

SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

2000 ALEC Data Request

ORIGINAL

000000-PU

1. a. Are you providing service to residential customers in Florida that complies with the above definition of basic service?

RESPONSE: Sprint Communications Company Limited Partnership does not serve residential customers in Florida at this time.

b. To how many residential customers are you providing basic local service in Florida?

RESPONSE: Not applicable.

c. What are your current rates for providing residential basic local service?

RESPONSE: Not applicable.

d. Are you providing service to business customers in Florida that complies with the above definition of basic local service?

RESPONSE: Sprint Communications Company Limited Partnership does not provide basic local service to business customers in Florida at this time.

e. To how many business customers are you providing basic local service in Florida?

RESPONSE: None for single-line basic local service.

f. What are your current rates for providing business basic local service in Florida?

RESPONSE: Not applicable.

2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of basic local service? (Examples could include: multi-line business users; services with toll restriction or usage; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc.)
(If yes, continue with question #2; if no, skip to Question #3)

RESPONSE: Yes

a. Are you currently providing other forms of local service to residential customers in Florida?

RESPONSE: No.

b. If the response to a. is affirmative, please describe the forms of local service you are providing to residential customers in Florida. (If available, please provide brochures or comparable materials.)

RESPONSE: Not applicable

c. If the response to a. is affirmative, please indicate your current rates for the services indicated in response to b.

APP _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
LEG _____
OPC _____
PAI _____
RGO _____
SEC _____
SER _____
OTH _____

DOCUMENT NUMBER-DATE

09707 AUG 10 8

FPSC-RECORDS/REPORTING

RESPONSE: Not applicable

- d. Are you currently providing other forms of local service to business customers in Florida?

RESPONSE: Yes

- e. If the response to d. is affirmative, please describe the forms of local service you are providing to business customers in Florida. (If available, please provide brochures or comparable materials.)

RESPONSE: Sprint provides local service to customers based on their volume driven business needs. These needs may lead them to request multi-lines, DS1, or ISDN services.

- f. If the response to d. is affirmative. Please indicate your current standard rates for the services indicated in response to e.

RESPONSE:

[REDACTED] This information is proprietary.

3. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.)

RESPONSE: Sprint is providing service via unbundled network elements as well as by its own facilities. Sprint is using its own central office switch and, where accessible, Sprint-owned fiber optic facilities.

- a. Please indicate, by exchange, the number of LEC access lines you are reselling to residential customers.

RESPONSE: [REDACTED] (Proprietary)

- b. Please indicate, by exchange, the number of LEC access lines you are reselling to business customers.

RESPONSE: [REDACTED] (Proprietary)

- c. Please indicate, by exchange, the types of unbundled network elements, if any, you are obtaining from the incumbent LEC.

RESPONSE: (Proprietary)

[REDACTED]

- d. Please indicate, by exchange, the number of unbundled local loops, if any, you are obtaining from the incumbent LEC.

RESPONSE: [REDACTED] (Proprietary)

- e. Please indicate the types of facilities deployed by your company in Florida to provide local telephone services, and indicate where these facilities are deployed.

RESPONSE: [REDACTED] (Proprietary)

- f. If known, please indicate the number of access lines, separately for residential and business customers, provisioned solely over company-owned facilities.

RESPONSE: Zero for Residential and [REDACTED] for Business. (Proprietary)

- g. Please indicate, by exchange, the number of business access lines you serve that are provided to internet service providers.

RESPONSE: [REDACTED] (Proprietary)

- h. Please indicate, by exchange, the number of business access lines you serve that are provided to voicemail service providers.

RESPONSE: [REDACTED] (Proprietary)

4. Please indicate the number and location of switches you have located in Florida, if any, used to provide services to customers in Florida.

RESPONSE: [REDACTED] (Proprietary)

5. For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchanges is attached), the number of residential access lines served as of June 30, 2000.

RESPONSE: Not applicable.

6. For each exchange where you are providing any form of business local telephone services, please identify by exchange (a list of exchanges is attached), the number of business access lines served as of June 30, 2000.

RESPONSE: [REDACTED] exchange: [REDACTED] business lines. (Proprietary)

7. For billing and accounting purposes, do you differentiate between residential and business customers?

RESPONSE: Not applicable.

- a. Are you currently offering any enhanced services? If yes, what are they?

RESPONSE: Not applicable

- b. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.

RESPONSE: Sprint has encountered several significant barriers in entering Florida's local exchange Markets. The top three are summarized as follows:

