## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell ) Telephone and Telegraph Company

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Docket No. 920260-TL Filed: November 8, 1996

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## SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S POST-HEARING STATEMENT OF ISSUES AND POSITIONS

Sprint Communications Company Limited Partnership ("Sprint"), through its undersigned counsel and pursuant to Commission Rule 25-22.056(3), Florida Administrative Code, and the Commission's Prehearing Order, hereby submits its Post-Hearing Statement of Issues and Positions in the above-styled docket.

#### I. BASIC POSITION

\*\* SPRINT'S BASIC POSITION: The Commission should adopt the Joint Proposal of FIXCA, AT&T, MCI, Sprint and AT&T Wireless ("Joint Proposal") to implement the \$48 million rate reduction approved by the Commission in Order No. PSC-94-0172-FOF-TL. The rate reductions should be accomplished by elimination of the RIC from access charges, and by reductions in PBX trunk rates, DID service rates and mobile interconnection rates as specified in the Joint Proposal. BellSouth's proposal to target reductions in services where it anticipates competition should be rejected.

## D. Issues and Positions

CAF ISSUE 1. Below are listed the proposals of various interested CMU parties to this proceeding with respect to the disposition of the scheduled 1996 unspecified rate reductions. Which, if any, should CTR be approved? EAG -

1 BellSouth Telecommunications, Inc.: millions A) 5 11 Reduce switched access (introduce zone density) \$16.40 Reduce PBX rates and introduce term contracts 2) 13.45 Waive certain business and residential 3) Secondary Service Order charges 5.81 SEC 1

DOCUMENT NUMBER-DATE

11934 NOV-8% ERVIN, VARN, JACOBS & ERVIN TALLAHASSEE, FLORIDA

FPSC-RECORDS/REPORTING

#### millions

4) 5) 6)	Reduce First Line Connection charges (Business) Introduce Area Plus for Business Eliminate usage charge on Remote Call Forwarding	3.22 2.25 2.01
7)	Reduce DID recurring and non-recurring charges	1.88
8j	Credit for ECS routes implemented	1.10
9)	Reduce Business Line monthly rates	
	in Rate Group 12	.62
10)	Reduce Megalink interoffice rates	.58
11)	Reduce WATS and 800 Service access line charges	.36
12)	Eliminate the Secondary Service Order charge	
	for WatsSaver	.30
13)	Reduce SNAC charges for Business	.07
14)	Reduce DS-1 interoffice mileage rates	<u>\$.04</u> \$48.09

# B) Joint Proposal of ATT, MCI, Sprint Communications, FIXCA, Ad Hoc and McCaw Communications:

		<u>millions</u>
1)	Reduce PBX and DID trunk charges	\$11.00
2)	Eliminate the Residual Interconnection Charge	35.00
3)	Reduce mobile interconnection rates	2.00
		\$48.00

C) Public Counsel: Establish a reserve fund to assist BellSouth Telecommunications, Inc., customers who have experienced problems with conversion to the 954 NPA.

## D) FCTA: Eliminate nonrecurring charges for interconnection trunks and special access circuits ordered by ALECs.

E) Palm Beach Newspapers, Inc./Florida Today: Reduce usage rates for N11 service to \$.02 per minute.

\*\* SPRINT'S POSITION: The three components of the Joint Proposal

should be approved.

(1) The "make-whole" RIC rate element implemented under rate of return regulation should be eliminated.

(2) Reduction of PBX and DID rates will help to achieve consistency between functionally equivalent services, particularly with BellSouth's ESSX service.

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(3) Reduction in mobile interconnection rates will achieve reasonable parity between IXC access charges and rates paid by mobile service providers.

**ISSUE 2:** To the extent the Commission does not approve the plans proposed by BellSouth, Public Counsel, FCTA, Palm Beach Newspapers, Inc./Florida Today and AT&T, MCI, Sprint, FIXCA, Ad Hoc and McCaw, how should the Commission implement the scheduled rate reduction?

\*\* SPRINT'S POSITION: The Joint Proposal should be adopted. No

alternative plan is necessary.

**<u>ISSUE 3:</u>** What should be the effective dates of the approved tariffs?

\*\* <u>SPRINT'S POSITION:</u> The rates approved by the Commission to implement the \$48 million reduction should be effective not later than 30 days from the Commission's final order in the docket.

DATED this Straay of November, 1996.

Respectfully submitted,

-EVERETT BOYD, JR.

Ervin, Varn, Jacobs & Ervin Post Office Drawer 1170 Tallahassee, FL 32302 (904) 224-9135 and

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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. day of November, 1996, to the following: Mail, on the Martha Brown Joseph P. Gillan Division of Legal Services J.P. Gillan and Associates Florida Public Service Commission Florida Interexchange Carriers Assn. 2540 Shumard Oak Boulevard, Room 370 Post Office Box 541038 Tallahassee, FL 32399-0850 Orlando, FL 32854-1038 Robin Norton David Larimer Division of Legal Services Florida Today Florida Public Service Commission Post Office Box 419000 2540 Shumard Oak Boulevard, Room 270 Melbourne, FL 32941-9000 Tallahassee, FL 32399-0850 Dan B. Hendrickson Rick Wright Post Office Box 1201 Division of Audit & Finance Tallahassee, FL 32302 Florida Public Service Commission 2540 Shumard Oak Boulevard Richard Melson Tallahassee, FL 32399-0850 Hopping Boyd Green & Sams Post Office Box 6526 Jack Shreve Tallahassee, FL 32314 Office of Public Counsel 111 West Madison Street, Room 812 William H. Higgins Tallahassee, FL 32399-1400 AT&T Wireless Services of Fla. 250 South Australian Avenue Susan Weinstock West Palm Beach, FL 33401 AARP 501 East Street, N.W. Washington, DC 20049 Martha McMillin MCI Telecommunications 780 Johnson Ferry Road, Suite 700 Michael W. Tye Atlanta, GA 30346 Tracy Hatch AT&T Communications Joseph McGlothlin 101 North Monroe Street, Suite 700 Vicki G. Kaufman Tallahassee, FL 32301-1549 McWhirter Law Firm 117 South Gadsden Street J. Phillip Carver Tallahassee, FL 32301 c/o Nancy H. Sims Southern Bell Floyd Self 150 South Monroe Street, Suite 400 Messer Law Firm Post Office Box 1876 Tallahassee, FL 32301-1556 Tallahassee, FL 32302 Benjamin Dickens Blooston Law Firm Michael Gross 2120 L Street, N.W. Assistant Attorney General Washington, DC 20037 Department of Legal Affairs The Capitol, PL-01 Tallahassee, FL 32399-1050 Douglas Metcalf Communications Consultants, Inc. Post Office Box 1148 Patricia Kurlin Winter Park, FL 32790-1148 Steve Brown Intermedia Communications, Inc. Monte Belote 3625 Queen Palm Drive Florida Consumer Action Network Tampa, FL 33619-1309 4100 W. Kennedy Boulevard, Suite 128 Tampa, FL 33609 Thomas F. Woods Dan Shorter Gatlin, Woods Law Firm Palm Beach Newpapers 1709-D Mahan Drive Post Office Box 24700 Tallahassee, FL 32308 West Palm Beach, FL 33416-4700

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