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FILE COPY

February 21, 1997

**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: Docket No. 950699-TL

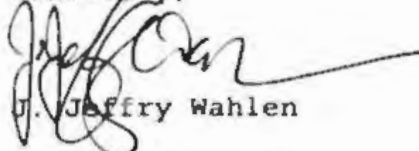
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Direct Testimony and Exhibit (redacted version) 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 \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU 1
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures  
cc: Parties of Record  
utd\699-byo

RECEIVED & FILED  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01985 FEB 21 5

FPSC-RECORDS/REPORTING

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            Post Office Box 165000, Altamonte Springs, Florida,  
10           32716-5000.

11  
12           I am the Tariff Manager - Exchange Services for  
13           Sprint-Florida, Incorporated ("Sprint").

14  
15       Q.    Please describe your previous work experience.

16  
17       A.    I began my career in 1964 when I joined United Telephone  
18            of Ohio as a long distance operator. In 1973, I  
19            transferred to the position of Service Representative in  
20            the Business Office. In 1977, I relocated to Florida and  
21            began work as a long distance operator with United  
22            Telephone of Florida. I transferred to the Business  
23            Office in 1978 in the capacity of Service Representative.  
24            In 1980, I was promoted to the position of Business  
25            Office Supervisor. I moved to the ~~Office~~ Administrator

01985 FEB 21 6

FPSC-RECORDS/REPORTING

1 Customer Service position in 1986. In that position I  
2 was responsible for providing support and direction to  
3 eight business offices and two collection offices for  
4 United.

5

6 I began my present assignment in 1993.

7

8 Q. Have you previously testified before the Commission?

9

10 A. Yes. I was the witness for Sprint-United and  
11 Sprint-Centel in Docket No. 941281-TL, which dealt with  
12 the proper tariffing of telephone service for elevators  
13 and common areas within residential facilities. I also  
14 testified in Docket No. 930173-TL, Polo Park EAS, and  
15 Docket No. 941281-TL, Groveland EAS involving United  
16 exchanges.

17

18 Q. What is the purpose of your testimony?

19

20 A. The purpose of my testimony is to address the issues  
21 identified in Docket No. 950699-TL. These issues include  
22 whether a sufficient community of interest exists between  
23 GTE's Haines City Exchange and all other exchanges within  
24 Polk County.

25

1 Q. Have you prepared an Exhibit to accompany this testimony?

2

3 A. Yes. Exhibit One to this testimony is a traffic study  
4 for the Sprint routes involved in this proceeding. It  
5 was prepared under my direction and supervision and is  
6 true and correct to the best of my knowledge. It  
7 contains information Sprint believes to be proprietary  
8 confidential business information, so a redacted version  
9 has been included with this testimony. The confidential  
10 version, with the confidential information highlighted,  
11 was submitted to the Division of Records and Reporting  
12 under a confidential cover with a Request for  
13 Confidential Classification.

14

15 Q. Which routes in this Docket involve Sprint exchanges?

16

17 A. Haines City to Fort Meade is the only route involving a  
18 Sprint exchange. Fort Meade is a Sprint exchange.

19

20 Q. Did Sprint conduct traffic studies on this route?

21

22 A. Yes. Sprint recently conducted a traffic study on this  
23 route, and it is attached as Exhibit One. In Order No.  
24 PSC-95-1429-PCO-TL, issued November 27, 1995, the  
25 Commission recognized the Fort Meade, Avon Park (pocket)

1 and Bowling Green exchanges as being interLATA. The  
2 Order stated that the routes would not be studied since  
3 GTEFL could not provide traffic studies on interLATA  
4 routes. Based on that Order, no traffic studies were  
5 prepared at that time.

6

7 Q. What is Sprint's position in this Docket?

8

9 A. Traffic study results on the Ft. Meade to Haines City  
10 route reflect calling rates that are not sufficient to  
11 meet the requirements for messages per access line per  
12 month (M/A/Ms), or frequency distribution to qualify for  
13 balloting for flat rate, non-optional Extended Area  
14 Service (EAS) or the implementation of any form of toll  
15 relief.

