



RECEIVED-FPSC

01 AUG 15 PM 4:42

Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

August 15, 2001

COMMISSION
CLERK

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 000828-TP Sprint's Response to BellSouth's Motion for
Resolution of Disputed Language and Sprint's Notice of Withdrawal of
Motion for Reconsideration

Dear Ms. Bayó:

Enclosed for filing are the original and fifteen (15) copies of Sprint's
Response to BellSouth's Motion for Resolution of Disputed Language and
Sprint's Notice of Withdrawal of Motion for Reconsideration. Copies of
these documents have been served by U.S. Mail pursuant to the attached
Certificate of Service.

Please acknowledge receipt and filing of the above by stamping the
duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Susan S. Masterton

Susan S. Masterton

Enclosure

APP _____
CAF _____
CMP _____
COM 5 _____
CTR _____
ECR _____
LEG 1 _____
OPC _____
PAI _____
RGO _____
SEC 1 _____
SER _____
OTH _____

RECEIVED & FILED
RLM
DOCUMENT NUMBER-DATE
FPSC-BUREAU OF RECORDS 00028 AUG 15 2001
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint)	
Communications Company Limited)	
Partnership for arbitration of)	DOCKET NO. 000828-TP
certain unresolved terms and)	
conditions of a proposed renewal)	
of current interconnection)	
agreement with BellSouth)	Filed: August 15, 2001
Telecommunications, Inc.)	
_____)	

**SPRINT'S RESPONSE TO BELL SOUTH'S MOTION FOR RESOLUTION OF
DISPUTED LANGUAGE**

Sprint Communications Company Limited Partnership ("Sprint") hereby files its Response to Motion for Resolution of Disputed Language, filed by BellSouth Telecommunications, Inc. ("BellSouth") with the Commission on August 9, 2001:

1. As stated in BellSouth's Motion, Sprint filed on July 9, 2001 a letter (included as Attachment A to BellSouth's Motion) stating its opposition to the inclusion of the language BellSouth is proposing regarding the implementation costs associated with BellSouth's obligation to provide at wholesale rates stand-alone vertical features for resale by Sprint. As stated in the letter, Sprint believes that the Commission's decision in the Global NAPs arbitration proceedings (Docket No. 991220-TP) is applicable to the language proposed by BellSouth. In that decision the Commission ruled that it would not incorporate contract language in connection with issues that were not specifically raised in either the petitioning party's arbitration Petition or the responding party's Response.

2. In the event that the Commission decides to consider BellSouth's proposed language regarding implementation costs associated with providing stand-alone vertical features for resale, Sprint urges the Commission to reject BellSouth's proposed language. The Commission has already ruled that BellSouth must provide vertical features to Sprint on a stand-alone basis at the wholesale discount, pursuant to BellSouth's obligations under Section 251 of the Telecommunications Act of 1996. BellSouth should not be allowed to undermine this fundamental principle by attempting to recover "implementation costs" associated with BellSouth's fulfillment of its statutory obligation.

For the reasons set forth above, Sprint urges the Commission to reject the language proposed by BellSouth and order the parties to execute the Interconnection Agreement submitted by the parties on July 9, 2001, without the disputed language.

Respectfully submitted this 15th day of August, 2001.



Susan S. Masterton
P.O. Box 2214
Tallahassee, FL 32316-221
850-599-1560

ATTORNEY FOR SPRINT

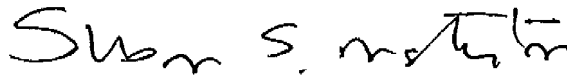
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint)
Communications Company Limited)
Partnership for arbitration of) DOCKET NO. 000828-TP
certain unresolved terms and)
conditions of a proposed renewal)
of current interconnection)
agreement with BellSouth) Filed: August 15, 2001
Telecommunications, Inc.)
_____)

NOTICE OF WITHDRAWAL OF MOTION FOR RECONSIDERATION

Sprint Communications Company Limited Partnership ("Sprint") hereby files this Notice that it withdraws its Motion for Reconsideration of the Commission's Order No. PSC-01-1095-FOF-TP filed on May 23, 2001. Sprint is withdrawing its Motion for Reconsideration because the Parties' interconnection agreement, filed with the Commission on July 9, 2001, addresses the issue raised by Sprint in the Motion for Reconsideration and, therefore, renders the Motion for Reconsideration moot.

Respectfully submitted this 15th day of August, 2001.



Susan S. Masterton
P.O. Box 2214
Tallahassee, FL 32316-2214
850-599-1560

ATTORNEY FOR SPRINT

CERTIFICATE OF SERVICE
Docket No. 000828-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 15th day of August, 2001 to the following:

Nancy White/J. Meza III
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Ms. Patricia Christensen, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

BellSouth Telecommunications, Inc.
R. Douglas Lackey/E. Earl Edenfield Jr.
675 W. Peachtree Street, NE
Suite 4300
Atlanta, GA 30375



Susan S. Masterton
Susan S. Masterton