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November 19, 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 Nos. 981834-TP, 990321-TP Prehearing Statement
Of Sprint Communications Company Limited Partnership,
Sprint-Florida Incorporated

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint
Communications Company Limited Partnership and Sprint-Florida
Incorporated Prehearing Statement in Docket Nos. 981834-TP,
990321-TP.

Please acknowledge receipt and filing of the above by stamping the
duplicate copy of this letter and returning the same to this writer.

Sincerely,

- AFA _____
- APP _____
- CAF _____
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- CTR _____
- EAG _____
- LEG 2 _____
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers) DOCKET NO. 981834-TP
For Commission action to support local)
Competition in BellSouth)
Telecommunications, Inc.'s service territory.)

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for generic) DOCKET NO. 990321-TP
Investigation to ensure that BellSouth) FILED: November 19, 1999
Telecommunications, Inc., Sprint-Florida,)
Inc. and GTE Florida Incorporated comply)
with obligation to provide alternative local)
exchange carriers with flexible, timely, and)
cost-efficient physical collocation.)

SPRINT'S PREHEARING STATEMENT

Sprint-Florida Incorporated and Sprint Communications Company Limited Partnership (collectively "Sprint"), pursuant to Order No. PSC-99-1991-PCO-TP, submits the following Prehearing Statement:

A. WITNESSES: At this point in the proceeding, Sprint has filed direct and rebuttal testimony by Michael R. Hunsucker, Director-Regulatory Policy for Sprint. Mr. Hunsucker addresses various policy issues surrounding the collocation issues identified by the Florida Public Service Commission.

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Additionally, Sprint has filed direct and rebuttal testimony by Melissa L. Cloz, Director–Local Market Development for Sprint. Ms. Cloz addresses specific issues identified in the collocation docket.

B. EXHIBITS: Sprint has submitted not exhibits at this time, but may file exhibits at a later time.

C. BASIC POSITION: Sprint operates as an Incumbent Local Exchange Carrier (ILEC) and an Alternative Local Exchange Carrier (ALEC) in the state of Florida. Sprint, by the nature of its diverse business interests, analyzes and develops positions that not only support the pro–competitive goals of the Telecom Act and comply with the FCC's rules but also are not unreasonably burdensome for its ILEC operations. Sprint believes that the Florida Public Service Commission should adopt guidelines and procedures that facilitate the enforcement of the pro–competitive collocation policies adopted by the Federal Communications Commission as codified in Section 51.321 and 51.323 of the FCC rules. In addition, the Florida Public Service Commission should respond to the direction of the FCC in its First Report and Order in Docket No. 98–147 to adopt further guidelines and procedures that will facilitate the provisioning of collocation and enhance telecommunications competition in Florida.

D-F. ISSUES AND POSITIONS:

Issue 1: When should an ILEC be required to respond to a complete and correct application for collocation and what information should be included in that response?

Position: An ILEC should respond within ten (10) calendar days of receipt of an application for collocation to inform the requesting carrier whether space is available or not. (Closz)

Issue 2: If the information included in the ILEC's initial response is not sufficient to complete a firm order, when should the ILEC provide such information or should an alternative procedure be implemented?

Position: All information necessary for the ALEC to submit a firm order, including ICB pricing and technical information, should be provided within 30 calendar days of receipt of an application. Sprint supports an alternative procedure that would allow ALECs to proceed with a firm order once they have

been advised that space is available to accommodate their collocation request.

(Closz)

Issue 3: To what areas does the term "premises" apply, as it pertains to physical collocation and as it is used in the Act, the FCC's Order, and the FCC's Rules?

