

ORIGINAL

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JOSEPH C. JACOBS
(1923-1998)
LEROY COLLINS
(1909-1991)

May 15, 1998

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 Number 960786-TL

Dear Ms. Bayo:

Enclosed is the original of Sprint and SMNI's Request for Confidential Classification of Melissa Cloz's Late-Filed Deposition Exhibits 1 through 6, along with five copies, to be filed in the referenced docket. Also enclosed is a copy to file stamp and return to me.

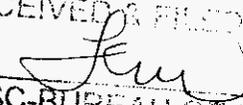
Should you have any questions, please give me a call.

Sincerely,


C. Everett Boyd, Jr.

CEBJr/bc
Enclosures

cc: All Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05447 MAY 15 98

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

Docket No. 960786-TL

Filed: May 15, 1998

**SPRINT AND SMNI'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF MELISSA CLOSZ'S LATE-FILED DEPOSITION EXHIBITS 1 THROUGH 6**

Sprint Communications Company Limited Partnership ("Sprint") AND Sprint Metropolitan Networks, Inc. ("SMNI"), by and through their undersigned counsel, and pursuant to Section 364.183, Florida Statutes, and Commission Rules 25-22.006(4) and (5), Florida Administrative Code, file their request for confidential classification of Late-Filed Deposition Exhibits 1 through 6 filed by Sprint/SMNI witness Melissa Cloz in this docket, and in support thereof state:

1. During the August 8, 1997, deposition of Melissa Cloz taken in this docket, Commission Staff and BellSouth requested Ms. Cloz to provide Late-Filed Exhibits 1 through 6. The late-filed exhibits are entitled (1) Documentation of Rate Adjustments, (2) Performance Standards Agreed to by Sprint/BellSouth, (3) Request by Sprint to BellSouth for EDI Information, (4) Number of NXXs Requested by Sprint, (5) Number of Numbers in Use by Sprint in Each NXX, and (6) Lost Customers and Surrounding Circumstances Due to BellSouth's Problems. Sprint and SMNI maintain that information contained in Late-Filed Exhibits 1 through 6 is confidential and proprietary.

DOCUMENT NUMBER-DATE

05447 MAY 15 88

ERVIN, VARN, JACOBS & ERVIN TALLAHASSEE, FLORIDA

FPSC-RECORDS/REPORTING

2. Late-Filed Deposition Exhibit 1 identifies specific, individual facilities utilized by Sprint/SMNI in its network to serve specific customers. This information directly relates to Sprint/SMNI's competitive interests. Disclosure of this information would impair Sprint/SMNI's competitive business interests by allowing competitors to ascertain the precise configuration of Sprint/SMNI's network of facilities and thus its relative cost structure. This information is intended to be and is treated by Sprint/SMNI as proprietary and confidential.

3. Late-Filed Deposition Exhibit 2 identifies performance measurement standards agreed to by Sprint/SMNI and BellSouth, as well as other measurement standards which are the subject of continuing negotiations between Sprint/SMNI and BellSouth. This information relates to Sprint/SMNI's competitive interests, and disclosure of same would impair Sprint/SMNI's competitive business interests by allowing competitors to ascertain the business, network and operating strategies utilized by Sprint/SMNI and performance measurements deemed critical by Sprint/SMNI to those strategies. This information is intended to be and is treated by Sprint/SMNI as proprietary and confidential.

4. Late-Filed Deposition Exhibit 3 explains and reflects Sprint/SMNI's correspondence requesting information from BellSouth about the EDI system. This information relates to Sprint/SMNI's competitive interests, and disclosure of same would impair Sprint/SMNI's competitive business interests by enabling competitors to ascertain Sprint/SMNI's technical and operating

strategies for entry into the local exchange market. This information is intended to be and is treated by Sprint/SMNI as proprietary and confidential.

