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RECORDS AND REPORTING

November 29, 1999

BY HAND DELIVERY

ORIGINAL

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. 990649-TP

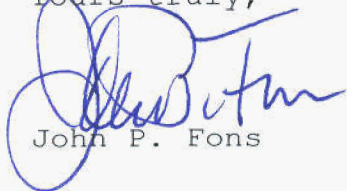
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Response to Joint Motion of GTE and BellSouth to Strike the Surrebuttal Testimony of Don J. Wood on Behalf of AT&T and MCI.

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.

Yours truly,



John P. Fons

- AFA _____
- APP _____
- CAF _____
- GMU 2 _____
- CTR _____
- EAG _____
- LEG 2 _____
- MAS 5 _____
- OPC _____
- PAJ _____
- SEC 1 _____
- WAW _____
- OTH _____

Enclosures

cc: All parties of record

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DOCUMENT NUMBER-DATE

14555 NOV 29 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
pricing of unbundled network
elements

DOCKET NO. 990649-TP
FILED: November 29, 1999

**SPRINT'S RESPONSE TO JOINT MOTION OF GTE AND
BELLSOUTH TO STRIKE THE SURREBUTTAL TESTIMONY
OF DON J. WOOD ON BEHALF OF AT&T AND MCI**

Pursuant to Rule 28-106.204(1), Uniform Rules of Procedure, Florida Administrative Code, Sprint-Florida, Inc. and Sprint Communications Company, Limited Partnership (collectively "Sprint") hereby respond to the Joint Motion of GTE Florida Incorporated ("GTE") and BellSouth Telecommunications, Inc. ("BellSouth") to Strike the Surrebuttal Testimony of Don J. Wood on behalf of AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. ("MCI") ("Joint Motion"), stating as follows:

1. Sprint supports the Joint Motion.
2. Sprint agrees with GTE and BellSouth that the testimony filed by Don J. Wood is not, in fact, surrebuttal testimony. It is, instead, direct testimony which, according to its own terms, simply augments the previous direct testimony of AT&T and MCI's witness Dr. Ankum.
3. Under the procedures previously adopted by the Commission, the parties are not entitled to submit testimony

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in response to surrebuttal testimony. The considerable detail (i.e., input values) included in Mr. Wood's testimony requires responsive testimony. Not having the opportunity to file responsive testimony strikes at the very heart of Sprint's procedural due process rights. If the Commission denies the Joint Motion, then Sprint and the other parties should be allowed the right to file responsive testimony.

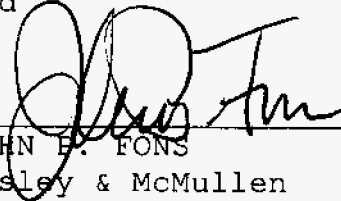
4. However, rather than introducing additional, unnecessary complexity to this proceeding at this late date, which would, for due process purposes, require another round of responsive testimony, Sprint suggests that the Commission strike Mr. Wood's surrebuttal testimony with leave for AT&T and MCI to re-file it in the next phase of this proceeding. AT&T and MCI will not be harmed or disadvantaged by such a procedure since Mr. Wood's testimony is not necessary to the Commission's resolution of issues in this phase of the proceeding.

DATED this 29th day of November, 1999.

Respectfully submitted,

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and



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 29th day of November, 1999, to the following:

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