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Writer's Direct Dial No.
(904) 425-2313

September 22, 1997

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket 971058-TL

Dear Ms. Bayó:

Enclosed for filing in the above docket on behalf of MCI Telecommunications Corporation are the original and 15 copies of the direct testimony of Beth Kistner.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

Richard D. Melson

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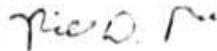
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Dear Ms. Bayó:

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Very truly yours,



Richard D. Melson

RDM/cc
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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
2 **DIRECT TESTIMONY OF ELIZABETH G. KISTNER**
3 **ON BEHALF OF MCI TELECOMMUNICATIONS CORPORATION**

4 **DOCKET NO. 971058**

5 **SEPTEMBER 22, 1997**

6
7 **I. INTRODUCTION**

8
9 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

10 **A. My name is Elizabeth G. Kistner. My business address is 3 Spoede**
11 **Ridge, St. Louis, Missouri 63141.**

12
13 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
14 **BACKGROUND.**

15 **A. I am a consultant in private practice, specializing in analysis of**
16 **telecommunications public policy issues. During the past three and**
17 **a half years, I have focused on issues related to the introduction of**
18 **competition in the local exchange market, and especially on local**
19 **number portability ("LNP") implementation and numbering issues.**
20 **With respect to LNP, I have been involved in all aspects of national**
21 **LNP implementation on behalf of MCI, including participation in**
22 **numerous state LNP workshops, and in the North American**
23 **Numbering Council's Local Number Portability Administration**
24 **Selection Work Group. With respect to numbering issues, I have**
25 **participated on MCI's behalf in numerous state area code relief**

1 industry meetings and regulatory proceedings. I also represent
2 MCI on the Carrier Liaison Committee ("CLC") Ad Hoc Committee
3 on NXX Exhaust, the Illinois Number Pooling Subcommittee, and
4 the Texas Number Conservation Workshop

5
6 Before entering private practice, I was employed for eight years by
7 MCI Telecommunications Corporation ("MCIT"). From 1989 to
8 1990, I was Manager, Market and Business Analysis, in the
9 Marketing Department, responsible for providing intrastate pricing
10 and competitive market analysis. From 1986 to 1989, I was a
11 Staff Analyst in the Regulatory Department -- Southwest Division,
12 responsible for analyzing the impact of LEC intrastate access and
13 toll tariffs filed in Missouri, Arkansas, Kansas, Oklahoma, and
14 Texas, with emphasis on tariffs impacting 800 and WATS-type
15 services. From 1982 to 1986, I worked in MCI's Litigation
16 Support Department in Washington, D.C., providing supervisory
17 and analytical support to MCI litigation efforts.

18
19 I am a graduate of Tufts University, Medford, Massachusetts, with
20 a Bachelor of Arts in International Relations.

21
22 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY**
23 **PROCEEDINGS?**

24 **A.** Yes. I have testified on behalf of MCI in the states of Florida,
25 Georgia, Oklahoma, Missouri, New Jersey, Pennsylvania, Texas

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and Michigan.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to identify competitive implications related to BellSouth's proposal for area code relief in the 305 area, as outlined in the Direct Testimony filed by Daniel Baeza, and suggest certain conditions that should attach to any decision to implement an overlay area code in the 305 area.

III. AREA CODE RELIEF ALTERNATIVES AND IMPACTS

Q. WHAT AREA CODE RELIEF OPTIONS ARE BEING CONSIDERED FOR THE 305 AREA?

A. Mr. Baeza discusses two different options BellSouth reviewed for area code relief -- a geographic split and an overlay.

The geographic split alternatives would split the existing 305 area into two geographic areas. Under the split alternative, customers in one portion of the 305 area would retain their 305 area code, and customers in the other portion would get the new area code.

The overlay alternative would introduce the new area code by

1 adding it to the existing 305 area.

