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VIA HAND DELIVERY

ORIGINAL

December 1, 2000

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

RECEIVED: FPSC
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RECORDS AND
REPORTING

Re: Docket No. 000075-TP Direct Testimony of Michael R. Hunsucker

Dear Ms. Bayó:

Enclosed for filing is the original and fifteen (15) copies of the Direct Testimony of Michael R. Hunsucker.

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.

Sincerely,

Susan S. Masterton

Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

MICHAEL R. HUNSUCKER

Q. Please state your name and business address.

A. My name is Michael R. Hunsucker. I am Director-Regulatory Policy, for Sprint Corporation. My business address is 6360 Sprint Parkway, Overland Park, Kansas 66251.

Q. Please describe your educational background and work experience.

A. I received a Bachelor of Arts degree in Economics and Business Administration from King College in 1979.

I began my career with Sprint in 1979 as a Staff Forecaster for Sprint/United Telephone - Southeast Group in Bristol, Tennessee, and was responsible for the preparation and analysis of access line and minute of use forecasts. While at Southeast Group, I held

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1 various positions through 1985 primarily responsible
2 for the preparation and analysis of financial
3 operations budgets, capital budgets and Part 69 cost
4 allocation studies. In 1985, I assumed the position
5 of Manager - Cost Allocation Procedures for Sprint
6 United Management Company and was responsible for the
7 preparation and analysis of Part 69 allocations
8 including systems support to the 17 states in which
9 Sprint/United operated. In 1987, I transferred back
10 to Sprint/United Telephone - Southeast Group and
11 assumed the position of Separations Supervisor with
12 responsibilities to direct all activities associated
13 with the jurisdictional allocations of costs as
14 prescribed by the FCC under Parts 36 and 69. In 1988
15 and 1991, respectively, I assumed the positions of
16 Manager - Access and Toll Services and General Manager
17 - Access Services and Jurisdictional Costs responsible
18 for directing all regulatory activities associated
19 with interstate and intrastate access and toll
20 services and the development of Part 36/69 cost
21 studies including the provision of expert testimony as
22 required.

23

1 In my current position as Director - Regulatory Policy
2 for Sprint/United Management Company, I am responsible
3 for developing state and federal regulatory policy and
4 legislative policy for Sprint's Local
5 Telecommunications Division. Additionally, I am
6 responsible for the coordination of regulatory/
7 legislative policies with other Sprint business units.

8

9 Q. Have you previously testified before state Public
10 Service Commissions?

11

12 A. Yes. I have previously testified before state
13 regulatory commissions in South Carolina, Florida,
14 Illinois, Pennsylvania, Nebraska and North Carolina.

15

16 Q. What is the purpose of your testimony?

17

18 A. The purpose of my testimony is to address, on behalf
19 of Sprint, Issues 1-9 of the List of Issues.

20

21

22 Issue 1: (a) Does the Commission have the jurisdiction to
23 adopt an inter-carrier compensation mechanism for
24 delivery of ISP-bound traffic?

1 (b) If so, does the Commission have the
2 jurisdiction to adopt such an inter-carrier
3 compensation mechanism through a generic proceeding?
4

5 Q. To what extent does the FPSC have jurisdiction to
6 determine inter-carrier compensation for traffic to
7 Internet Service Providers?
8

9 A. The FPSC's authority to determine inter-carrier
10 compensation for ISP traffic was addressed in the
11 FCC's Declaratory Ruling in CC Docket No. 96-98,
12 adopted February 25, 1999. In that ruling, although
13 the FCC concluded that Internet traffic was
14 "...jurisdictionally mixed and appears to be largely
15 interstate" (para. 1), it also conceded that "The
16 Commission has no rule governing inter-carrier
17 compensation for ISP-bound traffic". (para. 9)
18 Pending the outcome of its rulemaking proceeding to
19 establish federal rules for inter-carrier compensation
20 for ISP-bound traffic, the FCC explicitly permitted
21 state commissions to determine the appropriate
22 compensation for this traffic, holding that:
23 "A state commission's decision to impose reciprocal
24 compensation obligations in an arbitration proceeding-
25 -or a subsequent state commission decision that those

