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June 23, 2000

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

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

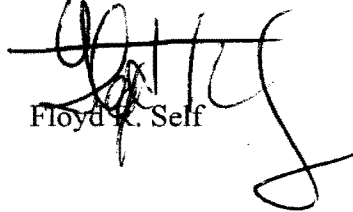
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. and MCI WorldCom, Inc. are an original and fifteen copies of the Joint Posthearing Brief in the above referenced dockets.

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 C. Self

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CAF \_\_\_\_\_  
CMP alleri  
COM 3  
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Enclosure  
cc: Marsha Rule, Esq.  
Donna Canzano, Esq.  
Parties of Record

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NPA, since a split does not require 10 digit local dialing or introduce potential infirmities to the development of an effectively competitive market. However, there are circumstances where a geographic split may not be appropriate, such as the 305/786 and 954 NPAs, where the consensus overlay relief plans should be adopted. MCI WorldCom has not intervened in the 904 NPA relief docket.

#### **E. ISSUES AND POSITIONS**

**1a. Should the Commission approve the industry's consensus relief plans for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

A. AT&T and MCI WorldCom Analysis: In the 305/786 NPAS, all of the parties to this docket support the consensus relief plan (Identified as Alternative #1 in Exhibit 9) for an expanded overlay. Since the industry has reached a consensus for NPA relief, and this consensus plan is the most practical and reasonable means of providing relief, consistent with the guidelines and the evidence of record, the Alternative #1 expanded overlay should be adopted. Guepe, direct 3; Brooks, direct 6-8; Greer, direct 3-4; Ludwikowski, direct 3.

B. AT&T Analysis: The Commission should approve the consensus relief plan (Identified as Alternative #1 in Exhibit 9) for an overlay in the 561 NPA. The rules for the development and adoption of NPA relief plans are very specific with respect to the process and requirements necessary for reaching a consensus for NPA relief. Since the industry has reached a

consensus for an overlay for the 561 NPA, it should be adopted. Guepe, direct 3; Greer, direct 3-4; Ludwikowski, direct 3.

B. MCI WorldCom Analysis: In the 561 NPA, the Commission should reject the consensus relief plan (Identified as Alternative #1 in Exhibit 9) for an overlay and instead adopt one of the geographic splits (Alternatives #2, #3, or #4), with alternative #2 being the best split alternative. Brooks, rebuttal 2. MCI WorldCom takes this position because a geographic split would preserve 7-digit dialing, especially given the fact that this NPA involves multiple counties, and best serve a competitive local exchange market. Brooks, direct 10-11; Brooks, rebuttal 1-2. There are no special circumstances that warrant an overlay for 561. Brooks, direct 11.

C. AT&T and MCI WorldCom Analysis: In the 954 NPA, all of the parties to this docket support the consensus relief plan (Identified as Alternative #1 in Exhibit 9) for an all services overlay. Since the industry has reached a consensus for NPA relief, and this consensus plan is the most practical and reasonable means of providing relief, consistent with the guidelines and the evidence of record, the Alternative #1 overlay should be adopted. Guepe, direct 3; Brooks, 8-10; Greer, direct 3-4; Ludwikowski, direct 3. Particularly with respect to the 954 NPA, any of the geographic split or split-overlay alternatives would involve senseless and impractical divisions within Broward County. For example, several of the alternatives would carve the Ft. Lauderdale exchange out from the rest of the county, inappropriately split rate centers, or create unbalanced lives. Brooks, direct 8. Moreover, all of the other plans would require county-wide 10-digit dialing or a combination of 7-digit and 10-digit dialing that would be terribly too confusing for the people living and working in Broward County. Guepe, rebuttal 1-2; Greer, rebuttal 9-12. When you get

to the point where there is a single NPA for a county, and the county essentially constitutes a single community, such as Broward County, an overlay is the only appropriate relief measure.

