

Exhibit No.: ____
Issue: NANP Petition
and Related Issues
Witness: John C. Rollins
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: GTE Midwest Incorporated
Case No.: TO-2000-374
Date Testimony Prepared: June 23, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JUN 23 2000

IN RE:

THE MATTER OF AN)
INVESTIGATION INTO THE)
EXHAUSTION OF CENTRAL OFFICE)
CODES IN THE 314 AND 816)
NUMBERING PLAN AREA)

CASE NO. TO-2000-374

Missouri Public
Service Commission

REBUTTAL TESTIMONY

OF

JOHN C. ROLLINS
SENIOR PLANNING MANAGER
NETWORK PLANNING

ON BEHALF OF

GTE MIDWEST INCORPORATED

June 23, 2000

1 **REBUTTAL TESTIMONY OF JOHN C. ROLLINS**

2

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is John C. Rollins. My business address is GTE Network
5 Services, 545 East John Carpenter Freeway, Irving, Texas 75062.

6

7 **Q. ARE YOU THE SAME JOHN ROLLINS THAT PREVIOUSLY FILED**
8 **DIRECT TESTIMONY IN THIS CASE?**

9 A. Yes.

10

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

12 A. I will respond to issues raised in the direct testimony of Office of Public
13 Council (OPC) witness Ms. Barbara Meisenheimer.

14

15 **Q. DO YOU AGREE WITH MS. MEISENHEIMER'S STATEMENT (PAGE**
16 **13) THAT CODE ASSIGNMENTS MIGHT RISE BECAUSE CARRIERS**
17 **WILL "STOCK UP" PRIOR TO THE FCC ORDER TAKING EFFECT?**

18 A. No. GTE is not convinced the FCC order will have any impact on code
19 assignments. However, if there is any impact at all, GTE would expect to
20 see a slight short-term decline in the number of NXX codes that carriers
21 request followed by a return to past levels because the FCC order
22 provides a very limited time period during which a carrier can hold a code
23 without having numbers assigned. If carriers were to request codes
24 ahead of time, they would just have more codes that could be reclaimed

1 because the codes had been vacant for over sixty days. The new FCC
2 requirements will force carriers to attempt to schedule their need for codes
3 on much shorter time intervals, will inhibit customers ability to know the
4 numbers they will be assigned ahead of time but should not encourage
5 "stocking up."

6
7 **Q. DOES GTE CURRENTLY HOLD VACANT NXXS IN THE 314, 636 OR**
8 **816 NUMBERING PLAN AREAS ("NPA")?**

9 A. No. GTE currently has no vacant NXX codes in these three NPAs and
10 has never made it a practice to order codes for which it has no immediate
11 use.

12
13 **Q. DO YOU AGREE WITH MS. MEISENHEIMER'S CONTENTION THAT**
14 **SOME CODES IDENTIFIED AS UNAVAILABLE IN THE 816 NPA**
15 **"SHOULD SOON BE AVAILABLE FOR ASSIGNMENT?"**

16 A. No. While I agree that 66 "unidentified use" NXXs seems to be high (as
17 reflected in Ms. Meisenheimer's Table 2), there may be legitimate reasons
18 for this. I verified that the June 2000 Local Exchange Routing Guide
19 ("LERG") now shows 57 "unidentified use" NXXs, of which two have an
20 identified July 2000 effective date. Therefore, I recommend that any
21 questions regarding this issue be referred to the North American
22 Numbering Plan Administrator ("NANPA") for further review to determine if
23 a change in the projected exhaust date is warranted.

1 Q. WHAT ARE YOUR VIEWS OF MS. MEISENHEIMER'S TESTIMONY
2 (PAGE 14) CONCERNING HER REVISED EXHAUST PROJECTIONS?

3 A. It would appear that Ms. Meisenheimer used NANPA's recently updated
4 projections as of January 18, 2000 as a starting point to project the
5 exhaust dates for the 314 and 816 NPAs. I agree with Ms. Meisenheimer
6 that developing a projection for exhaust is "a difficult question." However,
7 I do not agree with the additional reductions listed in tables 3.1 and 3.2 of
8 her testimony and would state that any adjustments should be the result of
9 NANPA analysis.

10
11 As a demonstration of how difficult the job of forecasting projected exhaust
12 dates can be, on page 13, Ms. Meisenheimer estimates that 17 to 33
13 codes in the 816 NPA can be reclassified and on page 14, she changes
14 the assumption to 43. I also note that recapturing 17 codes in the 816
15 NPA would only extend the life by only 2.4 months (17 / 7 codes per
16 month) and not the 24 months Ms. Meisenheimer claims on page 12.

17
18 Q. DO YOU HAVE ANY OTHER OBSERVATIONS REGARDING MS.
19 MEISENHEIMER'S PROJECTIONS?

