter to Jupiter
Alternative 6	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Deiray Beach
	Boynton Beach to Delrary Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Hobe Sound to Jupiter
	Jupiter to West Palm Beach
	Sebastian to Melbourne
	Boca Raton to Boca Raton
	Delray Beach to Delray Beach
	Boynton Beach to Boynton Beach
	West Palm Beach to West Palm Beach

٠

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 4 of 18

Alternative	BeilSouth Local Routes that should go
	From 7 to 10 digit Dialing
Alternative 7	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Jupiter to West Palm Beach
	Sebastian to Melbourne
Alternative 8	Belle Glade to Pahokee
Titotidayo o	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Delray Beach
	Boynton Beach to Delray Beach
	Boynton Beach to West Palm Beach Delray Beach to Deerfield Beach
	Ft. Pierce to Port St. Lucie
	Hobe Sound to Jensen Beach
	Hobe Sound to Jupiter
	Hobe Sound to Port St. Lucie
	Hobe Sound to Stuart
	Jensen Beach to Port St. Lucie
	Jensen Beach to Stuart
	Jupiter to West Palm Beach
	Port St. Lucie to Stuart
	Sebastian to Melbounre
	Sebastian to Vero Beach
	Stuart to Indiantown
	Belle Glade to Belle Glade
	Sebastian to Sebastian
	Vero Beach to Vero Beach
	Ft. Pierce to Ft. Pierce
	Port St. Lucie to Port St. Lucie
	Jensen Beach to Jensen Beach
	Stuart to Stuart
	Indiantown to Indiantown
	Hobe Sound to Hobe Sound
	Jupiter to Jupiter
	Pahokee to Pahokee
	Boynton Beach to Boynton Beach
	Deiray Beach to Deiray Beach
	Boca Raton to Boca Raton
Alternative 9	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Sebastian to Melbourne

٠

يعي.

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 5 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Stuart to Indiantown
	Port St. Lucie to Ft. Pierce
Alternative 10	Belle Glade to Pahokee
	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Deiray Beach
	Boynton Beach to Delray Beach
	Delray Beach to Deerfield Beach
	Ft. Pierce to Port St. Lucie
	Hobe Sound to Jensen Beach
	Hobe Sound to Jupiter Hobe Sound to Port St. Lucie
	Hobe Sound to Fort St. Lucie
	Jensen Beach to Port St. Lucie
	Jensen Beach to Stuart
	Port St. Lucie to Stuart
	Sebastian to Melbounre
	Sebastian to Vero Beach
	Stuart to Indiantown
	Belle Glade to Belle Glade
	Sebastian to Sebastian
	Vero Beach to Vero Beach
	Ft. Pierce to Ft. Pierce
	Port St. Lucie to Port St. Lucie
	Jensen Beach to Jensen Beach
	Stuart to Stuart
	Indiantown to Indiantown
	Hobe Sound to Hobe Sound
	Pahokee to Pahokee
	Delray Beach to Delray Beach
	Boca Raton to Boca Raton
Alternative 11	Belle Glade to Pahokee
Alternative 11	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boca Raton to Delray Beach
	Boynton Beach to Delray Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Ft. Pierce to Port St. Lucie
	Hobe Sound to Jensen Beach
	Hobe Sound to Jupiter
	Hobe Sound to Port St. Lucie
	Hobe Sound to Stuart
	Jensen Beach to Port St. Lucie
	Jensen Beach to Stuart

٠

يعي.

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 6 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Jupiter to West Palm Beach
	Port St. Lucie to Stuart
	Sebastian to Melbounre
	Sebastian to Vero Beach
	Stuart to Indiantown
	Belle Glade to Belle Glade
	Sebastian to Sebastian
	Vero Beach to Vero Beach
	Ft. Pierce to Ft. Pierce
	Port St. Lucie to Port St. Lucie
	Jensen Beach to Jensen Beach
	Stuart to Stuart
	Indiantown to Indiantown
	Hobe Sound to Hobe Sound
	Jupiter to Jupiter
	Pahokee to Pahokee
	Boynton Beach to Boynton Beach
	Delray Beach to Delray Beach
	Boca Raton to Boca Raton
	West Palm Beach to West Palm Beach
Alternative 12	Boca Raton to Coral Springs
	Boca Raton to Deerfield Beach
	Boca Raton to Pompano Beach
	Boynton Beach to West Palm Beach
	Delray Beach to Deerfield Beach
	Sebastian to Melbourne
	Stuart to Indiantown
	Port St. Lucie to Ft. Pierce

