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May 31, 2001

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

Re: Docket No. 000075-TP (Phase II) Sprint -Florida Incorporated,
Notice of Service of Responses to Staff's First Set of Interrogatories
and First Request for Production of Documents

Dear Ms. Bayó:

Enclosed for filing is the original and five (5) copies of Sprint-Florida Incorporated, Notice of Service of Responses to Staff's First Set of Interrogatories and First Request for Production of Documents.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

Susan S. Masterton

Enclosures

DOCUMENT NUMBER-DATE

06867 MAY 31 2001

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate)
Methods to Compensate Carriers for)
Exchange of Traffic Subject to Section)
251 of the Telecommunications Act)
of 1996. _____)

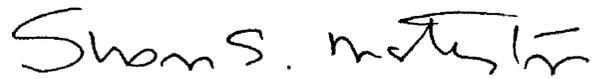
Docket No. 000075-TP
(Phase II)

Filed: May 31, 2001

NOTICE OF SERVICE SPRINT-FLORIDA, INCORPORATED'S
RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

NOTICE IS HEREBY GIVEN that a true and correct copy of Sprint-Florida, Incorporated's Responses to Staff's First Set of Interrogatories and First Request for Production of Documents, which were legally propounded by the Staff of the Florida Public Service Commission on May 11, 2001, was sent via hand delivery on May 31, 2001, to Felicia Banks, Staff Counsel for the Florida Public Service Commission at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

Respectfully Submitted,



Susan S. Masterton
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Post Office Box 2214
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850/599-1560

CERTIFICATE OF SERVICE
DOCKET NO. 000075-TP (Phase II)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 31th day of May, 2001 to the following:

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c/o Nancy H. Sims
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Cox Communications
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BroadBand Office
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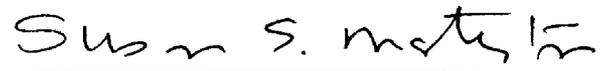
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Susan S. Masterton

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 1

REQUEST: In the recent FCC Order No. 01-131, the FCC established certain interim measures for compensating ISP-bound traffic, as well as revisions removing the word "local" from certain rules.

- a) Does FCC Order No. 01-131 impact any issues being addressed in this docket?
- b) If the answer to (a) is affirmative, which issues are impacted and how?

RESPONSE:

- a) While the FCC Order was aimed at compensation for ISP-bound traffic (which was addressed in an earlier phase of this docket), the FCC's interim compensation does have an impact on issues in this docket. The FCC allowed for an opt-in decision on behalf of the ILECs to the rates for ISP compensation. In order for an ILEC to pay the interim rate, the ILEC must also accept compensation for all 251(b) traffic (including CMRS) at the same rate. This would create a compensation structure without regards to the type of functionality being performed (i.e. local switching, tandem switching, etc.) and renders moot any discussion of "similar functionality" or "comparable geographic area" if the ILEC adopts the interim FCC plan.
- b) Sprint believes that the removal of the word "local" from certain FCC rules was intended only to clarify the FCC classification of ISP-bound traffic (i.e. information access) within the context of the rules. It was, in no way, intended to change the compensation on "local" traffic.

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 2

REQUEST: Please refer to page 7, line 20 of witness Hunsucker's direct testimony, filed March 12, 2001.

- a) Give examples of "equivalent facilities" as referenced in your discussion of tandem switching.
- b) Does Sprint utilize any such equivalent facility in its network?
- c) If the answer to (b) is affirmative, please identify this equivalent facility and describe how it is utilized.

RESPONSE:

- a) Sprint is not aware of CLEC network architectures other than its own and currently Sprint does not employ any facility capable of trunk to trunk switching. However, as Sprint's CLEC network continues to grow, Sprint may in fact deploy such functionality in its network in the future.
- b) See (a).
- c) N/A

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 3

REQUEST: Please refer to page 9, lines 15-22 of witness Hunsucker's direct testimony, filed March 12, 2001.

- a) When you state that a switch should be "capable of trunk to trunk connectivity," do you mean to say that the switch can merely be capable of this function, or should it be actually performing trunk to trunk connectivity to be considered performing similar functions to a tandem switch?
- b) Are there any other functions besides trunk to trunk connectivity that would qualify a switch as performing similar functions to tandem switch?

RESPONSE:

- a) The switch should actually be performing the similar function, i.e. trunk to trunk switching on a particular call. ALECs should not have an arbitrage incentive to purchase trunk to trunk functionality from their vendor just to receive higher compensation.
- b) Aggregation of traffic would also qualify a switch as performing similar functions to a tandem switch.