16

17 Q. What other community of interest factors should be  
18 considered in determining if either an optional or  
19 non-optional interLATA toll alternative should be  
20 implemented?

21

22 A. In addition to traffic studies, there are some factors  
23 often mentioned by subscribers desiring EAS. Such  
24 factors may include the location of schools, fire/police  
25 departments, medical emergency facilities, and county

1 government.

2

3 The Fort Meade Exchange currently has EAS to Lakeland,  
4 which is the County Seat, and Bartow, where the State and  
5 Federal Offices serving this area are located.

6

7 Schools are located within the Fort Meade Exchange, and  
8 medical requirements that can not be handled by the Fort  
9 Meade Medical Center are most often handled via medical  
10 facilities in Lakeland, which as mentioned above is EAS.

11

12 Q. Should the Commission determine that an alternative toll  
13 plan such as ECS should be implemented, what is the  
14 economic impact on the Company?

15

16 A. Based on the monthly calling volume reflected in the  
17 traffic study, the estimated annual revenue impact to the  
18 Company would be a loss of approximately \$5,460 if there  
19 is no stimulation on the route. A 50% stimulation, which  
20 is consistent with the factor used by Southern Bell in  
21 Docket No. 920260-TL, would result in a revenue loss of  
22 approximately \$3,855. These dollars do not reflect the  
23 additional costs for facilities that would be required to  
24 carry the traffic, or other administrative costs  
25 associated with the implementation of the toll

1 alternative.

2

3 Q. If the Commission should determine that EAS is  
4 appropriate, should subscribers be required to pay an  
5 additive as a prerequisite to implementation? If so, how  
6 much of a payment is required and how long should it  
7 last?

8

9 A. Should the Commission determine that EAS is appropriate  
10 on the Fort Meade/Haines City route, the 25/25 Plan with  
11 Regrouping should be ordered.

12

13 Q. If EAS is determined to be appropriate, should customers  
14 be surveyed?

15

16 A. Yes. If a non-optional plan is determined to be  
17 appropriate, the subscribers should be surveyed. All  
18 subscribers should have a voice in the implementation of  
19 such a plan since all subscribers will pay for the plan  
20 if implemented.

21

22 Q. Does that conclude your direct testimony?

23

24 A. Yes.

25 ucd\harrellj.cac

SCHEDULE I  
 DOCKET NO. 950699-TL  
 INTEREXCHANGE TRAFFIC STUDY  
 FORT MEADE EXCHANGE TO  
 HAINES CITY EXCHANGE  
 ONE-WAY

\*\*\*\*\*UNITED PORTION ONLY\*\*\*\*\*

| (A) | (B)             | (C)             | (D)                               | (E)                        | (F)   | (G)                   |
|-----|-----------------|-----------------|-----------------------------------|----------------------------|---|-----------------------|
|     | <u>AL&amp;T</u> | <u>MESSAGES</u> | <u>CALLING<br/>RATE<br/>M/A/M</u> | <u>TOTAL<br/>CUSTOMERS</u> | <u>CUSTOMERS<br/>MAKING 2 OR MORE<br/>CALLS/MONTH</u> | <u>NUMBER PERCENT</u> |

