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August 8, 2000

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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

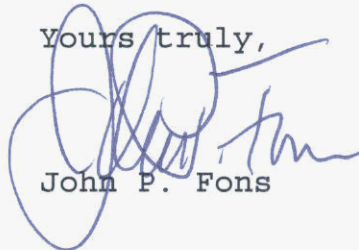
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Reply to BellSouth's Response.

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

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Enclosures
cc: All parties of record
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DOCUMENT NUMBER-DATE

09574 AUG-88

FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
pricing of unbundled network
elements

DOCKET NO. 990649-TP
FILED: August 8, 2000

SPRINT'S REPLY TO BELL SOUTH'S RESPONSE

Sprint-Florida, Incorporated ("Sprint-Florida") and Sprint Communications Company Limited Partnership ("Sprint"), hereby submit their reply to BellSouth Telecommunication, Inc's ("BellSouth") Response to Motion to Bifurcate and Suspend proceedings ("BellSouth's Response") stating as follows:

1. Although BellSouth does not object to Sprint-Florida's Motion to Bifurcate and Continue Proceeding, BellSouth expresses concern about "Sprint's apparent desire to bifurcate the proceeding, but at the same time participate in the BellSouth proceeding in order to challenge BellSouth's cost studies" (BellSouth's Response, p.2). BellSouth then contends that because "Sprint's challenge is based, at least in part, upon Sprint's own cost studies . . ." the Commission should make clear that "any testimony referring to Sprint's cost studies will be stricken in the event that Sprint's motion for a continuance is granted." (BellSouth's Response, p.2 (emphasis added). BellSouth's contention and its proposed procedure is unwarranted.

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2. BellSouth's Response fails to identify any portions of Sprint's testimony challenging BellSouth's cost study that rely upon Sprint's cost study. Moreover, BellSouth's contention, that Sprint's rationale for seeking bifurcation and continuance is dependent upon Sprint's inability to "defend its cost studies," is a gross mischaracterization of Sprint's rationale. What Sprint cannot now defend is the "hypothetical network" aspect of its TELRIC study, and nothing more. The fact that Sprint's cost study is a TELRIC study in no way lessens the accuracy and quality of Sprint's cost study inputs when those inputs are not driven by a "hypothetical network." To the extent Sprint's testimony and exhibits rely upon the inputs Sprint developed in conducting its cost study to challenge BellSouth's cost study, those inputs should remain valid and defensible unless it can be shown that the inputs are "hypothetical network" based.

3. The fact that Sprint's testimony challenging BellSouth's cost study results merely "refer" to Sprint's cost study should be no basis for striking that testimony. There should, at the very least be a demonstration that the testimony is based upon the "hypothetical network" aspect of the now vacated FCC rules before it would be rejected. No such demonstration has been made or even attempted.

4. The foregoing notwithstanding, Sprint is in the process of reviewing each of its testimonies challenging BellSouth's cost


study inputs and results, to determine whether and to what extent such testimonies need to be revised to reflect Sprint's withdrawal of its cost studies. If Sprint's Motion to Bifurcate and for continuance is granted, Sprint requests leave to refile its recently filed rebuttal testimony to the extent necessary. If leave is granted, Sprint will refile its rebuttal testimony by close of business on Monday, August 14, 2000. This should provide BellSouth adequate time to respond to Sprint's refiled rebuttal. BellSouth already knows - by virtue of Sprint's rebuttal testimony filed on July 21, 2000 - the areas which Sprint is challenging. Sprint will not be adding any new areas in its filing.

DATED this 8th day of August, 2000.

Respectfully submitted,

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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 8th day of August, 2000, to the following:

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