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10

November 1, 1996

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 for numbering plan area relief for 904
area code, by BellSouth Telecommunications, Inc.;
Docket No. 961153-TL

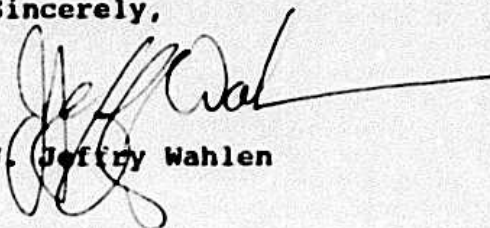
Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint/United and Sprint/Centel's Direct Testimony of Sandra A. Khazraee in the above-referenced 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. Jeffrey Wahlen

2 JJW/bjm

Enclosures

3 cc: All Parties of Record (w/encls.)

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BEFORE THE PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

SANDRA A. KHAZRAEE

1
2
3
4
5 Q. Please state your name and business address.

6
7 A. My name is Sandra A. Khazraee. My business address is
8 Sprint/United Telephone of Florida, 555 Lake Border Drive,
9 Apopka, Florida 32753.

10
11 Q. Please describe your educational background work
12 experiences.

13
14 A. I received a Bachelor of Science Degree in Mathematics from
15 McNeese State University, Lake Charles, LA. Over the past
16 19 years, I have attended numerous industry schools and
17 seminars covering a variety of technical, economic and
18 regulatory issues.

19
20 I was an Outside Plant Engineer with South Central Bell
21 from May 1977 to August 1981. In 1981, I transferred to
22 Pacific Bell where I worked as an Outside Plant Engineer,
23 Planning Engineer and Wire Center Planner (Long Range
24 Switch Planner).

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

7 Q. What is the purpose of your testimony in this proceeding?
8

9 A. I am testifying on behalf of United Telephone Company of
10 Florida ("Sprint/United") and Central Telephone Company of
11 Florida ("Sprint/Centel") or the "Companies". The purpose
12 of my testimony is to provide and support the Companies
13 position on the 904 NPA split. In my testimony, NPA refers
14 to Numbering Plan Area or what is commonly referred to as
15 an area code. NXX refers to the first three digits of a
16 local telephone number, e.g., the NXX for number 821-4000
17 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, jurisdictional,
2 natural or physical boundaries such as cities, rivers or
3 highways. The boundaries are chosen to minimize disruption
4 of existing calling patterns as much as possible. The
5 existing NPA code is assigned to the geographic area with
6 the greatest number of working lines in order to minimize
7 the number of customers impacted by the NPA change.

8
9 An NPA realignment is considered when the NPA requiring
10 relief is adjacent to an NPA, within the same state or
11 geographic area, which has spare NXX code capacity. A
12 boundary shift occurs so that spare codes in the adjacent
13 NPA can be used in the NPA requiring relief. As a result,
14 the geographic area of the exhausting NPA shrinks, the
15 geographic area of the NPA with spare capacity expands.

16
17 In an NPA overlay, code relief is provided by opening up a
18 new NPA within the same geographic area. Numbers for the
19 new NPA are assigned to new growth on a carrier neutral
20 basis; first come first served. Although mandatory
21 customer number changes are eliminated, ten digit dialing
22 is required for local calling.

23
24 The NPA overlay has been implemented to date only in New
25 York City, where it was limited to wireless providers' use.

1 Ameritech, in the Chicago area, attempted to institute an
2 overlay, but due to their requirement for wireless
3 providers to relinquish existing numbers, the FCC found the
4 Ameritech plan "would unreasonably discriminate against
5 wireless carriers" and overruled it. In follow up to this
6 ruling, the FCC provided further clarification on the use
7 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 ten 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 service
18 in the affected area code 90 days before the introduction
19 of a new overlay code, of at least one NXX in the existing
20 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's first choice is the NPA

1 split. The NPA split does not require ten digit dialing
2 for all calls as the NPA overlay does. Additionally,
3 technical aspects associated with an NPA split have been
4 addressed in previous NPA relief implementations within the
5 state and established implementation procedures are
6 generally understood. Customers are more educated about
7 the NPA split process and would likely experience less
8 confusion than with the NPA overlay.

9
10 Q. Which of the plans discussed in the 904 NPA split industry
11 meetings should be considered by the Commission?

12
13 A. There were three plans which were determined to be the most
14 viable of all the plans considered in the industry
15 meetings.

