ORIGINAL

Sprint

Charles J. Rehwinkel

22 PM 4:38

January 22, 1999

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
Motion for Reconsideration of Order PSC-99-0068-FOF-TP
And Sprint-Florida Incorporated's Request for Oral
Arguments

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Motion for Reconsideration of Order PSC-99-0068-FOF-TP and Sprint-Florida, Inc.'s Request for Oral Argument on Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP.

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,

Charles J. Rehwinkel

CJR/th

Enclosures

ACK ___
AFA 2
APP ___
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Motion
DOCUMENT NUMBER-DATE
00896 JAN 22 99

Request
DOCUMENT NUMBER-DATE
00897 JAN 22 99

ORIGINAL

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. 989096-TP |
| | ) | Filed: January 22, 1999 |

SPRINT-FLORIDA INCORPORATED'S MOTION FOR RECONSIDERATION OF ORDER NO. PSC-99-0068-FOF-TP

Pursuant to Rules 25-22.060(b) and 25-22.037, F.A.C., Sprint-Florida, Incorporated ("Sprint") files this Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP ("Order"). Sprint seeks reconsideration of the Florida Public Service Commission's ("Commission") decision to substitute a $4,350 Loop Cost Investment Cap ("cap") for the $10,000 cap submitted as a default input in the BCPM 3.1. The input modified at the December 18, 1998 Special Agenda Conference should have been limited in its applicability to BellSouth only. The Commission erred in applying it to Sprint.

Reconsideration is appropriate when the decision maker either ignored, misinterpreted or misapplied the law applicable to the evidence in the proceeding or overlooked and failed to reconsider the significance of certain evidence. See, Diamond Cab Co. V. King, 146 So. 2d 889 (Fla., 1962). Pursuant to this standard and the argument set out below, the Commission should reconsider and change its decision with respect to the Loop Cost Investment Cap.

I. The Issue.

The specific aspect of the Order for which Sprint seeks reconsideration is found at pages 230-231 and reads as follows:

> Loop cost Investment Cap
>
> The BCPM default loop cost investment cap is $10,000. This means the per-line investment is capped at $10,000. Both GTEFL and Sprint used $10,000. BellSouth used an investment cap of $4,350 because BellSouth's own study showed the cost to be less than $10,000.
>
> We believe that BellSouth's study provides better, Florida-specific information than the generic BCPM default values. BellSouth's study indicates that where loop costs would exceed $4,350, the loop should not be put in place, and a different technology, such as wireless, should be employed. We therefore believe the $4,350 cap is appropriate for BellSouth, Sprint and GTEFL.

Sprint submits that the misapprehended the nature of the evidence offered in the proceeding on this issue. Application of the $4,350 investment cap input to ILECs other than BellSouth was inappropriate because the matter was not an issue in dispute and Sprint had no opportunity to present evidence on the matter. Additionally, the Commission has no basis for concluding that the geographic characteristics of Sprint's service area are sufficiently similar to that of BellSouth such that the wireless crossover point that BellSouth proposed for its serving territory would be applicable to Sprint. Sprint's preliminary analysis indicates that the $4,350 cap is not economically achievable. Additionally, there is no evidence in the record that the BellSouth study was Florida-specific. Finally, the use of the BCPM default loop investment

cost cap was in fact supported by all parties (BellSouth excluded).

II. Background.

Sprint, as a BCPM3.1 sponsor, filed the BCPM model and the appropriate inputs as part of its filing in this case. The BCPM and most of Sprint's inputs were challenged by intervenors including MCI and AT&T who sponsored the HAI model and offered their own set of inputs. One of the inputs that Sprint submitted was a loop investment cost cap of $10,000 per loop. As the Order correctly notes, this input recognized that there was a point at which an alternative technology (assumed to be wireless) becomes more cost effective than wireline technology. The Commission voted, however, to substitute a $4,350 cap based on the BellSouth study that was not introduced into the record. The only basis for the new cap was a statement that BellSouth had performed a study. The Commission then assumed that the study was Florida-specific and applicable to Sprint. It is this conclusion for which Sprint seeks reconsideration.

The statement of BellSouth Witness Caldwell reads:

> Originally the 10,000 was a BCPM default number and that was the only information that was available.
>
> Our understanding is that the cap is based upon some kind of wireless technology, the 10,000 was. So we went to our network people, and they had completed recently a study on some wireless technologies, and the cost was less, so we capped it at the smaller of the two numbers based upon that study.

(Caldwell, Exh.75, pp. 52-53). This is the sole piece of evidence upon which the Commission based its decision to apply the $4,350 investment cap to all companies. There is nothing in the cited evidence demonstrating that the BellSouth study is in any way applicable to Sprint, GTEFL, any other LEC or the state of Florida.

III. Argument.

A. The BellSouth study is not applicable to Sprint.

Sprint respectfully disagrees with the conclusions in the Order on this issue. Nowhere does the record support that the BellSouth study -- which itself is not in the record -- is Florida-specific. The statement of Ms. Caldwell seems to suggest that the study was not conducted for the purposes of evaluating whether the cap was appropriate. Rather it appeared to have already been done for some other unstated purpose when Ms. Caldwell "went to [the BellSouth] network people."

Sprint submits that the Commission cannot as a matter of law conclude that the BellSouth study provides "better" information. For one thing, the Commission did not review the study and therefore does not know what assumptions were used. The Commission made no finding as to whether the assumptions that BellSouth used are reasonable with respect to Sprint and the large geographic area where Sprint's rural, insular and high cost customers reside. Nor could such a finding be made.

Sprint submits that the $4,350 per line cap is not an economically achievable alternative to the wireline network modeled by BCPM for

Sprint's territories. Use of the $4,350 cap in BPCM results in 56,251 lines needing to be served by some alternative technology, such as wireless. These lines are scattered over 100 of Sprint's 139 wire centers, covering over 16,600 square miles. Sprint's own internal analysis of the area served by Sprint-Florida indicates that it is impossible to serve such a widely dispersed customer base at such a low cost per line. It is possible that some other type of market exhibiting different characteristics, such as a large number of customers clustered in a relatively small area, might be served at the cost put forth by Bell South. However, the average density of Sprint's grids falling under the $4,350 cap is well under 10 lines per square mile. Furthermore, this density is actually understated since it reflects the distribution of customers within grids but not the distribution of grids within a wire center. For example, the total land area of the grids served in Immokalee is 230 square miles, while the total land area of the Immokalee wire center is 635 square miles. Because the populated grids in Immokalee are located throughout the entire wire center, the average density of customers in the Immokalee wire center is substantially less than the average grid density reported in the BCPM.

Also, because fixed costs such as towers and base station transceivers are the major cost components of wireless technology, low-density areas result in extremely high costs per-line. In addition, the Commission must consider the high cost of interconnecting these widely dispersed cell site locations to a number of wireless switches and base station controllers. In order to connect cell sites to their BSC (Base Station Controller), wireline backhaul facilities, usually a DS1 circuit, must be established. Backhaul introduces a significant additional cost any LEC or CLEC would incur in order to connect to a centralized BSC and switch and

is needed in order to limit initial capital start-up costs. All of these costs would be incremental in nature, and therefore must be considered over and above initial capital outlays for the fixed wireless local loop network components. Backhaul expenses are one of the more significant expense items incurred by most wireless operations today. An alternative would be point to point microwave or fixed fiber facilities, but this represents additional (and significant) capital outlays as well as increased maintenance expense for the additional Radio Frequency (RF) equipment.

Remote powering of the base station and wireless network interface unit located at the customer premise must also be considered. Wireless base stations are DC powered from a battery source typically charged by a commercial AC power source. AC power availability and reliability is a recurring theme for any premise-based telephony device, from both a cost and maintenance perspective. Customers must be willing to provide the necessary power, and telephone technicians must be able to access the customer premise for maintenance purposes.

Radio frequency (RF) equipment is very different technology from wire based facilities that telephone technicians are historically trained and equipped to maintain. In the short-term, significant training expenses would be incurred to bring technician skills 'up to speed', plus additional workforce additions would be required. RF technology requires specialized testing equipment such as spectrum analyzers and drive test gear. Additional RF equipment spares inventory must also be available for maintenance purposes. A partial replacement of the wireline infrastructure will not yield a significant reduction in the amount of fixed facilities that must continue to be maintained. Only a small portion of

distribution cable can usually be eliminated from the network. The same number of technicians, trucks, and test equipment will continue to be required to maintain a parallel wireline infrastructure. In all likelihood, use of additional technicians specifically trained and equipped to handle wireless maintenance will be necessary. One possible alternative may be to outsource this maintenance to a wireless company, however, this might be an area of concern for other reasons. Either option will result in increased maintenance costs to handle a multiple technology infrastructure.

A forward-looking cost study that considers a 'wireless cap' must consider costs such as backhaul and incremental maintenance expenses in addition to the significant initial capital outlay required to provide wireless local loops.

