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Charles J. Rehwinkel
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Tallahassee, FL 32309
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October 5, 1998

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

Re: Docket No. 980696-TP Sprint-Florida Incorporated
Supplemental Notice of Response to the Attorney
General's First Set of Interrogatories & Third
Request for Production of Documents

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies
of Sprint-Florida, Inc.'s Supplemental Notice of Response to
the Attorney General's First Set of Interrogatories & Third
Request for Production of Documents.

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.

Sincerely,

ACK _____
AFA 2

APP _____ Charles J. Rehwinkel

CAF _____
CJM King CJR/th

CTR _____ Enclosures

EAG _____

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DOCUMENT NUMBER DATE

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FPSC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)	Docket No. 980696-TP
of Basic Local Telecommunications)	
Service, Pursuant to Section 364.025)	Filed: October 5, 1998
Florida Statutes)	

**NOTICE OF SERVICE SPRINT-FLORIDA, INCORPORATED'S
SUPPLEMENTAL RESPONSES TO ATTORNEY GENERAL'S FIRST
SET OF INTERROGATORIES**

NOTICE IS HEREBY GIVEN that a true and correct copy of Sprint-Florida, Incorporated's Supplemental Responses to the Attorney General's First Set of Interrogatories which were legally propounded by the Attorney General on August 7, 1998 was sent via hand deliver to Michael A. Gross, Assistant Attorney General, Office of the Attorney, PL-01 The Capitol, Tallahassee, FL 32399-1050.

Respectfully Submitted,



Charles J. Rehwinkel
 Attorney
 Sprint-Florida, Incorporated
 Post Office Box 2214
 MS: FLTLHO0107
 Tallahassee, Florida 32316
 850/847-0244

Sprint - Florida, Incorporated
Docket No. 980696-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 1. a.

REQUEST: In the June 19th Division of Auditing Requests, Part 1, Request 3 (2f), the Staff requested that the separations study include "any further breakdown of local which your system is capable of, such as EAS or local private line." If you Company does not provide the separations study with local private line broken out separately, please provide the following information.

a. The local private line revenues for 1997.

RESPONSE: Sprint - Florida, Incorporated's 1997 private line revenues were \$19,613,114.

INFORMATION PROVIDED BY: Sally A. Carr
Senior Manager Separations / USF Matters
Regulatory Affairs

Sprint - Florida, Incorporated
Docket No. 980696-TL
Attorney General's First Set of
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August 7, 1998
Item No. 2. a.

REQUEST: In the separations study requested in Part L Request 3 of the June 19th Division of Auditing Requests, please provide the following data included in the study for Centrex / ESSX or other Centrex-type services.

- a. The revenues from Centrex / ESSX or other Centrex-type service (including, but not necessarily limited to, Intercom, exchange access, Network Access Registers (NARs) and feature services. Please state what revenues are included in the figure provided.

RESPONSE: Sprint - Florida, Incorporated does not include Centrex revenues in the separation study. However, Sprint - Florida, Incorporated's 1997 Centrex Revenues were \$25,728,371. This amount includes access lines, network access registers and all feature services.

INFORMATION PROVIDED BY: Sally A. Carr
Senior Manager Separations / USF Matters
Regulatory Affairs

Sprint - Florida, Incorporated
Docket No. 980696-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 9

REQUEST: With respect to Item 6 of the Request for Production:

- a. Are the directory advertising revenues and costs which are included in the separations study requested in Part I Request 3 of the June 19th Division of Auditing Requests, the same revenues and costs which are shown in the "per book" column of Schedule Z-7? If not, please provide a column with the same lines as shown on Schedule Z-7, but showing the amounts that were included in the above-referenced separations study.
- b. Were the revenues and costs that were included in Schedules B-1, I-1, and I-2 requested in the June 19th Division of Auditing Requests, Part I Request IA the same as shown in the "per books" column of Schedule Z-7? If not, please provide a column which has the same row labels as Schedule Z-7, but show the figures for each of those rows as they were included in the income statement provided in response to the above-referenced income statement.
- c. If replacing the gross profit of directory advertising that was included in the separations study requested in Part I Request 3 of the June 19th Division of Auditing Requests with the gross profit shown in the "Consolidated" column of Schedule Z-7, which is calculated by subtracting line 20 of the "Consolidated" column from line 15 of the "Consolidated" column, or two-thirds of line 15, whichever is higher, would

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
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August 7, 1998
Item No. 9 (continued)

have any significant effect on revenues, expenses, taxes, uncollectible amounts, income taxes, interest, or sheet items other than those shown on Schedule Z-7, please indicate what other items should be adjusted, and the amount of their adjustment assuming that the figures shown in the "Consolidated" column of Schedule Z-7 were used to replace the figures for directory advertising that were included in your separations study. If you believe there are no other items that would be significantly impacted, please so state. If any figures are provided, please provide the workpapers which support the figures provided.

