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January 30, 1998

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

Re: **Docket No. 980048-TL**
Request for review of proposed numbering plan relief for 813 area code

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of the Direct Testimonies of Beverly Y. Menard and Sergin J. Gancarz on behalf of GTE Florida Incorporated for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell
Kimberly Caswell

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Enclosures

A part of GTE Corporation

Menard at 548-918
Living 315-22-99

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CERTIFICATE OF SERVICE

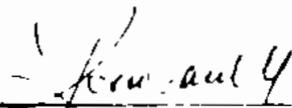
I HEREBY CERTIFY that copies of the Direct Testimonies of Beverly Y. Menard and Sergin J. Gancarz on behalf of GTE Florida Incorporated in Docket No 980048-TL were sent via overnight delivery on January 29, 1998 to

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Kimberly Caswell

OPTIONAL

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GTE FLORIDA INCORPORATED
TESTIMONY OF BEVERLY Y. MENARD
DOCKET NO. 980048-TL

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH GTE.

A. My name is Beverly Y. Menard. My business address is One Tampa City Center, Tampa, Florida 33601-0110. My current position is Regional Director - Regulatory and Industry Affairs and I am employed by GTE Service Corporation.

Q. WILL YOU BRIEFLY STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE?

A. I joined GTE Florida (GTEFL) in February 1969. I was employed in the Business Relations Department from 1969 to 1978, holding various positions of increasing responsibility, primarily in the area of cost separations studies. I graduated from the University of South Florida in June of 1973 receiving a Bachelor of Arts Degree in Business Administration with an Accounting Major. Subsequently, I received a Master of Accountancy Degree in December of 1977 from the University of South Florida. In March of 1978, I became Settlements Planning Administrator with GTE Service Corporation. In January of 1981, I was named Manager-Division of Revenues with GTE Service Corporation, where I was responsible for the administration of the GTE division

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1 of revenues procedures and the negotiation of settlement matters
2 with AT&T. In November of 1981, I became Business Relations
3 Director with GTEFL. In that capacity, I was responsible for the
4 preparation of separations studies and connecting company
5 matters. Effective February 1987, I became Revenue Planning
6 Director. In this capacity, I was responsible for revenue, capital
7 recovery and regulatory issues. On October 1, 1988, I became
8 Area Director - Regulatory and Industry Affairs. In that capacity,
9 I was responsible for regulatory filings, positions and industry
10 affairs in eight southern states plus Florida. In August 1991, I
11 became Regional Director - Regulatory and Industry Affairs for
12 Florida. I am responsible for regulatory filings, positions and
13 industry affairs issues in Florida.

14
15 **Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC**
16 **SERVICE COMMISSION?**

17 **A. Yes. I have testified before this Commission on numerous**
18 **occasions.**

19
20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
21 **DOCKET?**

22 **A. The purpose of my testimony is to present GTEFL's position on**
23 **the appropriate relief for the 813 area code. In addition, I will**
24 **address the dialing patterns that should be utilized in the 813 area**
25 **code.**

1 Q. SHOULD THE COMMISSION APPROVE THE OVERLAY PLAN FOR
2 THE 813 AREA CODE RELIEF?

3 A. Yes. As discussed in the testimony of Mr. Gancarz, this was the
4 relief that was unanimously approved by the current code holders
5 in the 813 area code.

6
7 Q. WHY DOES GTE SUPPORT THE OVERLAY PLAN?

8 A. GTE believes that the overlay is the least disruptive and most
9 long-term solution for this area. I believe that the 813 area code
10 already covers the smallest geographic area in Florida. In
11 addition, GTE and most of its customers consider this area as one
12 metropolitan area. The vast majority of the calls within the 813
13 area code are dialed on a seven digit basis.

14
15 Q. WHY ARE SO MANY CALLS DIALED ON A SEVEN DIGIT BASIS?

16 A. The Tampa to St. Petersburg/Clearwater areas were the first areas
17 of the state converted to Extended Calling Service (ECS). In this
18 case, the traffic patterns met the Commission's EAS community
19 of interest rule requirements for aggregate calling per main station
20 but did not meet the required distribution of calling across all
21 subscribers to warrant flat-rate EAS service. In addition, we had
22 numerous customer requests to find a solution which would allow
23 all Tampa/St. Petersburg/Clearwater customers who flew into the
24 Tampa airport to be able to make a call home by dialing on a
25 seven-digit basis and for the price of a local coin call.

1 **Because** the calling levels were significant, though not satisfying
2 **the EAS rule**, it was apparent to GTE, as well as the Commission
3 at that time, that a seven-digit, local calling plan should be
4 introduced for this area. The first ECS routes were implemented
5 in March 1992. As a result of the Commission's decision to
6 implement ECS and to not allow toll competition on the ECS
7 routes, the Commission Order was appealed to the Florida
8 Supreme Court. The Florida Supreme Court upheld the
9 Commission's decision to deny toll competition on these routes.

