

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Sprint-Florida, Inc. for	)	
Arbitration of an Interconnection Agreement	)	Docket No. 041464
with Florida Digital Network, Inc. Pursuant to	)	
Section 252 of the Telecommunications	)	Filed June 29, 2005
Act of 1996	)	
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**FDN COMMUNICATIONS' FIRST MOTION TO COMPEL**

Pursuant to Rules 28-106.204 and 28-106.206, Florida Administrative Code, Florida Digital Network, Inc., d/b/a FDN Communications ("FDN") hereby moves the Commission to compel Sprint to respond to FDN's Interrogatories Nos. 1 – 81 and 83 - 92 and Requests for Production of Documents Nos. 1 – 15 and provide FDN with opportunity to file testimony on the discovery responses compelled. In support of this motion, FDN states as follows:

1. FDN served Sprint with the above identified discovery requests on June 3, 2005.

On June 13, 2005, Sprint filed general and specific objections to FDN's discovery. In its responses to FDN's discovery, Sprint failed to answer virtually all of FDN's discovery questions. Sprint's objections and responses are attached hereto as Exhibit A.

**Interrogatories Nos. 1-81, 83-90; Document Requests 1 - 15**

2. Pursuant to Section 252 of the federal Communications Act (the "Act"), FDN has the legal right to arbitrate, and the Commission has the duty to resolve, all of the issues identified by the parties to the extent they are covered by the local competition provisions of the Act. Since the inception of this proceeding, UNE rates have been an issue in this arbitration. Sprint's own arbitration petition identifies the issue as, "What are the appropriate rates for UNEs provided by Sprint to FDN?"<sup>1</sup> In the Order Establishing Procedure,<sup>2</sup> the parties modified that

<sup>1</sup> See Sprint Petition to Arbitrate at p. 7. In its response to Sprint's petition, FDN agreed that the appropriate rates were an issue to be arbitrated.

language as follows: “What are the appropriate rates for UNEs and related services provided under the Agreement?”<sup>3</sup> Sprint would effectively re-write the issue to read, “Should FDN be required to pay the rates established in Docket No. 990649B?” That is not, and never has been, the issue that is before this Commission.

3. Though it does not say so expressly, Sprint seems to suggest that FDN be estopped from litigating any variation from the Commission’s now nearly three-year-old decision in Docket No. 990649B, which is based on four-year-old data and assumptions. There is no exception written into Section 252 of the Act which permits that result. Nor does any Commission precedent, such as the Global Naps order that Sprint cited in its recent Motion to Strike,<sup>4</sup> stand for the proposition that a party is foreclosed from arbitrating an issue the Commission addressed previously in a generic case. While the Global Naps case does refer to a prior determination the Commission made in a generic proceeding, and the Commission refers to the generic case as supportive precedent, there is no language whatsoever in that order to support the absolute issue preclusion Sprint advocates in this case. To completely foreclose FDN from arbitrating UNE rates in this proceeding is inconsistent with the Telecom Act and Commission precedent.

4. The Commission has permitted carriers have to arbitrate issues that are the same as or similar to those addressed in generic dockets, the GNAPs order being one example. Indeed, with respect to the “points of interconnection” issue in this case,<sup>5</sup> Sprint has taken

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<sup>2</sup> At no point prior or during the issue identification process did Sprint elucidate this new view of the UNE rate issue.

<sup>3</sup> See Issue No. 34, Order Establishing Procedure at p. 11.

<sup>4</sup> See Sprint Motion to Strike at p. 4.

<sup>5</sup> See Issue No. 36, page 11 of the Order Establishing Procedure.

positions inconsistent with the Commission's generic determinations.<sup>6</sup> Thus, Sprint itself seems to recognize a parties' right to arbitrate issues notwithstanding a generic determination – that is, except when it does not suit Sprint. Indeed, the Commission can and has specifically permitted parties to litigate appropriate UNE rates though rates were set in earlier in generic dockets.<sup>7</sup>

5. Nor is there any validity to Sprint arguments that FDN's efforts to arbitrate the UNE rates in this case amounts to an untimely or improper motion for reconsideration of the Commission's final order in Docket No. 990649B. Those rates were never formally incorporated into the parties' interconnection agreement and there was, thus, no need for FDN to seek further "reconsideration" or other action from the Commission with respect to that order. Besides, FDN does not seek reconsideration in this proceeding. Rather, FDN seeks to arbitrate, in an original action filed pursuant to Section 252 of the Act, the UNE rates Sprint has proposed to charge FDN on a going-forward basis, whether those rates stem from Docket No. 990649B and the data submitted therein, which is largely 4 years old,<sup>8</sup> or from any other Sprint cost study. Section 252 of the Telecom Act guarantees FDN that right.

6. Sprint does not deny that it failed to provide FDN the cost study which Sprint is obligated to provide pursuant to 47 C.F.R. §51.301(c). Indeed, Sprint even refuses to provide the cost study in response to FDN's Request for Production of Documents No. 1. Sprint ignores its

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<sup>6</sup> For instance, Sprint originally proposed the requirement that FDN establish multiple "virtual" points of interconnection per LATA, which was little more than a vehicle for Sprint to assess FDN additional costs notwithstanding that FDN was only required to have one point of interconnection per LATA. Though Sprint retreated from that demand, Sprint still maintains that FDN must have more than one point of interconnection per LATA (where Sprint has multiple tandems per LATA). Both of these positions are at odds with the Commission's rulings in generic Docket No. 000075.

<sup>7</sup> See, e.g. Docket No. 041338 where certain NRCs for BellSouth will be arbitrated although NRCs were addressed in Docket No. 990649A.

<sup>8</sup> See, e.g., FDN Panel Direct at p. 9.

obligations under the FCC's rules, and instead concocts a device to eliminate the UNE rate issue that has been part of this proceeding since inception, by asking the Commission to effectively rewrite the law on arbitration and the issue. The Commission must reject this attempt. At no point in Sprint's petition to arbitrate, at no point in the issue identification meetings between the parties and staff, and at no point in the continuing negotiations of the parties, did Sprint even suggest that FDN should be utterly foreclosed from arbitrating Sprint's proposed UNE rates. To be sure, Sprint stated its position that the UNE rates approved in Docket No. 990649B should be approved in this proceeding, but that is a far cry from completely eliminating the UNE rate issue posited in this case heretofore. As noted above, Sprint cannot by such fiat eliminate a CLEC's right to arbitrate an issue under Section 252 of the Telecom Act. And the Commission cannot ignore its duty under the Telecom Act and its own precedent by denying FDN the right to arbitrate the UNE rates.

