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October 5, 2001

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 010743-TL 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.

Copies of this have been served pursuant to the attached Certificate of Service.

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

Enclosure

DOCUMENT NUMBER-DATE
12726 OCT-5 01
FPSC-COMMISSION CLERK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

SANDRA A. KHAZRAEE

Q. Please state your name and business address.

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

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

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

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide and support Sprint's position

1 regarding the appropriate relief measures for the 407/321 NPA.

2

3 Q. What alternatives were considered by the industry as possible relief plans for
4 407/321?

5

6 A. Alternative 1 is an all-services distributed overlay alternative which would overlay a
7 new area code over the same geographic area covered by the existing 407/321 NPAs.
8 The 321 only NPA which covers Brevard County would remain as is. All existing
9 customers would retain their area code and therefore would not have to undergo any
10 telephone number change.

11

12 Alternative 2 was another all-services distributed overlay considered. In
13 Alternative 2, the new NPA would be assigned to the entire geographic area covered by
14 the existing 407/321 overlay plus the Brevard County portion of the 321 only NPA.

15

16 Alternative 3, another all-services distributed overlay proposed assigning a new
17 NPA to the same geographic area as the 407/321 overlay. Within that overlay
18 area, no additional 321 codes would be assigned. Rather, the remaining 321 codes
19 would be reserved for future use within the Brevard County 321 area. All new codes
20 required within the existing 407/321 overlay would be assigned from the new NPA.

21

22 Q. What method of area code relief plan should the Commission approve for the
23 407/321 area codes?

24

25 A. The industry agreed by consensus at a meeting held April 3, 2001 that

1 Alternative 3 would be the preferred form of relief in the 407/321 NPAs. Alternative 3
2 is the all-services distributed overlay which recommends that Brevard County maintain
3 only the 321 NPA and which reserves the remaining unassigned 321 NXXs for Brevard
4 County. Sprint was a participant at that meeting and is in agreement that Alternative 3
5 is the preferred alternative.

6

7 Q. Why does Sprint believe that Alternative 3 is the appropriate relief option for the
8 407/ 321 NPAs?

9

10 A. Alternative 3, which recommends a new overlay code over the same geographic
11 area as the existing 407/321 overlay, was seen as the best alternative for several
12 reasons. The customers within the existing 407/321 overlay have already been educated
13 regarding an overlay and currently dial their local calls as 10-digit. Alternative 1 would
14 not have provided any relief for Brevard County. Alternative 2, which had the lowest
15 projected life, would have incorporated Brevard County into an overlay for the first
16 time and the Brevard County customers would have to begin dialing all their local calls
17 with 10-digits.

18

19 Q What should the dialing pattern be for the method of relief chosen for the following
20 types of calls? Local, Toll, EAS, ECS

21

22 A. The industry agreed by consensus at the April 3 meeting that the existing dialing plan
23 should be maintained. Within the overlay, all local calls and EAS calls must be dialed
24 with ten digits. Toll calls must be dialed with one plus ten digits. ECS calls can either
25 be dialed with one plus ten or ten digits depending on whether the customer wants the

1 call carried and billed by their intraLATA toll provider as a toll call or by Sprint –
2 Florida as an ECS call.

3

4 Q. When should area code relief be implemented for the 407/321 area codes?

5

6 A. Relief should be implemented with activation of the new NPA by the beginning of the
7 4Q2002 assuming that there is a commission order before the end of the year, 2001.

8

9 Q. What type of mechanisms, not previously considered, if any, should the Commission
10 approve to address Volusia County's area code and local dialing
11 issues, and if so, when?

12

13 A. Sprint believes that the NPA relief docket would not be the appropriate place to
14 consider Volusia County's area code and local dialing issues. These issues have been
15 considered in previous dockets and customer balloting has not indicated a strong desire
16 on the part of the customers for any solution which will require a number change. If
17 new alternatives are to be considered, they should be considered in a separate docket.

18

19 Q. Pursuant to the Florida Statutes, FCC delegated authority, or both, does the Commission
20 have the authority to require telecommunications carriers to
21 place 386 numbers in their Sanford exchange to allow customers in the Osteen area to
22 get new lines and migrate their existing services to the 386 numbers?

23

24 A. This issue is a legal issue and will be addressed fully in Sprint's brief.

25

1 Q. Does that conclude your testimony?

2

3 A. Yes, it does.

**CERTIFICATE OF SERVICE
DOCKET NO. 010743-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 5th day of October, 2001 to the following:

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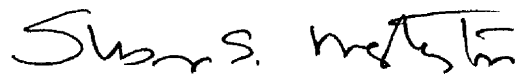
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