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March 7, 2003

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. 990649B-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Report of Sprint-Florida, Incorporated on Electronic Loop Qualifications Offering.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
Pricing of Unbundled Network
Elements (Sprint/Verizon Track)
_____/

DOCKET NO. 990649B-TP
FILED: March 7, 2003

REPORT OF SPRINT-FLORIDA, INCORPORATED ON ELECTRONIC LOOP QUALIFICATION OFFERING

Sprint-Florida, Incorporated (Sprint) respectfully submits the following report as ordered by the Florida Public Service Commission in Docket No. 990649B-TP, Order No. PSC-03-0058-FOF-TP, issued January 8, 2003. Through this report, Sprint will demonstrate that there exists a misunderstanding of the facts concerning parity between Sprint wholesale and retail operations related to loop qualification. This report contains a detailed comparison which shows that the process for wholesale loop qualification is the same as the process for retail loop qualification thus demonstrating parity. Also in this report, Sprint will introduce a recent enhancement with the Integrated Entry Request System (IRES), which benefits the ALEC community by lowering its cost for loop qualification. This report contains an explanation why further enhancements in Sprint's wholesale/retail loop qualification process would not be prudent from a business perspective and that Sprint's current process for wholesale/retail loop qualification contains the best processes fiscally available. Finally, based upon this analysis, there is no basis for the Commission's requirement that Sprint provide "an electronic loop qualification offering."

I. BACKGROUND

In Docket No. 990649B-TP, Order No. PSC-03-0058-FOF-TP, issued January 8, 2003, the Florida Commission found that "Sprint shall be required to implement an electronic loop

qualification offering" and "Sprint shall be required to report within 60 days of the order in this docket becoming final, when and how it will have an electronic loop qualification offering in place." This decision was based on the mistaken conclusion that Sprint and the ALEC community do not have comparable access to Loop Make Up (LMU) information as required by ¶ 429 of the FCC's UNE Remand Order. This is simply not true. Sprint's loop qualification process used to provide ALECs with LMU information is identical to the loop qualification process used for its own customers in the deployment of high-speed data (HSD) services.

II. PARITY IN ACCESS TO LOOP QUALIFICATION INFORMATION

There is no question that the incumbent LEC is required to provide the ALEC with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent so that the requesting carrier can make an independent judgment about whether the loop is capable of supporting advanced services equipment the requesting carrier intends to install. UNE Remand Order at ¶¶ 426-429. In addition, the UNE Remand Order requires that an incumbent LEC that has manual access to this sort of information for itself, or any affiliate, must also provide such manual access to a requesting competitor on a nondiscriminatory basis. Id. At ¶ 429. As outlined in Exhibit 1, Sprint's loop qualification process provided to ALECs is identical to the process used for its own customers. Both ALECs and Sprint retail customers may check DSL qualification on the Sprint website or by contacting a sales representative. A loop makeup is performed using Customer Loop Assignment System (CLAS) and Engineering Work Order (EWO) records for both ALECs and retail customers. Electrical parameters are obtained from the AccessCare test results, and potential disturbers are manually identified by researching CLAS and EWO records. Every step in the loop qualification process is identical.

A. WHOLESALE LOOP MAKEUP PROCESS

Just like a retail customer, ALECs may contact a sales agent to determine HSD service availability or they may access the Sprint website (24X7). Service availability is determined by the following information:

- Maximum Engineered Data Rate (MEDR) – refers to the maximum downstream data rate available after line conditioning,
- As Is Data Rate (AIDR) – refers to the maximum downstream data rate that could be supported by a loop in its current condition, prior to any conditioning , and
- Loop Length in kilofeet.

The Sprint website and the Customer Inquiry screen used by the sales agents access the MEDR, AIDR and loop length which are populated in CLAS. This service availability information is provided at no charge.

Sprint uses the same loop makeup process for retail customers to provide the ALEC with the underlying loop qualification information including loop length by gauge, the presence of load coils and bridge taps, and location of bridge taps. As described in Attachment A, Diagrams A-1 through A-3, the ALEC can request a loop qualification via IRES due to the recent enhancement.

IRES generates a service order that is transmitted to the appropriate Field Team Engineer. The Field Team Engineer will determine the following loop characteristics: loop length by gauge, total footage in kilofeet, presence of any load coils or bridge taps. This information is extracted from Sprint's underlying EWO system and CLAS. The MapViewer Loop Makeup software program is used to trace the loop from the end user premises to the central office. If, during the loop trace, a cross-connect is encountered, the Field Team Engineer must go back to

the telephone-number-specific information in CLAS to determine the next cable in order to restart the loop makeup and continue the trace. This represents one of the many manual steps involved in Sprint's wholesale/retail loop qualification process.

The Field Team Engineer will also run a loop test to obtain electrical parameters, and will manually review CLAS and EWO records for potential disturbers. Using the information generated by the MapViewer Loop Makeup reports, the loop test results, and the review of CLAS and EWO records for disturbers, the data is uploaded to the Service Order Entry system and routed back to IRES for viewing by the ALEC.

B. RETAIL LOOP MAKEUP PROCESS

As described in Attachment B, Sprint's retail high-speed data services offering begins with a determination of service availability. The MEDR, AIDR and loop length are generated and populated in CLAS. Sales agents use this information to qualify customers for HSD product inquiries. This information is also used to provide a qualification response to HSD product inquiries on the Sprint website (24X7). See Diagrams B-1 through B-3 on Pages 1 and 2.

Once an order is placed for HSD services, the responsible Field Team Engineer completes a loop makeup to identify any impediments that will not allow the service to work properly. The Field Team Engineer uses the same loop makeup process as used for wholesale services to determine the following loop characteristics: loop length by gauge, total footage in kilofeet, presence of any load coils or bridge taps. The Field Team Engineer will also run a loop test to obtain electrical parameters, and will manually review CLAS and EWO records for potential disturbers.

III. ELECTRONIC ACCESS TO DATABASES

The Commission stated that "we find that Sprint's loop qualification information currently resides in databases which Sprint's personnel can access electronically." The Commission's decision is based upon the erroneous belief that "Sprint's personnel retrieve loop makeup information from various databases. Specifically, it appears that the information that is gathered is obtained from MapViewer, Teradyne 4-Tel and Nortel Networks' CALRS (Centralized Automated Loop Reporting System), each of which appears to be some type of database." (Order No. PSC-03-0058-FOF-TP, Page 193) However, Sprint does not have one database that contains ALL of the information required to be provided to the ALECs for loop qualification. There is a significant difference between a database, a program, and a system. A database is a collection of data arranged for ease and speed of retrieval. A program is a procedure or set of procedures for solving a problem, including data collection and processing and presentation of results. A system is a group of interrelated and interacting programs.

As shown in Exhibit 2, Sprint uses many different systems, programs and databases to manually gather loop makeup information. Some programs, such as MapViewer's Loop Makeup, do not store results in a database as the underlying network information (EWO) is not static but rather is constantly changing as the network changes on a daily basis. MapViewer, for example, requires manual intervention when a loop trace encounters a cross connect. In fact, the entire loop makeup exercise requires manual intervention and involvement. As demonstrated by Attachment A, steps 5 (Page A-4) through 23 (Page A-21) require the hands-on involvement of the Field Team Engineer using information and records electronically stored. As noted in Attachment B, these are the very same steps and systems used on Sprint's retail side for a high speed data service.

IV. COST OF ELECTRONIC LOOP QUALIFICATION

Although Sprint disagrees that the development of an Electronic Loop Qualification is warranted, Sprint has researched how this could be accomplished, the cost of development, and the associated business realities. See Attachment C.

Loop makeup has three basic components:

1. Physical Loop Attributes – loop length, gauge of cable and location (aerial, buried or underground), existence of bridge taps, load coils and repeaters. This information resides in two Sprint systems, CLAS and EWO. A process could be developed to access these systems electronically to extract those loop attributes required for qualification and provide the data via a secure interface (See Section V). Based on estimates provided by Byers' Engineering and Sprint's internal IS departments, the estimated cost is $455,000.

2. Electrical Parameters – AC/DC voltage, resistance and capacitance values. Resistance is the opposition to the flow of electric charge and is measured in ohms. Capacitance is an electrical measurement that must be the same for both conductors of a pair and is measured in microfarads (uF). This information is obtained through Nortel's AccessCare. AccessCare is a management operating support system (OSS) that interfaces with loop testing equipment. A web-based front end could be developed to allow ALECs to test any Sprint working telephone number. The web-based front end would be required to provide protection of data via a secure interface (See Section V). Based on Sprint's internal IS department, the estimated cost is $65,000.

3. Presence of Disturbers – special service circuits, T-1 circuits, which disturb xDSL-type services if located in same or adjacent binder groups. Sprint currently does not have a database of T-1 special service circuits to be able to identify potential disturbers to xDSL service. Currently, the Field Team Engineer, who is knowledgeable of the network in the assigned region, reviews CLAS and EWO records to manually identify those circuits. Sprint has no plans to conduct such an expansive inventory for either retail or wholesale services at this time.

Sprint's nation-wide demand for LMU has averaged 4,105 inquiries per year and Florida averaged 900 inquiries per year, or 22% of the national total. With the total enhancement cost of $520,000, when spread over three years, the cost of automating the physical loop attributes and electrical parameter access would be $55.47 per inquiry nation–wide. This cost does not include disturber information. From Sprint's UNE cost filing the cost to investigate the presence of disturbers is $3.47 per inquiry. The total loop makeup cost, consisting of automated physical loop attributes and electrical parameters combined with the existing manual investigation of disturbers is $58.94 per loop qualification. See Attachment C. Sprint currently offers loop makeup to wholesale customers, using the same efficient process as its retail business, for the price of $24.26 per loop qualification after adjusting for the IRES enhancement.

