

ORIGINAL

2002 ALEC Data Request

undocketed

Legal company name: Sprint Communications Company Limited
Partnership

D/B/A:

FPSC company code (e.g., TX000): TX045

Contact name & title: F. Ben Poag

Telephone number: (850) 599-1027

E-mail address: ben.poag@mail.sprint.com

Florida Statute 364.02(2) defines basic local service as follows:

"Basic local telecommunications service" means voice-grade, flat-rate residential and flat-rate single line business local exchange services which provide dial tone, local usage necessary to place unlimited calls within a local exchange area, dual tone multi-frequency dialing, and access to the following: emergency services such as "911", all locally available interexchange companies, directory assistance, operator services, relay services, and an alphabetical directory listing. For a local exchange company, such terms shall include any extended area service routes, and extended calling service in existence or ordered by the commission on or before July 1, 1995.

1. Are you currently providing residential or business service to customers in Florida that complies with the above definition of **basic local service**? If yes, continue with Question #1; if no, continue with Question #2.

Response: Yes

- a) To how many residential customers are you providing **basic local service** in Florida and what are your current rates?

Response: None

- b) To how many business customers are you providing **basic local service** in Florida and what are your current rates?

Response: Sprint is providing basic local service in Florida to 203 customers. The current rate is \$29.70.

2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of **basic local service**? (Examples could include: multi-line business users; services with toll or usage restrictions; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc.) If yes, continue with question #2; if no, skip to question #3.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

Response: Yes

- a) Please describe each of the forms of local service you are providing to residential customers in Florida, where you are offering these services (e.g., in which cities or areas), and indicate your current rates.

Response: N/A

- b) Please describe each of the forms of local service you are providing to business customers in Florida, where you are offering these services (e.g., in which cities or areas), and indicate your current standard rates.

Response: These services are offered in the Orlando area at the following rates:

Basic	\$29.70
PBX	\$45.00
DS1	\$257.00
DS3	\$2457.00
ISDN	\$374.00
PRI	\$625.00
BRI	\$62.70

3. Do you actively market your local services to Florida residential customers?

Response: No

- a) If not, please explain why.

Response: To be profitable, a minimum of 5 lines per address is necessary.

- b) If so, in what geographic areas?

Response: N/A

- c) If so, what types of marketing do you use? Please check all that are applicable.

Newspaper
Radio
TV
Direct Mail
Telemarketing
Email
Website
Other (please specify)

5. Are you offering or providing voice over DSL (VoDSL) service? If so, in what exchanges or respective wire centers and at what price(s)? Is your service local, long distance, or both?

Response: No

6. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.).

Response: [REDACTED]

a) Please indicate, by exchange and respective wire center, the number of incumbent local exchange carrier (ILEC) access lines you are reselling to **residential** customers.

Response: [REDACTED]

b) Please indicate, by exchange and respective wire center, the number of ILEC access lines you are reselling to **business** customers.

Response: [REDACTED]

c) Please indicate, by exchange and respective wire center, the types of unbundled network elements, if any, you are obtaining from the incumbent ILEC.

Response: [REDACTED]

7. Referring back to your responses to question number 6, please provide by subpart (e.g., 6(g)), where applicable, the number of voicegrade equivalent lines that you are providing (e.g., 1 DS1 should be considered equivalent to 24 voicegrade lines).

Response:

[REDACTED]

- 8.
- a) Please indicate the number and location of switches you have located in Florida (if any) used to provide services to customers in Florida, identify whether they are circuit or packet switches, and identify the manufacturer.

Response: [REDACTED]

- b) Please indicate the projected number and location of circuit and packet switches that you expect to locate in Florida within the next five years.

Response: [REDACTED]

- c) If applicable, please indicate if and where you have deployed transport facilities, and describe the technology(ies) deployed.

Response: [REDACTED]

- 9.
- a) For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchanges is

attached) and respective wire center, the number of residential access lines served as of June 30, 2002.

Response: [REDACTED]

- b) For each exchange where you are providing any form of business local telephone service, please identify by exchange and respective wire center, the number of business access lines served as of June 30, 2002.

Response:
[REDACTED]

10. For billing and accounting purposes, do you differentiate between residential and business customers?

Response: All customers are business customers.

11. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.

