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November 17, 1999

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Ms. Blanca Bayo, Director  
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Room 110, Easley Building  
Florida Public Service Commission  
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Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

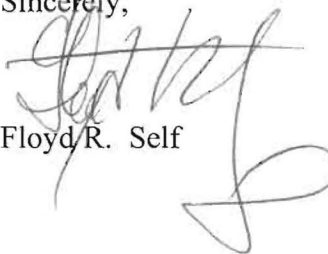
Dear Ms. Bayo:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services are an original and fifteen copies of the Direct Testimony of Richard Guepe in the above captioned dockets. An electronic copy of this testimony also is available on our website at <www.lawfla.com\website\documents.html>.

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

- AFA \_\_\_\_\_
  - APP \_\_\_\_\_
  - CAF \_\_\_\_\_
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  - CTR \_\_\_\_\_
  - EAG \_\_\_\_\_
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- cc: Tracy Hatch, Esq.  
Parties of Record

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DOCUMENT NUMBER-DATE  
14103 NOV 17 99  
FPSC-RECORDS/REPORTING

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for Review of Proposed Numbering Plan Relief for the 305/786 Area Code - Dade County and Monroe County/Keys Region	) ) ) ) ) ) ) )	Docket No. 990455-TL
<hr/>		
In re: Review of Proposed Numbering Plan Relief for the 561 Area Code	) ) ) ) ) ) ) )	Docket No. 990456-TP
<hr/>		
In re: BellSouth Telecommunications, Inc.'s Request for Review of Proposed Numbering Plan Relief for the 954 Area Code	) ) ) ) ) ) ) )	Docket No. 990457-TL
<hr/>		
In re: Review of Proposed Numbering Plan Relief for the 904 Area Code	) ) ) ) ) ) ) )	Docket No. 990517-TP Filed: November 17, 1999
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**DIRECT TESTIMONY OF RICHARD GUEPE**

**ON BEHALF OF**

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.**

**AND**

**AT&T WIRELESS SERVICES**

**November 17, 1999**

DOCUMENT NUMBER-DATE  
**14103 NOV 17 99**  
FPSC-RECORDS/REPORTING

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

2       A.   My name is Richard Guepe, and my business address is 1200 Peachtree  
3       Street, N.E., Atlanta, Georgia 30309. I am employed by AT&T as a District  
4       Manager in the Law & Government Affairs organization.

5       **Q.   BRIEFLY OUTLINE YOUR EDUCATIONAL BACKGROUND AND**  
6       **BUSINESS EXPERIENCE IN THE TELECOMMUNICATIONS**  
7       **INDUSTRY.**

8       A.   I received a Bachelor of Science Degree in Metallurgical Engineering in 1968  
9       from the University of Notre Dame in South Bend, Indiana. I received a  
10      Masters of Business Administration Degree in 1973 from the University of  
11      Tennessee in Knoxville, Tennessee. My telecommunications career began  
12      in 1973 with South Central Bell Telephone Company in Maryville,  
13      Tennessee, as an outside plant engineer. During my tenure with South  
14      Central Bell, I held various assignments in outside plant engineering,  
15      buildings and real estate, investment separations and division of revenues.  
16      At divestiture (1/1/84), I transferred to AT&T where I have held numerous  
17      management positions in Atlanta, Georgia, and Basking Ridge, New Jersey,  
18      with responsibilities for investment separations; analysis of access charges  
19      and tariffs; training development; financial analysis and budgeting; strategic  
20      planning; regulatory issues management; product implementation; strategic  
21      pricing; and docket management.

22      **Q.   HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE**

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**PUBLIC SERVICE COMMISSIONS?**

A. Yes, I have testified on behalf of AT&T in Florida, Alabama, Georgia, Mississippi, North Carolina, South Carolina, and Tennessee on product implementation issues, pricing issues, numbering issues, and policy issues.

**Q. ON WHOSE BEHALF ARE YOU APPEARING IN THESE PROCEEDINGS?**

A. I am appearing on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, a commercial mobile radio services (“CMRS”) provider, which have intervened in these dockets (which I will collectively refer to as “AT&T”).