V. PROTECTION OF DATA

Providing electronic access to Sprint's core systems raises security and protection of data issues and associated resulting cost issues. The overall theme of the FCC's rules on loop qualification is to provide an ALEC with the information needed to make an independent assessment on whether loop characteristics are compatible with the service the ALEC intends to provide. The loop characteristics data cannot be filtered or digested, and the incumbent is not

required to provide MORE than what is sufficient. Sprint's electronic plant records contain far more than data specific to loop qualification. Upon entering Sprint's systems, the user is not limited to information that is specific to a particular customer.

Sprint's electronic plant records contained in EWO and CLAS do indeed provide customer/location-specific information on the types and quantities of services that Sprint provides to ALL customers, including other ALEC information. Giving ALECs access to these systems as they exist would compromise Sprint's ability to protect Customer Proprietary Network Information (CPNI), as it is obligated to do so by the Telecom Act, ¶ 222(f), unless the ALEC has a Letter of Authorization from the customer.

To comply with the Commission's order to provide loop qualification information in an end-to-end electronic manner would require Sprint to add security to the existing systems which will restrict an ALEC's query to loop qualification data to customer(s) for which it has a letter of authorization. Providing only the required loop qualification information for a specific customer in an end-to-end electronic manner would require Sprint to conduct an inventory of its plant records, segregate loop qualification information (analogous to cataloging), and make available to ALECs through an Operating Support System (OSS) which it currently does not have for its own use. This is clearly not required by the FCC. The FCC's UNE Remand Order, ¶ 429, states, "We disagree, however, with Covad's unqualified request that the Commission require incumbent LECs to catalogue, inventory, and make available to competitors loop qualification information through automated OSS even when it has no such information available to itself. If an incumbent LEC has not compiled such information for itself, we do not require the incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers."

VI. SPRINT'S CURRENT PROCESS AND LMU RATE

Sprint proposes an adjusted rate of $24.26 for a loop qualification request. See page C-4 of Attachment C. Sprint's recent enhancement to IRES has eliminated the manual processing of loop qualification requests. The loop qualification request can be entered into IRES, generate a service order, and systematically route to the appropriate field team to complete the loop makeup. Sprint filed a $37.55 loop qualification rate in its NRC cost study. (Docket No. 990649-TP, Composite Exhibit 2, Volume II, Section IX – NRC, Pages 22-23 of 74.) Sprint proposes to eliminate the National Exchange Access Carrier (NEAC) cost component of $13.29 from the filed $37.55 rate for an adjusted loop qualification rate of $24.26. This rate includes all three components of loop makeup: physical loop attributes, electrical parameters, and the presence of disturbers. The current process is identical to the process to complete a loop makeup for retail customers. The cost to automate the retrieval of the physical loop attributes and electrical parameters would increase the LMU rate to $55.47 per loop makeup and does not include disturber information. Therefore, Sprint's current loop qualification process is the most efficient and least cost method at this time.

VII. CONCLUSION

Based on the foregoing analysis, Sprint submits the following conclusions:

1. Sprint currently is providing ALECs with the same level of access to loop makeup information that is available to Sprint's retail business using the same systems and processes.
2. Sprint's wholesale loop makeup process is at parity with its retail loop makeup process.

3. Sprint-Florida's revised $24.26 loop makeup rate is more economical than the $58.94 which would be incurred to provide electronic access to the physical loop attributes and electrical parameters and manual research for disturber information.

4. Sprint has no plans to develop and implement electronic loop qualification for either retail or wholesale at this time. If and when Sprint does implement an economically efficient electronic offering, Sprint will gladly offer it to ALECs.

Therefore, Sprint requests the Commission to relieve Sprint from the requirement to provide an electronic loop qualification offering and approve Sprint's revised loop makeup process with an associated non-recurring charge of $24.26, which includes only the field team time to identify the physical loop attributes, obtain electrical parameters, and research potential disturbers.

Respectfully submitted this 7th day of March, 2003.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, hand delivery (*) or U. S. Mail this 7th day of March, 2003, to the following:

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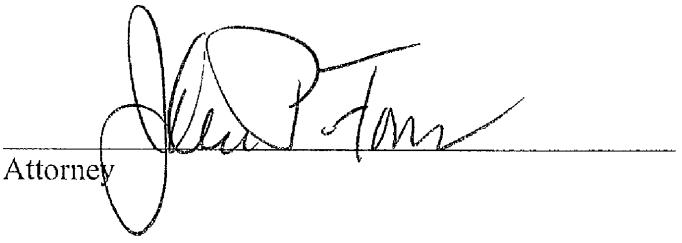

Attorney

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SPRINT'S WHOLESALE AND RETAIL DATA SERVICES
Loop Qualification Process

WHOLESALE DATA SERVICES		RETAIL DATA SERVICES	
STEP	DESCRIPTION	STEP	DESCRIPTION
1	ALEC contacts Sprint service center or sprint.com to determine qualification for DSL services. ALEC may obtain actual MEDR/AIDR rates by calling the Sprint service center. (OPTIONAL)	1	Customer contacts Sprint service center or sprint.com to determine qualification for DSL services.
2	ALEC places order for Loop Makeup Information Request via IRES or FAX.	2	Customer places order for DSL services.
3	Field Team Engineer performs Manual Loop Makeup.	3	Field Team Engineer performs Manual Loop Makeup.
3A	Field Team Engineer identifies terminal IPID of the customer's loop in CLAS.	3A	Field Team Engineer identifies terminal IPID of the customer's loop in CLAS.
3B	Field Team Engineer runs MapViewer Loop Makeup program to trace the loop from end user premises to central office.	3B	Field Team Engineer runs MapViewer Loop Makeup program to trace the loop from end user premises to central office.
3C	Field Team Engineer runs loop test via AccessCare to obtain electrical parameters; requires Sprint Working Telephone Number and availability of AccessCare.	3C	Field Team Engineer runs loop test via AccessCare to obtain electrical parameters; requires Sprint Working Telephone Number and availability of AccessCare.
3D	Field Team Engineer reviews CLAS and EWO records to manually identify potential disturbers.	3D	Field Team Engineer reviews CLAS and EWO records to manually identify potential disturbers.
4	ALEC places order for DSL loop and requests conditioning based on loop makeup results, if needed.	4	Field Team Engineer reviews Loop Makeup report to determine conditioning requirements, if needed.
5	Field Team Engineer initiates conditioning process as requested by ALEC.	5	Field Team Engineer initiates conditioning process based on loop makeup results.
6	Service is activated and order is closed.	6	Service is activated and order is closed.

MEDR Maximum Engineered Data Rate
AIDR As-Is Data Rate
IRES Integrated Request Entry System
CLAS Customer Loop Assignment System
EWO Engineering Work Order System

SUMMARY OF SPRINT'S OPERATIONAL SUPPORT SYSTEMS
In Support of Loop Qualification

ACRONYM	TITLE	TYPE	DESCRIPTION
AC	AccessCare	System	Nortel metallic loop testing system that provides remote test capability through field-mounted TollGrade Digitest Units as well as most of Sprint's legacy test systems, such as CALRS, 4-Tel, and switch-based testing through a single Operational Support System (OSS).
ARC	Automated Routing & Completion	System	ARC is a machine-to-machine system responsible for the routing of all SOE service orders, plus the automatic completion of non-fielded visit orders. ARC determines what destination should receive a copy of each service order and how it is received, via IMS print, TCP/IP Sockets, TCP/IP FTP, email, LAN or FAX.
CALRS	Centralized Automated Loop Reporting System	System	Nortel dial-in testing system; no longer supported by Nortel.
CLAS	Customer Loop Assignment System	System with Multiple Databases	CLAS is a system which provides automated assignment of facilities through service and repair order processing. Physical equipment assigned by the system includes central office equipment, terminal, cable & pair, and other miscellaneous equipment. CLAS maintains four databases: Cable Terminal, Cable Pair, Central Office Lines, and Willserve. The CLAS system performs maintenance, inquiry and ordering functions.

Exhibit 2

SUMMARY OF SPRINT'S OPERATIONAL SUPPORT SYSTEMS
In Support of Loop Qualification

ACRONYM	TITLE	TYPE	DESCRIPTION
EWO	Engineering Work Order	System	Core OSP engineering system. Engineering design tool that maintains the master network model through the work order process. Each time an engineer designs a work order, it is validated and posted back to the master model.
IRES	Integrated Request Entry System	System (Web-based)	Web-based order entry system for CLEC resale and UNE services.
	MapViewer	Program	OSP facility viewing tool. Software used with EWO to locate maps, attach and detach adjacent maps, add redline text, elements and features, search for text, display attributes of an element, run loop makeups and print.
NIDA	Network Integrated Data Architecture	System	Integrated system which receives data from the various OSS and sends "integrated" data back to some of these distributed systems.
SOE	Service Order Entry	System	Sprint's core order entry system.
SPICE	Sprint Intelligence Computing Environment	System	Sprint's front-end interface to the Service Order System.
	4-Tel	System	Teradyne testing system.

Attachment A

Wholesale Data Services

Overview

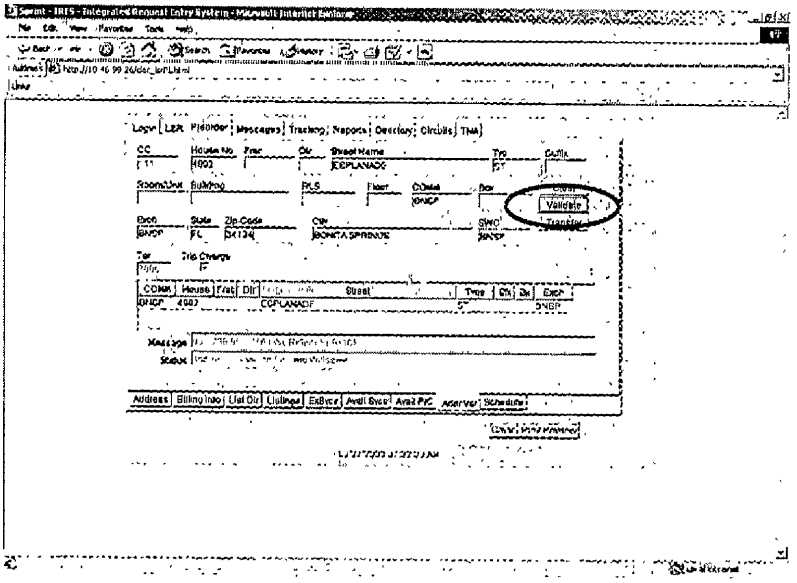
This document will describe the wholesale qualification process for DSL (Digital Subscriber Line) services.