Response: Sprint has encountered several significant barriers in entering Florida's local exchange Markets. The top three are summarized as follows:

- 1. Cumbersome ordering and provisioning process for unbundled network elements. While resale processes have improved over time, the process for purchasing unbundled network elements continues to be mostly a manual, labor intensive and administratively burdensome process.**
- 2. Installation intervals are a significant competitive challenge for a facilities based ALEC who also purchases unbundled network elements from an ILEC. Currently BellSouth provides unbundled loops to ALECs in 3 to 5 business days (depending on the type of loop) from the receipt of an order. When you add any time for the ALEC to process the order, a simple one line addition can take up to 7 days (with the addition of 2 days for order acknowledgement). Yet, BellSouth generally commits to a 2 or 3 day installation interval for their retail customers. Considering further that BellSouth is provisioning both the switch and loop facilities for its customers, it is unacceptable for BellSouth to take up to 7 days to provision the loop only to an ALEC.**
- 3. Obtaining the ability to connect Sprint's fiber facilities to multi-tenant buildings in order to serve customers has been a significant barrier to competition. While the property owners discuss many concerns on protecting their private property rights and the challenge of**

allowing multiple vendors into their buildings, Sprint's experience is that it is more often a question of compensation rather than property concerns. Sprint has attempted to negotiate acceptable fees to reimburse the property owners for their administrative and infrastructure concerns and found most property owners more interested in obtaining a share of the telecommunications company's revenue than they are in recovering their administrative and infrastructure costs.

12. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.

Response: Yes, BellSouth has refused to provision UNE loops to Sprint unless Sprint first certifies that the loops will carry a certain level of local voice traffic. Such a requirement is directly contrary to FCC rules and orders which provide that "in situations where the requesting carrier is collocated and has self-provisioned transport or obtained transport from an alternative provider, but is purchasing unbundled loops, that carrier may provide only exchange access over those facilities". (See FCC 99-238, Para 487). The FCC affirmed its position in paragraph 5 of the Supplemental Order (FCC 99-370) when it said "it [the FCC's constraints on converting Special Access circuits to EELs] also does not affect the ability of competitive LECs that are collocated and have self-provisioned transport (or obtained it from third parties), but are purchasing unbundled loops, to provide exchange access service". Sprint submitted a request, pursuant to Section 1.730(b) of the FCC's rules, that the Enforcement Bureau of the FCC accept for consideration under the Accelerated Docket Sprint's complaint against BellSouth. However, in the interim, Sprint's ability to conduct business in accordance with the FCC's rules has been stymied by BellSouth.

13. Please describe your long-term (5 years) business strategy, including whether you intend to change your method of provisioning (e.g., from resale/mixed to all UNEs to facilities-based).

Response: Sprint's long-term strategy for local service does not call for a change in the method of provisioning over the next 5 years.

Sprint plans to offer a mix of DSL services in Florida provided over its own facilities and via resale from third party DSL providers like Covad.

14. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned? For each code that you have been assigned as of June 30, 2002, please indicate how many numbers have been assigned and how many of those numbers have active status. If you have been assigned

NXX codes, please identify where they have been homed for rating and routing purposes.

Response: Please see attached confidential schedule of NXX codes assigned to Sprint.

15.

- a) At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn a service? If yes, please identify the service(s), prices, and exchange, and discuss the reasons for this decision.

Response: Yes, Sprint provided the following ION services in the Miami and Ft. Lauderdale areas.

Sprint ION xt1, which included 1 phone/fax line and 200 minutes of domestic long distance, was \$99.99 a month, plus a monthly \$5 line access charge.

Sprint ION xt2, which included 2 phone/fax lines and 400 minutes of domestic long distance, was \$119.99 a month, plus a monthly \$5 line access charge.

Sprint ION xt4, which included 4 phone/fax lines and 750 minutes of domestic long distance, was \$149.99 a month, plus a monthly \$5 line access charge.

Service was withdrawn in October 2001 because intense competition in the long distance sector diminished Sprint's ability to fund every possible growth strategy. The economic downturn, in conjunction with the impatience of the capital markets for long payback periods, also worked against continued development of these services.

- b) During the last 12 months, have you expanded your service offerings in Florida? If so, please list the new offerings, if they are residence or business (or both), their prices and the exchanges where you have offered the services.

Response: Yes, two business offerings have been added in the Orlando exchange:

T1 Bundle – starts at \$645

Frame Relay – starts at \$399

16.

- a) Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange

Response: Local service, long distance voice and data service

- b) If you are involved in providing cable television in Florida, do you offer any package plans combining cable television and local telephone services? If so, please indicate where such packages are being offered, and whether they are provided through your company itself, or an affiliate, or a business partner.

Response: N/A

- c) If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans, their terms and conditions, and when you began offering the plans. Is subscribing to both local telephone and long distance a condition of providing service?

Response: Yes, a T1 Bundle is offered, which includes local, dedicated IP and long distance, starting at \$645. The plan was first offered in June 2002. Subscribing to both local and long distance is a condition of providing service.

17. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on any major obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles. We are also seeking comment on alternative methods to evaluate the level of competition in Florida (e.g., use of E911 databases, etc.) as well as comments or information on intermodal local competition (e.g., wireless, cable telephony).

Response: Repair time for customers served via unbundled loop is excessive compared to customers who are served completely by Sprint's network. BellSouth's average repair time exceeds 8 hours for every service outage they are involved with. This has a negative impact on retaining these customers or growing services with these customers.

18. If your company filed a Form 477 with the Federal Communications Commission in March 2002, please enclose a copy of the completed Form 477 with your response to this data request.

Response: A copy of the completed Form 477 is enclosed with Sprint's response to this data request.

19. Please provide a copy of the most up-to-date information that your company has provided to Wall Street analysts for the period July 1, 2001 through June 30, 2002 that discusses the number of access lines you provide as an ALEC in Florida. If the numbers differ from what you are reporting to the Florida Public Service Commission, please explain the differences.

Response: Sprint has not provided any information to Wall Street analysts discussing the number of access lines provided as an ALEC in Florida.

20. For the year ending December 31, 2001, please identify your total revenue from local service, broken out by business and residence.

Response: [REDACTED]

21. As of December 31, 2001, how much money (in thousands of dollars) have you invested in your network?

Response: [REDACTED]

22. Has your company filed either Chapter 7 or Chapter 11 bankruptcy in the past, are you currently operating under Chapter 7 or Chapter 11 protection, or do you anticipate possibly filing for Chapter 7 or Chapter 11 bankruptcy? If so, please provide relevant dates and details about the filing, including which chapter.

Response: No

NPA-NXX	Assigned & Active	Homing Tandem CLI
[Redacted Content]		

FCC Form 477 -- Local Competition and Broadband Reporting

Cover Page - Name & Contact Information

All filers must complete this section.

File data as of: December 31, 2001

1. Filing status Meet broadband, local competition and wireless thresholds
2. Company Sprint Corporation
3. Indicate the category that best describes the operations covered by this filing.
Mobile Wireless
4. Filers must report separate data for ILEC and non-ILEC operations. Use the following drop-down box to indicate whether this worksheet contains data for ILEC or for non-ILEC operations.
non-ILEC operations
5. Use the following drop-down box to select your company, parent or controlling entity name. Select "not shown" if it is not in the list. See instructions Section IV-B-1 for information on preparing file names.
Sprint Corporation

If you selected "not shown" above, then provide the following:
Name of company, parent or controlling entity.
6. State. Florida
7. Contact person (person who prepared the data contained below).
Rikke Davis
8. Contact person telephone number and e-mail address.
phone 202-585-1919
e-mail rikke.davis@mail.sprint.com
9. Indicate whether this is an original or revised filing.
Original Filing
10. Indicate whether you request non-disclosure of some or all of the information in this file because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.
Filer certifies that some data in this report is privileged and confidential
11. If you requested non-disclosure in line 10, indicate if this is your complete or redacted file.
Redacted version of file

Please review instructions before completing form.

Reminders:

- 1) Ensure files are virus free by using up-to-date virus detection software. Filers are encouraged to submit files via e-mail (address: FCC477@fcc.gov).
- 2) If you are filing original or revised data for an earlier semi-annual reporting period, do not use this particular form (which is only for data as of December 31, 2001). See reminder 4.
- 3) You may not insert or delete columns or rows, move cells, or edit text or numbers outside the cells provided for data entries. Files that cannot be opened in EXCEL97, files whose structure has been altered, and files with improper names will have to be refiled.
- 4) If you have questions about the form, contact the Common Carrier Bureau, Industry Analysis Division at (202) 418-0940; via e-mail at 477INFO@fcc.gov; or via TTY at (202) 418-0484.
- 5) You must submit a Certification Statement signed by an officer of your company. A single statement may cover all files submitted. See Instructions sections IV & V.
- 6) If you request non-disclosure of some data, you must file a public version of the form with such information redacted. See Instructions sections IV.B and IV.C for information on preparing a redacted file.
- 7) Name your files as specified in Instructions section IV.B.1. To assist you, complete this Cover Page to generate an "example" name, below. Replace the character "#" in this example name with a sequence number as specified in the instructions. This number should be "1" unless using "1" would cause you to submit more than one file with the identical file name.

Example FLC#D01Sprint Corporation .XLS

OMB NO: 3060-0816

EXPIRATION DATE: 11/30/2003

Sprint Corporation non-ILEC operations for Florida December 31, 2001

Complete Part I if you and all affiliates (including commonly controlled entities) provide 250 or more broadband lines or wireless channels in the state over your own facilities or over lines you provisioned as broadband. See instructions for definitions of "own facilities", "broadband", "end user", and "residential and small business".

If you provide data in Part I, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the broadband services reported herein. See instructions.