7. FDN maintains that all of the information sought by FDN's Interrogatories Nos. 1 – 81 and 83 – 90 and Requests for Production of Documents Nos. 1 – 15 are relevant and material to Issue No. 34 in this proceeding. The information sought is reasonably calculated to lead to the discovery of admissible evidence regarding Issue No. 34 and therefore within the permissible scope of discovery. Issue No. 34 is properly before the Commission, and neither Sprint nor the Commission can bypass Section 252 of the Telecom Act and deny FDN the right to arbitrate the UNE rates.

8. In FDN's Motion for Postponement filed on June 7, 2005, in this docket, FDN sought postponement and rescheduling of the case schedule, but the Commission is yet to rule on that motion. Therefore, the Motion for Postponement notwithstanding, FDN moves the

Commission to grant the relief sought in this motion, to wit: (1) compel Sprint to provide immediate answers to FDN's discovery and (2) provide FDN meaningful opportunity to present testimony in support of its case on Issue No. 34 after FDN receives the compelled discovery by giving FDN at least 30 days to file additional direct testimony on the issue, by establishing filing dates for rebuttal and surrebutal on the issue, and by scheduling all other dates (including hearing dates) consistent with this request.<sup>9</sup> Without such relief, FDN is unquestionably and severely prejudiced in its ability to arbitrate Issue No. 34 due to Sprint's unrefuted failure to provide FDN with Sprint's cost study and responses to FDN's lawful discovery.

**Interrogatories Nos. 91 and 92**

10. In Interrogatory No. 91, FDN requested Sprint to provide the number of UNE dedicated transport circuits on each route where Sprint claims that FDN may not obtain UNE transport. Sprint's response did not answer the question; instead Sprint responded that FDN should know the answer. This is not a valid objection at trial, let alone in the process of discovery. FDN's interrogatory solicits Sprint's knowledge of discoverable facts. Whether FDN may have an answer, has no answer or thinks the answer is the number 10 or the color red does not matter. The question asks what Sprint knows. Even if FDN believes the answer "x," FDN is still entitled to know whether Sprint's answer is "x," "x - 5" or something entirely different from FDN's in an attempt to adduce the correct answer. This Interrogatory solicits information reasonably calculated to lead to the discovery of admissible evidence and is directly relevant to Issue No. 27 regarding commingled services and the charges therefor. FDN is entitled to know

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<sup>9</sup> At the time of this First Motion to Compel, FDN does not have the benefit of a Commission order disposing of FDN's Motion for Postponement. The relief FDN seeks in this First Motion to Compel may be effected by an order on FDN's Motion for Postponement. FDN therefore reserves the right to amend this motion as FDN may deem necessary after an order on its Motion for Postponement is issued.

how much it will be charged, when it will be charged, and on how it will be charged for commingled circuits. Therefore, the Commission should compel Sprint to immediately provide FDN an answer to Interrogatory No. 91.

11. In Interrogatory No. 92, FDN requested Sprint to provide the amount of intrastate access minutes and revenues Sprint billed FDN in 2004. Sprint's response did not answer the question; instead Sprint responded that FDN should know the answer. This is not a valid objection at trial, let alone in discovery. FDN's interrogatory solicits Sprint's knowledge of discoverable facts. Whether FDN may have an answer, has no answer or thinks the answer is the number 10 or the color red does not matter. The question asks what Sprint knows. Even if FDN believes the answer "x," FDN is still entitled to know whether Sprint's answer is "x," "x - 5" or something entirely different from FDN's in an attempt to adduce the correct answer. This Interrogatory solicits information reasonably calculated to lead to the discovery of admissible evidence and is directly relevant to the issues regarding the local calling area. Indeed, Sprint itself has placed the protection of access subsidies as a cornerstone of its defense, so Sprint is not in a position to argue that information is not within the scope of discovery. FDN is entitled to know how much Sprint believes those subsidies are. Therefore, the Commission should compel Sprint to immediately provide FDN an answer to Interrogatory No. 92.

12. The undersigned counsel attempted to contact lead counsel for Sprint before filing this motion, but lead counsel was out of town and unavailable.

WHEREFORE, for the reasons stated above, FDN Communications moves the Commission to deny Sprint's objections to the FDN Communications' discovery identified herein, compel Sprint to respond to said discovery immediately, and establish new filing dates as set forth in the body of this Motion.

RESPECTFULLY SUBMITTED, this 29<sup>th</sup> day of June, 2005.



Matthew Feil  
FDN Communications  
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Maitland, FL 32751  
(407) 835-0460

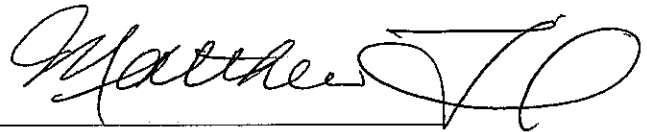
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent by e-mail and U.S. mail to the persons listed below this 29th day of June, 2005.

Ms Kira Scott and Mr. Jeremy Susac  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
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A handwritten signature in black ink, appearing to read "Matthew Feil", with a large, stylized flourish at the end.

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June 13, 2005

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
& Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 041464-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated are Sprint's General and Specific Objections to FDN's First Set of Interrogatories and Production of Documents.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850-599-1560.

Sincerely,

A handwritten signature in black ink that reads "Susan S. Masterton".

Susan S. Masterton

Enclosure

**CERTIFICATE OF SERVICE  
DOCKET NO. 041464-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. and electronic mail on this 13<sup>th</sup> day of June, 2005 to the following:

Kira Scott  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

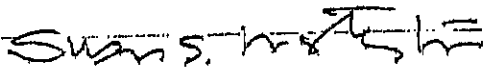
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Susan S. Masterton



### GENERAL OBJECTIONS

Sprint makes the following General Objections to FDN's First Set of Interrogatories and First Request for Production of Documents ("PODs"). These general objections apply to instructions and definitions and to each of the individual requests and interrogatories in the First Set of Interrogatories and First Request for PODs, respectively, and will be incorporated by reference into Sprint's answers when they are served on FDN.

1. Sprint objects to the requests to the extent that such requests seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. The party subject to this arbitration is Sprint-Florida, Incorporated and, without waiver of this objection and subject to any other applicable objection set forth herein, Sprint will respond accordingly.

2. Sprint has interpreted FDN's requests to apply to Sprint's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Sprint objects to each and every request insofar as the request is 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 requests. Any responses provided by Sprint to FDN's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Sprint will attempt to note in its responses each instance where this objection applies.

6. Sprint objects to FDN's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint objects to providing information to the extent that such information is already in the public record before the Commission, or elsewhere.

