

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
Tallahassee, FL 32318-2214
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

October 6, 2003

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

RECEIVED-FPSC
03 OCT - 6 PM 4: 35
COMMISSION
CLERK

Re: Docket No. 981837-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint's Prehearing Statement.

Copies are being served on the parties in this docket via Electronic and US mail.

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.

Sincerely,

Susan S. Masterton

Enclosure

- AUS _____
- CAF _____
- CMP _____
- COM 5
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC 1
- OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09671 OCT-6 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Electronic and U.S. mail this 6th day of October, 2003 to the following:

Adam Teitzman, Esq.
Jason Rojas, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Phillip Carver
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Florida Cable Telecommunications
Association, Incorporated
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

McWhirter Law Firm
Vicki Kaufman/Joseph McGlothlin
117 S. Gadsden Street
Tallahassee, Florida 32301

Messer Law Firm
Floyd Self/Norman Horton
Post Office Box 1876
Tallahassee, Florida 32302

AT&T Communications of the
Southern States, Inc.
Tracy W. Hatch
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

AT&T Communications of the Southern
States, Inc. (GA)
Virginia C. Tate
1200 Peachtree St., N.E., Suite 8100
Atlanta, GA 30309

Supra Telecommunications &
Information Systems, Inc.
Mark E. Buechele
2620 S.W. 27th Avenue
Miami, FL 33133

Verizon-Florida, Incorporated
Richard Chapkis c/o David Christian
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704

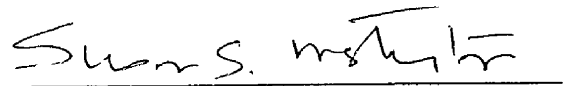
Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Ave., Suite 2000
Orlando, FL 32801

Covad Communications Company
Mr. Charles E. Watkins
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309-3574

Shook, Hardy & Bacon, LLP
Rodney L. Joyce
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004

Wilmer Law Firm
C. Ronis/D. McCuaig/J. Frankel
2445 M Street, N.W
Washington, DC 20037-1420

Beth Keating, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870



Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for
Commission action to support local
competition in BellSouth
Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation to
provide alternative local exchange carriers
with flexible, timely, and cost-efficient
physical collocation.

DOCKET NO. 990321-TP

Filed: October 6, 2003

SPRINT'S PREHEARING STATEMENT

Pursuant to the Orders Establishing Procedure, Order No. PSC-02-1513-PCO-TP, Order No. PSC-03-0288-PCO-TP and Order No. PSC-03-0776-PCO-TP, Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership (collectively "Sprint") file this Prehearing Statement.

A. WITNESSES: Sprint proposes to call the following witnesses to offer testimony in this docket:

<u>Witness</u>	<u>Issues</u>
Edward Fox (Direct only)	10
Randy G. Farrar (Rebuttal only)	9A & 9B
Jimmy R. Davis (Direct and Rebuttal)	9A, 9B & 10

DOCUMENT NUMBER-DATE

09671 OCT-6 8

FPSC-COMMISSION CLERK

Sprint has listed the witnesses for whom Sprint believes testimony will be filed, but reserves the right to supplement that list if necessary.

B. EXHIBITS:

Edward Fox	EBF-2	Collocation Attachment
Randy G. Farrar	RGF-1 RGF-2	Sprint Input Worksheet Sprint's Commission Approved Cost Factors
Jimmy R. Davis	Revised JRD-2 JRD-3 JRD-4 JRD-5 JRD-6 (Proprietary) JRD-7 JRD-8 JRD-9 JRD-10	Collocation Cost Study Sprint Collo 1 Density and Economies of Scale Statistics Amperage Utilization Abandoned and Decommissioned CLEC Collocations Building Investment per square foot Security Installation Bids Floor Space Factor Florida Ground Bar Cost Summary

Sprint has listed the exhibits Sprint believes will be introduced, but reserves the right to introduce additional exhibits at the hearing or other appropriate points.

C. BASIC POSITION: The Commission should reject AT&T's suggestion to adopt a single cost model and a single set of inputs for BellSouth, Verizon and Sprint. Differences in scale and scope, as well as operational differences, result in different costs and different cost structures for the collocation offerings of each of the ILECs. Forcing Sprint to arbitrarily use another company's cost model and rate structure in Florida will create costly inefficiencies for both Sprint and CLECs alike. Sprint's cost studies and its prices derived from these cost studies comply with TELRIC and the Act and should be adopted by the Commission.

D-F. ISSUES AND POSITIONS:

ISSUE 9A: For which collocation elements should rates be set for each ILEC?

Position: Rates should be set for the collocation elements identified in Sprint's cost study. These rate elements are based on examinations of actual collocation arrangements in Sprint central office buildings, as well as FCC and FPSC requirements.

ISSUE 9B: For those collocation elements for which rates should be set, what is the proper rate and the appropriate application of those rates?

- **Position:** The rates should be the recurring and nonrecurring charges submitted by Sprint in its cost study and associated testimony. Sprint's cost study complies with TELRIC principles in that it is forward looking with no inclusion of embedded costs. Nonrecurring charges (NRCs) were determined by applying common cost to the sum of labor, materials, sales tax and freight. Some collocation elements charged as NRCs have an accompanying monthly recurring charge (MRC) to cover the ongoing cost of maintenance and other applicable carrying charges. Rates for elements recovered strictly through MRCs were determined by applying the appropriate annual charge factor (ACF) to the sum of labor, materials, sales tax and freight to determine the annual cost for the investment. The common cost factor was applied to the annual cost to determine the total MRC.

ISSUE 10: What are the appropriate definitions, and associated terms and conditions for the collocation elements to be determined by the Commission?

Position: The definitions applicable to collocation elements should be those recommended by Sprint in its cost studies and associated testimony. The terms and conditions for collocation should be as set forth in the applicable interconnection agreement.

G. STIPULATIONS: None.

H. PENDING MOTIONS:

Sprint's Motion Accept Late-filed Discovery Responses, filed 8-18-03

AT&T's Motion to Compel discovery to Sprint, filed 9-15-03

Sprint's Motion for Extension of Time to Respond to AT&T's Motion to Compel, filed 10-02-03

I. PENDING CONFIDENTIALITY REQUESTS:

Sprint's Request for Confidential Classification for DN 07621-03, filed 9-15-03

Sprint's Request for Confidential Classification for DN 09287-03, filed 9-26-03

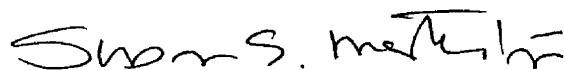
Sprint's Request for Confidential Classification for DN 09291-03, filed 9-26-03

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: Sprint does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

K. DECISIONS THAT MAY IMPACT COMMISSION'S RESOLUTION OF ISSUES:

Sprint is not aware of any decisions that impact the Commission's resolution of the issues at this time.

RESPECTFULLY SUBMITTED this 6th day of October 2003.



SUSAN S. MASTERTON

P.O. Box 2214

Tallahassee, FL 32316-2214

(850) 599-1560

Fax: (850) 878-0777

susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT