

**Data Request Regarding Advanced Telecommunications Services
Responses of Sprint-Florida, Inc.
November 18, 1998**

The FCC has released a Notice of Proposed Rulemaking and Notice of Inquiry focused on the deployment of advanced telecommunications services. Action in these proceedings may impact Sprint-Florida's plans for deployment of these services as described in responses to this data request.

2. Please describe other services that would constitute "advanced services" under Sec. 706 of the Telecommunications Act of 1996. Include Intrastate and Interstate services both currently offered and planned for deployment within the next year.

Advanced telecommunications services should be viewed as a dynamic concept to ensure that carriers are encouraged to deploy advanced technologies once today's state-of-the-art capabilities become standard.

Sprint now offers Frame Relay and ATM data services in Florida with multiple interface levels available into each of the respective data switches. Frame Relay data switching is available with switch interfaces available ranging from 56 Kb/s to DS-1 to DS-3. ATM data switching is available with switch interfaces available ranging from DS-1 to DS-3 to OC-3. Both of these services qualify as advanced services within the definition provided in Sec. 706 of the Telecommunications Act of 1996.

3. Would these services be marketed directly to end users, or to businesses such as ISPs that would market them to end users?

Sprint-Florida's plan includes offering services on both retail and wholesale levels. Sprint is very interested in working cooperatively with ISPs and other interested companies to act as sales agents for our high-speed data services or to purchase the services wholesale and retail them with their own brand to end-users.

4. Do you provision services to ISPs in such a manner that they may provide their customers xDSL service? If yes, please describe how the service is provisioned

As part of the service offering described in answer 3 above, Sprint is offering and will continue to offer high-speed connections to ISPs that will enable them to serve xDSL customers. The ISDN-PRI circuits that most ISPs purchase today for dial-up traffic will not support xDSL customers. To provide service to xDSL customers, ISPs must purchase a native Internet Protocol (IP) or ATM T1 or faster circuit that connects to Sprint's high-speed data backbone network.

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5. What percentage of your local loops are presently capable of carrying xDSL services? Please provide a list, by exchange

At this time, Sprint is not capable of precisely quantifying what percentage of its loops are presently capable of carrying xDSL services. However, Sprint is willing to develop, in a reasonable time interval (six months after adoption of rules requiring such information be made available), an inventory of loop characteristics that will infer the potential capability of providing xDSL services over a given loop. Initially, this information is intended to be developed for central offices greater than 10,000 lines in size that reside within the top 100 MSAs. Sprint will consider the further development of this information in central offices that serve in excess of 10,000 lines in the remaining MSAs pursuant to a bona fide request. Until that information is developed, however, Sprint can only estimate the percentage of xDSL-capable loops in its network.

Currently, there are several technological issues that restrict the number of loops over which xDSL service can be provisioned.

1. Interference between xDSL signals and other services such as T1 signals (as identified by the industry experts as the most significant Power Spectral Density interferor) in copper cables.
2. The need to provide environmental conditioning for any bulk quantities of the DSLAM equipment. This drives the placement of the DSLAMs to be in the central office.
3. Copper pairs used for xDSL transport cannot contain load coils or excessive bridge taps.
4. The current inability to provide the service over loops behind digital loop carrier (DLC) equipment. For Sprint-Florida, this is a significant issue since a majority of its loops are served through a DLC device.

As a result of these limiting factors, approximately 33% of Sprint's loops are presently capable of carrying xDSL services. However, Sprint anticipates future changes in technology will resolve many of the issues discussed above, and allow the provisioning of xDSL services to a significant number of customers. Future generations of the chip sets in the DSLAM will require less power and generate less heat, allowing these devices to be placed in equipment enclosures the same way today's digital loop carrier equipment is provisioned in the central office. These chip sets will allow Sprint to extend the xDSL capabilities further into the network to a large portion of the customer base. However, there will always be a certain percentage of loops

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that will be not be capable of supporting xDSL services because the service today is distance sensitive.

The results of the ongoing trials will verify or disprove the need to segregate services and these results could improve the current estimates of loops capable of providing the service. Sprint is developing plans to relocate services in the copper plant, if necessary, to provide xDSL capability.

6. What would be necessary for all of your local loops to be xDSL-capable?

Because of the signal interference in copper cables mentioned above in response 5, it would be almost impossible for all loops to be xDSL capable. However, careful placement of services into specific cable binder groups (Binder Management) and deployment of xDSL capable loop electronics, as acceptable chip technology becomes available, is expected to increase the number of available xDSL capable loops to meet service demands, although distance will continue to be a factor when provisioning xDSL type service.

7. Do you have any central offices in Florida that are presently incapable of accepting xDSL capability (e.g. technical incompatibility with DSLAM or other xDSL equipment, or lack of floor space, etc.)? If so, which offices, and what would be required to make them xDSL-capable?

Insufficient floor space is an issue in many of the Sprint central offices in Florida. Planning engineers are continually evaluating alternatives to developing plans to increase the available floor space in these offices. Alternatives studied include, but are not limited to, building additions and replacement of older equipment with newer, more compact equipment having a smaller footprint to make additional floor space available; removal of any unused, little used or retired equipment occupying space suitable for xDSL related equipment; movement of administrative offices to other locations to increase space available for xDSL related equipment; and, consideration of cageless collocation as an alternative to caged, physical collocation to more efficiently utilize limited central office space.

The central offices listed below have very limited floor space and will have to be studied to verify sufficient room is available for DSLAM equipment to be installed.

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Alva	Boca Grande
Buenaventura Lakes	Casselberry
Deltona Lakes	Maitland Park
West Kissimmee	Denton
Shalimar	Valparaiso
Blairstone	Mabry
Monticello	Perkins
Sopchoppy	Woodvile

8. (if not included in your response to #1) Have you deployed or do you have plans to deploy xDSL service, or a functional equivalent, in Florida?

Refer to the response to question number 1.

9. Is your company deploying these services at a rate that is consistent with your optimal business plan? If not, what are the major obstacles to a more rapid deployment of advanced services?

Sprint is deploying these services at a rate consistent with its business plan.

10. Some parties argue that access to high-speed data services for connection to the Internet or for connection to other data-retrieval services should be included under the definition of basic local telecommunications service. Do you agree or disagree with this position? Please explain your answer in detail.

Sprint does not believe that access to high speed data services should be included under the definition of basic local service at this time.

In establishing their definition of basic local service to be used for universal service, the FCC found that access to Internet services at speeds higher than voice grade access was not warranted. (FCC Universal Service Docket CC 96-45, May 8, 1997, Paragraph 83). In arriving at this decision, the FCC considered the instructions of Congress in the Telecommunications Act of 1996 which states that "Universal service is an evolving level of telecommunications services that the Commission shall establish periodically. . ." and that in determining the definition of the services to be supported, the Commission should consider the extent to which such services "... have, through the operation of market choices by customers, been subscribed to by a substantial majority of residential customers." (Telecommunications Act, Section 254 (c) (1)). The FCC determined that there was no record to

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indicate a majority of residential customers currently subscribe to high speed data services for Internet access.

Sprint believes that at this point, the market, rather than a regulatory entity, should determine the rate at which advanced, high speed data services are deployed. Moreover, it is still far too premature to conclude that xDSL or advanced technologies should be included in the definition of basic local telecommunications services and be subject to universal service support. Every expansion to any universal service program must be paid for by telecommunications carriers. There is as yet no evidence that the benefits of expanding universal service funding to cover deployment of advanced technologies is greater than the corresponding costs.