1 obligations encompass ISP-bound traffic--does not
2 conflict with any Commission rule regarding ISP-bound
3 traffic. By the same token, in the absence of
4 governing federal law, state commissions also are free
5 not to require the payment of reciprocal compensation
6 for this traffic and to adopt another compensation
7 mechanism." (para. 26)

8

9 Q. Can, and should, the FPSC adopt such an inter-carrier
10 compensation mechanism through a generic proceeding?

11

12 A. Yes. Although individual LECs are free to negotiate
13 whatever inter-carrier compensation arrangements are
14 appropriate for their particular circumstances, it
15 would clearly be more efficient and in the interests
16 of all LECs (both ILECs and ALECs alike) to resolve
17 this issue through a generic proceeding to determine
18 the appropriate inter-carrier compensation for ISP-
19 bound traffic.

20

21

22 Issue 2: Is delivery of ISP-bound traffic subject to
23 compensation under Section 251 of the
24 Telecommunications Act of 1996?

25

1 Q. Is delivery of ISP-bound traffic subject to
2 compensation under Section 251 of the
3 Telecommunications Act of 1996?
4

5 A. While the FCC has yet to make a final determination
6 regarding the appropriate compensation arrangement or
7 methodology that carriers should employ to compensate
8 each other for completing dial-up Internet calls, the
9 FCC has clearly stated that reciprocal compensation is
10 an acceptable option for the interim period. The FCC
11 declared that state commissions may order reciprocal
12 compensation be paid for terminating ISP-bound
13 traffic. In its February 25th Declaratory Ruling, the
14 FCC stated:

15 In the absence of a federal rule, state
16 commissions that have had to fulfill their
17 statutory obligation under section 252 to resolve
18 interconnection disputes between incumbent LECs
19 and CLECs have had no choice but to establish an
20 inter-carrier compensation mechanism and to
21 decide whether and under what circumstances to
22 require the payment of reciprocal compensation.
23 Although reciprocal compensation is mandated
24 under section 251(b)(5) only for the transport
25 and termination of local traffic [See 47 C.F.R.
26 51.701(a); *Local Competition Order*, 11 FCC Rcd at
27 16013], neither the statute nor our rules
28 prohibit a state commission from concluding in an
29 arbitration that reciprocal compensation is
30 appropriate in certain instances not addressed by
31 section 251(b)(5), so long as there is no
32 conflict with governing federal law. [As noted,
33 section 251(b)(5) of the Act and our rules

1 promulgated pursuant to that provision concern
2 inter-carrier compensation for interconnected
3 local telecommunications traffic. We conclude in
4 this Declaratory Ruling, however, that ISP-bound
5 traffic is non-local interstate traffic. Thus,
6 the reciprocal compensation requirements of
7 section 251(b)(5) of the Act and Section 51,
8 Subpart H (Reciprocal Compensation for Transport
9 and Termination of Local Telecommunications
10 Traffic) of the Commission's rules do not govern
11 inter-carrier compensation for this traffic. As
12 discussed, *supra*, in the absence a federal rule,
13 state commissions have the authority under
14 section 252 of the Act to determine inter-carrier
15 compensation for ISP-bound traffic.] A state
16 commission's decision to impose reciprocal
17 compensation obligations in an arbitration
18 proceeding -- or a subsequent state commission
19 decision that those obligations encompass ISP-
20 bound traffic -- does not conflict with any
21 Commission rule regarding ISP-bound traffic." [As
22 noted, in other contexts the FCC has directed the
23 states to treat such traffic as local. See *ESP*
24 *Exemption Order*, 3 FCC Rcd 2631, 2635 n.8, 2637
25 n.53.] (Declaratory Ruling at ¶26)

26

27

28 Issue 3: What actions should the commission take, if any,
29 with respect to establishing an appropriate
30 compensation mechanism for ISP-bound traffic in light
31 of current decisions and activities of the courts and
32 the FCC?

33

34 Q. What actions does Sprint recommend this commission
35 take with respect to establishing an appropriate
36 compensation mechanism for ISP-bound traffic?

1

2 A. The absence of a federal rule specifying the treatment
3 of ISP-bound traffic for purposes of reciprocal
4 compensation has created significant financial and
5 marketplace uncertainty for all LECs. As previously
6 discussed, the Commission does have the authority,
7 albeit on an interim basis, to resolve this issue.
8 Sprint urges the Commission to do so through a generic
9 determination for the industry as a whole.

