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RECORDS AND REPORTING
December 6, 2009

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 and 990321-TP

Dear Ms. Bayo:

Enclosed for filing in the above dockets are the original and fifteen (15) copies of Sprint's Motion to Accept Supplemental Rebuttal Testimony of Michael R. Hunsucker.

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

Thank you for your assistance in this matter.

Sincerely,

Susan S. Masterton

Susan S. Masterton

Enclosures

cc: Parties of Record

- AFA _____
- APP _____
- CAF _____
- CAU _____
- CTR _____
- EAG _____
- LEG 2
- MAD 3
- OPG _____
- RTR _____
- SEC 1
- VAW _____
- OTH _____

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Blanca S. Bayo
DOCUMENT NUMBER-DATE

14889 DEC-6 09

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & DOCKET NO. 990321-TP

I HEREBY CERTIFY that a true and correct copy of the Motion To Accept Supplemental Rebuttal Testimony of Michael R. Hunsucker, was served by Over-night mail this 6th day of December, 1999 or hand-delivery on the 7th day of December, 1999 to the following:

Nancy B. White *
C/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street Suite 400
Tallahassee, Florida 32301-1556
Covad Communications Company
Christopher V. Goodpaster
9600 Great Hills Trail, Suite 150W
Austin, TX 78759

Rythms Links Inc. *
Hopping Law Firm
Rick Melson
Post Office Box 6526
Tallahassee, Florida 32314

Pennington Law Firm *
Peter Dunbar/Marc W. Dunbar
Post Office Box 10095
Tallahassee, Florida 32302

Florida Cable Telecommunications *
Association, Incorporated
Michael A. Gross
310 North Monroe Street
Tallahassee, Florida 32301
GTE Florida Incorporated *
Ms. Beverly Menard
c/o Margo B. Hammar
106 East College Avenue, Suite 810
Tallahassee, Florida 32301

Intermedia Communications
Scott Sappersteinn
3625 Queen Palm Drive
Tampa, Florida 33619-1309

Time Warner Telecom
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Blumemfeld & Cohen
Elise Kiely/Jeffrey Blumemfeld
1625 Massachusetts Ave NW
Washington, DC 20036

CompTel
Terry Monroe
1900 M Street, NW,
Suite 800
Washington, DC 20036

FCCA *
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, Florida 32301

Intermedia *
Wiggins Law Firm
Charlie Pellegrini/Patrick Wiggins
Post Office Drawer 1657
Tallahassee, Florida 32302

WorldCom Technologies, Inc. *
& MCI Metro Access Transmission
Donna McNulty
325 John Knox Road
Tallahassee, Florida 32302

Supra Telecommunications &
Information Systems, Inc.
Mark Buechele
2620 S.W. 27th Avenue
Miami, Florida 33133-3001

AT&T Communications of the *
Southern States, Inc.
Ms. Rhonda P. Merritt
101 North Monroe Street, Suite #700
Tallahassee, Florida 32301-1549

e.spire Communications, Inc.
James Falvey
133 National Business Parkway
Suite 200
Annapolis Junction, MD 20701
Florida Public *
Telecommunications Association
Angela Green, General Counsel
125 S. Gadsden Street, Suite 200
Tallahassee, Florida 32301-1525

MediaOne Florida *
Telecommunications, Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, Florida 32301

MGC Communications, Inc.
Marilyn Ash
3301 North Buffalo Drive
Las Vegas, NV 89129

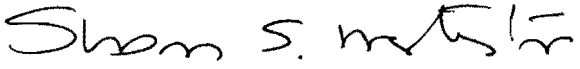
TCG South Florida *
c/o Rutledge Law Firm
Kenneth Hoffman
Post Office Box 551
Tallahassee, Florida 32302-0551

Telecommunications Resellers Assoc.

Andrew Isar

3220 Uddenberg Lane, Suite 4

Gig Harbor, WA 98335

A handwritten signature in black ink that reads "Susan S. Masterton". The signature is written in a cursive style with a horizontal line underneath it.

Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP
Filed: December 6, 1999

MOTION TO ACCEPT SUPPLEMENTAL REBUTTAL TESTIMONY OF
MICHAEL R. HUNSUCKER

COMES NOW, Sprint and files this Motion requesting that the Commission allow Supplemental Rebuttal Testimony of Michael R. Hunsucker to be filed. In support, Sprint states as follows:

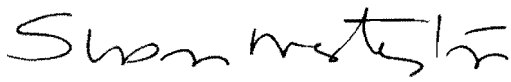
Sprint requests that the Commission accept the Supplemental Rebuttal Testimony of Michael R. Hunsucker. The Order on Prehearing procedure required that Direct Testimony be filed with the Commission and served on the Parties on Thursday October 28, 1999. Rebuttal Testimony was required to be filed with the Commission on Friday November 19, 1999. GTE filed its original direct testimony on October 28, 1999 and Sprint prepared its rebuttal testimony based on that filing. Subsequently, on November 16, 1999, GTE submitted Revised Direct Testimony, which substantially and materially altered the testimony of John W. Ries relating to Issues 1, 13 & 17. Sprint was unable to revise its Rebuttal Testimony prepared in response to GTE's original filing in time to meet the November 19, 1999 deadline. Sprint files this supplement to Michael R. Hunsucker's Rebuttal Testimony to address issues raised by GTE's Revised Direct Testimony. To the extent that any testimony contained in Michael R. Hunsucker's original rebuttal testimony is no longer relevant due to GTE's revised filing, Sprint withdraws such testimony.

Due to the time frame and the need to complete the filing, counsel has not has not contacted other parties regarding concurrence with this motion. Sprint submits that this filing will not prejudice the interests of any of the parties in this proceeding and that the interests of justice will be served if Sprint's supplemental testimony is considered in the public interest determinations of this docket.

WHEREFORE, for the above reasons, Sprint request that the Commission accept for filing the Supplemental Rebuttal Testimony of Michael R. Hunsucker.

RESPECTFULLY SUBMITTED this 6th day of December 1999.

Sincerely,



Charles J. Rehwinkel
Susan Masterton
P.O. Box 2214
MC FLTLHO0107
Tallahassee, Florida 3230-2214