5. Late-Filed Deposition Exhibits 4 and 5 identify the number of NXXs requested from BellSouth by Sprint/SMNI, and the number of telephone numbers in each NXX being utilized in each NXX. This information directly relates to Sprint/SMNI's competitive interests. Disclosure of this information would impair Sprint/SMNI's competitive business interests by allowing competitors to ascertain Sprint/SMNI's market penetration. This information is intended to be and is treated by Sprint/SMNI as proprietary and confidential.

6. Late-Filed Deposition Exhibit 6 identifies and explains specific customers of Sprint/SMNI lost due to provisioning or network problems, and the circumstances surrounding the individual customers' service and service problems. This information relates to Sprint/SMNI's competitive interests. Disclosure of this information would disclose specific customer names in violation of Section 364.24, Florida Statutes. Disclosure of this information would impair Sprint/SMNI's competitive interests by enabling competitors to discover past and present (one customer only switched part of its service back to BellSouth) Sprint/SMNI customers and types of services and Sprint/SMNI facilities and network configuration utilized to provide such services. This information is intended to be and is treated by Sprint/SMNI as proprietary and confidential.

7. Sprint and SMNI request that the information described in paragraphs 2 through 6 above be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes. See Order No. PSC-97-1039-CFO-TL, issued September 2, 1997.

8. Sprint and SMNI file as Attachment "A" attached hereto two copies of Late-Filed Deposition Exhibits 1 through 6 with the confidential information redacted.

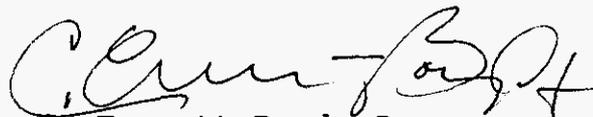
9. Sprint and SMNI file as Attachment "B" attached hereto one copy of Late-Filed Deposition Exhibits 1 through 6 with the specific information asserted to be confidential highlighted. Exhibit "B" is sealed and labeled "Proprietary and confidential".

9. Sprint and SMNI request that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 364.183(4), Florida Statutes.

WHEREFORE, for the foregoing reasons, Sprint and SMNI respectfully request that its Request for Confidential Classification be granted.

DATED this 15th day of May, 1998.

Respectfully submitted,



C. Everett Boyd, Jr.
Florida Bar No. 0190960
Ervin, Varn, Jacobs & Ervin
Post Office Drawer 1170
Tallahassee, FL 32302
(850) 224-9135

and

Benjamin Fincher
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Atlanta, GA 30339
(404) 649-5146

Attorneys for Sprint Communications
Company Limited Partnership and
Sprint Metropolitan Networks, Inc.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of Sprint and SMNI's Request for Confidential Classification of Melissa Cloz's Late-Filed Deposition Exhibits 1 through 6 has been delivered by U.S. mail to Nancy White, c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Tallahassee, FL 32301, and a copy has been furnished by Hand Delivery* or U.S. mail, this 15th day of May 1998, to:

Beth Keating *
Division of Legal Services
Fla. Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Richard D. Melson
Hopping Green Law Firm
120 South Calhoun Street
Tallahassee, FL 32301

Floyd R. Self
Messer Law Firm
215 South Monroe Street
Suite 701
Tallahassee, FL 32301

Thomas K. Bond
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342

Marsha E. Rule
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Laura L. Wilson
Charles F. Dudley
Florida Cable Telecom. Assn.
310 North Monroe Street
Tallahassee, FL 32302

Andrew O. Isar
Telecommunications Resellers
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

Nancy H. Sims
Southern Bell Telephone Co.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

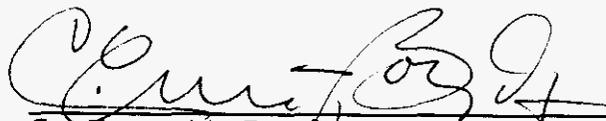
Patrick K. Wiggins
Donna L. Canzano
Wiggins & Villacorta
Post Office Drawer 1657
Tallahassee, FL 32302

Enrico C. Soriano
John E. Canis
Kelley Drye & Warren
1200 19th Street, N.W.
Suite 500
Washington, DC 20036

Kenneth A. Hoffman
Rutledge, Ecenia Law Firm
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

John R. Marks, III
Knowles, Marks & Randolph, P.A.
528 East Park Avenue
Tallahassee, FL 32301


C. Everett Boyd, Jr.

CONFIDENTIAL

File

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

Docket No. 960786-TL

LATE-FILED EXHIBIT NO. 1 TO THE DEPOSITION OF MELISSA L. CLOSZ

Documentation of Rate Adjustments

The attached documentation details SMNI's request for bill adjustments for only the months of May, June and July, 1997. Previous adjustments were requested but have been omitted due to the volume of information that would be required to represent SMNI's experiences thus far. Also, this is just one of several bills that SMNI receives monthly for services purchased from BellSouth. Adjustments have been requested on other bills as well.

The "Bill Adjustment Investigation Requests" submitted by SMNI and the "CABS Billing Adjustment Notifications" are being provided for July bill issues only due to the volume of documents which were submitted for previous months.

Adjustments requested for SMNI's May invoice were submitted by SMNI on June 4, 1997, and adjustments were not issued by BellSouth until July 31, 1997.

June adjustments were requested by SMNI July 8, 1997, and were issued by BellSouth between August 8 and August 12, 1997.

See pages 1-21 attached hereto.

ATTACHMENT "A"

To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc: inet [lynn.a.smith@bridge.bst.bls.com], Melissa Closz@MKT-MTLD,
SMTP[linda.s.mcgrue@bridge.bst.bls.com]

Melissa L. Closz
Docket No. 960786-TL
Page 1

Bcc:
Subject: July Bill Issues for [REDACTED]
Attachment: jul97.doc, jul147.doc
Date: 8/5/97 11:36 AM

Linda Haynes,

The attached file JUL97.xls contains 6 Billing Adjustment Investigation Reports for the July Bill [REDACTED]

The attached file JUL147.xls contains 2 Billing Adjustment Investigation Reports for the July Bill [REDACTED]

I will also be faxing you a copy since the files do not transfer very well to you. Please call is you need more detail or have any questions.

Thanks for your help in resolving this issues.

Melissa/Lynn/Linda,
Just to give you a summary
407-N16-0088-088

[REDACTED] where they don't apply
[REDACTED] elements where they don't apply

407-N19-0147-147
1 new orders this month

[REDACTED] where they don't apply

These are the same two issues we have had since the beginning.

The rates for [REDACTED] have been cleared up for the monthly recurring. However, the Non Recurring still needs to be credited.

I know Linda Haynes is working on these issues because I have begun receiving responses from our May issues. Hopefully, June and July won't be far along.

Thanks and please call if anyone has any questions.
Beth Day
Business Administrator
(407) 206-0010

CONFIDENTIAL

Late-Filed Deposition Ex. 1
Melissa L. Closz
Docket No. 960786-TL
Page 2

CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797801

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. [REDACTED]

Line # _____
(if applicable)

[REDACTED]
(if applicable)

Reason amount in question:

[REDACTED]

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 6/19/97
Service Order Number: CY4TY10
PON Number: [REDACTED]

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to fax number shown above by 8/15/97.

Sincerely,
Beth Day

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 3

CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797802

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. [REDACTED]

Line # _____

(if applicable)

[REDACTED]

(if applicable)

Reason amount in question:

[REDACTED]

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 6/24/97
Service Order Number: CY47X8Y4

[REDACTED]

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 4

CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0727803

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. [REDACTED]

Line # _____ (if applicable) [REDACTED] (if applicable)

Reason amount in question:

[REDACTED]

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/7/97
Service Order Number: CY308G04
PON Number: [REDACTED]

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day Tel #: 407-206-0010

Concur: _____ Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

Late-Filed Deposit
Melissa L. Closz
Docket No. 960786-TL
Page 5

CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797804

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. [REDACTED]

Line # _____
ORLDFL.PCK01

(if applicable)

[REDACTED]
(if applicable)

Reason amount in question:

This order was for [REDACTED]

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/11/97

Service Order Number: CYBICAG1

PON Number: [REDACTED]

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to fax number shown above by 8/15/97.

