BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI Telecommunications Corporation for arbitration) DOCKET NO. 961230-TP with United Telephone Company of Florida and Central Telephone Company) of Florida concerning interconnection) rates, terms, and conditions, pursuant to the Federal Telecommunications Act of 1996

) Filed: March 31, 1997

MOTION OF SPRINT-FLORIDA, INC. FOR STAY OF A PORTION OF THE COMMISSION'S ORDER ON PETITION FOR ARBITRATION

Pursuant to Rule 25-22.037(2), Florida Administrative Code, Sprint-Florida, Inc. ("Sprint") moves the Commission to stay that portion of its Order on Petition for Arbitration, Order No. PSC-97-0294-FOF-TP ("Order"), issued March 14, 1997, requiring the parties to "submit a written agreement memorializing this arbitration decision within 30 days" of the issuance date of the Order, stating as follows:

- The Commission's Order decided each of the unresolved issues in this proceeding pursuant to 47 U.S.C. §§ 251 and 252.1 As part of its Order, the Commission, pursuant to the terms of Section 252(e)(4) of the Act, directed the parties to submit a written agreement memorializing and implementing the arbitration decision within 30 days of the issuance date of the Order.
- 2. On March 31, 1997, within the time specified in Rule 25-22.060, Florida Administrative Code, Sprint filed its Motion for

¹ The Federal Telecommunications Act of 1996 ("Act"). DOCUMENT NUMBER-DATE

Reconsideration and/or Clarification addressing the Commission's decision on several issues resolved by the Commission's Order. In view of the fact that several issues decided by the Commission on arbitration are now subject to reconsideration and/or clarification, Sprint requests that the requirement to file a written agreement memorializing and implementing the Commission's arbitration decision at this time be deferred pending Commission resolution of Sprint's Motion for Reconsideration and/or Clarification. Under Section 252(e)(4) of the Act, the Commission has only 30 days after submission of an agreement adopted by arbitration to approve or reject the agreement. It is quite possible that the Commission will not be able to rule on Sprint's pending Motion for Reconsideration and/or Clarification within 30 days.

- 3. Additionally, in the event the Commission were to rule favorably on Sprint's Motion for Reconsideration and/or Clarification, the parties would again be required to submit a written agreement memorializing the Commission's decision disposing of the issues raised on reconsideration. Rather than presenting agreements to the Commission on a piecemeal basis, administrative efficiency suggests that the parties provide one written agreement addressing all of the Commission's arbitration decisions once those decisions are finally resolved.
- 4. Sprint, therefore, requests that the written agreement required by the Order be delayed until the Commission disposes of Sprint's Motion for Reconsideration and/or Clarification. It is

Sprint's intention to work with MCI to develop and submit the required written agreement implementing the Commission's arbitration decision within 30 days after the Commission disposes of Sprint's Motion for Reconsideration and/or Clarification. MCI should not be disadvantaged or harmed in the interim.

WHEREFORE, having stated valid reasons for staying the provision of the Commission's Order on Arbitration requiring a written agreement until the Commission disposes of Sprint's Motion for Reconsideration and/or Clarification, Sprint respectfully request that the Commission grant the requested stay.

Dated this 31st day of March, 1997.

Respectfully submitted,

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ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 31st day of March, 1997, to the following:

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