



3065 Cumberland Circle
Atlanta, GA 30339-3166

June 28, 1993

VIA AIRBORNE

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Fletcher Building
Tallahassee, Florida 32399-0850

RE: Petition of Intermedia Communications of Florida, Inc.
for Expanded Interconnection for AAVs Within LEC Central
Offices - 931074-TP

Dear Mr. Tribble:

Per your memorandum of June 24, 1993 concerning the Commission rules for left-handed margins to allow for binding, please find enclosed for filing in the above-referenced docket on behalf of Sprint Communications Company Limited Partnership the original and fifteen (15) copies of Sprint's Testimony in the above-referenced matter. Please return a file-stamped copy in the enclosed self-addressed stamped envelope.

Thank you.

Sincerely,

Chanthina R. Bryant
Chanthina R. Bryant (4)
Attorney, State Regulatory

ACK _____

AFA 1

APP _____

CAF _____

CMU _____

CTR _____ CRB:lj

EAG _____

LEG 1 Enclosure

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OPC cc: All Parties of Record

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3065 Cumberland Circle
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June 23, 1993

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Attorney, State Regulatory

CRB:lj

Enclosure

cc: All Parties of Record

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A handwritten signature in cursive script that reads "Chanthina R. Bryant".

Chanthina R. Bryant
Attorney, State Regulatory

CRB:lj

Enclosure

cc: All Parties of Record

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06837 JUN 24 83

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Chanthina R. Bryant
Chanthina R. Bryant (4)
Attorney, State Regulatory

CRB:lj

Enclosure

cc: All Parties of Record

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

TESTIMONY OF FRED I. ROCK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 921074-TP

JUNE 23, 1993

1 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.

2 A. My name is Fred I. Rock and my business address is 7171
3 W. 95th Street, Overland Park, KS 66212. I am employed
4 by Sprint Communications Limited Partnership ("Sprint")
5 as Manager - Regulatory Access Planning.

6

7 Q. WILL YOU BRIEFLY STATE YOUR EDUCATIONAL BACKGROUND?

8 A. I received a Masters in Business Administration from
9 Rockhurst College, Kansas City, Missouri in 1993 and a
10 Bachelor of Science Degree in Accounting from Kansas
11 State University in 1983. I am a Certified Public
12 Accountant in the State of Kansas.

13

14 Q. PLEASE STATE YOUR PREVIOUS WORK EXPERIENCE IN
15 TELECOMMUNICATIONS.

16 A. I began working for the Sprint Long Distance Division in
17 July, 1992 where I have the responsibility of monitoring
18 state and federal regulatory activity relating to access
19 services in the BellSouth region. Prior to my current
20 position, I was employed by United Telephone - Midwest
21 for four years. At United, my responsibilities included

1 revenue budgets, financial analysis, and service costing
2 and pricing.

3

4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5 A. The purpose of my testimony is to address issues relating
6 to expanded interconnection in Florida. The Florida
7 Public Service Commission ("Commission") has the
8 opportunity to take important steps towards the
9 development of a more competitive local access market and
10 more rational pricing of Local Exchange Company ("LEC")
11 special access services by adopting a policy requiring
12 expanded interconnection for special access. At the same
13 time, this Commission can establish the framework for
14 switched access interconnection in Florida.

15

16 Q. IS EXPANDED INTERCONNECTION FOR SPECIAL ACCESS AND/OR
17 PRIVATE LINE IN THE PUBLIC INTEREST?

18 A. Yes, expanded interconnection policy is designed to
19 encourage competitive entry in the provision of access
20 service, which today is almost exclusively provided by
21 local exchange companies. With competitive entry come
22 the benefits of product innovation, higher quality
23 service, network diversity and lower prices. These
24 long-term advantages would be realized by both the
25 end-user and the telecommunications industry in Florida
26 and all other states and is therefore in the public
27 interest.

1 Without an intrastate expanded interconnection offering
2 in Florida that corresponds to interconnection ordered by
3 the Federal Communications Commission ("FCC") in Docket
4 91-141, this Commission would be ignoring an important
5 intrastate revenue stream for the LECs and would only be
6 delaying the inevitable transformation of the access
7 marketplace from monopoly to competition.

