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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint-Florida,)
Incorporated for Partial Waiver)
of Rule 25-4.081, F.A.C.)
_____)

Docket No. 970509-TL

Filed: April 29, 1997

**PETITION OF SPRINT-FLORIDA, INCORPORATED
FOR PARTIAL WAIVER OF RULE 25-4.081, F.A.C.**

COMES NOW SPRINT-FLORIDA, INCORPORATED (Sprint-Florida", "Petitioner" or "Company"), pursuant to Commission Rule 25-22. 036, F.A.C., Rule 28-104, F.A.C. and Section 120.542, Florida Statutes, and files this request for a partial waiver until March 1, 1998 from the requirements of Rule 25-4.081, F.A.C. That rule requires Sprint-Florida to provide access to 911 for subscribers whose service is temporarily disconnected for non-payment. As discussed below, Petitioner also respectfully requests that the Commission give consideration to addressing the Petition prior to July 1, 1997. In support, Sprint-Florida states as follows:

PETITIONER

1. The Petitioner is:

Sprint-Florida, Incorporated
Box 165000
Altamonte Springs, Florida 32716

REPRESENTATION

2. The Petitioner is represented in this matter by:

Charles J. Rehwinkel

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FPSC-RECORDS/REPORTING

General Attorney
Sprint-Florida Incorporated
P.O. Box 2214
Tallahassee, Florida 32301

AFFECTED RULE

3. Petitioner seeks relief from Rule 25-4.081 which reads:

25-4.081. Emergency 911 Access.

(1) Access to emergency 911 services shall be provided by the local exchange company to basic local exchange company subscribers.

(2) By July 1, 1997, access to 911 shall be maintained for the duration of any temporary disconnection for non-payment of a subscriber's local residential service, except that small local exchange companies as defined by Section 363.052(1), Florida Statutes, shall have until July 1, 1998, to comply.

STATUTORY AUTHORITY

4. The subject rule cites Section 364.03(3), Florida Statutes as the law being implemented. At this time, the Petitioner is unaware of any additional statute implemented by the rule.

RELIEF REQUESTED

5. Petitioner Sprint-Florida seeks a partial waiver from the requirement that by July 1, 1997 all subscribers receive 911 service when service is temporarily disconnected due to non-payment of local service. Sprint-Florida requests a waiver until March 1, 1998 for areas where the company is now, or will be, technologically unable to offer the required service. The area where the waiver is needed involves approximately 90% of Sprint-Florida's customers. Attachment A contains a list of switches where the waiver is not needed. Customers served out

of all other switches will be affected by the waiver, if granted.

6. Since the effective date of the Rule, Sprint-Florida has been working to implement the requirements of the rule. Despite diligent and best efforts, technical difficulties have become apparent that have made it impossible to cost-effectively meet the Rule requirements for a majority of our customers.

7. In the process of working to develop the capability to provide 911 to residential customers whose service is temporarily disconnected (also known as and referred to herein as "warm line 911" or "911 on suspension"), Sprint-Florida has discovered that meeting the July 1, 1997 deadline will be impossible to cost-effectively meet. Furthermore, Petitioner has discovered that switch upgrades, necessary to provide permanent number portability, may cause some customers who now (or will by July 1, 1997) have warm line 911 service to no longer receive the service during periods of temporary disconnection. Thus if CLECs require number portability in selected 1210 switches at this time, Sprint-Florida believes that a waiver may also be needed for the possible loss of warm line 911.

BASIS FOR RELIEF

8. Petitioner believes that a historical perspective of the development of the rule is useful for understanding why the company is unable to meet the deadline imposed by the rule. As the record of Docket No. 960371-TL indicates, the initial proposal was focused on providing 911 service to customers whose service was permanently disconnected. The staff data request to which the Company responded sought cost impact information on a rule requiring the service for permanent disconnection. The Petitioner responded to that request, which formed the basis for the Economic Impact Statement (EIS), on the assumption that service would be provided when disconnection was permanent. Only one question (#2) asked whether the Company had a method in place to allow access to 911 when service had been disconnected for nonpayment. Question 2(a) only requested information on the differences in implementation between permanent and temporary disconnection if the answer was "yes". The Company answer was "no". See the Sprint response included herein as Attachment B.

