

ORIGINAL



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

September 3, 2003

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

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03 SEP - 3 PM 3:18
COMMISSION
CLERK

RE: Docket No. 030868-TL

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and 15 copy of the Notice of Service of Citizens first set of interrogatories (Nos. 1-26) and first set of production of documents (Nos. 1-24) to Florida Power Corporation.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office

Sincerely,

H.F. Rick Mann
Associate Public Counsel

HFM/pwd
Enclosures

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC 1
- OTH _____

1st set of Int. (1-26)
DOCUMENT NUMBER-DATE

08198 SEP-3 8

FPSC-COMMISSION CLERK

1st set POD (1-24)
DOCUMENT NUMBER-DATE

08199 SEP-3 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Sprint-Florida, Incorporated,)
To reduce intrastate switched network)
Access rates to interstate parity in)
Revenue neutral manner pursuant to)
Section 364.164(1), Florida Statutes)

Docket no. 030868-TL

Filed September 3, 2003

CITIZENS' FIRST SET OF INTERROGATORIES TO SPRINT- FLORIDA, INC

Pursuant to § 350.0611(1), Fla. Stat. (2002), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.340, Florida's Citizens ("Citizens"), by and through Jack Shreve, Public Counsel, propound the following interrogatories to Sprint Florida, Inc. ("Sprint Florida") to be answered on or before Thursday, September 18, 2003.

INSTRUCTIONS

1. Each interrogatory should be answered based upon your knowledge and information or belief, and any answer based upon information and belief should state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which an answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses.

2. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

DEFINITIONS

1. The terms "Sprint," "Sprint Florida" "you," "your," and the "company" encompass Sprint Florida together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of Sprint Florida.

INTERROGATORIES

1. Provide Sprint PCS's intrastate access rates and associated terms and conditions for each wireless carrier and interexchange carrier with which SprintPCS interconnects within the state of Florida.

2. Identify any studies made by Sprint, for Florida or any other Sprint jurisdiction, that quantifies the cost of basic residential telephone service based on the assumption that all basic services, vertical services and access services share the cost of the loop. If so, please state the date and the name of the cost study.

3. State whether Sprint has developed or produced cost studies for bundled services since January 1, 2000, where the basic residential local exchange service component was bundled with additional products and services and provided at a single reduced rate. If so, please state the date and identify the name of the cost study.

4. Referring to the testimony of witness Dickerson, explain how Sprint calculates the costs of SS7 in its costing of basic local exchange residential service as shown in KWD-1.

5. Explain how Sprint calculates the costs of SS7 signaling costs required for vertical services.

6. Explain how Sprint calculates the costs of SS7 signaling costs required by CLECs in its UNE pricing.

7. Please state the depreciation rate used by Sprint in the calculation of its, aerial, underground and buried metallic facility costs.

8. Please state the annual rate of growth for primary basic residential service access lines for each of the past five years starting with December 31, 1998 and ending with December 31, 2002.

9. Please state the annual rate of growth in intrastate access line revenues for each of the past five years starting with December 31, 1999 and ending with December 31, 2002.

10. Referring to the testimony of witness Gordon, please state the weighted average rate for residential service for Sprint as compared to the unweighted average as shown in Table 1, page 10.

11. Please state whether Sprint has developed cost studies for bundled services since January 1, 2000, where the basic residential local exchange service component was bundled with additional products and services and provided at a single reduced rate. If so, please state the date and identify the name of the cost study.

12. Please provide the docket numbers and titles for all telecommunications testimony that witness Gordon states that he has delivered in the unnamed attachment to his testimony.

13. Please state the basis for the statement by witness Gordon on Page 21, line 3 that intrastate access services are priced significantly above their forward-looking costs and identify all prior dockets where witness Gordon has testified as to this issue.

14. Referring to the testimony of witness Staihr, page 7, excluding prepaid local exchange companies, sometimes referred to as "Phone Sharks", what percentage of residential lines have been lost to CLECs to date.

15. Referring to the testimony of witness Staihr, page 8, lines 1-4, is it Sprint's position that penetration rates in Florida have declined as a result of "cutting the cord"? If so, please state the percentage amount of penetration that has been lost to this phenomena in the residential market in Florida.

16. Referring to the testimony of witness Felz, page 9, lines 3-4, where he states that the current rate of intrastate switched access is currently \$.050392 per minute of use (per end) and the current cost is \$.004475, please state the intrastate switched access cost per minute of use (per end) that the company submitted in Docket No. 12765--TL, Docket No. 8609874-TL, Docket No. 891239-TL and Docket No. 910980-TL.

17. Referring to BellSouth witness Hendrix testimony in this docket, please state the amount of Sprint revenue that would be produced by Sprint using the two different methodologies that were presented to the Commission by Mr. Hendrix.

18. Referring to the testimony of witness Felz, page 20, lines 14-22, please list all basic local telecommunications services that were not proposed for increases by the company, excluding Lifeline and pay telephone services.

19. Referring to the testimony of witness Felz, page 26, lines 3-10, please state whether Sprint has calculated any price elasticity or repression analysis based on the increases proposed in this docket and the title and dates of such studies, and the amount of repression for residence and business services stated separately.

20. Please state the company names and states where Sprint has affiliates that provide competitive local exchange services.

21. Please state the originating and terminating switched access rates that are charged by each of Sprint's affiliated CLECs.

22. Referring to the testimony of witness Staihr, page 12, lines 18-23, please provide the comparable percentage of CLEC entry in the three states served by Sprint that have the highest rates.

23. Please state the basic residential rates that are charged in the three states served by Sprint that have the highest rates.

24. If basic local rates are supported by access charges, explain if this means that any bundled service that includes basic local service as a component is also being supported. Explain why or why not. Provide calculations and other information to show

that each of the bundled services which include basic local service are not being supported by access charges or other services.

25. The company asserts in various testimony that higher residential basic local rates will result in increased/improved competition by removing support. If this is the case, explain when and how the company plans to compete for basic residential customers in the Florida exchanges of other bell operating companies and other rural LECs. Explain why the company has no plan for competing with other carriers in Florida.

26. The company's testimony appears to assert that access provides greater support to residential basic local rates, versus business basic local rates (and some business rates may already be priced high enough that they don't receive any support from access). If basic business rates are already high enough in some exchanges (where there is no support) of other Florida bell operating companies and other rural LECs, explain why the company does not compete for basic business customers in these areas. Explain when and how the company plans to compete for these basic business customers in exchanges of other LECs. Explain why the company has no plan for competing with other carriers in Florida if this is so.

Respectfully Submitted,

CHARLES J. BECK
Interim Public Counsel
Florida Bar # 217821



H F. Rick Mann
Associate Public Counsel
Florida Bar No. 763225

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

(850) 488-9330

Attorney for Florida's Citizens

DOCKET NO. 030868-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 3rd day of September, 2003.

H F. Mann

Beth Keating, Esquire
Division of Legal Services
Fla. Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

John P. Fons, Esquire
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Tracy Hatch/Chris McDonald
AT&T Communications
101 North Monroe, Suite 700
Tallahassee, FL 32301

Michael A. Gross, Esquire
Florida Cable Telecomm. Assn.
246 East 6th Avenue
Tallahassee, FL 32303

Donna McNulty
MCI WorldCom, Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960

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

Susan Masterton, Esquire
Sprint-Florida, Incorporated
P.O. Box 2214
Tallahassee, FL 32316

Charles Rehwinkel, Esquire
Sprint-Florida, Incorporated
1313 Blair Stone Road
FLTH00107
Tallahassee, FL 32301