Service Availability

A CLEC may access the Sprint website to check the high speed data service availability on any Sprint working telephone number. The CLEC may also contact a sales agent in the business office to check service availability or to obtain the underlying data rate information used to determine service availability. See Attachment B Diagrams B-1 through B-3.

Loop Qualification Process

The following table outlines the loop qualification process.

Step	Action
1	The CLEC accesses the Integrated Request Entry System (IRES) and selects the Preorder tab, enters the end user customer's address and selects the Validate button.  Diagram A-1 NOTE: IRES validates the service address.

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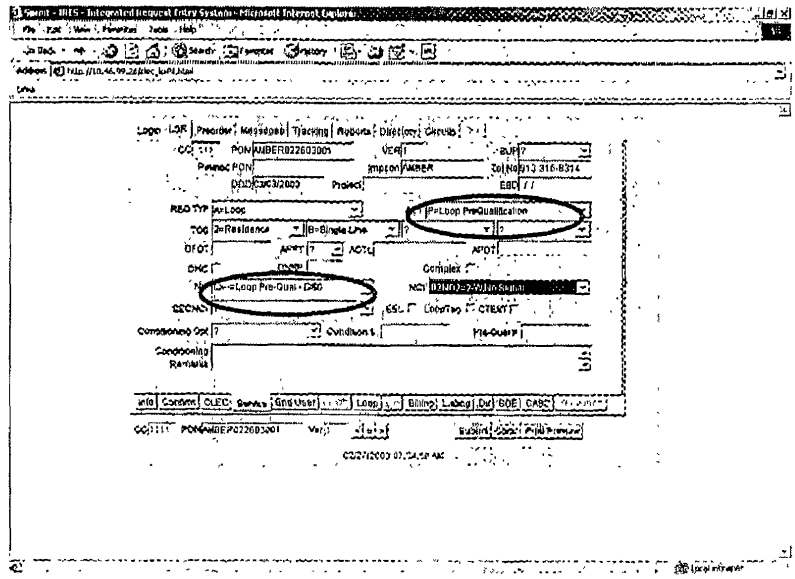
Loop Qualification Process (continued)

Step	Action
2	The CLEC then selects Transfer and opens the LSR Service tab and orders Loop Qualification.  Diagram A-2

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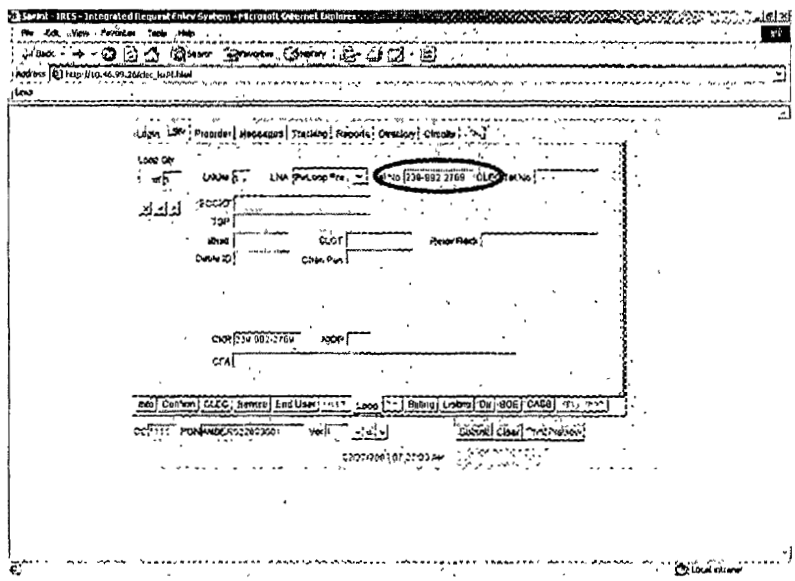
Loop Qualification Process (continued)

Step	Action
3	The CLEC then selects the LSR Loop tab and enters the working telephone number, if known, and then selects Submit button to generate a Service Order.  Diagram A-3
4	The Service Order Entry (SOE) routes the service order to the regional field team. The *Field Team Engineer* retrieves the order from the Automated Routing & Completion (ARC) queue.

Continued on next page

Loop Qualification Process (continued)

Step	Action
5	The *Field Team Engineer* obtains the customer's feed terminal IPID and associated cable(s) and pair(s) by accessing the Telephone Number Inquiry screen in CLAS.

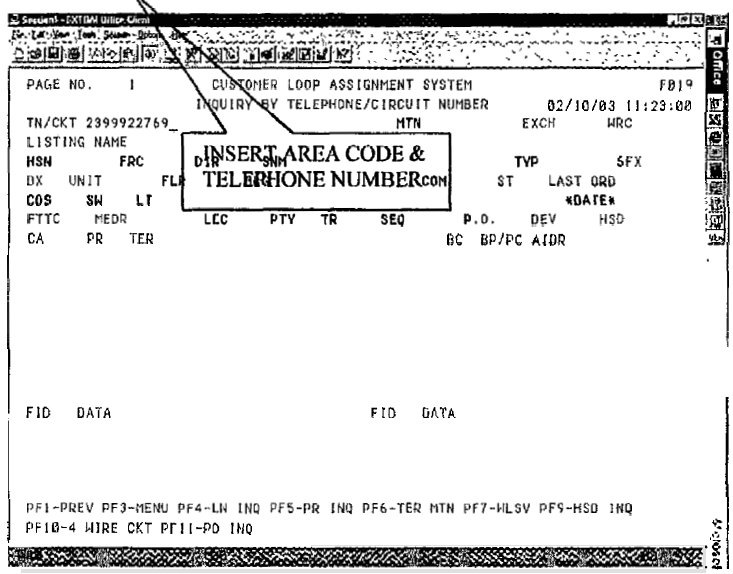


Diagram A-4

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Loop Qualification Process (continued)

Step	Action
6	The *Field Team Engineer* records the cable (CA) and pair (PR).

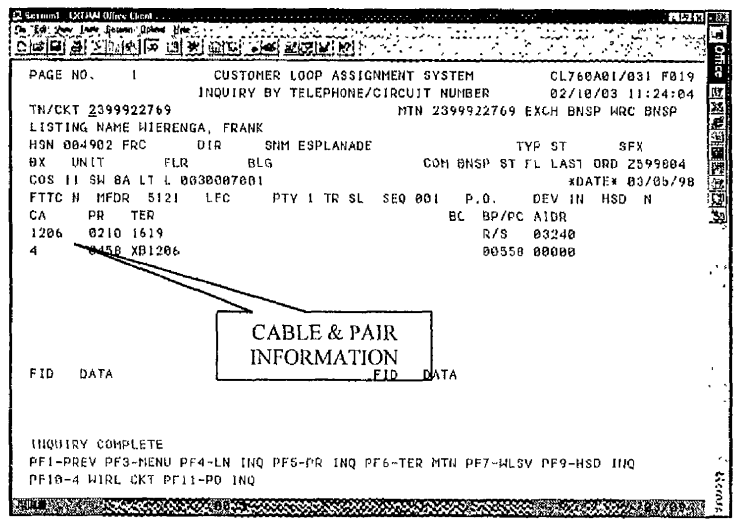

Diagram A-5

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Loop Qualification Process (continued)

Step	Action
7	Information required to perform a loop makeup includes all associated cables, pairs and the IPID of the terminal where the customer service wire connects to Sprint's facilities. The *Field Team Engineer* locates the terminal IPID on the next screen.

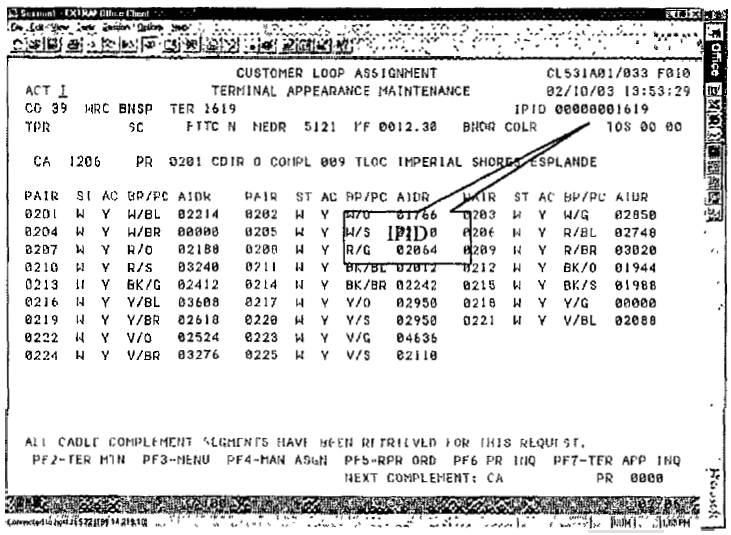

Diagram A-6

NOTE: An IPID number is automatically assigned by the EWO design system. Each item of plant is assigned a unique number when placed by the engineer while using the design program.