8. Sprint objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Sprint objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FDN requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for FDN pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. 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 countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs

or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

**SPECIFIC OBJECTIONS TO  
FDN'S FIRST SET OF INTERROGATORIES AND FIRST PODS**

**Interrogatory Nos. 1-90**

**Specific Objection:** Sprint objects to each of these Interrogatories on the grounds that the requests are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence, to the extent that these Interrogatories request information related to cost studies that were the subject of Docket No. 990649B-TP. In that docket these cost studies were evaluated and approved, with modifications, by the Commission in Order No. PSC-03-03-0058-FOF-TP (the "Sprint UNE Order"). FDN was a party to that proceeding, which involved extensive discovery addressing the same information and issues that FDN is attempting to revisit in this proceeding. Through its direct testimony and these Interrogatories, FDN improperly seeks to obtain reconsideration of the Sprint UNE Order, reconsideration that was denied by this Commission in Order No. PSC-03-0918-FOF-TP. FDN currently has an appeal of the Sprint UNE Order and the Order denying reconsideration pending in federal court. This appeal is the appropriate place for FDN to pursue its disagreement with the

Sprint UNE Order, rather than through attempting to revisit the exact same issues in this arbitration proceeding.

The issue that is currently before the Commission in this arbitration proceeding, as Sprint understands it, is whether or not FDN's new interconnection agreement with Sprint must incorporate the UNE rates approved by the Commission in the Sprint UNE Order. To the extent that the Commission determines that the rates it approved in Order No. PSC-03-0058-FOF-TP are not applicable to FDN and that new UNE rates should be developed for incorporation into the Sprint/FDN agreement, Sprint reserves the right to file new cost studies and seek a full re-evaluation of Sprint's UNE rates in this proceeding. However, it is irrelevant and inappropriate to narrowly re-examine the bases for certain findings in the Sprint UNE Order, a re-examination that has already been requested by FDN and been denied, through the discovery process in this proceeding.

**POD Nos. 1-15**

**Specific Objection:** Sprint objects to each of these PODs on the grounds that the requests are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence, to the extent that these PODs request information related to cost studies that were the subject of Docket No. 990649B-TP and were evaluated and approved, with modifications, by the Commission in Order No. PSC-03-0058-FOF-TP (the "Sprint UNE Order"). FDN was a party to that proceeding, which involved extensive discovery addressing the same information and issues that FDN is attempting to revisit in this proceeding. Through its direct testimony and these PODs, FDN improperly seeks to obtain reconsideration of the Sprint UNE Order, reconsideration that was denied by this Commission in Order No. PSC-03-0918-FOF-TP. FDN currently has an appeal of the Sprint UNE Order and the Order denying

reconsideration pending in federal court. This appeal is the appropriate place for FDN to pursue its disagreement with the Sprint UNE Order, rather than through attempting to revisit the exact same issues in this arbitration proceeding.

The issue that is currently before the Commission in this arbitration proceeding, as Sprint understands it, is whether or not FDN's new interconnection agreement with Sprint must incorporate the UNE rates approved by the Commission in the Sprint UNE Order. To the extent that the Commission determines that the rates it approved in Order No. PSC-03-0058-FOF-TP are not applicable to FDN and that new UNE rates should be developed for incorporation into the Sprint/FDN agreement, Sprint reserves the right to file new cost studies and seek a full re-evaluation of Sprint's UNE rates in this proceeding. However, it is irrelevant and inappropriate to narrowly re-examine the bases for certain findings in the Sprint UNE Order, a re-examination that has already been requested by FDN and been denied, through the discovery process in this proceeding.

DATED this 13<sup>th</sup> day of June 2005.

*Susan S. Masterton*

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ATTORNEY FOR SPRINT-FLORIDA,  
INCORPORATED



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint-Florida, Inc. for Arbitration of an Interconnection Agreement with Florida Digital Network, Inc. Pursuant to Section 252 of the Telecommunications Act of 1996

Docket No. 041464

Served: June 23, 2005

SPRINT'S RESPONSE TO FDN COMMUNICATIONS' FIRST SET OF INTERROGATORIES (NOS. 1-93) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-15)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350, and 1.280(b), Florida Rules of Civil Procedure, by and through undersigned counsel, Sprint-Florida, Incorporated (hereinafter "Sprint") hereby submits the following Responses to FDN's First Set of Interrogatories and First Request for Production of Documents, which were served on Sprint on June 3, 2005.

<u>Interrogatory</u>	<u>Prepared by</u>	<u>Title</u>
82	James M. Maples	Regulatory Affairs Manager
91	James M. Maples	Regulatory Affairs Manager
93	Peter Sywenki	Director - Regulatory Policy

INTERROGATORIES

1. Sprint states at page 8 of the "Loop Documentation" that "[r]ecent factual and objective data provides the best basis for predicting the forward-looking cost of constructing telephone plant in Sprint's service territory." State whether this "factual data" has been updated and if so, identify the new data.

Response: See Sprint's objections previously filed on June 13, 2005.

2. Provide a detailed explanation of all differences, including input values, between the version of the SLCM that Sprint bases its proposed rates on in this proceeding and the version of the SLCM filed in the previous 2001 UNE cost proceeding.

**Response:** See Sprint's objections previously filed on June 13, 2005.

3. Identify and provide the count of UNE loops that Sprint provides that are provided: a) on a standalone basis and b) as part of a UNE-P arrangement between 1996 and 2004.

**Response:** See Sprint's objections previously filed on June 13, 2005.

4. Provide all projections of the total number and/or percentage of UNE loops that Sprint expects to provide between 2004 and 2010.

**Response:** See Sprint's objections previously filed on June 13, 2005.

5. Provide the number of customers served by Sprint in Florida by year over the past five years, broken out by residential or business customers and by zone (urban, rural, and suburban).

**Response:** See Sprint's objections previously filed on June 13, 2005.

6. Provide the number of Sprint working lines in Florida by year over the past five years, broken out by residential or business customers and by zone (urban, rural, and suburban).

**Response:** See Sprint's objections previously filed on June 13, 2005.

7. Provide Sprint's average number of lines per customer in Florida by year over the past five years, broken out by zone (urban, rural, and suburban).

**Response:** See Sprint's objections previously filed on June 13, 2005.

8. Identify separately the number of residential and business Sprint lines in Florida (broken out by urban, suburban, and rural zones) that have the following number of lines per location:

- 1 line per location;
- 2 lines per location;
- Between 3 and 6 lines per location;
- Between 7 and 25 lines per location;
- Between 26 and 50 lines per location;
- Between 51 and 100 lines per location;
- Between 101 and 200 lines per location;
- Between 201 and 300 lines per location;
- Between 301 and 400 lines per location;
- Between 401 and 600 lines per location;
- 601 or more lines per location.

**Response:** See Sprint's objections previously filed on June 13, 2005.

9. Identify separately the number of residential and business Sprint lines in Florida (broken out by urban, suburban, and rural zones) that have the following number of lines per customer:

- 1 line per customer;
- 2 lines per customer;
- Between 3 and 6 lines per customer;
- Between 7 and 25 lines per customer;
- Between 26 and 50 lines per customer;
- Between 51 and 100 lines per customer;
- Between 101 and 200 lines per customer;
- Between 201 and 300 lines per customer;
- Between 301 and 400 lines per customer;
- Between 401 and 600 lines per customer;
- 601 or more lines per customer.

