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February 21, 1996

IN REPLY REFER TO:

Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Resolution of Petition(s) to establish nondiscriminatory rates, terms and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes; Docket No. 950984-TP

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of Sprint United/Centel's Rebuttal Testimony and Exhibit of Sandra A. Khazraee in the above styled docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

J. Jeffry Wahlen

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FPSC-BUREAU OF RECORDS

JJW/bjm
Enclosures
cc: All Parties of Record (w/encls.)

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CERTIFICATE OF SERVICE
Docket No. 950984-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail, hand delivery (*) or express mail (**) this 21st day of February, 1996, to the following:

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UNITED TELEPHONE COMPANY
OF FLORIDA
CENTRAL TELEPHONE COMPANY
OF FLORIDA
DOCKET NO. 950984-TP
FILED: FEBRUARY 21, 1996

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY

OF

SANDRA A. KHAZRAEE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Sandra A. Khazraee. My business address is Sprint/United Telephone of Florida, 555 Lake Border Drive, Apopka, Florida 32753.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCES.

A. I received a Bachelor of Science Degree in Mathematics from McNeese State University, Lake Charles, LA. Over the past 19 years, I have attended numerous industry schools and seminars covering a variety of technical, economic and regulatory issues.

I was an Outside Plant Engineer with South Central Bell from May 1977 to August 1981. In 1981, I transferred to Pacific Bell where I worked as an Outside Plant Engineer, Planning Engineer and Wire Center Planner (Long Range Switch Planner).

In July 1986 I began working as a Long Range Network Planner at United Telephone of Florida. Since then, I have been Technology Planner, Supervising Engineer of Long Range Planning, Product Evaluation and Pricing Manager, and Costing Manager.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. My current responsibilities include directing the activities necessary to develop cost studies for all business cases and tariff filings.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I am testifying on behalf of United Telephone Company of Florida ("Sprint/United") and Central Telephone Company of Florida ("Sprint/Centel"). These two companies will be referred to collectively as "Sprint-United/Centel" or the "Companies."

The purpose of my testimony is to respond to points raised

in the direct testimony of Mr. Timothy T. Devine filed on behalf of Metropolitan Fiber Systems of Florida, Inc. ("MFS") and Dr. Nina W. Cornell on behalf of MCI Metro Access Transmission Services, Inc. ("MCImetro").

Q. HAVE YOU PREPARED AN EXHIBIT TO YOUR REBUTTAL TESTIMONY?

A. YES. Exhibit SAK-1 is a composite exhibit consisting of two documents. The first document has seven pages and the second has two pages. These documents are described in my testimony.

Q. DO THE COMPANIES SUPPORT LOOP UNBUNDLING?

A. Yes. Sprint-United/Centel support unbundling local service between two components, loop and port.

Q. HOW DO THE COMPANIES DEFINE LOOPS AND PORTS?

A. A loop consists of an electrical or transmission path between the network interface located at the customer's premises and the vertical side of the main distributing frame (or other designated Company frame) at the serving central office. Loops are defined by the electrical interface rather than the type of facility used.

The serving central office is comprised of a single central office switch providing exchange and long distance service to the general public. A central office switch is designed for terminating and interconnecting lines and trunks. Generally restricted to digital hosts, a switching remote wholly serving an exchange is considered a central office. Where there are multiple central office switches in a single location, each switch is a discrete termination hub which provides call processing, switching, and interconnection of communication paths for those lines and trunks terminated on it.

A port is the capability derived from the central office switch hardware and software required to permit customers to transmit or receive information over the Company's public switched network. A port provides service enabling and network features and functionality, such as translations, a telephone number, network access also provides access to operator services, E911, usage, and switched access usage services.

Q. ARE THE COMPANIES PREPARED TO OFFER ALL CLASSES OF SERVICE AS SPECIFIED BY MFS IN ITS PETITION?

A. Sprint currently has two wire and four wire analog voice grade loops as well as data loops available in the Special Access tariff. These are the unbundled loops Sprint-United/Centel are currently proposing to offer. It is appropriate to offer these from the existing special access tariff because these unbundled facilities do not terminate at the Companies' switches. Rather, they are provisioned and maintained in the same way as a dedicated special access line.

Although it would be most appropriate to develop rates specific to the various grades of unbundled loops based on grade of service and length of loop, to do so would require that all potential users of such loops provide forecasts of required needs to allow accurate determination of cost. In the absence of such forecasts, the use of the existing special access tariff rates is most appropriate. These rates represent an average where contribution will vary based on the volume and distance associated with individual customers' services.

The Companies also proposes to offer interoffice transport and multiplexing to the ALECs from the appropriate special access tariff. Currently, all other carriers (e.g., AAVs) purchase transport and multiplexing from the special access

tariff.

Ports are not currently tariffed but the various grades of ports can be offered after the Companies have developed a tariff and worked out operational issues. However, Basic Rate ISDN and Primary Rate ISDN are not ubiquitously available throughout the Companies' networks and could only be offered where available to the Companies' own end users or with additional transport required to extend the service to other locations.

Sprint-United/Centel does not plan to offer sub-loop unbundling or connection of unbundled loops to unbundled ports.

Q. DO YOU AGREE THAT THE COMPANIES SHOULD BE REQUIRED TO OFFER COLLOCATION FOR INTERCONNECTION TO UNBUNDLED LINKS?

A. At this time our tariff only provides for virtual collocation as specified in Expanded Interconnection and this is the preferred collocation arrangement. Virtual collocation is subject to the availability of space and facilities. These requests would be handled on a first come, first serve basis.

Q. DO YOU BELIEVE THE PRICE OF THE UNBUNDLED ELEMENTS SHOULD BE LESS THAN OR EQUAL TO THE PRICE OF THE TARIFFED SERVICES THEY ARE REPLACING.

A. No. See Mr. Poag's direct testimony for a discussion of the pricing proposals.

Q. WILL THE COMPANIES PROVIDE THE LOOP CONCENTRATION EQUIPMENT REQUESTED BY MFS?

A. First, let me explain that the Companies will work with all local interconnectors to provide unbundled services where it is reasonable and technologically efficient to do so. However, as I explain below, there are many technical and operational issues that need to be addressed relative to the requested loop concentration unbundling.