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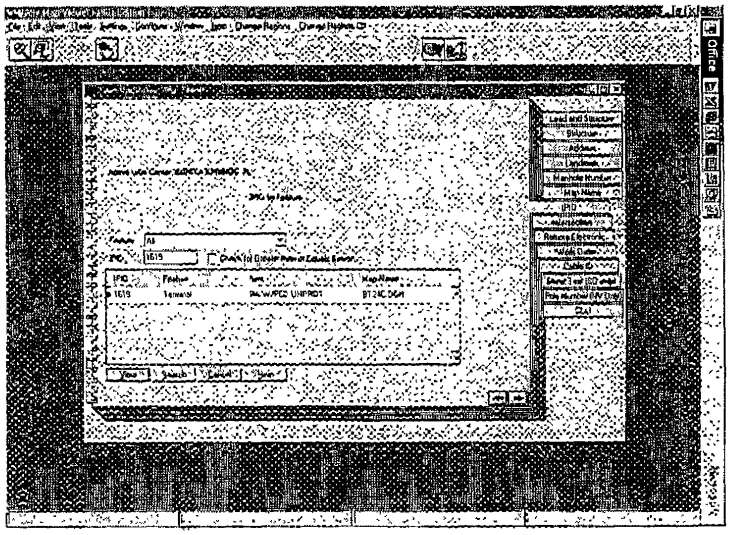
Loop Qualification Process (continued)

Step	Action
8	The *Field Team Engineer* then opens the MapViewer program to perform a search for the terminal by IPID and selects to view the terminal.  Diagram A-7

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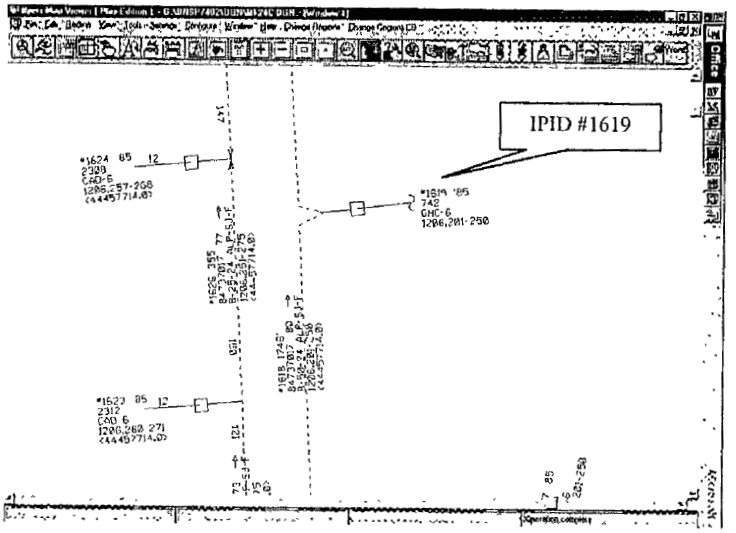
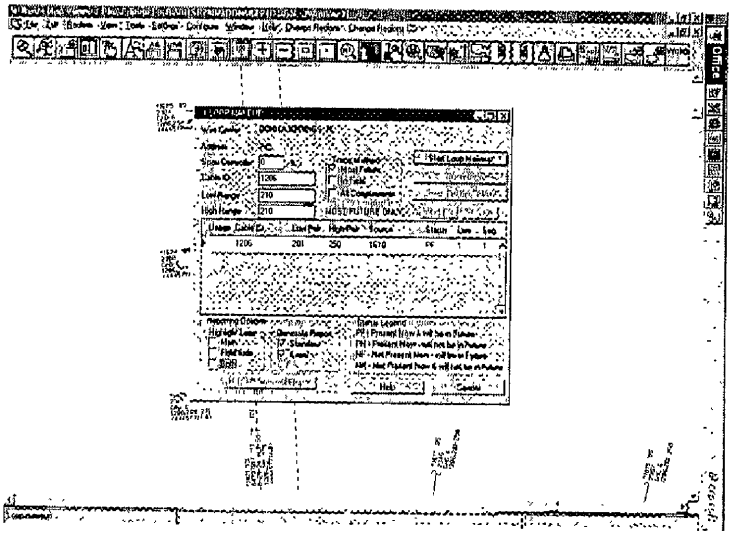
Loop Qualification Process (continued)

Step	Action
9	The next screen in MapViewer displays the customer's feed terminal and features located in that vicinity.  Diagram A-8

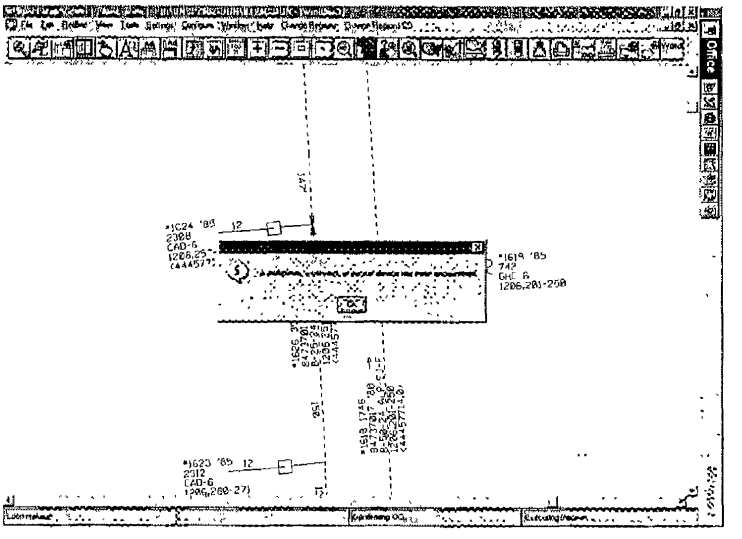
Continued on next page

Loop Qualification Process (continued)

Step	Action
10	The *Field Team Engineer* selects the Loop Makeup program from the MapViewer toolbar and enters the customer's cable and pair.  Diagram A-9

Continued on next page

Loop Qualification Process (continued)

Step	Action
11	The message on this screen informs the *Field Team Engineer* that the loop makeup has successfully run from the customer terminal to a cross-connect device. The *Field Team Engineer* selects "OK" and the program goes to the cross connect device as indicated in the drawing.  Diagram A-10

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Loop Qualification Process (continued)

Step	Action
12	The *Field Team Engineer* then selects the appropriate cable and pair from the cross-connect to the central office and selects "Continue" to complete the loop makeup process.

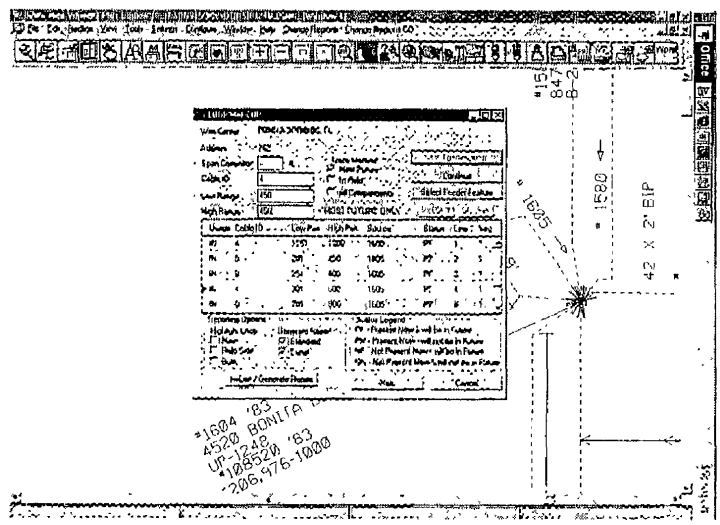
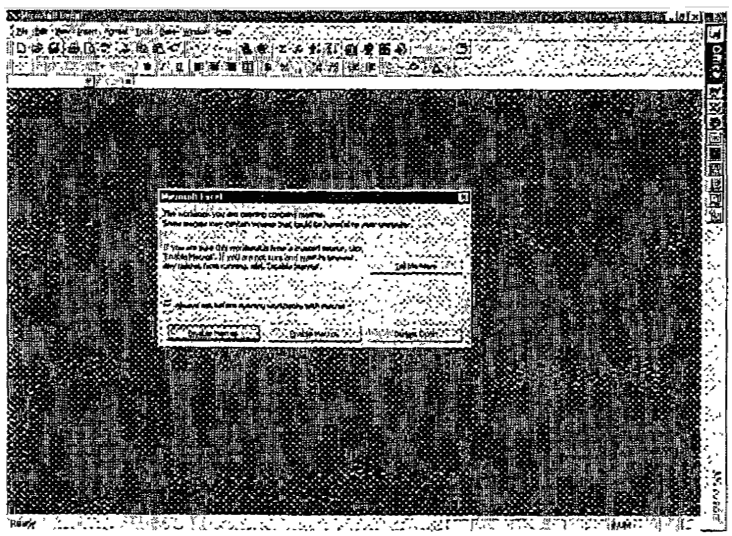


Diagram A-11

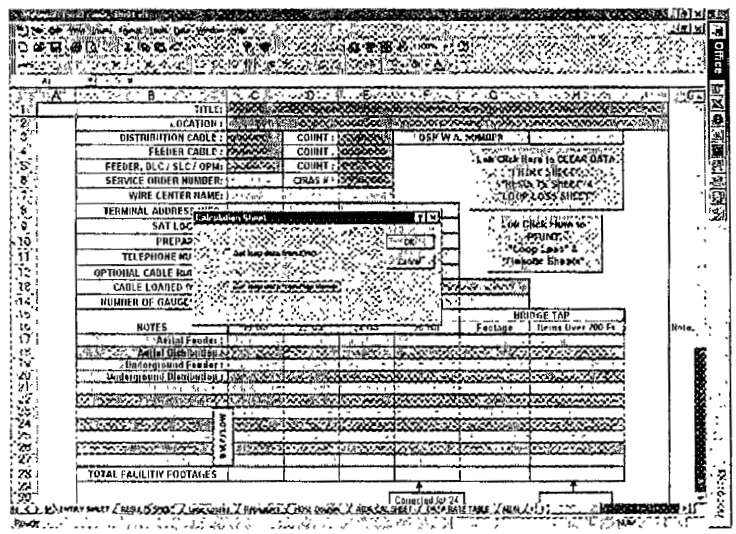
Continued on next page

Loop Qualification Process (continued)

Step	Action
13	The message on this screen informs the *Field Team Engineer* that the loop makeup has terminated at the central office. The *Field Team Engineer* selects "Enable Macro" to initiate the reporting process.  Diagram A-12

Continued on next page

Loop Qualification Process (continued)

Step	Action
14	The *Field Team Engineer* then selects "Get loop data from Map Viewer" to generate the loop makeup reports.  Diagram A-13
15	MapViewer generates two reports. The first report provides a quick reference to determine if the customer's circuit will qualify for DSL services without further engineering efforts.

