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RECORDS AND REPORTING

ORIGINAL

June 26, 2000

BY HAND DELIVERY

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

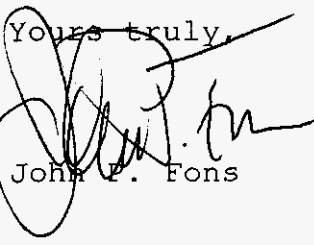
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Phase I Prehearing Statement.

We are also submitting the Prehearing Statement on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

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

- APP _____
- CAF _____
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- CTR _____
- ECR _____
- LEG 2
- OPC _____
- PAI _____
- RG0 _____
- SEC 1
- SER _____
- OTH _____

Enclosures
cc: All parties of record
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DOCUMENT NUMBER-DATE

07743 JUN 26 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
pricing of unbundled network
elements

DOCKET NO. 990649-TP
FILED: 6/26/00

ORIGINAL

SPRINT'S PHASE I PREHEARING STATEMENT

Sprint Communications Company, Limited Partnership and Sprint-Florida, Incorporated (collectively "Sprint"), pursuant to Order No. PSC-00-2015-TP, submits the following Phase I Prehearing Statement.

A. WITNESS: In Phase I of this proceeding, Sprint will sponsor the direct testimony of James W. Sichter, Kent W. Dickerson, John D. Quackenbush and John A. Holmes. These witnesses will testify on issues 5, 6, 7b, 7c, 7d, 9b and 13.

B. EXHIBITS: Sprint's witness, John D. Quackenbush, has 14 exhibits applicable to Phase I of this proceeding; namely, Exhibits JDQ-1 through JDQ-14 attached to his direct testimony; Sprint's witness Kent W. Dickerson has one exhibit applicable to Phase I of this proceeding; namely, KWD-1; Sprint's witness James W. Sichter, has 3 exhibits applicable to Phase I of this proceeding; namely, Exhibits 1, 10 and 11.

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07743 JUN 26 8
FPSC-RECORDS/REPORTING

C. BASIC POSITION:

Phase I of this proceeding addresses just a handful of the dozens of issues actually in the proceeding. Nevertheless, the Commission should make certain, even in this limited proceeding, that one essential policy consideration is not overlooked; namely, whatever policies the Commission adopts in this proceeding, those policies must be applied uniformly and equally to all ILECs.

D-G. ISSUES AND POSITIONS:

Issue 5: For which signaling networks and call-related databases should rates be set?

Position: Sprint proposes UNE rates for the following signaling networks and call-related database items:

- common channel signaling (including STP Ports and STP Switching (SS7 Interconnection))
- Database Query Services
- 911/E911

(Holmes)

Issue 6: Under what circumstances, if any, is it appropriate to recover non-recurring costs through recurring rates?

Position: Absent compelling circumstances (i.e., evidence that high non-recurring charges are a barrier to entry), Sprint

believes that non-recurring costs should be recovered through non-recurring rates. (Sichter)

Issue 7: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking recurring UNE cost studies?

- b) depreciation;
- c) cost of capital;
- d) tax rates.

Position:

- b) Sprint has adopted for this proceeding the depreciation lives ordered by the Florida Public Service Commission in the Universal Service Fund Docket No. 990696-TP. (Dickerson)
- c) Using the weighted market value cost of capital for Sprint-Florida, the cost of capital is 13.19% based upon the market value capital structure of 10.36% debt and 89.64% common equity. (Quackenbush)
- d) Sprint's filing utilizes the federal and state income tax and state ad valorem tax rates currently in effect in Florida. (Dickerson)

Issue 9(b): Subject to the standards of the FCC's Third Report and Order, should the Commission require ILECs to unbundle any other elements or combinations of elements? If so, what are they and how should they be priced?

Position: This proceeding does not address the pricing of two network elements the Federal Communications Commission determined should be unbundled; namely, "line sharing" and Operational Support Systems (OSS). Sprint understands these two network elements will be addresses in separate proceedings.
(Sichter)

Issue 13: When should the recurring and non-recurring rates and charges take effect?

Position: Sprint recommends that any UNE rates ordered in this proceeding should be filed 60 days after the release of the Commission Order. (Sichter)

H. STIPULATIONS: Sprint is not aware of any pending stipulations at this time.

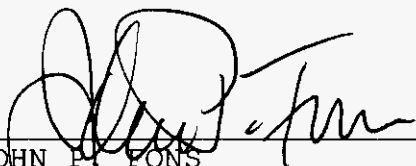
I. PENDING MOTIONS: Sprint is not aware of any pending motions at this time.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: Sprint does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 26th day of June, 2000.

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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 26th day of June 2000, to the following:

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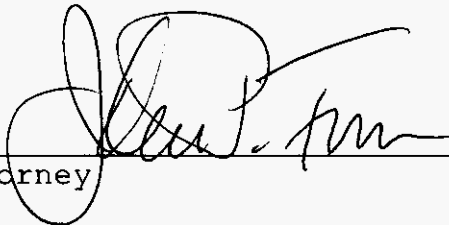
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