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

A. The purpose of my testimony is to provide AT&T’s position concerning the issues identified in these proceedings, which involve adoption of the appropriate NPA relief plans for the 305/786, 561, 954, and 904 NPAs. My testimony supports the industry’s consensus relief plans for an overlay for each of the NPAs, and urges the Commission to adopt such plans consistent with their respective terms. As for the appropriateness of the Commission attempting to adopt specific number conservation measures in these dockets, the Commission should defer any such action to the work that the parties are now undertaking in Docket No. 981444-TP. Any number conservation measures the Commission may want to adopt should be implemented in a uniform and comprehensive basis consistent with industry guidelines. The

1 Commission has correctly begun the number conservation process in Docket  
2 No. 98144-TP, and reliance upon the work product of that docket is the best  
3 approach to resolving Florida's needs.

4 **Q. SHOULD THE COMMISSION APPROVE THE INDUSTRY'S**  
5 **CONSENSUS RELIEF PLANS FOR THE 305/786, 561, 954, AND 904**  
6 **NPAs? (Issue 1a)**

7 A. Yes. The rules for the development and adoption of NPA relief plans are  
8 very specific with respect to the process and requirements necessary for  
9 reaching an industry consensus for NPA relief. Since the industry has  
10 reached a consensus for an expanded overlay for 305 and a single all services  
11 distributed overlay for each of the other NPAs at issue in these consolidated  
12 proceedings, the Commission should approve these plans as filed since they  
13 are in the public interest.

14 **Q. IF THE COMMISSION DOES NOT APPROVE THE INDUSTRY'S**  
15 **CONSENSUS RELIEF PLAN FOR EACH OF THESE FOUR NPAs,**  
16 **WHAT ALTERNATIVE PLANS SHOULD BE ADOPTED FOR EACH**  
17 **NPA? (Issue 1b)**

18 A. We believe that the industry consensus relief plan for each NPA represents  
19 the best means of relief, and each should be adopted. In the event the  
20 Commission decides that it will not adopt those consensus relief plans, then  
21 at this time we would recommend the following alternatives with the caveat  
22 that any geographic split include an option for wireless carriers to grandfather

1 existing numbers (AT&T reserves its right to recommend in my rebuttal  
2 testimony a different alternative for any NPA in the event a better alternative  
3 emerges):

4 \* For the 305/786 NPA, there is no other reasonable alternative to the  
5 industry's proposed expanded overlay proposal. Quite simply, given the  
6 population of the Florida Keys, it would be inappropriate and wasteful of  
7 NPA resources to allocate a separate NPA to the Keys.

8 \* For the 561 NPA, we recommend Alternative 2 with Area A  
9 retaining 561.

10 \* In the 954 NPA, there is no reasonable alternative consistent with  
11 industry area code relief guidelines. The only appropriate relief methodology  
12 for the 954 NPA is an all services overlay.

13 \* For the 904 NPA, our first alternative would be the concentrated  
14 growth overlay identified as Alternative 2. If that were not adopted, we  
15 would recommend Alternatives 3 or 5 with Area A in either alternative  
16 retaining the 904 code.

17 **Q. WHAT NUMBER CONSERVATION MEASURE(S), IF ANY,**  
18 **SHOULD BE IMPLEMENTED IN THE 305/786, 561, 954, AND 904**  
19 **NPAs? (Issue 2a)**

20 **A.** In Docket No. 981444-TP this Commission has already begun the process to  
21 implement the number conservation measures that have been authorized by  
22 the FCC in its September 15, 1999 order. Given the efforts of the industry

1 and Commission to address the broad spectrum of number conservation  
2 measures authorized in Order No. FCC 99-249, it would be duplicative and  
3 potentially wasteful of limited time, money, and personnel to have the parties  
4 also attempt to develop conservation measures in these proceedings.

