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February 2, 2004

VIA HAND DELIVERY

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

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COMMISSION
CLERK

Re: Docket No. 030852-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Prehearing Statement. We are also submitting the Prehearing Statement on a 3.5" high-density diskette using Microsoft Word 98 format, Rich Text.

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,

[Handwritten signature of J. Jeffrey Wahlen]

J. Jeffrey Wahlen

RECEIVED & FILED
[Handwritten initials]
FPSC-BUREAU OF RECORDS

Enclosures

cc: All Parties of Record

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01480 FEB-2 3

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

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DOCKET NO. 030852-TP  
FILED: February 2, 2004

**SPRINT'S PREHEARING STATEMENT**

Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership (collectively "Sprint" or the "Company"), pursuant to Order No. PSC-03-1265-PCO-TP, submits the following Prehearing Statement:

**A. WITNESS:** Sprint will offer the rebuttal and surrebuttal testimony of Kent W. Dickerson on all issues.

**B. EXHIBITS:** The rebuttal testimony of Kent W. Dickerson included three exhibits, KWD-1, KWD-2 and KWD-3.

**C. BASIC POSITION:**

Under the self-provisioning trigger, the competitive wholesale facilities trigger or the potential deployment trigger, BellSouth and Verizon have failed to provide route and location specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to Dedicated Transport and high capacity loops.

## **D-G. ISSUES AND POSITIONS:**

### **DS-1 Loops** (§ 51.319(a)(4)(ii))

**Issue 1:** To what specific customer locations have two or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, deployed their own DS-1 facilities (including leased, purchased or UNE dark fiber with the carrier's own optronics attached to activate the fiber) and offer DS-1 loops over their own facilities on a widely available basis to other carriers? For each such location, do the wholesale providers have access to the entire customer location, including each individual unit within the location?

**Position:** BellSouth and Verizon have not provided location specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-1 loops. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-1 loop services are available from two or more competing providers to all customers at the claimed trigger location. Therefore, the wholesale trigger has not been satisfied for DS-1 loops

### **DS-3 Loops** (§51.319(a)(5))

**Issue 2:** To what specific customer locations have two or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, either (1) deployed their own DS-3 facilities and actually serve customers via those facilities or (2) deployed DS-3 facilities by attaching their own optronics to activate dark fiber obtained under a long-term indefeasible right of use and actually serve customers via those facilities at that location?

**Position:** BellSouth and Verizon have not provided location specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 loops. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-3 loop facilities have been deployed by two or more

competing providers Therefore, the self-provisioning trigger has not been satisfied for DS-3 loops.

**Issue 3:** To what specific customer locations have two or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, deployed their own DS-3 facilities (including leased, purchased or UNE dark fiber with the carrier's own optronics attached to activate the fiber) and offer DS-3 loops over these facilities on a widely available wholesale basis to other carriers? For each such location, do the wholesale providers have access to the entire customer location, including each individual unit within the location?

**Position:** BellSouth and Verizon have not provided location specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 loops. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-3 loops are available from two or more competing providers to all customers at the claimed trigger location. Therefore, the wholesale trigger has not been satisfied for DS-3 loops.

**Issue 4:** If neither the self-provisioning or the wholesale triggers for DS-3 loops is satisfied at a specific customer location, using the potential deployment criteria specified in §51.319(a)(5)(ii), what evidence of non-impairment for a DS-3 loop at a specific customer location exists? Is this evidence sufficient to conclude that there is no impairment at a specific customer location?