#### 305/786 Area Code

Alternative	BellSouth Local Routes that should go From 7 to 10 digit Dialing
Alternative 1	Big Pine Key to Key West Big Pine Key to Marathon Big Pine Key to Sugarloaf Key Islamorada to Key Largo Islamorada to Marathon Key Largo to North Key Largo Key West to Sugarloaf Key Big Pine Key to Big Pine Key Marathon to Marathon
	Key West to Key West Sugarloaf Key to Sugarloaf Key Key Largo to Key Largo

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 7 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	North Key Largo to North Key Largo
	Islamorada to Islamorada
Alternative 2	Big Pine Key to Key West
	Big Pine Key to Marathon
	Big Pine Key to Sugarloaf Key
	Islamorada to Key Largo
	Islamorada to Marathon
	Key Largo to North Key Largo
	Key West to Sugarloaf Key
	Big Pine Key to Big Pine Key
	Marathon to Marathon
	Key West to Key West
	Sugarloaf Key to Sugarloaf Key
	Key Largo to Key Largo
	North Key Largo to North Key Largo
	Islamorada to Islamorada
Alternative 3	None
Alternative 4	None
Alternative 5	None
Alternative 6	None
Alternative 7	None
Alternative 8	None
Alternative 9	None
Alternative 10	None
Alternative 11	None
Alternative 12	Big Pine Key to Key West
	Big Pine Key to Marathon
	Big Pine Key to Sugarloaf Key
	Islamorada to Key Largo
	Islamorada to Marathon
	Key Largo to North Key Largo
	Key West to Sugarloaf Key
	Big Pine Key to Big Pine Key
	Marathon to Marathon
	Key West to Key West
	Sugarioaf Key to Sugarioaf Key
	Key Largo to Key Largo
	North Key Largo to North Key Largo
	Islamorada to Islamorada
Alternative 13	None

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 8 of 18

904 Area Code

- -

\*

Alternative	BellSouth Local Routes that should go
A 14	From 7 to 10 digit Dialing
Alternative 1	Baldwin to Jacksonville
	Baldwin to Maxville
	Bunnell to Flagler Beach
	Bunnell to Palm Coast
	DeLand to DeBary
	DeLand to DeLeon Springs
	DeLand to Orange City
	DeLand to Pierson
	DeLeon Springs to Orange City
	DeLeon Springs to Pierson
	Fernandina Beach to Yulee
	Flagler Beach to Palm Coast
	Green Cove Springs to Maxville
	Green Cove Springs to Middleburg
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Lake City to Branford
	Lake City to Fort White
	Lake City to Wilborn
	Lake City to White Springs
	Maxville to Middleburg
	Maxville to Orange Park
	Middleburg to Orange Park New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Florahome
	Palatka to Hastings
	Palatka to Interlachen
	Palatka to Pomona Park
	Palatka to Welaka

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 9 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Pierson to Crescent City
	Pomona Park to Crescent City
	Pomona Park to Welaka
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Welaka to Crescent City
	Yulee to Yulee
	Fernandina Beach to Fernandina Beach
	Jacksonville to Jacksonville
	Jacksonville Beach to Jacksonville Beach
	Lake City to Lake City
	Baldwin to Baldwin
	Maxville to Maxville
	Middleburg to Middleburg
	Orange Park to Orange Park
	Green Cove Springs to Green Cove Springs
	Julingotn to Julington Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Florahome to Florahome
	Palatka to Palatka
	Interlachen to Interlachen
	Welaka to Welaka
	Paim Coast to Paim Coast
	Flagier Beach to Flagier Beach
	Bunnell to Bunnell
	Pomona Park to Pomona Park
	Crescent City to Crescent City
	Pierson to Pierson
	Daytona Beach to Daytona Beach
	DeLeon Springs to DeLeon Springs
	DeLand to DeLand
	New Smyrna Beach to New Smyrna Beach
	Oak Hill to Oak Hill
Alternative 2	Baldwin to Jacksonville
Allemanye 2	Baldwin to Maxville
	DeLand to DeBary
	Fernandina Beach to Yulee
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Callahan
	Jacksonville to Lailanan Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 10 of 18

.

Alternative	BeilSouth Local Routes that should go From 7 to 10 digit Dialing
	-Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings St. Augustine to St. Johns
	St. Johns to Hastings Baldwin to Baldwin
	Julingotn to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
Alternative 3	Baldwin to Maxville
	DeLand to DeBary
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Julington to Orange Park
	Orange Park to St. Johns
	Palatka to Hastings
	St. Johns to Hastings
Alternative 4	Baldwin to Maxville
	DeLand to DeBary
	Green Cove Springs to Jacksonville
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
Alternative 5	Baldwin to Maxville
	DeLand to DeBary
	Green Cove Springs to Jacksonville
	Jacksonville to Julington
	Jacksonville to Maxville

٠

ž

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 11 of 18

Alternative	BellSouth Local Routes that should go From 7 to 10 digit Dialing
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
Alternative 6	
Alternative o	DeLand to DeBary
A. 1	Palatka to Hastings
Alternative 7	Baldwin to Maxville
	DeLand to DeBary
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Maxville to Orange Park
	Middleburg to Orange Park
	Palatka to Hastings
Alternative 8	Baldwin to Jacksonville
	Baldwin to Maxville
	DeLand to DeBary
	Fernandina Beach to Yulee
	Green Cove Springs to Maxville
	Green Cove Springs to Middleburg
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
· ·	Lake City to Branford
	Lake City to Fort White
	Lake City to Wilborn
	Lake City to White Springs
	Maxville to Middleburg
	Maxville to Orange Park

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 12 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Florahome
	Palatka to Hastings
	Palatka to Interlachen
	Palatka to Pomona Park
	Palatka to Welaka
	Pierson to Crescent City
	Pomona Park to Crescent City
	Pomona Park to Welaka
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Welaka to Crescent City
	Baldwin to Baldwin
	Maxville to Maxville
	Middleburg to Middleburg
	Orange Park to Orange Park
	Green Cove Springs to Green Cove Springs
	Julingom to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Florahome to Florahome
	Palatka to Palatka
	Interlachen to Interlachen
	Welaka to Welaka
	Pomona Park to Pomona Park
	Crescent City to Crescent City
Alternative 9	Baldwin to Jacksonville
	Bunnell to Flagler Beach
	Bunnell to Palm Coast
	DeLand to DeBary
	DeLand to Orange City
	DeLeon Springs to Orange City
	Fernandina Beach to Yulee
)	Flagler Beach to Palm Coast
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
1	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach

.

.

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 13 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Lake City to Branford
	Lake City to Fort White
	Lake City to Wilborn
	Lake City to White Springs
	New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Julingotn to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Daytona Beach to Daytona Beach
	New Smyrna Beach to New Smyrna Beach
	Oak Hill to Oak Hill
	Lake City to Lake City
Alternative 10	Baldwin to Jacksonville
1	Baldwin to Maxville
	DeLand to DeBary
	Fernandina Beach to Yulee
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
l	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
L	

.

.

-----

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 14 of 18

Alternative	BellSouth Local Routes that should go From 7 to 10 digit Dialing
	St. Augustine to Hastings
	St. Augustine to Hastings St. Augustine to St. Johns
	St. Johns to Hastings
	Baldwin to Baldwin
	Julingotn to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
4 14 + lana 1 1	Baldwin to Jacksonville
Alternative 11	
	Baldwin to Maxville
	Bunnell to Flagler Beach
	Bunnell to Palm Coast
	DeLand to DeBary
	Fernandina Beach to Yulee
	Flagler Beach to Palm Coast
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Maxville to Orange Park
	Middleburg to Orange Park
	New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Baldwin to Baldwin
	Orange Park to Orange Park
	Julingoth to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Palm Coast to Palm Coast

. .

٠

• 1

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 15 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing Flagler Beach to Flagler Beach
	Bunnell to Bunnell
	Daytona Beach to Daytona Beach
	New Smyrna Beach to New Smyrna Beach
A 14	Oak Hill to Oak Hill
Alternative 12	Baldwin to Jacksonville
	Baldwin to Maxville
	Bunnell to Flagler Beach
	Bunnell to Palm Coast
	DeLand to DeBary
	Fernandina Beach to Yulee
	Flagler Beach to Palm Coast
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Maxville to Orange Park
	Middleburg to Orange Park
	New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Baldwin to Baldwin
	Orange Park to Orange Park
	Julingoth to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Palm Coast to Palm Coast
	Flagler Beach to Flagler Beach
	Bunnell to Bunnell
	Daytona Beach to Daytona Beach

٠

. :

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 16 of 18

Alternative	BeilSouth Local Routes that should go
	From 7 to 10 digit Dialing
	New Smyrna Beach to New Smyrna Beach
	Oak Hill to Oak Hill
Alternative 13	Baldwin to Jacksonville
	Baldwin to Maxville
	Bunnell to Flagler Beach
	Bunnell to Palm Coast
	Fernandina Beach to Yulee
	Flagler Beach to Palm Coast
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Maxville to Orange Park
	Middleburg to Orange Park
	New Symma Beach to Oak Hill
	Orange Park to St. Johns
	Palatka to Hastings
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Baldwin to Baldwin
	Orange Park to Orange Park
	Julingotn to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
	Palm Coast to Palm Coast
	Flagler Beach to Flagler Beach
	Bunnell to Bunnell
	Daytona Beach to Daytona Beach
	New Smyrna Beach to New Smyrna Beach
	Oak Hill to Oak Hill
Alternative 14	Baldwin to Maxville
	DeLand to DeBary

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 17 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digit Dialing
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to St. Johns
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Pierson to Crescent City
	Ponte Vedra Beach to St. Johns
Alternative 15	Baldwin to Maxville
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to St. Johns
1 •	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Pierson to Crescent City
	Ponte Vedra Beach to St. Johns
Alternative 16a	Pierson to Crescent City
Alternative 16b	Baldwin to Jacksonville
	Baldwin to Maxville
	Fernandina Beach to Yulee
	Green Cove Springs to Maxville
	Green Cove Springs to Middleburg
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Callahan
	Jacksonville to Jacksonville Beach
	Jacksonville to Julington
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Jacksonville to Orange Park
	Jacksonville to Ponte Vedra Beach
	Jacksonville to St. Johns
•	Jacksonville to Yulee
	Jacksonville Beach to Ponte Verda Beach
	Jacksonville Beach to St. Johns
	Julington to Orange Park
	Julington to St. Johns
	Maxville to Middleburg
	Maxville to Orange Park

٠

٩,

Rebuttal Testimony of Stan Greer Exhibit SLG-1 FPSC Docket No. 990455-TP, 990456-TP, 990457-TP; 990517-TP April 21, 2000 Page 18 of 18

Alternative	BellSouth Local Routes that should go
	From 7 to 10 digir Dialing
	Middleburg to Orange Park
	Orange Park to St. Johns
	Ponte Vedra Beach to St. Johns
	St. Augustine to Hastings
	St. Augustine to St. Johns
	St. Johns to Hastings
	Baldwin to Baldwin
	Maxville to Maxville
	Middleburg to Middleburg
	Orange Park to Orange Park
	Green Cove Springs to Green Cove Springs
	Julingotn to Julington
	Ponte Verda Beach to Ponte Verda Beach
	St. Johns to St. Johns
	St. Augustine to St. Augustine
Alternative 17	Baldwin to Maxville
	DeLand to DeBary
	Fernandina Beach to Yulee
	Green Cove Springs to Maxville
	Green Cove Springs to Middleburg
	Green Cove Springs to Jacksonville
	Green Cove Springs to Julington
	Green Cove Springs to Orange Park
	Jacksonville to Maxville
	Jacksonville to Middleburg
	Maxville to Orange Park
	Middleburg to Orange Park
	St. Augustine to Hastings
	St. Johns to Hastings

Ŧ