Sincerely,
Beth Day

Late-Filed Deposition Ex. 1
Melissa L. Closz
Docket No. 960786-TL
Page 6

CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797805

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. [REDACTED]

Line # _____

(if applicable)

[REDACTED]
(if applicable)

Reason amount in question:

[REDACTED]

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/14/97

Service Order Number: CYENWG18

PON Number: [REDACTED]

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

Late-Filed Deposition Ex. 1
Melissa L. Closz
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CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797806

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc.

Account: 

Line # _____
(if applicable)

Circuit #: _____
(if applicable)

Reason amount in question:



- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: _____

Service Order Number: _____

PON Number: _____

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

CONFIDENTIAL



CABS Billing Adjustment Notification

Form 5511
(11-86)

ATTN: Beth Day Contact Number: 407 206 0010
 ACNA: JMN Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED]
 Circuit ID: [REDACTED] Dispute Type: [REDACTED]
 Bell Order Number/PON Number: _____ Disputed Invoice #: _____
 Adjustment Audit Number: 0797801 Disputed Date: 6
 Credit Amount: [REDACTED] Issued on Invoice: 97197 July
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: NRC 627.20
REC 944.22 06-19/08.15

An order will be issued to correct

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L. Haynes BST #: 800 823 2455 EXT 5501777
 Date: 08-13-97 Fax Number: 205 972 2124

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 9

CONFIDENTIAL

Form 8511
(11-96)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: smw Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED] CR: _____
 Circuit: [REDACTED] Dispute Type: Char Term
 Bell Order Number/PON Number: _____ Disputed Invoice #: _____
 Adjustment Audit Number: 0797802 Disputed Date: _____
 Credit Amount: [REDACTED] Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: [REDACTED]
[REDACTED]

Invoice Adjustment Will Appear On: Aug 16

Concurs: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____

BST Contact: L Haynes BST #: 800 823 2455 550111

Date: 8-14-97 Fax Number: 205 972 2124

Late-Filed Deposition Ex. 1
Melissa L. Cloz
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Page 10

CONFIDENTIAL

Form 5511
(11-96)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 907 206-0010
 ACNA: SMW Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED] CKR: _____
 Circuit ID: [REDACTED] Dispute Type: [REDACTED]
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797803 Disputed Date: _____
 Credit Amount: [REDACTED] Issued on Invoices: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: [REDACTED]
[REDACTED]

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L. Hays BST #: 800 823 2455 EXT 560177
 Date: 8-14-97 Fax Number: 205 972 2124

Late-Filed Deposition Ex. 1
Melissa L. Closz
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Page 11

CONFIDENTIAL

Form 5511
(11-88)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407.206-0010
 ACNA: SMW Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED] CKR: _____
 Circuit ID: [REDACTED] Dispute Type: _____
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797804 Disputed Date: _____
 Credit Amount: [REDACTED] Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: [REDACTED]
[REDACTED]

Invoice Adjustment Will Appear On: Aug 16

Concurs: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____

BST Contact: L. Haynes BST #: 800 823 2455 EXT 35017#

Date: 08-14-97 Fax Number: 205 972 2129

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 12

CONFIDENTIAL

Form 5511
(11-96)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: SMW Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED]
 Circuit ID: _____ Dispute Type: LPC
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797806 Disputed Date: _____
 Credit Amount: [REDACTED] Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: _____

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L Hayes BST #: 800 823 2455 ^{EXT} 55077
 Date: 8-14-97 Fax Number: 205 972 2124

Late-Filed Deposition Ex. 1

Melissa L. Closz

Docket No. 960786-TL

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To: SMTP[linda.s.mcgrue@bridge.bst.bls.com]

From: Beth Day@MKT-MTLD

Cc: Richard Warner@MKT-MTLD,

Xchange@Sprint@CDS [G-Melissa/S-Closz/A-Telemail/P-Sprint/C-US]

Bcc:

Subject: Bill [REDACTED]

Attachment:

Date: 7/9/97 4:17 PM

Linda,

We spoke last week and I expressed my concern that Sprint is continuing to see the same billing issues that were occurring in January and February. You asked for facts so I have quantified the issues into categories. Please note this is only for the bill [REDACTED]

The June 16, 1997 bill contained [REDACTED]

[REDACTED]

2 of the orders contained the error of billing interoffice elements where there was none.

