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April 11, 2002

Ms. Blanca Bayo', Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No. 990649B-TP

Dear Ms. Bayo':

Enclosed for filing on behalf of Sprint-Florida are the original and 15 copies of the following:

1. Sprint-Florida's Notice of Service of Responses to Staff's Fourth Request for Production of Documents (Nos. 33 and 36).
2. Sprint-Florida's Responses to Staff's Fourth Request for Production of Documents (Nos. 33 and 36).
3. Sprint-Florida's Request for Confidential Classification Pursuant to Section 364.183(1), Florida Statutes.

Copies are being served on the parties in this docket, pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosures

DOCUMENT NUMBER-DATE

04071 APR 11 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into )  
pricing of Unbundled network elements )  
\_\_\_\_\_ )

Docket No.: 990649B-TP

Filed: April 11, 2002

**SPRINT-FLORIDA, INCORPORATED'S NOTICE OF SERVICE**  
**OF RESPONSES TO STAFF'S FOURTH REQUEST FOR PRODUCTION OF**  
**DOCUMENTS (Nos. 33 AND 36)**

NOTICE IS HEREBY GIVEN that a true and correct copy of the responses of Sprint-Florida, Incorporated ("Sprint-Florida") to Staff's Fourth Request for Production of Documents (Nos. 33 and 36) which were legally propounded by staff on January 29, 2002, was submitted via hand delivery to Jason Fudge, Esq., 2540 Shumard Oak Blvd., Tallahassee, Florida 32399. The documents responsive to Requests No. 33 and 36 were submitted under seal to the Clerk of Commission, subject to a Request for Confidential Classification. Copies of this Notice have been served on the parties to this docket pursuant to the attached Certificate of Service.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of April 2002.



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Susan Masterton  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
850-599-1560 (phone)

AND

John P. Fons  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(850) 224-9115

ATTORNEYS FOR SPRINT-FLORIDA

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into  
Pricing of Unbundled Network  
Elements

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DOCKET NO. 990649B-TP  
DATED: April 11, 2002

**SPRINT-FLORIDA'S RESPONSES TO STAFF'S FOURTH REQUEST  
FOR PRODUCTION OF DOCUMENTS (NOS. 33 and 36)**

Pursuant to Rule 25-22.034, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, Sprint-Florida, Incorporated ("Sprint-Florida"), by and through undersigned counsel, hereby responds to the Staff's Fourth Request for Production of Documents (Nos. 33 and 36), dated January 29, 2002, as set forth below.

**DOCUMENTS REQUESTED**

33. a) **Please provide all work papers and supporting documents that yield the switching vendor discounts used in the switching cost study.**
- b) **To the extent not provided in response to a), please provide copies of pertinent vendor contracts or other documents that support the switch discounts.**

**RESPONSE:**

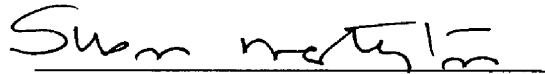
- a) Sprint-Florida's response to this request is contained in a CD ROM filed with the Division of Records and Reporting pursuant to a Request for Confidential Classification.
- b) Sprint-Florida's response to this request, consisting of two vendor contracts, has been filed with the Division of Records and Reporting pursuant to a Request for Confidential Classification.
36. a) **Referring to Volume III of III, Work Papers, II. Switching, please provide the SCIS input sheets for the following offices:**  
**(1) ALSPFLEXADSO**

- (2) TLHSFLXDDSO
- b) Please provide documentation (e.g., SCIS user manual) that explains and defines each of the inputs shown on the input sheets provided in response to (a).

RESPONSE:

- a) Sprint-Florida's response to this request is contained in a CD ROM filed with the Division of Records and Reporting pursuant to a Request for Confidential Classification.
- b) Sprint-Florida's response to this request is contained in a CD ROM filed with the Division of Records and Reporting pursuant to a Request for Confidential Classification.

DATED this 11<sup>th</sup> day of April, 2002.



