

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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 STATEMENT OF ISSUES AND POSITIONS 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), Florida Administrative Code, hereby submits its Post-Hearing Statement of Issues and Positions in the above-captioned docket.

I. BASIC POSITION

* Sprint's Basic Position: Sprint believes that the exchange of local traffic between Southern Bell and ALECs should be based upon mutual compensation to co-carriers for call termination under arrangements and levels that encourage development of competition while covering associated costs.

II. ISSUES AND SPRINT'S POSITIONS

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?

* Sprint's Position: Sprint believes that rates for call termination should be established on a reasonable basis with no excessive contributions to shared costs. Mutual compensation for call termination should be established at a level that will encourage the development of competition and interconnection while covering the associated costs. Compensation should be economically viable; administratively efficient and minimize carrier conflicts; create incentives for competitive infrastructure development; minimize competitive distortions; not be a source of universal service subsidy; promote competitive innovation; and not mirror existing access charge levels.

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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 rates(s) or other arrangements?

* **Sprint's Position:** Yes. Sprint believes that Southern Bell should tariff the interconnection rate(s) or other arrangements as may be established by the Commission.

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?

* **Sprint's Position:** The technical and financial arrangements governing interconnection should be reasonable and should reflect the actual costs involved in transporting the local call. For example, Southern Bell and the terminating ALEC should not charge duplicate interconnection rate elements unless costs were incurred to support the charging of these elements. The Commission should establish a general framework with the parties free to negotiate other arrangements.

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

* **Sprint's Position:** In originating an 800 call, the ALEC must determine where to send the call through querying an 800 database. If Southern Bell is the route for the call, the originating ALEC should transmit the call to Southern Bell with call detail information. Southern Bell can then bill its 800 customer. Southern Bell should pay the originating ALEC the 800 originating access charges with 800 database query charge.

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's Position: Sprint believes that ALECs should have access to 911 services provided by the incumbent local telephone company on the same terms and conditions as enjoyed by the incumbent local telephone company.

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's Position: Sprint believes that ALECs should have access to 911 services provided by the incumbent local telephone company on the same terms and conditions as enjoyed by the incumbent local telephone company. Procedures should be established to ensure that the ALEC customer information is updated as promptly as that of the incumbent LEC.

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's Position: ALECs should be afforded co-carrier status such that operator handled traffic is provided in the same manner as current operator handled traffic is provisioned between LECs today. Conceptually, ALECs are independent LECs that are being implemented to overlay existing LEC territory. Therefore, procedures used today to provision an independent LEC should be used in connection with ALECs.

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

* Sprint's Position: ALECs should be afforded co-carrier status such that operator handled traffic is provided in the identical manner that current operator handled traffic is provisioned between LECs today. Conceptually, ALECs are independent LECs that are being implemented to overlay existing LEC territory. Therefore, procedures used

today to provision an independent LEC should be used in connection with ALECs. Southern Bell should include in its Directory Assistance Database directory information concerning ALEC customers.

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's Position: ALECs should be allowed to have their customer's telephone numbers included in telephone directories, directory assistance, LICB, AIN, 800, 700 and other databases and have access to such resources equal in price, functionality and quality as do incumbent local telephone service providers.

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's Position: ALECs should be treated same as other LECs with respect to provisioning of billing and collection services.

Issue 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Southern Bell's networks?

* Sprint's Position: The provision of CLASS features will require the unbundling and interconnection of the SS7 signaling network. Southern Bell and the ALECs should cooperate in linking the SS7 arrangements and protocols to ensure total interoperability of CLASS/LASS features between their respective networks.

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

* Sprint's Position: Local interconnection, which includes trunking and signaling, should be provided at the access tandem, end office level, or some common meet point.

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?

* Sprint's Position: Number portability issues will be addressed in Docket No. 950737-TP.

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

* Sprint's Position: 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?

* Sprint's Position: Numbering policy must be broadly developed and administered in a competitively neutral manner. The LEC must not be able to control the administration and assignment of numbering resources. NXX assignments must be handled in a neutral and nondiscriminatory manner.

Respectfully submitted,

Sprint Communications Company Limited Partnership

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