PART I  
 ROUTES OVER 3 M/A/M  
 FROM: \_\_\_\_\_ TO: \_\_\_\_\_  
 1. FORT MEADE HAINES CITY

PART II  
 ROUTES 1.99 TO 1.00 M/A/M  
 FROM: \_\_\_\_\_ TO: \_\_\_\_\_

PART III  
 ROUTES 1.99 TO 1.00 M/A/M  
 FROM: \_\_\_\_\_ TO: \_\_\_\_\_

PART IV  
 ROUTES BELOW .99 M/A/M  
 FROM: \_\_\_\_\_ TO: \_\_\_\_\_

NOTE: DATA EXCLUDES PUBLIC COIN LINES  
 AND ASSOCIATED MESSAGES

Exhibit One

DOCUMENT NUMBER-DATE  
 01985 FEB 21 5  
 FPSC-RECORDS/REPORTING



SCHEDULE II  
 DOCKET NO. 950699-TL  
 INTEREXCHANGE TRAFFIC STUDY  
 FORT MEADE EXCHANGE TO  
 HAINES CITY EXCHANGE

\*\*\*\*\*UNITED PORTION ONLY\*\*\*\*\*

| (A) | (B)  | (C)      | (D)                    | (E)                | (F)  | (G) |
|-----|------|----------|------------------------|--------------------|--|-----|
|     | AL&T | MESSAGES | CALLING<br>RATE<br>M/M | TOTAL<br>CUSTOMERS | CUSTOMERS<br>MAKING 1 OR MORE<br>CALLS/MONTH<br>NUMBER PERCENT |     |

PART I  
 ROUTES OVER 2 M/M  
 FROM: \_\_\_\_\_ TO \_\_\_\_\_  
 1. FORT MEADE HAINES CITY

PART II  
 ROUTES 1.99 TO 1.00 M/M  
 FROM: \_\_\_\_\_ TO \_\_\_\_\_

PART III  
 ROUTES BELOW .99 M/M  
 FROM: \_\_\_\_\_ TO \_\_\_\_\_

NOTE: DATA EXCLUDES PUBLIC COIN LINES  
 AND ASSOCIATED MESSAGES

DATE: 01/30/97  
TIME: 17:02

UNITED TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT STUDY  
10/01/96 TO 10/31/96  
FROM: FTND TO: MACT

IXC TOLL

EA180A0A/014

PAGE  
1

TOTAL RECORDS IN  
TOTAL CUSTOMERS IN  
TOTAL MESSAGES IN  
TOTAL MINUTES IN  
TOTAL REVENUE IN

TOTAL RECORDS OUT  
CUSTOMERS - NO TOLLS  
TOTAL MESSAGE OUT  
TOTAL MINUTES OUT  
TOTAL REVENUE OUT

THIS REPORT INCLUDES TOLL TYPES: TOLL

01N MESSAGES EXCLUDED

TIME 17:04  
ESTDENCE

FROM: FORHEADE  
TO : MAINCITY

UNITED TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT STUDY  
10/01/96 TO 10/31/96

LA18540A/017

PAGE  
1

IXC TOLL

| A        | B                          | C                      | D               | E                               | F                     | G               | H                                | I                     | J               | K                  | L                |
|----------|----------------------------|------------------------|-----------------|---------------------------------|-----------------------|-----------------|----------------------------------|-----------------------|-----------------|--------------------|------------------|
| MESSAGES | ==== DAY (8-5)<br>MESSAGES | NO DISCOUNT<br>REVENUE | ====<br>MINUTES | ==== EVENING (5-11)<br>MESSAGES | DISCOUNTED<br>REVENUE | ====<br>MINUTES | ==== NIGHT + WEEKEND<br>MESSAGES | DISCOUNTED<br>REVENUE | ====<br>MINUTES | TOTAL<br>CUSTOMERS | TOTAL<br>REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 0.
- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 0.

