

ORIGINAL



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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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Re: Docket No. 030852-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

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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:

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Susan S. Masterton

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising) Docket No. 030852-TP
From Federal Communications Commission)
Triennial UNE review: Location Specific-Review)
For DS1, DS3 and Dark Fiber Loops and)
Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport)
_____)

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 the issues to be considered in this docket.

1. Sprint disagrees with staff's separation of the issues by ILEC service areas. Pursuant to the Triennial Review Order the relevant markets are not to be determined on an ILEC by ILEC basis (par. 116), but are to be considered on a customer location specific or transport route specific basis. (par. 328, par. 394) While customer locations will generally involve only one ILEC and transport routes may primarily involve only one ILEC, it is possible that routes may cross ILEC boundaries. Sprint believes that couching the issues in terms of customer locations or transport routes for which non-impairment may be claimed is sufficient and appropriate pursuant to the terms of the Order.

DOCUMENT NUMBER-DATE

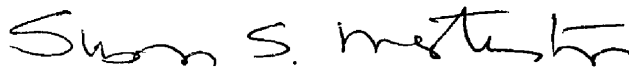
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2. Sprint generally supports the issue list proposed by the FCCA for this docket. However, Sprint would suggest the addition of the following issue relating to high capacity loop impairment:

Must a CLEC have access to an entire customer location (i.e. building) in order for "no impairment" to be found at that customer location? (par.332)

Respectfully submitted,



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