Continued on next page

Loop Qualification Process (continued)

Step	Action
16	Tab 1 of the first report provides the results of the loop makeup, by gauge of wire and total footage, and bridge taps.

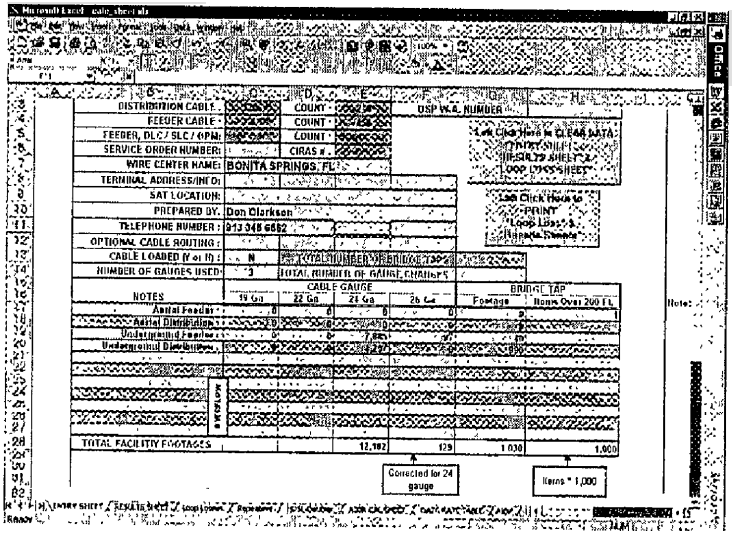


Diagram A-14

Continued on next page

Loop Qualification Process (continued)

Step	Action
17	Tab2 of the first report provides the Total Effective Loop Length, AIDR and MEDR.

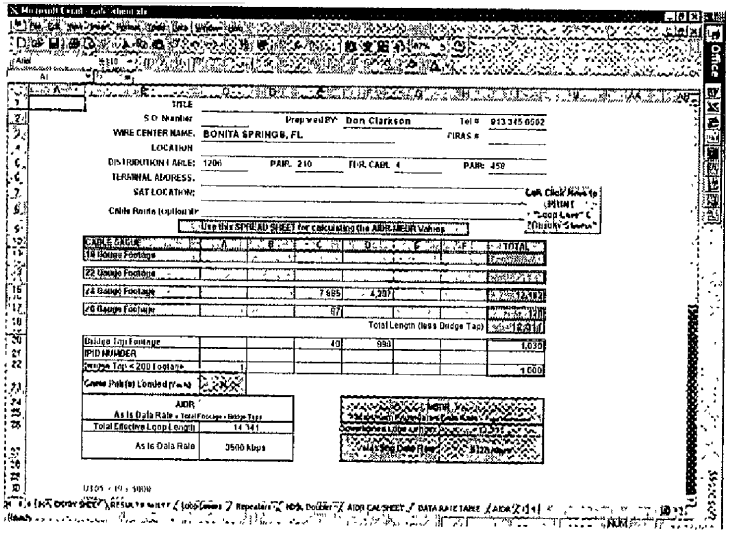
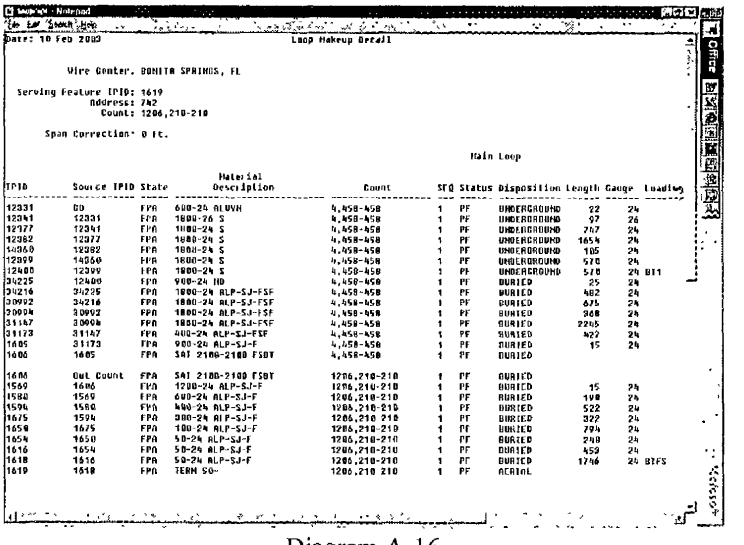


Diagram A-15

Continued on next page

Loop Qualification Process (continued)

Step	Action
18	The second report generated by MapViewer provides the results of the entire loop and is used as an engineering tool for grooming or conditioning the circuit when required. Every cable IPID used in the path of the loop makeup from the customer's terminal to the central office is reported, along with cable size, length of each section of cable, cumulative footage and whether the cable is buried, aerial or underground.



Date: 10 Feb 2009 — Loop Makeup Detail

Wire Center, BONITA SPRINGS, FL

Serving Feature IPID: 1619
Address: 742
Count: 1206,210-210

Span Correction: 0 ft.

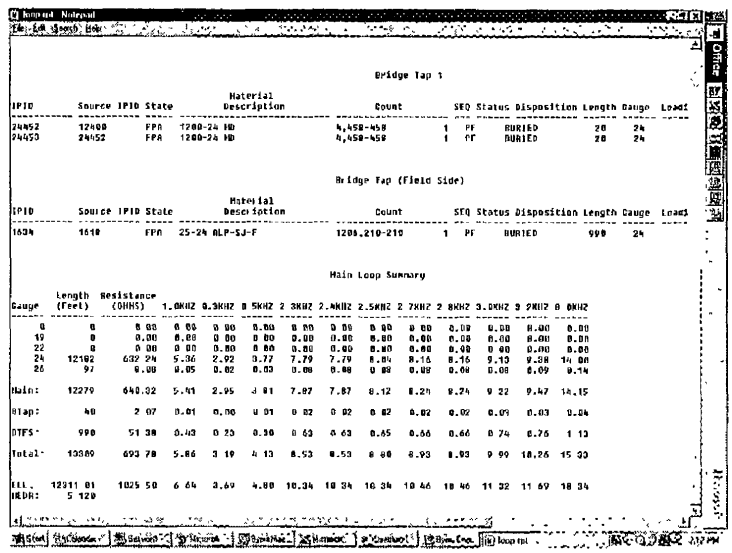
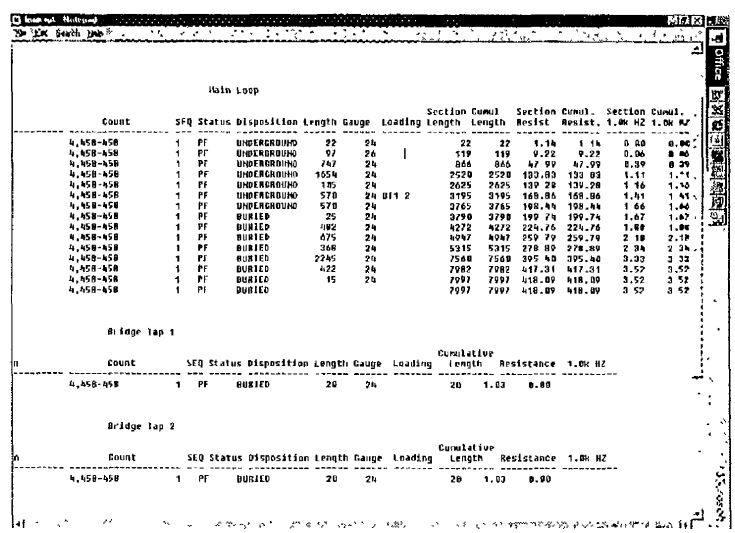
Main Loop

IPID	Source IPID	State	Material Description	Count	SEQ	Status	Disposition	Length	Gauge	Loading
12331	00	FPA	600-25 ALUVH	4,458-458	1	PF	UNDERGROUND	22	24	
12341	12331	FPA	1800-26 S	4,458-458	1	PF	UNDERGROUND	97	26	
12377	12341	FPA	1400-24 S	4,458-458	1	PF	UNDERGROUND	747	24	
12382	12377	FPA	1400-24 S	4,458-458	1	PF	UNDERGROUND	1654	24	
14860	12382	FPA	1800-24 S	4,458-458	1	PF	UNDERGROUND	105	24	
12899	14860	FPA	1800-24 S	4,458-458	1	PF	UNDERGROUND	570	24	
12400	12399	FPA	1800-24 S	4,458-458	1	PF	UNDERGROUND	570	24	BIT
34225	12400	FPA	900-24 HD	4,458-458	1	PF	BURIED	25	24	
34216	34225	FPA	1800-24 ALP-SJ-FSF	4,458-458	1	PF	BURIED	482	24	
30992	34216	FPA	1800-24 ALP-SJ-FSF	4,458-458	1	PF	BURIED	675	24	
30994	30992	FPA	1800-24 ALP-SJ-FSF	4,458-458	1	PF	BURIED	968	24	
31167	30994	FPA	1800-24 ALP-SJ-FSF	4,458-458	1	PF	BURIED	2265	24	
31173	31167	FPA	400-24 ALP-SJ-FSF	4,458-458	1	PF	BURIED	422	24	
1605	31173	FPA	900-24 ALP-SJ-F	4,458-458	1	PF	BURIED	15	24	
1606	1605	FPA	SAI 2100-2100 FSBT	4,458-458	1	PF	BURIED			
1606	Out Count	FPA	SAI 2100-2100 FSBT	1206,210-210	1	PF	BURIED			
1569	1606	FPA	1200-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	15	24	
1580	1569	FPA	600-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	198	24	
1594	1580	FPA	400-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	522	24	
1675	1594	FPA	300-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	322	24	
1650	1675	FPA	100-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	794	24	
1654	1650	FPA	50-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	240	24	
1616	1654	FPA	50-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	450	24	
1618	1616	FPA	50-24 ALP-SJ-F	1206,210-210	1	PF	BURIED	1740	24	BTFS
1619	1618	FPA	TERM 50-	1206,210-210	1	PF	AERIAL			