**Response:** See Sprint's objections previously filed on June 13, 2005.

10. Identify by wirecenter the number of DS-1 two wire copper loops in use in Sprint's Florida network in 2001, 2002, 2003 and 2004.

**Response:** See Sprint's objections previously filed on June 13, 2005.

11. Identify by wirecenter the number of DS-1 four wire fiber loops in use in Sprint's Florida network in 2001, 2002, 2003 and 2004.

**Response:** See Sprint's objections previously filed on June 13, 2005.

12. With respect to Sprint's calculation of loop costs, identify the criteria Sprint uses to determine when fiber and DLC feeder systems would be used instead of copper feeder?

**Response:** See Sprint's objections previously filed on June 13, 2005.

13. Identify the number of customers that are currently provided service with feeder cable terminating at the customer's premise and the percent that represents of all customers served.

**Response:** See Sprint's objections previously filed on June 13, 2005.

14. For modeling purposes, if copper feeder cable terminates directly in a customer premises (such as office building or MDU) and does not have any distribution cable, is the terminal in the building classified as a FDI, distribution terminal, multi-line premise termination (block terminal) or some other terminal classification? If the answer to this question varies between the different terminal types, provide a detailed explanation of when each terminal classification would be used.

**Response:** See Sprint's objections previously filed on June 13, 2005.

15. For modeling purposes, if fiber feeder cable terminates directly in a customer premises (such as office building or MDU) on either digital loop carrier or high-capacity multiplexer and then terminates on copper without any distribution cable, is the terminal in the building classified as a FDI, distribution terminal, multi-line premise termination (block terminal) or some other terminal classification? If the answer to this question varies between the different terminal types, provide a detailed explanation of when each terminal classification would be used. Identify the percentage and actual number of customers served in this manner.

**Response:** See Sprint's objections previously filed on June 13, 2005.

16. For modeling purposes, explain the extent to which the mix of copper cable length allocated to distribution and feeder estimated in the model varies based on the structure type (aerial, buried, underground), terrain, and other variables. If Sprint does not specifically track this information, provide Sprint's expert opinion on whether the mix of copper cable length allocated to distribution and feeder should vary based on the structure type (aerial, buried, underground) and identify the expert providing the response.

**Response:** See Sprint's objections previously filed on June 13, 2005.

17. For modeling purposes, explain whether the mix of copper cable length allocated to distribution and feeder varies based on customer density. If Sprint does not specifically track this information, provide Sprint's expert opinion on whether the mix of copper cable length allocated to distribution and feeder should vary based on customer density and identify the expert providing the response.

**Response:** See Sprint's objections previously filed on June 13, 2005.

18. Confirm or deny that a higher percentage of underground cable is used for feeder facilities than for distribution facilities in the model. If this statement is denied, provide a detailed explanation and give an example of when this would not be true. If Sprint does not specifically track this information, provide Sprint's expert opinion on whether a higher percentage of underground cable is used for feeder facilities than for distribution facilities and identify the expert providing the response.

**Response:** See Sprint's objections previously filed on June 13, 2005.

19. Confirm or deny that, for modeling purposes, a greater quantity of underground cable is present in urban areas than in rural areas. If this statement is denied, provide a detailed explanation and give an example of when this would not be true. If Sprint does not specifically track this information, provide Sprint's expert opinion on whether underground cable is more prevalent in urban areas than in rural areas and identify the expert providing the response. Identify the percentage and actual number of customers served in this manner.

**Response:** See Sprint's objections previously filed on June 13, 2005.

20. Page 21 of the Loop Documentation states, "Double-ending a system provides flexibility and allows the ILECs to provide unbundled loops to CLECs." Explain Sprint's position on the technical feasibility of using a single-ended or integrated DLC to provide unbundled loops.

**Response:** See Sprint's objections previously filed on June 13, 2005.

21. Identify the percent of Integrated or "single-ended" DLC-RTs in Sprint's network that have at least one shelf or channel bank assembly configured in a universal mode.

**Response:** See Sprint's objections previously filed on June 13, 2005.

22. With respect to the planned percentage of DLCs that will be deployed solely as Universal or "double-ended" DLCs in Sprint Florida's network, explain the basis for the decision regarding how much and where (and under what conditions) Universal or "double-ended" DLC will be deployed and the basis for those determinations.

**Response:** See Sprint's objections previously filed on June 13, 2005.

23. Identify the percentage of and total number of DLC installations over the past three years that have been installed solely as Universal DLCs (i.e., not integrated).

**Response:** See Sprint's objections previously filed on June 13, 2005.

24. Identify the percent and total number of loops in Sprint's existing network that are served by fiber feeder with DLC.

**Response:** See Sprint's objections previously filed on June 13, 2005.

25. Identify the percent and total number of fiber-fed loops (with DLC) in Sprint's existing network that are provisioned using Integrated DLC.

**Response:** See Sprint's objections previously filed on June 13, 2005.

26. Provide the number of DLCs and CEVs for each DLC and CEV size currently deployed in Sprint's network in Florida by zone.

**Response:** See Sprint's objections previously filed on June 13, 2005.

27. Provide the mix of CEV system sizes (including capacities) currently deployed in Sprint's network, including both the magnitude and percentage of those deployments.

**Response:** See Sprint's objections previously filed on June 13, 2005.

28. With respect to the ten largest outside plant estimate cases from Florida over the past three years, for each of these projects, provide the actual job costs at the most granular level of detail available, including the reason for each project, the total number of lines of actual and potential loop capacity added in each such project, and the specific location of each such construction project. The response to this request should contain detail information, not summary level information.

**Response:** See Sprint's objections previously filed on June 13, 2005.

29. Provide, for each of the past three years, the total labor dollars, material dollars, and engineering dollars assigned to each account category (at the lowest level of accounting available) for exempt materials. For example, if exempt material labor dollars are captured at the ACC 248 and ACC 548 level (or lower), provide information at that level of detail.

**Response:** See Sprint's objections previously filed on June 13, 2005.

30. Provide the name of and a complete description of each system and/or database that Sprint uses to develop cost estimates for outside plant construction to service new loop demand.

**Response:** See Sprint's objections previously filed on June 13, 2005.

31. Provide all Sprint "objective" installation times (or equivalent) for each component of its outside plant including those that Sprint uses to estimate installation times (either for internal reporting purposes or for constructing project estimates) for each specific type of outside plant equipment including, but not limited to, any installation times that Sprint uses to evaluate the performance of its employees.