8
9 Q. HOW DOES THE FCC'S ORDER ON EXPANDED INTERCONNECTION
10 IMPACT THE COMMISSION'S ABILITY TO IMPOSE FORMS AND
11 CONDITIONS OF EXPANDED INTERCONNECTION THAT ARE DIFFERENT
12 FROM THOSE IMPOSED BY THE FCC'S ORDER?

13 A. Sprint believes the best alternative for the Florida
14 Commission is to structure its policy on expanded
15 interconnection for special access based on the framework
16 established by the FCC. The standards for equipment,
17 technologies, interconnection points, entry points and
18 rate structure ultimately set by the FCC should be
19 considered the basis for the interconnection policy
20 adopted in Florida. However, the Commission is not
21 obligated to adopt the FCC requirements in all aspects.

22
23 Q. UNDER WHAT CIRCUMSTANCES SHOULD THE COMMISSION IMPOSE
24 DIFFERENT FORMS AND CONDITIONS OF EXPANDED
25 INTERCONNECTION?

26

1 A. Any enhancements to the policy set by the FCC should
2 ensure further promotion of the benefits of expanded
3 interconnection, i.e., diversity, lower prices,
4 innovation, etc. A Florida specific enhancement to the
5 FCC Order in Docket 91-141 as released on October 19,
6 1992, should require LECs to originate and terminate
7 switched traffic at interconnector collocation sites
8 established under the special access interconnection
9 offerings. This would allow the shared and efficient use
10 of collocation facilities. This does not constitute
11 switched interconnection. Under such a dual use of
12 special collocation sites, an interconnector would still
13 be required to purchase LEC provided local transport for
14 switched access service (until switched interconnection
15 is permitted), as is required today.

16
17 This approach makes much more sense than restricting the
18 special interconnection site to special circuits and
19 interconnectors could derive greater trunking
20 efficiencies through aggregation. The purpose of
21 competitive access entry is to encourage innovation,
22 lower costs and higher quality service. Such entry will
23 be limited, however, if entrants are automatically
24 excluded from 70 or 80 percent of access traffic, as they
25 would be under a non-dual use standard. Sprint's
26 recommendation overcomes this problem.

1 If dual use is not permitted under special access
2 interconnection, Competitive Access Providers ("CAPs")
3 and more likely CAP customers, will be forced to
4 inefficiently reconfigure networks to serve their special
5 access needs separately from their switched access needs.
6 This would represent a poor use of resources, especially,
7 given that LECs today operate a shared switched and
8 special access network, primarily because it is more
9 efficient to do so. Also, attempting to nurture
10 competition while simultaneously prohibiting development
11 of an efficient shared use network is perverse from a
12 public policy standpoint because the point of promoting
13 interconnection is to encourage competitive entry.
14 Precluding entry to a large segment of the market is
15 counter-productive.

16
17 Finally, from a LEC revenue management standpoint,
18 permitting dual use of special collocation sites has no
19 impact on LEC revenue flows in Florida since LEC local
20 transport revenue is recovered via a fixed non distance
21 sensitive per minute of use ("MOU") charge.

22
23 Q. SHOULD THE COMMISSION REQUIRE PHYSICAL AND/OR VIRTUAL
24 COLLOCATION?

25 A. The Florida Public Service Commission should mirror the
26 interstate requirements regarding collocation

1 arrangements. In FCC Docket 91-141, the FCC Ordered LECs
2 to provide physical collocation arrangements, with
3 exemptions for lack of central office space, negotiated
4 virtual arrangements or in cases where a state has
5 established a virtual collocation requirement.
6 Technologically, Sprint believes that the same
7 interconnection opportunities can be made available on a
8 virtual basis as on a physical basis. Sprint believes
9 there is minimal cost difference between provisioning for
10 physical and virtual arrangements. As long as LECs offer
11 "virtual" interconnectors the same level of service as if
12 they were located in the central office, and provide a
13 virtual arrangement at the same price for common rate
14 elements, Sprint does not believe the requirement of
15 physical interconnection is necessary. However, the FCC
16 has established a policy for physical collocation and
17 this requirement would have to apply to any arrangement
18 providing both interstate and intrastate interconnection
19 that is not covered by an exemption.

