

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of Sprint Communications Company, Limited Partnership d/b/a Sprint and Sprint Metropolitan Networks, Inc. Against BellSouth Telecommunications, Inc. Regarding Breach of Interconnection Agreement.

Docket No. 971314-TP

Filed: February 6, 1998

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 Order No. PSC-97-1614-PCO-TP, Order Establishing Procedure, submits its Prehearing Statement.

A. Known Witnesses:

Sprint intends to call Melissa L. Cloz, Mildred A. Graham and Richard A. Warner. 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.

	<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
ACK _____			
AFA _____			
APP _____	Melissa L. Cloz	Direct/Rebuttal	1-5
CAF _____	Mildred A. Graham	Direct/Rebuttal	1, 2, 4 & 5
CMU _____	Richard A. Warner	Direct/Rebuttal	1-4
CTR _____			
EAG _____			

B. Known Exhibits. Sprint has prefiled the following exhibits. Sprint reserves the right to use additional exhibits for purposes of cross-examination.

- LEG _____
- LIN _____
- OPC _____
- REN _____
- SEC _____
- WAS _____
- OTH _____

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<u>Witness</u>	<u>Exhibit</u>	<u>Description</u>
	<u>Direct</u>	
Melissa L. Cloz	MLC-1	4/18/96 Letter/Stipulation
	MLC-2	SMNI 10/28/96 Discussion Issues
	MLC-3	BST FOC Problems
	MLC-4	4/18/97 Letter to C. Jarman from M. Cloz
	MLC-5	4/25/97 Letter to M. Cloz from C. Jarman
	MLC-6	5/1/97 Letter to J. Baker from G. Head
	MLC-7	5/5/97 Letter to G. Head from J. Baker
	MLC-8	5/19/97 Letter to C. Jarman from M. Cloz
	MLC-9	6/18/97 Letter to J. Baker from G. Head
	MLC-10	BST meeting handout on Sprint Metro Service
	MLC-11	7/1/97 Letter to J. Cascio from J. Baker
	MLC-12	7/8/97 Letter to M. Cloz from C. Jarman
	<u>Rebuttal</u>	
	MLC-13	6/12/97 Letter to M. Cloz from C. Jarman
	<u>Direct</u>	
Mildred A. Graham	MAG-1	BellSouth FOC Problems
	MAG-2	BellSouth Facilities Problems
	MAG-3	Affidavit of G. Pegram
	MAG-4	Affidavit of B. Pickering

<u>Witness</u>	<u>Exhibit</u>	<u>Description</u>
Mildred A. Graham	MAG-5	Affidavit of S. Laney
	MAG-6	Affidavi of J. Downs and correspondence re: J. Downs
	MAG-7	Affidavit of R. Santomissino
	<u>Rebuttal</u>	
	MAG-8	January 1998 BellSouth FOC Problems
	MAG-9	January 1998 BellSouth Facilities Problems
	<u>Direct</u>	
Richard A. Warner	RAW-1	4/18/96 Stipulation/Letter
	RAW-2	Interconnection Agreement between SMNI and BellSouth
	RAW-3	4/18/97 Letter to C. Jarman from M. Closz
	RAW-4	4/25/97 Letter M. Closz from C. Jarman
	RAW-5	BellSouth FOC problems
	RAW-6	5/1/97 Letter to J. Baker from G. Head
	RAW-7	7/8/97 Letter to M. Closz from C. Jarman
	RAW-8	6/1/97 Letter to All Competitive LECs from J. Baker (BST)

C. Basic Position

BellSouth has failed to comply with the terms of its Interconnection Agreement with SMNI. Such failures have negatively impacted the quality of service that Sprint is able to provide to

its customers, consequently damaging Sprint's reputation and credibility in the marketplace. The problems caused by BellSouth's failure to perform have significantly increased Sprint's operational and acquisition costs, impairing its ability to enter the local exchange market in Florida.

D-F. Issues. Sprint's position on the issues that have been identified in the Order Establishing Procedure are as follows:

ISSUE 1. Has BellSouth provided Firm Order Confirmation in a timely and accurate manner as agreed to by BellSouth and SMNI? (Count I)

Issue 1A: If not, what relief, if any is appropriate?