- d. If the gross profit of yellow pages included in Part I Request IA of the June 19th Division of Auditing Requests was replaced with the gross profit from the "Consolidated" column of Schedule Z-7, which is calculated by subtracting line 20 of the "Consolidated" column from line 15 of the "Consolidated" column, or two-thirds of line 15, whichever is higher, would have any significant effect on revenues, taxes, uncollectible amounts, income taxes, interest, or balance sheet items other than those shown on Schedule Z-7, please indicate what other items should be adjusted, and the amount of their adjustment assuming that the figures shown in the "Consolidated" column of Schedule Z-7 were used to replace the figures for directory advertising that were included in your response to the above-referenced request.

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 9 (continued)

If you believe there are no other items that would be significantly impacted, please so state. If any figures are provided, please provide the workpapers which support the figures provided.

RESPONSE: Sprint has not previously completed a Schedule Z-7. To complete this interrogatory Sprint would have to complete analysis and / or studies. The Commission's order in regards to the Attorney General's motion to compel does not require the LECs to perform additional calculations to provide the information in the form requested by the Attorney General.

INFORMATION PROVIDED BY: John M. Felz
Director State Regulatory
Regulatory Affairs

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 19

REQUEST: Regarding the Staff's Data Requests dated June 19, 1998 from the Division of Communications of the FPSC,

- a. Request 4(a) of those Requests asks for a "contribution analysis" for certain services. (Staff had defined "contribution analysis" at the start of that set of requests.) Please also provide the "contribution analysis" (separately for residence and business" for the following services:
 - I. non-published service;
 - II. non-list service.
- b. For each of the services listed in part a. of this Request, please provide all of the Information requested in Requests 4(b) and 4(c) of the June 19th Division of Communications of the FPSC Requests.

RESPONSE:

- a. Sprint has not previously completed a cost study or contribution analysis for either non-published or non-listed service. To address this interrogatory, Sprint would have to complete a cost study for these services, as well as an analysis of the revenues from these services. The Commission's order in regards to the Attorney General's motion to compel does not require the LECs to perform

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 19 (continued)

additional calculations to provide the information in the form
requested by the Attorney General.

- b. See response to 19 a.

INFORMATION PROVIDED BY: John M. Felz
Director State Regulatory
Regulatory Affairs

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 21

REQUEST: Please provide a complete list of all of the residential services, other than basic exchange service and other than any type of toll service which is currently subscribed to or used by (i.e. customers may place calls to directory assistance but do not subscribe to directory assistance on a monthly basis) more than one percent of your residential customers in an average month.

- a. For each of the services listed in your answer to Interrogatory 21 which are not listed in Request 4(a) of the June 19th Division of Communications of the FPSC Requests, please provide the "contribution analysis" ("contribution analysis" is defined at the beginning of that set of requests). Also provide all information requested in parts 4(b) and 4(c) of the June 19th Division of Communications' Requests for these services.

RESPONSE: The request for a contribution analysis for all residential services subscribed to or used by more than one percent of residential customers would require several analyses and / or studies to be performed. Sprint would have to analyze all of its services and determine which services are subscribed to by more than one percent of customers. Once these services were identified, Sprint would have to complete cost studies and contribution analyses for each service. The Commission's order in regards to the Attorney General's motion to compel does not require the LECs to perform additional calculations to provide the information in the form requested by the Attorney General.

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 21 (continued)

INFORMATION PROVIDED BY: John M. Felz
Director State Regulatory
Regulatory Affairs

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 28

REQUEST: Please provide the total recurring charge that a customer would pay under the Company's Centrex/ESSX or other Centrex-type service that contained 20 stations. The recurring charge should include any charges that exist including Intercom service, exchange access, the line charges, the NARs (if your pricing arrangement uses them). Please assume the average number of NARs that is used along with 20 lines. If the Company does not know of any such number, please use four NARs.), rate for features such that each line has at least Call Forwarding and Three-Way Calling. (If distance from the central office affects the price, please assume that the customer is located slightly less than one-fourth of a mile from the central office.)

- a. Please indicate what the additional charge would be to have Caller ID on each of these lines.
- b. Please provide a breakdown of the rates and quantities by each rate element that sums to the figure provided in response to part a. (i.e. the rate and quantity for exchange access, NARS, etc.).
- c. Please provide the total recurring rate that a residential customer would pay in order to have a R1 line along with Call Forwarding and Three-Way Calling. Please provide a breakdown of that total showing the rate for each rate element.

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 28 (continued)

- d. Please indicate what additional charge would apply to also have Caller ID on the residential line discussed in part c. of this Request.
- e. If one residential customer wanted 20 residential lines, would the total charge be 20 times the rates provided in response to parts d. and e. above? If not, please indicate what the total recurring charge would be for a residential customer with 20 residential lines, Call Forwarding and Three-Way Calling. Also indicate what the total recurring charge would be to a residential customer with 20 residential lines with Call Forwarding, Three-Way and Caller ID. Provide the details of the calculations showing quantities and rates by rate elements.

RESPONSE: A Basic Centrex Customer (e.g. 20 lines, Rate Group 6) would incur a recurring monthly rate of \$670.60.

