

ORIGINAL



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

September 5, 2003

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RECEIVED-REC'D  
09 SEP -5 PM 3:14  
COMMISSION  
CLERK

RE: Docket No. 030868-TL

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and 1 copy of the Notice of Service of Citizens' second set of interrogatories (Nos. 27-42) and second set of production of documents (Nos. 25-29) to Sprint-Florida, Inc.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office

Sincerely,

H F. Rick Mann  
Associate Public Counsel

HFM/pwd  
Enclosures

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FPSC-BUREAU OF RECORDS

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition of Sprint-Florida, Incorporated, )  
To reduce intrastate switched network )  
Access rates to interstate parity in )  
Revenue neutral manner pursuant to )  
Section 364.164(1), Florida Statutes )  
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Docket no. 030868-TL

Filed September 5, 2003

**CITIZENS' SECOND SET OF INTERROGATORIES TO SPRINT-FLORIDA, INC**

Pursuant to § 350.0611(1), Fla. Stat. (2002), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.340, Florida's Citizens ("Citizens"), by and through Jack Shreve, Public Counsel, propound the following interrogatories to Sprint Florida, Inc. ("Sprint Florida") to be answered on or before Monday, September 22, 2003.

**INSTRUCTIONS**

1. Each interrogatory should be answered based upon your knowledge and information or belief, and any answer based upon information and belief should state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which an answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses.

2. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

### **DEFINITIONS**

1. The terms "Sprint," "Sprint-Florida" "you," "your," and the "company" encompass Sprint Florida together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of Sprint Florida.

### **INTERROGATORIES**

27. Provide the company's (and/or the related long distance affiliate) intrastate pricing units/volumes separately for MTS, and all "other optional calling plans" (all "other optional calling plans" should be provided separately if available, or on a combined basis), and provide this information for both residential and business customers. The above information should be provided for day, evening, and night/weekend categories. The information should be provided for both the test period, and the year prior to the test period.

28. Provide the company's (and/or the related long distance affiliate) average revenues per minute separately for MTS, and all "other optional calling plans" (all "other

optional calling plans” should be provided separately if available, or on a combined basis), and provide this information for both residential and business customers. The information should be provided for both the test period, and each of the two years prior to the test period.

29. Provide the average intrastate toll/long distance usage charges (billed/invoiced amount) separately for customers of residential MTS, all other combined residential “optional calling plans”, business MTS, and all other combined business “optional calling plans”. Provide this information for the test period and the prior twelve months. Explain if this includes any PICC charges.

30. Assume that the company’s proposal is adopted. Provide all information to show that the decrease in residential long distance rates (from the flow-through impact) will equal or exceed the increase in residential local rates. Provide all supporting calculations, assumptions, and explanations, and provide information in electronic format. Explain how this can be determined if the time period that long distance rate reductions will be in place is not known or determinable.

31. Assuming that the company’s proposal is adopted without changes (and that the company, and/or its long distance affiliate would flow-through the rate reductions) provide the company’s best estimate of the flow-through impact on reduced long distance rates for the company (and/or its long distance affiliate), and reduced long distance rates generally for all of the Florida long distance market for all other carriers.

In addition, assuming that the proposals for the other two LECs are adopted without change, provide the company's best estimate of how the combined flow-through impact of all LECs affects the long distance rates generally for all of the Florida long distance market for all other carriers. This information can be expressed as the best estimate impact of the reduction in average long distance revenues per minute, or some other basis for long distance rates. Provide all supporting calculations and explanations.

32. Address the following regarding potential long distance rate reductions for the company (and/or its long distance affiliate):

a) Explain if the company (and/or its long distance affiliate) will flow-through access reductions to long distance rates, and provide its best estimates of rates it will offer for each long distance service assuming its rebalancing proposal is adopted. Explain why the company will not reduce rates if this is the case.

b) Explain the time period the company will maintain its reduced long distance rates, before it subsequently increases long distance rates and explain the rationale for this approach.

c) Explain if the company will lower its "intrastate" long distance rates to match (or go below) the rates of all similar lower priced "interstate" long distance rates. Provide a list of these long distance services, and explain why the company will or will not reduce its intrastate rates to match (or go below) interstate rates.

33. Assume that the LEC (and/or its long distance affiliate) and other long distance carriers will flow-through long distance rate reductions to customers. Explain what actions the Florida Commission should take if the LEC and/or other long distance carriers subsequently increase their long distance rates (to negate all or some impact of the access flow-through) within a 6-month period, 1 year period, or some other period. Explain why local rates should be permanently increased if long distance rates will not be permanently decreased, or at least decreased for some substantial time period.

34. Explain if it is the company's position that the PICC will be eliminated and not paid by any end user group. Or explain if the PICC is just merely rebalanced and included in basic local rates of residential and business customers versus paid by these same customers as a recurring monthly PICC charge.

35. Explain all proof that access reductions will be flowed through equitably to both residential and business customers of the LEC (and/or its long distance affiliate) and other carriers, or indicate if carriers could choose to flow-through the entire impact of the access reduction to business long distance customers (and not residential long distance customers). Provide all information to support the company's statements or opinion.

36. Provide all known, quantifiable and explicit "net" benefits ("net" benefits implies showing both "positive" and "negative" impacts and showing that the positive

impacts exceed the negative impacts) that will accrue to the average residential customer as a result of the access reduction and rebalance to local rates, assuming the company's proposal is adopted. Also, provide the known duration (time period) of each benefit. Benefits may include (but not be limited to) net reductions in rates paid by customers, and any other benefits determined by the company.

