

FILED²
JUN 23 2000
Missouri Public
Service Commission

Exhibit No:
Issues:
Witness: Steve Dreon
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Southwestern Bell Wireless, Inc.
Case No: TO-2000-374

**IN THE MATTER OF
THE PETITION OF THE NORTH AMERICAN
NUMBERING PLAN ADMINISTRATOR, ON
BEHALF OF THE NUMBERING TELECOMMUNICATIONS
INDUSTRY, FOR APPROVAL OF NPA RELIEF PLAN
FOR THE 314 AND 816 AREA CODES**

REBUTTAL TESTIMONY

OF

STEVE DREON

St. Louis, Missouri
June, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI


In the Matter of the Petition of the North)
American Numbering Plan Administrator, on)
Behalf of the Missouri Telecommunications)
Industry, for Approval of NPA Relief Plan for) Case No. TO-2000-374
the 314 and 816 Area Codes)

AFFIDAVIT OF STEVE DREON

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)


I, Steve Dreon, of lawful age, being duly sworn, depose and state:

1. My name is Steve Dreon and I am presently Director-Network Operations.
2. Attached hereto and made part hereof for all purposes is my Rebuttal Testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.



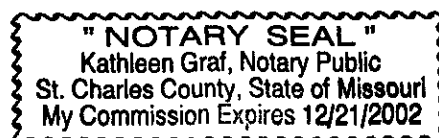
Steve Dreon

Subscribed and sworn to before me this 22nd day of June, 2000.



Notary Public

My Commission Expires: 12-21-02



**REBUTTAL TESTIMONY OF STEVE DREON
ON BEHALF OF SOUTHWESTERN BELL WIRELESS, INC.
CASE NO. TO-2000-374**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Steve Dreon and my business address is 892 Woods Mill Road,
Ballwin, Missouri 63011.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Southwestern Bell Wireless, Inc. (SWBW). My title is Director-
Network Operations.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I have a Master of Science – Electrical Engineering from the University of Missouri
in Rolla, Missouri and a Bachelor of Science in Electrical Engineering and
Computer Engineering from the University of Missouri in Columbia, Missouri.

**Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE IN THE
TELECOMMUNICATIONS INDUSTRY?**

A. I have been working in the area of telecommunications since October, 1990. For 6
years I worked for Ericsson Mobile Communications working on mobile
communications products. I have been employed with SWBW since October,
1996. I am responsible for the wireless network in St. Louis and Kansas City.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

1 A. The purpose is two-fold. First, to recommend that the Commission adopt the
2 industry recommendation of a retroactive all services overlay for the 314/636 area
3 and an all services overlay for the 816 area. Second, to respond to the suggestion
4 that the Commission consider adopting a "wireless overlay", raised by Ms. Barbara
5 A. Meisenheimer in her Direct Testimony.

6
7 **Q. PLEASE ELABORATE ON SWBW'S POSITION THAT A RETROACTIVE ALL**
8 **SERVICES OVERLAY BE ADOPTED FOR THE 314/636 AREA AND AN ALL**
9 **SERVICES OVERLAY BE ADOPTED FOR THE 816 AREA.**

10 A. SWBW agrees that the most efficient form of area code relief for the 314 area is a
11 retroactive all services overlay, where the present 314/636 split boundary line is
12 erased and two NPAs, i.e., 314 and 636, will co-exist in the same geographical
13 area. This approach was taken in the Dallas (214/972) and Houston (713/281)
14 areas in the 1998-1999 timeframe with excellent results. If the Commission
15 decides against the retroactive all services overlay approach, SWBW also
16 supports an all services overlay over the 314 NPA.

17
18 SWBW also supports the industry recommendation to relieve the 816 area via an
19 all services overlay. The overlay option, retroactive or not, is the best long term
20 solution for both the St. Louis and Kansas City areas in that no existing customers
21 will undergo a telephone number change and a consistent 10-digit dialing pattern
22 will exist in the overlaid areas. Once the overlays are in place, future relief can
23 occur without incident in that no telephone numbers will change and no dialing
24 patterns will change.