10

11 **Issue 4: What policy considerations should guide the**
12 **Commission's decision in this docket? (Including, for**
13 **example, how the compensation mechanism will affect**
14 **ALECs' competitive entry decisions; cost recovery**
15 **issues and implications, economically efficient cost**
16 **recovery solutions in the short term and in the long**
17 **term.).**

18

19 **Q. What policy issues does Sprint recommend that the**
20 **Commission consider in this docket?**

21

22 A. Sprint urges the Commission to treat ISP-bound calls
23 as though they were local calls for purposes of inter-
24 carrier compensation arrangements. Thus, whatever

1 compensation arrangements apply to purely local calls
2 would apply to these calls as well. ISP-bound traffic
3 is functionally the same as other local voice traffic
4 and it is administratively cumbersome and/or expensive
5 to distinguish between the two types of traffic.
6 Longer holding times, for example, are characteristic
7 of other users in addition to ISP.

8
9 In addition, interconnecting LECs must necessarily
10 negotiate or arbitrate the reciprocal compensation
11 rates for jurisdictionally local traffic, and treating
12 ISP-bound traffic as local would avoid imposing
13 separate or additional regulatory hurdles on CLECs
14 that might make entry more difficult, expensive and
15 time-consuming. Furthermore, ISP-bound traffic, which
16 tends to be one-way, considered together with other
17 local traffic, may avoid the incentives for one party
18 or the other to seek compensation rates that are
19 unduly high or unduly low, depending on which carrier
20 tends to have the largest base of ISP customers.
21 Instead, by combining this traffic with other traffic
22 streams, carriers are likely to adopt more reasonable
23 negotiating positions. Thus, Sprint believes that
24 efficient entry and rational pricing schemes are most

1 likely to be encouraged if ISP-bound traffic is
2 treated for purposes of inter-carrier compensation the
3 same way it is treated for all other regulatory
4 purposes-i.e., as if it were purely local traffic.

5

6 **Q. Have any other state commissions ruled in favor of**
7 **treating ISP-bound calls as local for purposes of**
8 **reciprocal compensation?**

9

10 A. Yes. Following the FCC's February 1999 ruling,
11 numerous states have ruled that ISP traffic is local,
12 subject to reciprocal compensation. A few of the
13 states are Pennsylvania, North Carolina and Nevada,
14 just to name a few.

15

16

17 **Issue 5: Is the commission required to set a cost-based**
18 **mechanism for delivery of ISP-bound traffic?**

19

20 **Q. Does Sprint believe that a cost-based mechanism is**
21 **required for delivery of ISP-bound traffic?**

22

23 A. Under Section 251 and 252 of the Act, ILECs are
24 required to file cost-based rates for all traffic,

1 including ISP-bound traffic. Since rates already
2 exist, Sprint believes that using these rates for ISP,
3 as well as local traffic is the best policy to follow
4 in order to send economically efficient pricing
5 signals to the marketplace, although the local
6 switching rates do need to be structured into a two
7 part rate structure that recognizes the two distinctly
8 different cost components - call set-up and call
9 usage.

10

11

12 **Issue 6: What factors should the commission consider in**
13 **setting the compensation mechanism for delivery of**
14 **ISP-bound traffic?**

15

16 **Q. Please describe the general approach Sprint recommends**
17 **for compensation.**

18

19 **A.** Sprint believes that a reciprocal compensation rate
20 should ideally reflect the overall costs and mix of
21 traffic. Specifically, Internet calls have much longer
22 "holding times" than the average voice call. It is
23 essential that this critical difference be recognized in

1 the development of reciprocal compensation rates for
2 Internet traffic.

3

4 **Q. Please describe the switching cost components that**
5 **need to be considered in order to develop accurate**
6 **reciprocal compensation rates for ISP traffic.**

7

8 A. The cost of switching a telephone call consists of two
9 distinct cost components. One is incurred on a per
10 message basis, the other on a per minute basis. The
11 per message cost, also known as call set-up cost,
12 consists primarily of the amount of time the switch's
13 central processor requires to set-up the call. (There
14 are also some SS7 network costs associated with the
15 set-up of the trunk required for the call). These
16 costs are incurred for each call, and do not vary by
17 the length of the call.