In summary, this analysis suggests that $4,350 cap is not achievable using currently available wireless technology and that substantial technological and cost efficiencies would need to be gained to achieve the lower $4,350 cap put forth by BellSouth. [1]

B. The Commission May Have Mistaken the Materiality Of The Cap Adjustment.

Sprint further believes that the Commissioners may have been under the

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[1]Sprint offers this analysis, which is admittedly outside the record, as the only way to counter the contention that the BellSouth study should be applicable to Sprint. Clearly this a summary of the type of information that Sprint would have offered had the cap been an issue in the case. Since the issue was essentially stipulated as discussed *infra*, no opportunity or need for this evidence existed.

mistaken impression that the number of affected lines was minimal for all LECs. Questions by Commissioners Clark and Deason explored this issue. Staff responded that they did not know how material the issue was. It should be noted that at the time of the vote, the staff's recommendation had been recently amended. The original recommendation showed, for the three LECs, counts for lines above $10,000: BellSouth (20,344)[2] [Rec. at 506]; GTEFL (-0-)[3] [Rec. at 508]; and Sprint (5,701) [Rec. at 511]. On December 17, 1998 a revision was made to the recommendation and revised results reports were filed. Only Sprint's information was changed. The staff revised the presentation to show Sprint's results based upon the old Centel and United territories which are also known as study areas for cost study purposes. In this revision, Sprint is shown to have (-0-) lines above $10,000. [Rev. Rec. at 511-A and 511-B]. Clearly, the Commission could have been understandably confused about whether the existing $10,000 cap was, in fact, actually capping loop cost investment at all.

Sprint has submitted a compliance filing based on the ordered revisions to the model and certain input changes. This filing shows that 8,987 loops exceed the $10,000 threshold[4]. From information submitted with

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[2]Of course BellSouth's number is apparently based on a $4,350 investment cap. Sprint is unaware whether any evidence exists showing the number (if any) of BellSouth lines above the $10,000 cap.

[3]GTE shows no lines above $10,000 despite the fact that the costs for "capped" and "uncapped" amounts are different. This means that despite the line data fields -- which are informational in nature and not integral to the running of the model -- showing no lines above the threshold, some must exist.

[4]Due to a reporting problem discovered after the compliance filing, the line data field in the results report shows the 8,987 figure when the $4,350 cap is input to the model. As shown herein that number should be 56,251. For the $10,000 cap the revised number of lines is 14,563.

the compliance filing on January 12, 1999 it can be demonstrated that over 56,000 Sprint lines exceed the $4,350 threshold.[5] Obviously reducing the cap had a material impact on Sprint. Sprint believes that the ordered adjustment was imposed without legal justification and perhaps was based upon incorrect assumptions made at the time of the vote.

C. The Issue Of The Appropriate Cap Had Been Stipulated As To Sprint.

Sprint also contends that the issue was essentially stipulated and that the Commission should have refrained from making an adjustment for this reason. At no time was this input challenged in the hearing. MCI/AT&T witness Wells testified that:

> The [BCPM 3.1] default value is $10,000, which has been *commonly accepted in numerous proceedings by all parties.* In this proceeding however, BellSouth has filed an investment Loop cost of only $4,350, without any explanation or supporting documentation. (Wells, Tr. 2520).

[Emphasis Added]. Sprint agrees with Mr. Wells that no supporting documentation was produced at hearing. As pointed out by Mr. Wells, the BCPM default has been commonly accepted around the country. No party raised the issue of whether the default cap was too high.

Had the issue been raised in Florida Sprint and other affected LECs could have had the opportunity to review the BellSouth study and decided

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[5]Attachment 1 contains an instruction sheet that walks the reader through the process of extracting the information already in the record necessary to verify the lines above the revised cap. Also included is a spreadsheet showing the results of the calculation.

whether it would accept the BellSouth study, consider conducting its own or present evidence why the BellSouth cost number would be inapplicable to Sprint. Because the applicability to Sprint was raised for the first time at the conclusion of the Special Agenda vote on December 18, 1998, no opportunity was given for Sprint to demonstrate why the appropriate crossover point is not $4,350 based on geographic coverage area, loop density, reasonably available technology and the aspects of wireless service discussed *supra*. Sprint does not know whether the technology assumed in the BellSouth study would allow Sprint to provide service that meets the "basic local telecommunications service" definition found in Section 364.025. In other words there is no record basis for concluding in this stipulated issue that the revised cap is superior to the BCPM or applicable to Sprint.