For example, most of the concentrator devices installed in our network must be dedicated to one host switch and cannot be connected to another carrier's switch. Since they are already connected to one of the Companies' switches, this means that another concentrator would have to be installed for an ALEC, like MFS. Many of the Companies' concentrators are located in cabinets or controlled environmental vaults ("CEV") that have no spare room for

additional equipment to be installed. The cost of installing additional concentrators can, for those reasons, be significant.

Also, there may be space restrictions in the rights of way and property owners may resist a pedestal and/or cabinet graveyard in the right of way or easement. This could especially be an issue if multiple ALECs wanted concentration service at the same location.

It appears MFS is also requesting concentration between the ALEC customer's serving wire center and the ALEC's switch. This is interoffice transport and would be handled via the existing tariffed rates.

Q. PLEASE DESCRIBE YOUR EXHIBIT.

A. My exhibit (SAK-1) consists of two documents. The first document is diagrams that illustrate potential solutions for providers with unbundled loops, based on a variety of technologies. This document reflects the Companies' proposal for the basic technical arrangements necessary to provide unbundled loops.

The second document contains diagrams that document the

footprint of a typical CEV and concentrator cabinet (OPM). This document reflects the technical arrangements under which the Companies would expect to provide loop concentration equipment. Provision of loop concentration equipment would be subject to resolution of the concerns discussed above.

Q. SHOULD THE COMPANIES BE REQUIRED TO "PERMIT ANY CUSTOMER TO CONVERT ITS BUNDLED SERVICE TO AN UNBUNDLED SERVICE AND ASSIGN SUCH SERVICE TO MFS-FL, WITH NO PENALTIES, ROLL-OVER, TERMINATION, OR CONVERSION CHARGES TO MFS-FL OR THE CUSTOMER" AS SUGGESTED BY MFS?

A. No. There are nonrecurring costs involved in making the changes necessary in the network and the records to change an end user's service. The Companies are required to recover that cost from their own end users and should be allowed to recover direct costs from direct cost causers including ALECs like MFS.

Q. SHOULD THE COMPANIES BE REQUIRED TO PROVIDE "MFS-FL WITH AN APPROPRIATE ON-LINE ELECTRONIC FILE TRANSFER ARRANGEMENT BY WHICH MFS-FL MAY PLACE, VERIFY, AND RECEIVE CONFIRMATION ON ORDERS FOR UNBUNDLED ELEMENTS, AND ISSUE AND TRACK TROUBLE-TICKET AND REPAIR REQUESTS ASSOCIATED WITH

UNBUNDLED ELEMENTS" AS SUGGESTED BY MFS?

A. Clearly, the ability to transfer information electronically between the Companies and all ALECs competing with the Companies would be beneficial to both Sprint-United/Centel and the ALECs. However, Sprint-United/Centel should not be required to develop new systems simply to allow electronic interconnection in the manner desired by each ALEC. If the existing systems can be used to effect such transfers of information or if minor modifications can be made to the existing systems, then the Companies would be willing to negotiate such transfers with the ALECs.

Q. DO YOU AGREE THAT TSLRIC IS THE APPROPRIATE PRICE FOR THE UNBUNDLED LOOP?

A. No. See Mr. Poag's Direct Testimony for a discussion on appropriate pricing.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

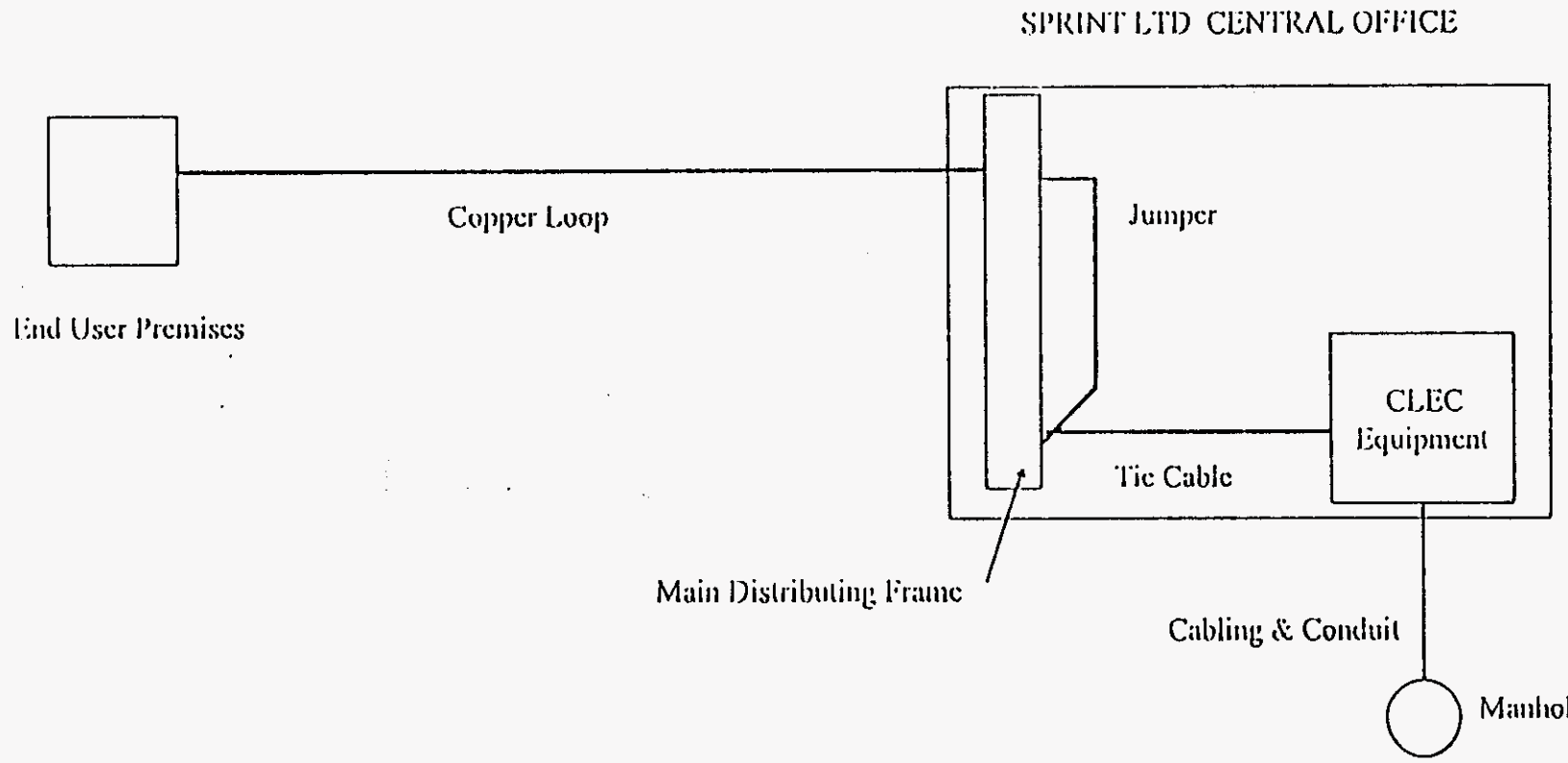
A. Yes.

