

Exhibit No.:

Issues:

Witness:

Type of Exhibit:

Sponsoring Party:

Case No.:

816 overlay and number conservation

Thomas W. White

Rebuttal Testimony

ExOp of Missouri, Inc.

TO-2000-374

FILED²

JUN 23 2000

**Missouri Public
Service Commission**

EXOP OF MISSOURI, INC.

CASE NO. TO-2000-374

REBUTTAL TESTIMONY

OF

THOMAS W. WHITE

Jefferson City, Missouri

June 22, 2000

1 **Q. Please state your name and business address.**

2 A. My name is Thomas W. White. My business address is ExOp of Missouri, Inc., 303
3 North Jefferson, Kearney, Missouri 64060.

4 **Q. In what capacity are you employed by ExOp of Missouri, Inc.?**

5 A. I am the President of ExOp of Missouri, Inc. ("ExOp"). As President I have both general
6 and direct oversight over the management and regulatory issues that affect ExOp's
7 business.

8 **Q. Please summarize your professional background.**

9 A. I have worked for approximately the past 25 years in various capacities in the electrical
10 utility and telecommunications industries. During the course of those 25 years, I have
11 started and operated a number of different companies, including ExOp, which I founded
12 in 1996 to bring a fully facilities-based alternative to telephone service in rural cities in
13 the state of Missouri.

14 **Q. Have you previously given testimony before this Commission?**

15 A. Yes. I testified before the Commission in the case involving ExOp's application to be
16 certificated to provide basic local telecommunications service in the state.

17 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

18 A. The purpose of my testimony is to add the views and insights of ExOp, as a fully
19 facilities-based competitive local exchange carrier ("CLEC") operating in Kearney,
20 Missouri, to those which have been expressed by the other parties to the case. As a fully
21 facilities-based CLEC, ExOp has a somewhat different set of concerns from the other
22 CLECs and ILECs operating in Missouri.

23 **Q. What is ExOp's general position on area code relief and number conservation?**

24 A. ExOp currently provides service only in the Kearney exchange but is planning to expand

1 into Platte City in the near future; thus, ExOp's comments only pertain to the 816 NPA.
2 Recognizing the need for additional NXXs throughout the 816 NPA, ExOp supports the
3 proposed all-services overlay for the 816 NPA. If the Commission adopts the proposed
4 overlay plan, it will avoid the disruption that would be caused by splitting the 816 area
5 code. ExOp believes number conservation should proceed alongside, not in place of, the
6 overlay plan. In preparing to extend its system to Platte City, ExOp is working out the
7 details of continuing to use its Kearney NXX codes for both Kearney and Platte City.
8 ExOp favors this and other forms of rate center consolidation as one number conservation
9 strategy that should be pursued broadly in the industry on an ongoing basis.

10 **Q: Why is ExOp in favor of the all-services overlay option in the 816 NPA?**

11 **A:** The other parties in their direct testimony have done a good job of outlining the
12 advantages and disadvantages of the proposed overlay as compared with a geographic
13 NPA split. While both methods would provide additional NXXs, the overlay can be
14 implemented faster than a split, and ExOp's customers will benefit greatly from not being
15 required to change telephone numbers if a new NPA is overlaid in the geographic area
16 currently covered by the 816 NPA. The only noteworthy disadvantage to the overlay
17 plan is that it will require 10-digit dialing throughout the NPA. ExOp's customers have
18 already begun to become acclimated to dialing 10 digits because all of their calls to local
19 numbers on the Kansas side of the state line have been 10-digit calls for several months.
20 ExOp urges the Commission to adopt the overlay as the better of the two area code relief
21 alternatives in the 816 NPA.

