

ORIGINAL



Susan S Masterton
Attorney

Law/External Affairs
FLTLH00103
1313 Blair Stone Rd
Tallahassee, FL 32301
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

October 22, 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

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COMMISSION
CLERK

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and one copy of Sprint's
Comments on Proposed Issues.

Copies are being served on the parties in this docket via electronic and US mail 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 my assistant. 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 _____

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**CERTIFICATE OF SERVICE
DOCKET NO. 030851-TP & 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail on October 21, 2003, and by U.S. Mail on October 22, 2003 to the following:

AT&T
Tracy Hatch
101 North Monroe Street, Suite
700
Tallahassee, FL 32301-1549

AT&T Communications of the
Southern States, LLC
Ms. Lisa A. Sapper
1200 Peachtree Street, N.E., Ste.
8100
Atlanta, GA 30309-3579

BellSouth Telecommunications,
Inc.
R. D. Lackey/M. Mays/N.
White/J. Meza
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite
400
Tallahassee, FL 32301-1556

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

FDN Communications
Matthew Feil/Scott Kassman
390 North Orange Avenue, Suite
2000
Orlando, FL 32801-1640

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

ITC DeltaCom
Nanette Edwards
4092 South Memorial Parkway
Huntsville, AL 35802

KMC Telecom III, LLC
Marva Brown Johnson, Esq.
1755 North Brown Road
Lawrenceville, GA 30043-8119

McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, FL 32302-1876

Verizon Florida Inc.
Richard Chapkis
P.O. Box 110, FLTC0717
Tampa, FL 33601-0110

Florida Public Service
Commission
Adam Tietzman
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Allegiance Telecom of Florida, Inc.
Jeffrey J. Binder
1919 M Street, N.W.
Washington, DC 20037

Allegiance Telecom, Inc.
Terry Larkin
700 East Butterfield Road
Lombard, IL 60148

Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

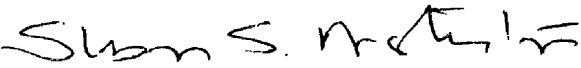
MCI WorldCom Communications, Inc.(GA)
De O'Roark, Esq.
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

Xspedius Communications
Ms. Rabinai E. Carson
5555 Winghaven Blvd., Suite 300
O'Fallon, MO 63366-3868
Phone: (301) 361-4220

Granite Telecommunications, LLC
Rand Currier/Geoff Cookman
234 Copeland Street
Quincy, MA 02169-4005

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

Miller Isar, Inc.
Andrew O. Isar
7901 Skansie Avenue, St. 240
Gig Harbor, WA 98335



Susan S. Masterton

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising) Docket No. 030851-TP
From Federal Communications Commission)
Triennial UNE review: Local Circuit Switching)
For Mass Market Customers)
_____)

SPRINT'S COMMENTS ON PROPOSED ISSUES

Pursuant to the Notice issued by the Florida Public Service Commission ("Commission") on October 17, 2003, Sprint-Florida, Incorporated and Sprint Communications Company Limited (collectively "Sprint") submit the following comments regarding Staff's Proposed Issues.

1. Sprint generally disagrees with staff's separation of the issues by ILEC service areas.
Pursuant to the Triennial Review Order (TRO) impairment is to be considered on a geographic market basis, to be defined by the Commission, not necessarily confined to markets based on each individual ILEC's service areas. (par. 495) Such markets may include the service area of only one ILEC, or may include the service area of more than one ILEC.
2. While Sprint believes that the TRO requires the issues to be addressed on a market by market basis, Sprint believes that the hot cut issues may be addressed on an ILEC-specific basis. The TRO recognizes that each ILEC has its own processes that must be considered in developing any applicable batch cut process. (par. 489)
3. Sprint suggests the following issues be added to the issues addressing self-provisioning in the relevant geographic market:

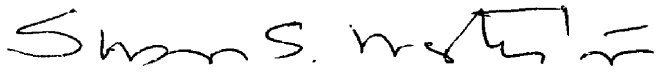
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- (a) In the market areas identified above is there evidence that the identified CLEC switches are currently serving, or capable of serving, only a portion of the market? If so, should the Commission re-define the market for purposes of conducting its analysis? What is the appropriate portion or percentage of customers being served, or capable of being served, by CLEC switches that would constitute a non-*de minimis* portion or percentage of the identified market?
- (b) In the market areas that are identified above is there evidence that some non-*de minimis* number of mass market customers are being served by the identified CLECs using their own switches? Is there evidence that the identified switches are capable of serving some non-*de minimis* portion of the mass market?
- (par. 501, footnote 1552)

Respectfully submitted,



Susan S. Masterton
1313 Blair Stone Road
P.O. Box 2214
Tallahassee, FL 32316-2214
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT