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December 23, 1996

BY 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: Docket No. 961153-TL

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Joint Brief and Posthearing Statement of United Telephone Company of Florida and Central Telephone Company of Florida.

We are also submitting the Joint Brief on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

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

Enclosures

cc: All parties of record

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU** _____
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13669 DEC 23 1996

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for numbering plan area)	DOCKET NO. 961153-TL
relief for 904 area code, by BellSouth)	FILED: 12/23/96
Telecommunications, Inc.)	
)	

**JOINT BRIEF AND POSTHEARING STATEMENT OF
UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA**

United Telephone Company of Florida and Central Telephone Company of Florida ("Sprint") file this Joint Brief and Posthearing Statement of Issues and Positions.

I.

INTRODUCTION

A hearing was held in this docket before the full Commission on December 9, 1996. Sprint sponsored the testimony of Sandra A. Khazraee, which testimony was stipulated into the record. [Tr. 216, 217-225]. Ms. Khazraee did not sponsor any exhibits, but did answer cross-examination questions from Staff. [Tr. 226-231]

II.

BASIC POSITION

While all three of the plans proposed by the parties are viable, Plan 1 is the most viable of the three plans. A three-way geographic split with "non-LATA boundary" boundaries is not consistent with industry guidelines and is not in the public interest.

III.

ISSUES AND POSITIONS

Issue 1: What geographic split plan for 904 area code relief should be ordered by the Commission?

Position: *Sprint could support all three of these plans although Plan 1 is preferable. A three-way geographic split with "non-LATA boundary" boundaries is not consistent with industry guidelines and is not in the public interest.

Discussion:

In general, NPA code expansion, or relief planning, can be effected by implementing an NPA split, an NPA realignment, or an NPA overlay. [TR. 218] The NPA split, which has been the alternative chosen for most NPA relief situations to date, divides the exhausting NPA into two geographic areas. [TR. 218] The boundary of an NPA split typically follows demographic, jurisdictional, natural or physical boundaries such as cities, rivers or highways. [TR. 219] The boundaries are chosen to minimize disruption of existing calling patterns as much as possible. [Tr. 219] The existing NPA code is assigned to the geographic area with the greatest number of working lines in order to minimize the number of customers impacted by the NPA change. [Tr. 219]

An NPA realignment is considered when the NPA requiring relief is adjacent to an NPA, within the same state or geographic area, which has spare NXX code capacity. [Tr. 219] A boundary shift occurs so that spare codes in the adjacent NPA can be used in the

NPA requiring relief. [Tr. 219] As a result, the geographic area of the exhausting NPA shrinks, the geographic area of the NPA with spare capacity expands. [Tr. 219]

In an NPA overlay, code relief is provided by opening up a new NPA within the same geographic area. [Tr. 219] Numbers for the new NPA are assigned to new growth on a carrier neutral basis; first come first served. [Tr. 219] Although mandatory customer number changes are eliminated, ten digit dialing is required for local calling. [Tr. 219]

The NPA overlay has been implemented to date only in New York City, where it was limited to wireless providers' use. [Tr. 219] Ameritech, in the Chicago area, attempted to institute an overlay, but due to their requirement for wireless providers to relinquish existing numbers, the FCC found the Ameritech plan "would unreasonably discriminate against wireless carriers" and overruled it. [Tr. 220] In follow up to this ruling, the FCC provided further clarification on the use of NPA overlays in the Second Report and Order on Interconnection (CC Docket No. 96-333) adopted August 8, 1996. [Tr. 220] Overall, the FCC declared technology specific (i.e., wireless only) overlays are not allowed, as in the Ameritech case. [Tr. 220] The FCC further directed that a state commission may choose implementation of an NPA overlay subject to two conditions: 1) mandatory ten digit local dialing by all customers between and within area codes in the area covered by the new code; and 2) availability to every existing telecommunication carrier, including CMRS providers, authorized to provide telephone

exchange service in the affected area code 90 days before the introduction of a new overlay code, of at least one NXX in the existing area code. [Tr. 220]

Sprint supports the NPA split and the NPA overlay when the FCC conditions are met. [Tr. 220] Sprint's first choice is the NPA split. The NPA split does not require ten digit dialing for all calls as the NPA overlay does. [Tr. 221] Additionally, technical aspects associated with an NPA split have been addressed in previous NPA relief implementations within the state and established implementation procedures are generally understood. [Tr. 221] Customers are more educated about the NPA split process and would likely experience less confusion than with the NPA overlay.

With this as background, Sprint believes that Option 1 is the most viable of the three options identified by the industry working group. [Tr. 223] Under Plan 1, the 850 NPA would be assigned to the Pensacola, Panama City and Tallahassee LATAs. [Tr. 221] The 904 NPA would remain assigned to the Jacksonville and Daytona Beach LATAs. [Tr. 221] Based on the NXX forecasts filed by the code holders with BellSouth, this plan would extend the life of the 904 NPA through approximately September of 2002 and would not exhaust the 850 NPA until approximately November of 2006. [Tr. 221] Plan 1 most closely follows Bellcore's guidelines for NPA relief in that the existing NPA code is left with the geographic area that has the largest number of working telephone numbers. Additionally, Plan 1 is estimated to provide relief for a reasonable number of years for

both the 904 and 850 NPAs. [Tr. 222]

While it may be technically feasible, Sprint is opposed to a three-way geographic split with "non-LATA boundary" boundaries, because doing so is not consistent with industry guidelines and is not in the public interest. As noted above, the boundary of an NPA split typically follows demographic, jurisdictional, natural or physical boundaries such as cities, rivers or highways. [Tr. 219] The boundaries are chosen to minimize disruption of existing calling patterns as much as possible. [Tr. 219] As noted by Ms. Khazraee on cross-examination, LATA boundaries often reflect communities of interest with the same types of calling scopes, and splitting an NPA along a LATA boundary is preferable to a non-LATA boundary split. [Tr. 229] In any event, exchange boundaries should be left in tact, and under no circumstances should wire centers be split by different NPAs.

Issue 2: *How and when should the area code relief be implemented?

Position: The longest possible permissive dialing period needs to be instituted, preferably a permissive dialing period of one year. All involved telecommunications companies and the Commission need to work together to mitigate the negative impact to all customers affected by this NPA split.

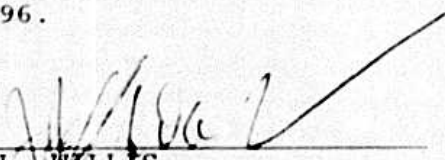
Discussion:

As the Commission well knows, an NPA split can cause significant customer confusion. Accordingly, all involved

telecommunications companies and the Commission need to work together to mitigate the negative impact to the affected customers. [Tr. 224] The involved parties should refer to the plan followed in the 305/954 NPA split which occurred in Dade and Broward counties. [Tr. 224-225] Minimal customer complaints were received during that transition from one NPA to another because of the proactive steps taken by the Commission and BellSouth. [Tr. 224-225]

Importantly, the LECs should work with the State of Florida to ensure a smooth transition to the new NPA. [Tr. 225] With seven dedicated NXX codes and approximately 40,000 centrex lines working in the Tallahassee area, the State has a significant stake in this NPA split. [Tr. 225] Each LEC should work with the State to assure that the "Blue" government pages are updated in all directories. The LECs should also work with the State to help identify issues early in the planning process and assure all details are addressed. [Tr. 225]

DATED this 23d day of December, 1996.



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CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 23d day of December, 1996, to the following:

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