1 **Q. DOES SWBW AGREE THAT THE COMMISSION SHOULD CONSIDER**
2 **ADOPTING A "WIRELESS OVERLAY" INSTEAD OF AN "ALL SERVICES**
3 **OVERLAY" AS THE METHOD OF BACK-UP RELIEF?**

4 **A.** Most certainly not. First, as Ms. Meisenheimer's Direct Testimony acknowledges,
5 the FCC currently prohibits (and has historically prohibited) the use of technology
6 specific overlays. I am not a lawyer and I am not going to attempt to give a legal
7 interpretation of FCC decisions, but it is my understanding that the FCC, on
8 multiple occasions, set out its belief that technology specific overlays, such as a
9 wireless overlay, would segregate only particular types of telecommunications
10 services or particular types of telecommunications technologies in discrete area
11 codes so as to be unreasonably discriminatory and would unduly inhibit
12 competition.

13
14 Second, even assuming that the FCC would decide to remove its current
15 prohibition on technology specific overlays, SWBW submits that a "wireless
16 overlay" would provide insufficient relief.

17
18 **Q. ASSUMING THAT THE FCC LIFTED ITS CURRENT PROHIBITION AGAINST**
19 **TECHNOLOGY SPECIFIC OVERLAYS, AND THE MISSOURI PSC ORDERED**
20 **WIRELESS-ONLY OVERLAYS FOR THE 314 AND 816 NPAs, WHY WOULD**
21 **THIS METHOD PROVIDE INSUFFICIENT RELIEF?**

22 **A.** SWBW's analysis reveals that, within the 314 NPA, there are currently 196
23 wireless NXXs (i.e., NXXs associated with traditional cellular, PCS and paging
24 services) and within the 816 NPA there are currently 126 wireless NXXs. Over the
25 past 30 months, a total of 59 wireless NXXs have been assigned in the 314 NPA,

1 i.e., an average of slightly less than 2 NXXs per month, and a total of 44 wireless
2 NXXs have been assigned in the 816 NPA, i.e., an average of just under 1.5 NXXs
3 per month.

4
5 Since the wireless industry's total needs in both NPAs over the past 2 ½ years
6 have been in the range of 1.5 to 2 NXXs per month, creating a wireless only NPA
7 would not result in any significant relief for either area code. First, in considering a
8 wireless overlay on a prospective basis, valuable NPA resources would be
9 allocated to an industry that, currently, makes insubstantial demands upon the
10 state's NXX resources and, therefore, has a minor impact upon NPA exhaustion.
11 Accordingly, allocation of NPA resources to an industry that entails such minute
12 growth arguably does not provide significant "relief" to the problem of NPA
13 exhaustion. It follows, therefore, that placing the minimal NXX demands of the
14 wireless industry in a new NPA would do little or nothing to delay the exhaustion of
15 the 314 and 816 NPAs. My best estimate is that a wireless overlay would create a
16 delay of only 1-3 months at best in each NPA. Additionally, a wireless overlay
17 would necessitate the use of two new NPAs that would not "fill up" for 30+ years,
18 an arguable waste of valuable NPA resources.

19
20 Second, when considering a wireless overlay retrospectively (with the "take-back"
21 of all existing wireless NXXs), the wireless industry would incur substantial costs,
22 both financially and in terms of customer inconvenience. Given that, currently,
23 there are 322 wireless NXXs associated with the 314 and 816 NPAs, there are
24 3,220,000 potential wireless telephone numbers associated with the NXXs. With a
25 conservative estimate of a 50% utilization rate, this would result in over 1.6 million

1 subscribers in the St. Louis and Kansas City areas who would be forced to change
2 their wireless numbers (as well as forced to dial 10 digits on all calls while landline
3 customers could still dial 7 digits for local intra-NPA calls). SWBW estimates that
4 the required handset re-programming associated with these mandated number
5 changes would cost \$25 to \$50 per subscriber, amounting to approximately a \$40
6 to \$80 million cost to the wireless industry. The wireless industry would incur these
7 substantial costs despite the fact that it uses its numbering resources as efficiently,
8 or more efficiently, than any other industry segment and consumes only small
9 amounts of NXXs per month, and therefore plays a small role in the current NPA
10 exhaustion.

11
12 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

13 A. First, SWBW recommends the adoption of the industry's recommendation to
14 retroactively overlay the 314/636 areas and to overlay the 816 NPA. As a fallback,
15 SWBW supports an all services overlay for the 314 NPA. Second, in the event the
16 FCC overrules its previous rulings that prohibit technology-specific overlays, the
17 actual deployment of wireless-only overlays would result in insubstantial relief if
18 done on a prospective basis and massive industry costs and widespread customer
19 inconvenience if done retrospectively.

20
21 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE MISSOURI PUBLIC**
22 **SERVICE COMMISSION?**

23 A. Yes.
24
25

Rebuttal Testimony of
Steve Dreon

1 | **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

2 | **A. Yes.**