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February 24, 2004

## VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director  
Division of the Commission  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket No. 030852-TP

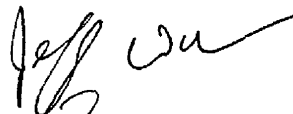
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's NOTICE OF SERVICE OF SPRINT-FLORIDA, INC.'S AND SPRINT COMMUNICATIONS COMPANY L.P.'S PUBLIC, NON-CONFIDENTIAL ANSWERS AND RESPONSES TO BELL SOUTH'S SECOND REQUEST FOR ADMISSIONS AND SECOND SET OF INTERROGATORIES (NOS. 8-32), AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 4).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

Enclosures

cc: All Parties of Record

DOCUMENT NUMBER-DATE

02732 FEB 24 04

FPSC-COMMISSION CLERK

**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.

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DOCKET NO. 030852-TP  
Filed: February 24, 2004

**NOTICE OF SERVICE OF SPRINT-FLORIDA, INC.'S AND SPRINT COMMUNICATIONS COMPANY L.P.'S PUBLIC, NON-CONFIDENTIAL ANSWERS AND RESPONSES TO BELL SOUTH'S SECOND REQUEST FOR ADMISSIONS AND SECOND SET OF INTERROGATORIES (NOS. 8-32), AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 4)**

PLEASE TAKE NOTICE that on this date Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint") have filed and served on the parties of record the attached public, non-confidential Answers and Responses to BellSouth's Second Request for Admissions and Second Set of Interrogatories (Nos. 8-32), and Third Request for Production of Documents (No. 4) served on February 4, 2004 (collectively, "Discovery Requests"). Sprint asserts that some of the information in its responses is proprietary confidential business information. Therefore, a confidential version of the responses to the Discovery Requests with confidential information highlighted has been (a) filed with the Division of the Commission Clerk along with a Claim of Confidentiality and a Notice of Intent to Request Confidential Classification and (b) served on parties that have executed a nondisclosure agreement with Sprint.

DATED this 24<sup>th</sup> day of February, 2004.



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ATTORNEYS FOR SPRINT-FLORIDA, INC.  
and SPRINT COMMUNICATIONS COMPANY  
LIMITED PARTNERSHIP

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (\*) 24th day of February, 2004, to the following:

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Beth Keating \*  
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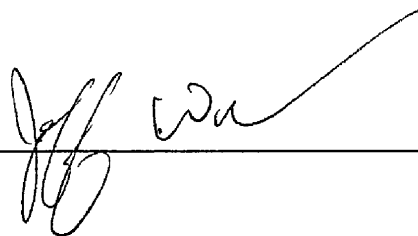
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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.

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DOCKET NO. 030852-TP  
DATED: February 24, 2004

**SPRINT'S PUBLIC, NON-CONFIDENTIAL ANSWERS AND RESPONSES TO  
BELLSOUTH'S SECOND REQUEST  
FOR ADMISSIONS AND SECOND SET OF INTERROGATORIES AND THIRD  
REQUEST FOR PRODUCTION OF DOCUMENTS**

Sprint-Florida, Incorporated ("Sprint" or the "Company"), pursuant to Rule 25-22.034, Florida Administrative Code, and Florida Rule of Civil Procedure 1.340, hereby provides the following answers and responses to BellSouth's Second Request for Admissions and Second Set of Interrogatories (Nos. 8-32), and Third Request for Production of Documents (No. 4) served on February 4, 2004 ("Discovery Requests").

**I. GENERAL OBJECTIONS.**

Sprint makes the following General Objections to the Discovery Requests, which general objections are hereby incorporated by reference into Sprint's specific responses and answers, below.

1. Sprint objects to the Definition of "Sprint," in paragraph 3 of the Definitions section to the extent that such Definition seeks to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons which are not parties to this proceeding on the grounds that such Definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiving this General Objection, and subject to other general and specific Objections, where

provided, answers will be provided on behalf of Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership, which are the certificated carriers authorized to provide regulated telecommunications services in Florida, and which are parties to this proceeding, relative, however, only to their intrastate operations in Florida.

2. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions therein to the extent they seek information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
3. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Interrogatories. Where provided, answers provided by Sprint to BellSouth's Discovery Requests will be provided subject to, and without waiving, this General Objection.
4. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this proceeding.
5. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of



Civil Procedure or Florida law.

