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**VIA AIRBORNE**

January 24, 1996

**ORIGINAL  
FILE COPY**

Ms. Blanca S. Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

In Re: Resolution of Petition(s) to Establish Nondiscriminatory Rates, Terms and Conditions for Interconnection Involving Local Exchange Companies and Alternative Local Exchange Companies Pursuant to Section 364.162, Florida Statutes; Docket no. 950985-TP.

Dear Ms. Bayó:

Please find enclosed for filing, the original and 16 copies of Post Hearing Brief and Post Hearing Statement of Issues and Positions on behalf of Sprint Communications Company Limited Partnership in the above captioned proceeding. All parties of record have been served in accordance with the attached Certificate of Service. Please date stamp the additional copy and return to me in the enclosed self addressed stamped envelope.

Thank you in advance for your cooperation.

Sincerely,

*Benjamin W. Fincher*  
Benjamin W. Fincher  
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- AFA \_\_\_\_\_
- APP \_\_\_\_\_
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- CTR \_\_\_\_\_
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- LIN 5
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- SEC 1 cc: All Parties of Record
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing brief on behalf of Sprint Communications Company Limited Partnership via United States mail postage paid and properly addressed to the following:

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This 24 day of January, 1996.

  
\_\_\_\_\_  
Amy Cupp  
Sprint Communications Company  
Limited Partnership

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms, and conditions ) DOCKET NO. 950985-TP  
for interconnection involving local exchange )  
companies and alternative local exchange ) Filed January 25, 1996  
companies pursuant to Section 364.162, F.S. )

POST-HEARING BRIEF OF  
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel and pursuant to Commission Rule 25-22.056(3)(a), Florida Administrative Code, files its post-hearing brief of the evidence in the above referenced proceeding.

Issue 1: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between the respective ALECs and Southern Bell?

ARGUMENT

The compensation arrangements for exchange of local and toll traffic between the ALECs and Southern Bell should be reasonable with no excessive contributions to shared costs. If development of competition is to occur in Florida, the level of compensation is critical. As pointed out by MCI Metro witness Cornell, (Tr. page 395) development of effective competition should be an overriding goal. Entry is not the same as effective competition. Mutual traffic exchange is the best way to foster effective competition because it does not create artificial barriers to entry that would add to the natural barriers that already exist. Further, mutual traffic exchange satisfies three vital requirements for interconnection to be able to foster effective competition. It is reciprocal, it fosters efficiency more than any other form of interconnection arrangements and it is neutral with respect to technology and architecture chosen by incumbents and ALECs. (Cornell, Tr. pages 396-397.)

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Moreover, the level of rates should not mirror existing access charge levels. Access charges include significant amounts of contribution to local service costs. If contribution is applied to local interconnection rates, one local competitor would be subsidizing another local competitor. The net effect would be a price squeeze and artificial barriers to entry. This would not be in the public interest. (Cornell, Tr. pages 397-398)

Issue 2: If the Commission sets rates, terms, and conditions for interconnection between the respective ALECs and Southern Bell, should Southern Bell tariff the interconnection rate(s) or other arrangements?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 3: What are the appropriate technical and financial arrangements which should govern interconnection between the respective ALECs and Southern Bell for the delivery of calls originated and/or terminated from carriers not directly connected to the respective ALEC's network?

#### ARGUMENT

Southern Bell has already agreed to provide the intermediary function to ALECs who have signed the Stipulation. (Witness Scheye-Southern Bell, Tr. page 555) Witness Scheye admitted that there was no technical reason why this type of intermediary function cannot be provided. (Scheye, Tr. page 555) Accordingly, Sprint would suggest that the Commission establish a general framework to govern the technical and financial arrangements with the understanding that the carriers can negotiate their own arrangements.

Issue 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the respective ALEC's customer and terminates to an 800 number served by or through Southern Bell?

Sprint has no additional argument beyond its Post-Hearing Statement of Position.

Issue 5a: What are the appropriate technical arrangements for the interconnection of the respective ALECs' network to Southern Bell's 911 provisioning network such that the respective ALECs' customers are ensured the same level of all service as they would receive as a customer of Southern Bell?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 5b: What procedures should be in place for the timely exchange and updating of the respective ALECs' customer information for inclusion in appropriate E911 databases?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and Southern Bell including busy line verification and emergency interrupt services?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Southern Bell?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 8: Under what terms and conditions should Southern Bell be required to list the respective ALECs' customers in its white and yellow pages directories and to publish and distribute these directories to the respective ALECs' customers?

Sprint has no argument beyond its Post-Hearing Statement of Position.

Issue 9: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and Southern Bell, including billing and clearing credit card, collect, third party and audiotext calls?

Sprint has no additional argument beyond its Post-Hearing Statement of Position.

Issue 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Southern Bell's networks?  
Sprint has no additional argument beyond its Post-Hearing Statement of Position.

Issue 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and Southern Bell, including trunking and signaling arrangements?

#### ARGUMENT

Physical interconnection, including trunking and signaling, should be provided at the access tandem, end office, or some common meet point. As pointed out by MCI Metro witness Price, BellSouth has for years interconnected with independent LECs on what is called a "mid-span" or "meet point" basis. This simply means that the interconnecting carriers have agreed to terminate trunks between their respective switches and to cooperate in the construction and operation of those trunk facilities. (Price, Tr. pages 323-324) ALECs should also be able to interconnect in the same manner.

Issue 12: To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to the respective ALECs?

#### ARGUMENT

As stated in Sprint's Statement of Position, number portability will be addressed in Docket No. 950737-TP. However, Sprint agrees with MCI-Metro witness Cornell in that remote call forwarding is an inferior form of number portability. There are a number of things that cannot be done with remote call forwarding. In addition, remote call forwarding can cause problems with service quality. A databased solution is far superior to remote call forwarding and should be implemented as soon as technically possible. Trials are being conducted and it is simply a matter of time. (Cornell, Tr. pages 410-411)



Issue 13: What arrangements, if any, are necessary to address other operational issues?

Sprint has no other issues to address at this time.

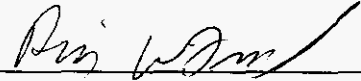
Issue 14: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?

ARGUMENT

ALECs must have access to NXX codes on a nondiscriminatory basis until such time as a neutral number administrator replaces BellSouth in the administration of NXX codes in Florida. (Price-MCI Metro-Tr. pages 322-323)

Respectfully submitted,

Sprint Communications Company Limited Partnership

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