

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Proposed rule 25-24.845,)
F.A.C., customer Relations;)
Rules Incorporated, and proposed)
Amendments to Rules 25-4.003,)
F.A.C., Definitions; 25-4.110,,)
F.A.C., Customer Billing; 25-)
4.118, F.A.C., Interexchange)
Carrier Selection; 25-24.490,)
F.A.C., customer Relations;)
Rules Incorporated)

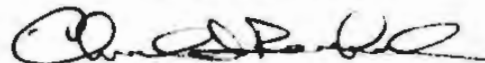
Docket No. 950003-TT

Filed: October 15, 1997

**SPRINT-FLORIDA INCORPORATED'S NOTICE OF SERVICE OF RESPONSES TO
CITIZENS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

NOTICE IS HEREBY GIVEN that Sprint-Florida, Incorporated's Responses to Citizens' First Request for Production of Documents, which were legally propounded by on September 11, 1997, was sent via hand delivery on October 15, 1997, to Charles J. Beck, Deputy Public Counsel, 801 Pepper Building, Tallahassee, Florida 32399.

Respectfully Submitted,



Charles J. Rehwinkel
General Attorney
Sprint-Florida, Incorporated
P.O. Box 2214
MC FTLHO0107
Tallahassee, Florida 32301
(850) 847-0244

DOCUMENT NUMBER-DATE
10599 OCT 15 5
FPSC-RECORDS/REPORTING

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

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Proposed rule 25-24.845,)
F.A.C., customer Relations;)
Rules incorporated, and proposed)
Amendments to Rules 25-4.003,)
F.A.C., Definitions; 25-4.110,)
F.A.C., Customer Billing; 25-)
4.118, F.A.C., Interexchange)
Carrier Selection; 25-24.490,)
F.A.C., customer Relations;)
Rules incorporated)

Docket No. 970882-TI

Filed: October 14, 1997

SPRINT-FLORIDA, INCORPORATED'S RESPONSES TO CITIZENS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 25-22.034, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, Sprint-Florida, Incorporated, by and through undersigned counsel, hereby responds, subject to the Motion for Temporary Protective Order filed October 13, 1997, to Citizens' First Requests for Production of Documents as set forth below.

1. Please provide all internal analyses, studies, reports, papers, or other documents performed by Sprint or performed at the request of Sprint regarding:
 - a. slamming or unauthorized PIC changes,
 - b. the level of or amount of slamming incidents that have been identified by Sprint
 - c. potential changes to rules or practices regarding changing primary interexchange carriers,
 - d. the effect of slamming on customers,
 - e. the effect of slamming either on Sprint, the local exchange industry
or
 - f. The effect of slamming on competition.

DOCUMENT NUMBER-DATE
10599 OCT 15 6
FPSC-RECORDS/REPORTING

Response: See attached documents. Additionally, some documentation related to PIC changes is voluminous and maintained either electronically or in files from which document retrieval will be difficult. Sprint-Florida will be willing to arrange for a mutually acceptable manner of providing these documents.

2. Please provide all intra-company memos, correspondence, and e-mail in your possession, custody or control regarding slamming.

Response: See attached documents.

3. Please provide each document in your possession, custody or control showing the name, address or telephone number of any customer that has complained to your company of slamming or unauthorized PIC since January 1, 1996.

Response: See attached documents. Additionally, some documentation related to PIC changes is voluminous and maintained either electronically or in files from which document retrieval will be difficult. Sprint-Florida will be willing to arrange for a mutually acceptable manner of providing these documents.

4. Please provide copies of your current training materials and directives to business office or marketing personnel dealing with handling of slamming complaints.

Response: See attached documents.

Please provide copies of all letters or other forms currently used to confirm sales to customers.

Response: See attached documents.

- 6. Please provide copies of every PIC change form processed by your company during the month of June 1997, including the reason for the change.**

Response: See attached documents. Additionally, some documentation related to PIC changes is voluminous and maintained either electronically or in files from which document retrieval will be difficult. Sprint-Florida will be willing to arrange for a mutually acceptable manner of providing these documents.

- 7. Please provide copies of all company practices regarding the handling of customers who claim to have been subjected to "slamming" or unauthorized PIC changes.**

Response: See attached documents.

- 8. Please provide each document in your possession, custody or control commenting on or evaluating the policies or practices of the Florida Public Service Commission or its staff regarding slamming.**

Response: See attached documents.

- 9. Please provide a copy of each PIC change order processed since January 1, 1996, where the PIC change was due to slamming.**

Response: See attached documents. Additionally, some documentation related to PIC changes is voluminous and maintained either electronically or in files from which document retrieval will be difficult. Sprint-Florida will be willing to arrange for a mutually acceptable manner of providing these documents.

Respectfully Submitted,



**Charles J. Rehwinkel
General Attorney
Sprint-Florida, Incorporated
P.O. Box 2214
MC FTLHO0107
Tallahassee, Florida 32301
(850) 847-0244**

**CERTIFICATE OF SERVICE
DOCKET NO. 970882-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 15th day of October, 1997 to the following:

Richard D. Nelson, Esq.
Hopping, Sams & Smith, P.A.
P. O. Box 6526
Tallahassee, Florida 32314

Michael J. Henry, Esq.
Martha P. McMullin, Esq.
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Diana Caldwell, Esq.
Florida Public Service Commission
Division of Appeals
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-7704

Ms. Beverly Y. Menard
GTE Florida Incorporated
106 East College Avenue, Suite 1440
Tallahassee, Florida 32301-1440

BellSouth Telecommunications, Inc.
Robert G. Beatty
Nancy B. White
c/o Nancy H. Sims
150 so. Monroe Street, Suite 400
Tallahassee, Florida 32301

Ms. Harriet Eudy
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060-3343

Mr. Bill Thomas
Gulf Telephone Company
P.O. Box 1007
Port St. Joe, FL 32457-1007

Mr. Robert M. Post, Jr.
Indiantown Telephone System, Inc.
P.O. Box 277
Tallahassee, Florida 34956-0277

Andrew O. Isar
Director, Industry Relations
Telecommunications
Reseller Association
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335-4461

Ms. Lynn G. Brewer
Northeast Florida Telephone
Company, Inc.
P.O. Box 485
Macclenny, Florida 32063-0485

Mr. Thomas McCabe
Quincy Telephone Company
P.O. Box 189
Quincy, Florida 32353-0189

Mr. John H. Vaughan
St. Joseph Telephone
& Telegraph Company
P.O. Box 220
Port St. Joe, Florida 32456-0220

Ms. Laurie A. Maffett
Frontier Communications
of the South, Inc.
180 S. Clinton Avenue
Rochester, N.Y. 14646-0400

Ms. Lynn B. Hall
Vista-United Telecommunications
P.O. Box 10180
Lake Buena Vista, Florida 32830-0180

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Tallahassee, Florida 32311

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs & Ervin
P. O. Drawer 1170
Tallahassee, Florida 32302

Michael A. Gross
Assistant Attorney General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street Room 812
Tallahassee, FL 32399-1400



Charles J. Rehwinkel
Attorney for
Sprint-Florida, Inc.
P.O. Box 2214 MC FTTLH00107
Tallahassee, FL 32316-2214
904/847-0244