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March 10, 2003

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

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COMMISSION
CLERK

Re: Docket No. 010795-TP Sprint Communications Company Limited Partnership's
Opposition to Verizon Florida, Inc.'s Motion for Approval of Interconnection
Agreement

Dear Ms. Bayó:

Enclosed for file is the original and 15 copies of Sprint Communications Company
Limited Partnership's Opposition to Verizon Florida, Inc.'s Motion for Approval of
Interconnection Agreement.

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.

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Sincerely,

Susan S. Masterton

Enclosure

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 010795-TP**

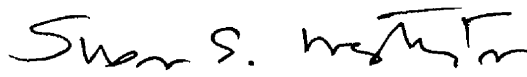
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail, Hand Delivery*, or Overnight Mail**, this 10th day of March, 2003 to the following:

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106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704



Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint Communications) Docket No. 010795-TP
Company Limited Partnership for)
Arbitration with Verizon Florida, Inc. f/k/a)
GTE Florida Incorporated, Pursuant to) Filed: March 10, 2003
Section 252(b) of the Telecommunications)
Act of 1996.)
_____)

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S
OPPOSITION TO VERIZON FLORIDA, INC.'S MOTION FOR APPROVAL OF
INTERCONNECTION AGREEMENT**

Sprint Communications Company Limited Partnership ("Sprint") respectfully requests that the Commission deny the Motion of Verizon Florida, Inc. ("Verizon") to adopt Verizon's proposed contract language for the filed conforming agreement as set forth in the Verizon Motion filed February 28, 2003 ("Verizon Motion"). The Parties have filed comments with respect to three issues: 1) the definition of local traffic; 2) the proper use by Sprint of multi-jurisdictional trunks and 3) the applicability of Verizon's UNE prices. Sprint will limit its comments in this filing to the first two issues. With respect to both issues, Verizon attempts to resolve only part of the issues that were defined for arbitration.

1) Definition of Local Traffic

Verizon attempts to limit the applicability of the local traffic definition to VAD/00- traffic, which is "originated by a Subscriber of one Party on that Party's network and terminated to a Subscriber of the other Party on that other Party's network." This definition does not comport with the Commission's *Final Order on Petition for*

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Arbitration, Order No. PSC-03-0048-FOF-TP (“*Final Order*”) in this proceeding and does not address the practical realities of the way local traffic may be routed.

In the *Final Order* the Commission clearly provided as follows¹:

For the purposes of the new Sprint/Verizon interconnection agreement, we find that the jurisdiction of calls dialed via 00- or 7/10D should be defined based upon the end points of a call. Thus, calls dialed in this manner, which originate and terminate in the same local calling area, should be defined as local traffic.

This is unambiguous language that fully supports Sprint’s proposed language. In addition, assuming a call originated on the Verizon network and terminated to a customer that was in the same local calling area but served by a CLEC, Verizon’s language would preclude that call from being completed. It is unclear from Verizon’s proposed language what would happen to these calls or how Sprint would be charged. Presumably Verizon would simply assess access charges for these calls. Sprint does not believe this is the intent of the Commission’s decision in the *Final Order*.

Contrary to Verizon’s assertion, Sprint’s definition of local traffic also takes into account the FCC’s regulations on the types of traffic that are appropriate for consideration under the Act. Sprint’s language specifically provides for the exclusion of “traffic that is interstate or intrastate Exchange Access, Information Access, or exchange services for such access as determined by the FCC in the Order on Remand and Report and Order, CC Docket Nos. 96-98, 99-68 adopted April 18, 2001, FCC 01-131 (“Order”), as that Order is subsequently modified by action of the FCC or a court of competent jurisdiction (See paragraphs 34, 36, 39, 42-43).” Sprint’s proposed language appropriately incorporates the decisions of this Commission and the FCC. Verizon’s language does not.

II. Multi-jurisdictional Trunks.

Sprint and Verizon also disagree over the interpretation of the *Final Order* with respect to Sprint's use of multi-jurisdictional trunks. In the *Final Order*, the Commission did not limit the concept of multi-jurisdictional trunks to VAD/00- traffic as Verizon suggests. Although VAD/00- was a significant element in the discussions, the scope of the issue the Commission was asked to resolve was not so narrowly defined.

Moreover, Verizon's proposed language with respect to the separate Attachment C to the Interconnection Attachment for compensation for VAD/00- traffic is simply incorrect and does not reflect the recommendation made in this proceeding. Sprint's proposed language correctly reflects the Commission's *Final Order* and contains modifications that were made to comport the treatment of multi-jurisdictional trunks to Sprint's recommendation, adopted by the Commission, by removing charges for originating end office switching and originating tandem switching.

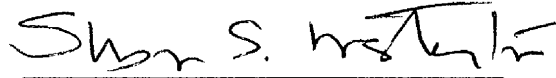
In addition, Verizon's proposed language, by definition, limits the applicability of the VAD/00- provisions to traffic that originates and terminates on the Verizon network. From a practical perspective this eliminates the benefit of having the VAD/00- provisions approved if such traffic cannot be completed to other carriers, such as CLECs in the same local calling area. Again it is unclear from Verizon's proposed language what would happen to these calls or how Sprint would be charged. Presumably Verizon would simply assess access charges for these calls. Again, Sprint does not believe this is the intent of the Commission's decision in the *Final Order*.

Finally, Sprint's proposed language correctly incorporates the substance of the *Final Order* by providing a restriction that the provisions are effective only after the billing issues have

¹ *Final Order*, page 12.

been resolved. Sprint's language is designed to give the full benefit of the Commission's *Final Order* to Sprint, while Verizon's language applies the *Final Order* so narrowly that it is rendered a nullity. Therefore, the Commission should approve the language proposed by Sprint and order the parties to execute an Interconnection Agreement containing Sprint's language.

Respectfully submitted this 10th day of March 2003.



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