6. Sprint objects to answering any request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent such Interrogatory seeks responsive information already in the public domain, or otherwise on record with the Commission or the Federal Communications Commission (“FCC”).
7. Sprint objects to each request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to which it is unduly burdensome, expensive, oppressive, or excessively time consuming for response thereto as written.
8. Sprint objects to each Interrogatory to the extent such Interrogatory seeks responsive information that constitutes “trade secrets” which are privileged pursuant to Section 90.506, Florida Statutes and/or “proprietary confidential business information” within the meaning of Section 364.183(3), Fla. Stat. To the extent any Interrogatory seeks proprietary business information that is not subject to a “trade secrets” privilege, and Sprint makes such responsive information available to BellSouth, Sprint only will make responsive information available to counsel for Sprint pursuant to an appropriate Protective Agreement, and subject to any requirements of the Commission relative to protecting such proprietary business information.
9. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates numerous documents that are not subject to either Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is impossible for Sprint to affirm that every responsive document in

existence has been provided in response to an Interrogatory. Instead, where provided, Sprint's responses will provide all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with the Interrogatory. Such search will include only a review of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, Sprint objects on the ground that compliance would be unduly burdensome.

## **II.**

### **Answers and Responses**

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 8  
PAGE 1 OF 1**

- 8. For every fiber-based collocation that listed in the confidential attachment to BellSouth's First Request for Admissions, First Set of Interrogatories (1-7) and Second Requests for Production of Documents (3) in this docket that you admit are yours, please provide:**
- a) A description of the location where the fiber facility terminated (ILEC central office, CLEC central office, customer location, manhole, etc.). For the purposes of this interrogatory, please assume that the fiber facility begins in the fiber-based collocation site listed in the confidential attachment referred to above and provide information concerning the end or termination point of the fiber facility.**
  - b) The CLLI of the end of termination location, if the end or termination point is not in an ILEC central office.**
  - c) The street address, including city, of the location, if the end or termination point is not in an ILEC central office.**

**For the purpose of this and the following question, fiber-based collocations are collocations to which you connect your own fiber, or fiber you lease from another carrier not including BellSouth.**

Answer: See Attachment 8.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 9  
PAGE 1 OF 1**

9. For each fiber facility identified in response to Interrogatory 8 above, state whether you own the fiber or lease it from another carrier. If you lease it from another carrier, please provide:
- a) The name of the carrier that provides the fiber, and
  - b) State whether the fiber is leased under a long term (10 year or more) IRU.

Answer: See Attachment 8.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 10  
PAGE 1 OF 1**

- 10. Please provide a list of all the links of your network in Florida where you use your own facilities or lease dark fiber from another carrier, including an ILEC. For the purpose of this question a link is defined as a fiber-based transmission facility with optronics that you own at both ends (e.g., in the case of a ring, every segment between two adjacent nodes is a link).**

**For each two ends of any link identified in response to this Interrogatory, please:**

- a) State whether it is an ILEC central office, a customer location or other point of interconnection**
- b) Provide the CLLI of the location (not necessary if it is not an ILEC central office)**
- c) Provide the street address, including city, of the location (not necessary if it is an ILEC central office for which you provided the CLLI)**

Objections:

As noted in its preliminary objections, Sprint objects to this Interrogatory on grounds that it seeks information that is beyond the scope of discovery (i.e., relevant or calculated to lead to the discovery of admissible evidence) and because answering would impose an undue burden on Sprint. This Interrogatory seeks information about “all of the links in [Sprint’s] network in Florida where [Sprint] use[s] [its] own facilities or lease[s] dark fiber from another carrier...” and is overbroad and burdensome because it seeks information about parts of Sprint’s network other than the high capacity loops and transport at issue in this case. Sprint also objects to this Interrogatory on grounds that the term “link” is vague and ambiguous.

Answer: Subject to and without waiving the foregoing objections, see response to No. 13.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 11  
PAGE 1 OF 1**

11. **For every link identified in response to Interrogatory 10, state whether you own the entire end-to-end fiber link, lease the entire end-to-end fiber link from other carrier(s) or own segments of the link and lease other segments from other carrier(s). If you lease the entire link or lease segments of the link from other carrier(s), please provide:**
- a) **The name of the carrier(s) that provides the fiber**
  - b) **If any segment of the link is not leased on a long-term basis (10 years or more)**

Objections:

As noted in its preliminary objections, Sprint objects to this Interrogatory on grounds that it seeks information that is beyond the scope of discovery (i.e., relevant or calculated to lead to the discovery of admissible evidence) and because answering would impose an undue burden on Sprint. This Interrogatory seeks information about “all of the links in [Sprint’s] network in Florida where [Sprint] use[s] [its] own facilities or lease[s] dark fiber from another carrier...” and is overbroad and burdensome because it seeks information about parts of Sprint’s network other than the high capacity loops and transport at issue in this case. Sprint also objects to this Interrogatory on grounds that the term “link” is vague and ambiguous.