18

19 Investment associated with the Minute of Use (MOU), or
20 call duration cost component, consists primarily of
21 the line and trunk investment portions of the switch.
22 These costs vary directly between calls based on
23 varying minutes of use. For example, the minute of
24 use cost component for a 10-minute call will be double

1 the minute of use cost for a 5-minute call.
2 Conversely, the per message cost component would be
3 the same for both the 10 minute call and for the five
4 minute call (everything else assumed constant).

5

6 **Q. Do the traditional ILEC local switching rate**
7 **structures reflect the differences in "holding**
8 **times"?**

9

10 A. No. Typically, ILECs do not charge for each switching
11 component separately; rather, a single per minute of
12 use billing rate is used by blending the per message
13 and usage sensitive costs into the per minute charge
14 using an assumed average call duration or "hold time."
15 This means that the per message cost will be spread
16 over an assumed average call duration characteristic
17 without distinction to the type of calls being made or
18 their duration. Under this scheme, calls with longer
19 call holding times than the average will result in
20 over-recovery of costs, since the per message cost
21 recovery is built based on an "average call" duration.
22 For calls with shorter holding times than the average,
23 the opposite will be true.

24

1 **Q. What is Sprint's recommended reciprocal compensation**
2 **rate structure?**

3
4 The basic tenet of Sprint's proposal is that as call
5 holding times increase, the per message (call-setup)
6 portion of the end office switching charge should be
7 spread across more minutes, thus reducing the overall
8 per MOU rate. (Overall per MOU rate is defined as the
9 per message cost component of a call spread over the
10 duration of the call, plus the per MOU unit cost
11 component of the call. Formula: Per message
12 Cost/Minute duration of call + Per MOU cost component
13 = Overall Per MOU compensation rate). The basic
14 switching components used for voice and Internet-bound
15 traffic are the same. There is nothing unique about
16 Internet calls that causes the per message and per MOU
17 unit cost components to change. Only the call
18 duration changes. The correct solution is to
19 bifurcate the switching charge into a call setup
20 charge and a call duration charge. Thus, regardless
21 of the length of the call or type of call, the charges
22 match the underlying costs and ensure that the costs
23 are recovered appropriately.

24

1 Q. Can local switching costs be readily separated into
2 two elements?

3

4 A. Yes. The Telecordia SCIS switching cost model widely
5 employed by the industry has a standard output for
6 central processor call set-up costs. Signaling costs
7 are not recovered, in the reciprocal compensation
8 context, by any other charge. Thus, switching costs
9 can be reliably separated into call setup and per MOU
10 amounts.

11

12 Q. Please provide an example of the application of the
13 bifurcated rate structure.

14

15 A. Let's assume that the average holding time for ILEC
16 terminated traffic is 5 minutes while the average
17 holding time for ISP traffic is 30 minutes. Further,
18 let's assume that the call setup cost is \$.012 per
19 call and the switching cost is \$.002 per minute of use
20 (MOU). When the ILEC develops a blended switching
21 rate, the rate would be based on call setup of \$.012
22 plus 5 MOU at \$.002 for a combined cost of \$.022 for
23 the five minute call or \$.0044 for each MOU. The
24 resulting rate of \$.0044 is billed on all ILEC

1 terminated calls and the CLEC has the right to use
2 this rate for billing the ILEC for ISP terminated
3 calls. Assuming a holding time of 30 minutes for ISP
4 traffic, the CLEC would charge the ILEC 30 MOU times
5 \$.0044 or \$.132 for the 10 minute call. Under a
6 bifurcated rate structure, the CLEC would charge the
7 ILEC for 1 call setup at \$.012 plus 30 MOU at \$.002
8 for a combined charge of \$.072. This results in a
9 change of \$.06 (\$.132-\$.072) or 45%. The practical
10 reality of a change to a bifurcated rate structure is
11 that CLECs should not be compensated for more than one
12 call setup per message (for any type of local dialed
13 call) as they only incur this cost one time per call.

14

15

16 **Q. Is it Sprint's recommendation that the bifurcated rate**
17 **structure apply to all traffic subject to reciprocal**
18 **compensation?**

19

20 **A.** Yes. The bifurcated rate structure more closely
21 aligns compensation with the way costs are incurred
22 and applying it to all local dialed traffic avoids
23 discrimination. It also has the advantage of

1 eliminating the need to attempt to separately identify
2 ISP traffic.