32 of the orders contained the wrong rates as stated in our interconnection agreement (effective 1/1/97).

Just as an FYI-there are [REDACTED]

Also, to date, the retroactive billing adjustment due to Sprint is recurring and [REDACTED] non-recurring (from 1/1/97 to 7/19/97).

I will be sending an adjustment request form to Linda Haines on all the issues in the near future. If you need more specific information, please give me a call to discuss.

Thanks, Linda, for all your assistance in getting these issues cleared up. You are truly appreciated.

Beth Day
Business Administrator
(407) 206-0010

CONFIDENTIAL

CONFIDENTIAL

Form 5511
(11-96)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206 0010
 ACNA: JMW Disputed Amount: [REDACTED]
 Billing Account Number: [REDACTED]
 Circuit ID: [REDACTED] Dispute Type: Mileage
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797805 Disputed Date: _____
 Credit Amount: [REDACTED] Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: Mileage does not apply, an order will be issued to correct

Invoice Adjustment Will Appear On: 08-16-97

Concurs: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____

BST Contact: L. Harper BST #: 800 823 2455 5307#

Date: 08-14-97 Fax Number: 205 972 2124

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
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To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc: SMTP[linda.s.mcgrue@bridge.bst.bls.com]
Bcc:
Subject: June Billing Issues for [REDACTED]
Attachment: jun97.doc
Date: 7/10/97 2:37 PM

As promised, attached is a file that contains 29 Billing Issues for Bill Ban [REDACTED]

Please feel free to call me to discuss any or all in detail. Thanks again.

Beth Day
Business Administrator
(407) 206-0010

CONFIDENTIAL

Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 16

To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc:
Bcc:

Subject: May Billing Issues for Bill Ban [REDACTED]
Attachment:
Date: 6/4/97 8:54 AM

Linda,

Please verify the following issues:

CONFIDENTIAL

1) Service Order CY5H55L6
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

2) Service Order CY78R523
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

3) Service Order CYC1XXV9
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

4) Service Order CY780DF8
PON # [REDACTED]

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08/20/97 10:45 FAX 404 859 5174
Aug-20-97 09:27A Sprint Metropolitan

SPRINT EXT AFF → E BOYD

004/008
P.03

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

5) Service Order CYG1NTF0
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

6) Service Order CY1MHF60
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

7) Service Order CY59F2G7
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

8) Service Order CY732F38
PON # [REDACTED]

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Aug-20-97 09:27A Sprint Metropolitan 1+407+875+0056 P.04

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

9) Service Order CY885188
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

10) Service Order CY55KH13
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring
Non Recurring

[REDACTED]

11) Service Order CY1M38Y3
PON # [REDACTED]

[REDACTED]

Partial
Monthly Recurring

[REDACTED]

12) Service Order CYC8PPG1
PON # [REDACTED]

[REDACTED]

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two local channels:

Monthly Recurring
Non Recurring



13) Service Order
PON #

CY6THV35



Monthly Recurring
Non Recurring



Beth Day
Business Administrator
(407) 206-0010

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Late-Filed Deposition Ex. 1
Melissa L. Cloz
Docket No. 960786-TL
Page 20

To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Originated by: Steve Crowe@MKT-MTLD
Cc:
Bcc:
Subject: fwd: [REDACTED]
Attachment:
Date: 6/4/97 9:33 AM

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Linda,

The following issue is related to Bill Ban [REDACTED]. The PON [REDACTED] was disconnected on 5/19/97 but since this bill cycle was the 16th, the disconnect will not show up until next month.

