

Exhibit No.: _____
Issue: NANP Petition
and Related Issues
Witness: John C. Rollins
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: GTE Midwest Incorporated
Case No.: TO-2000-374
Date Testimony Prepared: July 12, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUL 12 2000

Missouri Public
Service Commission

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

SURREBUTTAL TESTIMONY

OF

**JOHN C. ROLLINS
SENIOR PLANNING MANAGER
NETWORK PLANNING**

ON BEHALF OF

GTE MIDWEST INCORPORATED

July 12, 2000

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

2

3 **I.**

4 **INTRODUCTION**

5

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

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

9

10 **Q. ARE YOU THE SAME JOHN ROLLINS THAT PREVIOUSLY FILED**
11 **DIRECT AND REBUTTAL TESTIMONY IN THIS CASE?**

12 A. Yes.

13

14 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

15 A. I will respond to issues raised in the rebuttal testimony of Office of the
16 Public Counsel (OPC) witness Ms. Barbara Meisenheimer, and
17 Commission Staff witness Mr. Walt Cecil.

18

19 **Q. DO YOU AGREE WITH MS. MEISENHEIMER'S STATEMENT (PAGE**
20 **10) THAT A MANDATORY SURCHARGE ON CONSUMERS WOULD**
21 **UNFAIRLY PLACE ON CONSUMERS THE FULL RESPONSIBILITY**
22 **FOR THE PAST INEFFICIENT NUMBER UTILIZATION SYSTEM THAT**
23 **HAS LED US TO THE NEED FOR POOLING AS A NUMBER**
24 **CONSERVATION METHOD?**

1 A. Certainly not. The past numbering system was as efficient as the
2 capabilities of the time allowed. It allowed for call routing without placing
3 higher cost burdens on the public for the delivery of telephone service. It
4 has only been recently, with the implementation of Local Number
5 Portability (LNP), that number pooling could be implemented.

6
7 One of the primary drivers for number exhaust is the increase in carriers
8 serving an area. Since this increased competition should benefit all
9 customers, it is not unreasonable that customers should pay for a portion
10 of the cost of implementing network modifications that will allow
11 carriers/customers to obtain numbering resources. Consistent with the
12 FCC's position in its recent Numbering Order, the Commission should
13 approve a competitively neutral end user surcharge based on "the shared
14 industry costs and carrier-specific costs directly related to thousands-block
15 number pooling implementation."

16
17 **Q. DO YOU AGREE WITH MR. CECIL'S STATEMENT (PAGE 5) THAT**
18 **THE UTILIZATION RATES SUGGESTED BY GTE WOULD RESULT IN**
19 **INEFFICIENCY AND ALLOW CARRIERS TO REQUEST NUMBERS**
20 **BEFORE THEY ARE ACTUALLY NEEDED.**

21 A. No. I stand by my earlier direct testimony (page 17, lines 9-20)
22 concerning the appropriate utilization threshold. In addition, if a utilization
23 rate is set too high, there is a risk that carriers may not be able to respond

1 to customers' needs in a timely manner. Because of the time required to
2 order and implement a new NXX code, waiting until a carrier reaches an
3 85% threshold before a code can be ordered could mean carriers would
4 run out of available numbers prior to activating the new code. The
5 utilization rates recommended in my prior testimony provide the proper
6 balance between efficiency and availability.

7

8 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**


9 **A. Yes.**

10

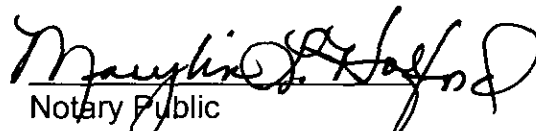
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STATE OF TEXAS)
) ss.
COUNT OF DALLAS)

On this 10th day of July, 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 10th day of July, 2000.


Notary Public

My Commission Expires: 11-12-2002

