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May 11, 1999

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

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RECORDS AND REPORTING

Re: Docket No. 990223-TL Supplemental Posthearing Statement of
Sprint-Florida, Incorporated

Enclosed for filing is the original and (7) copies of Sprint-Florida,
Incorporated's Supplemental Posthearing Statement.

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

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into telephone exchange boundary issues in South Polk County.

DOCKET NO. 981941-TL

In Re: Investigation into telephone exchange boundary issues in South Sarasota and North Charlotte Counties.

DOCKET NO. 990184-TL

In Re: Request for review of proposed numbering plan relief for the 941 area code.

DOCKET NO. 990223-TL

FILED: May 11, 1999

SUPPLEMENTAL POSTHEARING STATEMENT OF SPRINT-FLORIDA, INCORPORATED

Sprint-Florida, Incorporated (Sprint or Company) hereby files supplemental posthearing statement in this matter. Sprint's filing is made reluctantly and only as a last resort to avoid the delay inherent in reconsideration. Our filing is limited to two implementation issues. The first is a concern about the meaning of "county" with respect to the definition of any NPA boundary. The second is the proposed beginning of the permissive dialing date of July 5, 1999. Sprint offers these remarks (which, although not sworn testimony are representations of counsel and/or based on record citations) based on the fact that the proposed Alternative #7 was not discussed in any level of detail during the testimony filing stage or the hearing, nor was it explicitly discussed during the hearing. No party advocated Alternative #7 in post hearing filings. Furthermore, Sprint requested permission from the Commission to be able to address

unanticipated technical implementation issues upon revelation of new Alternatives. Sprint received some level of assurance that the appropriate procedural vehicle should be made available.¹ This filing is an effort to secure such a vehicle. Also, in its Posthearing Statement, Sprint stated:

To some degree we must reserve our right to review any proposal that has not been fully explicated on the record. When the staff makes its recommendation Sprint may ask to address any new issue or "evidence" at the agenda conference or through supplemental submittal.

(Sprint Brief at 8). Although Sprint recognizes that such post-recommendation filings are ordinarily frowned upon, the unusually accelerated track of this docket, coupled with the short time frames for implementation support the Commission accepting and considering these comments. Sprint does not request an opportunity to speak at the Agenda conference, but will be available to answer any questions. Under no circumstances does this supplemental Posthearing Statement address or give any opinion on the merits of the staff's recommended Alternative.

A. County boundary issue.

In proposing Alternative #7, the Commission has defined the new NPA in terms of County boundaries. This may be perceived to overlook the fact that service is provided on exchange basis that sometimes approximates, but does not exactly follow county boundaries. Until now the only split Alternative that was seriously discussed in a concrete sense was Alternative #3. In that case, the Commission heard testimony about the Ft. Meade and Englewood situations. The Commission staff expressly made slight adjustments in the presentation at hearing of Alternative #3 and now in the post hearing presentation

¹ In response to a concern raised about late-receipt of proposals or alternatives, Commissioner Johnson acknowledged that the time frame was short and stated:

I appreciate that. If we do get into that situation, we've considered something based on customer testimony that you haven't had an opportunity to adequately raise, make sure I'm aware of that and we'll make sure to provide you with that forum.

(Tr. 50-51). Commissioner Johnson had previously indicated that the intent was to find such a forum prior to the Commission making the decision. (Tr. 51).

of proposed Alternative #7. However, in the Alternative #7, the lack of precision in defining the boundaries of the proposed NPAs with respect to boundary situations not previously discussed could result in misunderstanding in the future. There are four "overhang" areas, where exchanges slightly protrude into certain Counties. These instances are the Arcadia exchange into Highlands County; Punta Gorda Exchange into Glades County; Avon Park into Hardee County and Bowling Green into Polk County. These four overhangs contain approximately 1100 customers in the aggregate and each represents a small minority of the total exchange customer count.

If the issue is not clarified, the literal wording of the proposal, contrasted with the explicit recognition of other "overhangs," elsewhere in the recommendation (Boca Grande and North Ft. Myers) could lead to the interpretation that the customers in the other four examples must take a number change. Sprint does not believe this is the intent of the staff or the will of the Commission. The NPA descriptions should be clarified such that the identified examples are included with the counties where the majority of the exchange subscribers reside. Thus, the entire Arcadia, Punta Gorda and Bowling Green exchanges should be included with whatever NPA DeSoto, Charlotte and Hardee Counties, respectively, are associated with while the entire Avon Park exchange should be included with the Highlands County NPA.

B. The July 5, 1999 permissive dialing start date.

Sprint is compelled to bring to the Commission's attention that the early permissive dialing start date is impossible to comply with. As noted by Sprint witness Foley and GTEFL witness Scobie, no dialing with the new (as yet unassigned code) can begin until all users of the Local Exchange Routing guide (LERG) have been notified in two consecutive editions of the new code.² (Foley, Tr. 199; Scobie, Tr. 259-260). To meet the most expedited two-LERG publication requirement as expeditiously as possible, a new NPA code must be assigned and available no later than May 20th. This will allow code holders to get all LERG input data completed by the May 28th cut off deadline for inclusion in the June LERG. This would really

²Sprint also has a subsidiary concern that July 5 is a holiday. Ordinarily a holiday weekend is desirable for an NPA conversion. However, scheduling the required overtime at this late juncture may be difficult since only certain experienced personnel can be utilized.

be pushing all code holders to get the new code information entered into the LERG, but it could be done. If these deadlines are met, permissive dialing could begin, at the earliest, in mid-September after publication of the hard-bound copy³ of the second LERG appearance of the new NPA code. If the May deadline is not met, the earliest permissive dialing can begin would be late in 1999.

For this reason, Sprint urges the Commission to establish a start date on a Monday in September (18th or 25th). This should be done even if it means a slight reduction in the permissive dialing period. Sprint does not advocate a significant change in the start of mandatory dialing.

In conclusion, Sprint regrets having to submit this unconventional filing, but believes that it is warranted under the unique circumstances of the case. All parties will be served this filing and facsimile service will be attempted as well.

Respectfully submitted this 11th day of May, 1999.



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³The LERG is issued monthly on a CD-ROM, but only quarterly in paper copy which is the only version to which users subscribe on a widespread basis.

CERTIFICATE OF SERVICE
DOCKET NO. 981941-TL, 990184-TL & 990223-TL

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