IV. Conclusion.

Sprint has requested oral argument by separate pleading due to the nature of the issue and the fact that the adjustment was proposed without Sprint ever having notice that a disputed issue existed or that the Commission might intend to apply the BellSouth study results to Sprint.

Wherefor, for the reasons stated above, Sprint respectfully requests that the reconsider its decision to substitute the Loop cost Investment cap of $4,350 for the default BCPM cap of $10,000.

RESPECTFULLY SUBMITTED this 22nd day of January 1998.

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ATTORNEYS FOR SPRINT-FLORIDA, INC.

Attachment 1

**Instructions For Generating Number of Working Lines over Investment Cap**

1. In Windows Explorer, double-click the "BCPM3.1" Directory. Double-click the "Module" subdirectory. Double-click the "Loop" subdirectory.
2. In the Loop subdirectory, open the Loop.xls file.
3. In Column AX, Row 3, create the following SUMIF formula: =SUMIF(V:V, 4350, N:N)
   - *Please note that the actual Investment Cap (i.e. 4,350, 10,000) must be included in the formula
   - *Column V represents the Capped Loop Cost per Line
   - *Column N represents the Total Working Lines Served in Grid
4. Save the changes made to the Loop.xls file and close the file
5. Double-click "Control.xls" under the BCPM3.1 Directory to open the BCPM3.1 model
6. Click Start
7. Click the "Review" module
8. Select the appropriate View
9. Select the "Loop" Module
10. Select the State
11. Select a Wire Center and click **OK**.
12. The "Output" worksheet will be showing when the file opens. The cell in Column AX, Row 3 will be populated with the total number of working lines over the desired investment cap for that specific Wire Center
13. Copy this cell and Paste Special the "Value" onto a separate file that you create to house the Total Working Lines over the Investment Cap for each Wire Center
14. Repeat Steps 11-13 for each Wire Center

**Sprint - Florida**

| Node CLLI Code | Wire Center Name | Lines above 4k investment | Lines above 10k investment | Square Miles in Wire Center Boundary |
|---|---|---|---|---|
| ALFRFLXARS0 | Alford | 906 | 288 | 149 |
| ALSPFLXADS0 | Altamonte Springs | | | 22 |
| ALVAFLXARS0 | Alva | 11 | 11 | 26 |
| APPKFLXADS1 | Apopka | 93 | 9 | 115 |
| ARCDFLXADS0 | Arcadia | 1,514 | 454 | 468 |
| ASTRFLXARS0 | Astor | 117 | 68 | 63 |
| AVPKFLXADS0 | Avon Park | 165 | 99 | 93 |
| BAKRFLXADS0 | Baker | 1,094 | 506 | 246 |
| BCGRFLXARS0 | Boca Grande | | 0 | 3 |
| BLVWFLXADS0 | Belleview | 256 | | 155 |
| BNFYFLXARS0 | Bonifay | 1,940 | 379 | 239 |
| BNSPFLXADS1 | Bonita Springs | 277 | 110 | 118 |
| BSHNFLXADS0 | Bushnell | 962 | 141 | 328 |
| BVHLFLXADS0 | Beverly Hills | | | 67 |
| BWLGFLXARS0 | Bowling Green | 302 | 83 | 66 |
| CFVLFLXADS0 | Crawfordville | 652 | 93 | 165 |
| CHLKFLXARS0 | Cherry Lake | 1,037 | 320 | 164 |
| CHSWFLXARS0 | Chassahowitzka | 281 | 9 | 43 |
| CLMTFLXADS0 | Clermont | 829 | 102 | 166 |
| CLTNFLXARS0 | Clewiston | 896 | 521 | 398 |
| CPCRFLXADS0 | Cape Coral | | | 28 |
| CPCRFLXBDS1 | North Cape Coral | 33 | | 49 |
| CPHZFLXADS0 | Cape Haze | 161 | 29 | 65 |
| CRRVFLXADS0 | Crystal River | 192 | 45 | 130 |
| CRVWFLXADS0 | Crestview | 633 | 29 | 136 |
| CSLBFLXADS1 | Casselberry | | | 14 |
| CTDLFLXARS0 | Cottondale | 390 | 145 | 68 |
| CYLKFLXADS0 | Cypress Lake | | | 45 |
| CYLKFLXBRS0 | Fort Myers Regional Airport | | | 44 |
| DDCYFLXADS1 | Dade City | 280 | 40 | 109 |
| DESTFLXADS0 | Destin | | | 11 |
| DFSPFLXADS0 | Defuniak | 2,073 | 178 | 235 |
| ESTSFLXADS0 | Eustis | 25 | | 52 |
| EVRGFLXARS0 | Everglades | 439 | 139 | 168 |
| FRPTFLXARS0 | Freeport | 924 | 258 | 199 |
| FTMBFLXADS0 | Fort Myers Beach | | | 7 |
| FTMDFLXARS0 | Fort Meade | 486 | 134 | 139 |
| FTMYFLXADS0 | Fort Myers Main | | | 10 |
| FTMYFLXBDS0 | East Fort Myers | 242 | 18 | 72 |
| FTMYFLXCDS2 | South Fort Myers | | | 19 |
| FTWBFLXADS0 | Hollywood | | | 10 |
| FTWBFLXBDS0 | Denton | 55 | 28 | 27 |

