

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Sprint
Communications Company Limited
Partnership for arbitration with
Verizon Florida Inc. pursuant to
Section 251/252 of the Telecom-
munications Act of 1996.

DOCKET NO. 010795-TP

FILED: November 13, 2001

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-01-1753-PCO-TP, issued August 28, 2001, the Staff of the Florida Public Service Commission files its Prehearing Statement.

A. All Known Witnesses

None.

B. All Known Exhibits

None.

C. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

D. Staff's Position on the Issues

ISSUE 1: In the new Sprint/Verizon interconnection agreement:

(A) For the purposes of reciprocal compensation, how should local traffic be defined?

(B) What language should be included to properly reflect the FCC's recent ISP Remand Order?

DOCUMENT NUMBER-DATE

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POSITION: No position at this time.

ISSUE 2: For the purposes of the new Sprint/Verizon interconnection agreement:

- (A) Should Sprint be permitted to utilize multi-jurisdictional interconnection trunks?
- (B) Should reciprocal compensation apply to all calls from one Verizon customer to another Verizon customer, that originate and terminate on Verizon's network within the same local calling area, utilizing Sprint's "00-" dial around feature?

POSITION: No position at this time.

ISSUE 3: For the purposes of the new Sprint/Verizon interconnection agreement, should Verizon be required to provide custom calling/vertical features, on a stand alone basis, to Sprint at wholesale discount rates?

POSITION: No position at this time.

ISSUE 4: This issue has been settled by the parties.

ISSUE 5: This issue has been withdrawn.

ISSUE 6: For the purposes of the new Sprint/Verizon interconnection agreement, should Sprint be permitted to:

- (A) Require Verizon to provide UNE Multiplexing?
- (B) Route access traffic over UNEs leased from Verizon at cost-based rates?

POSITION: No position at this time.

ISSUE 7: This issue has been withdrawn.

ISSUE 8: This issue has been settled by the parties.

ISSUE 9: This issue has been withdrawn.

ISSUE 10: This issue has been withdrawn.

ISSUE 11: This issue has been settled by the parties.

ISSUE 12: Should changes made to Verizon's Commission-approved collocation tariffs, made subsequent to the filing of the new Sprint/Verizon interconnection agreement, supercede the terms set forth at the filing of this agreement?

POSITION: No position at this time.

ISSUE 14: This issue has been withdrawn.

ISSUE 15: For the purposes of the new interconnection agreement, should Sprint be required to permit Verizon to collocate equipment in Sprint's central offices?

POSITION: No position at this time.

ISSUE 16: This issue has been settled by the parties.

E. Pending Motions

There are no pending motions in this case.

F. Pending Confidentiality Claims or Requests

There are no pending confidentiality claims or requests in this case.

G. Compliance with Order No. PSC-01-1753-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

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Respectfully submitted this 13 day of November, 2011.



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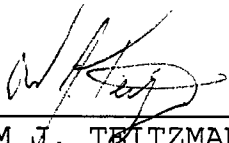
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's Prehearing Statement has been furnished to **Susan S. Masterton and Charles Rehwinkel**, Sprint, Sprint Communications Company Limited Partnership, 1313 Blair Stone Road, Tallahassee, Florida 32301; **Joseph P. Cowin**, Sprint Communications Company Limited Partnership(KS), 7301 College Boulevard, Overland Park, Kansas 66210; **Ms. Michelle A. Robinson**, Verizon Florida Inc., c/o **Mr. David Christian**, 106 East College Avenue, Suite 810, Tallahassee, Florida 32301-7704; and **Kimberly Caswell**, Verizon Florida Inc., P.O. Box 110, FLTC0007, Tampa, Florida 33601-0110, by U.S. Mail, on this 13 day of November, 2001.



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