D. AT&T Analysis: The Commission should approve the consensus relief plan (Identified as Alternative #1 in Exhibit 9) for an overlay in the 904 NPA. The rules for the development and adoption of NPA relief plans are very specific with respect to the process and requirements necessary for reaching a consensus for NPA relief. Since the industry has reached a consensus for an overlay for the 904 NPA, it should be adopted. Guepe, direct 3; Greer, direct 3-4; Eudy, direct 2-6; Eudy, rebuttal 1-9; Khazraee, direct 2; Ludwikowski, direct 3; Nobles, direct 3-4.

D. MCI WorldCom Analysis: For the 904 NPA, MCI WorldCom has no position because it did not intervene in this docket.

**1b. If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

A. AT&T and MCI WorldCom Analysis: In the 305/786 NPAs, there is no other reasonable alternative. Guepe, direct 3-4; Greer, rebuttal 13-15.

B. AT&T Analysis: The industry consensus relief plan for the 561 NPA represents the best means of relief, and the consensus relief plan should be adopted. In the event the Commission rejects the consensus relief plan, the Commission should adopt Alternative 2 with Area

A retaining 561. Guepe, direct 4.

B. MCI WorldCom Analysis: Any of the other proposed splits that have fairly balanced relief lives and otherwise meet the FCC's requirements would be acceptable. Brooks, direct 11.

C. AT&T and MCI WorldCom Analysis: In the 954 NPA, there is no other reasonable alternative. Guepe, direct 3-4; Greer, rebuttal 9-12.

D. AT&T Analysis: The industry consensus relief plan for the 904 NPA represents the best means of relief, and it should be adopted. In the event the Commission rejects the consensus relief plan, the concentrated growth overlay identified as Alternative #2 should be adopted. If that were not adopted, Alternatives #3 or #5, with Area A in either alternative retaining the 904 code present reasonable alternatives for retaining 7-digit dialing. Guepe, direct 4.

D. MCI WorldCom Analysis: For the 904 NPA, MCI WorldCom has no position because it did not intervene in this docket.

**2a. What number conservation measure(s), if any, should be implemented for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T and MCI WorldCom Analysis: This Commission has undertaken several significant measures to advance and improve telephone number conservation in Florida. First, in the non-

protested portions of Order No. PSC-00-0543-PAA-TP, issued March 16, 2000, the Commission approved number reclamation, criteria for obtaining initial numbering resources, and began the process of verifying and reconciling numbering resource information available from different sources. Then, on May 30, 2000, in Order No. PSC-00-1046-PAA-TP, the Commission approved a modified and revised number pooling plan for the 954, 561, and 904 NPAS that by April of 2001 will have 1000s number block pooling in effect in Broward, Palm Beach, Duval, Clay, Nassau, and St. Johns counties. Before any other southeastern state has begun the first implementation of number pooling, Florida will have it underway in three of its most populous MSAS. \*\*

The measures begun by these two Commission orders should most certainly help prolong the existing lives of these three NPAS. However, with these actions completed, the Commission should complete the process begun in Docket No. 981444-TP, and continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC in Order No. FCC 99-249 consistent with the requirements of Florida law and the further requirements and guidelines adopted by the FCC in Order No. FCC 00-104. Guepe, rebuttal 2-3; Darnell, direct 3-16; Darnell, rebuttal 2-5; Greer, direct 4-5; Ludwikowski, direct 4-35; Nobles, direct 4-5.

**2b. If the conservation measures are to be implemented, when should they be implemented?**

- A) 305/786
- B) 561
- C) 954

**D) 904**

AT&T and MCI WorldCom Analysis: The number conservation measure contained within the non-protested portions of Order No. PSC-00-0543-PAA-TP have already been started. For example, a number of NXX codes have been or are in the process of being returned, which helps the availability of NXX codes for each NPA experiencing the return of such codes. Likewise, the process of implementing the number pooling adopted by Order No. PSC-00-1046-PAA-TP is also already underway, and the Commission should continue to follow the implementation schedule developed through that process. The remaining number conservation measures identified in should be worked on through the process previously agreed to in Docket No. 981444-TP. Guepe, 4-5; Darnell, direct 2-3; Eudy, direct 6;

