

FILED<sup>3</sup>

BEFORE THE PUBLIC SERVICE COMMISSION

JUN 23 2000

OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

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

AFFIDAVIT OF DEBORAH F. BELL

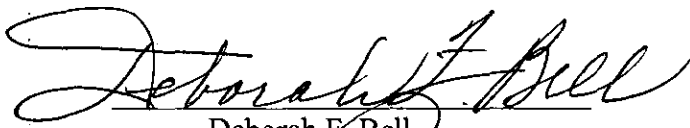
STATE OF TEXAS )

) SS

CITY OF DALLAS )

I, Deborah F. Bell, of lawful age, being duly sworn, depose and state:

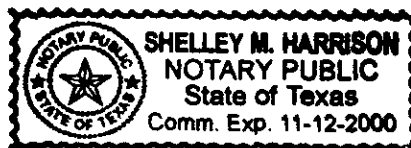
1. My name is Deborah F. Bell. I am presently Area Manager-NPA Relief Planning for SBC Operations, Inc.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

  
Deborah F. Bell

Subscribed and sworn to before this 16th day of June, 2000

  
Notary Public

My Commission Expires: \_\_\_\_\_



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1 pooling much ahead of the national rollout schedule. SWBT, like Mr. Cecil, but in  
2 contrast to Ms. Meisenheimer with the OPC, believes that it would be more  
3 efficient for Missouri to wait for the national rollout schedule. Waiting for the  
4 national rollout schedule would insure that the Commission would not have to  
5 address the issues of cost recovery or appoint a Number Pooling Administrator.  
6 Additionally, SWBT would need at least five (5) months from the date the order  
7 is released to implement a state number pooling trial.

8  
9 **Q. Why would it take at least five months to implement number pooling in**  
10 **Missouri?**

11 A. Several steps must be taken to guarantee the success of the implementation.  
12 SWBT would have to determine that the Signaling Transfer Point (STP)  
13 technology had enough capacity to handle the trial activity. If an upgrade to the  
14 STP were deemed necessary, additional software would have to be ordered,  
15 installed, and tested. A second critical step is the completion of a records  
16 verification of the billing records, assignment records, and SWBT's Code  
17 Administration records. This verification is conducted in order to assure that  
18 working numbers will not be erroneously transferred to the donation pool. Lastly,  
19 due to a need to balance the work demands on the STP technology and human  
20 resources, additional time -- beyond the previously cited five (5) months --  
21 would be a consideration if any simultaneous state orders were issued in the  
22 Southwest Number Portability Administration Center (NPAC) region (i.e., the  
23 states of Missouri, Kansas, Arkansas, Oklahoma and Texas).

1

2 **Q. You mention that the Commission would have to deal with cost recovery if it**  
3 **decided to implement a state number pooling trial. Please explain.**

4 A. FCC 00-104 – CC Docket No. 99-200 *Numbering Resource Optimization Report*  
5 *and Order and Further Notice of Proposed Rule Making (FCC NRO Report)* par.  
6 173 indicates “states conducting their own pooling trials must develop their own  
7 cost recovery scheme for the joint and carrier-specific costs of implementing and  
8 administering pooling in the NPA in question.”

9

10 **Q. If the Commission decided to implement a state number pooling trial, what is**  
11 **SWBT’s position on how the costs should be recovered?**

12 A. SWBT agrees with Mr. John Rollins of GTE Midwest Incorporated (Rollins direct  
13 testimony, page 11, lines 8–14) that costs should be recovered through an end-  
14 user surcharge.

15

16 **Q. Do you agree with Ms. Buyak of the Commission Staff that only 314 NPA**  
17 **customers should be impacted by the introduction of ten-digit dialing for all**  
18 **local calls (Buyak direct testimony, page 10, lines 3-12)?**

19 A. No. Although SWBT generally has supported overlays in large metropolitan  
20 areas, we believe that the industry’s recommendation of a retroactive overlay is  
21 the best relief method for the 314 NPA. As a result of SWBT’s experiences in  
22 Dallas and Houston, SWBT has found that in a split environment, customer  
23 confusion is magnified in both of the area codes when the dialing plan is mixed

1 with 7-digit and 10-digit dialing. For example, customers moving between the  
2 two newly split areas, in both Houston and Dallas, found it frustrating and  
3 counterproductive to have to stop and determine if they should dial 7 digits or dial  
4 10 digits dependent upon the location from which they were physically placing a  
5 call. Many times customers dialed the 7-digit number, received the recording or a  
6 wrong number, and then attempted to complete the call using 10-digit dialing. In  
7 an attempt to avoid misdialed calls and mounting frustration, many customers  
8 began to dial 10 digits all the time regardless of where they were. Thus, when  
9 the retroactive overlay was introduced mandating 10-digit dialing, it was an easy  
10 and welcomed transition for customers in both previously split area codes that  
11 shared a high degree of community of interest.