22 **Q: Can you explain further the steps ExOp has taken toward rate center consolidation**
23 **as it expands from Kearney into Platte City?**

24 **A:** In the ordinary sense, rate center consolidation refers to two or more existing rate centers

1 being consolidated into one, thus freeing up the additional NXXs assigned to the multiple
2 rate centers. Of course, ExOp, with its current business being confined to the Kearney
3 exchange, does not have multiple rate centers to consolidate. When ExOp extends its
4 network into Platte City, the normal course of business would be for ExOp to establish
5 Platte City as a separate rate center and to apply for two additional NXXs (one for
6 metropolitan calling area ("MCA") subscribers and the other for non-MCA subscribers).
7 Rather than tying up two additional NXXs when its existing NXXs are far from depleted,
8 ExOp is planning to continue to use its current NXXs for customers located in both
9 Kearney and Platte City and, thus, to treat both cities as a single rate center.

10 **Q: What steps has ExOp taken to determine the feasibility of its one-rate-center plan?**

11 A: ExOp has been dealing with representatives from Southwestern Bell Telephone
12 Company, Sprint Missouri, Inc. and the MidAmerica Regional Council, all of whom have
13 confirmed the technical feasibility of ExOp's plan. Two principal issues have emerged:
14 9-1-1 and local number portability ("LNP"). All of the 9-1-1 issues have been resolved
15 and will not pose any problem when ExOp expands into Platte City. LNP will only be an
16 issue if Sprint, which is the incumbent in both the Kearney and Platte City exchanges,
17 questions whether they are required to provide LNP to ExOp's customers in both
18 exchanges when ExOp's switch is located only in the Kearney exchange. There is no
19 technical reason this should pose a problem; the only potential problem would be a
20 contractual one.

21 **Q: What is ExOp's position on Thousand Block Number Pooling?**

22 A: ExOp agrees with a number of the other parties to this case that Thousand Block Number
23 Pooling will not solve the area code relief problem, but that it will be helpful for number
24 conservation in areas capable of supporting LNP. ExOp's network is capable of

1 supporting LNP, and ExOp intends to comply with the FCC's guidelines in this area. As
2 long as sequential number assignment is handled flexibly enough to permit seamless
3 transitions from one thousand block to another, ExOp does not believe Thousand Block
4 Number Pooling will impose an undue burden on ExOp's business or customers.

5 **Q: Does this conclude your testimony?**

6 **A: Yes.**

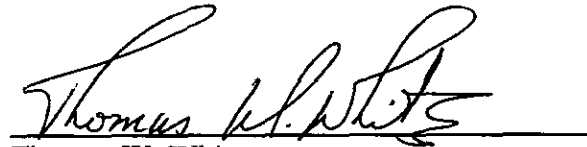
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STATE OF MISSOURI)

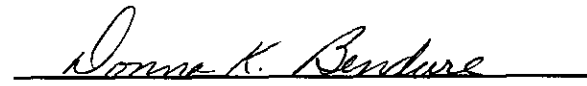
) ss:

COUNTY OF JACKSON)

Thomas W. White, being first duly sworn, upon his oath deposes and says that he is an officer of ExOp of Missouri, Inc., a Missouri corporation, that he has read and is familiar with the foregoing testimony, and that the statements therein are true to the best of his knowledge, information, and belief.


Thomas W. White

SUBSCRIBED AND SWORN to before me this 22nd day of June, 2000.


Notary Public

DONNA K. BENDURE
Notary Public - State of Missouri
Commissioned in Ray County
My Commission Expires April 1, 2002

My appointment expires:

4-1-2002

SERVICE LIST
ExOp of Missouri, Inc.
Case No. TO-2000-374
June 22, 2000

I hereby certify that a true and correct copy of the foregoing Rebuttal Testimony of Thomas W. White on behalf of ExOp of Missouri, Inc. has been hand delivered or mailed this 22nd day of June, 2000 to the following persons:

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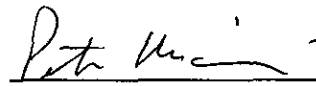
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A handwritten signature in cursive script, appearing to read "Pete Mirakian", positioned above a horizontal line.

Pete Mirakian