Sprint: No. BellSouth does not provide Firm Order Confirmation in a timely and accurate manner as agreed to by BellSouth and SMNI.

Sprint requests the Commission to order BellSouth to honor its commitment to provide FOCs in a timely and accurate manner, through whatever resource additions, process improvements, or other actions deemed necessary. Sprint also requests that the Commission open a generic docket to establish performance measurements and service quality standards governing the provisioning of wholesale services.

Issue 2. Has BellSouth identified provisioning problems in a timely manner to enable SMNI to meet customer due dates at parity with the service provided by BellSouth to its retail customers? (Count II)

Issue 2A. If not, what relief, if any, is appropriate?

Sprint: No. BellSouth has repeatedly failed to notify Sprint in a timely manner of facilities issues which prevent Sprint from meeting the customer's desired due date.

Sprint requests the Commission to Order BellSouth to notify Sprint, within 48 hours of order of receipt, of facilities limitations and/or provisioning problems in connection with Sprint's service requests. Sprint also requests that the Commission order BellSouth to establish an expedite procedure and an escalation procedure for loop order processing.

Issue 3. Has BellSouth provided installation intervals for service established via unbundled loops in accordance with the interconnection agreement between BellSouth and SMNI? (Count II)

Issue 3A. If not, what relief, if any, is appropriate?

Sprint: No. BellSouth has failed to provide installation intervals for service established via unbundled loops in accordance with the interconnection agreement between BellSouth and SMNI.

Sprint believes that the Commission should institute an investigation into BellSouth's retail operations to determine BellSouth's current provisioning intervals for BellSouth retail customers and require BellSouth to demonstrate that services are

provisioned for SMNI at parity with services BellSouth provides to its own end users.

Sprint requests that the Commission order BellSouth to file periodic reports which reflect its current provisioning intervals to its end users as compared to its actual performance in providing services to ALECs.

Sprint also requests that the Commission order BellSouth to immediately devote adequate resources to the operation of its Local Carrier Service Center to ensure that orders received from SMNI can be processed on a timely basis.

Issue 4. Has BellSouth disconnected customers seeking to migrate to SMNI service prior to the designated cut over date? (Count III)

Issue 4 A. If so, what relief, if any is appropriate?

Sprint: Yes. SMNI customers have been subjected to untimely disconnections associated with the service conversion process. On numerous occasions, BellSouth has been unable to stop service disconnection orders from being processed when the cutover to SMNI has been delayed.

Sprint believes the Commission should Order BellSouth to immediately modify its methods, procedures and systems for handling migrations so that customers are not inappropriately disconnected in the process.

Issue 5. Has BellSouth caused service interruptions to SMNI customers due to call routing errors, translation problems, or failure to properly implement interim number portability? (Count IV)

Issue 5A. If so, what relief, if any, is appropriate?

Sprint. Yes. SMNI has experienced service interruptions on numerous occasions resulting from BellSouth call routing errors, translations problems and failure to properly provision and implement number portability. As a result, calls have been not been completed to SMNI customers.

Sprint believes that the Commission should order BellSouth to implement a permanent solution that will prevent software instructions for SMNI call routing from being removed or revised in error. The Commission should also order BellSouth to develop procedures to implement, maintain and restore local number portability so that SMNI customer services will not be inappropriately interrupted.

G. Stipulations. There are no stipulations between Sprint and BellSouth at this time.

H. Pending Motions. Sprint has no pending motions at this time.

I. Other Requirements. Sprint is not aware of any requirements set forth in the Order Establishing Procedure with which it is unable to comply.

DATED this 6th day of February 1998.

Respectfully submitted,



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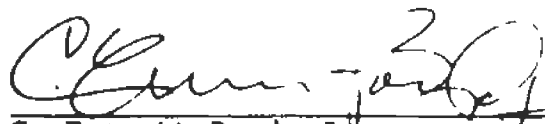
Attorneys for Sprint Communications
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery on this 6th day of February 1990 to the following:

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Mr. Javaya

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