UNITED/CENTEL
DOCKET NO. 950984-TP
REBUTTAL TESTIMONY
SANDRA A. KHAZRAEE

COMPOSITE EXHIBIT OF

SANDRA A. KHAZRAEE

LOCAL INTERCONNECTION - UNBUNDLED LOOP
COPPER FACILITY



1. This scenario applies to all copper loops, including those provisioned with cross connect devices.
2. The CLEC collocates in the Sprint central office via expanded interconnection.
3. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
4. When a loop is requested, Sprint runs a jumper from where the end user loop terminates on the vertical side of the MDF to the tie cable connected to the CLEC equipment.

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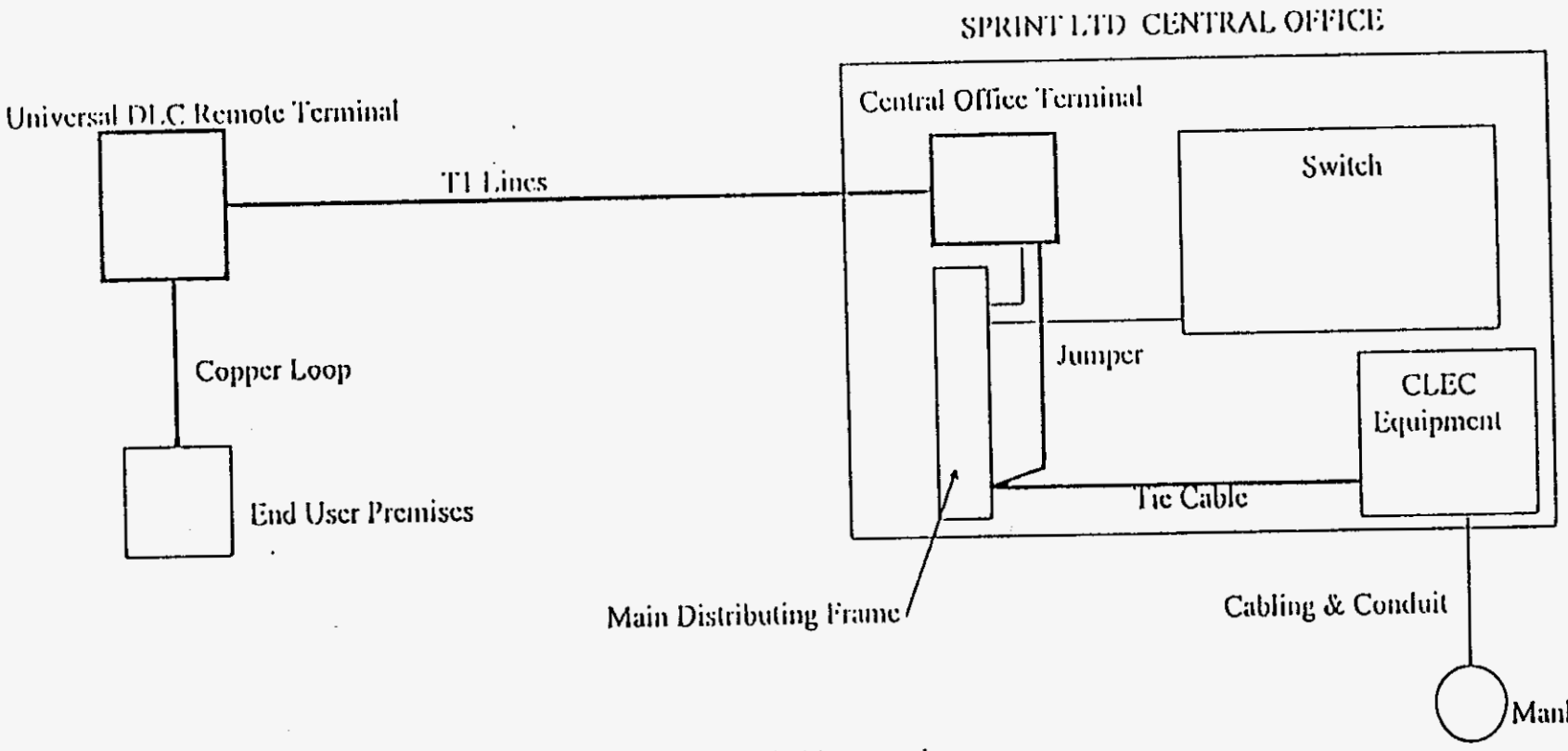
SANDRA A. KHAZRAEE
EXHIBIT SAK-1
DOCUMENT 1
Page 1 of 7

LOCAL INTERCONNECTION - UNBUNDLED LOOP
UNIVERSAL DIGITAL LOOP CARRIER



1. This scenario applies to loops provisioned with a universal digital loop carrier.
2. Under normal circumstances DS0 lines run from the central office terminal directly to the Sprint switch.
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
5. When a loop is requested, Sprint runs a jumper from the DS0 line exiting the Central Office Terminal to the CLEC tie cable termination on the main distributing frame.

