



Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

December 30, 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

RECEIVED FPSC
COMMISSION
CLERK
DEC 30 PM 4:45

Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint's Notice of Service of Sprint Communications Limited Partnership's Answers to Staff's 1st Set of Interrogatories (Nos. 1-14) and 1st Request for Production of Documents (Nos. 1-7) and the original and 15 copies of Sprint Communications Limited Partnership's Notice of Intent to Request Confidential Classification.

Copies are being served on the parties in this docket 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

Susan S. Masterton

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

Enclosure

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- MMS _____
- SEC 1
- OTH 1 conf records

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 13584-03. The confidential material is in locked storage pending staff advice on handling.

TREATMENT NUMBER DATE
13583 DEC 30 8
FPSC-COMMISSION CLERK

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and U.S. mail on this 30th day of December, 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/Jeremy Susac
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Allegiance Telecom of Florida,
Inc.
Charles V. Gerkin, Jr.
9201 N. Central Expressway
Dallas, TX 75231

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

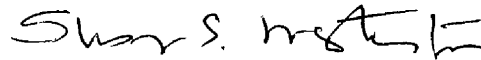
Miller Isar, Inc.
Andrew O. Isar
7901 Skansie Avenue, St. 240
Gig Harbor, WA 98335

NewSouth Communications
Jake E. Jennings
Regulatory Affairs & Carrier
Relations
Two N. Main Center
Greenville, SC 29601

Moyle, Flanigan, Katz Raymond
& Sheehan, P.A.
Jon C. Moyle, Jr., Esq.
The Perkins House
118 N. Gadsden St.
Tallahassee, FL 32301

Nuvox Communications, Inc.
Bo Russell, Vice-President
Regulatory & Legal Affairs
301 N. Main St.
Greenville, SC 29601

Messer Law Firm
Norman Horton
P.O. Box 1876
Tallahassee, FL 32302-1876



Susan S. Masterton

(+ Signed Protective Agreement)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE review: Location-Specific) Docket No. 030852-TP
Review for DS1, DS3, and Dark Fiber Loops,) Dated: December 30, 2003
and Route-Specific Review for DS1, DS3)
and Dark Fiber Transport)
_____)

**SPRINT COMMUNICATION COMPANY LIMITED PARTNERSHIP'S
NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION**

Sprint Communications Company Limited Partnership ("Sprint") pursuant to Rule 25-22.006, Florida Administrative Code, files this Notice of Intent to Request Confidential Classification and says:

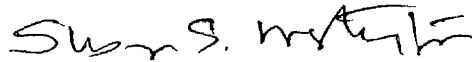
1. On December 10, 2003, Staff served its First Set of Interrogatories and First Request for Production of Documents on Sprint. Sprint is providing its responses to these requests on this date.
2. The information contained in Sprint's Responses to the following, includes confidential information that is proprietary to Sprint:

Attachment to Response to Interrogatory No. 3
Attachment to Response to Interrogatory No. 5
Response to Interrogatory No. 7(a)
Attachment to Response to Interrogatory No. 10
3. In order to allow the Commission staff to take possession of this confidential information without delay, Sprint is now filing this Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a). Sprint intends to subsequently file a Specific Request for Confidential Classification in accordance with the rule.

DOCUMENT NUMBER 03-011
13583 DEC 30 8
FPSC-COMMUNICATIONS

4. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

RESPECTFULLY SUBMITTED this 30th day of December 2003.



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

ATTORNEY FOR SPRINT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE review: Location-Specific)
Review for DS1, DS3, and Dark Fiber Loops,)
and Route-Specific Review for DS1, DS3)
and Dark Fiber Transport)

Docket No. 030852-TP
Dated: December 30, 2003

**SPRINT'S ANSWERS TO STAFF'S
FIRST SET OF INTERROGATORIES**

Sprint Communications Company L.P. ("Sprint" or the "Company"), pursuant to Rule 28-106.206, Florida Administrative Code, and Florida Rule of Civil Procedure 1.340, hereby provides the following answers to Staff's First Set of Interrogatories, served on November 20, 2003 ("Staff's First Set"). The answers were provided by John Felz, Director – State Regulatory.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 1
PAGE 1 OF 1**