2

3 **Q. MR. BAEZA STATES THAT "THE INDUSTRY REACHED**
4 **CONSENSUS" THAT THE OVERLAY ALTERNATIVE WAS THE**
5 **BEST METHOD FOR AREA CODE RELIEF IN THE 305 AREA. DO**
6 **YOU BELIEVE A TRUE "CONSENSUS" WAS REACHED IN**
7 **SUPPORT OF AN OVERLAY?**

8 **A.** No. In common industry practice, a claim of "consensus" is only
9 made when a substantial majority *of each affected industry*
10 *segment* are in agreement. However, in this case of so-called
11 consensus, not a single CLEC supported the overlay proposal,
12 according to BellSouth's own record of the June 30, 1997 meeting
13 on 305 area code relief at which BellSouth claimed an industry
14 consensus in support of an overlay was reached. (See July 15,
15 1997 letter from N. H. Sims to Walter D'Haeseleer, and attached
16 meeting minutes). In fact, I would expect BellSouth to be well
17 aware of the consistent objections of MCI and other CLECs to
18 overlays, voiced in regulatory proceedings throughout the
19 BellSouth states and across the country. Therefore, BellSouth's
20 claim here that an "industry consensus" was reached for an
21 overlay in the 305 area would seem at the very least to be an
22 irresponsible characterization.

23

24 **Q. WHAT TYPES OF IMPACTS SHOULD THE COMMISSION**
25 **CONSIDER WHEN DECIDING WHICH ALTERNATIVE IS BEST FOR**

1 **THE 305 AREA?**

2 A. In selecting which area code relief alternative is best for the 305
3 area, the Commission should consider both end user impacts, and
4 impacts on emerging local competition, and to what extent, if any,
5 negative impacts can be mitigated.

6

7 **Q. WHAT ARE THE IMPACTS OF THE SPLIT AND OVERLAY**
8 **ALTERNATIVES ON END USERS?**

9 A. Unfortunately, some end users will suffer some cost and disruption
10 under either the split or overlay alternatives, although the degree to
11 which end users are negatively impacted differs based on whether
12 a split or overlay alternative is selected, and other unique
13 circumstances in the affected area.

14

15 The end user impacts of an overlay include: loss of all 7-digit local
16 dialing (because the Federal Communications Commission ("FCC")
17 requires mandatory 10-digit dialing for all local calls as a condition
18 for overlay implementation); loss of the ability to associate an area
19 code with a unique geographic area code; confusion resulting from
20 different area codes assigned in the same home, business or
21 neighborhood; cost to customers (throughout the overlay area) that
22 currently use their 7-digit number for advertising, stationery, etc.,
23 for new materials with their 10-digit number; and cost to
24 customers (throughout the overlay area) to reprogram or replace
25 automatic dialing systems (e.g., home alarm and apartment

1 security systems, elevator emergency phones, etc.) that are
2 currently programmed for 7-digits.

3

4 The end user impacts of an area code split include: need for
5 customers in a portion of the existing area code to change area
6 codes; some additional 10-digit dialing required for calling between
7 the old and new area codes; and cost to customers in the new
8 area code to change advertising, stationery, etc., to show the new
9 area code.

10

11 **Q. WHAT ARE THE IMPACTS OF THE SPLIT AND OVERLAY**
12 **ALTERNATIVES ON EMERGING LOCAL EXCHANGE**
13 **COMPETITION?**

14 A. An overlay plan can significantly frustrate entry by competitors
15 into the local exchange market, and provide BellSouth with a
16 competitive advantage, because of the disproportionate
17 assignment of central office codes (called "NXXs") in the 305 area
18 code to BellSouth.

19

20 An overlay plan would introduce a new, unfamiliar area code into
21 the area currently served by the 305 area code. Callers from
22 within and outside of Florida are used to the 305 code, and
23 recognize it as being the Miami and Florida Keys areas. The new
24 overlaid code, however, would not be familiar, and would thus be
25 less desirable than the existing area code. As a result, customers

1 would be more likely to select a carrier that could give them a
2 number in the more desirable area code.

3
4 Currently, the vast majority of these more desirable NXXs in the
5 305 area code have been assigned to BellSouth, so if an overlay is
6 implemented, new Competitive Local Exchange Companies
7 ("CLECs") would be left to draw NXXs primarily from the new,
8 overlay NPA. This systems of NXX "haves" and "have-nots" is
9 extremely anticompetitive, since it disproportionately affects
10 CLECs just as they are attempting to enter the local exchange
11 market in the 305 area.

12
13 The FCC recognized this disadvantage in its *Second Report and*
14 *Order and Memorandum Opinion and Order*, CC Docket 96-98,
15 August 8, 1996 ("*Local Competition - Numbering Order*"). The
16 FCC noted that incumbent LECs have an advantage over new
17 entrants when a new code is about to be introduced, because they
18 can warehouse NXXs in the old NPA. Incumbents also have an
19 advantage when telephone numbers within NXXs within the
20 existing area code are returned to them as their customers move or
21 change carriers. (*Order* at ¶289).