Will you please verify that when it was disconnected, SMNI received full credit back to the date of installation? The attached memo explains why SMNI should not pay anything at all for these services.

If there is an issue, please forward to Linda McGrue for her input.

Thanks for your assistance!
Beth Day
Business Administrator
(407) 206-0010

Original Text
From: Steve Crowe@MKT-MTLD@UTF, on 6/3/97 3:32 PM:
To: Beth Day@MKT-MTLD@UTF
Cc: Richard Warner@MKT-MTLD@UTF, INET(Dalrympl@maginet.net)

Here's the information on the [REDACTED]

In the last weeks of April 1997, after months of discussion with numerous BellSouth engineers and project managers, BellSouth exhausted the facilities they had provisioned between the BellSouth central office located [REDACTED]. This resulted in BellSouth being unable to provision circuits that would enable SMNI to provision local service to their customers.

On 4/26/97, after speaking with Linda McGrue/Account Manager-BellSouth's Sprint Account Team, I requested an order [REDACTED] be issued to [REDACTED] provide 'emergency' facility provisioning for SMNI local service conversions due the week of 4/28/97, orders that were currently without BellSouth facility assignments.

The order was completed on 4/28/97. After further review of the BellSouth facilities provisioned on the [REDACTED] installed in the SMNI central office, BellSouth determined there were enough facilities to provision the customers

08/20/97 10:46 FAX 404 859 5174

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Aug-20-97 09:28A Sprint Metropolitan

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due on 4/28. Further discussion with the facilities group and Sprint Account Team, identified another efficient and cost effective method of provisioning the services in the [REDACTED]. A decision was reached to provision all future services in the new method. Orders were issued to establish the new facilities and disconnect the facilities installed on PON [REDACTED] (the decision to disconnect was made the same day, 4/28, the facilities were installed). The decision was discussed with the Sprint Account Team.

[REDACTED] to provide facilities for SMNI customers, was a direct result of BellSouth's lack of facilities provisioning in their [REDACTED] service area. Because the lack of facilities was a result of BellSouth not reacting to SMNI requests for additional facilities in a timely manner (discussions were held as early as January 1997), it is my position that SMNI should not be billed for their installation. The circuits were never used. The decision to use an alternative method to provision customers was made the same day the circuits were installed and the intention to disconnect the facilities was discussed with the Account Team members.

I would suggest you contact Linda McGrue for her support in this manner.

Steve Crowe
SMNI Administrator-Complex
NET 73 (407)875-8645

Original text

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

Docket No. 960786-TL

LATE-FILED EXHIBIT NO. 2 TO THE DEPOSITION OF MELISSA L. CLOSZ

Performance Standards Agreed To Thus Far By Sprint and BellSouth

BellSouth has submitted for Sprint's review the Performance Measurements language that BellSouth recently agreed to with AT&T (Attachment 12 to the AT&T/BellSouth Interconnection Agreement). Sprint is currently preparing a detailed response in which clarification of certain provisions will be requested, a few additional measurements requested, and Commission-ruled performance parameters will be included.

Sprint has communicated to BellSouth that it is in agreement with many of the performance measures detailed in the Performance Measurements draft. Several examples of areas where Sprint will request further negotiation follow:

1. Firm Order Confirmation (FOC)

- a. The Commission, in Docket No. 961150-TP, Sprint's arbitration with BellSouth, approved Sprint's proposed interconnection agreement language to require a four-hour interval to return FOCs in an electronic exchange environment (Order No. PSC-97-0714-FOF-TP).
- b. BellSouth has proposed again to return FOCs within 24 hours of electronic order receipt.
- c.

c.

2. Billing (Customer Usage Data)

- a. The Commission, in Docket No. 961150-TP, Sprint's arbitration with BellSouth, approved Sprint's approved proposed interconnection agreement language to require transmittal of customer usage data (CDRs) within 48 hours of recording (Order No. PSC-97-0714-FOF-TP).

