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RECORDS AND REPORTING

February 6, 2001

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

Re: Docket No. 000604-TP Direct Testimony of Sandra A. Khazraee

Dear Ms. Bayó:

Enclosed for filing is the original and fifteen (15) copies of the Direct Testimony of Sandra A. Khazraee.

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,

Susan S. Masterton

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DOCUMENT NUMBER-DATE

01701 FEB-6

FPSC-RECORDS/REPORTING

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **SPRINT'S DIRECT TESTIMONY**

3 **OF**

4 **SANDRA A. KHAZRAEE**

5
6
7
8 **Q. Please state your name and business address.**

9
10 **A.** My name is Sandra A. Khazraee. My business address is
11 Sprint, 1313 Blair Stone Road, Tallahassee, Florida
12 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
20 interrogatories and ensuring compliance with all FPSC
21 orders. I interface regularly with Sprint employees at
22 all levels within the company to carry out my job
23 responsibilities.

24
25 **Q.** What is the purpose of your testimony?

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01701 FEB-06

FPSC-RFC 1500/REPORTING

1 A. The purpose of my testimony is to provide and support
2 Sprint's position regarding the appropriate relief
3 measures for the 941 NPA.
4

5 **Q. What alternatives were considered by the industry as**
6 **possible relief plans for 941?**
7

8 A. Four Alternatives were considered by the industry.
9 Alternative 1 is an all-services distributed overlay
10 alternative which would overlay a new area code on the
11 same geographic area covered by the existing 941 NPA. All
12 existing customers would retain their area code and
13 therefore would not have to undergo any telephone number
14 change. The remaining three alternatives considered were
15 geographic splits, each of which would divide the
16 existing 941 NPA into two areas. One of the areas would
17 retain the existing 941 NPA while the other area in each
18 split alternative would receive the new NPA. The first of
19 the geographic split alternatives, Alternative 2 proposes
20 a geographic split with the dividing line following the
21 LATA boundary between the Tampa and Fort Myers LATAs.
22 Alternative 3 proposes a geographic split with the
23 dividing line following the boundary between the Punta
24 Gorda and Port Charlotte rate centers. Alternative 4
25 proposes a geographic split with the dividing line

1 following the boundary between the Punta Gorda and North
2 Fort Myers rate centers.

3

4 **Q. What does Sprint recommend as the appropriate relief plan**
5 **for the 941 NPA?**

6

7 A. The industry unanimously agreed at a meeting held July
8 11, 2000 that Alternative 1, the all-services overlay
9 would be the preferred form of relief in the 941 NPA.
10 Sprint was a participant at that meeting and is in
11 agreement that Alternative 1 is the preferred
12 alternative.

13

14 **Q. Why does Sprint believe the overlay is the appropriate**
15 **relief option for the 941 NPA?**

16

17 A. The overlay seems to be the best long-term solution for
18 this area. By approving an overlay, no existing customers
19 within the 941 area would be required to take a number
20 change. Additionally, all customers within the 941 area
21 would know that any call within this area would have to
22 be dialed with ten digits. All of the geographic splits
23 proposed will require some split in existing communities
24 of interest and therefore, some customers will be
25 required to dial 10 digits on certain local calls but

1 seven digits on other local calls.

2

3 **Q. If the Commission only considers geographic split**
4 **alternatives, which geographic split alternative would**
5 **Sprint recommend and why?**

6

7 A. Although Sprint's first choice is the all-services
8 overlay, if a split is required, then Alternative 4 would
9 be the preferred split. Alternative 2 was least favored
10 of all the plans because it splits communities of
11 interest in the Englewood, Port Charlotte, North Port
12 areas. There was considerable testimony from residents of
13 these areas in the previous 941 NPA relief docket, which
14 established this area as having a very high degree of
15 community of interest. Alternative 3 was also eliminated
16 as a favorable alternative because this alternative
17 splits the EAS local calling route between Punta Gorda
18 and Port Charlotte with the proposed new NPA boundary.
19 That leaves Alternative 4 as the least disruptive of the
20 geographic split proposals. There is no EAS calling
21 between Punta Gorda and North Fort Myers although there
22 is ECS calling between the two rate centers.

23 **Q. What number conservation measures, if any, should the**
24 **Commission implement?**

25

1 A. The Commission should not implement any number
2 conservation measures in this docket. Docket Number
3 981444-TP - Investigation into Number Conservation
4 Measures is open and this docket is the appropriate
5 vehicle for considering number conservation measures. By
6 considering the number conservation issues in this
7 generic docket, all parties who may be affected by any
8 decisions would be more likely to participate.
9 Additionally, any the measures approved in the generic
10 docket could be applied uniformly throughout the state.
11

12 **Q. If number conservation measures are to be implemented,**
13 **when should they be implemented?**
14

15 A. As stated in the previous response, number conservation
16 measures should not be included in this docket. Rather,
17 they should be considered in the generic number
18 conservation docket, Docket Number 981444-TP.
19

20 **Q. Does that conclude your testimony?**
21

22 A. Yes, it does.
23
24
25

CERTIFICATE OF SERVICE

DOCKET NO. 000604-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 6th day of February, 2001 to the following:

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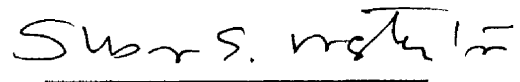
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