Position: The FCC Rules in 47 CFR 51.5 define premises as "an incumbent LEC's central offices and serving wire centers, as well as buildings or similar structures owned or leased by an incumbent LEC that house its network facilities, and all structures that house incumbent LEC facilities on public rights-of-way, including but not limited to vaults containing loop concentrators or similar structures." In addition, in paragraph 44 of the First Report and Order in Docket 98-147, the FCC requires an ILEC to allow collocation in adjacent space on the ILEC's premises. The FPSC should expand on the FCC's definition of premises to make structures that house ILEC administrative offices located on adjacent space available for collocation, especially if there is vacant space available in these structures. (Hunsucker)

Issue 4: What obligations, if any, does an ILEC have to interconnect with ALEC physical collocation equipment located "off-premises"?

Position: An ILEC does not have any obligation to provide for collocation of equipment located "off-premises" since the ILEC would not own or control the "off-premises" site. (Hunsucker)

Issue 5: What terms and conditions should apply to converting virtual collocation to physical collocation?

Position: The terms and conditions that should apply to conversions from virtual to physical collocation vary depending on what type of conversion is requested. The ALEC should be required to submit an application for conversion from virtual to physical collocation. If there are no changes to the collocation configuration being requested, the application fee should reflect only the work directly involved in reviewing the conversion request. In these instances the ILEC should provide the ALEC with records change notification within 30 calendar days of receipt of a conversion application. If the ALEC requests a conversion from virtual collocation to physical collocation that

requires changes, then the ILEC's standard provisioning terms, conditions, and intervals for physical cageless collocation should be followed. A request to convert a virtual collocation arrangement that occupies less than a full bay would be considered a conversion requiring changes, as the ILEC could choose to move it. (Closz)

Issue 6: What are the appropriate response and implementation intervals for ALEC requests for changes to existing collocation space?

Position: The appropriate response and implementation intervals will depend on the type of change being requested. For example, simple change-outs of a particular type of equipment may require only record changes on the part of the ILEC. Other changes may impact the power or other infrastructure requirements. When the change requires no physical work on the part of the ILEC other than record updates, ILEC's should respond to ALEC notification of such change that its records have been updated within 15 calendar days of the ALEC's change notification. When changes are required, provisioning intervals should be reflective of the work required but should not exceed 30 calendar days from the receipt of an ALEC's request for a change. Longer intervals may be warranted only in cases where ILEC infrastructure improvements are

required, but these cases should not exceed 90 calendar days from receipt of the change request. (Closz)

Issue 7: What are the responsibilities of the ILEC and collocators when:

- (A) a collocator shares space with, or subleases space to another collocator;
- (B) a collocator cross-connects with another collocator.

Position: FCC Rule 51.323 (k) (1) addresses the issue of shared collocation cages. An ILEC may not increase the cost of site preparation or nonrecurring charges above the cost for provisioning a similar cage to a single collocating party. In addition, an ILEC must prorate the charges for site conditioning and preparation based on the percentage of total space used by a collocating carrier, may not place unreasonable restrictions on a new entrant's use of a collocation cage, and must permit each ALEC to order unbundled network elements to and provision service from that shared collocation space.

FCC Rule 51.323 (h) addresses the issue of cross connection between two collocators. Specifically, ILECs shall permit collocating telecommunications carriers to interconnect their respective network to the network of other collocating carriers, when the telecommunications carrier does not request the

ILEC construction of such facilities. Additionally, the ILEC must do the construction upon request. (Hunsucker)

Issue 8: What is the appropriate provisioning interval for cageless physical collocation?

Position: The appropriate interval is the same as the interval for virtual collocation, that is, 60 calendar days from receipt of a firm order from an ALEC.

(Closz)

Issue 9: What is the appropriate demarcation point between ILEC and ALEC facilities when the ALEC's equipment is connected directly to the ILEC's network without an intermediate point of interconnection?

Position: The ALEC collocation site is the appropriate demarcation point. The ALEC should have the option to use or not use an intermediate point of interconnection. (Closz)

Issue 10: What are reasonable parameters for reserving space for future ILEC and ALEC use?