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b. BellSouth has proposed again to transmit CDRs to Sprint within six calendar days of recording.

c. [REDACTED]

3. Unbundled Network Elements

Intervals need to be negotiated for provisioning UNES..

4. Billing (Customer Usage Data)

a. Sprint will propose for consideration a measurement which sets an "outside [REDACTED]

b. BellSouth's current proposed performance measurement states only that > or = 98% of all records are to be delivered within 30 days of the message creation. [REDACTED]

5. At the national level, Sprint has submitted comments and reply comments to the FCC supporting the measurement categories (what should be measured) and measurement methodologies (how to measure - common definitions and calculation formulas) in the LCI petition for rule-making. We feel it is extremely important to have a common understanding of measurements to ensure parity among all entities. This will also allow comparison of an ILEC's (Incumbent Local Exchange Company) performance for multiple ALECs and/or a comparison of the same ILEC across state jurisdictions. Sprint maintains that ILECs should report in four ways: 1) [REDACTED]

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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LATE-FILED EXHIBIT NO. 3 TO THE
DEPOSITION OF MELISSA L. CLOSZ

Request by Sprint to BellSouth for EDI Information

Attached is documentation from SMNI employee Mildred Graham to BellSouth's Sprint Account Team member Linda McGrue requesting information on the availability of EDI for ordering [REDACTED]

The BellSouth Account Team serving Sprint is a team that BellSouth has dedicated to serving the needs of Sprint as a CLEC customer of BellSouth. They are the primary point of interface within BellSouth for Sprint and SMNI. They are charged with representing Sprint and SMNI's requirements to BellSouth's internal organizations to enable Sprint and SMNI to do business with BellSouth most effectively. This includes BellSouth's ordering, provisioning, and maintenance functions, including any electronic interfaces available.

Sprint systems development personnel have had separate discussions with BellSouth's systems development personnel over the past year or so as well. The attached correspondence represents our most recent request for clarification of EDI's capabilities given BellSouth witness Calhoun's testimony that EDI will support transmission of orders for unbundled network elements.

See pages 1-3 attached.

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Aug-22-97 03:32P Sprint Metropolitan

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P.06

To: SMTP@UTF01 [<Linda.S.Mcgrue@bridge.bst.bls.com>]
From: Mildred Graham@MKT-MTLD
Cc:
Bcc: Richard Warner@mkt-mtld
Subject: Follow-up
Attachment:
Date: 7/18/97 11:56 AM

Linda,

As a follow-up to some information that was shared earlier this year, I'm interested in knowing when we will have access to EDI or any other electronic means of [REDACTED]

Let me know the latest, please.

Thanks

Mildred A. Graham
Customer Service Manager- SMNI
407-875-8306 -- Net 73 (Office)
407-980-1613 -- (Pager-Statewide)
407-875-0056 -- (Fax)

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Aug-22-97 03:32P Sprint Metropolitan

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P.07

To: "Mgraham" <mgraham@banyan.utelfla.com>
From: Linda S. Mcgrue <Linda.S.Mcgrue@bridge.bst.bls.com>
Cc:
Bcc:
Subject: RE: Follow-up
Attachment:
Date: 7/21/97 7:06 AM

Mildred -

I'm going to forward your e-mail to LaFawn; she is working closely with the folks at Sprint NIS with LENS, which will allow greater ordering ease and flexibility. I think the [REDACTED] portion will be added third quarter, but I'm headed to a class on it in about 30 minutes and I'll update you when I get back.

Linda Thurber from NIS will be here for a LENS lab next week.

More info later...

Linda

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Late-Filed Deposition Ex. 3
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Aug-22-97 03:32P Sprint Metropolitan

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P.08

To: SMTP@UTF01[<Linda S. Mcgrue
<Linda.S.Mcgrue@bridge.bellsouth.com>]
From: Mildred Graham@MKT-MTLD
Cc:
Bcc: Xchange@Sprint@CDS (G=Melissa/S=Closz/A=Telemail/P=Sprint/C=US)
Subject: Training
Attachment:
Date: 8/7/97 3:41 PM

Linda, for clarification purposes: When we discussed our team getting electronic access to place orders, am I to understand that it is LENS or EDI that we expect to be available for [REDACTED] in the fourth quarter???