12  
13 **Q. Do you agree that an all-services overlay of the 314 NPA would cause less customer**  
14 **confusion than the retroactive overlay and that "from a customer education**  
15 **standpoint, the straight overlay of the 314 NPA is a far better option." (Buyak direct**  
16 **testimony, page 10, lines 13-18)?**

17 **A.** No. From a customer education perspective, both the 636 and 314 customers would have  
18 to be educated. Since the areas are contiguous, both NPAs share the same communities  
19 of interests, and customers move between the two NPA areas daily. Thus, both the 314  
20 and 636 customers must be informed of any changes which impact their dialing patterns.  
21 For example, customers would have to be instructed that it was necessary to dial 10 digits  
22 when dialing from the 314 NPA to another 314 customer or to a 636 customer.  
23 Customers dialing from a 636 number to another 636 number would have to be instructed

1 that it was not necessary to dial 10 digits for local calls. For customers placing local calls  
2 between the 314 and 636, notification would have to be given that it was always  
3 necessary to dial 10 digits. In addition, if an all-services overlay were ordered for the 314  
4 NPA, all 314 NPA wireless customers (this includes customers who reside in the 636  
5 NPA), would have to dial 10 digits for all local calls -- an overlay would mandate that all  
6 customers dial 10 digits for all local calls originating and terminating in the 314 NPA.  
7 Also, these same customers would also have to dial 10 digits to complete a call to a 636  
8 NPA customer. Hence, all 314 NPA wireless customers would have to dial 10 digits for  
9 all local calls.

10  
11 **Q. Do you agree with Ms. Meisenheimer of OPC that a retroactive overlay would**  
12 **promote the premature exhaust of the newly established 636 area (Meisenheimer**  
13 **direct testimony, page 6, lines 5-7)?**

14 **A.** It may, but once a retroactive overlay is implemented, the exhaust date becomes a non-  
15 issue because there will be little impact on customers during future relief. For example,  
16 the Texas Public Utility Commission mandated additional overlays in 1998 and  
17 customers in Dallas and Houston have not been significantly impacted by area code  
18 relief changes since the retroactive overlay was implemented in 1996. As a result of the  
19 314/636 split, most 314/636 customers are already familiar with 10-digit local dialing;  
20 therefore, customers would simply need to be informed that a new NPA was being added  
21 in the area. In addition, a retroactive overlay would actually promote better utilization of  
22 the numbering resources in the St. Louis area by providing relief without having to use  
23 an additional area code.

1

2 **Q. Although OPC opposes a retroactive overlay for the 314 and 636 NPAs, Ms.**  
3 **Meisenheimer does indicate support for an overlay of just the 314 NPA**  
4 **(Meisenheimer direct testimony, page 6, lines 15-18). What is SWBT's view of**  
5 **OPC's position?**

6 **A.** While SWBT continues to believe that a retroactive overlay is the best long-term solution  
7 for the greater St. Louis area, SWBT is encouraged by OPC's position to support an  
8 overlay for the 314 NPA. Given OPC's historical preference for supporting geographic  
9 splits as the preferred method of relief, SWBT believes OPC has good reasons for now  
10 supporting an overlay for the 314 NPA. OPC recognizes that at some point, the  
11 geographic areas get too small for a split to be effective and the benefits of an overlay  
12 outweigh the benefits of a split (Meisenheimer direct testimony, page 31, lines 3-6). As I  
13 mentioned, SWBT continues to support a retroactive overlay, however, an all-services  
14 overlay of just the 314 NPA would be the next best plan. An overlay of just 314 would be  
15 significantly preferable to any type of geographic split of the 314 NPA. It is important to  
16 note that no commenting party is proposing any type of geographic split for the 314 NPA.