20

21 Q. WHAT LECs, IF ANY, SHOULD BE REQUIRED TO PROVIDE EXPANDED
22 INTERCONNECTION?

23 A. The Florida PSC should adopt the same requirements as the
24 FCC established. The FCC, in its Order in Docket 91-141,
25 has required all Tier 1 LECs to file expanded
26 interconnection tariffs for the provisioning of special

1 access.

2

3 Q. WHERE SHOULD EXPANDED INTERCONNECTION BE OFFERED?

4 A. Sprint supports the application of competition-based
5 requirements in locations most likely to experience
6 competitive entry. Specifically, expanded
7 interconnection should be required where interconnectors
8 have indicated a desire to collocate (as determined in
9 FCC Docket 91-141). Tier 1 LECs control the major
10 metropolitan areas in Florida which are most likely to
11 warrant and benefit from competition. While the
12 Commission should nurture the competitive process, the
13 decision of where an interconnector wants to collocate
14 must be left up to the interconnector. Therefore, LECs
15 should be required to set rates for any subsequent bona
16 fide request in a reasonable period of time. Limiting
17 interconnection to specific central offices would enable
18 the LEC to determine where competitive entry is feasible.

19

20 Q. WHO SHOULD BE ALLOWED TO INTERCONNECT?

21 A. Expanded interconnection should be available to any party
22 meeting the applicable standards that desires locating
23 its transmission and multiplexing facilities at a LEC
24 central office. In addition, LECs and other
25 interconnectors should have the right to interconnect
26 with an interconnector.

1 Q. SHOULD THE SAME TERMS AND CONDITIONS OF EXPANDED
2 INTERCONNECTION APPLY TO AT&T AS APPLY TO OTHER
3 INTERCONNECTORS?

4 A. Yes, Sprint agrees with the FCC that any party currently
5 located at a LEC central office must interconnect "in
6 the same manner as other interconnectors", "using fiber
7 optic facilities" and "under the same general terms and
8 conditions".

9

10 Q. SHOULD THE COMMISSION REQUIRE STANDARDS FOR PHYSICAL
11 AND/OR VIRTUAL COLLOCATION? IF SO, WHAT SHOULD THEY BE?

12 A. Yes. As I have stated above, the Florida PSC should
13 mirror the FCC policy of physical collocation with its
14 exemptions. Virtual collocation should be required when
15 physical space becomes exhausted. In addition, LECs
16 should be required to establish interconnection points as
17 close to the central office as possible, provide multiple
18 points of entry into the central office, and allow
19 shared use of an interconnection point for both special
20 access termination and switched transport termination as
21 explained in response to Issue No. 3.

22

23 Q. SHOULD COLLOCATORS BE REQUIRED TO ALLOW LECs AND OTHER
24 PARTIES TO INTERCONNECT WITH THEIR NETWORKS?

25 A. Yes, as I have stated, interconnectors should be required
26 to offer interconnection at its point of collocation.

1 Q. WHAT STANDARDS SHOULD BE ESTABLISHED FOR THE LECs TO
2 ALLOCATE SPACE FOR COLLOCATORS?

3 A. Space should be allocated on a first-come first-served
4 basis. If central office space is exhausted, the LEC
5 should be required to offer a virtual arrangement
6 equitable to physical.

7

8 Q. SHOULD THE COMMISSION ALLOW EXPANDED INTERCONNECTION FOR
9 NON-FIBER OPTIC TECHNOLOGY?

10 A. Expanded interconnection for non-fiber technologies
11 should be limited to microwave transmission.

12

13 Q. IF THE COMMISSION PERMITS EXPANDED INTERCONNECTION, WHAT
14 PRICING FLEXIBILITY SHOULD THE LECs BE GRANTED FOR
15 SPECIAL ACCESS AND PRIVATE LINE SERVICES?