Diagram A-16

Continued on next page

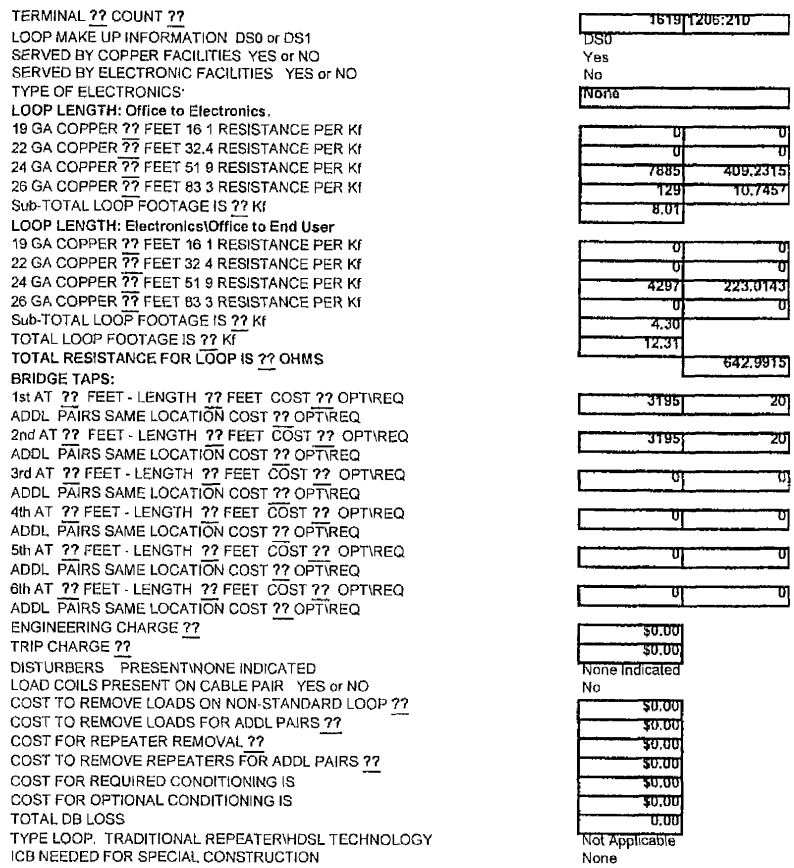
Loop Qualification Process (continued)

Step	Action
19a	The lower half of the report provides information on the bridge taps, including the IPID of each.
	
	Diagram A-17a
19b	View to the right of the report.
	
	Diagram A-17b

Continued on next page

Loop Qualification Process (continued)

Step	Action
20	Since MapViewer does not interface with SOE, the results must be manually entered into the remarks section of the service order.



TERMINAL ?? COUNT ??	1619 1206:210
LOOP MAKE UP INFORMATION DS0 or DS1	DS0
SERVED BY COPPER FACILITIES YES or NO	Yes
SERVED BY ELECTRONIC FACILITIES YES or NO	No
TYPE OF ELECTRONICS	None
LOOP LENGTH: Office to Electronics.	
19 GA COPPER ?? FEET 16 1 RESISTANCE PER Kf	0 0
22 GA COPPER ?? FEET 32.4 RESISTANCE PER Kf	0 0
24 GA COPPER ?? FEET 51 9 RESISTANCE PER Kf	7885 409.2315
26 GA COPPER ?? FEET 83 3 RESISTANCE PER Kf	129 10.7457
Sub-TOTAL LOOP FOOTAGE IS ?? Kf	8.01
LOOP LENGTH: Electronics\Office to End User	
19 GA COPPER ?? FEET 16 1 RESISTANCE PER Kf	0 0
22 GA COPPER ?? FEET 32 4 RESISTANCE PER Kf	0 0
24 GA COPPER ?? FEET 51 9 RESISTANCE PER Kf	4297 223.0143
26 GA COPPER ?? FEET 83 3 RESISTANCE PER Kf	0 0
Sub-TOTAL LOOP FOOTAGE IS ?? Kf	4.30
TOTAL LOOP FOOTAGE IS ?? Kf	12.31
TOTAL RESISTANCE FOR LOOP IS ?? OHMS	642.9915
BRIDGE TAPS:	
1st AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	3195 20
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
2nd AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	3195 20
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
3rd AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	0 0
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
4th AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	0 0
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
5th AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	0 0
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
6th AT ?? FEET - LENGTH ?? FEET COST ?? OPT\REQ	0 0
ADDL PAIRS SAME LOCATION COST ?? OPT\REQ	
ENGINEERING CHARGE ??	$0.00
TRIP CHARGE ??	$0.00
DISTURBERS PRESENT\NONE INDICATED	None Indicated
LOAD COILS PRESENT ON CABLE PAIR YES or NO	No
COST TO REMOVE LOADS ON NON-STANDARD LOOP ??	$0.00
COST TO REMOVE LOADS FOR ADDL PAIRS ??	$0.00
COST FOR REPEATER REMOVAL ??	$0.00
COST TO REMOVE REPEATERS FOR ADDL PAIRS ??	$0.00
COST FOR REQUIRED CONDITIONING IS	$0.00
COST FOR OPTIONAL CONDITIONING IS	$0.00
TOTAL DB LOSS	0.00
TYPE LOOP. TRADITIONAL REPEATER\HDSL TECHNOLOGY	Not Applicable
ICB NEEDED FOR SPECIAL CONSTRUCTION	None

Diagram A-18

Continued on next page

Loop Qualification Process (continued)

Step	Action
20	The *Field Team Engineer* then obtains the electrical parameter information by executing the subscriber line test via AccessCare. The customer's telephone number is entered in the "Test" field. AccessCare will populate the CLLI code and Cable/Pair number based on information pulled from NIDA.

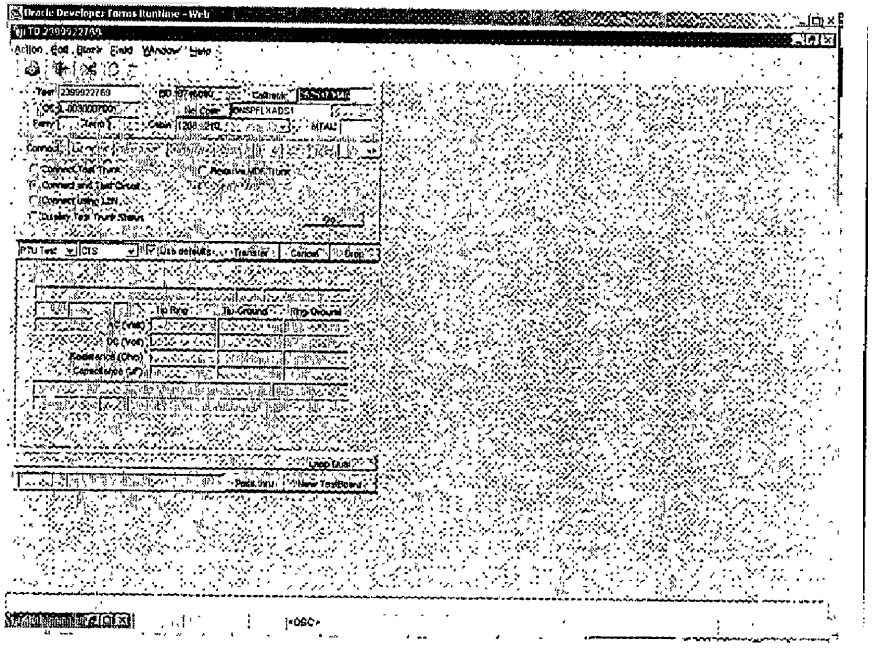


Diagram A-19

Continued on next page

Loop Qualification Process (continued)

Step	Action
21	Test results are populated.

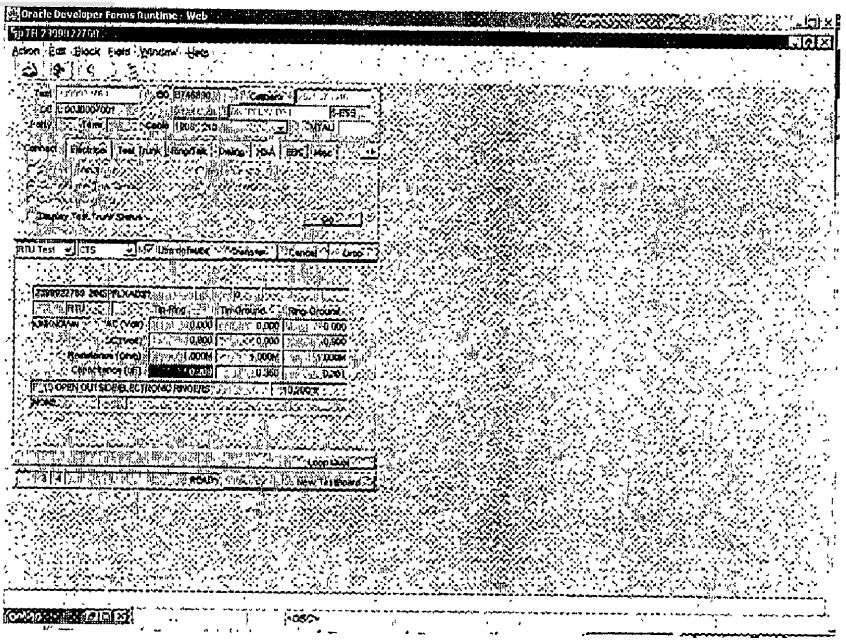


Diagram A-20

22	Since AccessCare does not interface with SOE, the results must be manually entered into the remarks section of the service order.

Work sheet for Electrical Parameters

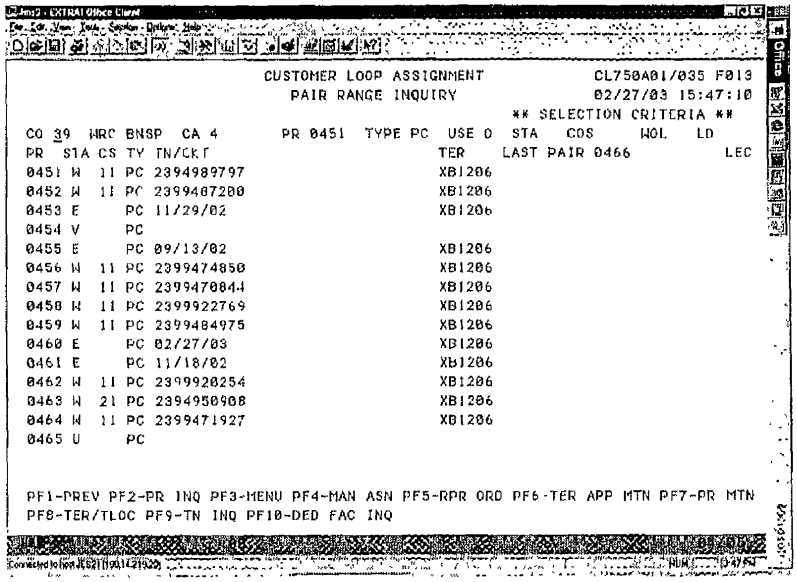
ELECTRICAL PARAMETERS	TIP RING	TIP GRD	RING GRD
AC(VOLTS)	*0.000	*0.000	*0.000
DC(VOLTS)	*9.000	*0.000	*-9.000
RESISTANCE(OHMS)	*1.000	*1.000	*1.000
CAPACITANCE(UF)	*0.209	*0.350	*0.351

Diagram A-21

Continued on next page

Loop Qualification Process (continued)

Step	Action
23	The Field Team Engineer then reviews CLAS and EWO records for potential T-1 disturbers. The following CLAS screen is used to identify any T-1 circuits (Class of Service = 99) in a particular binder group. If a T-1 circuit was located, the Field Team Engineer would research EWO to determine if it was located in the same or adjacent binder group.



```
                                CUSTOMER LOOP ASSIGNMENT          CL750A01/035 F013
                                  PAIR RANGE INQUIRY              02/27/03 15:47:10
                                                                ** SELECTION CRITERIA **
CO 39  WRC BNSP  CA 4       PR 0451  TYPE PC  USE D  STA   COS      WOL   LD
PR   STA CS TY TN/CKT                             TER    LAST PAIR 0466          LEC
0451 W  11 PC 2394989797                          XB1206
0452 W  11 PC 2399487200                          XB1206
0453 E     PC 11/29/02                            XB1206
0454 V     PC
0455 E     PC 09/13/02                            XB1206
0456 W  11 PC 2399474850                          XB1206
0457 W  11 PC 2399470844                          XB1206
0458 W  11 PC 2399922769                          XB1206
0459 W  11 PC 2399484975                          XB1206
0460 E     PC 02/27/03                            XB1206
0461 E     PC 11/18/02                            XB1206
0462 W  11 PC 2399920254                          XB1206
0463 W  21 PC 2394950908                          XB1206
0464 W  11 PC 2399471927                          XB1206
0465 U     PC


PF1-PREV PF2-PR INQ PF3-MENU PF4-MAN ASN PF5-RPR ORD PF6-TER APP MTN PF7-PR MTN
PF8-TER/TLOC PF9-TN INQ PF10-DED FAC INQ
```

Diagram A-22

Continued on next page

Loop Qualification Process (continued)

Step	Action
24	Once all of the required loop qualification data has been populated, the Field Team Engineer closes the service order and the results are routed to IRES. The CLEC can view the results by selecting the LSR Confirm screen and requesting "Print Preview".

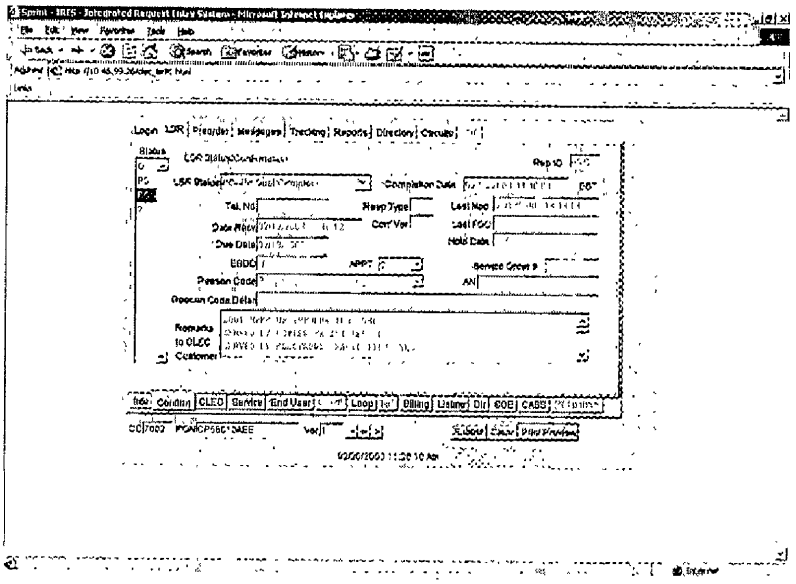


Diagram A-23

Attachment B

Retail Data Services

Overview

This document will describe the retail loop qualification process for DSL (Digital Subscriber Line) services.

Qualification of High Speed Data Product Requests

There are two ways that a customer can be qualified for HSD services:

- Customers may access the Sprint.com internet website to check their qualification status, or
- Customers may contact a Sprint Sales Agent.

Sprint.com Website

Customers may determine qualification by accessing the sprint.com internet website. The customer enters their telephone number into the Pricing and Availability page to check for availability.