16
17 Plan 1 proposes the assignment of the 850 NPA to the
18 Pensacola, Panama City and Tallahassee LATAs. The 904 NPA
19 would remain assigned to the Jacksonville and Daytona Beach
20 LATAs. Based on the NXX forecasts filed by the code
21 holders with BellSouth, this plan would extend the life of
22 the 904 NPA through approximately September of 2002 and
23 would not exhaust the 850 NPA until approximately November
24 of 2006. Plan 1 most closely follows Bellcore's guidelines
25 for NPA relief that is the existing NPA code is left with

1 the geographic area that has the largest number of working
2 telephone numbers. Additionally, Plan 1 is estimated to
3 provide relief for a reasonable number of years for both
4 the 904 and 850 NPAs.

5
6 Plan 1a assigns the 850 NPA to the Jacksonville and Daytona
7 Beach LATAs and leaves the 904 NPA assigned to the
8 Pensacola, Panama City and Tallahassee LATAs. The
9 projected exhaust of the 850 NPA in this plan is September
10 2002 while the projected exhaust of the 904 NPA is November
11 2006. Plan 1a provides relief for the same number of years
12 as Plan 1. The major disadvantage of this plan over Plan
13 1 is that the Jacksonville and Daytona Beach LATAs will
14 require NPA relief four years after they were changed from
15 the 904 to the 850 NPA. Therefore, many of the customers
16 in those two LATAs will be subject to two number changes in
17 a four year period.

18
19 In Plan 2, the 850 NPA would be assigned to the Pensacola
20 and Panama City LATAs. The 904 NPA would be assigned to
21 the Tallahassee, Jacksonville and Daytona Beach LATAs. In
22 this plan, the 850 NPA would exhaust in May 2012 and the
23 904 NPA would exhaust in October 2000. This plan would
24 eliminate the short term need for the Tallahassee area to
25 change the NPA but this would only result in deferring the

1 needed relief in the 904 NPA for two years.

2

3 Q. Which of these plans could Sprint support?

4

5 A. Sprint could support all three of these plans although Plan
6 1 is preferable. As stated earlier, Bellcore's NPA relief
7 guidelines specify that the geographic area with the
8 greatest density of telephone numbers in use should
9 maintain the existing NPA code; Plan 1a does not meet that
10 criteria. Also, the customers within the new 850 NPA
11 (Jacksonville and Daytona Beach) would require a second NPA
12 split within four years in Plan 1a.

13

14 Plan 2 has the advantage of changing the fewest number of
15 customers' telephone numbers but it also provides the
16 shortest amount of relief. Within two years, the 904 NPA
17 would again require a relief plan. In Plan 1, the 904 NPA
18 would not require relief again until September 2002.
19 Therefore, Plan 1 is the most viable of the three plans.

20

21 Q. Does Sprint believe that the implementation of local number
22 portability will eliminate the 904 NPA exhaust problem
23 within the next four to five years?

24

25 A. No, Sprint does not believe that the implementation of

- 1 permanent local number portability (LNP) will eliminate the
2 need to implement new NPAs.
3
- 4 Q. What effect will interim number portability have on the NPA
5 exhaust?
6
- 7 A. Interim Number portability will increase the problem of NXX
8 and NPA exhausts. If a customer changes their service to
9 another telecommunications company but elects to keep their
10 existing telephone number, a second telephone number is
11 assigned to that customer. A significant number of these
12 customers could hasten the exhaust of the NPAs. Sprint
13 does not know if the code holders who provided input to the
14 forecast of NPA exhaust accounted for this demand.
15
- 16 Q. What should be done to minimize the negative impact of the
17 904 NPA split to all customers.
18
- 19 A. All involved telecommunications companies and the
20 Commission need to work together to mitigate the negative
21 impact to all customers affected by this NPA split. The
22 involved parties should refer to the plan followed in the
23 305/954 NPA split which occurred in Dade and Broward
24 counties. Minimal customer complaints were received during
25 that transition from one NPA to another because of the

1 proactive steps taken by the Commission and BellSouth.

2

3 Finally, the LECs should work with the State of Florida to
4 ensure a smooth transition to the new NPA. With seven
5 dedicated NXX codes and approximately 40K centrex lines
6 working in the Tallahassee area, the State has a
7 significant stake in this NPA split. Each LEC should work
8 with the State to assure that the "Blue" government pages
9 are updated in all directories. The LECs should also work
10 with the State to help identify issues early in the
11 planning process and assure all details are addressed.

12

13 Q. Does that conclude your direct testimony?

14

15 A. Yes.