

ORIGINAL

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May 26, 2000

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Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
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Tallahassee, Florida 32399-0850

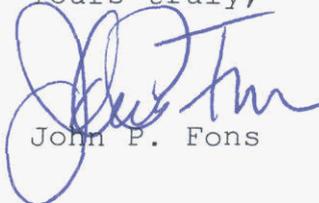
Re: Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Response in Support of AT&T's Motion for Continuance of Hearing.

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.

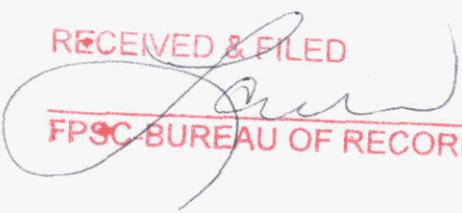
Yours truly,  
  
John P. Fons

Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP 5
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RG0 \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

cc: All parties of record

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06527 MAY 26 8  
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing ) Docket No. 990649-TP  
of unbundled network elements ) Filed: May 26, 2000  
\_\_\_\_\_ )

**SPRINT'S RESPONSE IN SUPPORT OF AT&T'S  
MOTION FOR CONTINUANCE OF HEARING**

Sprint-Florida, Incorporated (Sprint), by and through its undersigned attorneys, pursuant to Rule 28-106.303(1), Florida Administrative Code, hereby responds in support of AT&T's Motion for Continuance of Hearing ("AT&T's Motion"), stating as follows:

1. It is undisputed that the ability to replicate the results of BellSouth's Cost Model included in its testimony is central to the parties' ability to prepare rebuttal testimony and to prepare for hearings. To date, that ability to replicate has been stifled by problems with the BellSouth new Cost Model.

2. Additionally, because of the extensive amount of time being spent in trying to understand and operate BellSouth's new Cost Model, the parties have had to direct resources to that futile effort and away from other significant issues; e.g., non-recurring charges, structure inputs, deaveraging, etc. Consequently, Sprint, as well as the other parties, are not in a position to file adequate rebuttal testimony or to prepare for

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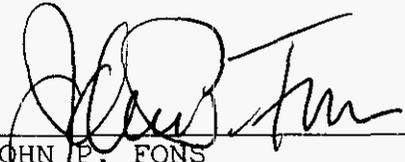
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the July hearings. The parties, including BellSouth, have been working as hard as possible to meet the Commission-ordered timeframes. Perhaps those timeframes were too ambitious to begin with, but with the fundamental difficulties with BellSouth's Cost Model, those timeframes are now totally unrealistic.

WHEREFORE, Sprint supports AT&T's Motion and respectfully requests that the Commission grant AT&T's Motion.

DATED this 26<sup>th</sup> day of May, 2000.

Respectfully submitted,



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ATTORNEYS FOR SPRINT-FLORIDA,  
INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (\*) this 26<sup>th</sup> day of May, 2000, to the following:

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