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September 20, 1996

VIA HAND DELIVERY

Honorable Blanca S. Bayo  
Director - Records and Reporting  
Florida Public Service Commission  
Room 110  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

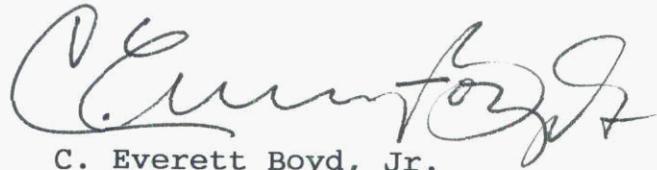
RE: Docket No. 920260-TL

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen (15) copies of the Prehearing Statement of Sprint Communications Company Limited Partnership, copies of which were served today on the parties of record.

Should you have any questions, please give me a call.

Sincerely,



C. Everett Boyd, Jr.

ACK   
AFA 1 CEBJr/bc  
APP \_\_\_\_\_ Enclosures  
CAF \_\_\_\_\_ cc: All Parties of Record

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DOCUMENT NUMBER-DATE

10044 SEP 20 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|                                     |   |                           |
|-------------------------------------|---|---------------------------|
| In re: Comprehensive Review of      | ) | Docket No. 920260-TL      |
| the Revenue Requirements and Rate   | ) |                           |
| Stabilization Plan of Southern Bell | ) | Filed: September 20, 1996 |
| Telephone and Telegraph Company     | ) |                           |

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**PREHEARING STATEMENT OF  
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

COMES NOW, Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel, and, in compliance with the Commission's procedural orders, herewith submits its Prehearing Statement.

**A. Witnesses**

Sprint intends to call Daniel S. Vanderpool as a witness. Sprint reserves the right to call additional witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony, and witnesses to address issues not presently designated which may be designated by the Prehearing Officer at the prehearing conference held on September 30, 1996.

**B. Exhibits**

Sprint at this time does not intend to present any exhibits, but reserves the right to offer exhibits for purposes of impeachment and in other circumstances outlined in paragraph A above.

**C. Statement of Basic Position**

The Commission should adopt the Joint Proposal of FIXCA, AT&T, MCI, Sprint and AT&T Wireless ("Joint Proposal") to implement the \$48 million rate reduction approved by the Commission in Order No. PSC-94-0172-FOF-TL. The rate reductions should be accomplished by elimination of the RIC from access charges, and by reductions in

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FPSC-RECORDS/REPORTING

PBX trunk rates, DID service rates and mobile interconnection rates as specified in the Joint Proposal. BellSouth's proposal to target reductions in services where competition is anticipated should be rejected.

**D. Issues and Positions**

**ISSUE 1.** Below are listed the proposals of various interested parties to this proceeding with respect to the disposition of the scheduled 1996 unspecified rate reductions. Which, if any, should be approved?

|  |                        |
|--|------------------------|
| <b>A) BellSouth Telecommunications, Inc.:</b>                                | <b><u>millions</u></b> |
| 1) Reduce switched access (introduce zone density)                           | \$16.40                |
| 2) Reduce PBX rates and introduce term contracts                             | 13.45                  |
| 3) Waive certain business and residential<br>Secondary Service Order charges | 5.81                   |
| 4) Reduce First Line Connection charges (Business)                           | 3.22                   |
| 5) Introduce Area Plus for Business  | 2.25                   |
| 6) Eliminate usage charge on Remote Call Forwarding                          | 2.01                   |
| 7) Reduce DID recurring and non-recurring charges                            | 1.88                   |
| 8) Credit for ECS routes implemented   | 1.10                   |
| 9) Reduce Business Line monthly rates<br>in Rate Group 12                    | .62                    |
| 10) Reduce Megalink interoffice rates  | .58                    |
| 11) Reduce WATS and 800 Service access line charges                          | .36                    |
| 12) Eliminate the Secondary Service Order charge<br>for WatsSaver            | .30                    |
| 13) Reduce SNAC charges for Business   | .07                    |
| 14) Reduce DS-1 interoffice mileage rates                                    | <u>\$.04</u>           |
|  | <b>\$48.09</b>         |

|  |                        |
|--|------------------------|
| <b>B) Joint Proposal of ATT, MCI, Sprint Communications, FIXCA, Ad Hoc and McCaw Communications:</b> | <b><u>millions</u></b> |
| 1) Reduce PBX and DID trunk charges  | \$11.00                |
| 2) Eliminate the Residual Interconnection Charge   | 35.00                  |
| 3) Reduce mobile interconnection rates   | <u>2.00</u>            |
|  | <b>\$48.00</b>         |

**C) Public Counsel:**  
Establish a reserve fund to assist BellSouth Telecommunications, Inc., customers who have experienced problems with conversion to the 954 NPA.

- D) **FCTA:**  
Eliminate nonrecurring charges for interconnection trunks and special access circuits ordered by ALECs.
- E) **Palm Beach Newspapers, Inc./Florida Today:**  
Reduce usage rates for N11 service to \$.02 per minute.

**SPRINT'S POSITION:** The three components of the Joint Proposal should be approved.

(1) The "make-whole" RIC rate element implemented under rate of return regulation should be eliminated.

(2) Reduction of PBX and DID rates will help to achieve consistency between functionally equivalent services, particularly with BellSouth's ESSX service.

(3) Reduction in mobile interconnection rates will achieve reasonable parity between IXC access charges and rates paid by mobile service providers.

**ISSUE 2:** To the extent the Commission does not approve the plans proposed by BellSouth, Public Counsel, FCTA, Palm Beach Newspapers, Inc./Florida Today and AT&T, MCI, Sprint, FIXCA, Ad Hoc and McCaw, how should the Commission implement the scheduled rate reduction?

**SPRINT'S POSITION:** The Joint Proposal should be adopted. No alternative plan is necessary.

**ISSUE 3:** What should be the effective dates of the approved tariffs?

**SPRINT'S POSITION:** The rates approved by the Commission to implement the \$48 million reduction should be effective 30 days from the Commission's final order in the docket.

#### **E. Stipulations**

There have been no stipulations entered into at the this time.

**F. Pending Motions**

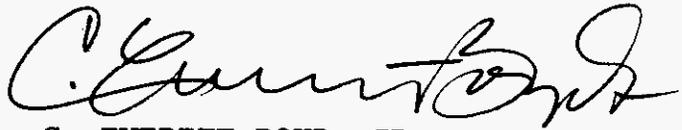
Sprint has no motions pending at this time.

**G. Other Requirements**

Sprint knows of no requirements Set forth in any prehearing orders with which it cannot comply.

DATED this 20<sup>th</sup> day of September, 1996.

Respectfully submitted,



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Attorneys for Sprint Communica-  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail, on the 20th day of September, 1996, to the following:

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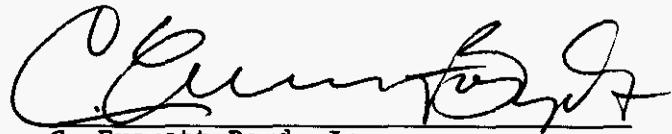
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