**Response:** See Sprint's objections previously filed on June 13, 2005.

32. Identify the average distance between splices for aerial, buried, and underground copper cable in Sprint's network and the assumptions used in the SLCM. If Sprint does not specifically track this information, provide Sprint's expert opinion on the average distance

between splices for aerial, buried, and underground copper cable and identify the expert providing the response.

**Response:** See Sprint's objections previously filed on June 13, 2005.

33. Describe the specific steps that are necessary to install DLC equipment once it is delivered from the vendor. Also, include time estimates for each of these steps and identify the source for these time estimates.

**Response:** See Sprint's objections previously filed on June 13, 2005.

34. Identify the various sizes of distribution terminals that Sprint currently purchases for use in Florida and the extent to which they are (a) deployed in Sprint's network and (b) assumptions regarding deployment in the SLCM.

**Response:** See Sprint's objections previously filed on June 13, 2005.

35. For each size distribution terminal identified that Sprint currently purchases for use in Florida, identify the percent of each distribution terminal type installed over the past three years.

**Response:** See Sprint's objections previously filed on June 13, 2005.

36. For each FDI placed in the past three years, supply the size FDI placed, the number of working lines at installation and the total number of ports cross-connected at that FDI. If the number of ports cross-connected is not available, provide as much information as is available for each FDI installation.

**Response:** See Sprint's objections previously filed on June 13, 2005.

37. Identify the average number of feeder pairs engineered at the FDI, by rate zone and customer type.

**Response:** See Sprint's objections previously filed on June 13, 2005.

38. Identify the installation times for each FDI size that Sprint uses, for each system that Sprint uses that contains such information, including, but not limited to systems used for



estimating construction costs, budget control, or purchasing purposes and identify the systems containing such information.

**Response:** See Sprint's objections previously filed on June 13, 2005.

39. Identify the average feeder stub length assumed in SLCM.

**Response:** See Sprint's objections previously filed on June 13, 2005.

40. Identify and indicate the length of drop wires assumed to be used for aerial and buried drops in the SLCM. Provide all documentation, assumptions, studies, work papers and any other support for the assumed lengths. If no specific drop length is assumed, explain if Sprint's position in this proceeding is that drop costs do not vary based on length.

**Response:** See Sprint's objections previously filed on June 13, 2005.

41. Identify the average lengths of drop wire installed by Sprint-Florida at both a statewide level and by rate zone.

**Response:** See Sprint's objections previously filed on June 13, 2005.

42. Confirm or deny that the mix of aerial and buried drop wires should match the mix of aerial and buried distribution cables. If this statement is denied, state the basis for your position.

**Response:** See Sprint's objections previously filed on June 13, 2005.

43. If a customer requests a buried drop (where an aerial drop would have been done otherwise), to what extent is the customer required to pay for that buried drop, and does this include trenching costs?

**Response:** See Sprint's objections previously filed on June 13, 2005.

44. Identify the various sizes of Network Interface Devices ("NIDs") that Sprint currently purchases for use in Florida. For each size NID, identify the percent of each NID type installed over the past three years.

**Response:** See Sprint's objections previously filed on June 13, 2005.

45. Identify the NID cost estimates, by NID type, used in Sprint's cost model.

**Response:** See Sprint's objections previously filed on June 13, 2005.

46. Identify the NID installation times used in Sprint's cost model, including the bases therefore.

**Response:** See Sprint's objections previously filed on June 13, 2005.

47. Identify any standards (such as standard time increments or functional time increments) that Sprint uses for the purposes of evaluating the productivity of its technicians for installing NIDs and identify the source of the standards.

**Response:** See Sprint's objections previously filed on June 13, 2005.

48. Identify Sprint's costs associated with purchasing drop wire (both aerial and buried) and NIDs along with any information sufficient to identify the average material cost per foot of aerial drop wire, buried drop wire, and the average material cost per NID from these invoices.

**Response:** See Sprint's objections previously filed on June 13, 2005.

49. For the ten largest Sprint projects over the past three years involving the installation of DS-1 circuit equipment, identify the specific time and material, on an item-by-item basis, associated with installing DS-1 circuit equipment. Include a description of the purpose or reason for the job. For each of these projects, also provide the actual job costs at the most granular level of detail available.

**Response:** See Sprint's objections previously filed on June 13, 2005.

50. For any DLC systems used in SLCM, identify the concentration ratio and the basis for that estimate.

**Response:** See Sprint's objections previously filed on June 13, 2005.

51. By each rate zone, identify the actual concentration ratio for which Sprint's DLC systems are engineered in its actual network in Florida.

**Response:** See Sprint's objections previously filed on June 13, 2005.

52. Please discuss Sprint's position of whether IDLC based DS0 loops can be offered on an unbundled basis as UNE loops.

**Response:** See Sprint's objections previously filed on June 13, 2005.

53. Please identify the following:

- a. the percentage of loops served by IDLC;
- b. the percentage of loops served by UDLC.

**Response:** See Sprint's objections previously filed on June 13, 2005.

54. Is the Sprint Florida TELRIC model platform filed in this proceeding the same as that filed in Docket No. 990649B-TP? If not, please describe in detail how this model platform is different than the one used to calculate the following in Docket No. 990649B-TP;

- a. Loop investment and annual costs.
- b. Annual cost factors
- c. Other direct and common cost factors
- d. Avoided / excluded costs

**Response:** See Sprint's objections previously filed on June 13, 2005.

### Factors

55. Is Sprint proposing cost of debt, cost of equity and debt / equity ratios different than those approved by the Florida PSC in Order No. PSC-03-0058-FOF-TP? If the answer is yes, please identify the bases for the proposed changes.

**Response:** See Sprint's objections previously filed on June 13, 2005.

56. Is Sprint proposing depreciation lives different than those approved by the Florida PSC in Order No. PSC-03-0058-FOF-TP? If the answer is yes, please explain why and the basis for Sprint's proposed changes.

**Response:** See Sprint's objections previously filed on June 13, 2005.

57. Please state whether Sprint used book values for the plant investment used in the denominator portion of the annual cost factor calculations or plant values restated to replacement cost via telephone plant indices ("TPP") or C.A. Turner indices.

**Response:** See Sprint's objections previously filed on June 13, 2005.

58. Please state whether Sprint Florida includes productivity and/or inflation factors in its TELRIC studies.

**Response:** See Sprint's objections previously filed on June 13, 2005.

59. With respect to the "Non Recurring Charges Study, Narrative Index," at p. 4 § 2, Service Order Charges:

- a. state what automatic edits, if any, the Electronic Interfaces, Electronic Data Interface (EDI) and Integrated Request Entry System (IRES) have for correcting input by CLEC users?
- b. identify the devices available in the Electronic Interfaces to CLEC users to determine the type and accuracy of input information?
- c. identify the user feedback processes available for CLEC users to determine what ongoing errors are being charged as a tool to avoid future charges for errors.