| Node CLLI Code | Wire Center Name | Lines above 4k investment | Lines above 10k investment | Square Miles in Wire Center Boundary |
|---|---|---|---|---|
| FTWBFLXCRS0 | Mary Esther | 2 | 2 | 7 |
| GDRGFLXADS0 | Grand Ridge | 449 | 22 | 82 |
| GLDLFLXARS0 | Glendale | 804 | 107 | 89 |
| GLGCFLXADS0 | Golden Gate | 645 | 54 | 241 |
| GLRDFLXADS0 | Goldenrod | | | 23 |
| GNVLFLXARS0 | Greenville | 645 | 552 | 266 |
| GNWDFLXARS0 | Greenwood | 842 | 324 | 147 |
| GVLDFLXARS0 | Groveland | 535 | 51 | 120 |
| HMSPFLXARS0 | Homosassa | 7 | 7 | 55 |
| HOWYFLXARS0 | Howey | 164 | 25 | 34 |
| IMKLFLXARS0 | Immokalee | 482 | 357 | 252 |
| INVRFLXADS0 | Inverness | 260 | 105 | 247 |
| KGLKFLXARS0 | Kingsley Lake | 270 | 46 | 41 |
| KNVLFLXARS0 | Kenansville | 288 | 252 | 304 |
| KSSMFLXADS0 | Kissimmee | 173 | 23 | 119 |
| KSSMFLXBDS1 | West Kissimmee | 440 | 18 | 106 |
| KSSMFLXDRS0 | Buenaventura Lakes | | | 19 |
| LBLLFLXADS0 | LaBelle | 1,099 | 397 | 497 |
| LDLKFLXADS0 | Lady Lake | 150 | 11 | 98 |
| LEE FLXARS0 | Lee | 804 | 230 | 167 |
| LHACFLXADS0 | Lehigh Acres | 347 | 12 | 88 |
| LKBRFLXADS1 | Lake Brantley | | | 20 |
| LKHLFLXARS0 | Lake Helen | 101 | 33 | 34 |
| LKPCFLXARS0 | Lake Placid | 1,131 | 410 | 405 |
| LSBGFLXADS1 | Leesburg | 570 | 127 | 151 |
| LWTYFLXARS0 | Lawtey | 375 | 89 | 51 |
| MALNFLXARS0 | Malone | 640 | 277 | 112 |
| MDSNFLXADS0 | Madison | 558 | 54 | 87 |
| MNTIFLXADS0 | Monticello | 2,489 | 770 | 502 |
| MOISFLXADS0 | Marco Island | | | 20 |
| MRHNFLXARS0 | Moore Haven | 223 | 164 | 151 |
| MRNNFLXADS0 | Mariana | 1,347 | 151 | 175 |
| MTDRFLXADS0 | Mount Dora | 492 | 79 | 126 |
| MTLDFLXADS1 | Maitland Park | | | 3 |
| MTVRFLXARS0 | Montverde | 6 | 6 | 15 |
| NFMYFLXADS0 | North Fort Myers | | | 15 |
| NFMYFLXBDS0 | Suncoast | 122 | 28 | 72 |
| NNPLFLXADS1 | North Naples | | | 48 |
| NPLSFLXCDS0 | Naples Southeast | 1,310 | 274 | 432 |
| NPLSFLXDDS0 | Naples Moorings | | | 31 |
| OCALFLXADS0 | Ocala | 768 | 38 | 189 |
| OCALFLXBDS0 | Shady Road | 298 | 3 | 168 |
| OCALFLXCRS0 | Highlands | | | 7 |
| OCNFFLXARS0 | Forest | 401 | 41 | 141 |
| OKCBFLXADS0 | Okeechobee | 2,845 | 949 | 912 |
| OKLWFLXADS0 | Oklawaha | 51 | 51 | 27 |