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 4

REQUEST: Please refer to page 10, lines 3-22 of witness Hunsucker's direct testimony, filed March 12, 2001.

- a) If the FPSC was to establish a test or "benchmark" for determining whether an ALEC switch serves a comparable geographic area, what should that test be?
- b) What information should an ALEC be required to provide in order to prove that its switch serves a comparable geographic area to that served by an ILEC tandem?

RESPONSE:

- a) The ALEC should self-certify their intent to hold themselves out-to-serve the particular geographic area. Resale should not be allowed as a means of meeting the test as the ALEC is not deploying retail end user services using the particular switch(es) in question.
- b) ALECs should be required to provide a self-certification letter to the Florida Commission certifying that its switch serves a comparable geographic area to that served by an ILEC tandem.

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 5

REQUEST: Please refer to page 15, lines 2-11 of witness Hunsucker's direct testimony, filed March 12, 2001.

- a) Does Sprint believe that intercarrier compensation for a particular call should be determined by the physical location of the originating and terminating end users or by the NXXs assigned to those end users?
- b) If the answer to (a) is physical location, how should long distance traffic be identified and separated from local traffic to end users assigned numbers out of the same NXX?
- c) If the answer to (a) is by NXX, should reciprocal compensation be paid for traffic to end users utilizing an NXX that is local to the calling party but terminating in (1) a different LATA or (2) a different state.

RESPONSE:

- a) Compensation should be based on the physical location of the originating and terminating end users of the ILEC and ALEC. In the past, the main driver behind this issue was the establishment of virtual rate centers for ISP-bound traffic. Given the FCC's order on the classification of ISP-bound traffic, Sprint believes that the potential difference between the two options is minimal. However, Sprint has no empirical evidence to support this conclusion.
- b) Sprint would encourage the Commission to establish an industry task force to determine the feasibility and appropriate methodology for identifying and separating this traffic. This is the only way to gather empirical evidence on the cost/benefit of the two proposed options.
- c) N/A

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 6

REQUEST: Please refer to page 18, lines 9-13 of witness Hunsucker's direct testimony, filed March 12, 2001.

- a) Please explain why a voice call delivered via IP through packet switches should not be considered IP Telephony.
- b) What is the difference between the IP Telephony and the scenario described in lines 9-11 of your testimony?

RESPONSE:

- a) Because IP Telephony includes both information access and telecommunications services, Sprint does not contend that a voice call delivered via IP through packet switches should not be considered IP Telephony. However, a voice call delivered via IP through packet switches is a telecommunications service and should be subject to reciprocal compensation (or access). In other words, it should be compensated no differently than a circuit switched voice call.
- b) See (a).

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 7

REQUEST: If the FPSC were to determine that reciprocal compensation should be paid for local voice traffic delivered via IP telephony, how could this traffic be tracked in order to apply minute of use rates?

RESPONSE:

Sprint's ION product is currently provided via packet switching using IP protocol. Sprint currently employs a device known as a service manager in the Sprint network that performs minute of use measurements on any and all packet switched calls. This allows Sprint to accurately measure minutes of use for reciprocal compensation purposes. Sprint has no knowledge of other CLEC networks and thus cannot comment on the ability of others to measure minutes of use.

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Set of Interrogatories
May 11, 2001
Item No. 8

REQUEST: Please refer to page 3, lines 21-25 of witness Hunsucker's rebuttal testimony, filed April 19, 2001.

- a) Is it your understanding that Rule 51.701(c) was established as a result of the FCC's discussion in Paragraph 1090 of the First Report and Order?
- b) If the answer to (a) is negative, please identify which FCC discussion in the First Report and Order correlates to the establishment of Rule 51.701(c).

RESPONSE:

- a) Sprint believes that the FCC Rules in Subpart H – Reciprocal Compensation for Transport and Termination of Local Telecommunications Traffic resulted from paragraphs 1027 – 1118. Paragraph 1090 allows state commissions to set rates based on whether the traffic is routed through a tandem switch and provides the appropriate language on “comparable geographic area”.
- b) N/A

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy

Sprint – Florida, Incorporated
Docket No. 000075-TP
Staff's First Request for Production of
Documents
May 11, 2001
Item No. 1

REQUEST: Please provide a copy of the April 1998 USF Order referenced on page 15, line 24 of Hunsucker's direct testimony, filed March 12, 2001.

RESPONSE: Please see attached file "CC Docket 96-45.txt" that is referenced in Michael Hunsucker's direct testimony, filed March 12, 2001.

INFORMATION PROVIDED BY: Michael Hunsucker
Director – Regulatory Policy