

ORIGINAL



RECEIVED-FPSC

00 APR 21 PM 4: 33

RECORDS AND REPORTING

Charles J. Rehwinkel
Senior Attorney

Law/External Affairs
Post Office Box 2214
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 847 0244
Fax 850 878 0777
charles.j.rehwinkel@mail.sprint.com

April 21, 2000

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. 990517-TL

Dear Ms. Bayo:

On behalf of Sprint-Florida, Inc., enclosed for filing are the original and fifteen (15) copies of the Direct Testimony of Sandra A. Khazraee in the above referenced dockets.

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 /cs

Charles J. Rehwinkel

cc: Parties of Record

Enclosures

- AFA _____
- APP _____
- CAF _____
- CMU *1*
- CTR _____
- EAG _____
- LEG *1*
- MAS *3 tags*
- OPC _____
- RRR _____
- SEC *1*
- WAW _____
- OYH _____

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04980 APR 21 8

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 990517-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 21st day of April, 2000 to the following:

Richard H. Brashear
ALLTEL Florida, Inc.
206 White Avenue S.E.
Live Oak, Florida 32060-3357

Donna C. McNulty
MCI WorldCom
325 John Knox Road Suite 105
Tallahassee, Florida 32303-4131

Nancy B. White
C/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street Suite 400
Tallahassee, Florida 32301-1556

Floyd Self
Messer Law Firm
Post Office Box 1876
Tallahassee, Florida 32302

Gwen Azama-Edwards
City of Daytona Beach
Post Office Box 2451
Daytona Beach, Florida 32115

Robert M. Weiss
Volusia County
123 West Indiana Avenue
Room #205
DeLand, Florida 32720

Comm. Wayne Gardner
City of Deltona
Post Office Box 5550
Deltona, Florida 32728-5550

William Cox
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Michael A. Gross
FCTA, Inc.
310 North Monroe Street
Tallahassee, Florida 32301

Northeast Florida Telephone
Company, Inc.
Ms. Deborah (Debi) L. Nobles
Post Office Box 485
Macclenny, FL 32063-0485

Angela Green, General Counsel
Florida Public Telecommunications
Association, Inc.
125 S. Gadsden Street, #200
Tallahassee, Florida 32301-1525

Bruce May
Holland Law Firm
Post Office Drawer 810
Tallahassee, Florida 32302


Charles J. Rehwinkel

ORIGINAL

Sprint-Florida, Inc.
Docket No. 990517-TL
April 21, 2000

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2
3 DIRECT TESTIMONY

4
5 OF

6
7 SANDRA A. KHAZRAEE

8
9 Q. Please state your name and business address.

10
11 A. My name is Sandra A. Khazraee. My business address is Sprint,
12 1313 Blair Stone Road, Tallahassee, Florida 32301.

13
14 Q. By whom are you employed, and what are your current
15 responsibilities.

16
17 A. I am employed by Sprint United Management Corporation as
18 Regulatory Manager. My current responsibilities include
19 coordinating responses to FPSC data requests and interrogatories
20 and ensuring compliance with FPSC orders. I interface regularly
21 with Sprint employees at all levels within the company to carry out
22 my job responsibilities.

23
24 Q. What is the purpose of your testimony?

25
DOCUMENT NUMBER-DATE
04980 APR 21 8
FPSC-RECORDS/REPORTING

1 A. The purpose of my testimony is to address how specific
2 alternatives for relief to the 904 NPA will impact Sprint and
3 Sprint's customers.

4
5 Q. What is Sprint's position regarding the best long-term relief
6 option for the 904 NPA?

7
8 A. For the reasons discussed in the minutes of the June 30, 1999,
9 904 NPA Relief Planning Industry Meeting, Sprint's position is that
10 the distributed overlay is the best long-term plan for relief of
11 the 904 NPA.

12
13 Q. If the Commission only considers geographic split alternatives,
14 among the NPA split alternatives discussed for the 904 NPA, which
15 alternatives does Sprint have concerns with and why?

16
17 A. Alternatives 4, 6 and 16B cause Sprint concerns because they
18 recommend an NPA split between Bradford and Clay counties. Sprint
19 has four exchanges in the 904 NPA and three of those four are in
20 Bradford and Clay counties. The Lawtey exchange is located in
21 Bradford County and the Kingsley Lake exchange is located in Clay
22 County. The Starke exchange is located predominantly in Bradford
23 County but a small portion of the exchange is in Clay County. If
24 Alternative 4, 6 or 16B are ordered by the Commission as a relief
25 plan, then the NPA boundary would be the Bradford/Clay county line;

1 thus the Kingsley Lake exchange and a portion of the Starke
2 exchange would be in one NPA while Lawtey and the majority of
3 Starke exchanges would be in a different NPA.

4
5 Q. How would a split along the Bradford/Clay county line affect
6 Sprint's customers in the Kingsley Lake, Starke and Lawtey
7 exchanges?

8
9 A. Kingsley Lake currently has seven-digit local dialing to the
10 nearby communities of Starke, Lawtey and Raiford. If Alternative 4,
11 6 or 16B were implemented, then those customers in Kingsley Lake
12 would be required to dial ten digits to call Starke, Lawtey and
13 Raiford customers. Likewise, customers in Starke, Lawtey and
14 Raiford would be required to dial ten digits to call Kingsley Lake
15 customers. While it is true that in an overlay, all of these calls
16 would also have to be dialed with ten digits, when an NPA is split,
17 customers expect that at least they will maintain seven-digit local
18 dialing. This is especially true where there is a high level of
19 community of interest such as the community of interest between
20 Kingsley Lake and the Lawtey, Raiford and Starke communities.

21
22 Q. Is there another reason why the split should be along the
23 Bradford/Clay county boundary?

1 A. Yes. The 964 NXX in Starke serves Starke customers in both
2 Bradford and Clay counties. An NPA split between the two counties
3 will cause confusion among Starke customers because approximately
4 70 Starke customers will have one NPA while the remaining 7,400
5 will have a different NPA although they will maintain the same NXX.
6 Sprint recommends that the split not be Alternatives 4, 6 or 16B.
7 And, if one of these alternatives were selected, the split not
8 follow the county boundary but rather the exchange boundary between
9 the Starke and Kingsley Lake exchanges. Sprint understands that
10 the Commission has historically avoided drawing an NPA line through
11 an exchange boundary.

12
13 Q. How will an NPA split along the Bradford/Clay county line affect
14 Sprint in the Kingsley Lake, Starke and Lawtey exchanges?

15
16 A. If Kingsley Lake, which is a remote office hosted by the Starke
17 DMS-10 switch, is placed in an NPA different from Starke, then new
18 911 trunks will be needed to properly identify the new NPA to PSAPs
19 from customers that are in Clay County but are being served from a
20 Starke NXX. Also, with two NPAs in the Starke office, an additional
21 home NPA translation table and associated data would have to be
22 created and maintained in the Starke central office. The Starke
23 central office would require additional software packages as well
24 as additional switch memory. Having two NPAs in the Starke office
25 would also require additional operator trunk groups from Starke to

1 Sprint's Tallahassee operator group as well as between Tallahassee
2 and AT&T and Starke and AT&T. These problems can be avoided if the
3 Commission avoids drawing any NPA line east of the westernmost
4 Starke, Kingsley Lake and Lawtey boundaries within the Sprint
5 service territory. Sprint does not believe that the Commission has
6 heard any evidence in this proceeding that demonstrates that
7 locating the NPA boundary strictly along the county line will
8 outweigh the cost and inconvenience imposed on customers and
9 companies.

10
11 Q. Does that conclude your testimony?

12
13 A. Yes, it does.