10
11 **Q. ARE THERE ADDITIONAL REASONS WHY GTE SUPPORTS THE**
12 **OVERLAY PLAN?**

13 **A. Due to the concentrated area in the 813 area code, and the local**
14 **calling areas in place, GTE does not believe there is any**
15 **geographic split which will not cause confusion on the appropriate**
16 **dialing patterns. One half of the customers will be required to**
17 **make a number change and cellular phones will have to be**
18 **reprogrammed in the event of a geographic split.**

19
20 In addition, if a geographic split is implemented at this time, there
21 is no geography left for any logical, further subdivision of this
22 area. Therefore, GTE believes that an overlay will be inevitable
23 along with ten-digit dialing.

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Q. WHAT SHOULD THE DIALING PATTERN BE FOR LOCAL CALLS?

A. If the overlay is implemented, all local calls would be dialed on a ten-digit basis. If a geographic split is implemented, some local calls should be dialed on a ten-digit basis.

Q. WHY SHOULD ANY LOCAL CALLS BE DIALED ON A TEN DIGIT BASIS WHEN YOU IMPLEMENT A GEOGRAPHIC SPLIT?

A. Due to the local/EAS/ECS calling areas and concentrated area in the 813 area code, there is no dividing line which will not split some local calling area. Exhibit No. BYM-1 shows the proposed dialing patterns for the overlay and the various geographic split options presented in Mr. Gancarz's testimony.

Q. WHAT ARE THE INDUSTRY GUIDELINES ON LOCAL CALLING BETWEEN DIFFERENT AREA CODES?

A. The industry guidelines state that inter-NPA calls should be done on a ten-digit basis to insure against code conflicts and inefficient usage of NXXs. Of course, with an overlay, these code conflicts are not present.

Q. WHAT SHOULD THE DIALING PATTERN BE FOR TOLL CALLS?

A. GTE completed the conversion for intraLATA equal access in February 1997. The dialing pattern for the toll routes shown in Exhibit No. BYM-1 will continue to be 1 + 10 digits regardless of

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the relief plan which is implemented. Customers are also able to dial calls on these routes on a 10XXX basis.

Q. WHAT SHOULD THE DIALING PATTERN BE FOR EAS CALLS?

A. If the overlay is implemented, all EAS calls would be dialed on a ten-digit basis. If a geographic split is implemented, some EAS calls should be dialed on a ten-digit basis as shown in Exhibit No. BYM-1.

Q. WHAT SHOULD THE DIALING PATTERN BE FOR ECS CALLS?

A. If the overlay is implemented, all ECS calls would be dialed on a ten-digit basis. If a geographic split is implemented, some ECS calls should be dialed on a ten-digit basis and some could remain on a seven-digit basis as shown in Exhibit No. BYM-1.

Q. HAS THE COMMISSION MADE A DECISION ON THE LONG-TERM DIALING PATTERNS IN FLORIDA WHICH DETERMINES THE DIALING PATTERNS FOR ECS CALLS?

A. No. The Commission did initiate an investigation on dialing patterns in Docket No. 960090-TP. The Commission issued an Order on April 25, 1996 which affected a number of BellSouth routes.

1 Q. **WHAT WAS THE COMMISSION'S RECOMMENDATION FOR THE**
2 **DIALING PATTERN FOR ECS CALLS IN THE LONG TERM?**

3 A. The recommendation was to dial all ECS calls on a 1 + 10 digit
4 basis.

5

6 Q. **DO YOU SUPPORT THIS RECOMMENDATION FOR THE ECS**
7 **ROUTES WITHIN THE 813 AREA CODE?**

8 A. No. The decision in the BellSouth case was prior to the
9 introduction of intraLATA presubscription. In addition, the
10 BellSouth ECS routes in that docket were all routes where toll
11 competition was allowed.

12

13 Q. **WHAT OTHER CONCERNS DO YOU HAVE WITH THE**
14 **RECOMMENDATION FOR 1 + 10 DIGIT DIALING FOR ECS CALLS?**

15 A. With the implementation of intraLATA presubscription, when a
16 customer dials the digit "1", the call is transported by the
17 customer's chosen carrier. In the BellSouth case, if a customer
18 wants ECS on an intraLATA route with toll competition, the
19 customer must choose its serving LEC as his presubscribed
20 carrier. A customer can not presubscribe to a carrier other than
21 his serving LEC in order to get ECS.

22

23 On local-only ECS routes, we would be disturbing the basic
24 premises of intraLATA presubscription if we were to implement
25 1 + 10 digit dialing on these routes with all ECS calls being routed

1 to GTE instead of the presubscribed carrier. It would also create
2 customer confusion as to why GTE was handling these calls
3 instead of their presubscribed carrier. In addition, GTE's billing
4 system will not recognize a 1+ call as local ECS. Since
5 intraLATA prescription had not been implemented at the time
6 of the BellSouth Order and no discussion was held relative to local
7 ECS routes, GTE does not believe this area was addressed in the
8 prior docket.

