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November 21, 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

COMMISSION
CLERK

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Re: Docket No. 030867-TL, 030868-TL, 030869-TL, & 030961-TI

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint Communications Company, Limited Partnership are the original and 15 hard copies and 1 diskette of Sprint Communications Company, Limited Partnership's Initial Prehearing Statement.

Copies are being served on the parties in this docket via Electronic and U.S. 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 850/847-0244.

Sincerely,

Charles J. Rehwinkel / ssm

Charles J. Rehwinkel

Enclosure

- AUS _____
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CERTIFICATE OF SERVICE
DOCKET NO. 030867-TL, 030868-TL, 030869-TL, & 030961-TI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. Mail this 21st day of November to the following:

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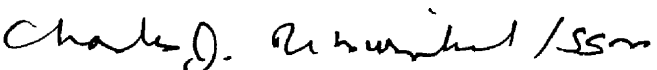
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Charles J. Rehwinkel
Charles J. Rehwinkel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: PETITION BY VERIZON FLORIDA, INC.
TO REFORM INTRASTATE NETWORK
ACCESS AND BASIC LOCAL
TELECOMMUNICATIONS RATES IN
ACCORDANCE WITH SECTION 364.164(1),
FLORIDA STATUTES

DOCKET NO. 030867-TL

IN RE: PETITION BY SPRINT-FLORIDA,
INCORPORATED TO REDUCE INTRASTATE
SWITCHED NETWORK ACCESS RATES TO
INTERSTATE PARITY IN A REVENUE
NEUTRAL MANNER PURSUANT TO
SECTION 364.164(1), FLORIDA STATUTES

DOCKET NO. 030868-TL

IN RE: PETITION FOR IMPLEMENTATION OF
SECTION 364.164(1), FLORIDA STATUTES, BY
REBALANCING RATES IN A REVENUE
NEUTRAL MANNER THROUGH DECREASES
IN INTRASTATE SWITCHED ACCESS CHARGES
WITH OFFSETTING RATE ADJUSTMENTS
FOR BASIC SERVICES, BY BELLSOUTH
TELECOMMUNICATIONS, INC.

DOCKET NO. 030869-TL

IN RE: FLOW-THROUGH OF LEC
SWITCHED ACCESS REDUCTIONS BY
IXCs, PURSUANT TO SECTION
364.163(2), FLORIDA STATUTES

DOCKET NO. 030961-TI

SPRINT COMMUNICATIONS COMPANY, LIMITED PARTNERSHIP'S
INITIAL PREHEARING STATEMENT

Sprint Communications Company, Limited Partnership ("Sprint LP" or "Sprint"), pursuant to Second Order Modifying Procedure, Order No. PSC-03-1269-PCO-TL, issued November 10, 2003, submits the following Initial Prehearing Statement:

A. **WITNESSES:** Sprint LP will sponsor the direct testimony of Emeric W. Kapka.

DOCUMENT NUMBER DATE

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B. EXHIBITS: Sprint LP will sponsor the following exhibit:

- Exhibits EWK - 1

C. BASIC POSITION: Sprint LP's basic position is that it will comply with the requirements of Section 364.163, Florida Statutes and flow through to business and residential customers the benefits of any ILEC access reductions approved by the Commission. Sprint's participation in Docket Nos. 030867-TL, 030868-TL and 030869-TL is conditional and depends on the ultimate outcome of the Motion identified in Section H of this Statement.

D-F. ISSUES AND POSITIONS:

Issue 1: Will the ILECs' rebalancing proposals remove the current support for basic local telecommunications services that prevents the creation of a more attractive competitive market for the benefit of residential consumers?

Position: No position at this time.

Issue 1A: What is a reasonable estimate of the level of support provided for basic local telecommunications services?

Position: No position at this time.

Issue 1B: Does the current level of support prevent the creation of a more attractive competitive local exchange market for the benefit of residential consumers?

Position: No position at this time.

Issue 1C: Will the ILECs' rebalancing proposals benefit residential consumers as contemplated by Section 364.164, Florida Statutes? If so, how?

Position: No position at this time.

Issue 2: Will the effects of the ILECs' rebalancing proposals induce enhanced market entry? If so, how?

Position: No position at this time.

