

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: February 26, 2010
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Kiwanis L. Curry, Regulatory Analyst II, Division of Regulatory Analysis *KLC*
RE: Docket No. 090444-TX- Application for certificate to provide competitive local exchange telecommunications service by Crystal Link Communications, Inc.

Please add the attached letter to the docket file.

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01318 FEB 26 2010
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Douglas C. Nelson
Counsel, State Regulatory Affairs

Sprint Nextel
233 Peachtree St., N.E., Suite 2200
Atlanta, GA 30303

February 26, 2010

Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket 090444; Application for certificate to provide competitive local exchange telecommunications service by Crystal Link Communications, Inc.

Dear Ms. Earnhardt:

Sprint Communications Company, Limited Partnership d/b/a Sprint ("Sprint"), a certificated interexchange carrier operating in Florida (Company Code TI793), shares the concerns raised by AT&T in its January 27, 2010 letter concerning the above-captioned application for certificate to provide competitive local exchange telecommunications service filed by Crystal Link Communications, Inc. ("Crystal Link"). Crystal Link's application should be thoroughly examined, particularly with regard to ensuring disclosure and consideration of any prior activities undertaken by its principals to engage in "churning" operations through entities such as International Telnet that are no longer certificated in Florida.

Generally, such "churning" operations involve competitive local exchange carriers ("CLECs") engaging in suspect business practices that prevent interexchange carriers from collecting valid dial-around calling charges. In one variation of "churning" the CLEC procures a bank of local lines from the incumbent local exchange carrier on a wholesale basis and permits its "customers" to make dial-around toll calls, particularly expensive international calls, for a fee. Then the CLEC disconnects the lines or orders new telephone numbers so the dial-around call charges cannot be billed to the CLEC or collected upon. By switching local telephone numbers, local lines and locations and using different dial around codes, the CLEC often can continue the practice over an extended period.

Office: (404) 649-8983 Fax: (404) 649-8980

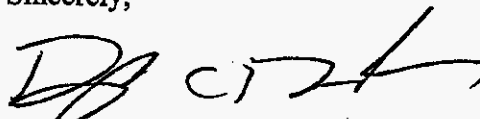
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Thank you for your attention to this matter and please to not hesitate to contact me with questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. C. Nelson', written in a cursive style.

Douglas C. Nelson