17

18 **Q. Does SWBT support the establishment of a threshold of 90 codes to be used as a**  
19 **trigger for area code relief in the 314 NPA as proposed by Ms. Meisenheimer**  
20 **(Meisenheimer direct testimony, page 30, lines 3-18)?**

21 **A.** No. Due to the uncertainty of exhaust, it is problematic to recommend that a back-up  
22 relief plan not be initiated until central office codes fall below a pre-determined threshold  
23 as suggested by Ms. Meisenheimer. This proposal runs the risk of not allowing the

1 industry and consumers ample time to plan for the area code relief. Industry members and  
2 customers are placed at a disadvantage if a jeopardy has to be declared thereby restricting  
3 the assignment of NXXs and the ability to subscribe to new services. SWBT estimates  
4 that it takes six (6) to nine (9) months to implement an overlay. Therefore, it is definitely  
5 possible that using a threshold will not provide service providers sufficient time to  
6 implement the area code relief as planned. Moreover, the industry is already operating in  
7 a jeopardy situation which may artificially constrain the allocation of numbering  
8 resources which may harm service providers' ability to provide services to their  
9 customers. It is not in the best interest of the public to operate in a jeopardy situation and  
10 the Commission should take steps now, including mandating implementation of area code  
11 relief with a specified implementation date, so that the current jeopardy may be  
12 eliminated.

13  
14 **Q. Although the majority of the parties support an overlay for the 816 NPA, Ms.**  
15 **Meisenheimer suggests that the Commission may want to order a geographic split**  
16 **and that the dividing line of the split should be roughly along the Missouri River**  
17 **(Meisenheimer, page 31, lines 17-20). Does SWBT have concerns about a**  
18 **geographic split along the Missouri River?**

19 **A.** Yes, SWBT has several concerns. SWBT is opposed to a split in general because we  
20 believe an overlay will provide the best long-term solution. Any reasonable geographic  
21 split line will split the local calling scope in the Kansas City area which will create a  
22 confusing mix of 7 and 10 digit dialing for local calls. Implementing a geographic split



1 will force a large number of customers to change their telephone numbers. Also, SWBT  
2 believes that a split along the Missouri River will divide communities of interest.  
3

4 **Q. Ms. Meisenheimer suggests that the Commission should postpone its decision on the**  
5 **type of relief to be implemented in the 816 NPA until 100 NXX codes remain**  
6 **(Meisenheimer direct testimony, page 31, lines 17-18). Do you agree with the**  
7 **approach?**

8 **A.** No. SWBT believes this is a risky proposition. We are nearing exhaust of the 816 NPA  
9 and we should decide now on a relief plan and begin implementing that relief plan to  
10 avoid a situation where the existing numbers may quickly exhaust. As it exists now, the  
11 industry will likely be forced to operate in a jeopardy situation before the 816 NPA relief  
12 is implemented. Waiting to make a decision on relief until some small number of codes  
13 remains is not good public policy because it may not leave sufficient time to implement  
14 the relief.  
15

16 **Q. Does SWBT agree with Ms. Meisenheimer that the Commission should continue to**  
17 **pursue authority to conduct state number pooling trials (Meisenheimer direct**  
18 **testimony, page 5, lines 15-23)?**

19 **A.** Based on the FCC criteria (*FCC NRO Order, par 163-164*), the 314 NPA, which is  
20 projected to exhaust the second quarter of 2001, would not qualify for a state number  
21 pooling trial because the life of the NPA would be less than one year. The 816 NPA,  
22 which is projected to exhaust the first quarter of 2002, is questionable when you figure in  
23 the five (5) months which would be needed to complete implementation tasks after

1 issuance of a Commission order. Additionally, the 816 NPA would also need to satisfy  
2 the FCC requirement that it has a life span remaining of at least a year.

3  
4 **Q. Please summarize your rebuttal testimony.**

5 A. SWBT supports the industry's relief recommendation of a retroactive overlay for the 314  
6 NPA and the all-services overlay of the 816 NPA. The suggestion to set up an  
7 implementation team to work on issues associated with a state number pooling trial also  
8 meets with broad support from SWBT. However, SWBT believes that consumers, the  
9 Commission, and the industry will be better served by waiting for national thousands-  
10 block number pooling implementation rather than mandating state number pooling trials  
11 at this time.

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13 **Q. Does this conclude your rebuttal testimony?**

14 A. Yes, it does.  
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