22

23 **Q. HOW CAN THIS AFFECT EMERGING COMPETITION IN THE 305**
24 **LOCAL SERVICE MARKET?**

25 **A.** This unfair situation will affect the potential for competition in the

1 305 area in several ways. CLECs will be unable to compete
2 effectively in the growth market of additional lines for fax
3 machines, modems, and the like. This market is explosive, and is
4 a primary contributor to the need for NPA relief at this time. Even
5 if the scheduled number portability systems allow customers to
6 switch to a CLEC without losing their telephone number, these
7 same customers will be less willing to use a CLEC for a second or
8 third line, even if the CLEC is less expensive or provides better
9 service, because the CLEC will only be able to install additional
10 lines if it uses the new, less desirable area code. This disparity
11 between NPAs can also impact the market for new customers,
12 since new customers may choose a carrier based on that carrier's
13 ability to assign a number from the more well-known area code.

14

15 **Q. THE FCC REQUIRED THAT AT LEAST 1 NXX FROM THE OLD**
16 **AREA CODE BE RESERVED FOR EACH CLEC. WON'T THAT**
17 **ELIMINATE THIS CONCERN?**

18 **A. No. The FCC only required that a single NXX in the old area code**
19 **be reserved for new entrants in an overlay plan area. This fails to**
20 **recognize that a CLEC must limit its use of each NXX to a single**
21 **ILEC rate center, in order to preserve current end user rating and**
22 **billing. There are multiple rate centers in the 305 area, and each**
23 **CLEC would need 1 or more NXXs per rate center in order to be**
24 **able to match BellSouth in its ability to offer new service**
25 **customers additional numbers in their matching 305 area code.**

1 **Q. CAN BELLSOUTH TAKE ADVANTAGE OF THEIR DOMINANT**
2 **CONTROL OF 305 NXXS?**

3 **A. Yes. According to Mr. Baeza's testimony, BellSouth can and will**
4 **take advantage of their dominance in 305 NXXs. He states, at p.**
5 **9 of his Direct testimony:**

6 BellSouth plans to design its number assignment
7 systems to assign additional telephone numbers based
8 on customer's existing area code, wherever possible,
9 in an effort to assign telephone numbers in the same
10 area code in which existing service is assigned.

11
12 As this testimony indicates, BellSouth recognizes the importance
13 to customers, in the event an overlay is implemented, of getting
14 numbers within their existing area code when adding additional
15 service. However, a number assignment system such as the kind
16 BellSouth plans to design is of no use if a carrier doesn't have a
17 supply of numbers from the old area code in the first place. Unlike
18 BellSouth, CLECs will likely not have even a single NXX for each
19 rate center in the 305 area, much less many NXXs per rate center
20 as BellSouth has. Thus, CLECs will be unable to offer similar
21 benefits to customers, and will therefore be competitively
22 disadvantaged by the overlay

23

24 **Q. DOES A GEOGRAPHIC SPLIT HAVE THIS SAME**
25 **DISPROPORTIONATE IMPACT ON CLECS?**

26 **A. No, a geographic spit affects all carriers equally. If a geographic**
27 **split were selected for the 305 area, all carriers -- both BellSouth**
28 **and new carriers -- would issue 305 numbers in the remaining 305**

1 area, and all carriers would issue numbers with the new area code
2 in the new area. Thus, all carriers would have equal access to the
3 same number resource.

4

5 **Q. DOES MCI RECOMMEND THAT A GEOGRAPHIC SPLIT OR**
6 **OVERLAY OPTION BE IMPLEMENTED IN THE 305 AREA?**

7 **A.** MCI has consistently recommended geographic splits for area code
8 relief, because on balance splits are usually less disruptive to
9 consumers, and they do not have the same anticompetitive impact
10 on local competition as overlays. However, MCI recognizes that
11 this Commission must consider all the circumstances unique to the
12 305 area to decide which relief alternative is best at this time.

13

14 If the Commission chooses an overlay alternative, though, it is
15 critical that the Commission take steps to mitigate the
16 anticompetitive impacts of an overlay, and more efficiently use the
17 limited number resource so as to reduce the need for more
18 disruptive area code relief.