**3. What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

AT&T and MCI WorldCom Analysis: Dialing patterns for local, toll, EAS, and ECS calls generally should be the same today as they are after relief is implemented, with two exceptions. For each relief plan utilizing an overlay, 10 digit dialing should be required for all landline local calls, EAS calls, and ECS calls without IXC competition, with 1+ 10 digit dialing being required for all landline toll calls and ECS calls with IXC competition. In the case of a geographic split, the area



code must also be dialed when calls are placed across NPA boundaries. These actions would be consistent with prior Commission decisions and the FCC's requirements. Guepe, direct 5-6; Brooks, direct 11; Greer, direct 4; Eudy, direct 6-7; Greer, rebuttal 6-7; Nobles, direct 5.

**4. What is the appropriate relief plan implementation schedule for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T and MCI WorldCom Analysis: Each relief plan should be implemented as stated in the industry recommendation. Guepe, direct 6; Exhibit 9, Foley Direct Exhibits. These implementation schedules should be prioritized by exhaust dates, but in no event should the implementation schedule be set in a manner where the NPA would be exhausted before the relief plan is fully implemented. Brooks, direct 12; Eudy, direct 7.

The number conservation measures adopted by the Commission in the non-protested portions of Order No. PSC-00-0543-PAA-TP and in Order No. PSC-00-1046-PAA-TP should serve to extend the current projected exhaust dates for these NPAS. In such a situation, the start of the area code relief implementation schedule for these NPAS may be postponed if there is a credible, reasonable basis to extend such that the new schedule would use the same implementation schedule beginning only at a later date.

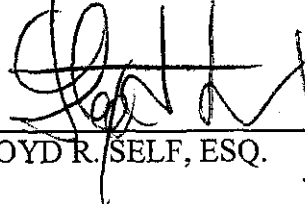
In view of the fact that the number conservation measures already adopted may serve to

extend to life of these NPAS, the Commission has two choices. First, it can proceed to implement the area code relief plan for each NPA and ignore the fact that the conservation measures could extend the life of these NPAS. In this situation, the relief implementation would be that set forth for each plan on the basis of the existing information as to the projected exhaust dates in the record. Such immediate adoption would best fulfill the Commission's obligations to order area code relief, improve the success of the pooling (in those MSAS where pooling is being implemented), and provide the most immediate end to the rationing of numbers now underway in these NPAS, which serves to limit competition because of the artificial limits placed on telephone number acquisition and availability. Immediate implementation would be the preferred course, and especially is the preferred course of the 904 residents if the relief ordered is a geographic split. Greer, rebuttal, 17-18; Exhibit 8, Greer Deposition, at 56-60.

Alternatively, the Commission could monitor the effects of its present and any later adopted conservation measures to determine if the exhaust dates for these NPAS could be extended. In such a case, the Commission would be required to constantly monitor the number utilization data (both on an NXX and a 1000s block basis), and prepare quarterly, if not monthly, revised projections. This process may also require monthly, but at least quarterly, meetings to track and adjust the implementation start date, based upon the ultimate relief ordered (a split or an overlay). Greer, rebuttal 17-18; Exhibit 8, Greer Deposition, at 56-60; Exhibit 6, Foley Deposition, at 24-27. This process would require much closer coordination and significant additional work on the part of the Commission and the industry to ensure that we don't run out of numbers before the relief plan can be fully and finally implemented.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Joint Posthearing Brief of AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. , and MCI WorldCom, Inc. in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL has been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 23rd day of June, 2000.

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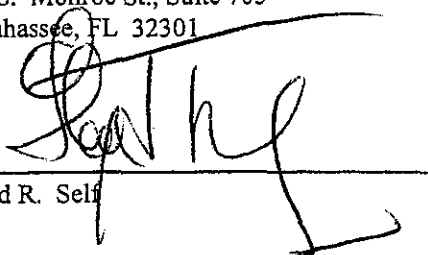
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