- 1) Cumbersome ordering and provisioning process for unbundled network elements. The process for purchasing unbundled network elements continues to be mostly a manual, labor intensive and administratively burdensome process.
- 2) Installation intervals are a significant competitive challenge for a facilities based ALEC who also purchases unbundled network elements from an ILEC. Currently BellSouth provides an interval for unbundled loops which is 5 days from receipt of an order. Yet, they will commit to a 2 or 3 day timeframe for their retail customers. When you add any time for the ALEC to process the order, a simple one line addition takes at least 7 days rather than the 2 or 3 days being provided by BellSouth to its retail customers. Considering further that BellSouth is provisioning the switch and cable facilities for its existing business customers in 2 or 3 days, it is unacceptable to the ALEC that they be allowed 5 days to provision only the cable facility for the ALEC. Simply acknowledging receipt of the ALEC's order is 2 days.
- 3) Obtaining the ability to connect Sprint's fiber facilities to multi-tenant buildings in order to serve customers has been a significant barrier to competition. While the property owners discuss many concerns on protecting their private property rights and the challenge of allowing multiple vendors into their buildings, Sprint's experience is that it is more often a question of compensation rather than property concerns. Sprint has attempted to negotiate acceptable fees to reimburse the property owners for their administrative and infrastructure concerns and found most property owners more interested in obtaining a share of the telecommunications company's revenue than they are in recovering their administrative and infrastructure costs.

c. [No question asked for 7.c]

d. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.

RESPONSE: Sprint is currently involved in a dispute with BellSouth for their failure to live up to their obligation to pay reciprocal compensation on terminating traffic as stated in our interconnection agreement. BellSouth is refusing to pay reciprocal compensation on ISP terminating traffic.

e. Do you anticipate that your long-term manner of providing service will differ from your current practice? If so, do you expect becoming a full scale facilities-based provider?

RESPONSE: Sprint is currently a full scale facilities-based provider.

f. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned and for each code, as of January 31, 2000, how many numbers have been assigned from the code?

RESPONSE:



(Proprietary)

8. If you are not currently providing local telephone service in Florida:

- a. Please explain why you are not providing local telephone service. For example: have you experienced marketing or billing difficulties? Lack of capital? Customers are not willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the LECs? Insufficient profit margin?

RESPONSE: Not applicable

- b. Do you anticipate providing local telephone service as some future date? If yes, please indicate when. (e.g., first quarter 2000)

RESPONSE: Not applicable

- c. Please describe the most important factors that you believe are inhibiting your ability to provide local telephone service, and describe how these factors have adversely affected your entry.

RESPONSE: Not applicable

- d. Are you currently providing any other telecommunications services in Florida (i.e., other than local service)? If yes, please list the services provided.

RESPONSE: Not applicable

9. Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange service, local service, cellular service, paging service, electric service, municipality, etc.)

RESPONSE: Local Service.

10. At any time during the last 12 months, have you provided local telephone services in Florida and then withdrawn the service? If yes, please discuss the reasons for this decision.

RESPONSE: No.

11. If you or an affiliate provides cable television in Florida, do you offer any package plans combining cable television and local telephone services? If so, please indicate where such packages are being offered.

RESPONSE: Not applicable.

12. If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans and their terms and conditions. Is subscribing to both local telephone and long distance a condition of providing service?

RESPONSE: No.

13. If you or an affiliate's primary business is unrelated to the provision of telecommunications, please indicate the nature of such primary business(es). Examples of such businesses could include, but are not limited to: pawn shops, title loan companies, alternative automobile financing, internet service providers, or check cashing services.

RESPONSE: Not Applicable

14. Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.

RESPONSE: The Commission should continue to work toward implementing measurements for ILEC service to CLECs similar to the service measurements in place today for the ILECs' performance to their retail customers. These would deal with such issues as installation intervals, repair responsiveness and loop availability.

15. Please describe any actions available to the Florida legislature which you believe should be taken to foster local exchange competitive market entry.

RESPONSE: Obtaining the ability to connect Sprint's fiber facilities to multi-tenant buildings in order to serve customers has been a significant barrier to competition. While the property owners discuss many concerns on protecting their private property rights and the challenge of allowing multiple vendors into their buildings, Sprint's experience is that it is more often a question of compensation rather than property concerns. Sprint has attempted to negotiate acceptable fees to reimburse the property owners for their administrative and infrastructure concerns and found most property owners more interested in obtaining a share of the telecommunications company's revenue than they are in recovering their administrative and infrastructure costs. Sprint believes that it will require legislative action to develop a consistent and competitive approach to building entry.

16. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.

RESPONSE: As a competitive provider, Sprint is very concerned about the proposed application of billing format and bill blocking rules to CLECs. Sprint recognizes that customers want bills that are easier to read and which give them adequate information to make intelligent choices in an increasingly competitive environment, and Sprint's ILEC operations, at considerable expense, revised its customer bills. Sprint is concerned that the proposed amendments to the FPSC's billing rules will constitute a barrier to competition by CLECs. Sprint believes that its services – including the format of its bills – in the competitive marketplace in which its CLEC segments operate – satisfy our customers. And, where customers are not satisfied, they have choices to select alternative providers. Because of this existence of choice the intervention of regulation should only be imposed where a clear and convincing need exists and where competitive forces are proven to be ineffective.

In general, Sprint objects to the application of the rule amendments because, without justification or any cost/benefit analysis, they impose unnecessary and harmful costs upon the competitive telecommunications marketplace. This constitutes a barrier to competitive entrants and increases prices to end user customers. CLEC operations are highly competitive and depend on the exercise of competitive choice by the customer for building their respective customer bases. Sprint is unaware of any compelling need for the application of billing or service rules to competitive telecommunication companies which must win every customer in the marketplace.