| Node CLLI Code | Wire Center Name | Lines above 4k investment | Lines above 10k investment | Square Miles in Wire Center Boundary |
|---|---|---|---|---|
| ORCYFLXADS0 | Orange City | | | 23 |
| ORCYFLXCRS0 | Deltona Lakes | | | 24 |
| PANCFLXARS0 | Panacea | 307 | 45 | 57 |
| PNGRFLXADS1 | Punta Gorda | 938 | 554 | 414 |
| PNISFLXADS0 | Pine Island | 244 | 42 | 87 |
| PNLNFLXARS0 | Ponce DeLeon | 900 | 324 | 119 |
| PTCTFLXADS0 | Port Charlotte | 101 | 1 | 80 |
| RYHLFLXARS0 | Reynolds Hill | 997 | 30 | 96 |
| SBNGFLXADS1 | Sebring | 612 | 167 | 142 |
| SGBHFLXARS0 | Seagrove | 130 | 23 | 68 |
| SHLMFLXADS0 | Shalimar | | | 7 |
| SLHLFLXARS0 | Spring Lake | 304 | 171 | 147 |
| SNANFLXARS0 | San Antonio | 420 | 17 | 94 |
| SNDSFLXARS0 | Sneads | 395 | 82 | 58 |
| SNISFLXADS0 | Sanibel Island | | | 20 |
| SNRSFLXARS0 | Santa Rosa | 17 | 17 | 39 |
| SPCPFLXADS0 | Sopchoppy | 522 | 178 | 154 |
| SSPRFLXARS0 | Salt Springs | 79 | 22 | 73 |
| STCDFLXADS0 | St. Cloud | 1,012 | 559 | 541 |
| STMKFLXARS0 | Saint Marks | 104 | 59 | 50 |
| STRKFLXADS0 | Starke | 907 | 97 | 143 |
| SVSPFLXARS0 | Silver Springs | 401 | 36 | 82 |
| SVSSFLXARS0 | Silver Springs Shores | 41 | 1 | 31 |
| TLCHFLXARS0 | Tallacoochee | 399 | 121 | 74 |
| TLHSFLXADS0 | Calhoun | | | 4 |
| TLHSFLXBDS0 | Willis | | | 18 |
| TLHSFLXCDS0 | Mabry | 635 | 98 | 159 |
| TLHSFLXDDS0 | Blairstone | 223 | 97 | 148 |
| TLHSFLXEDS0 | FSU | | | 3 |
| TLHSFLXFDS0 | Thomasville | 1,006 | 124 | 216 |
| TLHSFLXGDS0 | Woodville | 259 | 70 | 85 |
| TLHSFLXHDS0 | Perkins | | | 28 |
| TVRSFLXADS0 | Tavares | 220 | 34 | 50 |
| UMTLFLXARS0 | Umatilla | 1,226 | 193 | 273 |
| VLPRFLXADS0 | Valparaiso | 141 | 52 | 73 |
| WCHLFLXADS0 | Wauchula | 1,250 | 435 | 323 |
| WLSTFLXARS0 | Williston | 1,745 | 179 | 258 |
| WLWDFLXARS0 | Wildwood | 234 | 67 | 119 |
| WNDRFLXARS0 | Windermere | 44 | | 24 |
| WNGRFLXADS0 | Winter Garden | 159 | | 100 |
| WNPKFLXADS1 | Winter Park | | | 17 |
| WSTVFLXARS0 | Westville | | | 8 |
| ZLSPFLXARS0 | Zolfo Springs | 877 | 293 | 215 |
| **Total** | | 56,251 | 14,563 | |

| Node CLLI Code | Wire Center Name | Lines above 4k investment | Lines above 10k investment | Square Miles in Wire Center Boundary |
|---|---|---|---|---|
| # of access lines | | 1,938,005 | 1,938,005 | |
| % of total lines | | 0.03 | 0.0075 | |

# CERTIFICATE OF SERVICE
# DOCKET NO. 980696-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or Hand Delivery (*) this 22th day of January, 1999 to the following:

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Thus, Sprint requests a brief opportunity to present oral argument in support of the Motion for Reconsideration filed this same day.

RESPECTFULLY SUBMITTED this 22nd day of January 1998.

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