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January 15, 1998

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Prehearing Statement of Sprint-Florida in  
Docket No. 970882-TI

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies  
of Sprint-Florida, Inc.'s Prehearing Statement in  
Docket No. 970882-TI.

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.

ACK ✓ Sincerely,

AFA \_\_\_\_\_

APP ○ 

CAF 2 Charles J. Rehwinkel

CMH 2 CJR/th

CTR \_\_\_\_\_ Enclosures

LED \_\_\_\_\_

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RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Proposed Rule 25-24.845, )  
F.A.C., Customer Relations; )  
Rules Incorporated and Proposed )  
Amendments to rules 25-4.003, )  
F.A.C., Definitions; Rules 25-4.110 )  
F.A.C., Customer Billing; Rules )  
25-4.118, F.A.C., Interexchange )  
Carrier Selection; Rules 25- )  
24.490 F.A.C., Customer )  
Relations: Rules Incorporated. )

Docket No. 970882-T1

Filed: January 15, 1998

**PREHEARING STATEMENT OF SPRINT-FLORIDA**

Pursuant to Order No. PSC-97-1071-PCO-TL, issued, 1997 and Rule 25-22.038(3), F.A.C., Sprint-Florida, Incorporated ("Sprint-Florida") files this Prehearing statement.

**A. Witnesses.**

At this time the only witness Sprint-Florida intends to call is Dwane Arnold.

**B. Exhibits.**

At this time Sprint-Florida has not identified any exhibits in this proceeding.

**C. Basic Position.**

Sprint-Florida's basic position in this docket is that we support the FPSC's initiative in attacking the issues of slamming and cramming.

**The FPSC has proposed some solutions that have potential to be effective. Proposals to eliminate deceptive and misleading LOAs (letters of Authorization) and to educate the public on PIC freeze options will serve the customers and help stem the tide of slamming.**

**Some billing system revision proposals, on the other hand, probably need more consideration regarding feasibility and cost-effectiveness. Specifically, the bill block option and bill information proposals need further evaluation. Also, proposals to give up to 90 days free service may have the unintended effect of creating fraudulent claims of slamming from customers.**

**Because the opportunity to evaluate the cost impact of the proposals voted on by the Commission on December 16 has been limited, Sprint cannot make a meaningful determination of which aspects of the rule proposals can be supported and which cannot. Sprint does not believe it is reasonable to expect the Company to develop costs in less than 30 days for proposed rules which would have significant impacts on the company's operations and operating support and billing systems. This task is made even more difficult when the proposal is not accompanied by reasonably detailed technical specifications or implementation criteria.**

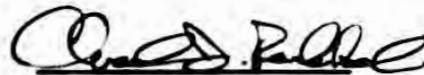
#### **D. Questions of Law, Policy or Fact at Issue.**

**At this time Sprint believes that the entire rulemaking process involves issues of law, fact and policy. The Commission must insure that any rule adopted complies with the provisions of chapter 120 and involves a valid exercise of the authority specifically granted to it by chapter 364. Furthermore, the Commission must insure that the facts that it relies upon in determining cost-effectiveness of various proposals are verifiable and supportable and that affected parties have had a reasonable opportunity to present such facts in the time frame provided. Also, the Commission must insure that the resulting rules advance the policies of consumer protection, competition and economic fairness.**

#### **H. Compliance Matters.**

**At this time Sprint cannot determine whether the process in this docket has given Sprint a reasonable opportunity to determine the costs of some of the more significant proposals that the Commission included in the December 24<sup>th</sup> Notice of Rulemaking. Affected parties have until January 23<sup>rd</sup> to provide such estimates. Sprint does not know at this time if it can adequately comply with the request for cost information sent by staff on January 2<sup>nd</sup>. Sprint hereby reserves any objection it might have until after that opportunity has passed. Otherwise, there are no matters that Sprint-Florida is aware of that cannot be complied with.**

**Respectfully Submitted,**



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**CERTIFICATE OF SERVICE  
DOCKET NO. 970882-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 15<sup>th</sup> day of JANUARY, 1998 to the following:

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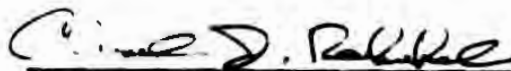
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