

Exhibit No.:

Issues: 314/816 Area Codes

**FILED<sup>2</sup>**

JUN 23 2000

Witness: Walt Cecil

Type of Exhibit: Rebuttal Testimony

Sponsoring Party: MO PSC Staff

Case No.: TO-2000-374

Missouri Public  
Service Commission

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**WALT CECIL**

**CASE NO. TO-2000-374**

**Jefferson City, Missouri**

**June 23, 2000**

**REBUTTAL TESTIMONY**

**OF**

**WALT CECIL**

**IN**

**CASE NO. TO-2000-374**

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

A. My name is Walt Cecil. My business address is Truman State Office Building,  
Room 530, 301 W. High St., P.O. Box 360, Jefferson City, Missouri 65102-0360.

**Q. Are you the same Walt Cecil who filed direct testimony in this case?**

A. Yes, I am.

**Q. What is the purpose of your testimony today?**

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Ms.  
Barbara Meisenheimer from the Office of the Public Counsel (OPC), Ms.  
Deborah Bell of Southwestern Bell Telephone Company (SWBT), and Mr. John  
Rollins of GTE Midwest (GTE).

**Q. Do you support OPC's proposal for a geographic split of the 816 Number  
Plan Area along the Missouri River?**

A. No. A split of the 816 NPA along the Missouri River may have some undesirable  
impacts such as increased dialing confusion, imbalanced number relief, and

1 division of a community-of-interest.

2

3 **Q. Please explain how splitting the 816 NPA along the Missouri River may**  
4 **increase dialing confusion.**

5 A. Currently ten-digit dialing is already required to dial local numbers between  
6 Kansas and Missouri. A geographic split along the Missouri River would divide  
7 the Kansas City Metropolitan Calling Area (MCA) plan, including the mandatory  
8 tiers of the plan. Current seven-digit dialing within the MCA area would change  
9 to ten-digit dialing for local calling between the old and new NPAs. Therefore, a  
10 geographic split would greatly expand the requirement of dialing ten digits to  
11 place local calls within the Kansas City metropolitan area. This expansion  
12 increases the prospect that customers will be confused as to whether certain calls  
13 need to be dialed on a seven or ten-digit basis. Although the St. Louis MCA was  
14 split in the outer tiers so that it encompasses both the 314 and 636 NPAs, such  
15 splits do confuse callers.

16

17 An example which demonstrates that a split further complicates the MCA was put  
18 forth by Mr. Philip J. Scissors in his testimony on March 24, 2000 at the public  
19 hearings held by the Commission in Chesterfield, Missouri. Mr. Scissors, a  
20 resident of and practicing Certified Public Accountant in Chesterfield, testified  
21 that previous to the 314/636 NPA split, many of his clients came from a  
22 metropolitan-wide base. After the split was imposed, because of the uncertainty  
23 of which calls were to be seven-digit and ten-digit dialed, sufficient confusion

1 was created in his clients' minds as to cause them to acquire CPA services within  
2 their own NPA. Some of those clients had their own offices within a few blocks  
3 of Mr. Scissors' office. Further, the split line is drawn through the City of  
4 Chesterfield such that his home has one NPA and his office has another and both  
5 are within a few blocks of one another. Mr. Scissors further testified that he  
6 understood the need for the relief but that in retrospect an overlay would have  
7 resulted in less overall confusion, inconvenience, and loss of business.

8  
9 **Q. Please explain how splitting the 816 NPA along the Missouri River may**  
10 **provide imbalanced number relief.**

11 A. From a technical standpoint, a geographic split along the Missouri River would  
12 not be balanced. In Ms. Meisenheimer's Direct Testimony, Schedule BAM-5,  
13 page 4, she indicates there are 171 NXXs assigned north of the Missouri River  
14 and 366 NXXs south of the river. Given these numbers, a split along the Missouri  
15 River cannot be balanced. Also, as economic activity is greater and population  
16 size is larger on the south side of the river, it is much more likely that the south  
17 side of the split will exhaust first. By splitting the 816 NPA along the river the  
18 north side will receive approximately 621 NXXs with which to grow while the  
19 south side will receive 426 NXXs.<sup>1</sup> Clearly, if the south side of the split is more  
20 economically active, then it will need a greater number of NXXs with which to

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<sup>1</sup> These figures are found by subtracting Ms. Meisenheimer's figures found in table BAM-5, p.4 of her Direct Testimony from an assumed maximum of 792 NXXs per NPA. Thus:  $792 - 171 = 621$  and  $792 - 366 = 426$  respectively.