9
10 **Q. WOULD YOU PLEASE SUMMARIZE WHY GTE SUPPORTS THE**
11 **OVERLAY PLAN?**

12 **A. Yes. The overlay plan is the best method to provide uniformity**
13 **and consistency throughout the metropolitan area. It avoids the**
14 **confusion of having different dialing patterns for the same type of**
15 **call in an area where people live and work between the**
16 **communities.**

17
18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19 **A. Yes, it does.**
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Toll Routes Within 813/727 Area Codes

Pasco-Pinellas

Hudson - Clearwater
Hudson - St. Petersburg
Hudson - Tarpon Springs
New Port Richey - St. Petersburg
Zephyrhills - Clearwater
Zephyrhills - St. Petersburg
Zephyrhills - Tarpon Springs

Pasco - Hillsborough

Hudson - Plant City
Hudson - Tampa (all rate centers)
New Port Richey - Plant City
New Port Richey - Tampa (Central, East, South)

Pasco - Pasco

Hudson - Zephyrhills
New Port Richey - Zephyrhills

Pinellas - Hillsborough

Clearwater - Plant City
St. Petersburg - Plant City
Tarpon Springs - Plant City

Note: The county shown for each exchange is based on the predominant county as the exchange boundaries are not the same as the county boundaries.

Local Dialing Patterns with 727 Overlay Area Code

10-digit Local Calls

Clearwater
Hudson
New Port Richey
Plant City
St. Petersburg
Tampa
Tarpon Springs
Zephyrhills

10-digit EAS Calls

Clearwater - St. Petersburg
Clearwater - Tampa West
Clearwater - Tarpon Springs
Hudson - New Port Richey
New Port Richey - Tarpon Springs
Plant City - Tampa
Tampa North - Zephyrhills

10-digit ECS Calls

Clearwater - New Port Richey
Clearwater - Tampa (Central, East, South, West)
Hudson - Tarpon Springs
New Port Richey - Tampa (North, West)
St. Petersburg - Tampa
St. Petersburg - Tarpon Springs
Tampa (Central, East, South, West) - Zephyrhills
Tampa - Tarpon Springs

Hillsborough/Pasco (813), Pinellas/Pasco (727)

7-digit Local Calls

Clearwater
Hudson
New Port Richey
Plant City
St. Petersburg
Tampa
Tarpon Springs
Zephyrhills

7-digit EAS Calls

Clearwater - St. Petersburg
Clearwater - Tarpon Springs
Hudson - New Port Richey
New Port Richey - Tarpon Springs
Plant City - Tampa
Tampa North - Zephyrhills

10-digit EAS Calls

Clearwater - Tampa West

7-digit ECS Calls

Clearwater - New Port Richey
Hudson - Tarpon Springs
St. Petersburg - Tarpon Springs
Tampa (Central, East, South, West) - Zephyrhills

10-digit ECS Calls

Clearwater - Tampa (Central, East, South, West)
New Port Richey - Tampa (North, West)
St. Petersburg - Tampa
Tampa - Tarpon Springs

Hillsborough/Pasco (813), Pinellas (727)

7-digit Local Calls

Clearwater
Hudson
New Port Richey
Plant City
St. Petersburg
Tampa
Tarpon Springs
Zephyrhills

7-digit EAS Calls

Clearwater - St. Petersburg
Clearwater - Tarpon Springs
Hudson - New Port Richey
Plant City - Tampa
Tampa North - Zephyrhills

10-digit EAS Calls

Clearwater - Tampa West
New Port Richey - Tarpon Springs

7-digit ECS Calls

Hudson - Tarpon Springs
St. Petersburg - Tarpon Springs
Tampa (Central, East, South, West) - Zephyrhills

10-digit ECS Calls

Clearwater - New Port Richey
Clearwater - Tampa (Central, East, South, West)
New Port Richey - Tampa (North, West)
St. Petersburg - Tampa
Tampa - Tarpon Springs

Hillsborough (813), Pinellas/Pasco (727)

7-digit Local Calls

Clearwater
Hudson
New Port Richey
Plant City
St. Petersburg
Tarpon Springs
Zephyrhills

10-digit Local Calls

Tampa North - Tampa (Central, East, South, West)

7-digit EAS Calls

Clearwater - St. Petersburg
Clearwater - Tarpon Springs
Hudson - New Port Richey
New Port Richey - Tarpon Springs
Plant City - Tampa

10-digit EAS Calls

Clearwater - Tampa West
Tampa North - Zephyrhills

7-digit ECS Calls

Clearwater - New Port Richey
Hudson - Tarpon Springs
St. Petersburg - Tarpon Springs

10-digit ECS Calls

Clearwater - Tampa (Central, East, South, West)
New Port Richey - Tampa (North, West)
St. Petersburg - Tampa
Tampa - Tarpon Springs
Tampa (Central, East, South, West) - Zephyrhills