20 A. Yes. Ms. Meisenheimer's recommendations and projections do not
21 support postponing the development of a relief plan for either the 314 or
22 816 NPA. Regardless of which numbers are used, the changes
23 recommended by Ms. Meisenheimer with regard to the 314 NPA only

1 result in extending the exhaust date by three months. I also do not believe
2 that sufficient information is available to adopt Ms. Meisenheimer's
3 recommendation to shift the NANPA estimated code demand downward
4 from 10.2 to 7. Even if her assumption that 43 codes were able to be
5 recovered in the 816 NPA was correct, at a rate of 10.2 per month, the
6 exhaust date would only be extended about four months, from November
7 2001 to February or March of 2002.

8
9 GTE submits that relief plans should be put in place for both NPAs now
10 and, if they materialize, the additional three or four months estimated by
11 Ms Meisenheimer can be used for customer education and
12 implementation.

13
14 **Q. DO YOU HAVE ANY COMMENTS CONCERNING MS.**
15 **MEISENHEIMER'S NUMBER UTILIZATION SURVEY?**

16 **A.** Yes. The use of utilization percentages in Table 4.1 is misleading. The
17 calculations result in generally lower utilization rates in less densely
18 populated areas and in those areas where MCA is available. These
19 results are merely functions of the size of the exchanges and the
20 geographic areas served by switches and do not imply that carriers are
21 misusing numbers. In addition, newly assigned codes should not be
22 expected to have high utilization. Therefore, any analysis using utilization
23 rates can be misleading unless much more analysis is performed.

1 **Q. DO YOU AGREE WITH MS. MEISENHEIMER'S CHARACTERIZATION**
2 **THAT OVERLAYS STIGMATIZE NEW BUSINESS AND NEW LOCAL**
3 **SERVICE PROVIDERS?**

4 A. No. With all the activity in numbering today, GTE does not believe that
5 any stigma exists. Even if it did exist, all carriers would be equally
6 affected regardless of whether an NPA split or overlay were implemented.
7 While GTE does not agree with Ms. Meisenheimer's characterization, one
8 side benefit to the retroactive overlay plan is that it stigmatizes no one
9 because both NPA codes are more evenly distributed between CLECs
10 and LECs and old and new customers, since the 636 NPA has already
11 been deployed.

12
13 **Q. MS. MEISENHEIMER STATES (PAGE 29) THAT A RETROACTIVE**
14 **OVERLAY WOULD TREAT CUSTOMERS IN THE 636 AREA CODE**
15 **"UNREASONABLY AND UNFAIRLY" AND IS NOT PREFERABLE TO**
16 **AN OVERLAY OF THE 314 NPA. DO YOU AGREE?**

17 A. No. Far from being unfair, the use of a retroactive overlay would insure
18 more efficient utilization of the numbering resource. Additionally, since
19 customers are already familiar with the two NPAs and are used to dialing
20 ten digit numbers for calls between the codes, the transition to the overlay
21 and the conversion to ten digit dialing will be even easier for customers to
22 adapt to. GTE's experiences in Houston and Dallas support this position.

1 **Q. WHAT ARE THE IMPLICATIONS TO POOLING IF A RETROACTIVE**
2 **OVERLAY IS DEPLOYED?**

3 A. The additional 4.4 years projected by NANPA should allow the industry
4 time to implement number pooling in both the 314 and 636 area codes
5 serving the same geographic area. In turn, the St. Louis area should
6 continue to require only two area codes for many years to come. An
7 additional benefit is that the third NPA that would not be needed in this
8 region would be available to extend the overall life of the North American
9 Numbering Plan ("NANP" or "Plan") including the period of time before the
10 Plan is required to be expanded to more than 10 digits. The FCC pointed
11 out in paragraph 161 of its recent order that pooling would be required in
12 both area codes simultaneously in an overlay situation, whereas pooling
13 would have to be implemented separately if NPA splits are deployed.

14
15 **Q. ARE YOU ENCOURAGED BY MS. MEISENHEIMER'S**
16 **ACKNOWLEDGEMENT OF THE BENEFITS OF DEPLOYING**
17 **OVERLAYS COMPARED TO NPA SPLITS (PAGE 31)?**

18 A. Yes. GTE is encouraged by the fact that Ms. Meisenheimer now
19 recognizes the benefits of the overlay approach and the problems that
20 area code splits cause for customers. It now appears that GTE and the
21 OPC are only in disagreement over the geographic scope of an overlay.

1 Q. DO YOU AGREE WITH MS. MEISENHEIMER THAT IMPLEMENTATION
2 OF RELIEF SHOULD BE DELAYED UNTIL THE AVAILABLE CODES
3 FALL BELOW 90 IN THE 314 NPA AND BELOW 100 IN THE 816 NPA
4 (PAGE 30-31)?