Position: FCC Rule 51.323 (f) (4)–(6) establishes guidelines to be used in the reservation of space for future use. The rules allow an ILEC to retain a limited amount of floor space for its own future use, provided that the ILEC may not reserve space for future use on terms more favorable than those that apply to other telecommunications carriers seeking to reserve space for their own future use. In addition, the rules require an ILEC to relinquish space held for future use before denying a request for virtual collocation space due to insufficient space. The FCC rules also allow an ILEC to impose reasonable restrictions on the warehousing of unused space by collocating carriers.

In addition to the FCC requirements, the FPSC should adopt additional requirements relating to the reservation of space for future use. The FPSC should limit ILEC reservation of space to one year. Prior to denying an application for physical collocation, the ILEC should be required to justify the reserved space based on a demand and facility forecast. The demand and facility forecast must include at least three to five years of historical data and

forecasted growth by functional type of equipment. Similarly, the FPSC should limit ALEC reservation of space at no charge to one year. If collocation space requests exceed available space within a particular office, an ALEC should be required to relinquish the reserved space or begin paying the appropriate collocation charge for the space. Then, the ALEC should be required to occupy the reserved space within six months of beginning to pay the appropriate charges or relinquish the space if the ILEC has outstanding ALEC requests for space. (Hunsucker)

Issue 11: Can generic parameters be established for the use of administrative office space by an ILEC, when the ILEC maintains that there is insufficient space for physical collocation? If so, what are they?

Position: Yes, generic guidelines should be established to promote the availability of space for competitive purposes. ILECs should be required to relocate administrative office personnel before denying physical collocation requests. Administrative office personnel should be defined as personnel that are not essential to the function of a particular premise. ILECs should have the flexibility to relocate only enough personnel to accommodate the ALEC space request or any amount above the ALEC request if the ILEC deems it necessary to

relocate an entire workgroup. ILECs should be required to apportion the relocation costs to the ALEC as the percentage of ALEC square footage to total square footage relocated. (Hunsucker)

Issue 12: What types of equipment are the ILECs obligated to allow in a physical collocation arrangement?

Position: Pursuant to FCC Rule 51.323 (b), an ILEC shall permit the collocation of any type of equipment used for interconnection or access to unbundled network elements. Such equipment includes, but is not limited to, transmission equipment, optical terminating equipment and multiplexers, equipment collocated to terminate basic transmission facilities, digital subscriber line access multiplexers ("DSLAMS"), routers, asynchronous transfer mode multiplexers ("ATMs") and remote switching modules. (Hunsucker, Cloz)

Issue 13: If space is available, should the ILEC be required to provide price quotes to an ALEC prior to receiving a firm order for space in a central office (CO)?

(A) If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from that ALEC, when should the quote be provided?

(B) If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from that ALEC, should the quote provide detailed costs?

Position: The ILEC should accept a firm offer at any time in the process after receiving an application and determining that space is available. The ALEC may decide that it is necessary for the ILEC to provide price quotes prior to the ALEC's placement of a firm order. Such price quotes should be provided no later than 30 calendar days after receipt of a collocation application. (Closz)

Issue 14: Should an ALEC have the option to participate in the development of the ILEC's price quote, and if so, what time frames should apply?

Position: ALECs should have the option to participate in the ILEC's development of a price quote only to the extent of providing specific requests or development parameters along with the collocation request. Sprint believes that ILEC tariffing of collocation prices would not only expedite the price quote process, but would give ALEC's much greater certainty with respect to anticipated collocation costs.

(Closz)

Issue 15: Should an ALEC be permitted to hire an ILEC certified contractor to perform space preparation, racking and cabling, and power work?

Position: Yes. The certification process used by the ILEC should be the same process as the ILEC uses for approving contractors for its own purposes. In no instance should the ILEC certification process unduly delay collocation work completion. (Closz)

Issue 16: For what reasons, if any, should the provisioning intervals be extended without the need for an agreement by the applicant ALEC or filing by the ILEC of a request for an extension of time?

Position: There are no reasons that should provide the ILEC with an opportunity to unilaterally extend collocation provisioning intervals. (Closz)

Issue 17: How should the costs of security arrangements, site preparation, collocation space reports, and other costs necessary to the provisioning of collocation space, be allocated between multiple carriers?