3

4 **Q. Have any other state Commissions adopted the**
5 **bifurcated rate structure?**

6

7 A. Yes. This bifurcated rate structure for local
8 switching has been adopted by the Texas PUC
9 [*Proceeding to Examine Reciprocal Compensation*
10 *Pursuant to Section 252 of the Federal Communications*
11 *Act of 1996, Docket No. 21982, Arbitration Award, July*
12 *13, 2000, at 49A.*], as well as the Wisconsin
13 Commission.

14

15

16 **Issue 7: Should inter-carrier compensation for delivery of**
17 **ISP-bound traffic be limited to carrier and ISP**
18 **arrangements involving circuit-switched technologies?**

19

20 **Q. Should inter-carrier compensation for delivery of ISP-**
21 **bound traffic be limited to carrier and ISP**
22 **arrangements involving circuit-switched technologies?**

23

1 A. To limit inter-carrier compensation for ISP-bound
2 traffic to only circuit-switched traffic is both
3 unwarranted and provides uneconomic incentives for
4 LECs not to implement more advanced, and more
5 efficient, technologies. For example, Sprint's ION
6 (Integrated On-demand Network) utilizes packet-
7 switching technology. Excluding Sprint from the
8 reciprocal compensation arrangements applicable to
9 those LECs utilizing circuit-switched technology would
10 impose on Sprint the additional delay, costs, and
11 burden of separately arbitrating the issue of the
12 level of inter-carrier compensation. In effect, it
13 would penalize Sprint for being innovative and
14 aggressive in adopting a more forward-looking and more
15 efficient technology.

16

17

18 Issue 8: How can ISP-bound traffic be separated from non-
19 ISP bound traffic for purposes of addressing any
20 reciprocal compensation payments?

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22

23 Q. Should a separate class of service be created for
24 dial-up Internet traffic?

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A. At this time, there is no need to create a separate class of service for dial-up Internet traffic for several reasons. First, it appears that all carriers do not have the technology sufficient to separate out dial-up Internet traffic from other types of local traffic and it is extremely administratively burdensome to do so. Second, there are other types of traffic, besides Internet traffic, that tend to generate a disproportionately larger amount of terminating traffic than originating. It is far from clear that Internet traffic should be singled out as some type of arbitrage culprit without looking at all types of traffic and traffic flows.

Q. Can Internet traffic presently be distinguished from other categories of telephone calls?

A. No, not very easily. At present, the main method an interconnected carrier has for determining ISP-bound traffic is terminating to a CLEC is to compare originating and terminating traffic flows between itself and the CLEC. If the ILEC is terminating

1 significantly more traffic to the CLEC than the CLEC
2 terminates to the ILEC, then the ILEC typically makes
3 the assumption that the traffic being terminated to
4 the CLEC is ISP-bound traffic. Another method for
5 differentiating the traffic is to identify all ISP
6 local numbers. In some instances, ILECs have measured
7 the traffic terminating to an ISP by asking the CLEC
8 to identify ISP-related NXXs. However, such a method
9 is administratively burdensome and largely unworkable.
10 Billing records must be updated daily, if not hourly,
11 to ensure accurate tracking of ISP minutes.
12 Furthermore, there are CPNI restrictions that could
13 preclude the CLEC from providing customer sensitive
14 information of the ISP's network usage to the ILEC.
15 Additionally, if an ILEC knows that a CLEC serves only
16 ISP traffic, the ILEC could identify the trunk groups
17 serving that CLEC and measure the traffic flowing over
18 those trunk groups. However, it should be emphasized
19 that the ILEC does not know with any degree of
20 certainty whether the type of traffic it is
21 terminating to the CLEC is ISP-bound. Rather, it must
22 merely assume that the traffic is ISP-bound based on
23 holding times.

24

1

2

Issue 9: Should the Commission establish compensation

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mechanisms for delivery of ISP-bound traffic to be used

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in the absence of the parties reaching an agreement for

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negotiating a compensation mechanism? If so, what should

6

the mechanism be?

7

8

Addressed in Issue 4 above.

9

10

11

Q. Does that conclude your testimony?

12

13

A. Yes.

CERTIFICATE OF SERVICE
DOCKET NO. 000075-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 1st day of December, 2000 to the following:

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