**Response:** See Sprint's objections previously filed on June 13, 2005.

60. With respect to the "Non Recurring Charges Study, Narrative Index," at pps. 5-6 § 2, ("Major Determinants of Cost"), where Sprint states that the electronic service order charge "includes the costs to clarify and correct errors on LSR," identify:

- a. How is the error determination made and how does Sprint make the CLEC user aware of all errors on LSRs?

- b. What is the time frame from Sprint receipt of an LSR to notification of the CLEC users that a billable error has been made?

**Response:** See Sprint's objections previously filed on June 13, 2005.

61. With respect to the "Non Recurring Charges Study, Narrative Index," at pps. 5-6 § 2, ("Major Determinants of Cost"), in which Sprint states that the Electronic Service Order charges includes the costs to establish major account for CLEC in SOE, identify the steps involved with this business process and explain why this is a manual rather than automated process.

**Response:** See Sprint's objections previously filed on June 13, 2005.

62. With respect to the "Non Recurring Charges Study, Narrative Index," at pps. 5-6 § 2, ("Major Determinants of Cost"), in which Sprint states that the Electronic Service Order charge includes the costs to "Apply service and equipment codes," and charges associated with CLEC orders, explain:

- a. The steps and purpose of these business processes;
- b. why they are not automated for cost purposes; and
- c. Whether these codes are maintained in any system data bases.

**Response:** See Sprint's objections previously filed on June 13, 2005.

63. Identify the percentage of central office dedicated inside plant (DIP) assumed in the cost studies, if any, and the process used to make this determination.

**Response:** See Sprint's objections previously filed on June 13, 2005.

64. Identify the percentage of dedicated outside plant (DOP) assumed in the cost studies, if any, and the process used to make this determination.

**Response:** See Sprint's objections previously filed on June 13, 2005.

65. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops)" at p. 8 § 3, in which Sprint states that

various charges are "weighted," identify the processes Sprint uses to determine the various non recurring charges that are weighted.

**Response:** See Sprint's objections previously filed on June 13, 2005.

66. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops)" at p. 8, Sprint states that "[r]ecent factual and objective data provides the best basis for predicting the forward-looking cost of constructing telephone plant in Sprint's service territory." Identify any updates that have been made to this data.

**Response:** See Sprint's objections previously filed on June 13, 2005.

67. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops - Installation Charges)," at pps. 10-11, § 3, in which Sprint states that for New, Second or Additional Line and Re-Installation, charges include the cost of "Connections at cross-boxes, terminals and customer interface," identify the basis for these costs, including whether they constitute averages for all types of termination technology?

**Response:** See Sprint's objections previously filed on June 13, 2005.

68. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops), at pps. 10-11, § 3, identify the bases for all travel charges.

**Response:** See Sprint's objections previously filed on June 13, 2005.

69. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops), at pps. 10-11, § 3, in which Sprint states that for New, Second or Additional Line and Re-Installation, charges include the costs of "Completion Testing," state what activities constitute this charge, including, but not limited to, whether the process is automated, and how fault-identifications are handled and resolved.

**Response:** See Sprint's objections previously filed on June 13, 2005.

70. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops), at p. 11, § 3, regarding disconnect charges,

identify all activities associated with this charge and when relative to the disconnect due date, service jumpers removed and all tasks associated therewith.

**Response:** See Sprint's objections previously filed on June 13, 2005.

71. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops), § 4 at 12, in which Sprint identifies activities associated with loop qualification information request procedures, identify the What measured sub-tasks associated with each identified component of the major task and how those estimates were determined.

**Response:** See Sprint's objections previously filed on June 13, 2005.

72. With respect to the "Non Recurring Charges Study, Narrative Index (Major Determinants of Cost - 2 & 4 Wire Analog Loops), § 5 pps. 13-15, regarding loop conditioning inputs, identify all activities and processes associated with these charges and the bases therefore.

**Response:** See Sprint's objections previously filed on June 13, 2005.

73. Identify any and all databases and/or operational support systems that provide detailed information on outside plant design, rearrangements, additions, removals and other activity relative to the design and makeup characteristics needed to provision customer services?

**Response:** See Sprint's objections previously filed on June 13, 2005.

74. State whether Sprint field technicians (installation and maintenance, cable maintenance, central office maintenance, etc.) are dispatched from personal residences; if not, the locations they are dispatched from, and the criteria Sprint uses to determine dispatch locations.

**Response:** See Sprint's objections previously filed on June 13, 2005.

75. Identify how labor rate information is utilized in the cost studies and how cost data is adjusted to reflect current labor costs.

**Response:** See Sprint's objections previously filed on June 13, 2005.

76. Identify by name and position all subject matter experts, field technicians and other personnel that have provided information used in the non-recurring studies filed in the current proceeding and identify with specific references to studies each specific time estimate or others aspect of the studies for which the person provided input(s).

Response: See Sprint's objections previously filed on June 13, 2005.

77. List all criteria applied to the nonrecurring cost studies to insure statistical validity.

Response: See Sprint's objections previously filed on June 13, 2005.

78. State whether central office and field technicians have the ability to receive and complete work orders directly from an operation support system, what system or systems support this effort, and the nature of the support these systems provide field technicians.

Response: See Sprint's objections previously filed on June 13, 2005.

79. For each in which a Sprint incumbent local exchange carrier affiliate (other than Sprint Florida) provides unbundled network elements, identify whether the most recently approved NRCs include the costs for disconnection or whether there are deferred charges for disconnection.

Response: See Sprint's objections previously filed on June 13, 2005.

80. Identify the main distribution frame technologies Sprint uses to determine central office cross-connect times and the bases therefore.

Response: See Sprint's objections previously filed on June 13, 2005.

81. Identify the extent Sprint utilizes automatic distribution frame technologies? What percentage of Sprint's voice grade, DS0 level loop facilities terminate on such frames in Florida?

Response: See Sprint's objections previously filed on June 13, 2005.