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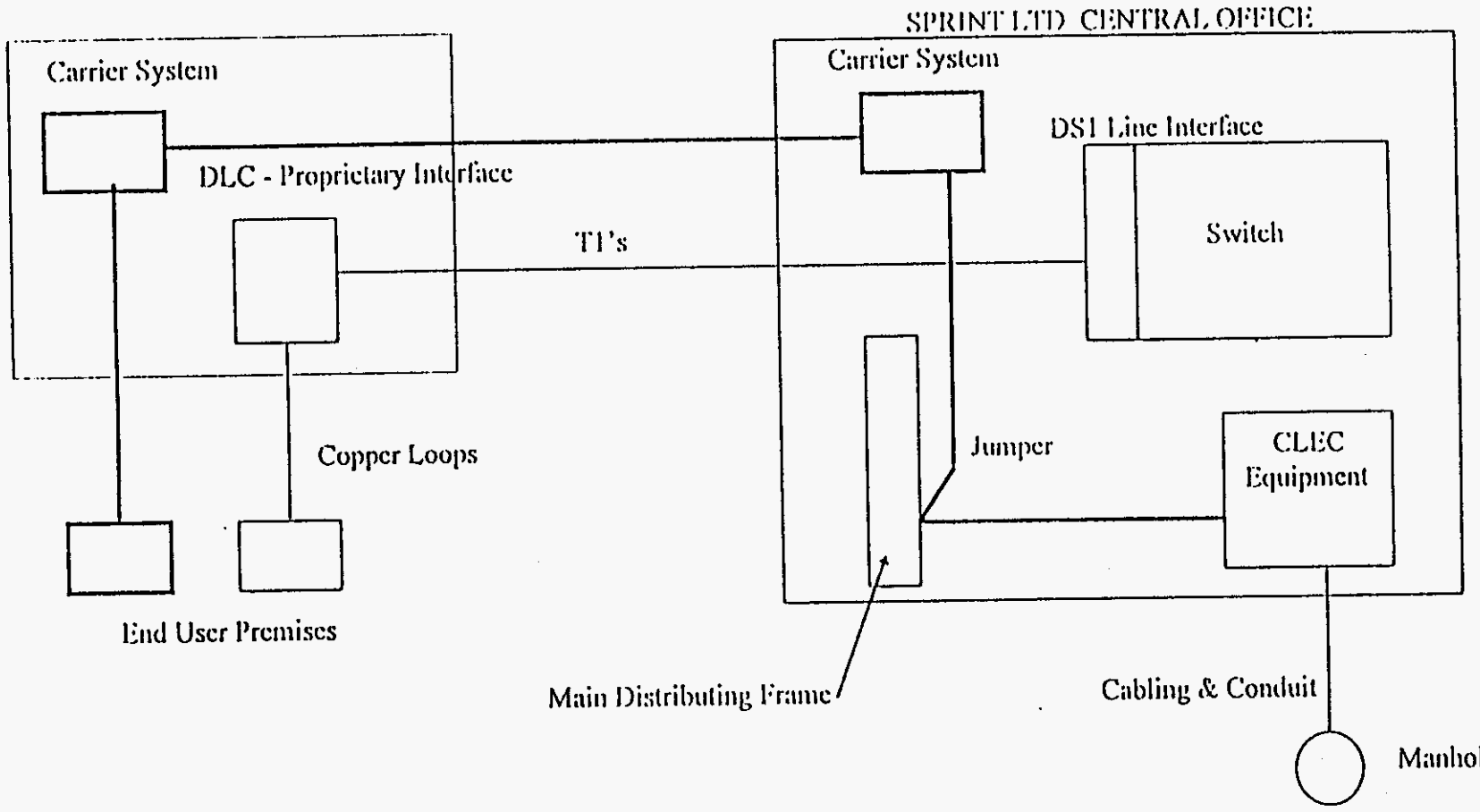
SANDRA A. KHAZRAEE
EXHIBIT SAK-1
DOCUMENT 1
Page 2 of 7

LOCAL INTERCONNECTION - UNBUNDLED LOOP
DIGITAL LOOP CARRIER - Proprietary Direct Interface



1. This scenario applies to loops provisioned with digital loop carriers utilizing proprietary interfaces.
2. Under normal circumstances T1 lines run from the remote switch directly into the switch via a DS1 line interface.
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
5. Sprint must install carrier equipment, at the location of the DLC, to provide a DS0 at the central office.
6. When a loop is requested, Sprint runs a jumper from the DS0 line exiting the carrier equipment to the CLEC tie cable termination on the main distributing frame. A technician must be dispatched to move the loop from the DLC to the carrier system.
7. The service can be provisioned via copper, if spare capacity exists in the copper cable feeding the DLC.

