

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: December 30, 2003

SPRINT'S REVISED PREHEARING STATEMENT

Pursuant to the Orders Establishing Procedure, Order No. PSC-02-1513-PCO-TP, Order No. PSC-03-0288-PCO-TP, Order No. PSC-03-0776-PCO-TP, and Order No. PSC-03-1311-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

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CAF _____
CMP _____
COM 5
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC +
OTH _____

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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 (Confidential) RGF-2	Sprint Input Worksheet Sprint's Commission Approved Cost Factors
Jimmy R. Davis	Revised JRD-2 (Confidential) JRD-3 JRD-4 JRD-5 JRD-6 (Confidential) 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 costs studies and its prices derived from these costs 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 for Sprint 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: Sprint's 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 Sprint's collocation elements should be those recommended by Sprint in its cost study 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 to Accept Late-filed Discovery Responses, filed 8-18-03

I. PENDING CONFIDENTIALITY REQUESTS:

Sprint's Request for Confidential Classification for DN 07154-03, filed 8-5-03

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

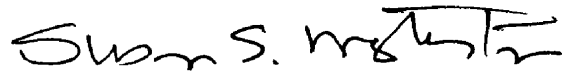
Sprint's Request for Confidential Classification for DN 09291-03, filed 9-26-03

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: Sprint is reviewing the Commission's order on the technical issues (Issues 1-8) in this proceeding, Order No. PSC-03-1358-FOF-TP, to determine how the Commission's ruling on those issues may affect Sprint's collocation costs and prices to be determined in the Commission's consideration of Issues 9 & 10. Sprint may seek leave of the Commission to file additional testimony and supporting cost studies if Sprint believes it is necessary to implement the Commission's order on the technical issues.

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

Order No. PSC-03-1358-FOF-TP on issues 1-8 in this docket, issued on November 26, 2003.

RESPECTFULLY SUBMITTED this 30th day of December 2003.

Handwritten signature of Susan S. Masterton in black ink, written in a cursive style.

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