SUSAN MASTERTON  
Sprint-Florida, Inc.  
P. O. Box 2214  
Tallahassee, Florida 32316  
(850) 599-1560

and

JOHN P. FONS  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(850) 224-9115

ATTORNEYS FOR SPRINT-FLORIDA

**CERTIFICATE OF SERVICE  
DOCKET NO. 990649B-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery\* or U.S. Mail this 11th day of April, 2002 to the following:

Karen Jusevitch, Esq.  
AT&T Communications of the Southern  
States, Inc.  
101 N. Monroe St., #700  
Tallahassee, FL 32301

Florida Competitive Carriers Assoc.  
c/o McWhirter Law Firm  
Joseph McGlothlin/Vicki Kaufman  
117 S. Gadsden St.  
Tallahassee, FL 32301

AT&T Communications of the Southern  
States, Inc. (GA)  
Virginia Tate  
1200 Peachtree St., Suite 8068  
Atlanta, GA 30309

Florida Digital Network, Inc.  
Mathew Feil  
390 North Orange Ave., Suite 2000  
Orlando, FL 32801

Ausley Law Firm  
Jeffrey Wahlen/John Fons  
P.O. Box 391  
Tallahassee, FL 32302

Hopping Law Firm  
Richard Melson/Gabriel E. Nieto  
P.O. Box 6526  
Tallahassee, FL 32314

BellSouth Telecommunications, Inc.  
Ms. Nancy B. White  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

ITC^DeltaCom  
Ms. Nanette Edwards  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Covad Communications Company  
Mr. William H. Weber  
1230 Peachtree Street, NE, 19th Floor  
Altanta, GA 30309-3574

Intermedia Communications, Inc.  
Ms. Donna C. McNulty  
The Atrium, Suite 105  
325 John Knox Road  
Tallahassee, FL 32303-4131

Development Specialists, Inc.  
Norton Cutler  
c/o Steve Victor  
70 West Madison Street, Suite 2300  
Chicago, IL 60602-4250

KMC Telecom Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043-8119

Florida Cable Telecommunications  
Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Katz, Kutter Law Firm  
Charles Pellegrini/Patrick Wiggins  
12th Floor  
106 East College Avenue  
Tallahassee, FL 32301

Kelley Law Firm  
Genevieve Morelli/Eric Jenkins  
1200 19th St. NW, Suite 500  
Washington, DC 20036

Kelley Law Firm  
Jonathan Canis/Michael Hazzard  
1200 19th St. NW, Fifth Floor  
Washington, DC 20036

MCI WorldCom  
Ms. Donna C. McNulty  
325 John Knox Road, Suite 105  
Tallahassee, FL 32303-4131

MCI WorldCom, Inc.  
Mr. Brian Sulmonetti  
Concourse Corporate Center Six  
Six Concourse Parkway, Suite 3200  
Atlanta, GA 30328

McWhirter Law Firm  
Vicki Kaufman/Joseph McGlothlin  
117 S. Gadsden St.  
Tallahassee, FL 32301

Messer Law Firm  
Norman Horton/Floyd Self/Tracy Hatch  
215 South Monroe Street, Suite 710  
Tallahassee, FL 32302

Network Access Solutions Corporation  
Mr. Don Sussman  
Three Dulles Tech Center  
13650 Dulles Technology Drive  
Herndon, VA 20171-4602

Pennington Law Firm  
Marc W. Dunbar  
P.O. Box 10095  
Tallahassee, FL 32302

Shook, Hardy & Bacon LLP  
Rodney L. Joyce  
600 14th Street, N.W., Suite 800  
Washington, DC 20005-2004

Supra Telecommunications and  
Information Systems, Inc.  
Mark E. Buechele  
Koger Center - Ellis Bldg.  
1311 Executive Center Dr., Suite 200  
Tallahassee, FL 32301-5027

Swidler & Berlin  
Michael Sloan/Harisha Bastiampillai  
3000 K St. NW, #300  
Washington, DC 20007-5116

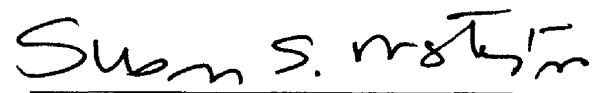
Time Warner Telecom of Florida, L.P.  
Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069

Verizon Florida, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

Z-Tel Communications, Inc.  
George S. Ford  
601 S. Harbour Island Blvd.  
Tampa, FL 33602-5706

Beth Keating\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Stephen C. Reilly  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, Florida 32399-1400

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Susan S. Masterton