9. The rulemaking process advanced utilizing the data request developed under the permanent disconnection assumption. It was not until the staff recommendation, filed on September 4, 1996, that the temporary disconnection option became the rule proposal. The staff recommendation stated that in response to a legislative proposal and the data request responses that "the Commission staff modified the strict, all inclusive requirements provided for in HB 2271 to require maintenance of 911 service only to temporarily disconnected telephones." See, Recommendation in Docket 960371-TL, dated September 4, 1996 at pp 1-2. Clearly the impression existed that the temporary disconnection implied a less costly, less burdensome Company solution. No further EIS process was undertaken to explore the cost under a temporary disconnection scenario.

10. In accordance with the recommendation, the Commission voted to propose the rule as recommended by staff. No hearing was requested. On December 16, 1996 the rule was filed with the Secretary of State. On December 17, 1996, Order PSC-1540-FOF-TL adopting the rule was issued. On January 6, 1997 the Rule became effective. No challenge to, or appeal from the Notice of Adoption of the Rule has been taken.

11. Very soon after the effective date of the rule, Petitioner began the process of preparing to implement the rule. Internal review subsequently has shown that the assumptions as to technical implementation proceeded along the lines as those of the Commission and the staff. In other words, maintenance of 911 to temporarily disconnected lines was seen as a lesser burden than in cases of permanent disconnection. Unfortunately, the issue was not one of degree. Instead, the situations are different entirely.

12. Only in the process of implementation has Sprint-Florida discovered that the ability to maintain customer access to 911 is one that requires different switch software, customer service data base software revisions or extremely costly manual processing of service orders. The problem arises because switches that serve approximately 90% of our customers do not currently have the ability to provide warm line 911. The difference between providing the service to a temporarily disconnected service and permanently disconnected line is substantial. In the case of a permanent disconnection, provision of 911 to disconnected lines is a matter of providing sufficient additional facilities to maintain service where the company wouldn't know whether the

customer had moved away or was just unable to pay to have service restored. There would be no need to maintain a record of the customers prior service configuration. Upon restoral of service an entirely new service would effectively be established.

13. Preservation of 911 service for the limited time that service is temporarily disconnected is a matter of record keeping. Currently the non-capable (5ESS and DMS100) switches do not "remember" what features the customer had prior to suspension. As discussed below, that capability would need to be installed in the switches. The other solution would be to program the service ordering data base to remember what features are to be restored after the period where only 911 service is to be provided. It is this aspect of the issue that was not apparent during the consideration of the permanent disconnection rule proposal. This misunderstanding carried through to the period after the Commission initially voted to require the 911 service during temporary suspension. The company did not understand the need to apprise the Commission of the difficulties until now.

14. Currently Sprint-Florida, Incorporated provides 911 service through several types of switches. Because of the features resident in the switches, only 2 types of switches possess the capability of meeting the rule requirement of providing 911 service to temporarily disconnected customers without any costly manual steps or modifications to computer systems. All other switches are incapable of providing 911 on suspension without generic software upgrades. Sprint-Florida will be unable to provide 911 on suspension to the customer served by these switches unless the software for a major administrative data system (Service Order Distribution System or SODS) is rewritten or the disconnects are tracked and implemented manually.

15. At this time Sprint-Florida believes that the generic software upgrade would be the most cost-effective solution if time was not of the essence. However, the vendors for the 5ESS and DMS100 switches (Nortel and Lucent, respectively) have indicated that installing the capability in switches now in service will require making a core system change to the next generation of generic software. That generation is not due to be available before July of 1998 at the earliest. The Company plans do not currently anticipate buying this generation of software. Even if it was bought, current practice is to install the software in switches over 12-18 months in accordance with budget and engineering guidelines. On April 1, Nortel began to explore writing

the warm line capability in the DMS100 switch software. On April 18 the vendor of the 5ESS (Lucent) switch just began the initial steps towards development of a switch capable of meeting the rule requirements. There are no guarantees that these system changes will occur and if so, that the projected time lines will be met.