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EXHIBIT SAK-1
DOCUMENT 1
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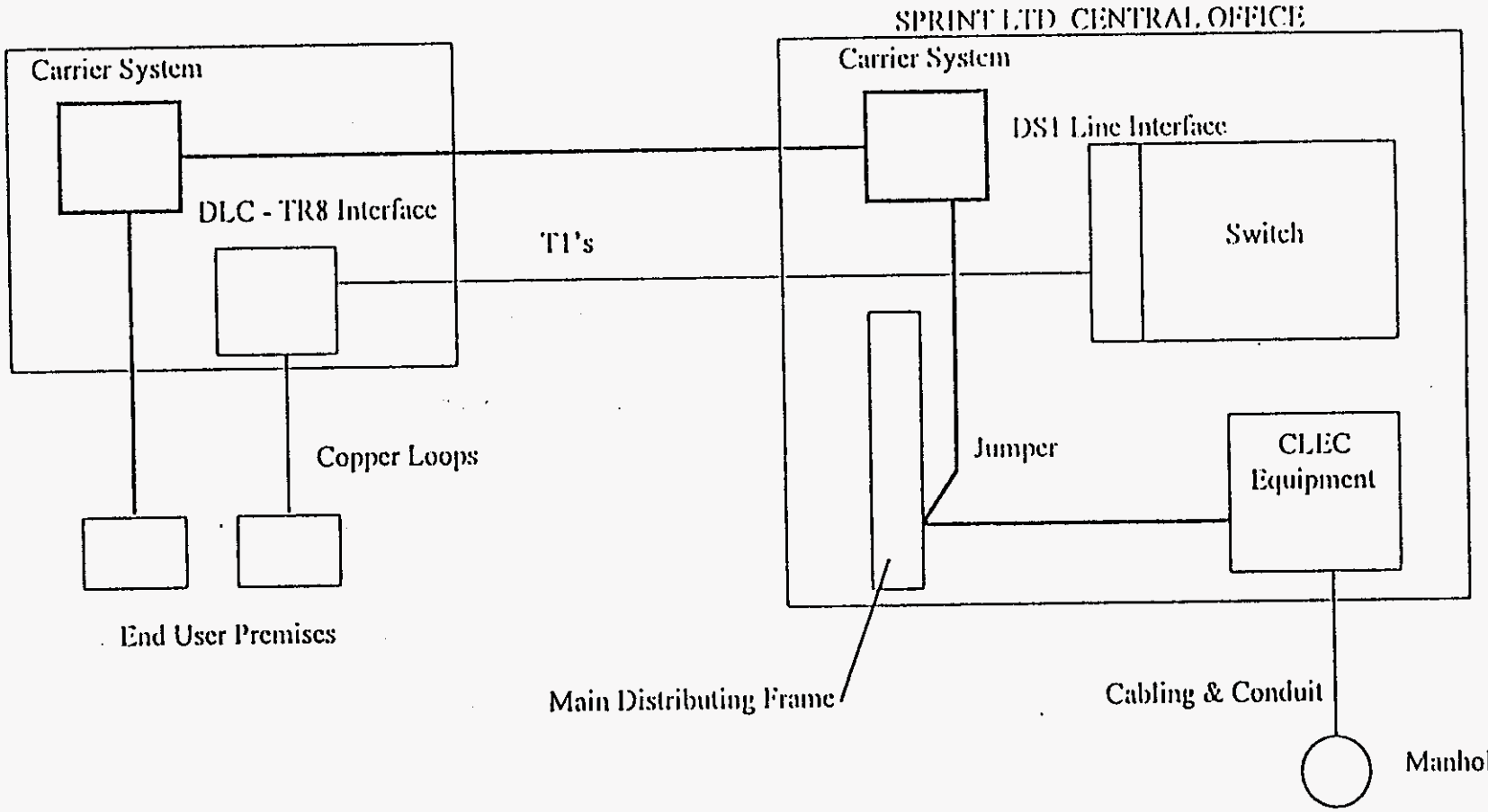
LOCAL INTERCONNECTION - UNBUNDLED LOOP
DIGITAL LOOP CARRIER - TR8 Interface



1. This scenario applies to loops provisioned with digital loop carriers utilizing a TR8 interface (SLC96, SLC5, DSC*S).
2. Under normal circumstances T1 lines run from the DLC directly into the switch via a DS1 line interface.
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
5. Sprint must install carrier equipment, at the location of the DLC, to provide a DS0 at the central office.
6. When a loop is requested, Sprint runs a jumper from the DS0 line exiting the carrier equipment to the CLEC tie cable termination on the main distributing frame. A technician must be dispatched to move the loop from the DLC to the carrier system.
7. The service can be provisioned via copper, if spare capacity exists in the copper cable feeding the DLC.

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DOCUMENT 1
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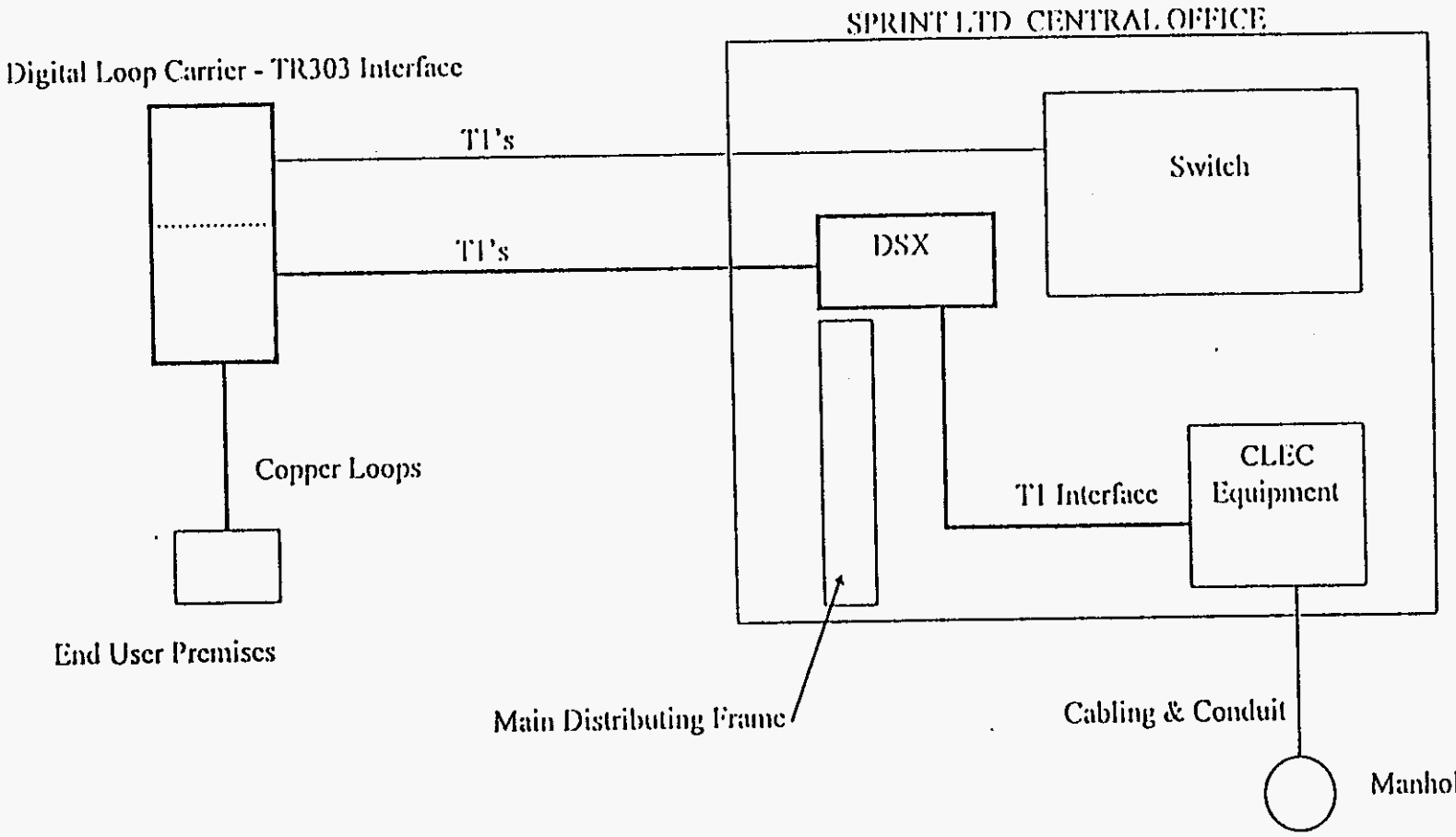
LOCAL INTERCONNECTION - UNBUNDLED LOOP
DIGITAL LOOP CARRIER - TR303 Interface