**Position:** BellSouth's potential deployment analysis is fundamentally flawed and does not provide sufficient evidence to conclude that there is not impairment at the locations included in BellSouth's analysis. BellSouth did not provide any supporting documentation, workpapers, calculations or even the basic formulas used to show how the locations allegedly qualify for potential deployment. Furthermore, BellSouth's calculations of potential deployment costs performed by their BellSouth Analysis of Competitive Entry (BACE) model cannot be viewed and are not auditable. BellSouth's

analysis is based on uniform cost and revenue assumptions and fails to meet the FCC's requirement that a potential deployment analysis be completed on a location specific basis. BellSouth overstates the potential revenue available from deployment and makes unfounded and unrealistic generalizations related to the cost of acquiring customers at the locations. Therefore, the BellSouth potential deployment analysis for DS-3 loops should be rejected by the Commission. Verizon did not present a potential deployment analysis so there are no Verizon customer locations which satisfy the FCC's potential deployment criteria.

Dark Fiber Loops (§51.319(a)(6))

**Issue 5:** To what specific customer locations have two or more competing providers deployed their own dark fiber facilities, including dark fiber owned by the carrier or obtained under a long-term indefeasible right of use (but excluding ILEC unbundled dark fiber)?

**Position:** BellSouth and Verizon have not provided location specific data regarding deployment of dark fiber facilities sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market for any customer location. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual dark fiber facilities have been deployed by two or more competing providers. Therefore, the self-provisioning trigger for dark fiber loops has not been satisfied.

**Issue 6:** If the self-provisioning trigger for dark fiber loops is not satisfied at a specific customer location, using the potential deployment criteria specified in §51.319(a)(6)(ii), what evidence of non-impairment for dark fiber loops at a specific customer location exists? Is this evidence sufficient to conclude that there is no impairment at a specific customer location?

**Position:** BellSouth's potential deployment analysis is fundamentally flawed and does not provide sufficient evidence to conclude that there is not impairment at the

locations included in BellSouth's analysis. BellSouth did not provide any supporting documentation, workpapers, calculations or even the basic formulas used to show how the locations allegedly qualify for potential deployment. Furthermore, BellSouth's calculations of potential deployment costs performed by their BellSouth Analysis of Competitive Entry (BACE) model cannot be viewed and are not auditable. BellSouth's analysis is based on uniform cost and revenue assumptions and fails to meet the FCC's requirement that a potential deployment analysis be completed on a location specific basis. BellSouth overstates the potential revenue available from deployment and makes unfounded and unrealistic generalizations related to the cost of acquiring customers at the locations. Therefore, the BellSouth potential deployment analysis for dark fiber loops should be rejected by the Commission. Verizon did not present a potential deployment analysis so there are no Verizon customer locations which satisfy the FCC's potential deployment criteria.

Dedicated DS-1 Transport (§51.319(e)(1)(ii))

**Issue 7: Along what particular routes have two or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, deployed their own DS-1 level dedicated transport facilities (including leased, purchased or UNE dark fiber with the carrier's own optronics attached to activate the fiber) and are willing to provide DS-1 level transport immediately over their own facilities on a widely available basis to other carriers?**

**Position:** BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-1 level transport. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-1 transport services are available from two or more

competing providers who are operationally ready and are providing DS-1 transport. Therefore, the wholesale trigger has not been satisfied for DS-1 level transport.

**Issue 8:** For any particular route where at least two competing providers will provide wholesale DS-1 dedicated transport, do both competing providers' facilities terminate in collocation arrangements at an ILEC premise or a similar arrangement in a non-ILEC premise? If so, can requesting carriers obtain reasonable and nondiscriminatory access to those competing providers' termination points through a cross-connect to the providers' collocations either at the ILEC premise or similar arrangement if located at a non-ILEC premise?

**Position:** See Issue 7. BellSouth and Verizon have not provided route specific data sufficient to show that at least two competing providers are providing DS-1 dedicated transport.

Dedicated DS-3 Transport (§51.319(e)(2))

**Issue 9:** Along what particular routes have three or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, deployed their own DS-3 level dedicated transport facilities (including leased, purchased or UNE dark fiber with the carrier's own optronics attached to activate the fiber) and are operationally ready to use those transport facilities?

**Position:** BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 level dedicated transport facilities. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-3 transport facilities have been deployed by three or more competing providers and that the providers are operationally ready to use such transport facilities. Therefore, the self-provisioning trigger for DS-3 transport has not been satisfied.