1. (a) **Please identify all points within Florida at which you connect your local network facilities to the networks of carriers other than the incumbent LEC, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotel, data center, or similar facility.**
- (b) **For each transport facility identified in (a), please identify the cost of the facility, including the installation cost for any facilities that you have deployed yourself, and the rates, terms and conditions of any transport facilities that you obtain through a wholesale, lease, or resale arrangement, from any entity other an ILEC.**

Answer: Sprint does not connect its local network facilities to the networks of other carriers other than the incumbent LEC.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 2
PAGE 1 OF 1**

2. (a) Please identify all competing providers with which you are not affiliated that to your knowledge have deployed dark fiber facilities (including any facilities obtained on a long-term, indefeasible right of use basis) along any routes in Florida. For each such competitor, state your basis for making this assertion.
- (b) For each competing provider identified in (a), identify the particular route or routes along which the competitor is asserted to have such facilities. State whether or not to your knowledge those facilities terminate at a collocation arrangement where each end of the transport route is located at an ILEC premises, or in a similar arrangement at which one end of the transport route is located at an ILEC premises or where neither end is located at an ILEC premises.

Answer:

Sprint has knowledge of dark fiber deployed by Florida Power and Light. Sprint leases dark fiber from Florida Power and Light. See transport worksheet for details.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 3
PAGE 1 OF 1**

- 3. Please identify all fiber rings in Florida that you own or otherwise control, and identify the location (by street address and V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.**

Answer: Please refer to the attached confidential transport spreadsheet, filed in response to Staff's November 12 data request.

4.

(a) Have you entered into an agreement for joint construction of transport facilities with any ILEC?

Answer: No.

(b) If the response to (a) is affirmative, please identify the pairs of ILEC wire centers between which joint construction of transport facilities either has occurred or is planned to occur.

Answer: N/A

(c) If the response to (a) is affirmative, please identify the ILEC involved, when the agreement was entered into, and the status of the joint construction.

Answer: N/A

(d) If the response to (a) is negative, have you attempted to negotiate any agreement with an ILEC for the joint construction of transport facilities?

Answer: No.

(e) If the response to (d) is affirmative, please describe any attempts made to enter into such agreements and the results of such negotiations.

Answer: N/A

(f) If the response to (d) is negative, please explain why no such negotiations have been attempted.

Answer: Sprint provides no response.

(g) Have you entered into an agreement for joint construction of transport facilities with any other CLEC or utility company (e.g., cable television, electric, gas, water and sewer)?

Answer: No.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 4
PAGE 2 OF 2**

- (h) If the response to (g) is affirmative, please identify the beginning, ending and intermediate terminating points for all such routes where joint construction of transport facilities either has occurred or is planned to occur.**

Answer: N/A

- (i) If the response to (g) is affirmative, please identify, for each such agreement, the entities involved, when the agreement was entered into, the type of joint construction used (e.g., joint trenching, composite cable, etc.), the total cost savings achieved by the joint venture, and the status of the joint construction**

Answer: N/A

- (j) If the response to (g) is negative, have you attempted to negotiate any agreement with any other CLEC or utility company for the joint construction of transport facilities?**

Answer: No.

- (k) If the response to (j) is affirmative, please describe any attempts made to enter into such agreements and the results of such negotiations, whether you have evaluated any possible economic advantages of jointly constructing transport facilities and the results of any such evaluations.**

Answer: N/A

- (l) If the response to (j) is negative, please explain why no such negotiations have been attempted.**

Answer: Sprint provides no response.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 5
PAGE 1 OF 1**

5. (a) Please identify the address of each of your collocation arrangements in the state of Florida, the name of the ILEC central office in which it is located, and the ILEC.
- (b) For each collocation arrangement identified in response to (a), please identify the overall size of the arrangement and the amount of unused space in the collocation arrangement.
- (c) For each collocation arrangement identified in response to (a), please identify the date on which collocation space was turned over to you.
- (d) For each collocation arrangement identified in response to (a), please identify the date on which equipment was installed in the space and first used to provide local service. (Estimate if necessary.)
- (e) For each collocation arrangement identified in response to (a) that is not currently being used to provide local service, please indicate the date on which you intend to use the space to provide local service.