1. This scenario applies to loops provisioned with digital loop carriers utilizing a TR303 interface (SLC2000, DSC*S,Access Node).
2. Under normal circumstances T1 lines run from the DLC directly into the switch .
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. The new TR303 interface allows devices to be directly connected to at least 2 hosts. Untested software may allow up to 4 hosts to be connected. A minimum of 2 T1's are required to allow this type of interconnection. The CLEC would therefore have to lease a minimum of 2 T1's plus some charge for the DLC in addition to the copper loops. Sprint LTD could move the copper loops from the Sprint side of the DLC to the CLEC side remotely via the software.

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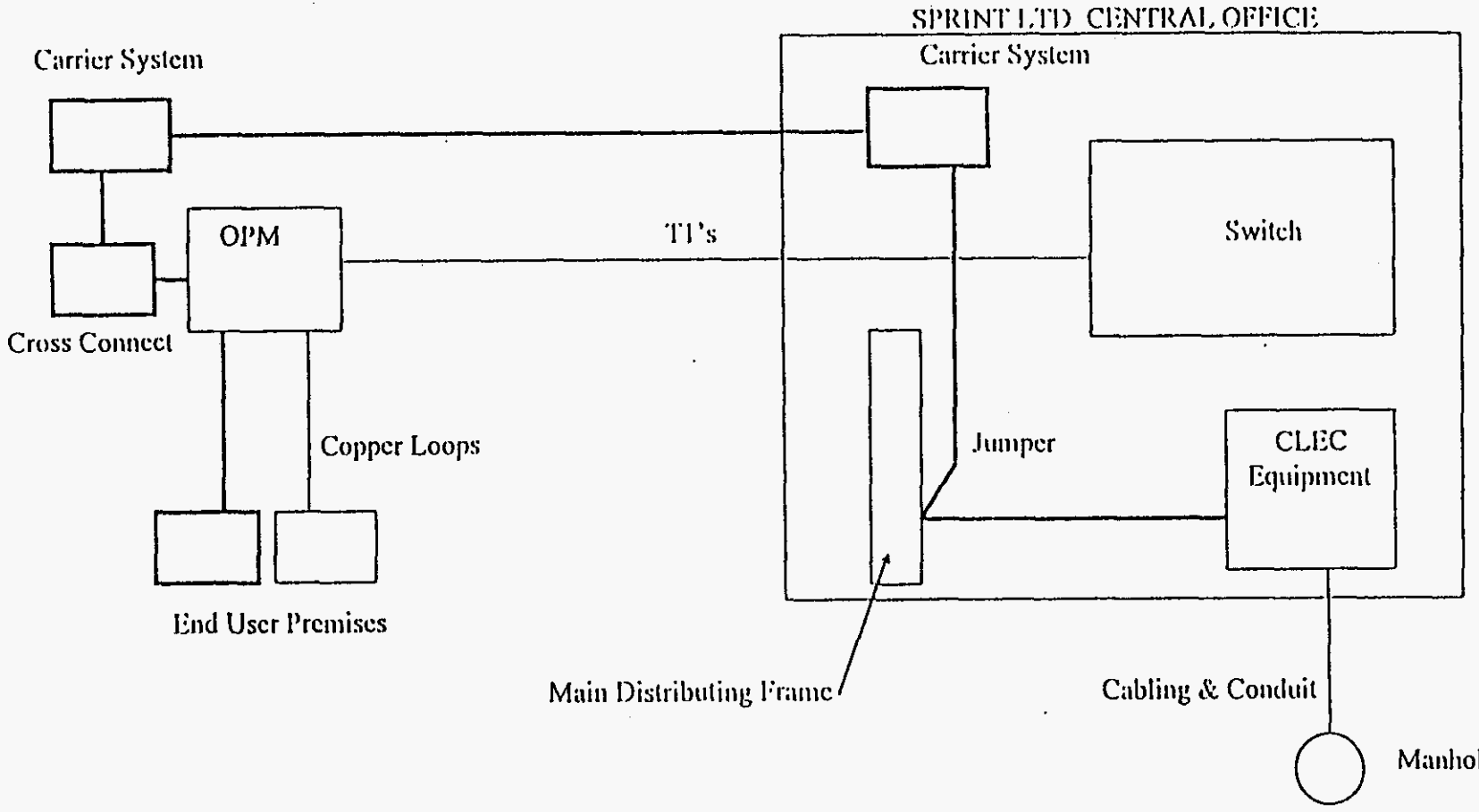
SANDRA A. KHAZRAEE
EXHIBIT SAK-1
DOCUMENT 1
Page 5 of 7

LOCAL INTERCONNECTION - UNBUNDLED LOOP
REMOTE SWITCH in an EXTERNAL CABINET - OPM



1. This scenario applies to loops provisioned through remote switches installed in external cabinets.
2. Under normal circumstances T1 lines run from the remote switch directly into the host switch.
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
5. Sprint must install carrier equipment, at the location of the OPM, in another cabinet, to provide a DS0 at the central office.
6. When a loop is requested, Sprint runs a jumper from the DS0 line exiting the carrier equipment to the CLEC tie cable termination on the main distributing frame. A technician must be dispatched to move the loop from the OPM to the carrier system.
7. The service can be provisioned via copper, if spare capacity exists in the copper cable feeding the DLC.

