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April 18, 2002

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. 990649B-TP

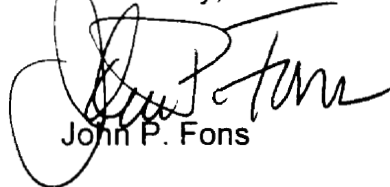
Dear Ms. Bayo:

Enclosed for filing on behalf of Sprint-Florida, Inc. are the original and fifteen (15) copies of the Direct Testimony of Michael A. Fuller Adopting the Testimony of Terry D. Talken.

Copies are being served on the parties in accordance with 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.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record

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DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **MICHAEL A. FULLER**

5 **ADOPTING THE TESTIMONY**

6 **OF**

7 **TERRY D. TALKEN**

8
9 **Q. Please state your name, business address, employer and current**
10 **position.**

11
12 A. My name is Michael A. Fuller. My business address is 6450 Sprint Parkway,
13 Overland Park, Kansas, 66251. I am presently employed as Manager –
14 Network Costing, Sprint/United Management Company.

15
16 **Q. Please describe your educational background and relevant work**
17 **experience.**

18
19 A. I received a Bachelor of Arts degree from Western Kentucky University.
20 Bowling Green, Kentucky, with a major in Business. Subsequently, I received
21 a Masters of Business Administration degree, with an emphasis in finance
22 and economics, from the University of Kansas, Lawrence, Kansas.

23
24 From 1978 to 1988, I was employed by Standard Havens Construction
25 Company as a construction product manager. My duties included

1 developing cost estimates and pricing models used to develop products and
2 services sold in the air pollution control markets.

3

4 I have been employed by Sprint Corporation or one of its predecessor
5 companies since 1988. From 1988 to 1991 I was Manager – Policy and
6 Economic Targeting. I developed economic policy, indicating which products
7 were the most beneficial to Sprint utilizing life cycle analysis to cover all
8 Sprint costs.

9

10 From 1991 to 1994, I was Group Manager – Access Pricing. I was
11 responsible for pricing dedicated access products. From 1994 to 1996, I was
12 Group Manager – Strategic Pricing. I was responsible for pricing business
13 voice products in all state and federal jurisdictions. I developed and
14 implemented strategic plans for pricing long distance voice products. From
15 1996 until 2000, I was Group Manager – Strategic Planning. I performed
16 competitor and economic impact analysis to assist management in both
17 short-term tactical decisions and long-term strategic group planning.

18

19 In 2000 I was promoted to Group Manger – Broadband Product
20 Management. I was responsible for product management of a consumer
21 broadband product line. I performed financial analyses for business cases
22 that determined the profitability of developing an xDSL access product for
23 delivering broadband content to residential consumers. I was a guest
24 speaker at the Residential Broadband conference in Miami in January 2001,
25 sponsored by the Institute for International Research (IRR). My topic was

1 Achieving DSL Mass Market Penetration: Examining How To Market And
2 Deliver Broadband Multimedia Solutions To The Residential Sector. In May
3 of 2001, I accepted my current position as Manager – Network Costing.
4

5 **Q. Have you read and reviewed the direct testimony of Terry D. Talken**
6 **dated November 7, 2001?**

7

8 A. Yes, I have reviewed Mr. Talken's direct testimony.

9

10 **Q. Have you read and reviewed the narratives, cost studies and work**
11 **exhibits supported by Terry D. Talken dated November 7, 2001?**

12

13 A. Yes, I have reviewed all of Mr. Talken's narratives, costs studies and work
14 exhibits.

15

16 **Q. Do you adopt the filing of Mr. Terry D. Talken?**

17

18 A. Yes, I am adopting the testimony of Mr. Talken dated November 7, 2001 in
19 its entirety, supporting the Sprint-Florida, Inc., ("Sprint") recurring cost
20 studies associated with the following unbundled network elements:

21 Signaling Networks and Call-related databases

22 E911 Services

23

24

1 **Q. Does this conclude your testimony?**

2

3 **A. Yes.**

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, hand delivery (*) or U. S. Mail this 18th day of April, 2002, to the following:

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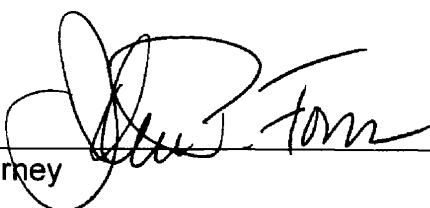
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