Issue 3: Will the ILECs' rebalancing proposals reduce intrastate switched network access rates to interstate parity over a period of not less than two years or more than four years?

Position: No position at this time.

Issue 4: Are the ILECs' rebalancing proposals revenue neutral, as defined in Section 364.164(2), Florida Statutes?

Position: No position at this time.

Issue 5: Should the ILECs' rebalancing proposals be granted or denied?

Position: The ILECs' Petitions should be granted.

Issue 6: Which IXCs should be required to file tariffs to flow through BellSouth's, Verizon's, and Sprint-Florida's switched access reductions, if approved, and what should be included in these tariff filings?

Position: Sprint's conditional position (please see Joint Motion for Reconsideration or Clarification) is that any IXC paying more than \$1 million in access charges should be required to demonstrate that the required flow-through has occurred. It is not clear that the demonstration of flow through should occur in the tariff filings. The demonstration of compliance with the statutory requirements should be up to each company and should insure that confidentiality is maintained where needed. Tariffs should reflect rates and charges that flow through benefits of reduced access charge prices.

Issue 7: If the ILEC access rate reductions are approved, should the IXCs be required to flow through the benefits of such reductions, via the tariffs, simultaneously with the approved ILEC access rate reductions?

Position: Sprint's conditional position (please see Joint Motion for Reconsideration or Clarification) is generally, yes. However, IXCs should be allowed to have up to 60 days from the time that ILEC access reductions are effective in order to implement tariff, billing and other administrative changes necessary to make flow-through price adjustments.

Issue 8: If the IXCs receive any access rate reductions, how long should the IXC revenue reductions remain in place so that the benefits flow through to the residential and business customers: a) for each implemented reduction and b) once the ILECs reach parity?

Position: Sprint's conditional position (please see Joint Motion for Reconsideration or Clarification) is that market forces will insure that the revenue benefits of access reductions will be effective in maintaining the revenue benefits of the access reductions. Nevertheless, each provider required to make a flow-through filing should reduce average prices by an amount at least equivalent to the access reduction on a per minute basis and should maintain those average price reductions for all three years of the access reductions plus at least one additional year.

Issue 9: How should the IXC flow-through of the benefits from the ILEC access rate reductions be allocated between residential and business customers?

Position: Sprint's conditional position (please see Joint Motion for Reconsideration or Clarification) is that the methodology contained in witness Kapka's direct testimony should be a guide for flow-through.

Issue 10: Will all residential and business customers experience a reduction in their long distance bills? If not, which residential and business customers will and will not experience a reduction in their long distance bills?

Position: Sprint's conditional position (please see Joint Motion for Reconsideration or Clarification) is that whether a customer will experience a reduction in his long distance bill will depend on his willingness to make intrastate long distance calls in any given billing period. It is impossible to state with any specificity which residential customers will and will not experience a reduction in their long distance bills.

Issue 11: Should these Dockets be closed?

Position: No position at this time.

G. STIPULATIONS: Sprint is not aware of any pending stipulations at this time.

H. PENDING MOTIONS: Sprint is aware that on November 20, 2003, the petitioning ILECs filed their Joint Motion of Verizon Florida, Inc.; Sprint-Florida, Inc.; and BellSouth Telecommunications, Inc.; for Reconsideration or Clarification of the Prehearing Officer's Second Order Modifying Procedure for Consolidated Dockets to Reflect Additional Docket, Associated Issues, and Filing Dates. ("Joint Motion for Reconsideration or Clarification") time.

I. PENDING REQUESTS FOR CONFIDENTIALITY

Sprint Communications Company, Limited Partnership's Request for Confidential Classification filed November 19, 2003.

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

K. STATEMENT OF ANY PENDING DECISION OF THE FCC OR ANY COURT THAT MIGHT IMPACT THE DECISION ON THESE ISSUES:

Sprint-Florida is not aware of any such decisions.

L. ANY OBJECTIONS TO A WITNESSES' QUALIFICATIONS AS AN EXPERT:

Sprint-Florida has no such objections at this time.

RESPECTFULLY SUBMITTED this 21st day of November, 2003.

A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", written over a horizontal line.

Charles J. Rehwinkel, Esq.

Fla. Bar No. 527599

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ATTORNEY FOR SPRINT LP