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RECORDS AND  
REPORTING

Via Hand Delivery

May 15, 2000

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 990649-TP; Sprint's Supplemental Direct Testimony.

Dear Ms. Bayó:

Enclosed with this letter is the original and 15 copies of the Supplemental Direct testimony of Sprint witnesses James W. Sichter, John A. Holmes, and Steven McMahon. Also included are revised Exhibits SMM-3, SMM-4 & SMM-5; JWS-10; and JAH-2.

Though entitled "supplemental", this testimony is intended to provide a correction to the testimony previously filed on May 1, 2000. The correction is necessitated due to an omission in the Loop Qualification Non-recurring Cost (NRC) study submitted on the same date. Sprint is also enclosing for filing a diskette containing an electronic copy of the revisions made to the NRC study. The testimony and revised NRC study was also transmitted electronically to all parties on May 12, 2000 with instructions for inserting the omitted cost information. Service of the Supplemental Direct testimony is being made on all parties pursuant to the attached certificate of service.

In addition Sprint is filing a Motion to Accept Supplemental Direct Testimony. An original and seven (7) copies of the Motion are enclosed.

Please indicate filing by stamping a copy of this letter and returning same to the undersigned.

Sincerely,

Charles J. Rehwinkel

Enclosure

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- MAS 5/15/00
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC I
- WAV \_\_\_\_\_
- OTH \_\_\_\_\_

*Motion*  
DOCUMENT NUMBER-DATE  
**05990 MAY 15 8**  
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*Testimony*  
DOCUMENT NUMBER-DATE  
**05991 MAY 15 8**  
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CERTIFICATE OF SERVICE  
DOCKET NO. 990649-TP

I HEREBY CERTIFY that a true and correct copy of the Request for Confidentiality Classification was served by U.S. Mail on the 15<sup>th</sup> day of May, 2000 to the following:

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A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", written over a horizontal line.

Charles J. Rehwinkel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing )  
of unbundled network elements. )

Docket No. 990649-TP

Filed: May 15, 2000

MOTION TO ACCEPT SUPPLEMENTAL DIRECT TESTIMONY

Sprint-Florida, Incorporated (Sprint), by and through its undersigned attorneys, hereby requests that the Florida Public Service Commission allow the filing of the supplemental Direct testimony of JAMES W. SICHTER, STEVEN M. MCMAHON, and JOHN A. HOLMES, including revisions to certain exhibits to their prefiled Direct testimony. In support of the Motion Sprint states as follows:

1. Order No. PSC-00-0540-PCO-TP, issued March 16, 2000, ("Order") required Sprint to file direct testimony on May 1, 2000. Sprint filed direct testimony, including of that of James W. Sichter, Steven M. McMahon, and John A. Holmes, along with certain recurring and non-recurring cost (NRC) studies. Sprint previously filed the other required cost studies on April 17, 2000. In the course

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of reviewing the studies, Sprint discovered that the Loop Qualification NRC study omitted a necessary work function. Sprint has corrected the oversight resulting in slight changes to the testimony and the exhibits (SMM-3, SMM-4 & SMM-5; JWS-10; and JAH-2) sponsored by these witnesses. Sprint believes that it is appropriate to make such corrections in the interest of establishing the most reasonable assessment of Sprints costs in this proceeding. It is for this reason that the corrections are being made.

2. Sprint submits that the interests of justice would be served by allowing the filing of this supplemental testimony. Filing at a later time would be more prejudicial to the Commission and other parties. Rather than “spring” this information at the time of the hearing or in later discovery, Sprint is seeking to inform the Commission staff and parties so that it may be useful in their analysis. The revisions were sent via e-mail to all parties on Friday, May 12.

3. Sprint does not believe that any party will be harmed by this supplemental filing and suggests that filing at this stage of the case may even be beneficial.

WHEREFORE, for the above stated reasons, Sprint submits that this Motion should be granted and the supplemental Direct testimony of JAMES W. SICHTER, STEVEN M. MCMAHON, and JOHN A. HOLMES, including revision to Exhibits SMM-3, SMM-4 & SMM-5; JWS-10; and JAH-2, should be allowed.

DATED this 15<sup>th</sup> day of May, 2000.

Respectfully submitted,



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and

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