82. For commingled EELs where the loop is a UNE and transport is purchased from other Sprint tariffs, what non-recurring charges apply? Please provide an exhaustive accounting of the applicable non-recurring charges for the following configurations:

- a. DS0 loop to DS1 transport
- b. DS0 loop to DS3 transport
- c. DS1 loop to DS1 transport
- d. DS1 loop to DS3 transport

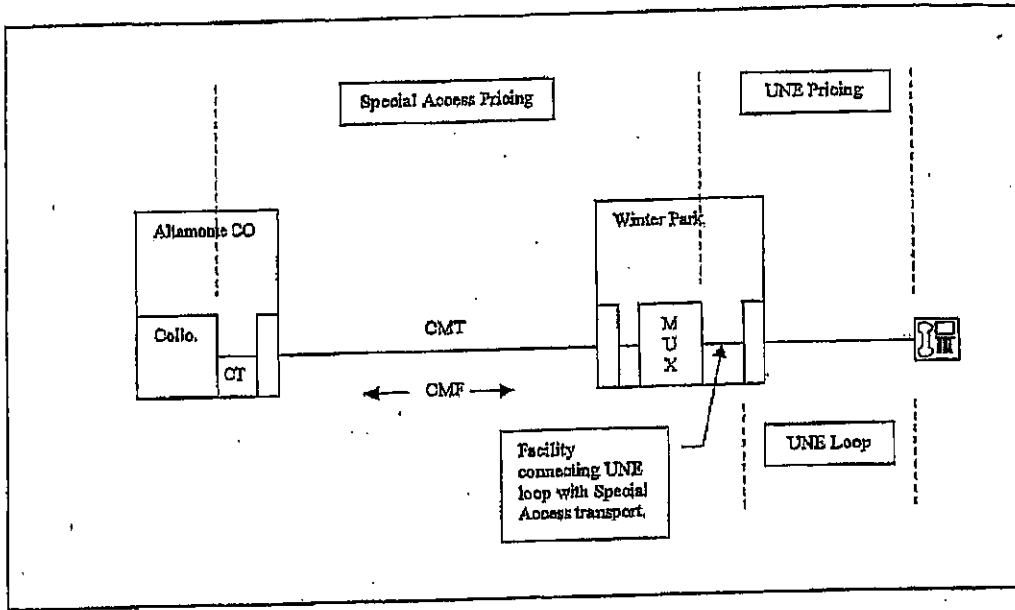
**Response:**

The following response is based on the initial installation of new services. FDN did not specify whether or not it wanted the charges for a new installation or the conversion of existing service.

The tariffed special access recurring and non-recurring charges will apply for the transport component of the commingled EEL. Sprint's tariffs are publicly available, rate application is explained within them, and prices vary based on a variety of factors such as whether or not the circuit is ordered out of the interstate or intrastate tariff and whether or not it is ordered on a month to month or volume term basis. Any attempt to model the variety of scenarios would therefore be voluminous and burdensome and unnecessary.

Likewise, pricing for the UNE loop components is clearly provided in the price list and varies based on loop type and by rate bands.

However, Sprint provides the following example that can assist FDN in modeling various scenarios. The diagram illustrates a commingled EEL with the special access transport between Altamonte and Winter Park and the UNE loop served out of Winter Park. It terminates to a collocation arrangement in Altamonte since collocation is a requirement for access to EELs (47 C.F.R. §51.318).



The special access elements that could apply (depending upon what was ordered) and associated month to month access rates are as follows:

Service	Rate Element	Quantity	Intrastate Zone 1 Non-recurring Charge	Interstate Zone 1 Non-recurring Charge
DS1	Channel Termination (CT)	1	360.00	180.00
DS1	Channel Mileage Facility (CMF)	6	NA	NA
DS1	Channel Mileage Termination (CMT)	1	NA	NA
DS1	DS1 to DS0 Mux	1	175.00	150.00
DS3	Channel Termination (CT)	1	400.00	200.00
DS3	Channel Mileage Facility (CMF)	6	NA	NA
DS3	Channel Mileage Termination (CMT)	1	NA	NA
DS3	DS3 to DS1 Mux	1	212.00	100.00

The most common UNE elements that could apply (depending upon what was ordered and how it was ordered) are as follows:

UNE Rate Element	Non-Recurring Charge
Trip Charge	18.88
Manual Service Order	28.10
Electronic Service Order	3.82

2 Wire Loop Cooperative Testing	46.71
4 Wire Loop Cooperative Testing	66.99
Loop Make-UP Information	5.90
2-Wire Analog	111.24 (First line) 52.73 (Each additional)
4-Wire Analog Band 2	144.33 (First line) 85.82 (Each additional)
2-Wire xDSL Capable	106.81 (First line) 48.30 (Each additional)
4-Wire xDSL Capable	138.23 (First line) 79.75 (Each additional)
2-Wire Digital	169.14 (First line) 108.10 (Each additional)
2-Wire ISDN-BRI Digital Loop	169.14 (First line) 108.10 (Each additional)
4-Wire Digital Loop (no Electronics)	240.90 (First line) 179.85 (Each additional)
Digital 56k/64k Loop Band 2	169.14 (First line) 108.10 (Each additional)
DS1 Service and ISDN PRI Loop	325.88 (First line) 177.61 (Each additional)
Loop Conditioning	May apply if CLEC requests (see UNE price list)

There is no charge currently for the facility connecting the UNE loop with the special access transport. Sprint initially took the position that this facility would be purchased from the wholesale tariff; however, upon further review, it determined that a UNE rate would be more appropriate. If the end to end circuit were 100% special access the channel termination charge for the facility to the end user premises would recover the cost of providing this connection. If the end to end circuit were 100% UNE the UNE multiplexing charge includes the cost of this facility.

Sprint will commingle the facilities with the non-recurring charges as shown and forego any separate charge for the facility in question. Sprint, may, at some future time, develop pricing for that element. If it does, it will only seek to apply the rate on a prospective basis in accordance with the terms and conditions in the interconnection agreement.

Using the information above, if FDN were to order a DS1 UNE loop commingled with intrastate DS3 special access transport, the following NRCs would apply, assuming that the UNE loop was ordered electronically, a trip charge was required, and FDN requested cooperative testing.

Rate Element	NRC
DS3 Channel Termination (CT)	400.00
DS3 Channel Mileage Facility (CMF)	NA
DS3 Channel Mileage Termination (CMT)	NA
DS3 to DS1 Mux	212.00
Trip Charge	18.88
Electronic Service Order	3.82

4-Wire Cooperative Testing	66.99
DS1 UNE Loop Installation	325.88
Total NRC	1,027.57

This level of non-recurring charge would apply to the initial installation of the DS3 transport and DS3/DS1 multiplexing. The installation of subsequent DS1 loops terminated to the special access multiplexer would be \$415.57 (trip charge, electronic service order, 4-wire cooperative testing, DS1 UNE Loop Installation).

83. State how Sprint accounts for exempt material dollars and how exempt material dollars are associated with each account.

Response: See Sprint's objections previously filed on June 13, 2005.

84. Identify and provide the bases for all modeling assumptions regarding the average distance between splices for aerial, buried, and underground copper cable.

Response: See Sprint's objections previously filed on June 13, 2005.

85. Identify and provide the bases for all modeling assumptions regarding the estimation of the percent of active strands assumption in SLCM, by density zone.

Response: See Sprint's objections previously filed on June 13, 2005.

86. Identify and provide the bases for all modeling assumptions used to generate FDI size, quantity, and zone allocations.