37. Provide a list and description of all new services that will be introduced in Florida by the company (and the time period of introduction for each service) because of any benefit from reducing access and rebalancing local rates. Explain if these services will be the first of their kind in Florida (among all other LEC or carriers in Florida) or explain if these services are already available and provide the locations. Also, explain if these services will be the first of their kind in the region or among the company's operations in other states, or explain if these services are already available by the company in other regions and states and provide these locations.

38. For those states which have reduced access and rebalanced local rates in the past few years such as indicated in Mr. Gordon's testimony (i.e., California, Illinois, Ohio, Massachusetts, Maine and any others), provide a list of services introduced or available in these states that are not available in other states that have not rebalanced local rates (to supposedly eliminate support).

39. Provide an explanation of all increases in residential long distance rates for each service for the period January 2000 to the most recent date. For each service,

provide the prior rate (and the date), the increased rate, (and date of increase) and an explanation of the reason for the increase in long distance rates.

40. Address the following regarding long distance rates:

a) For the company (and/or its long distance affiliate) operations in Florida, provide a comparison and brief description of all current residential long distance calling plans and a comparison of the rates available on an "intrastate" basis and an "interstate" basis. Identify those similar "intrastate" and "interstate" long distance plans, and explain the reason for any difference in rates.

b) Explain if this situation of having different intrastate and interstate rates for similar calling plans is unique to the company's Florida operations, or if it is unique to states which have not rebalanced local rates and provide documentation to support this (such as comparing rates in other states of the company operations, including states which have and have not rebalanced local rates).

c) For the company (and/or its long distance affiliate) operations in Florida, provide the name and a brief description of all current residential long distance calling plans that are available on an "interstate" basis, but not an "intrastate" basis. Explain why this situation exists and provide documentation to support this.



d) Explain if this situation of having certain "interstate" long distance calling plans (but not similar "intrastate" plans) is unique to the company's Florida operations, or if it is unique to states which have not rebalanced local rates and provide documentation to support this (such as comparing rates in other states of the company operations, including states which have and have not rebalanced local rates).

e) For items (a) through (d) above, address these issues as it relates to those states which have rebalanced local rates in the past few years per the testimony of Dr. Gordon (i.e., California, Illinois, Ohio, Massachusetts, Maine and others).

41. Dr. Gordon's testimony addresses a list of states that have rebalanced rates in recent years (i.e., California, Illinois, Ohio, Massachusetts, Maine and others). For these states, provide the following:

a) Provide the amount of the reduction in long distance rates (or average reduction in rates) on a statewide basis by carriers, or provide examples of rate reductions for MTS and calling plans implemented by RBOCs and major IXCs in these states.

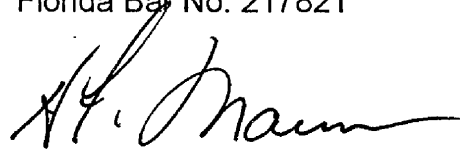
b) Explain if these long distance rate reductions for MTS and other calling plans are still in place for the RBOCs and major IXCs in these states.

c) If the original long distance rate reductions for MTS and other calling plans are not still in place, explain the length of time that these reductions were in place before they were subsequently increased and provide all explanations for reasons for these increases in rates if known.

42. Dr. Gordon's testimony addresses a list of states that have rebalanced rates in recent years (i.e., California, Illinois, Ohio, Massachusetts, Maine and others). For these states, explain if the reduced access and increased local rates has induced an increased competitive response and market entry by the RBOCs and larger LECs in these states. For example, explain if RBOCs have entered the service territories of other incumbent LECs to compete for residential and business customers, and explain if other incumbent LECs have entered the service territories of RBOCs to compete for residential and business customers. Explain this status to the address the level of competition among and between RBOCs and incumbent LECs in these states.

Respectfully Submitted,

CHARLES J. BECK  
Interim Public Counsel  
Florida Bar No. 217821

A handwritten signature in black ink, appearing to read "H. F. Rick Mann". The signature is fluid and cursive, with a long horizontal stroke at the end.

H F. Rick Mann  
Associate Public Counsel  
Florida Bar No. 763225

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

(850) 488-9330

Attorney for Florida's Citizens

DOCKET NO. 030868-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 5th day of September, 2003.



H F. Mann

Beth Keating, Esquire  
Division of Legal Services  
Fla. Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

John P. Fons, Esquire  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302

Tracy Hatch/Chris McDonald  
AT&T Communications  
101 North Monroe, Suite 700  
Tallahassee, FL 32301

Michael A. Gross, Esquire  
Florida Cable Telecomm. Assn.  
246 East 6th Avenue  
Tallahassee, FL 32303

Donna McNulty  
MCI WorldCom, Inc.  
1203 Governors Square Blvd.  
Suite 201  
Tallahassee, FL 32301-2960

Brian Sulmonetti  
MCI WorldCom  
Concourse Corporate Center Six  
Six Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Susan Masterton, Esquire  
Sprint-Florida, Incorporated  
P.O. Box 2214  
Tallahassee, FL 32316

Charles Rehwinkel, Esquire  
Sprint-Florida, Incorporated  
1313 Blair Stone Road  
FLTH00107  
Tallahassee, FL 32301