

ERVIN, VARN, JACOBS & ERVIN

THOMAS M. ERVIN, JR.
C. EVERETT BOYD, JR.
MELISSA FLETCHER ALLAMAN
ROBERT M. ERVIN, JR.
J. STANLEY CHAPMAN
PAMELA K. FRAZIER
DAVID R. WESTCOTT
ELIZABETH FLETCHER DUFFY

ATTORNEYS AT LAW
305 SOUTH GADSDEN STREET
P.O. DRAWER 1170 (32302)
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 224-9135
TELECOPIER (904) 222-9164

COUNSEL CONSULTANT
ROBERT M. ERVIN
OF COUNSEL
WILFRED C. VARN
JOSEPH C. JACOBS
RICHARD W. ERVIN
MARILYN K. MORRIS
LEROY COLLINS
(1908-1991)

November 25, 1996

VIA HAND DELIVERY

Honorable Blanca S. Bayo
Director - Records and Reporting
Florida Public Service Commission
Room 110
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 961150-TP

Dear Ms. Bayo:

Enclosed are an original and 15 copies of page 3 of the substitute direct testimony of Michael R. Hunsucker - as corrected. The original page 3 was filed as an attachment to Sprint's Notice of Adoption of Direct Testimony of Tony H. Key by Michael R. Hunsucker filed on November 21, 1996. Please place this corrected page 3 in the Commission file. Thank you.

Sincerely,



C. Everett Boyd, Jr.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Rel _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 2 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

CEBJr/bc
Enclosure

Cc: Nancy White, Esq.
Monica Barone, Esq.

1 Q. Have you testified previously before state regulatory commissions?

2 A. I have testified before the South Carolina Public Service Commission and the Pennsylvania Public
3 Utility Company.

4
5 Q. What is the purpose and scope of your testimony?

6 A. I am presenting testimony in support of Sprint Communications Company Limited Partnership's
7 ("Sprint") request for arbitration of proposed interconnection agreement with BellSouth
8 Telecommunications, Inc. ("BellSouth"). The Telecommunications Act of 1996 ("the Act") directs
9 companies like Sprint that desire to enter the local exchange service market as new entrants - so
10 called competitive local exchange companies ("CLECs") - to undertake contract negotiations with
11 incumbent local exchange companies ("ILECs"). If the CLEC and ILEC are not successful in
12 concluding contract negotiations under Sections 251 and 252 of the Act, either party may
13 exercise its right to request arbitration by the state regulatory body that regulates
14 telecommunications.

15 Sprint has undertaken negotiations pursuant to Sections 251 and 252 of the Act. Sprint and
16 BellSouth have failed to reach agreement on several crucial contract requirements. Sprint is thus
17 exercising its rights under the Act and is seeking arbitration of the contract negotiation disputes
18 that remain between the parties.

19 My testimony covers general policy matters, the need for operational parity between BellSouth
20 and Sprint, and most favored nation rights to rates, terms and conditions contained in any
21 BellSouth contract or tariff, branding issues, network interconnection, access to unbundled
22 network elements, and electronic system interface requirements between Sprint and BellSouth.
23 David Stahly also presents testimony concerning cost and price issues and requirements.

24
25 Q. Has Sprint attempted to negotiate a contract with BellSouth?

1 Q. Have you testified previously before state regulatory commissions?

2 A. I have testified before the South Carolina Public Service Commission and the Pennsylvania Public
3 Utility Company.

4
5 Q. What is the purpose and scope of your testimony?

6 A. I am presenting testimony in support of Sprint Communications Company Limited Partnership's
7 ("Sprint") request for arbitration of proposed interconnection agreement with BellSouth
8 Telecommunications, Inc. ("BellSouth"). The Telecommunications Act of 1996 ("the Act") directs
9 companies like Sprint that desire to enter the local exchange service market as new entrants - so
10 called competitive local exchange companies ("CLECs") - to undertake contract negotiations with
11 incumbent local exchange companies ("ILECs"). If the CLEC and ILEC are not successful in
12 concluding contract negotiations under Sections 251 and 252 of the Act, either party may
13 exercise its right to request arbitration by the state regulatory body that regulates
14 telecommunications.
15 Sprint has undertaken negotiations pursuant to Sections 251 and 252 of the Act. Sprint and
16 BellSouth have failed to reach agreement on several crucial contract requirements. Sprint is thus
17 exercising its rights under the Act and is seeking arbitration of the contract negotiation disputes
18 that remain between the parties.

19 My testimony covers general policy matters, the need for operational parity between BellSouth
20 and Sprint, and most favored nation rights to rates, terms and conditions contained in any
21 BellSouth contract or tariff, branding issues, network interconnection, access to unbundled
22 network elements, and electronic system interface requirements between Sprint and BellSouth.
23 David Stahly also presents testimony concerning cost and price issues and requirements.

24
25 Q. Has Sprint attempted to negotiate a contract with BellSouth?