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May 23, 2002

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

RE: Docket No. 011077

Dear Ms. Bayó:

Enclosed is an original and 15 copies of Sprint's comments which we ask you to file in the captioned matter. These comments were requested by Staff at the May 2, 2002 meeting/conference call to discuss PC freezes on Resale to UNE-P conversions.

A copy of the letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

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Susan S. Masterton

Enclosures

cc: All Parties of Record AUS CAF Fordham MP COM CTR ECR GCL MMS SEC OTH 5/29/02



DOCUMENT NUMBER-DATE

05530 MAY 23 8

FPSC-COMMISSION CLERK

Sprint Comments - Docket 011077-TP Comments on PC Freeze and Resale to UNE-P conversion as discussed at May 2, 2002 meeting

The issue of whether local carriers require an alternative local exchange carrier to unfreeze a local PC freeze prior to converting a line from resale to UNE-P was discussed at a meeting on May 2, 2002. Sprint indicated at that meeting that it has no requirement to unfreeze the local PC freeze prior to the conversion. Staff asked Sprint to provide more specifics on how the resale to UNE-P conversion process works at Sprint. The following is a description of how this process works at Sprint.

Migrating from Resale to UNE-P

When a customer chooses to migrate their existing Resale services to UNE-P, Sprint must do this migration without service interruption. The following describes the migration process at a high level with two scenarios. The volume of Resale to UNE-P migrations the customer is requesting determines which scenario of the process will be followed. Migrations involving 20 lines or more are handled as projects and should be coordinated with the customer, the Sprint Field Service Manager (FSM) and the Sprint Carrier Market Service Center

Scenario 1

This scenario applies when the customer requests that the majority of their existing Resale services be migrated to UNE-P. Since a large portion of the services on the account are being requested to migrate to UNE-P, the account will be converted rather than converting each individual line.

The first step is to remove all lines that are not being migrated to UNE-P from the account and place them on a new Resale Major Account that will be established for the customer. This requires two orders. The first order is a change order on the existing Major Account where all of the resale lines currently reside. This change order removes the lines that are not being migrated to UNE-P. A code indicating that no physical work is required must be added to the order and the appropriate code indicating the disconnect reason must be applied. The second order (described below) must be referenced as the related order. The due dates on each order should be the same and must be at least one day later than the application date.

The second order is a change order on the new Resale Major Account. This change order adds the Major Account designation to the new Resale account. This order must also be noted to indicate no physical work is required. The first order must also be referenced as a related order and the due dates on each order should be the same. Again, the due date must be at least one day later than the application date. Once all the lines that are remaining as Resale are moved to the new Resale account, the next step is to convert the account to UNE-P. The account being migrated will need to have certain specific fields changed and/or added on the account. These fields are related to tax status, number of bills generated, and identification of the account as a UNE-P account; none of these fields are related to the PIC or a PC freeze. This completes the conversion of the account to a UNE-P account. The final action to occur is the addition of the appropriate S&E code to all the UNE-P lines via a mass change scrub.

Scenario 2

Scenario 2 applies when the customer requests only a small portion of their existing Resale services be migrated to UNE-P while the majority of their services are remaining as Resale. This scenario follows the same basic pattern as Scenario 1 except that the services being migrated to UNE-P are the ones that are removed from the existing Resale Major Account and placed on a new UNE-P Major account. Just as in Scenario 1, two orders are required and the same information is added or changed on the orders as in the previous scenario.

As the description of the process of the change from Resale to UNE-P indicates, the process does not involve in any way the PC freeze status. The PC freeze status is not an issue at all because the customer's provider is not changing. A change by the customer's provider from Resale to UNE-P should be transparent to the end user customer.

Certificate of Service Docket No. 011077-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail and (*) Hand Delivery on this 23rd day of May 2002 to the following:

AT&T (GA) Virginia C. Tate 1200 Peachtree St., NE Suite 8100 Atlanta, GA 30309

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thom S. ms

Susan S. Masterton