Answer: Subject to and without waiving the foregoing objections, see response to No. 13.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 12  
PAGE 1 OF 1**

**12. For every link identified in response to Interrogatory 10, please provide:**

- a) The lit capacity of the link**
- b) Number of lit and spare fibers**
- c) Whether the link is channelized at the DS3 and DS1 levels**

Objections:

As noted in its preliminary objections, Sprint objects to this Interrogatory on grounds that it seeks information that is beyond the scope of discovery (i.e., relevant or calculated to lead to the discovery of admissible evidence) and because answering would impose an undue burden on Sprint. This Interrogatory seeks information about “all of the links in [Sprint’s] network in Florida where [Sprint] use[s] [its] own facilities or lease[s] dark fiber from another carrier...” and is overbroad and burdensome because it seeks information about parts of Sprint’s network other than the high capacity loops and transport at issue in this case. Sprint also objects to this Interrogatory on grounds that the term “link” is vague and ambiguous.

Answer: Subject to and without waiving the foregoing objections, see response to No. 13.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 13  
PAGE 1 OF 1**

**13. If Sprint has deployed any high capacity loops in the Southeastern States, please:**

- a) Provide the lit capacity of the link**
- b) State whether the link is channelized at the DS3 and DS1 levels**

Answer: See Attachment 13 "loop\_questions\_FL.xls" provided in response to Staff's Information Request filed November 24, 2003.



- 14. Please describe in detail the materials and labor required to channelize an OCn facility in DS3 and DS1 facilities.**

Answer:

Sprint witness Dickerson outlined several world complexities associated with self provisioning dedicated transport in his surrebuttal testimony (page 6 line 8 through page 7 line 12). Many of these complexities go well beyond the activity of engineering and installing the additional equipment listed below.

The labor required to channelize OCn facilities into DS3 and DS1 includes engineering and installation for each piece of equipment as developed by Sprint Engineering as typical work durations.

The following represents a list of the material required to channelize OCn facilities into DS3 and DS1

**FIBER TIP CABLE**

This is a piece of fiber cable used to connect the fiber from the SONET terminal to a patch panel.

**FIBER PATCH PANEL**

All fibers coming into or out of a SONET terminal are connected to a patch panel in the central office from which they are connected to other central office equipment. The panel modeled here is a 72-fiber patch panel, chosen as being representative of the panels currently installed by Sprint.

**SONET TERMINAL SHELF (OC3)**

The OC3 terminal line item includes, the shelf, bay, transmitters and receivers, spares, cabling, and all other common equipment such as software used in a typical OC3 SONET terminal configuration.

**DS3 CARD**

The DS3 card is the card required to add or terminate traffic on an OC3 terminal at the DS3 bandwidth level.

**DS1 CARD**

The DS1 card is the card required to add or terminate traffic on an OC3 terminal at the DS1 bandwidth level.

**SONET TERMINAL SHELF (OC12)**

The OC12 terminal line item includes the shelf, bay, transmitters and receivers, spares, cabling, and all other common equipment such as software used in a typical OC12 SONET terminal configuration.

**OC3 Card**

The OC3 card is the card required to add or terminate traffic on an OC12 terminal at the OC3 bandwidth level.

**4 DS3 CARD (OC12)**

The DS3 Card (OC12) is a DS3 Quad Card Set that is required to add or terminate traffic on an OC12 terminal at the DS3 bandwidth.

**SONET TERMINAL SHELF (OC48U 2-FIBER)**

The OC48 2-fiber terminal line item includes the shelf, bay, transmitters and receivers, spares, cabling, and all other common equipment used in a typical OC48 2-fiber SONET terminal configuration.

**4 OC3 CARD**

The 4 OC3 card is the card required to add or terminate traffic on an OC48 2-fiber terminal at the OC3 bandwidth level.

**12 DS3 CARD**

The 12 DS3 card is required to add or terminate traffic on an OC48 2-fiber terminal at the DS3 bandwidth level.

**DSM-DS1 Interface**

The DSM-DS1 is required to add or terminate traffic on an OC192 4-fiber terminal at the DS1 bandwidth level.

**SONET TERMINAL SHELF (OC48B 4-FIBER)**

The OC48 4-fiber terminal line item includes the shelf, bay, transmitters and receivers, spares, cabling, and all other common equipment used in a typical OC48 4-fiber SONET terminal configuration.

**OC3 CARD**

The OC3 card is the card required to add or terminate traffic on an OC48 4-fiber terminal at the OC3 bandwidth level.

**3 DS3 CARD**

The 3 DS3 card set is required to add or terminate traffic on an OC48 4-fiber terminal at the DS3 bandwidth level.

**SONET Terminal Shelf (OC192B)**

The OC192 4-fiber terminal line item includes the shelf, bay, transmitters and receivers, spares, cabling, and all other common equipment used in a typical OC192 4-fiber SONET terminal configuration.

**OC48 Card (Tributary)**

The OC48 card is the card required to add or terminate traffic on an OC192 4-fiber terminal at the OC48 bandwidth level.

**4 OC3 Card**

The 4 OC3 card set is required to add or terminate traffic on an OC192 4-fiber terminal at the OC3 bandwidth level.

**DSM-DS1 Interface**

The DSM-DS1 is required to add or terminate traffic on an OC192 4-fiber terminal at the DS1 bandwidth level.

**DSX3 CROSS CONNECT SHELF**

The Cross Connect Shelf item comprises all the common equipment of a DSX3 cross connect. This is used for arranging, rearranging, and testing circuits at the DS3 level.

**DSX3 CROSS CONNECT CARD**

The DSX3 card used in the DSX3 cross connect has a capacity of one DS3.

**DSX1 CROSS CONNECT JACK FIELD**

The Cross Connect Jack Field is a cross connect used for arranging, rearranging, and testing circuits at the DS1 level. The entire cross connect used has a total capacity of 84 DS1s.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 15  
PAGE 1 OF 1**

**15. Please provide your costs in materials and labor, including any discounts from equipment vendors, for each of the elements in Interrogatory 14.**

Answer: The total cost of each component required to channelize OCn facilities into DS3 and DS1 is listed in the table below. The terminal equipment investments represent the investment for the entire shelf and common equipment. The related terminal card investments represent the cost per card by bandwidth option (DS1, DS3, OC3, OC48).

All investment amounts represent vendor costs for equipment configured for typical usage. Shipping and handling are included in the investment amount shown.

EF&I Investment per Unit is the sum of Material, Engineering/Installation Labor and Sales Tax. The costs shown below do not include the costs of the complexities covered in Sprint witness Dickerson surrebuttal testimony (page 6 line 8 through page 7 line 12) associated with self provisioning dedicated transport.

**Material**

**Cost of EF&I  
Investment per Unit**

|                                |            |
|--------------------------------|------------|
| Fiber Tip Cable (Per System)   | \$ XXXX.XX |
| Fiber Patch Panel (Per System) | XXXX.XX    |
| SONET Terminal Shelf (OC3)     | XXXXXX.XX  |
| DS3 Card                       | XXXXXX.XX  |
| DS1 Card                       | XXXXXX.XX  |
| SONET Terminal Shelf (OC12)    | XXXXXX.XX  |
| OC3 Card                       | XXXXXX.XX  |
| 4 DS3 Card (OC12)              | XXXXXX.XX  |
| SONET Terminal Shelf (OC48U)   | XXXXXX.XX  |
| 4 OC3 Card                     | XXXXXX.XX  |
| 12 DS3 Card (OC48U)            | XXXXXX.XX  |
| DSM - DS1 Interface            | XXXXXX.XX  |
| SONET Terminal Shelf (OC48B)   | XXXXXX.XX  |
| OC3 Card                       | XXXXXX.XX  |
| 3 DS3 Card (OC48B)             | XXXXXX.XX  |
| SONET Terminal Shelf (OC192B)  | XXXXXX.XX  |
| OC48 Card (Tributary)          | XXXXXX.XX  |
| 4 OC3 Card                     | XXXXXX.XX  |
| DSM - DS1 Interface            | XXXXXX.XX  |
| DSX3 Cross Connect Shelf       | XXXXXX.XX  |
| DSX3 Cross Connect Card        | XXXXXX.XX  |
| DSX1 Cross Connect Jack Field  | XXXXXX.XX  |

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 16  
PAGE 1 OF 1**

- 16. Please describe the steps involved in the channelization operation in Interrogatory 14, beginning with a request to channelize through having operational DS1s and DS3s, and provide an estimate of the time required to complete each step.**

Answer:

Sprint witness Dickerson outlined several world complexities associated with self provisioning dedicated transport in his surrebuttal testimony (page 6 line 8 through page 7 line 12). Many of these complexities go well beyond the activity of provisioning the dedicated transport equipment as outlined below.

