

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Sprint Communications Company Limited Partnership for Arbitration of Proposed Interconnection Agreement with BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996

Docket No. 961150-TP
Filed: November 21, 1996

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S
NOTICE OF ADOPTION OF DIRECT TESTIMONY OF
TONY H. KEY BY MICHAEL R. HUNSUCKER

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel, gives notice that witness Michael R. Hunsucker will adopt the prefiled direct testimony of Tony H. Key submitted by Sprint in this docket. Attached to this notice are substitute pages 1, 2 and 3 of the direct testimony to make the direct testimony that of Mr. Hunsucker.

DATED this 21ST day of November, 1996.

Respectfully submitted,



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CERTIFICATE OF SERVICE

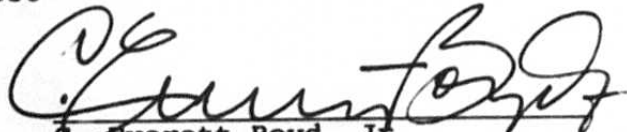
I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery ~~and Federal Express~~ on this 21st day of November 1996, to the following:

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Direct Testimony of Michael R. Hunsucker

on Behalf of

**Sprint Communications Company
Limited Partnership**

1 Q. Please state your full name, title, employer and business address.

2 A. My name is Michael R. Hunsucker. I am employed by Sprint/United Management Company as
3 Director - Pricing and Tariffs. My business address is 2330 Shawnee Mission Parkway,
4 Westwood, Kansas 66215.

5
6 Q. Please describe your educational background, work experience and present
7 responsibilities.

8 A. I received a Bachelor of Science degree in Economics and Business Administration from King
9 College in 1979.

10 I began my career with Sprint in 1979 as Staff Forecaster for Sprint/United Telephone -
11 Southeast Group in Bristol, Tennessee, and was responsible for the preparation and analyzation
12 of access line and minutes of use forecasts. While at Southeast Group, I held various positions
13 through 1985 primarily responsible for the preparation and analyzation of Part 69 allocations
14 including system support to the 17 states in which Sprint/United Telephone - Southeast Group
15 and assumed the position of Separations Supervisor with responsibilities to direct all activities
16 associated with jurisdictional allocations of costs as prescribed by the FCC under Parts 36 and 69.
17 In 1988 and 1991 respectively, I assumed the positions of Manager - Access and Toll Services,
18 and General Manager - Access Services and Jurisdictional Costs responsible for directing all
19 regulatory activities associated with interstate and intrastate access and toll services and the
20 development of Part 36/69 cost studies including the provision of expert testimony as required.
21 In my current position, Director - Pricing and Tariffs, for Sprint/United Management Company, I
22 am responsible for the development and promotion of regulatory policy for the Sprint local
23 exchange companies and for the coordination of regulatory policies with other Sprint business
24 units.

25

1 Q. **Have you testified previously before state regulatory commissions?**

2 A. I have testified before the South Carolina Public Service Commission and the Pennsylvania Public
3 Utility Company.

4 Q. **What is the purpose and scope of your testimony?**

5

6 A. I am presenting testimony in support of Sprint Communications Company Limited Partnership's
7 ("Sprint") request for arbitration of proposed interconnection agreement with GTE Florida
8 Incorporated ("GTE"). The Telecommunications Act of 1996 ("the Act") directs companies like
9 Sprint that desire to enter the local exchange service market as new entrants - so called
10 competitive local exchange companies ("CLECs") - to undertake contract negotiations with
11 incumbent local exchange companies ("ILECs"). If the CLEC and ILEC are not successful in
12 concluding contract negotiations under Sections 251 and 252 of the Act, either party may
13 exercise its right to request arbitration by the state regulatory body that regulates
14 telecommunications.

15 Sprint has undertaken negotiations pursuant to Sections 251 and 252 of the Act. Sprint and GTE
16 have failed to reach agreement on several crucial contract requirements. Sprint is thus exercising
17 its rights under the Act and is seeking arbitration of the contract negotiation disputes that
18 remain between the parties.

19 My testimony covers general policy matters, the need for operational parity between GTE and
20 Sprint, and most favored nation rights to rates, terms and conditions contained in any GTE
21 contract or tariff, branding issues, network interconnection, access to unbundled network
22 elements, and electronic system interface requirements between Sprint and GTE. David Stahly
23 also presents testimony concerning cost and price issues and requirements.

24 Q. **Has Sprint attempted to negotiate a contract with GTE?**