Response: See Sprint's objections previously filed on June 13, 2005.

87. Identify and provide the basis for the average feeder stub length assumed in SLCM.

Response: See Sprint's objections previously filed on June 13, 2005.

88. Identify and provide the basis for the mix of aerial and buried drop-wires assumed in the SLCM. To the extent that the mix is based on expert opinion, identify the expert and

provide a detailed description of why the mix of aerial and buried drop wires used in Sprint's SLCM is appropriate.

**Response:** See Sprint's objections previously filed on June 13, 2005.

89. Identify and provide the basis for the business and residential premises termination information (mix of NIDs/block terminals, etc.), used in Sprint's model.

**Response:** See Sprint's objections previously filed on June 13, 2005.

90. Identify and provide the basis for the cable distances assumed in SLCM and explain how Sprint assures they reflect only those distances that would be necessary to support the services assumed on each route.

**Response:** See Sprint's objections previously filed on June 13, 2005.

91. Identify on a route-by-route basis, the number of UNE transport circuits purchased by FDN from Sprint (whether as part of an EEL or otherwise) on routes which Sprint maintains are unimpaired pursuant to the standards of the TRRO and on routes where Sprint maintains that a CLBC can order no more than 10 DS-1 transport circuits.

**Response:**

Sprint provided FDN with the list of Sprint's wire centers that qualify as Tier 1 or Tier 2 via e-mail on April 28, 2005 and provided FDN the basis for the wire centers meeting the qualification, either number of business lines or fiber based collocators, on May 27, 2005. In addition, the point to point transport route table in the price list that has been provided to FDN explicitly shows which routes have met the DS1 and/or DS3 threshold. Accordingly, the prices for these routes on the price list have been adjusted to reflect the increase allowed by the FCC in the TRRO.

FDN should maintain its own records regarding how many circuits it has as well as where they are and with the above information be able to determine which circuits will be impacted by the status of the wire centers as well as the cap of 10 DS1 circuits on each route.

92. Identify the total amount of intrastate access revenues and minutes billed by Sprint to FDN for services in 2004.

**Response:** In addition to Sprint's general objections previously filed on June 13, 2005, Sprint objects to this interrogatory because the information requested is information that is equally available to FDN as it is to Sprint and, via its receipt of Sprint's bills, should already be in FDN's possession.

93. Identify the total amount of intrastate access revenues and minutes budgeted by Sprint for services to be rendered to FDN for 2005, 2006, and 2007.

**Response:**

Sprint does not budget intrastate access revenues and minutes on a carrier by carrier basis.

### REQUESTS FOR PRODUCTION

1. Provide the proprietary versions of Sprints cost models used to support Sprint's proposed rates and costs in the current proceeding. The models and algorithms should be provided in electronic form with all supporting workbooks and all documentation necessary to replicate and verify the results. Sprint should also provide all other documents, communications, work papers and analyses used in the preparation of the non-recurring cost studies.

**Response:** See Sprint's objections previously filed on June 13, 2005.

2. Provide all documents referred to, relied upon or related to Sprint's answers to FDN's First Set of Interrogatories.

**Response:** See Sprint's objections previously filed on June 13, 2005.

3. Sprint states at page 5 of the Loop Documentation manual that "Customer density is the single largest factor impacting the cost of local loops." Provide all studies, analysis and maps showing any and all changes in Sprint's customer density over the last five years by wire center.

**Response:** See Sprint's objections previously filed on June 13, 2005.

4. Sprint states at page 7 of the Loop Documentation manual that it "uses current vendor material costs for cable and electronics." Provide all current vendor quotes relied on the inputs to the Loop calculations.

**Response:** See Sprint's objections previously filed on June 13, 2005.

5. With respect to Sprint's calculation of loop costs, provide all documents related to Sprint's determination of when fiber and DLC feeder systems are used instead of copper feeder, including all supporting analysis and related documentation.

**Response:** See Sprint's objections previously filed on June 13, 2005.

6. Provide all documentation supporting the percentage of Universal or "double-ended" DLC used in SLCM.

**Response:** See Sprint's objections previously filed on June 13, 2005.

7. Provide a complete copy of any documentation that establishes the planned percentage of DLCs that will be deployed solely as Universal or "double-ended" DLCs in Sprint Florida's network, including the basis for the decision regarding how much, where, and under what conditions, Universal or "double-ended" DLC will be deployed.

**Response:** See Sprint's objections previously filed on June 13, 2005.

8. For the ten largest outside plant construction projects done in the last three years, provide all pre-job cost estimates, and post-job actual cost data, including invoices and other documentation as well as statements of work performed, time required, and costs of each activity, at the most granular level of detail available, for the following: (a) installation of feeder and distribution cable, (b) installation of DLC RT Cabinet equipment; (c) 672 and 2016 DLC-RT installation; (d) DLC COT deployment; (e) terminal block and distribution terminal installation and deployment; and (f) FDI installation.

**Response:** See Sprint's objections previously filed on June 13, 2005.

9. Provide copies of any standards, such as standard time increments or functional time increments, for all activities related to elements in the cost models, including, but not limited to, the following: (a) installation of copper and fiber cables; (b) installation of distribution terminals and FDIs. Also identify the basis for all such standards.

**Response:** See Sprint's objections previously filed on June 13, 2005.

10. Provide an electronic copy of all documents concerning, referring or relating to any and all internal or external validation tests or studies that have been performed on SLCM.

**Response:** See Sprint's objections previously filed on June 13, 2005.

11. Page 29 of the Loop Documentation manual states, "The maximum loop length of a CSA is 12kft for 19, 22, or 24 gauge cables and 9kft for 26 gauge cables. All CSA loops must be unloaded and should not consist of more than two gauges of cable." This documentation cites Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997, Section 12.1.4 page 12-5. Provide all updated engineering guidelines and resulting current maximum loop length practices.

**Response:** See Sprint's objections previously filed on June 13, 2005.

12. Please provide copies of the most current TPI or C.A. Turner indices used by Sprint Florida and an analysis of plant investment by account and by vintage restated to current or replacement cost.

**Response:** See Sprint's objections previously filed on June 13, 2005.

13. Provide copies of the instructions used in preparing cost studies relied on by for the NRCs in Sprint Florida.

Response: See Sprint's objections previously filed on June 13, 2005.

14. Provide copies of all time and motion studies used to develop Sprint-Florida cost studies.

Response: See Sprint's objections previously filed on June 13, 2005.

15. Provide all engineering documents and guidelines used by Sprint's engineers and technicians in planning, constructing and or augmenting Sprint's loop and transport facilities and network.

Response: See Sprint's objections previously filed on June 13, 2005.

DATED this 23<sup>rd</sup> day of June, 2005.

*Susan S. Masterton / (SM)*

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