16. As an alternative to placing the capability in the switch at this time, Sprint-Florida, Incorporated has determined that the only other reasonable option would be to rewrite the software for SODS. Presently this system does not retain the information regarding the disconnected customer's service configuration (i.e. what features are subscribed) prior to suspension. At this time, it is estimated it would take approximately 12 months and cost approximately \$300,000 to modify the system to accommodate the requirements of Rule 25.4-081. This time frame is unavoidable due to the fact that the key personnel are working on rewriting the same software to implement mandated resale and interconnection with CLECs.

17. Sprint-Florida, also has the undesirable and costly option of manually processing approximately 65,000 transactions (40,000 estimated disconnects and 25,000 restorals) each month. Sprint-Florida, estimates that manual processing of the transactions would require additional employees to be trained by July and ready to provide the service at a cost of approximately \$2,000,000 annually. A manual option that injects the risk of human error in retention of 911 at such a high expense is cost-prohibitive. Furthermore, pressure on day-to-day service ordering functions could cause service delays in processing new orders. Petitioner does not believe that such a costly solution was at all contemplated by the Commission's vote to adopt Rule 25-4.081, F.A.C.

18. Sprint-Florida has explored other options that would essentially require the company to maintain full outward dialing-capable service for a non-paying customer. Clearly such a policy would have a rapidly erosive effect on the resolve of customers to pay bills. Petitioner does not believe that such a result is the price at which the commission intended 911 service to be provided in these circumstances. Furthermore, the Company has not had time to evaluate all the possible ramifications (i.e. fraud) of such a solution.

19. Petitioner recognizes that the information submitted in the rulemaking process does not clearly indicate the magnitude of the problem facing the company today. As discussed above,

the reasons can be explained. The company takes the issue of 911 service very seriously and would have preferred to have more accurately advised the Commission of the difficulties only recently discovered in the implementation process. As shown above there was no intent to mislead the Commission. Clearly the company is committed to providing the service as the Commission intended. At this time, it appears that internal communication regarding all possible solutions to meeting the rule requirement were not fully explored in the context of the sudden change in the development of the rule proposal.

20. Petitioner believes that our only cost-effective option that will strike the right balance between providing the service to customers in an optimal, timely and cost-effective manner is the SODS-based solution. In this regard, Sprint-Florida requests a waiver until March 1, 1998 to provide 911 on suspension to 100% of our customers. Of the options available, revision to the SODS system appears to be both the least costly, and between the switch-based and system-based options can be implemented the quickest. Additionally, some of the older technology switches that are currently rule-complying are scheduled for a complete change out prior to the end of the first quarter of 1998. This means that the SODS solution will minimize the number of customers currently receiving 911 on suspension from being without the feature if the older-technology switch is replaced.

STATUTORY PURPOSE

21. Section 120.542(5)(D) requires the petitioner to show how the waiver or variance would serve the purposes of the underlying statute. It is difficult to quantify how the waiver would serve the purposes of the cited underlying statute. The only citation for an underlying statute is to Section 364.03(3). There is no reference in the statute to provision of 911 services. The statute provides that:

Every telecommunications company shall ... furnish to all persons who may apply and be reasonably entitled thereto suitable and proper telecommunications facilities and connections for telecommunications services and furnish telecommunications service as demanded upon terms to be approved by the commission.

Sprint-Florida contends that the waiver would meet the terms of the underlying statute in the

sense that the provision of 911 on suspension as soon as technologically and economically feasible is consistent with the "reasonable entitlement" of customers to "suitable and proper" connections. Petitioner would also note that pursuant to Section 364.051(1)(C) this section no longer applies to Sprint-Florida, Incorporated. Sprint-Florida, Incorporated (or its predecessors) elected price cap regulation on January 2, 1996. Rule 25-4.081, F.A.C. was effective January 6, 1997. Sprint-Florida's position of this aspect of the waiver recognizes the application of the rule on its face to the company. Nevertheless, this waiver request is filed without waiving any right to challenge the legality of the rule.

22. Until Sprint-Florida understands the exact nature of the underlying statute, this aspect of the waiver request cannot be fulfilled to the extent the only statutory authority is Section 364.03(3), to which Sprint-Florida is exempt. However, since the rule purports to apply to Sprint-Florida we must request this waiver at this time. At this time the company does not have sufficient knowledge to know whether the rule exceeds the commission's authority pursuant to Section 120.563(3) and 120.56(3). Regardless of any infirmities in Sprint-Florida's committed to finding a solution that will enable the company to meet the Rule's requirements.

DURATION

23. The waiver requested herein is temporary in nature. As set out above, Sprint-Florida needs a waiver until March 1, 1998. The Company commits to making its best efforts to expedite the work necessary to further shorten the duration of the waiver.

CONCLUSION

24. In consideration of the foregoing, Sprint-Florida requests a waiver of the Rule 25.4.081 requirement that 911 on suspension be provided in switches other than those listed in Attachment A. The waiver is requested until March 1, 1998. Furthermore, to the extent that the company has no solution in place prior to the change out of the Mt. Dora, Eustis, Lady Lake and St. Cloud switches, a waiver until March 1, 1998 is needed. On the outside chance that the

Okeechobee, Inverness and East Ft. Myers switches are changed out before the SODS revisions are in place, Petitioner requests a waiver until March 1, 1998 for those locations as well.

EXPEDITED CONSIDERATION REQUESTED

25. Petitioner recognizes that the Commission has 90 days to dispose of the request pursuant to section 120.542, Florida Statutes. However, since the waiver is needed prior to July 1, 1997, Sprint-Florida respectfully requests that consideration be given to addressing the Petition at the June 24, 1997 Agenda Conference. The company has made (and continues to make) a concerted effort to find a solution to this situation. Even so, circumstances did not allow this request to be filed any sooner.

WHEREFORE, Petitioner, Sprint-Florida, Incorporated respectfully requests that the Florida Public Service Commission grant the relief requested herein.

Respectfully Submitted,



Charles J. Rehwinkel
General Attorney
Sprint-Florida, Incorporated
P.O. Box 2214
Tallahassee, Florida 32301

ATTACHMENT A
DOCKET NO. 970509-TL
DATE: June 10, 1997

**CERTIFICATE OF SERVICE
DOCKET NO.**

I HEREBY CERTIFY that a true and correct copy of the foregoing
was served by _____ U.S. Mail Hand delivery this 29th day of
APRIL, 1997 to the following:

Will Cox, Esq.
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-7704

Ms. Diana Caldwell, Esq.
Florida Public Service Commission
Division of Appeals
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-7704



Charles J. Rehwinkel
Attorney for
Sprint-Florida, Incorporated
P.O. Box 2214, MC2565
Tallahassee, Florida 32316-2214
904/847-0244

WARM-LINE 911 CAPABLE SWITCHES

LOCATION	TYPE	CLASS	CUSTOMERS
BONITA SPRINGS	1210	HOST	15,730
BURNTSTORE RL	1210R	REMOTE	1,151
BUSHNELL	1210	HOST	6,885
CRYSTAL RIVER	1210	HOST	8,681
EAST FT. MYER	1210	HOST	9,434
EUSTIS *	1210	HOST	14,727
FT. MYER BCH	1210	HOST	11,258
INVERNESS	1210	HOST	21,504
KING CENTER RLS	1210R	REMOTE	1,900
LADY LAKE *	1210	HOST	8,185
MARCO ISLAND	1210	HOST	13,148
MT. DORA *	1210	HOST	11,582
MT. PLYMOUTH	1210R	REMOTE	1,745
OKEECHOBEE	1210	HOST	12,895
SUNCOAST	1210	HOST	6,766
SANIBEL CAPTIVA	1210	HOST	4,183
ST. CLOUD *	1210	HOST	15,547
WAUCHULA	1210	HOST	5,368
STARKE BROWN LEE	D10REM	REMOTE	325
DELLWOOD	D10REM	REMOTE	369
HOLT	D10REM	REMOTE	472
KINGSLEY LAKE	D10REM	REMOTE	374
LOVEDALE	D10REM	REMOTE	289
LAWTEY	D10REM	REMOTE	1,115
STARKE 102 MORGAN	D10REM	REMOTE	636
WOODVILLE	D10REM	REMOTE	1,064

* Schedule for change out due to permanent number portability ordered for the Orlando area

ATTACHMENT A
DOCKET NO. 970509-TL
DATE: June 10, 1997

Attachment B



Box 165000
Mail Code 5326
Altamonte Springs, Florida 32716-5000
Telephone: 407-889-6403
Fax: 407-884-7020

P. J. Merkle
Manager - Regulatory

May 3, 1996

Mr. Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Mr. D'Haeseleer:

Enclosed is the United Telephone Company of Florida (Sprint) and Central Telephone Company of Florida (Sprint) joint response to your Data Request dated April 2, 1996 regarding whether or not 911 service should be available to citizens when basic local telephone service has been disconnected.

Please contact me at (407) 889-6403 if there are any questions about our response.

Sincerely,



Peter J. Merkle

pjm
Enclosures



UNITED TELEPHONE COMPANY OF FLORIDA (SPRINT)
CENTRAL TELEPHONE COMPANY OF FLORIDA (SPRINT)

**RESPONSE TO THE FPSC DATA REQUEST
ON 911 AVAILABILITY TO DISCONNECTED LINES**

To facilitate the review of our joint response, we have repeated each question.

1. Do you believe requiring all providers of basic local telephone service to allow citizens to have access to 911 emergency services when basic telephone service has been disconnected for any reason is in the public interest?

1 (a) Explain why or why not.

RESPONSE: No. It would be administratively burdensome, excessively costly in terms of human and capital resources, and could generate inappropriate calls to 911 answering points for alleged emergencies to relay calls.

From an administrative perspective it would be impossible to accurately track why service was disconnected. The disconnect could be the result of a permanent move, a temporary move, a vacation service disconnect to be reconnected later (possibly to a different local service provider), or the elimination of one line at a location where multiple lines are in service.

If the disconnected service were in second home, a house being sold, or an apartment which may be unoccupied for some period of time, it would result in providing facilities to an unoccupied location. If the occupant, upon return, or the new owner or tenant subscribes to a different local service provider and the local service provider in a multi-tenant building uses the same intrabuilding facilities, it could result in a repair call - or if not using the same facility, providing 911 access to a premises that has service from another provider.

In 1995, Sprint's outward movement averaged 39,821 per month. Given the number of vacation homes and the number of homes with multiple lines, and a competitive market with multiple local service providers, administration of such a proposal would be extremely costly. And without an effective and efficient administration program, significant investments would be tied up to provide the proposed service to premises that were unoccupied, had other service (multiline customer), and/or had service from another local service provider.

Given the other alternatives that are available today to reach 911 services, e.g. free access from pay telephones, the proliferation of cellular service and neighbors with basic phone service, it would be an extreme misapplication of significant resources at the expense of ratepayers for an unidentified/ value.

The benefit for a small subset of potential customers does not justify the cost burden to existing ratepayers or to the public at large.

2. Does your company presently have a method in place which allows access to 911 emergency services when basic telephone service has been disconnected for nonpayment?

2 (a) If yes, provide details. For example, does it make a difference whether service has been temporarily or permanently disconnected?

RESPONSE: No. Sprint does not currently make a distinction between temporary or permanent disconnect with regard to the availability to access 911.

3. Does your company presently have a method in place which allows access to 911 emergency services when basic telephone service has been disconnected for reasons other than nonpayment (e.g. voluntary suspension of service during vacation)?

3 (a) If yes, describe what steps must be taken in order to allow a disconnected line to continue to have 911 outgoing call capability.

3 (b) If yes, does the 911 operator have the ability to call back to a line that is under voluntary suspension of service?

3 (c) If yes, is access to the business office available?

RESPONSE: No.

4. Please provide an estimate of the cost (system-wide and per occasion) to provide access to 911 emergency services to citizens when basic telephone service has been disconnected for any reason.

RESPONSE: The short time period allowed to respond has not been sufficient to fully research all the costs that may be associated with this proposal.

While difficult to substantiate, a high level, order of magnitude, approach to determining costs can be developed as follows:

The budgeted hardware cost, both COE and OSP, for providing a local loop is \$1,781 per line. If a residential location is to have the ability to call 911, everything must be in place to make the call and it cannot be used for any other customer. Essentially, all disconnects would be basically left in service for the life of the residential structure, e.g., home, apartment, trailer, etc. The total hardware cost would be determined based on the number of disconnects, churn rate, etc.

The 1995 average monthly outward movement was 39,821. The difference between Installed and Working lines today is 238,863, or approximately 12% of total installed lines. If churn did not occur again on the same lines, then this is only a 6 month cushion before all facilities are exhausted. Furthermore, there would be no facilities for new growth. Now, access line gain has been averaging about 74,000 per year for the last 5 years. It is estimated that approximately 60% of this is to new residential and business structures; the other 40% is due to additional lines, e.g., faxes, second lines, etc. Also, it is reasonable to assume that churn will occur on a portion of the same lines, possibly more than once a year, e.g., in apartments and trailer parks. For purposes of this cost estimate, we assume 25% of the cushion, or 60,000 lines would be required to implement this program. This equates to a capital investment of \$106,860,000.

Additionally, software will be needed to prevent unrestricted dialing. Without this, customers could ask to be disconnected and still have full telephone service. Another option is a "warm line" or "ring down" that would auto dial 911 when the phone goes off hook. That is not a good option since the family dog could call 911 at any time. Based on some earlier research on "warmlines" or "ring down" service, the software cost for the Nortel DMS 100/200 host switches is estimated at approximately \$90,000/host switch. In addition, there may be a single R&D charge of approximately \$500,000. Cost estimates from our vendors have been requested for our other switch types: the DMS 10s, and the AT&T 5ESSes, as well as Alcatel for an "expanded warm line" capable of dialing 3 or 4 specific numbers, e.g., 911, business office, operator.

Sprint currently has 69 host offices. Using the DMS 100/200 software costs to provide a surrogate estimate for all switch types, then our estimated software costs are \$ 6.7 million.

The current company CRB billing systems as well as other management systems, such as the customer service and repair service and directory assistance data bases, as well as facility and number assignment systems will need to be enhanced or modified to maintain records on the 911 service for disconnects. Experience has shown that changes to these systems has always proved to be lengthy in time and very expensive.

Additional costs would be incurred in service order activity required to provide the 911 service at the time of disconnect.

Re-establishment of service to presently disconnected locations will be required for universal implementation. No estimates are available for this substantial effort.

Another cost/condition not yet resolved is that of a telephone set itself. Just making the line 911 accessible will not be sufficient if the resident does not have a telephone to plug into the jack.

5. If the Commission were to require 911 access capability to disconnected access lines, should this capability be made available to everyone or only to specifically identified customers (i.e. those residing in low income housing, nursing homes, student housing, childcare centers)? Please explain your answer.

RESPONSE: The benefit for a small subset of potential customers does not justify the cost burden to existing ratepayers or to the public at large.

6. If your company provides basic telephone service in any state(s) other than Florida, does your company presently have a method in place which allows access to 911 emergency services when basic telephone service has been disconnected in those states?

6 (a) If yes, provide details for each state.

RESPONSE: The local telecommunication division of Sprint does not have any operating companies providing this type of service.

7. If known, please identify any states or other providers of basic local telephone service that have a policy in place which allows access to 911 emergency services when basic telephone service has been disconnected.

RESPONSE: We have no information to provide on the availability of this service by other providers of basic telephone service.

8. Would maintaining 911 capability on access lines that have been completely disconnected inhibit the company's ability to reassign telephone numbers, inhibit number portability, or cause a more rapid depletion of available numbers?

8 (a) If yes, provide details and estimate any associated costs.

RESPONSE: Yes, this proposal would significantly hasten the use of telephone numbers and would severely curtail the company's ability to re-assign telephone numbers. Today, numbers taken out of service go into an "aging process" before they are re-assigned. This is done as a courtesy to new customers who are getting these numbers to help prevent mistaken calls (calls made to the old number not knowing that the number has been re-assigned). There are benefits to the company in terms of fraud control with regard to yellow page advertising and customer billing. Specific studies regarding impact to possible NPA splits have not been made. However, with a substantial number of additional numbers continued to being used would suggest that the

exhaust of numbers would be sooner than otherwise would be expected.

At this time, we do not believe it would inhibit telephone number portability, but the continued use of the ported numbers would certainly increase the data base costs associated with the maintenance of those numbers.

9. Would there be additional costs not included in above estimates for the 911 center to have call back capability to the number?

9 (a) If yes, provide details and estimates.

RESPONSE: No and yes. If required to provide such a service, we envision provisioning the 911 accessible service such that the line will have its own unique telephone number which will be resident in the 911 data base with its associated physical address. Each "911" line will be similar to all POTS lines with regard to 911. However, identification that the line/number is a disconnected location will require extensive data transmittal and storage changes for both the telephone service providers and the counties subscribing to the service.

The provision of call back for the disconnected 911 service will allow for any calls to that telephone number to be completed. There are potentially will two problems created by this scenario. One is the concern that there will be fraudulent calls to 911 bureaus as customers are attempting to learn the identity of the 911 service telephone number. Second problem will be how to prevent free incoming calls to the 911 line if the customers can obtain the number.

10. Suggest methods of funding that would cover the cost of maintaining access to 911 emergency services when basic telephone service has been disconnected for any reason.

RESPONSE: Without knowing the total magnitude of costs, it is very difficult to make suggestions as to how the program might be funded. However since the service is basically in response to a social situation, and involves locations without telephone service, the most appropriate source is an allocation from Florida's State General Revenues.

11. Should the Commission require providers of local exchange telephone service to offer their customers the option of subscribing to 911 service only?

11 (a) If yes, what should the charge be?

11 (b) If no, why not?

RESPONSE: No. The cost to provide the 911 service is essentially the same as basic local service. There is no rational benefit for a customer to pay for local service without outward dialing and without the ability to receive incoming calls. Hence, there would be no demand for this service.

12. Describe any impediments to implementing a method for maintaining access to 911 emergency services when basic telephone service has been disconnected for any reason.

In addition to the requirement for the additional investment in inside and outside facilities and human resources previously described, initial implementation activities would be directed at defining requirements for software development and determining cost and implementation timelines. Implementation would require developing systems and procedures to implement and administer the plan on an ongoing basis. Procedures would need to be established to determine why customers disconnected to avoid providing the service where it is not necessary, e.g. vacation homes, vacant premises, premises with service from another vendor, or premises with another line. For example, a customer disconnecting a fax line at home would have access to 911 on their primary service. Customers do not necessarily communicate why they are disconnecting and may not be receptive to being questioned about their future plans.

Forecast of the additional facilities, required manpower for maintenance of additional facilities, and additional service representative requirements will be required to assess funding needs. Other administrative and operational support systems would also need to be modified.

13. After what period of time do you believe total and permanent disconnection should occur?

RESPONSE: If, in fact, the value of the service can be justified at all, a limitation on this time period is not relevant.

14. Describe any other factors you believe should be considered prior to implementing a method for maintaining access to 911 emergency services when basic telephone service has been disconnected for any reason.

RESPONSE: The upcoming implementation of the provisions of the Telecommunications Act of 1996 and current FCC investigations into the provision and funding of Universal Service will be creating changing conditions in the provisioning and pricing of local telephone service. The creation of a new type limited service such as "911 on disconnect" will cause customer confusion and will be counter productive to the concept of Universal Service.

In addition to the capital and human resource costs explored in the responses to previous questions, Sprint offers the following comments regarding the implementation of the

proposed 911 on disconnect service:

1. When telephone service is disconnected but people remaining living in the location, the chances are the non working set will become a nuisance and will be put away until that time that service is to be restored.
2. With the lack of revenue producing "normal service" on a facility, it is quite possible that after service has been out in an area due to perhaps unusual weather, a fire or accident the 911 only service lines will not get reported out of service and may not get restored in the same timely manner as normal service. The result is the service may not be always available as anticipated.
3. In locations associated with a disconnect due to subscribers moving from a location, the new tenants may move in without a telephone set. Again the 911 dial tone may be there, but not usable to the people living in the location.
4. In the new competitive environment it will be impossible for the LEC to have knowledge and control over whether service exists or does not exist in all residential locations in their territory. Lacking universal application, it is not appropriate for some to have the service and others be excluded.
5. The costs to reinstall the presently disconnected locations are expected to be very high. Therefore the LEC should not be expected to perform this catch up if the service were to be instituted. Hence there would be a group of dispersed locations with and without the service. As was discussed in item 4. above, anything less than universal application should not be considered.
6. The provision of 911 only service is the result of a socioeconomic situation which is better addressed with the state government welfare program than creating a burden on selected members of a competitive business environment.