**Issue 10:** For any particular route where at least three competing providers have self-provisioned DS-3 level dedicated transport facilities, do the competing

**providers' facilities terminate in collocation arrangements at an ILEC premise or a similar arrangement in a non-ILEC premise?**

**Position:** See Issue No. 9. BellSouth and Verizon have not provided location specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 level dedicated transport facilities.

**Issue 11:** Along what particular routes have two or more competing providers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, deployed their own DS-3 level dedicated transport facilities (including leased, purchased or UNE dark fiber with the carrier's own optronics attached to activate the fiber), are operationally ready to use those transport facilities, and are willing to provide DS-3 level dedicated transport immediately over their facilities on a widely available wholesale basis to other carriers?

**Position:** BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 level dedicated transport facilities. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual DS-3 transport services are available from two or more competing providers and are offered on a widely available wholesale basis to other carriers. Therefore, the wholesale trigger for DS-3 transport has not been satisfied.

**Issue 12:** For any particular route where at least two competing providers will provide wholesale DS-3 level dedicated transport, do both competing providers' facilities terminate in collocation arrangements at an ILEC premise or a similar arrangement in a non-ILEC premise? If so, can requesting carriers obtain reasonable and nondiscriminatory access to those competing providers' termination points through a cross-connect to the providers' collocations either at the ILEC premise or similar arrangement if located at a non-ILEC premise?



**Position:** See Issue 11. BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to DS-3 level dedicated transport facilities.

**Issue 13:** If neither the self-provisioning nor the wholesale triggers for DS-3 level dedicated transport is satisfied along a route, using the potential deployment criteria specified in §51.319(e)(2)(ii), what evidence of non-impairment for DS-3 level dedicated transport on a specific route exists? Is this evidence sufficient to conclude that there is no impairment along this route?

**Position:** BellSouth's potential deployment analysis is fundamentally flawed and does not provide sufficient evidence to conclude that there is not impairment for the transport routes included in BellSouth's analysis. BellSouth did not provide any supporting documentation, workpapers, calculations or even the basic formulas used to show how the routes allegedly qualify for potential deployment. Furthermore, BellSouth's calculations of potential deployment costs performed by their BellSouth Analysis of Competitive Entry (BACE) model cannot be viewed and are not auditable. BellSouth's analysis is based on uniform cost assumptions and fails to meet the FCC's requirement that a potential deployment analysis be completed on a route specific basis. BellSouth has understated the costs of deploying transport routes through use of broad assumptions for fiber cable and construction-related costs. Therefore, the BellSouth potential deployment analysis for transport should be rejected by the Commission. Verizon did not present a potential deployment analysis so there are no Verizon transport routes which satisfy the FCC's potential deployment criteria.

**Dark Fiber Transport (§51.319(e)(3))**

**Issue 14: Along what particular routes have three or more competing providers, not affiliated with each other or the ILEC, deployed their own dark fiber transport facilities?**

**Position:** BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to dark fiber transport. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual dark fiber transport facilities have been deployed by three or more competing providers. Therefore, the self-provisioning trigger for dark fiber transport has not been satisfied.

**Issue 15: For any particular route where at least three competing providers have self-provisioned dark fiber dedicated transport facilities, do the competing providers' facilities terminate in collocation arrangements at an ILEC premise or a similar arrangement in a non-ILEC premise?**

**Position:** See Issue No. 14. BellSouth and Verizon have not provided route specific data sufficient to overturn the Federal Communications Commission's national findings that CLECs are impaired when competing in the local market without unbundled access to dark fiber transport.