Mildred A. Graham
SPOC-Customer Service Manager- SMNI
407-875-8306 -- Net 73 (Office)
407-980-1613 -- (Pager-Statewide)
407-875-0056 -- (Fax)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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LATE-FILED EXHIBIT NO. 4 TO THE
DEPOSITION OF MELISSA L. CLOSZ

Number of NXXs Requested by Sprint

Sprint (SMNI) has requested [REDACTED] NXXs.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's Docket No. 960786-TL
Entry into InterLATA Services
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LATE-FILED EXHIBIT NO. 5 TO THE
DEPOSITION OF MELISSA L. CLOSZ

Number of Numbers in Use by Sprint in Each NXX

NXX

Numbers in Use

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
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LATE-FILED EXHIBIT NO. 6 TO THE DEPOSITION OF MELISSA L. CLOSZ

Lost Customers and Surrounding Circumstances Due to BellSouth's Problems

This exhibit provides several examples of SMNI customers who left SMNI due to problems in unbundled network element provisioning and/or maintenance with BellSouth.

(1) [REDACTED]

- o Customer cutover to SMNI;
- o Noise and static on lines after cutover; trouble-shooting led BellSouth to rework unbundled loop designs that they had been using for provisioning;
- o Callers to customer received "all circuits busy" recording (5/19/97); local numbers portability functionality had been taken out of service in error by BellSouth;
- o Unable to match data speed attained when with BellSouth; (see notes for [REDACTED])
- o Customer switched data lines back to BellSouth.

(2) [REDACTED]

- o Orders for unbundled loops placed with BellSouth (10/3/96);
- o BellSouth reported facilities not available; cutover postponed;
- o At cutover, BellSouth had engineering problems; cutover postponed;
- o Customer cutover (12/16/96);
- o Customer out of service; BellSouth found "open jumper" and repaired (2/25/97);

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- In-coming callers receiving "all circuits busy" recording; local number portability functionality had been taken out of service in error by BellSouth; BellSouth repaired (5/19/97);
 - Repeat trouble per above; BellSouth took out Simulated Facilities Group in error which provides local number portability functionality for SMNI; BellSouth human error identified; BellSouth repaired (6/6/97);
 - Repeat trouble per above incident; BellSouth human error identified; BellSouth repaired (6/24/97);
 - All lines dead; bad card in SMNI central office on BellSouth side of demarcation; BellSouth replaced bad card (7/3/97);
 - Customer requested to be switched back to BellSouth (7/7/97);
 - Customer taken out of service by BellSouth in the process of being switched back to BellSouth; was out of service approximately 11:00 a.m. to 5:00 p.m. (7/7/97), but had BellSouth service full restored after business hours that day.
- (3) [REDACTED]
- Customer was cutover to SMNI;
 - Problem with "squeal" on voice lines after cutover that SMNI and BellSouth were unable to isolate;
 - Data speed was not matching what was achieved with BellSouth; BellSouth and SMNI unable to correct, but believe was due to [REDACTED] within the unbundled loop provisioning scenario. Contributing factor is that BellSouth initially prohibited placement of equipment in SMNI's collocation with BellSouth that would have eliminated several conversions. While BellSouth now says that the equipment can be deployed, the equipment and capital allocation had been re-deployed; project is scheduled to be reworked later this year;
 - Customer requested return to BellSouth.
- (4) [REDACTED]
- Orders for unbundled loops placed with BellSouth;
 - Customer decided he wanted additional lines; order placed; due date changed;

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- o BellSouth orders not revised; customer taken out of service in error;
- o Customer was cutover to SMNI;
- o Problem with "squeal" on main number after conversation; BellSouth and SMNI unable to isolate trouble; customer had been provisioned over different physical facilities than it had been serviced on when service with BellSouth;
- o Customer returned to original BellSouth provisioning scenario; no further problems.