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March 11, 1996

FILE COPY

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: Petition by the residents of Polo Park
requesting extended area service (EAS)
between the Haines City exchange and the
Orlando, West Kissimmee, Lake Buena Vista,
Windermere, Reedy Creek, Winter Park, Clermont,
Winter Garden and St. Cloud exchanges
Docket No. 930173-TL

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United Telephone Company of Florida and Central Telephone Company of Florida's Direct Testimony of Sharon E. Harrell.

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. Jeffrey Wahlen

- ACK
- AAA
- APP
- CAS
- CTM
- ENG
- JJW
- ENC Enclosures
- LN 3 cc: All parties of record
- OPC utd\930173.by
- ECN
- SEC
- WAS
- OTH

mas

DOCUMENT NUMBER-DATE

02960 MAR 11 96

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 11th day of March, 1996, to the following:

Donna Canzano *
Division of Legal Services
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Tallahassee, FL 32399-0850

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BellSouth Telecommunications
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Lake Buena Vista, FL 32830



ATTORNEY

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2 DIRECT TESTIMONY

3 OF

4 SHARON E. HARRELL

5
6 Q. Please state your name, business address and title.

7
8 A. My name is Sharon E. Harrell. My business address is
9 Office Box 165000, Altamonte Springs, Florida,
10 32716-5000.

11
12 I am Tariff Manager - Exchange Services for United
13 Telephone Company of Florida ("Sprint-United") and
14 Central Telephone Company of Florida ("Sprint-Centel").
15 This docket only involves Sprint-United.

16
17 Q. Please describe your previous work experience.

18
19 A. I began my career in 1964 when I joined United Telephone
20 of Ohio as a long distance operator. In 1973, I
21 transferred to the position of Service Representative in
22 the Business Office. In 1977, I relocated to Florida and
23 began work as a long distance operator with United
24 Telephone of Florida. I transferred to the Business
25 Office in 1978 in the capacity of Service Representative.

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FPSC-RECORDS/REPORTING

1 In 1980, I was promoted to the position of Business
2 Office Supervisor. I moved to the Staff Administrator
3 Customer Service position in 1986. In that position I
4 was responsible for providing support and direction to
5 eight business offices and two collection offices for
6 United.

7

8 I began my present assignment in 1993.

9

10 Q. Have you previously testified before the Commission ?

11

12 A. Yes. I was the witness for Sprint-United and
13 Sprint-Centel in Docket No. 941281-TL, which dealt with
14 the proper tariffing of telephone service for elevators
15 and common areas within residential facilities.

16

17 Q. What is the purpose of your testimony?

18

19 A. The purpose of my testimony is to address the issues in
20 this docket. My testimony is based upon traffic studies
21 conducted by Sprint-United in this docket involving the
22 interLATA long distance routes between GTE's Haines City
23 Exchange and Sprint-United's Windermere, Reedy Creek,
24 Winter Park, Clermont, Winter Garden, St. Cloud,
25 Kissimmee and West Kissimmee Exchanges.

1 Q. What is Sprint-United's position in this docket?
2
3 A. Traffic study results on the routes in this docket
4 reflected that calling rates from the Sprint-United
5 exchanges to the Haines City Exchange were not sufficient
6 to meet the requirements for messages per access line per
7 month (M/A/Ms) or distribution to qualify for balloting
8 for flat rate, non-optional Extended Area Service (EAS)
9 on any of the routes. Rather, the calling patterns on
10 these routes do not support the implementation of any
11 form of toll relief.
12
13 Q. Please explain more fully the results of the traffic
14 studies conducted by Sprint-United.
15
16 A. The traffic studies were conducted on the following
17 routes:
18 • Kissimmee, West Kissimmee to Haines City (excluding
19 the Poinciana 427 pocket)
20 • Windermere, Reedy Creek, Clermont, Winter Garden,
21 Winter Park and St. Cloud to Haines City
22 • Windermere, Reedy Creek, Clermont, Winter Garden,
23 Winter Park and St. Cloud to Haines (including the
24 Poinciana 427 pocket).
25

1 The results of all the studies reflected insufficient
2 usage on both the calls per access line (M/A/Ms) and the
3 frequency distribution, or number of subscribers making
4 2 or more calls, to meet the existing FPSC Rules for
5 balloting.

6
7 Some additional observations based on customer usage data
8 on the routes studied in this docket are:

- 9 • Kissimmee and West Kissimmee to Haines City
10 (except 427 pocket):

11 On both routes 90% of the residential
12 customers made no calls

- 13 • Winter Park, Windermere, Winter Garden, Clermont,
14 St. Cloud and Reedy Creek to Haines City:

15 On the route with the highest calling volume,
16 92% of the residential customers made no calls

- 17 • Winter Park, Windermere, Winter Garden, Clermont,
18 St. Cloud and Reedy Creek to Haines City (427
19 pocket only):

20 On the route with the highest calling volume,
21 98% of the residential customer made no calls

22

23 Q. Is there sufficient community of interest on the routes
24 in this docket to justify surveying for non-optional flat
25 rate EAS?

1 A. No. The Florida Public Service Commission Rule
2 25-4.060(3), Florida Administrative Code, requires a
3 preliminary showing that there is a community of interest
4 sufficient to warrant further EAS proceedings. A
5 sufficient community of interest exists when the calling
6 rate exceeds 2 M/A/Ms and 50% of the subscribers make 2
7 or more calls per month.

8
9 Though the calling rates from the requesting exchange
10 remain unknown, the history on previously studied routes
11 can be used to provide estimates. I reviewed the two-way
12 calling on fourteen intraLATA routes that were studied by
13 Sprint-United. Calls placed in both directions reflected
14 a varying difference in call volume with 51% being the
15 most extreme difference of full exchange calling rates.
16 Even using the most extreme case of 51% more calls in one
17 direction than the other, based on the call volumes on
18 the routes in this docket, none would come close to
19 meeting the Commission requirements for balloting for
20 non-optional flat rate EAS. In fact, even if you
21 multiplied the calls on the routes in this docket by five
22 (5), the resulting M/A/Ms would still fall short of
23 existing Commission requirements for balloting. Based on
24 this information, the calling patterns on these routes do
25 not support the implementation of any form of toll relief.

1 Q. What other community of interest factors should be
2 considered in determining if either an optional or
3 non-optional InterLATA toll alternative should be
4 implemented?

5
6 A. In addition to considerations provided for in the
7 commission rules, there are some factors often mentioned
8 by subscribers desiring EAS. Such factors may include
9 the location of schools, fire/police departments, medical
10 emergency facilities, and county government.

11
12 The requesting exchange, Haines City, is located in Polk
13 County. None of the above community of interest factors
14 for the Sprint-United exchanges are located in Polk
15 County, and we are not aware of any additional community
16 of interest factors for the Haines City exchange that
17 would justify balloting for non-optional flat rate EAS.

18
19 Q. Should the commission determine that an alternative toll
20 plan such as ECS should be implemented, what is the
21 economic impact on the Company?

22
23 A. Based on the monthly calling volume reflected in the
24 traffic studies, the estimated annual revenue impact to
25 the Company would be a loss of \$218,000. These dollars

1 do not reflect the additional costs for facilities that
2 would be required to carry the traffic, or the costs for
3 switch translations, directories and directory assistance
4 allowance, or other administrative costs associated with
5 the implementation of the toll alternative.

6

7 Q. Does that conclude your direct testimony?

8

9 A. Yes.

10

11

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