Sprint Florida, Inc.  
 DocId: No. 930699-TL  
 Sharon E. Harrell  
 Ebbell One  
 Page 4 of 10

S REPORT INCLUDES TOLL TYPES: TOLL

N MESSAGES EXCLUDED

DATE: 01/30/97  
TIME: 17:04  
RESIDENCE

FROM: FORTMEADE  
TO: HAIRSCITY

UNITED TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT STUDY  
10/01/96 TO 10/31/96

E4185A0A/017  
LXC ROLL

PAGE  
2

| A        | B                       | C                   | D             | E                         | F                  | G             | H                          | I                  | J             | K               | L             |
|----------|-------------------------|---------------------|---------------|---------------------------|--------------------|---------------|----------------------------|--------------------|---------------|-----------------|---------------|
| MESSAGES | **** DAY (0-5) MESSAGES | NO DISCOUNT REVENUE | ***** MINUTES | **EVENING (5-11) MESSAGES | DISCOUNTED REVENUE | ***** MINUTES | **NIGHT + WEEKEND MESSAGES | DISCOUNTED REVENUE | ***** MINUTES | TOTAL CUSTOMERS | TOTAL REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.

Sprint-Florida, Inc.  
DocId No. 990699-TL  
Sharon E. Harrell  
Estate Case  
Page 5 of 10

THIS REPORT INCLUDES TOLL TYPES: TOLL

COIN MESSAGES EXCLUDED

JUNE 17 104  
BUSINESS

FROM: FORTMEADE  
TO: MAINECITY

WESTERN TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT STUDY  
10/01/96 TO 10/31/96

LA109AUA'017

PAGE 3

EXC TOLL

| A        | B                       | C                   | D       | E                         | F                  | G       | H                          | I                  | J       | K               | L             |
|----------|-------------------------|---------------------|---------|---------------------------|--------------------|---------|----------------------------|--------------------|---------|-----------------|---------------|
| MESSAGES | **** DAY (8-9) MESSAGES | NO DISCOUNT REVENUE | MINUTES | **EVENING (7-11) MESSAGES | DISCOUNTED REVENUE | MINUTES | **NIGHT + WEEKEND MESSAGES | DISCOUNTED REVENUE | MINUTES | TOTAL CUSTOMERS | TOTAL REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.
- 16.
- 17.
- 18.
- 19.
- 20.

System Florida, Inc.  
 DocId No. 930699-TL  
 Sharon E. Harrell  
 ELSA@fla.com  
 Page 6 of 10

IS REPORT INCLUDES TOLL TYPES: TOLL

IN MESSAGES EXCLUDED

DATE: 01/30/97  
TIME: 17:04

UNITED TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT STUDY  
10/01/96 TO 10/31/96

EA185A04/017

PAGE  
4

BUSINESS FROM: FORTMEADE  
TO: PALM BEACH CITY

INT TOLL

| A        | B                           | C                 | D                   | E                            | F                       | G       | H                     | I                  | J                       | K                 | L                |
|----------|-----------------------------|-------------------|---------------------|------------------------------|-------------------------|---------|-----------------------|--------------------|-------------------------|-------------------|------------------|
| MESSAGES | ==== DAY (18-5)<br>MESSAGES | MO D'S<br>REVENUE | JUMT====<br>MINUTES | ==EVENING (5-11)<br>MESSAGES | DISCOUNTED==<br>REVENUE | MINUTES | ==NIGHT +<br>MESSAGES | WEEKEND<br>REVENUE | DISCOUNTED==<br>MINUTES | TOTAL<br>CUSTOMER | TOTAL<br>REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.

Spire-Florida, Inc.  
DocId: No. 990699-TL  
Sharon B. Harrell  
E-Book One  
Page 7 of 10

THIS REPORT INCLUDES TOLL TYPES: TOLL

COIN MESSAGES EXCLUDED

COMBINED FROM: FORTMEADE  
TO : HAINES CITY

EXC TOLL

| A        | B        | C       | D       | E        | F       | G       | H        | I       | J       | K               | L             |
|----------|----------|---------|---------|----------|---------|---------|----------|---------|---------|-----------------|---------------|
| MESSAGES | MESSAGES | REVENUE | MINUTES | MESSAGES | REVENUE | MINUTES | MESSAGES | REVENUE | MINUTES | TOTAL CUSTOMERS | TOTAL REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.
- 16.
- 17.
- 18.
- 19.
- 20.
- 21.
- 22.
- 23.
- 24.
- 25.
- 26.
- 27.
- 28.