1 grow than will the north side of the split. It is questionable to offer the smaller  
2 and less active region more relief than the larger and more active region will  
3 receive. Staff certainly agrees that a split can be appropriate in any large rural  
4 area or between a large rural and an urban area but such is not the case under  
5 consideration. Staff disagrees with OPC's position and suggests the Commission  
6 not consider a geographic split as the relief method to be employed in this case.  
7

8 **Q. Please explain how splitting the 816 NPA along the Missouri River may**  
9 **divide a community of interest.**

10 A. Various civic and business groups in the affected areas presented testimony at the  
11 public hearings in Kansas City and St. Joseph stating the communities north of the  
12 Missouri River desire to be considered as a part of the greater Kansas City  
13 metropolitan area. Those communities recognize they are economically  
14 interdependent with the communities south of the river. To impose a geographic  
15 split would impede local efforts to bring about a stronger sense of community in  
16 the region. Some organizations from communities located north of the Missouri  
17 River that sent representatives to testify in opposition to a geographic split were:  
18 the Liberty Area Chamber of Commerce; the Clay County Economic  
19 Development Council; and the St. Joseph Chamber of Commerce.  
20  
21  
22  
23

1 **Q. Do you have any comments regarding SWBT's and GTE's positions on the**  
2 **imposition of utilization rates?**

3 A. Yes, Staff supports the imposition of utilization rates but disagrees with SWBT's  
4 and GTE's proposals for utilization rate levels. SWBT and GTE propose to begin  
5 at 55% and 50%, respectively, with each to be increased by 5% annually until a  
6 maximum of 70% and 65%, respectively, is reached. Staff maintains that such  
7 low rates will result in inefficiency and allow carriers to request numbers before  
8 they are actually needed. Staff proposes the Commission adopt an initial rate of  
9 75% and consider raising it to 80% or 85% over time. The States of Maine,  
10 California, Massachusetts, New Hampshire, and New York have adopted fill rates  
11 of 75% and have indicated that no carrier has suffered from a shortage of  
12 telephone numbers. However Staff recognizes only nonpooling carriers will be  
13 subject to these rates.<sup>2</sup> Since both Kansas City and St. Louis will be pooled and  
14 these two regions contain most of the lines in the State, the actual benefit derived  
15 from imposing utilization rates will not be as significant as that from other  
16 number conservation methods. Nevertheless, Staff maintains high utilization  
17 rates are appropriate and disagrees with the lower proposals suggested by SWBT  
18 and GTE.

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<sup>2</sup> In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, FCC-00-104, Report and Order and Further Notice of Proposed Rule Making, ¶ 142.

1 **Q. What is Staff's response to SWBT's rate center consolidation studies?**

2 A. According to SWBT witness, Deborah Bell, SWBT has commenced an  
3 investigation in the 816 NPA of the consolidation of thirteen rate centers into five.  
4 Staff supports SWBT in these efforts.

5  
6 Staff concurs with Ms. Bell's suggestion that the Commission order all other  
7 incumbent local exchange carriers and facilities based CLECs located in 816 NPA  
8 to consolidate rate centers where possible and practical. By doing so, the  
9 Commission would be maximizing the effects of other number conservation  
10 efforts and, thereby, would be enhancing the life of any relief ordered. With the  
11 rollout of the national number pooling program, each rate center will be required  
12 to contain its own pool of NXXs; with fewer rate centers in the 816 NPA, each  
13 NXX or thousand-block will have the capacity to serve more end-users and a  
14 larger geographic area. Therefore, by ordering the consolidation of rate centers,  
15 the Commission would enhance the viability and life of any other number  
16 conservation effort employed, and any relief effort ordered would also endure  
17 longer.

18  
19 **Q. What is Staff's position on the reclamation of NXXs and thousand-blocks?**

20 A. Staff believes that the Commission certainly has the authority to initiate the NXX  
21 reclamation process under the Federal Communication Commission's (FCC)  
22 Order (FCC Order).<sup>3</sup> However, Staff is unclear as to how significant the benefit

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<sup>3</sup> *Id.* at ¶¶ 237-41.

1        derived from such activity before relief is performed will be. OPC's witness, Ms.  
2        Meisenheimer, has indicated on page 17 of her Direct Testimony that there are 23  
3        NXXs eligible to be reclaimed in the 816 NPA. Using Ms. Meisenheimer's  
4        estimated allocation rate of 7 codes per month, Staff sees an additional 3.28  
5        months delayed-exhaust gained. In principle, Staff agrees with OPC that  
6        aggressive reclamation should be performed wherever and whenever it becomes  
7        necessary to do so, however, Staff does not believe that reclaiming 23 NXXs will  
8        delay the need for number relief. Rather, Staff proposes that the Commission  
9        order NXX reclamation procedures be included in the larger relief plan.

10  
11    **Q.    Does this conclude your testimony at this time?**

12    **A.    Yes, it does.**



**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the North American )  
Numbering Plan Administrator, on Behalf of )  
the Missouri Telecommunications Industry, )  
Petition for Approval of NPA Relief Plan for )  
the 314 and 816 Area Codes. )

Case No. TO-2000-374

**AFFIDAVIT OF WALT CECIL**

STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

Walt Cecil, of lawful age, on his oath states: that he has participated in the preparation of the foregoing written rebuttal testimony in question and answer form, consisting of 7 pages of rebuttal testimony to be presented in the above case, that the answers in the attached written rebuttal testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Walt Cecil

Subscribed and sworn to before me this 22<sup>nd</sup> day of June, 2000.

  
\_\_\_\_\_  
Notary Public

My commission expires October 14, 2003

NILA S HAGEMEYER  
NOTARY PUBLIC STATE OF MISSOURI  
COLE COUNTY  
MY COMMISSION EXP. OCT. 14, 2003