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Via Hand Delivery

June 23, 2000

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

ORIGINAL

RECEIVED - FPSC  
00 JUN 23 PM 4:42  
RECORDS AND  
REPORTING

Re: Docket Nos. 99455-TL, et al: Posthearing Statement of Sprint

Dear Ms. Bayó:

Enclosed with this letter are the original and 7 copies of the Posthearing Statement of Sprint in this matter. Please indicate filing by stamping a copy of this letter and returning same to the undersigned.

Sincerely,

Charles J. Rehwinkel

Enclosure

APP	_____
CAF	_____
CMB	<u>alter</u>
COM	<u>3</u>
CTR	_____
ECR	_____
LEG	<u>I</u>
OPC	_____
PAI	_____
RGO	_____
SEC	<u>I</u>
SER	_____
OTH	<u>Leach dkt</u>

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W. Lockard  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07700 JUN 23 8

FPSC-BUREAU OF RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of  
proposed numbering plan relief  
for the 305/786 area code - Dade  
County and Monroe County/Keys  
Region.

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DOCKET NO. 990455-TL

RECEIVED-FLPSC  
03 JUN 23 PM 4:13  
REGULATORY AND  
REPORTING

In re: Request for review of  
proposed numbering plan relief  
for the 954 area code.

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DOCKET NO. 990457-TL

In re: Request for review of  
proposed numbering plan relief  
for the 561 area code.

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DOCKET NO. 990456-TL

In re: Request for review of  
proposed numbering plan relief  
for the 904 area code.

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DOCKET NO. 990517-TL

FILED: June 23, 2000

POSTHEARING STATEMENT OF SPRINT

Sprint-Florida, Inc. and Sprint Communications Company Limited Partnership, and Sprint PCS (collectively "Sprint") hereby files its posthearing brief in this matter.

Statement of Basic Position:

Sprint supports the industry consensus alternatives for all NPAs. As demonstrated in the testimony of Sandra Khazraee, Sprint does not support alternatives 4, 6 & 16B (904 NPA).

DOCUMENT NUMBER-DATE  
07700 JUN 23 08  
FPSC-REGULATORY REPORTING

Issues

ISSUE 1- A: Should the Commission approve the industry's consensus relief plans for the following area codes:

(A) - (D):

Sprint Position: Yes.

ISSUE 1- B: If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:

(A) - (C):

Sprint Position: No Position.

(D):

Sprint Position: Sprint has no position on the 904 NPA, except that, as proposed, Alternatives 4, 6 & 16B should not be adopted for the reasons stated in witness Khazraee's testimony. (Tr. 220-223).

ISSUE 2-A: What number conservation measure(s), if any, should be implemented for the following area codes:

Sprint Position: Based on the record the only conservation measure the Commission should consider are the thousands block number pooling trials consistent with the revised plan submitted by the Joint Petitioners on in Docket No. 981444-TP. See, Order PSC-00-1046-PAA-TP.

ISSUE 2-B: If conservation measures are to be implemented, when should they be implemented?

Sprint Position: Based on the record the Commission should only consider implementation of thousand block number pooling trials on a time frame consistent with the revised plan submitted by the Joint Petitioners on in Docket No. 981444-TP. See, Order PSC-00-1046-PAA-TP.

Issue 3: What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:

Sprint Position: If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls. For geographic splits, dialing patterns should be unaffected except for interNPA calls, which should be dialed on a 10- or 11- digit basis as appropriate.

Issue 4: What is the appropriate relief plan implementation schedule for the following area codes:

A - D:

Sprint Position: The Commission should establish an implementation schedule consistent with the overlay ordered in Docket No. 980671-TL (407 NPA) or the geographic split ordered in Docket No. 990223-TL (941 NPA).

Argument:

Sprint's position in this docket is simple. As Witness Khazraee has detailed, the Commission should only consider plans that do not disrupt communities of interest by causing implementation of 10 - digit dialing on local calling routes that

are currently seven - digit dialed. (Khazraee, Tr. 220-223.) Furthermore, Sprint urges the Commission to take note that separating the Kingsley Lake exchange from the Starke exchange will impose an increased cost to Sprint by separating the host and remote switches. (Id.) In addition to community of interest and dialing pattern concerns this is further reason not to draw adopt alternatives 4, 6 & 16B. As was done in Docket No. 990223-TL, the Commission has historically avoided bisecting exchanges with NPA lines. There is no compelling reason to do so in this case.

Sprint believes that the number conservation aspect of this case is largely resolved with respect to any relief activity that must occur. The number pooling measure adopted in Docket No. 981444-TP will insure added life to the plans adopted in this case. These measures will not allow the Commission to avoid implementing relief or to delay it. The Commission must implement meaningful relief prior to the exhaust of the last NXX in these NPAs. There appears to be no dispute about this.

*Sprint will not address any of the issues raised by the City of Deltona relating to calling scopes and rates. While Sprint recognizes that the City and its residents have legitimate concerns about calling scopes and while Sprint has tried to work with Deltona on them in the recent past, these issues are not before the Commission nor are they within the jurisdiction of the Commission.*

*Finally, with respect to the actual number that might be used in any split of the 904 NPA. Sprint reserves any and all rights to respond to any request that creates operational or other problems to Sprint. See, Transcript at 229-237. As any such issue is not ripe or even included in this Docket, any comment at this time is premature.*

Conclusion.

For the reasons stated herein and based on the record of this case, Sprint urges that the Commission exercise its judgement to implement the best plans from those offered into evidence in this case. However, the Commission should refrain from adopting alternatives 4, 6 & 16B.

Respectfully submitted this 23rd day of June 2000.



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CERTIFICATE OF SERVICE  
DOCKET NO. 990445-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 23rd day of June, 2000 to the following:

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A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", written over a horizontal line.

Charles J. Rehwinkel