**Issue 16: Along what particular routes have two or more competing providers, not affiliated with each other or the ILEC, deployed their own dark fiber transport facilities (including dark fiber obtained from an entity other than the ILEC), are operationally ready to lease or sell those transport facilities to provide transport along the route, and are willing to provide dark fiber immediately over their facilities on a widely available wholesale basis to other carriers?**

**Position:** BellSouth and Verizon have not provided route specific data sufficient to overturn the FCC's national findings that CLECs are impaired when competing in the local market without unbundled access to dark fiber transport. BellSouth and Verizon fail to provide verifiable evidence to satisfy the FCC's trigger requirements that actual dark fiber

transport services are available from two or more competing providers and are offered on a widely available wholesale basis to other carriers. Therefore, the wholesale trigger for dark fiber transport has not been satisfied.

**Issue 17:** For any particular route where at least two competing providers will provide wholesale dark fiber, do both competing providers' facilities terminate in collocation arrangements at an ILEC premise or a similar arrangement in a non-ILEC premise? If so, can requesting carriers obtain reasonable and nondiscriminatory access to those competing providers' termination points through a cross-connect to the providers' collocations either at the ILEC premise or similar arrangement if located at a non-ILEC premise?

**Position:** See Issue No. 16. BellSouth and Verizon have not provided route specific data sufficient to show that the wholesale trigger has been satisfied for dark fiber transport.

**Issue 18:** For any particular route where at least two competing providers will provide such wholesale dark fiber, do these providers have sufficient quantities of dark fiber available to satisfy current demand along that route? If not, should the wholesale trigger for dark fiber be determined to be satisfied along that route?

**Position:** See Issue No. 16. BellSouth and Verizon have not provided route specific data sufficient to show that the wholesale trigger has been satisfied for dark fiber transport.

**Issue 19:** If neither the self-provisioning or the wholesale triggers for dark fiber transport is satisfied along a route, using the potential deployment criteria specified in §51.319(e)(3)(ii), what evidence of non-impairment for dark fiber on a specific route exists? Is this evidence sufficient to conclude that there is no impairment along this route?

**Position:** BellSouth's potential deployment analysis is fundamentally flawed and does not provide sufficient evidence to conclude that there is not impairment for the transport routes included in BellSouth's analysis. BellSouth did not provide any supporting documentation, workpapers, calculations or even the basic formulas used to show how the routes allegedly qualify for potential deployment. Furthermore, BellSouth's calculations of potential deployment costs performed by their BellSouth

Analysis of Competitive Entry (BACE) model cannot be viewed and are not auditable. BellSouth's analysis is based on uniform cost assumptions and fails to meet the FCC's requirement that a potential deployment analysis be completed on a route specific basis. BellSouth has understated the costs of deploying transport routes through use of broad assumptions for fiber cable and construction-related costs. Therefore, the BellSouth potential deployment analysis for transport should be rejected by the Commission. Verizon did not present a potential deployment analysis so there are no Verizon transport routes which satisfy the FCC's potential deployment criteria.

**Issue 20:** If unbundling requirements for loops at customer-specific locations or dedicated transport along a specific route are eliminated, what are the appropriate transition period and requirements, if any, after which a CLEC no longer is entitled to these loops or transport under Section 251(c)(3)?

**Position:** No position at this time.

H. **STIPULATIONS:** The Company is not aware of any pending stipulations at this time.

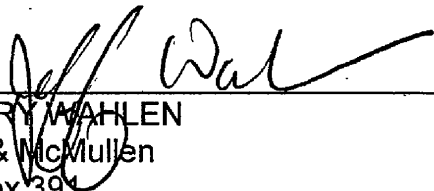
I. **PENDING MOTIONS:** Except for its Motion to Compel, the Company is not aware of any pending motions at this time.

J. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** The Company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

K. **PENDING DECISIONS:** Except for the various appeals of the TRO itself, which are now pending in federal court, the Company is not aware of any pending decisions.

L. **OBJECTIONS TO WITNESS' QUALIFICATIONS:** The Company has no objections to a witness' qualifications as an expert.

DATED this 2nd day of February, 2004.



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and SPRINT COMMUNICATIONS COMPANY  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (\*) this 2nd day of February, 2004, to the following:

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Attorney