Data as of December 31, 2001

A. Lines and wireless channels of broadband service that you provided over your own facilities, or over UNE loops or other lines and wireless channels that you obtained from other service providers and equipped as broadband, categorized by technology at the end-user location.

(a) Total one-way and two-way (full) broadband lines and wireless channels	Percentages of lines and wireless channels reported in (a)				
	(b) % of (a) used by residential & small business customers	(c) % of (a) provided over your own facilities	(d) % of (a) provided (i.e. billed directly) to end users	(e) % of (a) providing customers greater than 200 kbps in both directions	(f) % of (a) providing customers greater than 2 mbps in both directions
I - 1. Asymmetric xDSL.					
I - 2. Other traditional wireline including symmetric xDSL.				100%	
I - 3. Coaxial carrier systems including hybrid fiber-coaxial systems.					
I - 4. Optical carrier (fiber to the end user).					
I - 5. Satellite.					
I - 6. Terrestrial wireless fixed.	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
I - 7. Terrestrial wireless mobile.					
I - 8. All other technologies, such as distribution over electric power lines.					

Note: In Part I, report actual counts. Do not report voice-grade equivalent measures.

Sprint Corporation non-ILEC operations for Florida December 31, 2001

Complete Part II if you and all affiliates (including commonly controlled entities) provide 10,000 or more voice-grade equivalent lines or wireless voice-grade equivalent channels used for local exchange or exchange access service in the state. See instructions for definitions of "voice telephone service", "voice-grade equivalent lines", "residential and small business", "owned facilities", "COLO switching centers", and "end users".

If you provide data in Part II, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the wireline or fixed wireless voice grade services reported herein. See instructions.

	(a) Total voice-grade equivalent lines and voice-grade equivalent wireless channels in service	Percentages of lines and wireless channels reported in (a)			
		(b) % of (a) used for residential & small business service	(c) % of (a) provided over your own facilities	(d) % of (a) provided over UNE loops	(e) % of (a) in ILEC COLO switching centers
Data as of December 31, 2001					
A. Voice telephone service provided to end users.					
II - 1. Total lines and channels you provided to end users.	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
B. Voice telephone service provided to other communications carriers, categorized by:					
II - 2. Lines and channels that you provided under a Total Service Resale arrangement. See instructions.					
II - 3. Lines and channels you provided under other resale arrangements, such as resold Centrex.					
C. UNE loops, special access lines, and those private lines that connect to carriers, categorized by:	(a) Total lines and wireless channels				
II - 4. Lines and channels that you provided under a UNE loop arrangement, where you do not provide switching for the line.	XXXXXX				XXXXXX
II - 5. Lines and channels that you provided under a UNE loop arrangement, where you also provided switching for the line.					
II - 6. Special access lines not provided as broadband and private lines that connect an end-user premises to a telecommunications common carrier and is not provided as broadband.					
D. Total wireline voice-grade equivalent lines & fixed wireless voice-grade equivalent channels in service.					
II - 7. Total lines and channels provided. [line II-1+line II-2 + line II-3]	#VALUE!				100%

Percentage of channels reported in (a), carried over the following types of facilities categorized by the technology used in the part of the line or wireless channel at the end-user location		
(f)	(g)	(h)
Cable coaxial	Wireless	All other including traditional wireline

Sprint Corporation non-ILEC operations for Florida December 31, 2001

Complete Part III if you and all affiliates (including commonly controlled entities) serve 10,000 or more mobile voice telephony subscribers in the state over your own facilities. See instructions for definitions of "mobile voice telephony subscribers" and "owned facilities".

Data as of December 31, 2001

A. Mobile voice telephony subscribers in service and served over your own facilities.

(a) Network telephone service subscribers	(b) Percentage of (a) provided (i.e. billed directly) to end users
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III - 1. Cellular, PCS & other mobile telephony.

XXXXXX

XXXXXX

Sprint Corporation non-ILEC operations for Florida December 31, 2001

Filers completing Part I or Part II must supply a list of 5-digit Zip Codes in which the filer has at least one customer. Do not provide customer counts by Zip Code.

Data as of December 31, 2001

V - 1. 5-digit Zip Codes in the state in which you provide service to end-user locations:

(a) Broadband service	(b) Wireline & fixed wireless exchange telephone
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1	32901	32701
2	32903	32714
3	32904	32746
4	32905	32751
5	32907	32765
6	32908	32773
7	32909	32789
8	32920	32801
9	32922	32802
10	32926	32803
11	32931	32804
12	32934	32805
13	32935	32806
14	32937	32807
15	32940	32808
16	32949	32809
17	32950	32810
18	32951	32811
19	32952	32812
20	32953	32813
21	32955	32814
22	32976	32815
23		32817
24		32818
25		32819
26		32820
27		32822
28		32824
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31		32827
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33		32835
34		32837