Answer: For Sprint's response to Interrogatory No. 5 (a) through (e), see attached confidential spreadsheet detailing collocation arrangements associated with transport.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 6
PAGE 1 OF 1**

6. (a) Please identify the address of each collocation arrangement in the state of Florida that you share with another entity, the identity of the other entity, and the size of your share of the arrangement.
- (b) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) you currently provide with the existing equipment located there.
- (c) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the equipment is not currently being used to provide but is capable of providing.
- (d) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.
- (e) For those services identified in response to (d), can the equipment located in the given collocation arrangement be upgraded to provide local service?
- (f) If the response to (e) is affirmative, please describe the nature of the required upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and any operational barriers to performing the upgrade.

Answer:

- (a) Sprint does not share any collocation arrangement with another entity.
- (b) N/A
- (c) N/A
- (d) N/A
- (e) N/A
- (f) N/A

SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 7
PAGE 1 OF 2

7. (a) Please identify the address of each of your collocation arrangements in the state of Florida that you obtain from an entity other than the ILEC, entity, the identity of the other entity, the size of the arrangement, and the amount of unused space in the collocation arrangement.
- (b) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) you currently provide with the existing equipment located there.
- (c) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the equipment is not currently being used to provide but is capable of providing.
- (d) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.
- (e) For those services identified in response to (d), can the equipment located in the given collocation arrangement be upgraded to provide local service?
- (f) If the response to (e) is affirmative, please describe the nature of the required upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and any operational barriers to performing the upgrade.

Answer:

(a) [REDACTED]

(b) IP services only

(c) None

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 7
PAGE 2 OF 2**

(d) None

(e) No

(f) N/A

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 8
PAGE 1 OF 1**

8. (a) Are you familiar with Fiberloops (www.fiberloops.com), a matchmaking service for companies looking for fiber, optical bandwidth and collocation space?
- (b) If the response to (a) is affirmative, are you now or have you been, a client of Fiberloops?
- (c) If the response to (b) is affirmative, please describe what services Fiberloops has provided or is providing your company.

Answer:

- (a) Sprint is not familiar with Fiberloops.
- (b) N/A
- (c) N/A

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 9
PAGE 1 OF 1**

9. (a) For each DS1, DS3, or dark fiber loops you have deployed to customer locations in Florida, please indicate (i) whether you are collocated in a central office that serves that building; (ii) the amount of cross-connect/termination capacity available at your collocation space for wholesale facilities provided; (iii) the time it takes to provision a loop to another carrier that is collocated in the same central office; and (iv) the time it takes to provision a loop to a carrier that is not collocated in the same central office.
- (b) With respect to the facilities identified in response to (a), please identify which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

Answer: Sprint's provisioning of DS1, DS3, or dark fiber loops to customer locations in Florida are provisioned from its own switch location (CLLI: ORLDFLER; address: 200 E. Robinson St., Orlando, FL). Based on this configuration, these questions are not applicable.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 10
PAGE 1 OF 1**

- 10. Please identify any customer locations, by address and capacity, to which you are currently in the process of deploying your own high-capacity loop facilities (currently being planned, designed, or under construction).**

Answer: Please refer to the attached confidential loop spreadsheet, filed in response to Staff's November 12 information request. No new construction to customer premises is planned at this time.

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 11
PAGE 1 OF 1**

11. (a) **Are you providing fixed wireless service to end users in the state of Florida?**
- (b) **If the response to (a) is affirmative, please identify the cities in which this service is being provided and state whether those facilities are capable of providing high capacity service.**
- (c) **If you are providing high capacity service using fixed wireless in the state of Florida, please identify the addresses of the specific building locations.**

Answer:

- (a) Affiliates of Sprint Communications Company L.P. provide data services to end-user customers in Melbourne, Florida utilizing MMDS fixed wireless technology. The service is being provided to a grandfathered set of customers only and is not being offered to new customers.
- (b) Melbourne, Florida. The facilities are not capable of providing two-way, high-capacity service.
- (c) N/A

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 12
PAGE 1 OF 1**

12. (a) Do you hold licenses for wireless spectrum in the state of Florida?
- (b) If the response to (a) is affirmative, please state in what areas in Florida and what percent of Florida customers could be covered using this spectrum.
- (c) If the response to (a) is affirmative, have you leased any of your licenses to other entities?
- (d) If the response to (c) is affirmative, please identify the entities to whom you have leased spectrum licenses.