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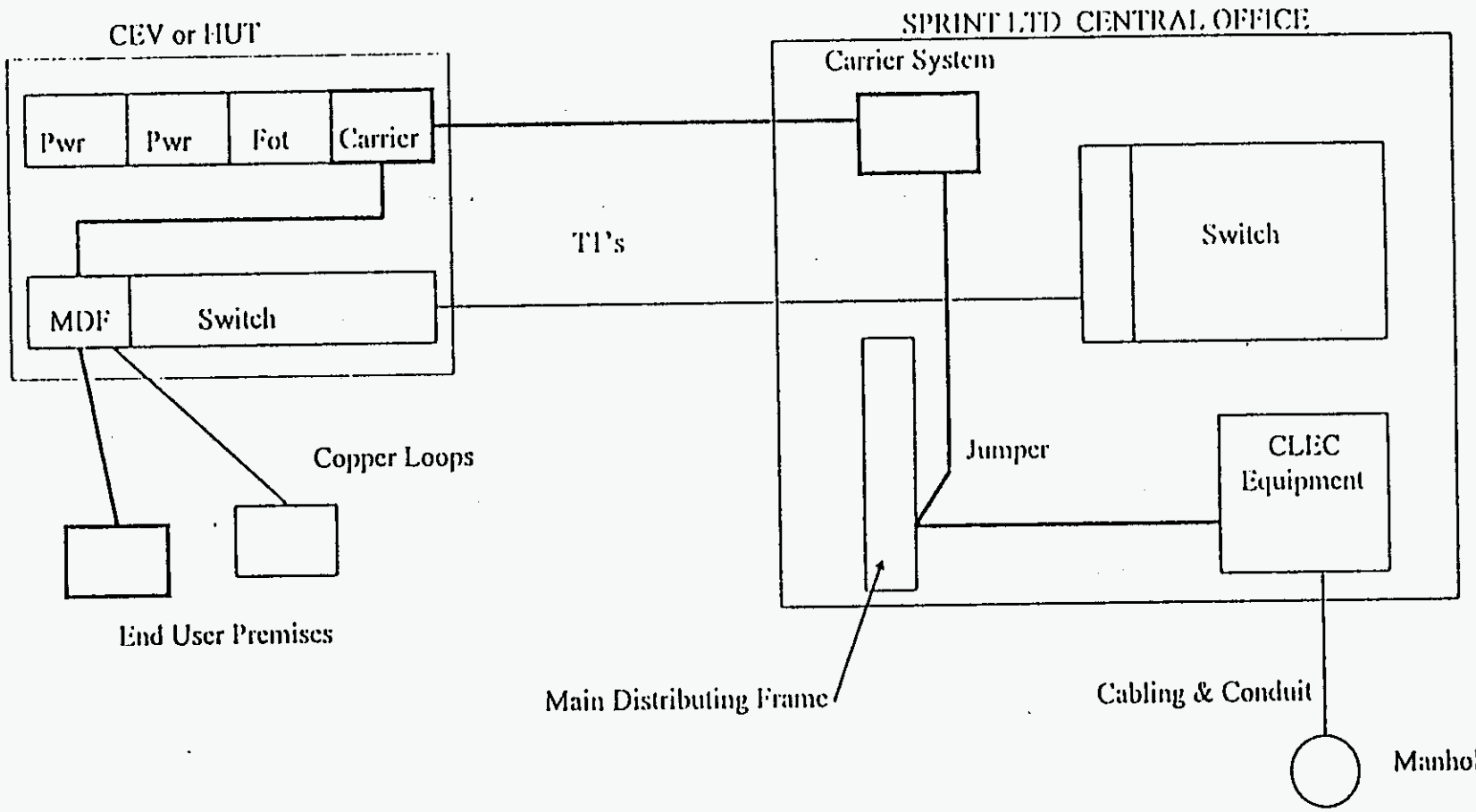
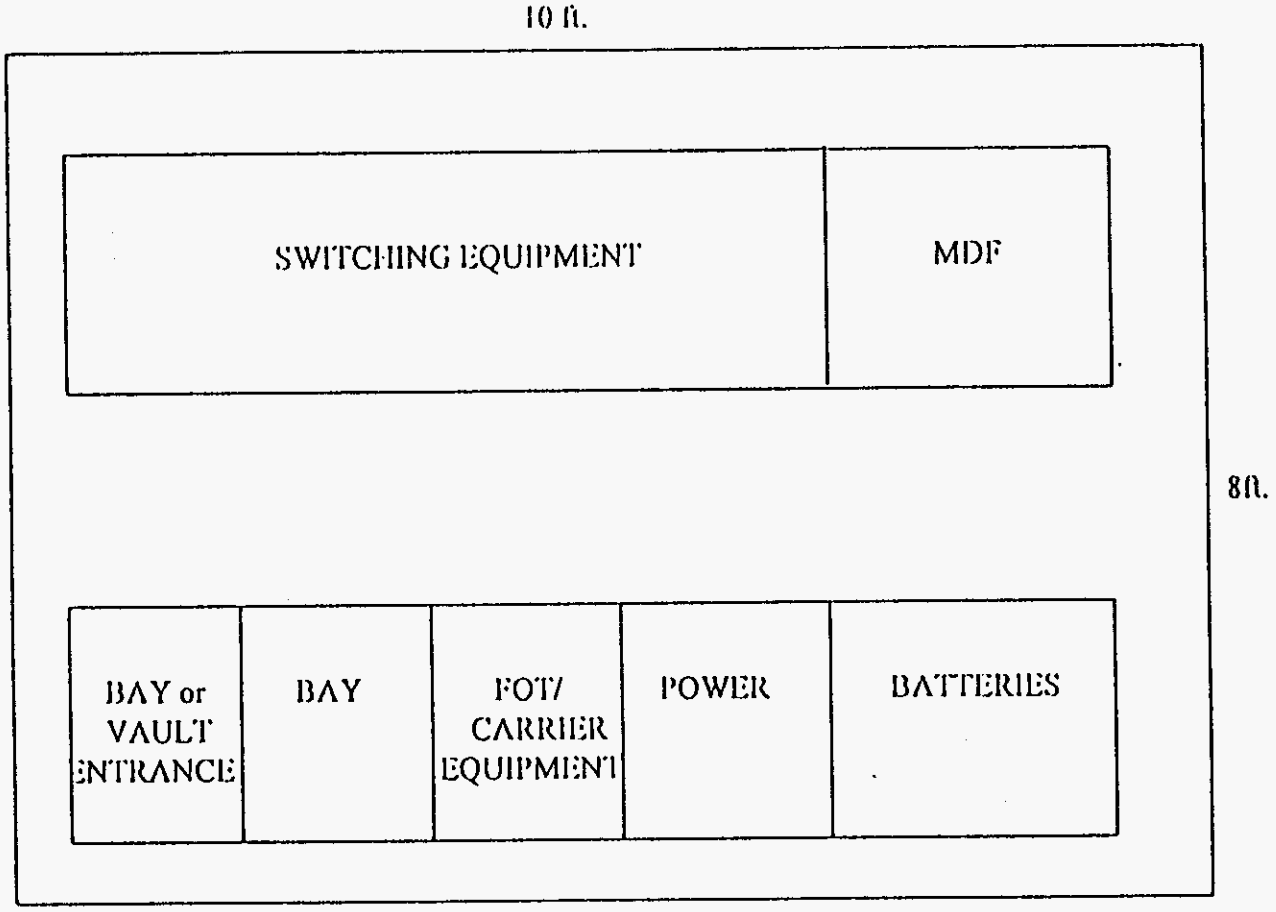
EXHIBIT SAK-1
DOCUMENT 1
Page 6 of 7