16 A. With the following modifications, the Florida PSC should
17 adopt density zone pricing. There is no doubt that LECs
18 should have a certain degree of pricing flexibility in
19 relation to expanded interconnection for special and
20 switched access. The FCC has adopted density zone
21 pricing for special access where competition exists as
22 evidenced by an operational special access
23 interconnection. Upon availability of switched
24 interconnection, a similar density zone pricing system
25 can be adopted for switched services as well. This
26 pricing methodology would allow LECs to be competitive in

1 the pricing of their special access services, while
2 limiting uneconomic interconnection.

3

4 Q. DOES SPRINT SUPPORT THE FCC'S ADOPTION OF DENSITY ZONE
5 PRICING?

6 A. While Sprint generally supports the FCC's adoption of
7 density zone pricing, Sprint believes the FCC has been
8 overly restrictive in allowing LECs to initiate a zone
9 pricing system in a study area only after expanded
10 interconnection offerings are operational in that study
11 area. Density-based pricing should facilitate fair
12 competition between the LECs and interconnectors after
13 competitive entry has occurred. Additionally, it is even
14 more important that the LECs' access prices reflect their
15 underlying costs so that interconnectors can determine
16 whether or not entry would be economic to begin with and
17 allow interexchange carriers ("IXCs") to fully assess the
18 pricing that will be available from LECs as IXCs review
19 their existing access arrangements thereby utilizing the
20 benefits of access competition. Furthermore, allowing
21 the local exchange industry to price by density zones,
22 whether or not competitive entry and expanded local
23 interconnection has occurred in any study area, will send
24 the correct economic signals more promptly and should
25 facilitate sound entry decisions from the competitive
26 access industry.

1 A second modification to the FCC's density zone pricing
2 plan that Sprint suggests the Commission adopt is that
3 LECs be permitted to propose different initial rates in
4 each density zone. It is beyond dispute that the true
5 economic cost of providing service in the interoffice
6 portion of the local exchange carriers' networks varies
7 much more substantially than adoption of the FCC's
8 density plan which would require equal initial rates in
9 each zone and that these prices can vary thereafter only
10 by +5/-10% annually. (The pricing rules are further
11 constrained by other FCC price cap pricing rules.) If
12 LECs' density-based rates are unduly constrained, their
13 prices will convey improper economic signals to potential
14 competitive entrants and will hinder the IXCs' ability to
15 engage in sound, long-run access planning.

16
17 In the absence of the ability to price their services on
18 the basis of underlying costs, particularly in areas
19 where competition is most likely to occur, the LECs will
20 have an incentive to engage in other forms of pricing,
21 such as uneconomic volume discounts or deep discounts for
22 long-term commitments, that are, in effect, "second-best"
23 substitutes for density-deaveraged prices. Since
24 transmission costs in the LECs' interoffice networks are
25 driven by the total volume of traffic carried on those
26 networks, rather than the volume carried for any

1 particular customer, volume discounts and term discounts
2 can produce perverse effects on both local competition
3 and interexchange competition, and will tend to favor the
4 largest IXC at the expense of small and medium-sized IXCs
5 and other special access customers.

6
7 Q. IF THE COMMISSION PERMITS COLLOCATION, WHAT RATES, TERMS
8 AND CONDITIONS SHOULD BE TARIFFED BY THE LEC?

9 A. The Florida Commission should establish a policy that
10 expanded interconnection offerings and central office
11 space usage will be tarified. The main reason for
12 establishing this requirement is the potential for
13 anticompetitive pricing and discrimination on the part of
14 the LECs. Given the level of control in the hands of the
15 LECs, it is appropriate that interconnection and central
16 office space offerings must be tarified. Sprint believes
17 the framework of terms, conditions, and rates approved by
18 the FCC should be adopted by this Commission. However,
19 the Florida Commission should review rate elements and
20 levels for reasonableness. If the Commission believes a
21 rate element is unwarranted or that a rate is excessive,
22 it should use its authority to change the rate
23 application for the intrastate portion of the service.
24 It is in the best interest of competitive entry, and
25 therefore the end-user, that terms, conditions and rates
26 are reasonable and are similar to those incurred by the

1 LEC and included in the pricing of its access services.

2

3 Q. SHOULD ALL SPECIAL ACCESS AND PRIVATE LINE PROVIDERS BE
4 REQUIRED TO FILE TARIFFS?

5 A. Yes, but only because non-dominant carriers are currently
6 required to file tariffs in Florida. Given that non-
7 dominant carriers may be interconnectors and required to
8 file tariffs, all interconnectors must be required to
9 file tariffs to prevent discrimination. Generally,
10 Sprint believes a non-dominant carrier has a limited
11 ability to effect the market with its pricing and
12 certainly has limited ability to price discriminately.
13 Therefore, rules requiring price lists would normally be
14 sufficient.

