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October 31, 2003

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

> Re: Docket No. 000121B-TP, In re: Investigation into the establishment of operations support systems permanent measures for incumbent local exchange telecommunications companies (SPRINT-FLORIDA TRACK)

Dear Mrs. Bayo:

The undersigned carriers, AT&T Communications of the Southern States, LLC ("AT&T"), MCImetro Access Telecommunications Services, LLC ("MCI") and DIECA Communications, Inc. d/b/a Covad Communications Company ("CLEC Coalition") submit this letter in response to the Staff's Memorandum dated October 2, 2003, in this docket, soliciting comments for the Six Month Review of Sprint's Florida Performance Measurement Plan and Sprint's proposal to adopt in Florida the revisions to Sprint's Nevada Performance Measurement Plan as adopted by the Nevada Public Service Commission. Sprint filed proposed revisions to its performance measurement standards, based on those adopted by the Nevada Public Utilities Commission, and seeks their implementation in Florida on the same dates as planned in Nevada (February 20, 2004 for all revisions except the DS1 and DS3 disaggregation would be effective October 20, 2004).

The CLEC Coalition appreciates the opportunity to review the proposed changes and provide comments before the Staff recommendation on whether to implement the Nevada changes in its Florida performance measures. Our review of Sprint's proposed changes determined that we have some concerns about the revisions. In addition, we have some concerns about Sprint's current Florida Performance Measurement Plan. However, given the many

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regulatory issues before the Commission at this time, especially the Triennial Review Order cases, we submit that an extensive review of Sprint's performance measures at this time is not the best use of the parties' and Commission's limited resources. Without waiving its objections to the proposed revisions, the CLEC Coalition therefore requests that the Commission allow Sprint's proposed revisions to take effect as scheduled, subject to a more extensive consideration in the six-month review process. This would provide for a full review of the measures at a more appropriate time, without prejudicing any of the parties.

Thank you for your consideration of this request.

Sincerely,

Tracy Hatch

cc: Lisa Harvey Jerry Hallenstein David Rich

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## **CERTIFICATE OF SERVICE**

## **DOCKET NO. 000121B**

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

Mail this day 31th of October, 2003, to the following parties of record:

Covad Communications Company Mr. William H. Weber 19th Floor, Promenade II 1230 Peachtree Street, NE Altanta, GA 30309-3574 Phone: (404) 942-3494 Fax: (508) 300-7749 Email: <u>wweber@covad.com</u>

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Pennington Law Firm Peter Dunbar/Karen Camechis P.O. Box 10095 Tallahassee, FL 32302-2095 Phone: 850-222-3533 Fax: 222-2126 Email: <u>Pete@penningtonlawfirm.com</u> Sprint Communications Company Limited Partnership Susan Masterton/Charles Rehwinkel P.O. Box 2214 Tallahassee, FL 32316-2214 Phone: (850) 847-0244 Fax: 878-0777 Email: <u>susan.masterton@mail.sprint.com</u>

Time Warner Telecom of Florida, L.P. Carolyn Marek 233 Bramerton Court Franklin, TN 37069 Phone: (615)376-6404 Fax: (615)376-6405

Verizon Select Services Inc. Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 Phone: (813) 483-2617 Fax: (813) 223-4888

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<u>MCI WorldCom Communications, Inc.</u> Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131 Phone: (850) 422-1254 Fax: 422-2586 Email: donna.mcnulty@wcom.com

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