The steps and associated time to provision a DS1 Dedicated transport are as follows:

Electronic service order (6.9 minutes)  
Circuit engineering and provisioning (120 minutes)  
Travel to job (29.6 minutes)  
DSX-1 connectivity (14 minutes)  
Plug in Card (4 minutes)  
End to end testing (30 minutes)  
Close order (5 minutes)

The steps and associated time to provision a DS3 Dedicated transport are as follows:

Electronic service order (6.9 minutes)  
Circuit engineering and provisioning (120 minutes)  
Travel to job (29.6 minutes)  
DSX-3 connectivity (28 minutes)  
Plug in Card (4 minutes)  
End to end testing (30 minutes)  
Close order (5 minutes)

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 17  
PAGE 1 OF 1**

17. **Affirm or deny that you provide other carriers with DS1, DS3 or dark fiber special access, private line or similar services between a point of interconnection in Florida (ILEC central office, CLEC central office, point of presence, carrier hotel, data center, etc.) and a customer location. The definition of a carrier for this question should include all local, national and global providers of voice or data services to retail or wholesale customers.**

Answer: Affirm.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 18  
PAGE 1 OF 1**

**18. If you answered in the affirmative to question 17:**

- a) Describe the types of services you provide to other carriers that meet the definition above.**
- b) Affirm or deny that in some cases you use loop facilities that you own to provide the services described.**
- c) Provide a list of customer locations where you have loop facilities that you own for which you have refused to use your own loop facilities to provide the services described above when requested by a carrier. In each case, explain the reasons why you refused to offer service over your own loop facilities.**

Answer:

- a) Sprint provides transport services to certain carrier customers from the carrier's location to Sprint's CLEC switch.
- b) Affirm.
- c) Sprint provides service directly to certain carrier customers, but does not provide wholesale access to its high capacity end user loop facilities to carrier customers.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 19  
PAGE 1 OF 1**

19. **Affirm or deny that you provide other carriers with DS1, DS3 or dark fiber transmission facilities between a collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) in a BellSouth central office and any point of interconnection (ILEC central office, CLEC central office, point of presence, data center, carrier hotel, etc.) in Florida. The definition of carrier for this question should include all local, national and global providers of voice or data services to retail or wholesale customers.**
- a) **Describe the types of services you provide to other carriers that meet the definition above.**
  - b) **Provide a list of all BellSouth central offices where you have collocations to which you have refused to provide the services described above when requested by a carrier. In each case, explain the reasons why you refused to offer service to that specific BellSouth central office.**

Answer: Deny.

- a) Not applicable.
- b) Requested information is not available.



**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 20  
PAGE 1 OF 1**

- 20. Please describe any and all attempts you have made to verify wholesale availability with carriers that BellSouth classified as wholesalers as identified as SWP-1 and SWP-6, exhibits to the Direct Testimony of Shelley Padgett filed in this proceeding.**

Answer: Because Sprint was not identified as a wholesale provider, Sprint has not attempted to verify the wholesale information identified on SWP-1 or SWP-6. Sprint has focused on investigating the assertions made by BellSouth as they relate to Sprint regarding self-deployment triggers. Sprint believes that other carriers have similarly investigated the assertions made by BellSouth regarding the carriers' facilities.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 21  
PAGE 1 OF 1**

- 21. Describe all the network equipment that you typically install in a building in order to bring that building “on-net.” This includes all equipment required to terminate the fiber cable at the building, the necessary electronics to serve customers and any incremental equipment required in other parts of your network to support the new “on-net” building.**

Answer: Sprint is still gathering this information and will respond shortly.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 22  
PAGE 1 OF 1**

22. Please provide your costs in material and labor, including any discounts from equipment vendors, for each of the elements identified in response to Interrogatory 21, above.

Answer: Sprint is still gathering this information and will respond shortly.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 23  
PAGE 1 OF 1**

- 23. Please provide the calculation for the costs described in response to Interrogatory 44 for: 1) a building where you provide one DS3 to a retail customer; 2) a building where you provide 20 DS1s to retail customers; and 3) a building where you provide two DS3s and 15 DS1s to retail customers.**

Answer: There is no interrogatory 44.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 24  
PAGE 1 OF 1**

- 24. Please state how much time it typically takes to bring a building “on-net” from a nearby building or central office that is already “on-net.”**

Answer: 120 days from project approval, assuming no extenuating fiber impediments. The time it takes to obtain project approval however can widely vary depending on the findings of a field survey to determine what would have to be done to bring the building “on-net”. In addition, this interval could be much longer depending on the complexities of cut and restore of streets, sidewalks, paved parking lots; the availability or construction of conduit from the street to the building; the availability or construction of cable entrance facilities to the customer; and the availability or preparation of suitable telecommunications space to be used to serve the customer.

SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 25  
PAGE 1 OF 1

25. On page 10 of his Direct Testimony, FCC witness Gary Ball states that CLECs' "fiber rings typically only connect aggregation points, such as collocation arrangements to a carrier's switching or hub site. A few major customer sites sometimes will be included on the ring, but most CLEC networks only reach a handful of sites in any state." (Underline added) Affirm or deny that you have customers included on any fiber rings that you own or lease in the state of Florida as described by Mr. Ball. If you affirm, then:
- a) provide the number of customers included on the ring.
  - b) provide the locations, by street address of those customers,
  - c) identify all fiber-based collocations connected in any way to that ring,
  - d) identify the capacity of that fiber ring,
  - e) identify the total capacity of the "lateral" facility (see Rebuttal Testimony of Jay M. Bradbury, page 26), and
  - f) identify the capacity on the lateral in use and the unused capacity.

Answer: Affirm. Sprint's deployment of high-capacity loops in Florida were expressly constructed utilizing ring technology for the purpose of providing service to customers and are connected directly to Sprint's CLEC switch. Sprint's high capacity loop facilities do not utilize rings that are routed through collocations located in ILEC central offices.

a) through f) See Attachment 13.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 26  
PAGE 1 OF 1**

26. On page 12 of his Direct Testimony, FCCA witness Gary Ball states that “in many situations, a CLEC will serve two ILEC central offices that are not on the same fiber ring. Although it is theoretically possible to connect central offices on different fiber rings, transport routes linking the two central offices are not ordinarily provisioned in this manner.” (Underline added) Affirm or deny that you have transport facilities between any two BellSouth central offices that are on different fiber rings. If you affirm then:
- a) Identify the pairs of BellSouth central offices that are connected with transport facilities,
  - b) Identify all fiber based collocations that you have on the two fiber rings that serve these two central offices, and
  - c) State whether either of these fiber rings are interconnected with an other fiber ring and describe the manner in which they are interconnected.

Answer: Deny. Sprint has not deployed transport facilities on separate rings between two BellSouth central offices.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 27  
PAGE 1 OF 1**

27. **On page 6 of his rebuttal testimony, FCCA witness Gary J. Ball states, “Although a CLEC may possess a facility that passes by two collocations, it will only rarely connect those two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE.” State whether you agree with Mr. Ball and, if so, (a) describe the circumstances that justify connecting two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE, and (b) describe the method of connecting two collocations, or facilities used, that creates a service configuration that is functionally equivalent to the dedicated transport UNE.**

Answer:

Sprint agrees with the FCCA position on this issue.

- (a) A CLEC’s decision to connect two collocations would be driven by a CLEC’s need to transport traffic between the two collocations and the volume of such traffic. The decision would most certainly consider the economic conditions associated with deploying the facilities needed to connect the two collocations.
- (b) There could be various methods for connecting the two collocations, including the CLEC self-deploying the fiber facility or leasing facilities from a third-party supplier.



**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 28  
PAGE 1 OF 1**

28. On page 6 of his rebuttal testimony, FCCA witness Gary J. Ball states, “Although a CLEC may possess a facility that passes by two collocations, it will only rarely connect those two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE.” Identify each and every instance in the state of Florida where you possess a facility that passes by two collocations, and you have connected those two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE.

Answer:

Sprint has collocations in the [REDACTED] and [REDACTED] BellSouth central offices which are connected to a fiber facility deployed by Sprint.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 29  
PAGE 1 OF 1**

29. **On pages 18 and 19 of his Rebuttal Testimony, FCCA witness Gary Ball makes the statement that “[I]t is fairly common for a CLEC to have facilities only to one customer or floor in a particular building. For a variety of reasons, a CLEC may have entered a building to serve only a particular customer, and may have provisioned what is called ‘Fiber to the Floor’.” Identify each and every instance in which you have “entered a building” and self provisioned facilities to serve only a particular customer or floor. Provide the name and/or location of the building, the type and capacity of the facility that you have self provisioned, and, in the case of service to a floor, the number of customers served.**

Answer: Sprint has only provisioned facilities to buildings where all customers in the building can be served.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 30  
PAGE 1 OF 1**

- 30. On pages 18 and 19 of his Rebuttal Testimony, FCCA witness Gary Ball makes the statement that “[I]t is fairly common for a CLEC to have facilities only to one customer or floor in a particular building. For a variety of reasons, a CLEC may have entered a building to serve only a particular customer, and may have provisioned what is called ‘Fiber to the Floor.’” Affirm or deny that you agree with Mr. Ball’s statement. State whether you agree with Mr. Ball and if you agree, describe each and every reason that would cause you to enter a building to serve only a particular customer, or provision “Fiber to the Floor.”**

Answer: Sprint has only provisioned facilities to buildings where all customers in the building can be served.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 31  
PAGE 1 OF 1**

- 31. Describe the decision-making process that you follow in deciding to self-deploy loop or transport facilities as opposed to leasing them from a third party, including BellSouth.**

Answer: Any decision to self-deploy loop or transport facilities in lieu of leasing from a third party would be based on a location or route specific economic analysis. A comprehensive, location or route specific business case analysis would be completed taking into account the following variables:

- a. Expected customer revenue opportunities.
- b. Ability to gain access to the building, including any related costs of access.
- c. Potential revenue growth from additional customers.
- d. Assessment of customers' willingness to enter into contracts to provide certainty of available revenues.
- e. Engineering costs necessary to design and build the facility.
- f. Costs of material including fiber cable, terminals, conduit, etc.
- g. Costs of labor associated with installing the facility.
- h. Construction costs associated with placing the facility including cutting and restoring streets, parking lots, sidewalks, landscaping, etc.
- i. Costs associated with gaining access to buildings and/or rights-of-way.
- j. Costs associated with local zoning and/or permitting
- k. Capital funding for the project given the project's priority when compared with other potential needs for capital.
- l. Any other location or site-specific issues affecting revenues or costs at the location.

**SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 32  
PAGE 1 OF 1**

**32. If you have denied any of the previous Request for Admissions, state all facts and identify all documents that support such denial.**

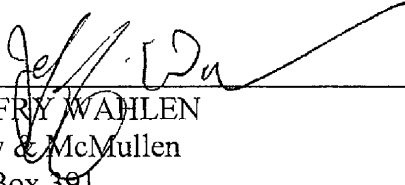
Answer: See answers above. Except for the documents referenced in the answers, there are no documents responsive to this request.

REQUESTS FOR PRODUCTION

4. **Produce any documents identified in response to Interrogatories 8 through 32 above.**

Response: There are no documents beyond those provided in Sprint's responses to Interrogatories 8 through 32.

DATED this 24th day of February, 2004.

  
\_\_\_\_\_  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via Electronic Mail,

U. S. Mail or Hand Delivery (\*) 26th day of February, 2004, to the following:

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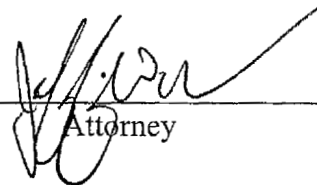
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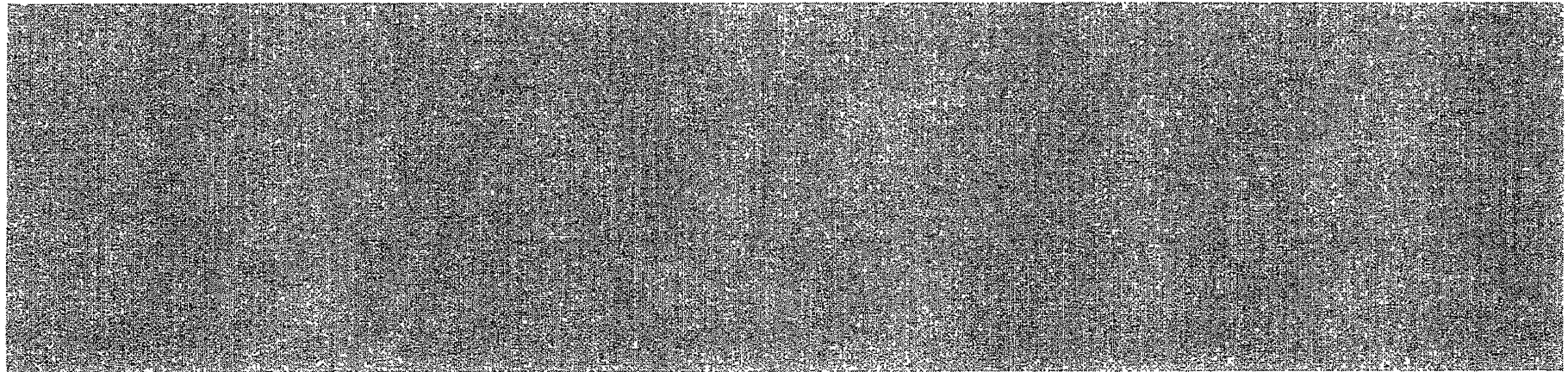


Attorney

Sprint  
Docket No. 030852-TP  
BellSouth's Second Request for Admissions and Second Set of Interrogatories  
Filed: February 24, 2004  
Interrogatory No. 8 and 9

| 8 a)<br>Termination<br>Point | 8 b)<br>Termination<br>CLLI | 8 c)<br>Street<br>Address | City | 9<br>Own Fiber or Lease? | 9 a)<br>Lease from | 9 b)<br>IRU? |
|------------------------------|-----------------------------|---------------------------|------|--------------------------|--------------------|--------------|
|------------------------------|-----------------------------|---------------------------|------|--------------------------|--------------------|--------------|

*Attachment B*



|    | A                    | B    | C   | D                | E | F                    | G                        | H                 | I                 | J                                 | K                                | L                                | M                             | N                            | O                            | P                 | Q                        | R                 | S                 | T                                 | U                                | V                                | W                             | X                            | Y                            | Z  | AA                | AB                 | AC           | AD            | AE           | AF          | AG               | AH                   |  |  |  |  |  |  |  |  |  |
|----|----------------------|------|-----|------------------|---|----------------------|--------------------------|-------------------|-------------------|-----------------------------------|----------------------------------|----------------------------------|-------------------------------|------------------------------|------------------------------|-------------------|--------------------------|-------------------|-------------------|-----------------------------------|----------------------------------|----------------------------------|-------------------------------|------------------------------|------------------------------|--|-------------------|--------------------|--------------|---------------|--------------|-------------|------------------|----------------------|--|--|--|--|--|--|--|--|--|
| 1  |                      |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 2  | Customer Information |      |     |                  |   | Self-Providers       |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              | Wholesalers       |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 3  | Street Address       | City | Zip | Wire Center CLLI |   | High-Capacity        | Number of circuits       |                   |                   |                                   |                                  | High-Capacity                    | Number of circuits            |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 4  |                      |      |     |                  |   | Self-Provider? (Y/N) | Dark Fiber? (X or blank) | DS1? (X or blank) | DS3? (X or blank) | # Dark Fiber provisioned circuits | # DS1 level provisioned circuits | # DS3 level provisioned circuits | # Dark Fiber working circuits | # DS1 level working circuits | # DS3 level working circuits | Wholesaler? (Y/N) | Dark Fiber? (X or blank) | DS1? (X or blank) | DS3? (X or blank) | # Dark Fiber provisioned circuits | # DS1 level provisioned circuits | # DS3 level provisioned circuits | # Dark Fiber working circuits | # DS1 level working circuits | # DS3 level working circuits | Point-to-Point (P) or Ring (R) configuration | Accessible? (Y/N) | Sole Access? (Y/N) | Using? (Y/N) | Giving? (Y/N) | Owner? (Y/N) | Loop Owner? | Loop Wholesaler? | Nature of agreement? |  |  |  |  |  |  |  |  |  |
| 4  | 1                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 5  | 2                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 6  | 3                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 7  | 4                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 8  | 5                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 9  | 6                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 10 | 7                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 11 | 8                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 12 | 9                    |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 13 | 10                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 14 | 11                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 15 | 12                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 16 | 13                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 17 | 14                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 18 | 15                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 19 | 16                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 20 | 17                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 21 | 18                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 22 | 19                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 23 | 20                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 24 | 21                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 25 | 22                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 26 | 23                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 27 | 24                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 28 | 25                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 29 | 26                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 30 | 27                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 31 | 28                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 32 | 29                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 33 | 30                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 34 | 31                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 35 | 32                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 36 | 33                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 37 | 34                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 38 | 35                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 39 | 36                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |
| 40 | 37                   |      |     |                  |   |                      |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |                   |                          |                   |                   |                                   |                                  |                                  |                               |                              |                              |  |                   |                    |              |               |              |             |                  |                      |  |  |  |  |  |  |  |  |  |

Attachment 13