LOCAL INTERCONNECTION - UNBUNDLED LOOP
REMOTE SWITCH in an CEV or Hut



1. This scenario applies to loops provisioned through remote switches installed in a hut or controlled environmental vault.
2. Under normal circumstances T1 lines run from the remote switch directly into the host switch.
3. The CLEC collocates in the Sprint central office via expanded interconnection.
4. A tie cable, installed by Sprint, extends from the CLEC space to a section on the MDF dedicated to CLEC interconnection.
5. Sprint must install carrier equipment, at the location of the remote, to provide a DS0 at the central office.
6. When a loop is requested, Sprint runs a jumper from the DS0 line exiting the carrier equipment to the CLEC tie cable termination on the main distributing frame. A technician must be dispatched to move the loop to the carrier system.
7. The service can be provisioned via copper, if spare capacity exists in the copper cable feeding the DLC.

REMOTE SWITCH IN A HUT OR ENVIRONMENTAL VAULT (RSC, RLCM, RSM)
TYPICAL LAYOUT



Huts or controlled environmental vaults have limited space to allow additional equipment for CLEC interconnection. There are one to two bays available, depending upon the services being offered. These switches serve from approximately 2000-4500 customers, making it impossible to add enough additional equipment to serve a substantial number of customers that transfer to a CLEC.

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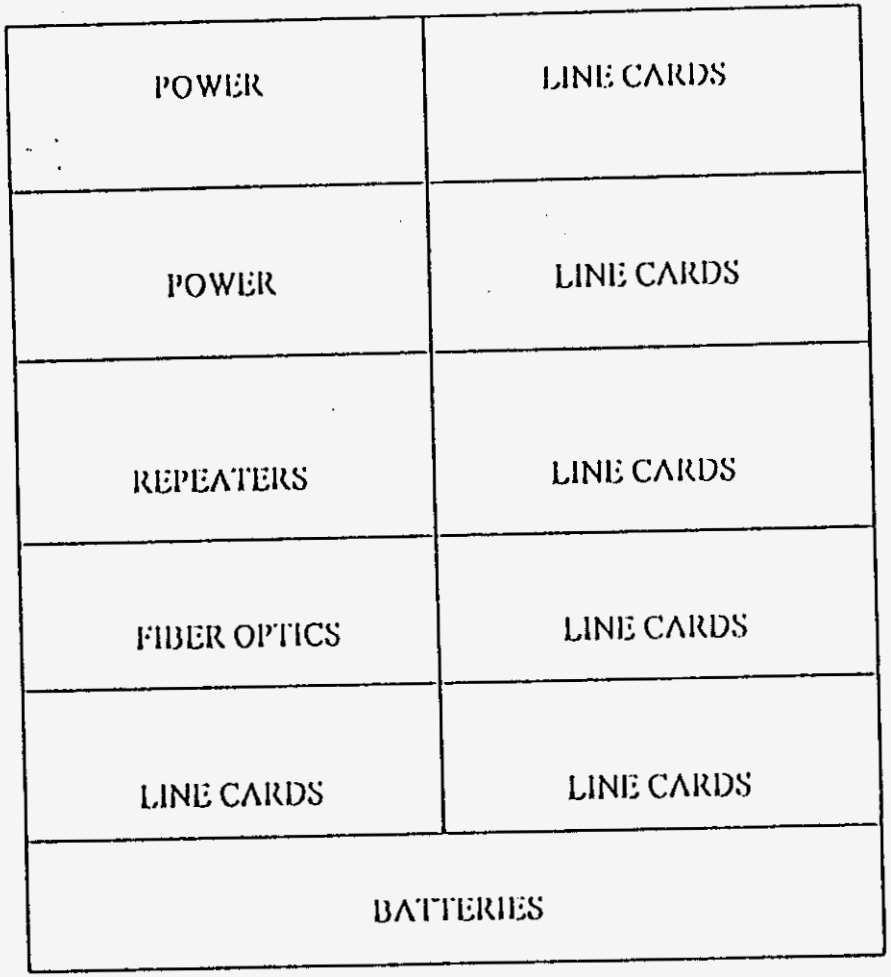
EXHIBIT SAK-1
DOCUMENT 2.
Page 1 of 2

REMOTE SWITCH IN AN EXTERNAL CABINET (OPM)
TYPICAL LAYOUT



Remote Switches installed in external cabinets (OPM's) do not have any space available to allow CLEC interconnection. Any interconnection at these locations would have to be accommodated by installing additional cabinets and equipment.