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October 27, 2003

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



Re: Docket No. 030851-TP & 030852-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and one copy of Sprint's Additional Comments on Issues.

Copies are being served on the parties in this docket via electronic and US mail.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to my assistant. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Enclosure

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Susan S. Masterton

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CERTIFICATE OF SERVICE DOCKET NO. 030851-TP & 030852-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail and by U.S. Mail on this 27th day of October, 2003 to the following:

AT&T

Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

AT&T Communications of the Southern States, LLC Ms. Lisa A. Sapper 1200 Peachtree Street, N.E., Ste. 8100 Atlanta, GA 30309-3579

BellSouth Telecommunications, Inc. R. D. Lackey/M. Mays/N. White/J. Meza c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Covad Communications Company Mr. Charles E. Watkins 1230 Peachtree Street, NE, 19th Floor Altanta, GA 30309-3574

FDN Communications Matthew Feil/Scott Kassman 390 North Orange Avenue, Suite 2000 Orlando, FL 32801-1640 Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

ITC DeltaCom Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802

KMC Telecom III, LLC Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119

McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

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Verizon Florida Inc. Richard Chapkis P.O. Box 110, FLTC0717 Tampa, FL 33601-0110

Florida Public Service Commission Adam Tietzman 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Allegiance Telecom of Florida, Inc. Jeffrey J. Binder 1919 M Street, N.W. Washington, DC 20037

Allegiance Telecom, Inc. Terry Larkin 700 East Butterfield Road Lombard, IL 60148

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

MCI WorldCom Communications, Inc.(GA) De O'Roark, Esq. Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

Xspedius Communications Ms. Rabinai E. Carson 5555 Winghaven Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220

Granite Telecommunications, LLC Rand Currier/Geoff Cookman 234 Copeland Street Quincy, MA 02169-4005

MCI WorldCom Communications, Inc. Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Miller Isar, Inc. Andrew O. Isar 7901 Skansie Avenue, St. 240 Gig Harbor, WA 98335

NewSouth Communications Jake E. Jennings Regulatory Affairs & Carrier Relations Two N. Main Center Greenville, SC 29601

Moyle, Flanigan, Katz Raymond & Sheehan, P.A. Jon C. Moyle, Jr., Esq. The Perkins House 118 N. Gadsen St. Tallahassee, FL 32301

Susan S. Masterton

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Implementation of requirements arising From Federal Communications Commission Triennial UNE review: Local Circuit Switching For Mass Market Customers Docket No. 030851-TP

In re: Implementation of requirements arising From Federal Communications Commission Triennial UNE review: Location Specific-Review For DS1, DS3 and Dark Fiber Loops and Route-Specific Review for DS1, DS3 and Dark Fiber Transport Docket No. 030852-TP

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Filed: October 27, 2003

SPRINT'S ADDITIONAL COMMENTS ON ISSUES

Pursuant to the prehearing officer's direction at the issue identification meeting for these dockets held on October 23, 2003, Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership (collectively, "Sprint") submit these additional comments to address the modified staff issues list for Docket No. 030851-TP distributed by the FCCA at the meeting and to address other outstanding issues raised at the meeting.

 Sprint agrees there is merit to considering the additional issues beyond those proposed by staff issues list that are proposed in the FCCA's modified issues list. However, Sprint suggests that Issue 10 on the FCCA revised list should be modified as follows to more specifically capture the requirements of the Triennial Review Order relating to the scope of the geographic market served.

"Is there evidence that the existence of the three CLEC switches demonstrates adequately the technical and economic feasibility of an entrant serving the mass market with its own switch, as opposed to only serving a niche portion of the mass market with its own switch?" (TRO Order ¶501)

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- 2. Sprint reiterates its position stated in its initial comments on the issues and at the hearing that the loop and transport issues (Docket No. 030852-TP) not be presented ILEC by ILEC as they are in the original staff issues list. Instead, each issue should be stated generically and answered for each ILEC, in the same manner as the staff indicated would apply to the switching issues.
- 3. Sprint does not oppose admission into the record of responses to Commission data requests to nonparties submitted by affidavit, provided that the stipulation does not purport to constitute concurrence with any assumptions that may be drawn from the data responses and provided that parties are given an adequate opportunity to address the information submitted in the data responses in their testimony or otherwise.
- 4. Certain parties and interested persons have suggested that the Florida Commission use the data requests developed by the New York Public Service Commission as a template for the Florida requests. Sprint has reviewed the New York data requests and does not object to their use by the Florida Commission as a basis for the data requests to be sent to nonparties.

Respectfully submitted this 27th day of October 2003.

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ATTORNEY FOR SPRINT