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October 27, 1993

ORIGINAL
FILE

Mr. Steve C. Tribble
Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

In Re: Petition of INTERMEDIA COMMUNICATIONS OF FLORIDA,
INC. for Expanded Interconnection for AAVs
within LEC Central Offices: Docket No. 921074-TP

Dear Mr. Tribble:

Please find enclosed an original and 15 copies of Sprint Communications Company Limited Partnership's ("Sprint") Addendum to its Posthearing Brief. Sprint's Brief was filed with the Florida Public Service Commission ("Commission") on October 22, 1993 but was not in the standard format of a Posthearing Statement. Sprint is, therefore, filing an addendum to its Brief reaffirming its position on each issue as set forth in its Prehearing Statement and Direct Testimony filed in the above-reference docket.

Also enclosed is a copy of the Brief along with the Addendum on a 5 1/4" high density diskette in Word Perfect 5.1 format.

Please acknowledge receipt of this filing by date stamping the duplicate copy and returning it to me in the enclosed self-addressed stamped envelope.

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- RCH cc: All Parties of Record
- SEC 1 _____
- WAS _____
- OTH _____

Thank you for you assistance.

Sincerely,

Chanthina R. Bryant
Chanthina R. Bryant
Attorney, State Regulatory

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Petition of INTERMEDIA)
COMMUNICATIONS OF FLORIDA, INC. for)
Expanded Interconnection for AAVs)
within LEC Central Offices)

Docket No. 920174-TL

Filed: Oct. 28, 1993

**ADDENDUM TO BRIEF OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

COMES NOW, Sprint Communications Company Limited Partnership ("Sprint") and hereby submits an Addendum to its Brief filed on October 22, 1993 in the above-captioned docket.

I. BASIC POSITION

Sprint supports expanded interconnection and central office collocation for the purpose of facilitating the competitive provisioning of private line and special access services. A policy requiring expanded interconnection will ensure a more competitive access market and rational pricing of LEC special access services.

II. ISSUES AND POSITIONS

ISSUE 1: Is expanded interconnection for special access and/or private line in the Public Interest?

Yes. Expanded interconnection encourages competitive entry in the provisioning of access services which is, at present, almost exclusively being provided by LECs. The long term benefits of lower prices, product innovation, higher quality service and network diversity would be realized by both the end-user and the telecommunications industry.

DOCUMENT NUMBER-DATE

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FPC-RECORDS/REPORTING

ISSUE 2: How Does the FCC's order on expanded interconnection impact the Commission's ability to impose forms and conditions of expanded interconnection that are different from those imposed by the FCC's order?

Stipulated.

ISSUE 3: Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

Stipulated.

(Sprint addresses this issue in Item 1 of its Brief to clarify its testimony and to provide a detailed explanation of its position regarding dual use which was discussed at length during the Hearing.)

ISSUE 4: Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

No position.

ISSUE 5: Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

No position.

ISSUE 6: Should the Commission require physical and/or virtual collocation?

The Commission should mirror the interstate requirements regarding collocation arrangements. The FCC ordered LECs to provide physical collocation arrangements with exemptions for inadequate central office space, negotiated virtual arrangements or where states have established a virtual collocation requirements.

ISSUE 7: What LECs, if any, should be required to provide expanded interconnection?

The Commission should require all Tier 1 LECs to file expanded interconnection tariffs for the provisioning of special access services.

ISSUE 8: Where should expanded interconnection be offered?

Expanded interconnection offerings should be required where interconnectors have indicated a desire to collocate. While the Commission should nurture the competitive process, the decision of where an interconnector wants to collocate should be left up to the interconnector.

ISSUE 9: Who should be allowed to interconnect?

Stipulated.

ISSUE 10: Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnectors?

Stipulated.

ISSUE 11: Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

Yes. The Commission should mirror the FCC's policy on physical collocation, with one exception: Virtual collocation should be required when physical space becomes exhausted.

ISSUE 12: Should collocators be required to allow LECs and other

parties to interconnect with their networks?

Yes. Interconnectors should be required to offer interconnection at its point of collocation.

ISSUE 13: What standards should be established for the LECs to allocate space for collocators?

Physical collocation should be required on a first-come first-served basis. If central office space is exhausted, the LEC should be required to offer a virtual arrangement equitable to physical.

ISSUE 14: Should the Commission allow expanded interconnection for non-fiber optic technology?

Expanded interconnection for non-fiber technologies should be limited to microwave transmission only.

ISSUE 15: If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

The Commission should adopt the FCC's policy on density zone pricing, with modification. LECs should be allowed to initiate zone pricing in study areas regardless of whether competitive entry has occurred. In addition, LECs should be permitted to offer different initial rates in each density zone.

ISSUE 16: If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the LEC?

The Commission should establish a policy requiring expanded interconnection offerings and central office space usage to be tariffed.

ISSUE 17: Should all special access and private line providers be required to file tariffs?

Yes. But only because non-dominant carriers are currently required to file tariffs in Florida. Since non-dominant carriers may become interconnectors and would be required to file tariffs, all interconnectors should be required to file tariffs to prevent discrimination.

ISSUE 18: What separations impact will expanded interconnection have on the LECs?

No Position.

ISSUE 19: Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

Issue deleted by stipulation of the parties.

ISSUE 20. How would ratepayers be financially affected by expanded interconnection?

Expanded interconnection will stimulate the provisioning of all telecommunications services. Ratepayers may need to contribute more towards the cost of providing local service but only to a point short of impacting universal service. Sprint supports targeted assistance to ratepayers in need and is willing to contribute toward providing same.

ISSUE 21: Should the Commission grant ICI's petition?

Yes. The Commission should grant ICI's Petition to

interconnect pursuant to the terms and conditions developed in this proceeding for expanded interconnection.

PERMANENT RECORD

SOUTHWORTH CO. B.S.A.

152 COTTON FIELD ROAD

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and foregoing Brief in Docket No. 921074-TP; "PETITION BY INTERMEDIA OF FLORIDA, INC. FOR EXPANDED INTERCONNECTION FOR AAVS WITHIN LEC CENTRAL OFFICES" via first class mail, by depositing same with sufficient postage and properly affixed and properly addressed to:

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This 27th day of October, 1993.

**SPRINT COMMUNICATIONS COMPANY LIMITED
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BY: Chanthina R. Bryant
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