15

16 The LEC offering of special access expanded
17 interconnection does not translate into special access
18 competition. Special access competition exists only
19 where there is more than one provider of special access
20 service in a particular central office. Competition is
21 then confined only to that location, not to all LEC
22 provided special access. Therefore, LECs should continue
23 offering special access as a tariffed service, presumably
24 under a system of density zone pricing as previously
25 defined.

26

1 Q. WHAT SEPARATIONS IMPACT WILL EXPANDED INTERCONNECTION
2 HAVE ON THE LECs?

3 A. Sprint believes the overall effect of expanded
4 interconnection and competition in general will be a more
5 efficient local exchange carrier, lower prices, higher
6 quality and benefits to the end-user. While traditional
7 cost separations tend to force costs to follow revenues,
8 competition, with safeguards against cross-subsidization,
9 will require LECs to cut unnecessary expenditures,
10 increase productivity and make decisions that face other
11 firms in competitive industries rather than merely
12 shifting costs from one jurisdiction to another and from
13 one service to another. The LECs must be encouraged to
14 react to the current environment with actions that will
15 allow them to be quality, low cost providers of
16 telecommunications services. Therefore, any effect on
17 LEC costs should be to reduce the overall cost level and
18 thereby benefiting consumers, other LEC customers and LEC
19 shareholders.

20

21 To the extent the LEC is unable to cover "lost
22 contribution" from reduced special access demand through
23 productivity gains, the Commission must look at the
24 current overall rate levels. Indeed, LECs in Florida
25 have among the highest intrastate switched access rates
26 in the United States. Given the fact that switched

1 access currently contributes greatly to subsidized basic
2 local rates, Sprint believes any LEC revenue shortfall
3 should be recovered in local rates.

4

5 Q. HOW WOULD RATEPAYERS BE FINANCIALLY AFFECTED BY EXPANDED
6 INTERCONNECTION?

7 A. As I explained above, expanded interconnection and
8 competition in general will stimulate the efficient
9 provision of all telecommunications services. Ratepayers
10 may need to bear more of the costs attributable to
11 providing local service but only to a point short of
12 impacting universal service. Sprint supports targeted
13 assistance to ratepayers in need and is willing to
14 contribute a fair share to provide such assistance.
15 Across the board subsidization of local rates is
16 unwarranted.

17

18 Q. SHOULD THE COMMISSION GRANT ICI'S PETITION?

19 A. Yes. The Florida Commission should allow ICI to
20 interconnect under the terms and conditions for expanded
21 interconnection as developed in this proceeding.

22

23 Q. SHOULD EXPANDED INTERCONNECTION BE SUBJECT TO A "NET
24 REVENUE TEST" REQUIREMENT IN ORDER TO AVOID POSSIBLE
25 CROSS-SUBSIDY CONCERNS?

26

1 A. No. It is hard to imagine that LECs will price expanded
2 interconnection below cost since the result is to allow
3 competition for its access services. (This assumption
4 has been validated by the LECs with excessive rates filed
5 in their interstate collocation tariffs.)

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8 A. Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and foregoing Testimony in Docket No. 921074-TP; "PETITION OF INTERMEDIA OF FLORIDA, INC. FOR EXPANDED INTERCONNECTION FOR AAVs WITHIN LEC CENTRAL OFFICES" via first class mail, by depositing same with sufficient postage and properly affixed and properly addressed to:

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This 28th day of June, 1993.

SPRINT COMMUNICATIONS COMPANY LIMITED
PARTNERSHIP

BY: Chanthina R. Bryant
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Attorney, State Regulatory