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ORIGINAL

VIA HAND DELIVERY

June 12, 1998

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

Re: Docket No. 980671-TL

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Prepared Direct Testimonies of Sandra A. Khazraee and Thomas C. Foley.

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,


Charles J. Rehwinkel

Enclosures

cc: All parties of record

- ACK
- AFA
- APP
- CAF
- CMU *Sigiani*
- CTR
- EAG
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- LIN *5+orig*
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FPSC BUREAU OF RECORDS

Khazraee
DOCUMENT NUMBER - DATE
06254 JUN 12 98
FPSC-RECORDS/REPORTING

Foley
DOCUMENT NUMBER - DATE
06255 JUN 12 98
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 980671-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 12th day of June, 1998 to the following:

Will Cox
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A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", with a horizontal line underneath it.

Charles J. Rehwinkel
Attorney for
Sprint-Florida, Inc.
P.O. Box 2214 MC FLTLHO0107
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ORIGINAL

SPRINT - FLORIDA, INC.
DOCKET NO. 980671-TL
FILED: JUNE 12, 1998

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

SANDRA A. KHAZRAEE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Sandra A. Khazraee and I am employed as Sr. Manager-Regulatory Affairs with Sprint-Florida, Inc. My business address is Sprint - Florida, 1313 Blairstone Road, Tallahassee, Florida 32301.

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 21 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

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06254 JUN 12 98

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1 Switch Planner).

2

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

8

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

10

11 A. I am testifying on behalf of Sprint - Florida. The
12 purpose of my testimony is to provide and support the
13 Company's policy on NPA relief methods. In my testimony,
14 NPA refers to Numbering Plan Area or what is commonly
15 referred to as an area code. NXX refers to the first
16 three digits of a local telephone number; e.g., the NXX
17 for number 821-4000 is 821.

18

19 Q. WHAT METHODS ARE AVAILABLE FOR NPA RELIEF?

20

21 A. NPA code expansion, or relief planning, can be effected by
22 implementing an NPA split, an NPA realignment, or an NPA
23 overlay. The NPA split, which has been the alternative
24 chosen for most NPA relief situations to date, divides the
25 exhausting NPA into two geographic areas. The boundary of

1 an NPA split typically follows demographic,
2 jurisdictional, natural or physical boundaries such as
3 cities, rivers or highways. The boundaries are chosen to
4 minimize disruption of existing calling patterns as much
5 as possible. The existing NPA code is assigned to the
6 geographic area with the greatest number of working lines
7 in order to minimize the number of customers impacted by
8 the NPA change.

9
10 An NPA realignment is considered when the ^zNPA requiring
11 relief is adjacent to an NPA, within the same state or
12 geographic area, which has spare NXX code capacity. A
13 boundary shift occurs so that spare codes in the adjacent
14 NPA can be used in the NPA requiring relief. As a result,
15 the geographic area of the exhausting NPA shrinks, and the
16 geographic area of the NPA with spare capacity expands.

17
18 In an NPA overlay, code relief is provided by opening up
19 a new NPA within the same geographic area. Numbers for
20 the new NPA are assigned to new growth on a carrier
21 neutral basis; first come first served. Although
22 mandatory customer number changes are eliminated, ten
23 digit dialing is required for local calling.

24
25 The NPA overlay has been implemented to date in limited

1 areas. Ameritech, in the Chicago area, attempted to
2 institute an overlay, but due to their requirement for
3 wireless providers to relinquish existing numbers, the FCC
4 found the Ameritech plan "would unreasonably discriminate
5 against wireless carriers" and overruled it. In follow up
6 to this ruling, the FCC provided further clarification on
7 the use of NPA overlays in the Second Report and Order on
8 Interconnection (CC Docket No. 96-333) adopted August 8,
9 1996. Overall, the FCC declared technology specific (i.e.
10 wireless only) overlays are not allowed, as in the
11 Ameritech case. The FCC further directed that a state
12 commission may choose implementation of an NPA overlay
13 subject to two conditions: 1) mandatory 10 digit local
14 dialing by all customers between and within area codes in
15 the area covered by the new code; and 2) availability to
16 every existing telecommunication carrier, including CMRS
17 providers, authorized to provide telephone exchange
18 service in the affected area code 90 days before the
19 introduction of a new overlay code, of at least one NXX in
20 the existing area code.

21

22 Q. WHICH OF THESE METHODS DOES SPRINT ENDORSE?

23

24 A. Sprint supports the NPA split and the NPA overlay when the
25 FCC conditions are met. Sprint does not advocate the NPA

1 realignment method of relief in cases where the
2 surrounding NPAs are not underutilized.

3

4 Q. WHICH OF THE PLANS DISCUSSED IN THE 407 NPA SPLIT INDUSTRY
5 MEETINGS SHOULD BE CONSIDERED BY THE COMMISSION?

6

7 A. As indicated in the testimony of Sprint's technical
8 witness, Thomas Foley, there were three plans determined
9 to be the most viable of all the plans considered in the
10 industry meetings. These were plans one, four and seven,
11 all of which have advantages and disadvantages. Mr.
12 Foley's testimony discusses the particulars associated
13 with each of these plans.

14

15 Q. WHICH OF THESE PLANS COULD SPRINT SUPPORT?

16

17 A. Sprint could support all three of these plans and is fully
18 prepared to implement the plan that is the least
19 disruptive to our customers. Sprint still concurs with
20 the original Bellcore NPA relief guidelines which specify
21 that in the event of an NPA split, the geographic area
22 with the greatest density of telephone numbers in use
23 should maintain the existing NPA code.

24

25 Q. WHAT DOES SPRINT RECOMMEND AS THE PLAN FOR RELIEF TO THE

1 407 NPA?

2

3 A. Sprint - Florida supports the best interests of the
4 residents of central Florida and believes this will be
5 determined through the public hearings scheduled in
6 August. Although Sprint does not normally support an NPA
7 overlay, given the unique circumstances in central Florida
8 Sprint believes that the overlay is a viable alternative
9 in this case and perhaps provides the best short and long
10 term relief to the number exhausts in central Florida.
11 However, if the public hearings show that an NPA split
12 plan is in the best interest of the majority of the
13 telecommunications customers in central Florida, then
14 Sprint will support that plan.

15

16 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

17

18 A. Yes.

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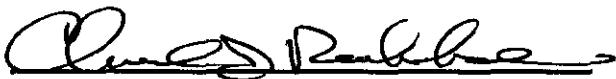
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