5 In the event the industry and Commission are unable to develop and  
6 implement number conservation measures in Docket No. 98144-TP, then the  
7 Commission should move forward with rate center consolidation, 1000s  
8 number block management, and number pooling for LNP-capable carriers.

9 **Q. IF CONSERVATION MEASURES ARE TO BE IMPLEMENTED,**  
10 **WHEN SHOULD THEY BE IMPLEMENTED? (Issue 2b)**

11 A. I would recommend that Commission undertake the necessary steps to  
12 implement rate center consolidation as soon as it can be designed and  
13 implemented. The 1000s block number management that has already been  
14 agreed to on a voluntary basis by a number of Florida code holders, including  
15 AT&T, can be implemented immediately, and would help prepare the code  
16 holders for number pooling. Number pooling for LNP capable carriers  
17 should be implemented consistent with the FCC's guidelines, preferably  
18 pursuant to a national schedule.

19 **Q. WHAT SHOULD BE THE DIALING PATTERN FOR LOCAL, TOLL,**  
20 **EAS, AND ECS CALLS FOR EACH OF THE NPAs AT ISSUE IN**  
21 **THESE PROCEEDINGS? (Issue 3)**

22 A. For each relief plan utilizing an overlay, 10 digit dialing should be required

1 for all landline local calls, EAS calls, and ECS calls, with 1+ 10 digit dialing  
2 being required for all landline toll calls. These actions would be consistent  
3 with prior Commission decisions and the FCC's requirements.

4 **Q. WHAT IS THE APPROPRIATE RELIEF PLAN IMPLEMENTATION**  
5 **SCHEDULE FOR EACH OF THE NPAs AT ISSUE IN THESE**  
6 **PROCEEDINGS? (Issue 4)**

7 A. Each relief plan should be implemented as stated in the industry  
8 recommendation, but in no event later than the anticipated exhaust date for  
9 each NPA.

10 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY.**

11 A. Dealing with area code exhaust and the implementation of area code relief  
12 plans can be a painful process for the public, industry, and the Commission.  
13 While the exhaust of NPAs to some extent has been hastened by historical  
14 network configuration requirements that may be less relevant today and  
15 number assignment policies that have proven less than efficient as new local  
16 competitors have attempted to enter the market, the Commission should  
17 nevertheless remember that its first obligation in these proceedings is to adopt  
18 a relief plan. The proposed industry consensus relief plans now before the  
19 Commission have been developed after much analysis, discussion, and  
20 experience and are fully compliant with the relevant NPA relief requirements.  
21 While progress is being made and will continue to be made in the area of  
22 number assignment and utilization policies, the best action the Commission



1                    can undertake in these dockets will be to implement the industry consensus  
2                    relief plans.

3                    **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4                    A.    Yes, it does.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Direct Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. in Docket No. 990455-TL has been furnished by Hand Delivery (\*) and/or U.S. Mail to the following parties of record this 17th day of November, 1999:

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\_\_\_\_\_  
Floyd R. Self

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Direct Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. in Docket No. 990456-TL has been furnished by Hand Delivery (\*) and/or U.S. Mail to the following parties of record this 178th day of November, 1999:

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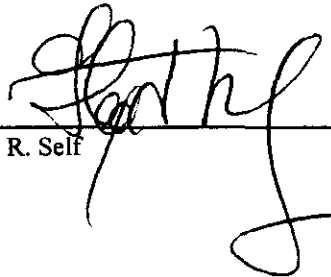
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A handwritten signature in black ink, appearing to read 'Floyd R. Self', is written over a horizontal line. The signature is stylized and cursive.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Direct Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. in Docket No. 990457-TL has been furnished by Hand Delivery (\*) and/or U.S. Mail to the following parties of record this 17th day of November, 1999:

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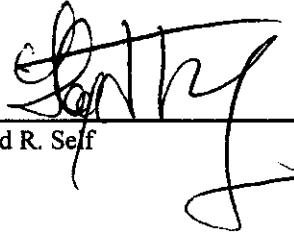
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## CERTIFICATE OF SERVICE

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