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June 12, 2001

**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

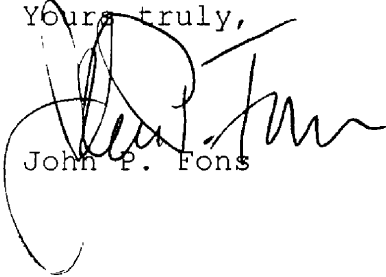
Dear Ms. Bayo:

Enclosed for filing in the above docket is the original and fifteen (15) copies of Sprint's Response to Motion for Continuance.

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

Enclosures

cc: All parties of record

DOCUMENT NUMBER-DATE  
07257 JUN 12 2001  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into  
Pricing of Unbundled Network  
Elements  
(Phase III - Verizon/Sprint)

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DOCKET NO. 990649-TP  
FILED: June 12, 2001

**RESPONSE TO MOTION FOR CONTINUANCE**

COMES NOW, Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership ("Sprint") and files this Response to the Motion of WorldCom, AT&T and Covad ("Joint Movants") for a Continuance<sup>1</sup> of the final hearings in this docket. In support, Sprint states as follows:

1. Sprint categorically and emphatically objects to any further delay in the proceeding as it relates to Sprint's cost studies and supporting testimony. To date, Sprint has filed its cost studies and testimony twice in this docket. This effort has been costly and time-consuming. Delaying the hearing by another 8-10 months would require that the studies be re-filed with current information and increase the risk that subsequent Federal and/or judicial intervention could change the rules yet again. Sprint seeks finality of this issue so that it can move beyond this docket. Sprint believes that any further delay is

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<sup>1</sup> In the same pleading, the Joint Movants filed a Notice of withdrawal Motion Regarding BSTLM. Sprint takes no position on this aspect of pleading.

unwarranted and therefore objects to prolonging the resolution of this case as it relates to Sprint's cost studies.

2. It is ironic that when Sprint earlier requested a delay in filing its testimony and cost studies in the instant phase of this docket, until such time as there would be some finality to the BellSouth phase of this docket, that request was opposed by some of the very same parties who now seek a delay for their own convenience. Nevermind that Sprint was significantly inconvenienced by the denial of its request for continuance and the resulting rush to meet the filing date that was shorter than Sprint had requested. Had Sprint's request to file its testimony and cost study on July 2, 2001, not been opposed, there is substantial likelihood that Sprint's extraordinary efforts would not now be running the risk of having been undertaken in vain.

3. With respect to Verizon, Sprint is likewise interested in seeing that case proceed as scheduled. Sprint is currently in the process of developing an interconnection agreement with Verizon in Florida. On June 1, 2001 Sprint filed a petition for arbitration of certain issues between Sprint and Verizon. Integral to the completion of an interconnection arrangement are reasonable, lawful, cost-based, deaveraged prices for local interconnection. Any further delay in the hearing will delay the day that such prices will be achieved. True-up mechanisms

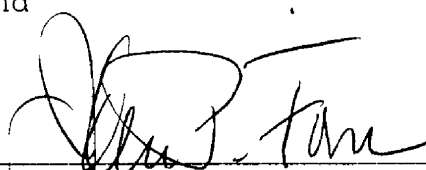
are reasonable in some circumstances, but ultimately introduce uncertainty and confusion in pricing services to end-users and developing business plans. For these reasons, Sprint does not favor delaying the Verizon hearings as proposed by the Joint Movants.

WHEREFORE, for the above reasons, Sprint request that the Commission Deny Joint Movants' Motion for Continuance. Should the Commission be inclined to grant the Motion with respect to Verizon, Sprint urges in the strongest possible terms that the Commission deny the Motion with respect to Sprint.

RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of June, 2001.

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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 12th day of June, 2001, to the following:

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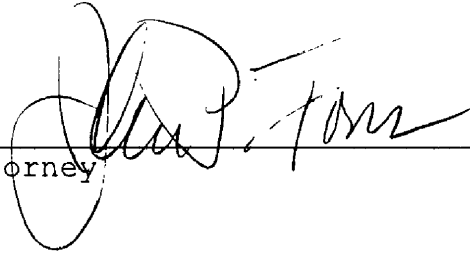
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