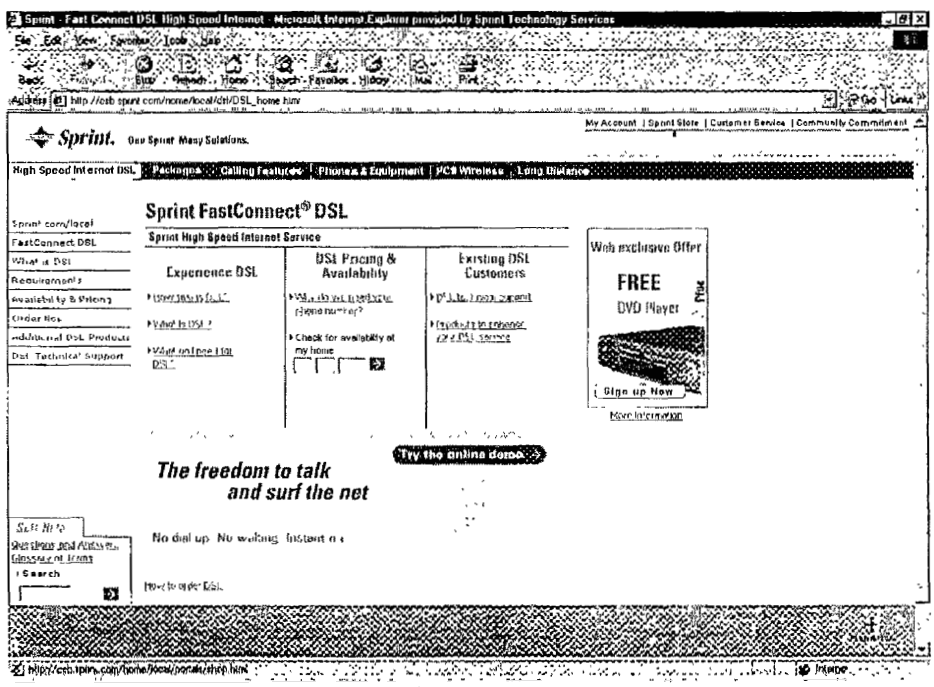


Diagram B-1

Continued on next page

Qualified Results

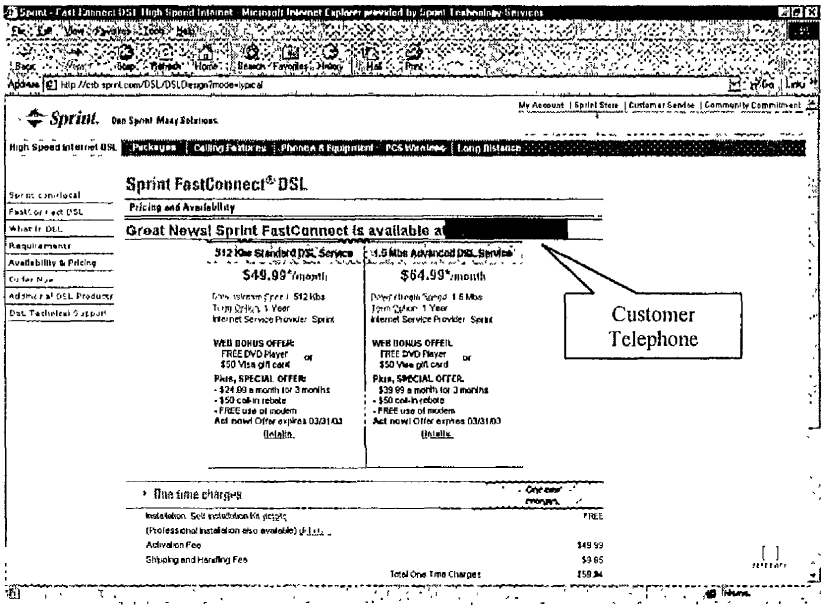


Diagram B-2

Not Qualified Results

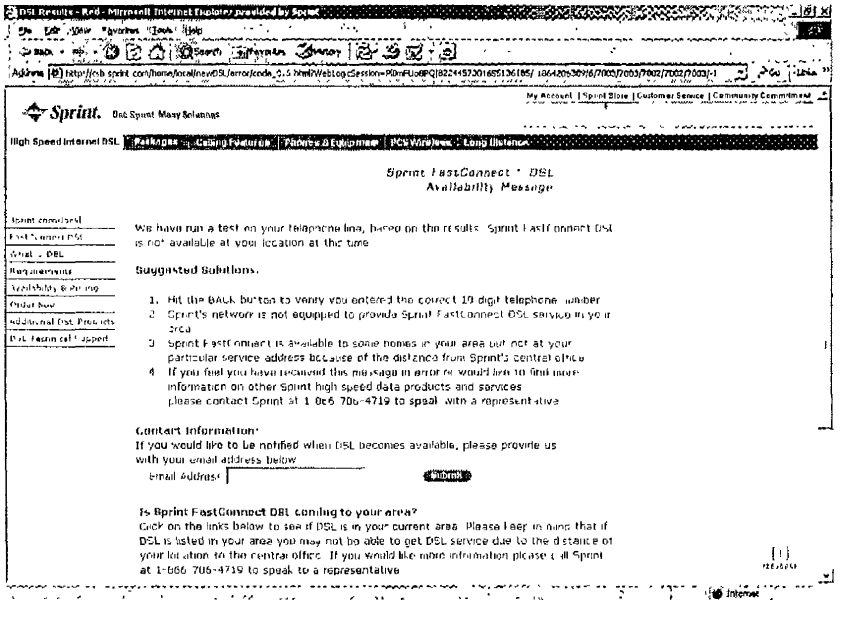


Diagram B-3

Continued on next page

Retail Data Services, Continued

Sales Agents	Once an order is received either from the Sprint website or from a call to the business office, Sales Agents can obtain a MEDR or AIDR value by inputting a working telephone number or a service address for a prospective HSD customer. (NOTE: This information is also available to ALECs free of charge.)
Loop Qualification Requests	All requested high-speed data, loop qualifications are presented to the responsible *Field Team Engineer* to complete a loop makeup. The steps for loop makeup used for retail services are identical to the steps outlined in Attachment A Wholesale Data Services on pages A-1 through A-17 for physical loop attributes, pages A-19 and A-20 for electrical parameters, and page A-21 for disturber information. (NOTE: Some pages that are excluded refer to IRES process steps that are only applicable to ALEC loop qualification requests.)

Attachment C

Cost Analysis

Overall Cost

To automate the physical loop attributes will cost approximately $520,150.

- IRES Enhancements - $227,650
- EWO Enhancements - $227,500
- Electrical Parameters - $ 65,000

Implementation Timeframe

With the 2003 budget already finalized and funding identified for existing projects, the Electronic Loop Qualification project would be targeted for 2004. To be able to implement prior to 2004 would require reprioritization of the already-funded 2003 projects. Once funding was obtained, the project could be implemented in approximately nine months.

- IRES – Programming would require eight months from the approval of the project, with an additional month for implementation.
- EWO – With the assistance of Byers' Engineering, programming and implementation would require less than 9 months.
- Access Care – Programming for front end would require less than 9 months.

Analysis

The Sprint nation-wide demand for LMU has averaged 4,105 per year and Florida has averaged 900 per year, or 22% of the national total. With the total enhancement cost of $520,150 levelized over three years, the cost of automating the physical loop attributes and electrical parameter access would be $55.47 (see C-3, line 39) nation-wide. These estimates do not include disturber information. The cost of this additional function, from Sprint's UNE cost filing is:

- Presence of Disturbers – Field Team Engineer 5 minutes per request - $3.47 (see C-4, line 7).

Disturber costs of $3.47 combined with the $55.47 for the automated physical loop attributes and electrical parameter front end the total cost per request would be $58.94.

Continued on next page

Cost Analysis, Continued

Summary

Due to the current low demand for LMU, the high cost to automate, the inability to automate disturbers and the recent FCC Triennial ruling on line sharing Sprint believes that further enhancements to LMU would not be a prudent business decision. If however Sprint develops further automation ALECs would be given equal access.

Continued on next page

Cost Analysis, Continued

Levelizer Costing Model

Levelizer Costing Model (copyright © 1995)

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SPRINT-LTD LEVELIZING PROGRAM RELEASE 4 (1/98)

Sprint / Regulatory Affairs / Costing Support

1	Company Name	**Sprint**			
2	Study Name.	**Electronic Loop Qual Charge Study**			
3	Study Date	**June 24, 2002**	After Tax	After Tax	
4	Income Tax Rate	**38.58%**	Capital Cost	Wtd Cost	
5	Debt Cost	**7.81%**	4 80%	0 77%	
6	Debt Percent/Ratio	**15.98%**			
7	Equity Cost	**11.49%**	11 49%	9 65%	
8	Equity Percent/Ratio	84 02%			
9	Capital Cost	10 90%		10 42%	Total Capital Cost
10	Ad Valorem Tax Rev Factor	**0.72%**			
11	Maintenance Factor	**0.00%**			
12	Salvage	**0.00%**			
13	Study Life (yrs)	**3.00**			
14	Revenues Accounted **Mid-year=1** or Year End=2	**1**			

				Year 1	Year 2	Year 3
15	Demand Units-**Year End**			**4,105**	**4,105**	**4,105**
16	Demand Units - **Mid-Year**			4,105	4,105	4,105
17a	Investment-MACRS Class of Plant (yrs)	3		**$0**	$0	$0
17b	Investment-MACRS Class of Plant (yrs)	5	$	**520,150**	$0	$0
17c	Investment-MACRS Class of Plant (yrs)	7		**$0**	$0	$0
17d	Investment-MACRS Class of Plant (yrs)	10	$	-	$0	$0
17e	Investment-MACRS Class of Plant (yrs)	15		**$0**	$0	$0
17f	Investment-MACRS Class of Plant (yrs)	20		**$0**	$0	$0
17g	Period Beginning Expense (Software)			**$0**	$0	$0
18	Residual Benefit(+)/Cost(-)(Salv/COR)			$0	$0	$0
19	Cumulative Investment			$520,150	$520,150	$520,150
20	Principle Repayment (rate purposes)			$173,383	$173,383	$173,383
21	Cumulative Principle Repayment			$173,383	$346,767	$520,150
22	Value to Recover (unrecovered principle)			$520,150	$346,767	$173,383
23	Debt and Equity Cost			$8,810	$27,795	$48,759
24	Ad Valorem Tax			$3,745	$2,497	$1,248
25				**$0**	$0	$0
26	Maintenance Expense			**$0**	**$0**	**$0**
27	Other Expense		$	-	$0	$0
28	Income Tax			$46,274	$22,675	$48,843
29	Revenue Requirement			$232,213	$226,350	$272,234
30	Discount Rate @ 10 42%			0 95165	0 86184	0 78051
31	Present Value of Rev Req			$220,984	$195,077	$212,480
32	Cumulative PV Rev Req			$220,984	$416,062	$628,542
33	NPV Dollars last Yr			$590,701	$590,701	$590,701
34	Demand (Mid-Year) Units			4,105	4,105	4,105
35	Discount Rate @ 10 42%			0 95165	0 86184	0 78051
36	Present Value of Demand			3,907	3,538	3,204
37	Cumulative PV Demand			3,907	7,444	10,648
38	NPV Units in Service			10648	10648	10648
39	**Levelized Rev. Req./Year**			**$55.47**	**$55.47**	**$55.47**
40	Revenue Generated			$227,719	$227,719	$227,719
41	Discount Rate @ 10 42%			0 9516	0 8618	0 7805
42	PV Revenue by Year			$216,708	$196,257	$177,736
43	Monthly Revenue Requirement (Floor Cost)			$4 62	$4.62	$4.62
43a	Annual Charge Factor			5 5%	5 5%	5 5%

CASH FLOW STUDY OF OPPORTUNITY

44	Revenues From Project			$227,719	$227,719	$227,719
45	Non Capital Related Expense			$3,745	$2,497	$1,248
46	Debt & Equity Exp (captured within the disc rate)			N/A	N/A	N/A
47	Depreciation (Tax Purposes)			$104,030	$166,448	$99,869
48	Net Income before Tax			$119,944	$58,774	$126,602
49	Income Tax (includes residual depr)	-46274445 82		($46,274)	($22,675)	($48,843)

Continued on next page

Cost Analysis, Continued

Cost Support

Loop Qualification Information Request Process - Field Team

	(A)	(B)	(C)	(D)	(E) (C)/60*(D)	(F)	(G) (E)*(F)
Line #	Step Description	Position Title	Time Estimate (Minutes)	Probability	Weighted Time Estimate (Hours)	Loaded Labor Rate	FL Cost
1	Order is pulled from the printer.	Facility Coordinator	1	100.00%	0.0167	$ 41.59	$ 0.69
2							
3	Terminal is researched. Mapviewer is accessed. Cable IPID is identified for the loop Loop makeup is accessed in Mapviewer and loop makeup is run. Loop makeup information is added to the	Facility Coordinator and Engineer	23	100.00%	0.3833	$ 41.59	$ 15.94
4							
5	Electrical Parameters are researched and added to the remark section of the	Facility Coordinator	5	100.00%	0.0833	$ 41.59	$ 3.47
6							
7	Disturber data researched and added to the remark section of the service order	Engineer	5	100.00%	0.0833	$ 41.59	$ 3.47
8							
9	The service order is closed	Facility Coordinator	1	100.00%	0.0167	$ 41.59	$ 0.69
10							
11			35				
12							
13	Total						$ 24.26

Sprint-Florida, Incorporated.
Docket No. 990649-TP
Composite Exhibit 2
Volume II
Section IX – NRC
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