- a. An additional charge of \$5.50 per line would be incurred for Caller ID. On 20 lines the total monthly recurring charge would be \$110.00.
- b. The itemized rates billed per Basic Centrex Line are:

B1 Access Line	\$24.03
Basic Centrex	\$ 6.50
Touch Tone	\$ 1.00

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's First Set of
Interrogatories
August 7, 1998
Item No. 28 (continued)

Three Way Calling	Included in Basic Centrex
Call Forward	\$ 2.00

Total Recurring per line \$33.53

- c. The total monthly recurring cost for a residential customer would be:

Access Line	\$10.23
Three Way Calling	\$ 3.00
Call Forwarding	\$ 3.00
Total Recurring rate	\$16.23

- d. The recurring residential rate for Caller ID is \$7.00.
- e. Yes, the rate would be 20 times the rates stated in c. and d. above if the customer wanted 20 residential lines.

The residential customer would incur the following monthly recurring rates for 20 residential access lines with all equipped with Three Way Calling, Call Forwarding and Caller ID:

Access Line	\$ 10.23
Touch tone	\$ 1.00

Sprint - Florida, Incorporated
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Interrogatories
August 7, 1998
Item No. 28 (continued)

Three Way Calling	\$ 3.00
Call Forwarding	\$ 3.00
Caller ID	\$ 7.00

Total Recurring	\$ 24.23
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For 20 Lines (times 20) \$484.60

INFORMATION PROVIDED BY: John M. Felz
Director State Regulatory
Regulatory Affairs

STATE OF KANSAS

COUNTY OF JOHNSON

BEFORE ME, the undersigned authority, personally appeared Sally A. Carr, who being duly sworn deposes and says:

That she occupies the position of Senior Manager, Separations / USF Matters, and is the person who has furnished answers to the interrogatories No. 1 and 2 and further says that said answers are true and correct to the best of her knowledge and belief.

WITNESS my hand and seal this 29th day of September, A. D., 1998

Signature Sally A. Carr

Anne M. Toller
Notary Public
State of KANSAS

My Commission Expires: 2/2/2002



STATE OF KANSAS

COUNTY OF JOHNSON

BEFORE ME, the undersigned authority, personally appeared John M. Felz, who being duly sworn deposes and says:

That he occupies the position of Director State Regulatory, and is the person who has furnished answers to the interrogatories No. 9, 19, 21 and 28 and further says that said answers are true and correct to the best of his knowledge and belief.

WITNESS my hand and seal this 25th day of September, A. D., 1998

Signature John M. Felz

Anne M. Toller
Notary Public
State of KANSAS



My Commission Expires: 2/2/2002

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications)
Service, Pursuant to Section 364.025)
Florida Statutes)

Docket No. 980696-TP

Filed: October 5, 1998

NOTICE OF SERVICE SPRINT-FLORIDA, INCORPORATED'S
SUPPLEMENTAL RESPONSES TO ATTORNEY GENERAL'S THIRD
REQUEST FOR PRODUCTION OF DOCUMENTS

NOTICE IS HEREBY GIVEN that a true and correct copy of Sprint-Florida, Incorporated's Supplemental Responses to the Attorney Third Request for Production of Documents which were legally propounded by the Attorney General on August 7, 1998 was sent via hand deliver to Michael A. Gross, Assistant Attorney General, Office of the Attorney, PL-01 The Capitol, Tallahassee, FL 32399-1050.

Respectfully Submitted,



Charles J. Rehwinkel
Attorney
Sprint-Florida, Incorporated
Post Office Box 2214
MS: FLTLHO0107
Tallahassee, Florida 32316
850/847-0244

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's Third Request
For Production of Documents
August 7, 1998
Item No. 6

REQUEST: Please provide copies of all responses provided by your company to any request by Staff and any other party in this proceeding. This request includes responses that have already been provided by your company, and also is a continuing request that applies to all future responses provided by your company in this proceeding. Copies of all attachments or documents provided in response to the requests of Staff or other parties should also be provided.

RESPONSE: Sprint is in the process of determining what, if any, additional discovery from other participants is covered by this request. Sprint will provide any documents due to the Attorney General by October 1, 1998. In addition, Sprint will provide all future discovery to the Attorney General when it is completed.

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's Third Request
For Production of Documents
August 7, 1998
Item No. 11

REQUEST: Please prepare and provide a copy of the FPSC Schedule Z-7 "Analysis of Directory Advertising Operations" for the year ended December 31, 1997. A blank copy of Schedule Z-7 is attached to this Request. Be sure to follow the instruction in Footnote (f) of that Schedule, which requires that "the gross amounts billed from all sources" be included.

RESPONSE: Please refer to response to Interrogatory No. 9.

Sprint - Florida, Incorporated
Docket No. 980733-TL
Attorney General's Third Request
For Production of Documents
August 7, 1998
Item No. 12

REQUEST: Please provide the workpapers and other calculations which support the responses provided to all portions of Interrogatory 9.

RESPONSE: Please refer to response to Interrogatory No. 9.