Answer:

- (a) Affiliates of Sprint Communications Company L.P. hold wireless spectrum licenses for MMDS service in the following cities in Florida: Bradenton, Ft. Pierce, Melbourne, Naples and Tampa. Information on the percent of customers that could be covered using this spectrum is not available.
- (b) No.
- (c) No.
- (d) N/A

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 13
PAGE 1 OF 1**

13. (a) Over the past 5 years, have you entered into an agreement for joint construction of high capacity or dark fiber loops facilities with any ILEC, CLEC or utility company (e.g., cable television, electric, gas, water and sewer)?
- (b) If the response to (a) is negative, please describe any attempts made to enter into such an agreement and the results of such negotiations.
- (c) If the response to (a) is affirmative, please describe the number of such agreements by type of joint construction used (e.g., joint trenching, composite cable, etc.), the range, median and mode of the number of entities involved in the agreement, and the percent of cost savings achieved by joint construction.

Answer:

- (a) No.
- (b) No attempts have been made.
- (c) N/A

**SPRINT
DOCKET NO. 030851-TP
STAFF'S FIRST SET
INTERROGATORY NO. 14
PAGE 1 OF 1**

14. (a) Do you own or control an existing coaxial cable infrastructure?
- (b) If the response to (a) is affirmative, please identify (i) the average cost per foot to upgrade to fiber access; (ii) whether you are offering or plan to offer high capacity service; (iii) the area within the state of Florida covered by your coax cable infrastructure; and (iv) the area within the state of Florida covered by your fiber infrastructure.

Answer:

- (a) No.
- (b) N/A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE review: Location-Specific)
Review for DS1, DS3, and Dark Fiber Loops,)
and Route-Specific Review for DS1, DS3)
and Dark Fiber Transport)
_____)

Docket No. 030852-TP
Dated: December 30, 2003

**SPRINT'S RESPONSE TO STAFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rule of Civil Procedure, Sprint Communications Company L.P. ("Sprint" or the "Company"), by and through undersigned counsel, hereby responds to Staff's First Request for Production of Documents, as set forth below.

REQUESTS FOR PRODUCTION

- 1. Referring to Interrogatory No. 1(a), please provide any available maps or diagrams that show the location of the points of interconnection identified therein.**

Response: There are no documents responsive to this request.

- 2. Please provide all documents that support your response to Interrogatory No. 1(b).**

Response: There are no documents responsive to this request.

- 3. Referring to Interrogatory No. 2(a), please provide any available maps or diagrams that show the location of competitors' dark fiber facilities.**

Response: There are no documents responsive to this request.

4. **Please provide all documents that support your response to Interrogatory No. 2(b).**

Response: There are no documents responsive to this request.

5. **Referring to Interrogatory No. 3, please provide any available maps or diagrams that show the location of your fiber rings.**

Response: Sprint objects to this request for maps or diagrams on the grounds that identifying the locations of its fiber rings would disclose vulnerable spots in Sprint's network infrastructure and thereby undermine the security of that infrastructure.

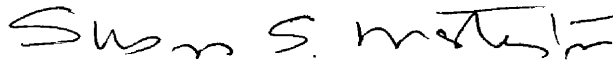
6. **Please provide copies of all agreements identified in response to Interrogatory No. 4(c).**

Response: There are no documents responsive to this request.

7. **Please provide copies of all agreements identified in response to Interrogatory No. 4(h).**

Response: There are no documents responsive to this request.

DATED this 30th day of December 2003.



SUSAN S. MASTERTON
P.O. Box 2214
Tallahassee, FL 32316-2214
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT