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March 5, 2001

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. ~~000121-11~~ **010102-TP**

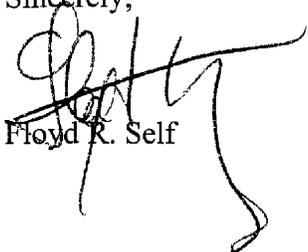
Dear Ms. Bayó:

Enclosed for filing on behalf AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. are an original and fifteen copies of the Rebuttal Testimony of Felicia Anne Henderson on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

FRS/amb
Enclosure

cc: Marsha Rule, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

02908 MAR-5 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Investigation of Proposed Updates to the)
Routing Data Base System (RDBS) and) Docket No. 010102-TP
Business Rating Input Database System)
(BRIDS) Affecting the Tampa)
Telecommunications Carriers)
_____)

REBUTTAL TESTIMONY OF FELICIA ANNE HENDERSON

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

AND

AT&T WIRELESS SERVICES

March 5, 2001

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.**

2 A. My name is Felicia Anne Henderson, and my business address is 1200
3 Peachtree Street, N.E., 6W09, Atlanta, Georgia 30309. I am employed as a
4 Numbering Resource and Project Manager in the Network Architecture and
5 Development organization.

6 **Q. ARE YOU THE SAME FELICIA ANNE HENDERSON WHO FILED**
7 **DIRECT TESTIMONY IN THE DOCKET?**

8 A. Yes, I am.

9 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10 A. The purpose of my testimony is to respond to the Direct Testimony of
11 Beverly Y. Menard representing Verizon Florida Inc. (“Verizon”).

12 **Q. WHAT ASSUMPTION DO YOU BELIEVE PERMEATES MS.**
13 **MENARD’S TESTIMONY?**

14 A. I understand that Ms. Menard believes that it is the right of Verizon to
15 determine the Rate Center structure under which all other carriers must
16 operate. She refers to existing Verizon tariffs, manual work-arounds existing
17 between her company and another incumbent carrier, and even refers to the
18 questionable five Rate Center structure as, “THE CORRECT TAMPA
19 RATE CENTERS” on page 13, lines 19 and 20, of her testimony.

20 **Q. DO YOU KNOW OF ANY STATE STATUTE OR REGULATION**
21 **THAT EITHER EMPOWERS THE INCUMBENT CARRIER WITH**
22 **SELF-DETERMINATION ON SETTING RATE CENTERS, OR**

1 **FORBIDS NEW ENTRANTS FROM OPERATING WITH A**
2 **DIFFERENT RATE CENTER STRUCTURE?**

3 A. I know of neither. While there are very good reasons for operating within
4 the same Rate Center structure, it was not my impression that a competitive
5 marketplace in Florida would require ALECs to conform to the Rate Center
6 structure that the incumbent alone could design.

7
8 Conversely, I believe that the structure of Rate Centers, much like the
9 stewardship of Numbering Resources, is held for public benefit. The Rate
10 Center structure should be designed for the optimum good of end user
11 customers.

12 **Q. DO YOU AGREE WITH MS. MENARD’S VIEW ON HOW LONG**
13 **THE FIVE RATE CENTERS THAT VERIZON TODAY**
14 **RECOGNIZES HAVE EXISTED?**

15 A. No. Regarding the possibility that the prospective five Rate Center structure
16 has been in place for more than the last few weeks, Ms. Menard says at page
17 3, line 4 and following, “we believe that they have existed for at least 30
18 years.” She bases this contention on the existence of extended area service
19 (“EAS”) routes, “between Tampa South and Palmetto in 1969 and Tampa
20 North and Zephyrhills in 1970.”

21

1 My understanding is mirrored in the testimony of Thomas C. Foley of
2 NeuStar, Inc. Mr. Foley says, at page 3, lines 8-14, of his direct:

3 I offer this testimony to explain NANPA's role in
4 determining the exhaust of the 813 NPA in response to a
5 letter from the Commission staff. The staff requested that I
6 file pre-filed direct testimony explaining the effects
7 **Verizon's proposal to create five LERG rate centers out**
8 **of the existing single Tampa rate center** will have on the
9 assignment of CO codes and on the projected exhaust date
10 of the 813 NPA. The 813 NPA is located in the Tampa,
11 Florida area.

12 There are two notable points. Mr. Foley uses the term "create" to describe
13 the effort put forth by Verizon. This is very different from the view that Ms.
14 Menard has of these Rate Centers having existed for years. Secondly, Mr.
15 Foley identifies himself with the North American Number Plan
16 Administrator ("NANPA") division of NeuStar, the division constituting the
17 only body contracted to perform Number Administration in the United
18 States.

19
20 Since the NANPA recognizes that Verizon is proposing to create Rate
21 Centers, and since NANPA apparently recognizes that only the "Tampa"

1 Rate Center exists (prior to the February 1, 2001 change), I cannot agree
2 with Ms. Menard's contention about Rate Center history.

3 **Q. DO YOU AGREE WITH THE DESCRIPTION MS. MENARD GIVES**
4 **OF WHAT THE "LERG" IS?**

5 A. In part. The Local Exchange Routing Guide ("LERG") is, as stated, a
6 document containing switch information. Beyond this, though, it also
7 contains a list of Rate Centers. In LERG 8, a subunit of the LERG, all
8 documented Rate Centers in the North American Numbering Plan ("NANP")
9 are listed. Under the Florida Rate Center "Tampa," there is no modifier or
10 identity with Verizon as owner or originator.

11
12 Additionally, and more importantly, telephone companies throughout the
13 country consider the LERG to be the definitive document regarding Rate
14 Center structure. GTE, the predecessor to Verizon, was among the carriers
15 that said in the context of Local Number Portability, for instance, that they
16 rely on the LERG to communicate information regarding network
17 capabilities and components. AT&T uses the LERG, much as Mr. Foley
18 appears to, as the reference point for fundamental network intelligence.

19 **Q. DO YOU BELIEVE THAT THE MANUAL WORK-AROUND**
20 **DESCRIBED BY MS. MENARD AT PAGE 4, LINES 8 AND**
21 **FOLLOWING SHOULD BE A MODEL OR FORERUNNER OF**
22 **HOW ALECs SHOULD OPERATE?**

1 A. No, I don't. It appears that Verizon was willing to use an intricate
2 manipulation of sub-LERG data to assign network parameters for an NXX.
3 With the LERG information having existed for years describing the solitary
4 Tampa Rate Center, this activity seems to suboptimize resources. Certainly,
5 this is not an approach that any ALEC would desire to replicate.

6
7 It is a reasonable outcome of this proceeding that the single Rate Center
8 structure would be maintained, and that if Verizon desired continuing some
9 sub-Rate Center structure that it has maintained in the work-around example
10 that it be allowed to do so, without compelling others to adopt this structure.

11 **Q. DO YOU AGREE THAT "HISTORICALLY, THE ALECS' NXXS**
12 **HAVE BEEN ESTABLISHED AS A TAMPA CENTRAL RATE**
13 **CENTER" AS STATED ON PAGE 4, LINE 21 AND FOLLOWING**
14 **OF MS. MENARD'S TESTIMONY?**

15 A. No. AT&T has never knowingly established anything other than the Tampa
16 Rate Center when acquiring an NXX in that area. If AT&T had desired to, it
17 would have been against all known procedures to establish a Rate Center that
18 was not represented in the LERG. I suspect other carriers' assignments were
19 similarly made to the Tampa Rate Center, based on several discussions with
20 other carriers on this subject.

1 **Q. WHAT DO YOU FIND CURIOUS ABOUT THE LIST OF CARRIERS**
2 **INVOLVED IN A “WORKING GROUP” AS DESCRIBED BY MS.**
3 **MENARD ON PAGE 6, LINE 3 AND FOLLOWING?**

4 A. The list of representatives working on the proposal by Verizon to change the
5 Rate Center structure in the LERG included four incumbent carriers, two
6 administrative/vendor units, one wireless unit, and only one ALEC. Any
7 conclusions reached by this body must be suspect at their very inception.

8 **Q. DO YOU AGREE WITH THE CHARACTERIZATION THAT**
9 **STAFF MEMBER LEVENT ILERI WAS MADE AWARE OF “THE**
10 **INDUSTRY EFFORT TO HARMONIZE THE LERG WITH GTE’S**
11 **TARIFFS” ON PAGE 6, LINE 8 AND FOLLOWING OF MS.**
12 **MENARD’S TESTIMONY?**

13 A. No, this characterization is misleading. As noted in the prior answer, this
14 group is dubiously labeled an “industry effort” due to the representation.
15 Furthermore, this group seems to have been gathered to make the LERG
16 Rate Center structure conform to the GTE (Verizon) tariffs. Use of the term
17 “harmonize” implies a constructive developing for the greater good. This
18 harmonizing was a solo performance for the good of GTE (Verizon).

19 **Q. DO YOU BELIEVE THE STAFF UNDERSTOOD THE**
20 **IMPLICATIONS OF THE RATE CENTER CHANGE PROPOSED**
21 **BY VERIZON?**

1 A. No. Despite having been told about the “industry effort” and Verizon’s
2 desire to resolve an acknowledged inconsistency between the LERG and the
3 local exchange tariffs, I don’t believe the implications were understood fully.
4 Rate Centers and the call rating processes involved in toll billing are not in
5 the mainstream of regulatory scrutiny. As noted in Ms. Menard’s testimony,
6 Staff has been engaged in discussions since the industry was first notified of
7 the proposal, but these discussions only make clear that not everyone knew
8 what was going on and that the impact on ALECs and their customers has
9 yet to be fully detailed before this Commission.

10 **Q. MUST ALECs “HAVE AN NXX FOR EACH VERIZON RATE**
11 **CENTER” AS NOTED BY MS. MENARD ON PAGE 7, LINE 16 AND**
12 **FOLLOWING?**

13 A. No. ALECs have operated with the existing single Rate Center continually
14 to the present time. There is no need for ALECs to acquire the multitude of
15 NXXs that Verizon is now suggesting are a requirement.

16 **Q. DO YOU BELIEVE THE DATA PROVIDED BY MS. MENARD ON**
17 **PAGE 10, LINE 5 AND FOLLOWING IS CONCLUSIVE**
18 **REGARDING THE LOCATION OF CUSTOMERS THAT ARE**
19 **SERVED BY ALECs?**

20 A. It is difficult to reach that conclusion. Putting aside the proprietary issues
21 raised by Verizon’s review of carrier-specific 911 records, it seems unlikely
22 that Ms. Menard would also have information about the number of

1 customers impacted at each location. A business located in what Verizon
2 considers the Tampa North sub-Rate Center area may have 1,000 employees.
3 Changes to this one customer could have dramatic impacts on a vast
4 enterprise. Consequently, counting customers is best left to the carrier that
5 actually has the account responsibility to that customer.

6 **Q. ON PAGE 16, LINE 9 AND FOLLOWING, MS. MENARD**
7 **DISCUSSES THE AUTHORITY THAT THE COMMISSION HAS**
8 **REGARDING RATE CENTER CONSOLIDATION AND VERIZON.**
9 **DO YOU THINK THERE ARE COMPARABLE ISSUES**
10 **REGARDING REGULATION OF NEW ENTRANTS?**

11 A. Yes, I do. Primarily, it is not clear that the Commission has authority to
12 require ALECs to comply with any particular Rate Center structure. It is
13 possible that this question has not previously been at issue before the
14 Commission. It is also possible that Florida law and regulation may not
15 reach this deeply into the operations of ALECs. Furthermore, any state may
16 find it is without jurisdiction regarding the exact make-up of LERG database
17 entries.

18
19 I am not an attorney, and therefore I am unable to determine the specifics of
20 this Commission's relevant authority in these matters. However, I would
21 suggest caution in requiring ALECs to be in compliance with the Verizon
22 plan.

1 **Q. WHAT ACTION DO YOU SUGGEST THE COMMISSION TAKE**
2 **ON THIS MATTER?**

3 A. I recommend that the Commission allow the LERG to remain unchanged
4 from the single Tampa Rate Center designation that has existed since
5 competition came to Tampa. I recommend that ALECs be allowed to
6 maintain their single Tampa Rate Center structure for toll billing and
7 interconnection agreements, and that Local Number Portability would not be
8 impaired regarding customer movement between points within the Tampa
9 Rate Center. I recommend that any reconciling Verizon must do between the
10 existing Tampa Rate Center and any internal sub-Rate Center designations it
11 chooses be transparent to other carriers that choose not to adopt such internal
12 designations. To implement these recommendations, the Commission
13 should direct Verizon to recall any changes to any industry databases, such
14 as the LERG, that have been implemented to reflect the discontinuance of the
15 single Tampa Rate Center.

16 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

17 Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of The Rebuttal Testimony of Felicia Anne Henderson on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services in Docket 010102-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 5th day of March, 2001.

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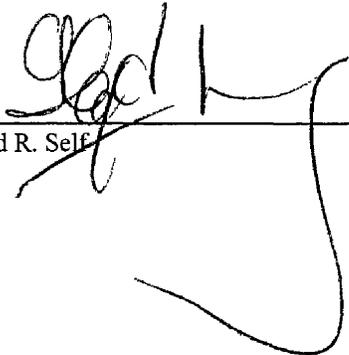
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