Sprint-Florida, Inc.  
 Docket No. 930699-TL  
 Sharon B. Hamill  
 Dallas, Tex  
 Page 8 of 10

THIS REPORT INCLUDES TOLL TYPES: TOLL

218 MESSAGES EXCLUDED

DATE: 01/30/97  
TIME: 17:04

UNITED TELEPHONE COMPANY OF FLORIDA  
POINT-TO-POINT SILENT  
10-01/96 TO 10/31/96

EA105A0A/017

PAGE  
6

FROM: FORTMEADE  
TO : HAINES CITY

IXC TOLL

COMBINED

| A        | B  | C       | D       | E   | F       | G       | H  | I       | J       | K                  | L                |
|----------|--|---------|---------|---|---------|---------|--|---------|---------|--------------------|------------------|
| MESSAGES | **** DAY (8-5) NO DISCOUNT****<br>MESSAGES | REVENUE | MINUTES | **EVENING (5-11) DISCOUNTED**<br>MESSAGES | REVENUE | MINUTES | **NIGHT * WEEKEND DISCOUNTED**<br>MESSAGES | REVENUE | MINUTES | TOTAL<br>CUSTOMERS | TOTAL<br>REVENUE |

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.

Sprint Florida, Inc.  
DocId: No. 950699-TL  
Sharon E. Harrell  
Eshelb Dwe  
Page 9 of 10

THIS REPORT INCLUDES TOLL TYPES: TOLL

COIN MESSAGES EXCLUDED



SUMMARY

FROM: FORNWADE  
TO : MAINECITY

EXC TOLL

|   | A         | B        | C     |
|---|-----------|----------|-------|
|   | RESIDENCE | BUSINESS | TOTAL |
| 1. ACCESS LINES   |           |          |       |
| 2. CUSTOMERS BILLED                                     |           |          |       |
| 3. NUMBER OF CUSTOMERS ORIGINATING 1 OR MORE MESSAGES   |           |          |       |
| 4. ORIGINATING MESSAGES                                 |           |          |       |
| 5. MESSAGE MINUTES                                      |           |          |       |
| 6. MESSAGE REVENUE                                      |           |          |       |
| 7. CUSTOMER USAGE 1 OR MORE MESSAGES (L3/L2)            |           |          |       |
| 8. AVERAGE MESSAGES PER ACCESS LINE (L6/L1)             |           |          |       |
| 9. AVERAGE MESSAGES PER CALLING CUSTOMER (L6/L3)        |           |          |       |
| 0. AVERAGE MINUTES PER MESSAGE (L5/L6)                  |           |          |       |
| 1. AVERAGE REVENUE PER MESSAGE (L6/L4)                  |           |          |       |
| 2. AVERAGE MESSAGE REVENUE PER ACCESS LINE (L6/L1)      |           |          |       |
| 3. AVERAGE MESSAGE REVENUE PER CALLING CUSTOMER (L6/L3) |           |          |       |
| 4. NUMBER OF CUSTOMERS ORIGINATING 2 OR MORE MESSAGES   |           |          |       |
| 5. CUSTOMER USAGE 2 OR MORE MESSAGES (L14/L2)           |           |          |       |

THIS REPORT INCLUDES TOLL TYPES: TOLL

188 MESSAGES EXCLUDED

CERTIFICATE OF SERVICE

950649-72

S. MARION HARPER

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 21st day of February, 1997, to the following:

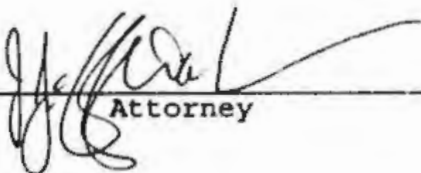
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Haines City, FL 33845-0277

  
\_\_\_\_\_  
Attorney

utd\699-com

DNO1985-97  
2/21/97