5 A. No. The uncertainty associated with this approach places a hardship on
6 customers and carriers alike. It is GTE's position that a specific time line
7 should be identified and ordered for relief in both area codes. A schedule
8 would insure that if demand increases in excess of the current forecast,
9 customers and carriers would experience the least amount of harm. That
10 is, the time frame during which numbers would not be available would be
11 kept to a minimum. GTE is concerned that the possible administrative
12 delays that could be experienced if Ms. Meisenheimer's approach were
13 adopted would result in relief being delayed to the point where carriers are
14 unable to obtain resources. GTE notes that the FCC orders require that:

15 "A state commission may order rationing only if it has ordered relief
16 and established an implementation date, and the industry is unable
17 to agree on a rationing plan. If the state commission has not yet
18 chosen a relief method and established a relief date, the NXX code
19 administrator and the industry should devise the jeopardy
20 conservation or rationing measures, consistent with current industry
21 practice. We encourage the state commissions to participate in the
22 discussions on the rationing plan through attendance at industry
23 meetings, but a state commission may not impose a rationing plan
24 on its own to avoid making a decision on area code relief." (FCC
25 98-224, *Memorandum Opinion And Order And Order On*
26 *Reconsideration*, September 28, 1998 at ¶25.)
27

28 Therefore, operating in a jeopardy situation without a selected date for
29 NPA relief is counter to the FCC's past order.
30

1 Q. DOES GTE HAVE ANY SPECIFIC COMMENTS CONCERNING THE
2 USE OF AREA CODE SPLITS ARRANGED ALONG GEOGRAPHIC
3 BOUNDARIES (PAGE 32)?

4 A. GTE cautions that if a split is ordered, care should be taken to insure that
5 existing rate centers and exchange boundaries are not split by relief
6 action. A strict adherence to a geographic boundary has resulted in
7 creating customer problems. Past experience in other states has shown
8 that if care is not taken, some customers may be required to take full ten
9 digit number changes rather than just having to change the NPA.

10
11 Q. DOES GTE SUPPORT THE USE OF SERVICE SPECIFIC OR
12 TECHNOLOGY SPECIFIC OVERLAYS

13 A. No. Ms. Meisenheimer recommends that the Commission "actively
14 pursue the option of implementing a wireless overlay by encouraging the
15 FCC reconsideration and by requesting delegated authority in this area as
16 other states have done." Since 1995 (See Proposed 708 Relief Plan and
17 630 Numbering Plan Area Code by Ameritech – Illinois, *Declaratory Ruling*
18 *and Order*, 10 FCC Rcd 4596, 4608, 4610-12 (1995) (*Ameritech Order*)),
19 the FCC has consistently held that service specific overlays (those
20 dedicated to a particular industry segment) are anti-competitive and not
21 appropriate.

22 "At this time, we do not address issues raised in the Notice
23 regarding audits, rate center consolidation, ten-digit dialing, and the
24 use of technology specific overlays. We emphasize that in the
25 interim, our existing rules and policies with respect to these

1 optimization measures (including the prohibition on technology-
2 specific area code overlays) remain in effect." (FCC-00-104,
3 Released March 31, 2000, at ¶9.)
4

5 This includes the FCC's response to other states' requests for the interim
6 authority Ms. Meisenheimer suggests. If implemented, this approach would
7 result in an inefficient utilization of the scarce resource of numbers
8 comprised in the NANP. Therefore, GTE would view such action as a
9 waste of Commission resources and not an appropriate use of the
10 numbering resources.
11

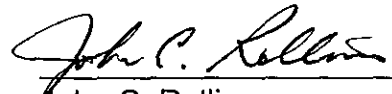
12 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

13 **A.** Yes, it does.

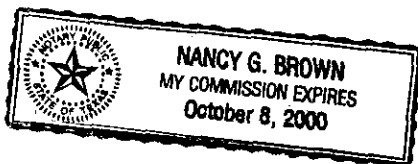
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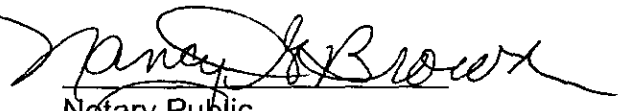
STATE OF TEXAS)
) ss.
COUNT OF DALLAS)

On this 19th day of June, 2000, before the undersigned Notary Public appeared John C. Rollins, Senior Planing Manager of GTE Network Services, who states the information contained herein is true and accurate to his knowledge and belief.


John C. Rollins

Suscribed and sworn to before me this 19th day of June, 2000.




Notary Public

My Commission Expires: 10-8-2000