19

20 **Q. WHAT STEPS CAN THE COMMISSION TAKE TO REDUCE THE**
21 **ANTICOMPETITIVE IMPACTS OF AN OVERLAY?**

22 **A.** If an overlay alternative is selected for the 305 area, MCI urges the
23 Commission to establish the following four conditions:

24

- 1) No slippage in the current BellSouth proposed LNP
25 implementation plan.

- 1 2) Requirement for 10-digit dialing within and between all
- 2 old and new area codes (consistent with FCC order).
- 3 3) Requirement for BellSouth to analyze and report on the
- 4 feasibility of a revenue-neutral Rate Center Consolidation
- 5 plan for the 305 area.
- 6 4) Establishment of a workshop or other appropriate process
- 7 for consideration of a number pooling mechanism for the
- 8 Miami LNP area.

9

10 **Q. WHY IS BELLSOUTH'S PROPOSED LNP IMPLEMENTATION PLAN**

11 **IMPORTANT TO MITIGATE ANTICOMPETITIVE IMPACTS OF AN**

12 **OVERLAY?**

13 **A. Although LNP implementation does not solve the competitive**

14 **disparity caused by the disproportionate allocation of NXXs needed**

15 **for new service applications, it does facilitate the ability of end**

16 **users to keep their existing 305 numbers when switching their**

17 **existing service to a new carrier. As a result, LNP is one of several**

18 **critical components of a competitively neutral overlay.**

19

20 According to the FCC's LNP schedule, implementation in the Miami

21 MSA is to be completed by May 15, 1998. Thus, under the

22 current proposed schedule, the requested end offices in the 305

23 area should be open to LNP by the proposed effective date of the

24 new overlay code (July 1, 1998, according to BellSouth).

25

1 Accordingly, MCI asks that the Commission include as a
2 requirement for any overlay it might order, that BellSouth adhere to
3 this implementation schedule, under which all requested end
4 offices are opened to portability prior to overlay implementation.
5

6 **Q. WHY IS 10-DIGIT DIALING A CRITICAL FACTOR IN MITIGATING**
7 **THE ANTICOMPETITIVE IMPACTS OF AN OVERLAY?**

8 A. The FCC concluded that local dialing disparity would occur absent
9 mandatory 10-digit dialing, because all existing users would remain
10 in the old area code and dial 7-digits to call others with numbers in
11 that area code, while new users with the overlay code would have
12 to dial 10-digits to reach any customers in the old code. (*Local*
13 *Competition - Numbering Order*, ¶287). As a result, customers
14 would find it less attractive to switch carriers because CLECs
15 would have to assign their customers numbers in the new overlay
16 area code, which would require those customers to dial 10-digits,
17 while those customers would only have to dial 7-digits for most of
18 their calls if they remained with the incumbent carrier.
19

20 **Q. HOW WILL RATE CENTER CONSOLIDATION HELP TO MITIGATE**
21 **THE ANTICOMPETITIVE IMPACTS OF AN OVERLAY?**

22 A. Rate Center Consolidation ("RCC") involves the combining, or
23 collapsing, of existing incumbent LEC rating areas into fewer rate
24 areas, so that fewer NXXs are required by a carrier serving a local
25 calling area.

1 In North America, each central office is assigned a "rate center"
2 for determining the rating and routing of calls in and out. All the
3 subscribers to that central office are considered to exist at a single
4 point at the center of the rate area. The 305 area is carved into
5 multiple separate rate areas. Since today all rating and routing is
6 accomplished based on the NPA-NXX digits of a telephone
7 number, CLECs are forced to use unique NXXs for customers in
8 each incumbent rate area in order to preserve incumbent LEC
9 rating. This can lead to an enormous waste of NXXs, especially as
10 CLECs are first entering the local market, because their total
11 customer bases initially will not require so many 10,000 number
12 blocks.

13
14 The original purposes for establishing numerous rate areas — older
15 switch technology and cost variations based on small differences
16 in call distances — no longer exist. Rate Center Consolidation in
17 the 305 area into fewer rate areas would reduce the number of
18 NXXs required by CLECs, and would allow incumbent LECs to use
19 their NXXs more efficiently. Moreover, if an overlay were
20 implemented, RCC would allow CLECs to make greater use of the
21 few NXXs they manage to acquire in the 305 area code, thus
22 reducing the anticompetitive impacts of overlays.

