

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of petition(s) to establish)
nondiscriminatory rates, terms, and conditions) DOCKET NO. 950984-TP
for resale involving local exchange)
companies and alternative local exchange) Filed January 29, 1996
companies pursuant to Section 364.161, F.S.)

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POST-HEARING BRIEF OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel and pursuant to Commission Rule 25-22.056(3)(a), Florida Administrative Code, files its post-hearing brief of the evidence in the above referenced proceeding.

Issue 1: What elements should be made available by BellSouth to MCImetro and MFS on an unbundled basis (e.g. link elements, port elements, loop concentration, loop transport)?

ARGUMENT

The most vital component of true local competition will be the unbundling of elements constituting the bottleneck facilities of incumbent LECs. If the elements of LEC bottleneck facilities, especially the local loop, are not unbundled properly, the benefits of competition, to the extent competition develops, may very well be limited to large urban areas, thereby excluding a large segment of Florida customers. The fact is that BellSouth has constructed and deployed virtually ubiquitous loop networks that provide access to all interexchange carriers in practically all residential and business locations in its service area. Accordingly, the ability of new entrants to obtain access to this ubiquitous network is absolutely essential if competition is to exist. (Devine-MFS; Tr. page 66)

Sprint believes that BellSouth should make available unbundled loops and associated transport, unbundled ports, channel multiplexing and associated transport, and virtual collocation. Unbundling will permit new entrants to immediately provide a

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competitive local service without incurring the time and expense of building out and deploying a duplicate LEC network. Therefore, if there is to be true competition in the local telephone market in Florida, incumbent local exchange carriers must unbundle all local network elements at logical and technically feasible points. In other words, LECs must unbundle their existing networks to permit purchase of basic network functions at essentially the same points in their network where they effectively interconnect with themselves. AT&T has identified some eleven basic network functions that is believed can be practically and usefully unbundled today. (Guedel-AT&T; Tr. pages 219-220)

Moreover, MCImetro witness Price defined unbundled loops as certain network elements that provide a connection between an end user's premises and the local exchange carrier's central office. These network elements cannot, today, be purchased individually. Instead, new entrants would be forced to purchase other network elements that are not needed or desired in order to obtain the required loop elements. (Price-MCImetro; Tr. page 117) Therefore, in determining which elements should be made available for resale by BellSouth, and how such unbundling will occur, the Commission should be mindful of the fact that if BellSouth is permitted to impose conditions such that the purchase of unnecessary network elements is required, the public interest would not be served.

Issue 2: What are the appropriate technical arrangements for the provision of such unbundled elements?

Sprint has no argument beyond that contained in its Post-Hearing Statement of Issues and Positions.

Issue 3: What are the appropriate financial arrangements for each such unbundled element.


Sprint has no argument beyond that contained in its Post-Hearing Statement of Issues and Positions.

Issue 4: What arrangements, if any, are necessary to address other operational issues?

Sprint has no position at this time.

Respectfully submitted,

Sprint Communications Company Limited Partnership

By:  _____

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