Position: Sprint proposes that the costs of implementing reasonable security measures should be shared by both the ALEC and the ILEC and that the cost sharing methodology should be based on relative square footage as an appropriate estimator of the value of the equipment being protected. Sprint proposes that the FPSC adopt the same methodology that the FCC codified regarding cageless collocation, i.e., a methodology that allocates space preparation charges on the basis of relative square footage, for space preparation costs associated with any method of collocation. Sprint suggests that the costs for collocation space reports be recovered via a non-recurring

charge to be assessed at the time of the request for a report. For other collocation charges, Sprint suggests that, in general, if the costs are associated with general building modifications that benefit the whole location, the costs should be recovered from all carriers located on the premises on a relative square footage basis. If modifications are made for ALECs only, then the charges should be assessed to ALECs only on the basis of relative square footage (or 100% if the modifications make improvements relative to a specific ALEC request). (Hunsucker)

Issue 18: If insufficient space is available to satisfy the collocation request, should the ILEC be required to advise the ALEC as to what space is available?

Position: Yes. FCC Rule 51.231 (h) requires an ILEC to provide a requesting carrier, within ten days of a request, with a report indicating the ILEC's available collocation space in a particular ILEC's premises. In addition, a dialogue should be created between the ILEC and the ALEC to explore options that are specifically relevant to that ALEC's request, within the established time frames for responding to a collocation application. (Closz)

Issue 19: If an ILEC has been granted a waiver from the physical collocation requirements for a particular CO, and the ILEC later makes modifications that create space that would be appropriate for collocation, when should the ILEC be required to inform the Commission and any requesting ALECs of the availability of space in that office?

Position: The ILEC should initially inform the Commission and the ALECs at the time a decision is made to make any modification to increase the availability of space. Subsequently, the ILEC should provide a project plan and expected timeline of when the space will be available and should provide progress reports every 30 days to the Commission and ALECs who requested space, as to the current status. Alternatively, the information could be placed on an Internet web site. (Hunsucker)

Issue 20: What process, if any, should be established for forecasting collocation demand for CO additions or expansions?

Position: Sprint proposes that ALECs should be required to provide an annual forecast (for a three year period) of space requirements by premises as part of the Joint Operations Plan developed jointly by the ILEC and ALEC. In addition,

the ILEC should be required to make reasonable estimates of additional ALEC space requirements for those ALECs not currently covered by a contract.

(Hunsucker)

Issue 21: Applying the "first-come, first-served" rule, if space becomes available in a central office because a waiver is denied or a modification is made, who should be given priority?

Position: ALECs should be given priority based on the date of their respective collocation applications. If space is exhausted, the ILEC must maintain a list of all pending requests in a wait list mode based on the collocation application date. The ILEC must notify the ALECs on the waiting list within ten days of space becoming available. ALECs shall have ten days to respond to the notification. ALECs must reaffirm their collocation request every 180 days to remain in their original place on the waiting list. (Hunsucker)

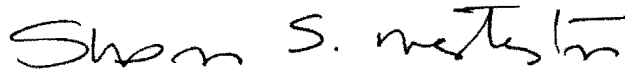
G. STIPULATIONS: Sprint is not aware of any issues that have been stipulated at this time.

H. PENDING MOTIONS: There is still pending the Motion to Accept

Testimony of Mike Hunsucker One Day Out of Time.

I. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURES: There is no requirement set forth in Order No. PSC 99-1991-PCO-TP with which Sprint cannot comply.

Respectfully submitted this 19th day of November 1999.



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CERTIFICATE OF SERVICE
DOCKET NOS. 981834-TP & 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 19th day of November, 1999 to the following:

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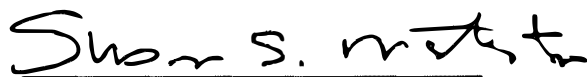
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