23
24 **Q. HOW CAN A RCC PLAN BE IMPLEMENTED IN THE 305 AREA?**

25 **A.** A change in rate areas is a relatively simple task from a technical

1 standpoint, but it would necessarily cause impacts (revenue
2 neutral) on end user call rating. Therefore, MCI urges the
3 Commission to direct BellSouth to work with the industry to
4 develop a plan to present to the Commission within ninety (90)
5 days of an order in this proceeding, which would describe one or
6 more revenue neutral plans for consolidating rate areas in the 305
7 area, the impact on end user billing, the impact on NXX demand,
8 and any technical considerations. The Commission can then
9 determine if the long term benefits to Florida outweigh any
10 negative short term impacts.

11

12 **Q. HOW CAN NUMBER POOLING HELP TO MITIGATE THE**
13 **ANTICOMPETITIVE IMPACTS OF AN OVERLAY?**

14 **A. Number pooling can mitigate the anticompetitive impact of**
15 **overlays by giving CLECs access to more numbers in the old, more**
16 **desirable area code. National industry numbering forums, such as**
17 **the Industry Numbering Committee ("INC") are currently**
18 **considering the development of a long-term number pooling**
19 **solution, but a full pooling solution (i.e., down to the individual line**
20 **level) may take several years to develop and implement. In the**
21 **meantime, carriers have begun looking at an interim pooling**
22 **solution that would use the LNP database to enable the assignment**
23 **of NXXs in blocks of 1000 numbers, rather than the 10,000**
24 **number blocks required today. This potential solution, sometimes**
25 **referred to as "1000's block pooling," or "NXX-X/LRN pooling,"**

1 would assign an NPA-NXX to a rate area, but allow that NPA-NXX
2 to be shared among local service providers who are LNP-capable
3 and offer service to customers within that area. So, for example, a
4 single NXX could be used by as many as 10 CLECs for a given rate
5 area, instead of the 10 NXXs that would be required without this
6 type of pooling. Thus, 1000's block number pooling would give
7 CLECs access to more numbers in the old, more desirable area
8 code.

9
10 Although a long-term number pooling solution may not be available
11 for several years, an interim pooling mechanism such as 1000's
12 block number pooling can be implemented in the near term.

13 Carriers in Illinois, including Ameritech, have established a pooling
14 implementation team, and propose to test 1000's block number
15 pooling in first quarter 1998. Carriers in Pennsylvania and Texas
16 are also reviewing NXX-X/LRN pooling for implementation.

17 Accordingly, MCI urges the Commission to establish a workshop or
18 other appropriate process for consideration of a number pooling
19 mechanism for the Miami LNP area.

20

21 **Q. ARE THEIR OTHER BENEFITS OF RATE CENTER CONSOLIDATION**
22 **AND NUMBER POOLING?**

23 **A.** Yes. In addition to mitigating the anticompetitive impacts of an
24 overlay, Rate Center Consolidation and number pooling can sharply
25 reduce the overall demand for NXXs. Taking steps now to

1 conserve the finite number resource will mean that future area
2 code relief in the 305 area can be postponed, thus protecting
3 Florida consumers from experiencing continued disruptions from
4 area code relief any more often than absolutely necessary.

5

6

IV. CONCLUSION

7

8 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION**
9 **REGARDING AREA CODE RELIEF FOR THE 305 AREA?**

10 **A. MCI recognizes that the Commission will consider all relevant end**
11 **user and competitive impacts. If, upon consideration, the**
12 **Commission decides that area code relief in the 305 area should be**
13 **accomplished with an overlay, then the Commission should include**
14 **as conditions to it's decision the following four requirements:**

15 1) No slippage in the current Miami LNP implementation
16 schedule.

17

18 2) Requirement for 10-digit dialing within and between all
19 old and new area codes (consistent with FCC order).

20

21 3) Requirement for BellSouth to analyze and report on the
22 feasibility of a revenue-neutral Rate Center Consolidation
23 plan for the 305 area.

24

25 4) Establishment of a workshop or other appropriate process

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for consideration of a number pooling mechanism for the
Miami LNP area.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 22nd day of September, 1997.

Martha Brown
Division of Legal Services
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CERTIFICATE OF SERVICE B. KRISTNER

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