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SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TO-2000-374

SURREBUTTAL TESTIMONY

OF

DEBORAH F. BELL

Dallas, Texas  
July, 2000

**SURREBUTTAL TESTIMONY OF DEBORAH F. BELL  
ON BEHALF OF SOUTHWESTERN BELL TELEPHONE COMPANY**

**Q. Are you the same Deborah F. Bell that previously filed testimony in this case?**

**A. Yes, I am.**

**Q. Office of Public Counsel (OPC) witness, Ms. Meisenheimer, recommends that costs associated with a number pooling trial “should be treated as are other costs of doing business and recovered according to the statutory requirements governing pricing for the particular carrier.” (Meisenheimer rebuttal, page 10, lines 6-9). Do you agree?**

**R. No. The FCC’s *Numbering Resource Optimization Report and Order and Further Notice of Proposed Rule Making* (NRO Order) definitively indicates that states must develop a cost recovery scheme to allow carriers to recoup the costs of implementation and administration of number pooling trials (NRO Order, para. 173). Ms. Meisenheimer’s recommendation is in direct contradiction with the NRO Order.**

**Q. Ms. Meisenheimer’s (Meisenheimer rebuttal testimony, page 13, lines 14-15) evaluation of the 816 NPA results in her projection of a life span of 2.4 years in contrast to Neustar’s projected exhaust of first quarter of 2002. Which**

1        **exhaust date should the Commission consider when determining if a state**  
2        **number pooling trial meets the criteria established in the NRO Order?**

3        R.     The FCC released a "Public Notice" DA 00-1549 on July 11, 2000 from the  
4        Common Carrier Bureau which responded to questions received from impacted  
5        telecommunications entities relating to the NRO Order. In response to the  
6        question of who is to determine the remaining life span of an NPA (NRO Order,  
7        para. 161), the FCC clarified that the *NPA in question must have a remaining life*  
8        *span of at least one year according to the most recent NANPA projections.*  
9        (Public Notice, page 4, Implementation Issues). Thus, the Commission is  
10       obligated to use NANPA's projections and not the estimations provided by OPC.  
11       As I indicated in my rebuttal testimony, the steps (i.e. STP technology, records  
12       verification, attainment of a pooling administrator, and cost recovery) which must  
13       be taken to guarantee the successful implementation of a state number pooling  
14       trial may not allow enough time to deploy pooling much ahead of the national  
15       rollout schedule.

16  
17       **Q.     Mr. Cecil of the Commission staff stated that reclamation of 23 codes in the**  
18       **816 NPA would not delay the need for number relief (Cecil rebuttal**  
19       **testimony, page 7, lines 7-8). Do you agree?**

20       R.     Yes, reclamation of 23 codes will not significantly delay the need for number  
21       relief. Additionally, Southwestern Bell Telephone Company (SWBT) agrees with  
22       Mr. Cecil that aggressive reclamation should be performed as necessary.  
23       However, in the case of 816, such an abbreviated extension in the exhaust

1 schedule should not preclude the Commission from expeditiously deciding on a  
2 relief methodology and timeline.

3  
4 **Q. In Mr. Cecil's rebuttal testimony, pages 3-4, he highlighted how splitting the**  
5 **816 NPA along the Missouri River may not provide for balanced number**  
6 **relief. Does SWBT agree?**

7 R. Yes. Further, as Mr. Cecil indicated, a significant problem area is the loss of  
8 community of interest. As I pointed out in my rebuttal testimony, SWBT has  
9 additional concerns with a geographic split of the 816 NPA which include  
10 dividing both the local calling scope and the metropolitan exchange and customer  
11 confusion resulting from a mix of 7 and 10-digit dialing for local calls. The  
12 Commission should keep in mind that customers are already familiar with local  
13 10-digit dialing since 10-digit dialing is now necessary when placing local calls  
14 between the Kansas City 816 NPA and the Kansas 913 NPA.

15  
16 **Q. Is there a good geographic split alternative for the 816 NPA?**

17 A. Not really. Any geographic split line that provides reasonably balanced number  
18 relief will have to divide both the local calling scope in Kansas City and the  
19 Kansas City metropolitan exchange. For example, a balanced split line would  
20 probably have to split the Principal zone and perhaps a few of the MCA 1 zones  
21 from the rest of the area. Hence, the result would be the creation of two (2)  
22 disproportionate areas -- one very small area and one very large area, telephone  
23 number changes, and a significant amount of 10-digit dialing to place local calls.

1 Hence, the most touted advantage of a geographic split, retention of local 7-digit  
2 dialing, would be minimized.

3  
4 **Q. How long would a geographic split last?**

5 A. Based on Neustar's projections, a geographic split of the 816 NPA will not last  
6 very long. Neustar analyzed a relatively balanced split which reflected a projected  
7 life span of 6.3 years. This projection may not take into account any shifting of  
8 wireless codes. SWBT believes that such a split would force the Commission and  
9 the industry to continuously address NPA relief.

10  
11 **Q. Ms. Meisenheimer states that according to the Industry consensus schedule, a**  
12 **retroactive overlay would accelerate the exhaust of both the 314 and 636**  
13 **NPA's two (2) years after implementation. (Meisenheimer rebuttal testimony,**  
14 **page 5, lines 15-17). Is her conclusion accurate?**

15 R. No. Ms. Meisenheimer misinterprets the industry report. As indicated on page 3  
16 of Exhibit A of Ms. Tokarek's direct testimony, the intent of the initial  
17 recommendation to implement a subsequent overlay two years after  
18 implementation of the retroactive overlay was to establish a date by which all  
19 affected 9-1-1 parties would need to have their systems upgraded to address the  
20 NPD exhaust situation. Since the exhaust of NPDs is no longer an issue in the  
21 314 NPA, the scheduling of an additional full-service distributed overlay is not  
22 necessary.

1    **S.     Will a retroactive overlay of the 314/636 NPAs exhaust sooner than an all-**  
2           **services overlay of the 314 NPA?**

3    **T.     It may, but with the implementation of national number pooling, the exhaust of**  
4           **the retroactive overlay could possibly be significantly delayed. Also, once the**  
5           **retroactive overlay is implemented, as I explained in my earlier testimony,**  
6           **subsequent overlays create very little disruption. If the Commission decides to**  
7           **adopt the industry recommendation of a retroactive overlay, the Commission will**  
8           **not have to again confront the difficult NPA relief decision as long as any**  
9           **subsequent relief is in the form of an overlay.**

10

11   **Q.     Does this conclude your surrebuttal testimony?**

12   **A.     Yes, it does.**

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