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January 3, 2002

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. 990649A-TP


Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies Sprint's Prehearing Statement.

Also enclosed is a diskette containing the above Prehearing Statement originally typed in Microsoft Word 97 format, which has been saved in Rich Text format for use with Word Perfect.

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

00056 JAN-3 2002

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
Pricing of Unbundled Network
Elements

DOCKET NO. 990649A-TP
FILED: January 3, 2002

SPRINT'S PREHEARING STATEMENT

Sprint Communications Company Limited Partnership ("Sprint"), pursuant to Order No. PSC-01-2132-PCO-TP, issued October 29, 2001, submits the following Prehearing Statement.

A. **WITNESSES:** Sprint does not intend to present any prefiled testimony in this proceeding. However, Sprint reserves the right to present live witnesses at the hearings in response to actions of or testimony presented by BellSouth or other parties in this proceeding.

B. **EXHIBITS:** Sprint does not intend to present any prefiled exhibits in this proceeding. However, Sprint reserves the right to present exhibits at the hearings in response to the actions of or testimony or exhibits presented by BellSouth or other parties in this proceeding.

C. **BASIC POSITION:** BellSouth should be required to file monthly recurring and non-recurring rates for unbundled network elements which are "cost-based" as required by Section 252(d)(1)

of the 1996 Telecommunications Act and as defined and implemented by the FCC's Orders and Rules.

D-G. ISSUES AND POSITIONS:

Issue 1(a): Are the loop cost studies submitted in BellSouth's 120-day filing compliant with Order No. PSC-01-1181-FOF-TP?

Position: In compliance with the Commission's Order No. PSC-01-1181, FOF-TP, BellSouth was required to provide "bottoms-up," non-linear, Florida-specific input values for its cost study. Using these input values, BellSouth's revised cost study should have eliminated the distortion in the costs of wire centers in urban and rural areas. (See Order, page 294). Unlike its use of system-wide "in-plant" and "loading" factors, such study should comply with the requirements of Section 252(d)(1) of the 1996 Telecommunications Act. Despite BellSouth's desire to continue using "in-plant" and "loading" factors, the Commission should require BellSouth to use the "bottoms-up" approach.

Issue 1(b): Should BellSouth's loop rates or rate structure previously approved in Order No. PSC-01-1181-FOF-TP be modified? If so, to what extent, if any, should the rates or rate structure be modified?

Position: See Sprint's position on Issue 1(a).

Issue 2(a): Are the ADUF and ODUF cost studies submitted in BellSouth's 120-day filing compliance filing appropriate?

Position: No position at this time.

Issue 2(b): Should BellSouth's ADUF and ODUF rates or rate structure previously approved in Order No. PSC-01-1181-FOF-TP be modified? If so, to what extent, if any, should the rates or rate structure be modified?

Position: No position at this time.

Issue 3(a): Are the UCL-ND loop cost studies submitted in BellSouth's 120-day filing compliant with Order No. PSC-01-1181-FOF-TP?

Position: No position at this time.

Issue 3(b): What modifications, if any, are appropriate and what should the rates be?

Position: No position at this time.

Issue 4(a): What revisions, if any should be made to NIDs in both the BSTLM and the stand-alone NID cost study?

Position: No position.

Issue 4(b): To what extent, if any, should the rates or rate structure be modified?

Position: No position.

Issue 5(a): What is a "hybrid copper/fiber xDSL-capable loop" offering and is it technically feasible for BellSouth to provide it?

Position: No position at this time.

Issue 5(b): Is BellSouth's cost study contained in the 120-day compliance filing for the "hybrid copper/fiber xDSL-capable loop" offering appropriate?

Position: No position at this time.

Issue 5(c): What should the rate structure and rates be?

Position: No position at this time.

Issue 6: In BellSouth's 120-day filing, has BellSouth accounted for the impact of inflation consistent with Order No. PSC-01-2051-FOF-TP?

Position: No position at this time.

Issue 7: Apart from issues 1-6, is BellSouth's 120-day filing consistent with the orders in this docket?

Position: No position at this time.

H. **STIPULATIONS:** Sprint is not aware of any pending stipulations at this time.

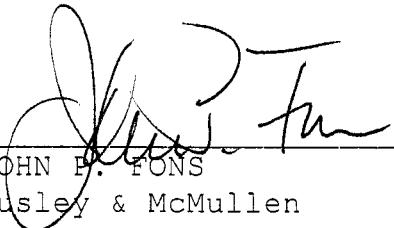
I. **PENDING MOTIONS:** Sprint is not aware of any pending motions at this time.

J. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** Sprint does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 3rd day of January 2002.

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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 3rd day of January 2002, to the following:

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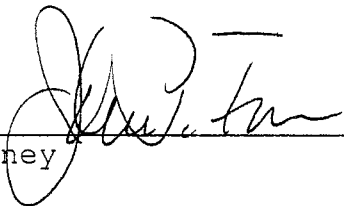
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