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January 20, 1998

VIA FED EX

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

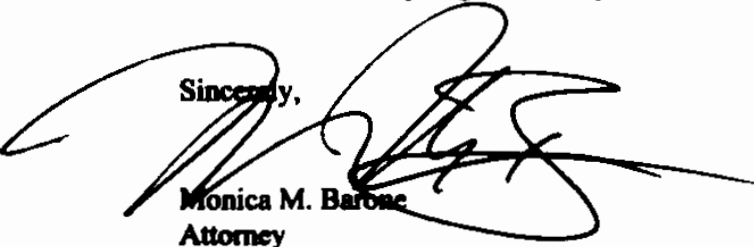
In Re: Docket No. [REDACTED]

Dear Ms. Bayó:

Enclosed for filing are sixteen (16) reformatted copies of the Rebuttal Testimony of Sandee Buyee-Baker on behalf of Sprint Communications Company Limited Partnership which was filed on January 15, 1998. The testimony has not been modified; it has been reformatted to conform with the procedural order in this docket.

We are enclosing an extra copy of this transmittal letter. We ask that you please mark it to indicate that the reformatted copies were filed and return it to me in the enclosed self-addressed stamped envelope. Copies have been served to the parties shown on the attached certificate of service.

Thank you for your assistance with this matter. We apologize for any inconvenience this may have caused.

Sincerely,

Monica M. Barone
Attorney

- ACK _____
- AEA _____
- APP 2
- CAF _____
- CMU 2
- CTR _____
- EAG _____
- LEG _____
- LRB 54 MB:vw
- CJC _____
- FIN 1 cc: Everett Boyd
- SEC 1 Parties of Records
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
[REDACTED] JAN 21 8
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NUMBER 97082-T1

**REBUTTAL TESTIMONY OF SANDEE BUYSSE-BAKER
ON BEHALF OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

1

DOCUMENT NUMBER-DATE

01136 JAN 21 8

FPSC-RECORDS/REPORTING

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2

3 A. My name is Sandee Buysse-Baker and my business address is 10951 Lakeview
4 Drive, Lenexa, Kansas 66219.

5

6 Q. ARE YOU THE SAME SANDEE BUYSSE-BAKER THAT PRE-FILED DIRECT
7 TESTIMONY IN THIS DOCKET ON BEHALF OF SPRINT COMMUNICATIONS
8 COMPANY LIMITED PARTNERSHIP ("SPRINT")?

9

10 A. Yes, I am.

11

12 WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

13

14 A. The purpose of my rebuttal testimony is to respond to the pre-filed Direct Testimony
15 of R. Earl Poucher, Office of the Attorney General, and Alan Taylor of the Commission
16 Staff.

17

18 DO YOU AGREE THAT THE SLAMMING PROBLEM CAN BE CONTROLLED
19 WITH THE ADDITIONAL RULE CHANGES BEING PROPOSED BY WITNESS
20 POUCHER?

21

22 A. No, not entirely. Sprint agrees that slamming is a significant industry problem.
23 Slamming is clearly a problem for consumers and telecommunications providers alike.
24 Long distance providers, specifically Sprint, have found that slamming complaints are
25 costly to resolve and an inefficient use of our employee's time. Sprint has incurred

1 significant financial loss in its efforts to make the customer whole. Sprint reimburses the
2 customer for all PIC change fees and adjusts the billing to reflect the rate of the previous
3 carrier. It is Sprint's objective to avoid slamming complaints.

4 While it is true that some of the recommendations proposed by Mr. Poucher may have
5 merit, others will be ineffective in reducing the problem of slamming.

6

7 **WHAT ARE YOUR COMMENTS CONCERNING MR. POUCHER'S PROPOSAL**
8 **(Poucher Direct, Page 4, lines 9-12) THAT THE PSC REQUIRE A MONTHLY**
9 **REPORT OF SLAMMING COMPLAINTS RECEIVED BY LECs, ALECs and IXC's?**

10

11 A. Sprint would support this recommendation if a neutral third party were appointed to
12 perform all administrative activities as well as produce the report. This recommendation
13 is consistent with the proposal Sprint made to the FCC for consideration in its upcoming
14 Rulemaking on slamming. Sprint believes that ILECs should not be given the
15 responsibility to produce this report.

16 Additionally, Sprint believes that such a report would provide beneficial information to
17 the entire industry, and allow the Commission to focus on those carriers that intentionally
18 evade the Commission's Rules. These carriers have no real investment in the integrity of
19 the marketplace. Sprint does consider slamming to be a poor business practice since it
20 makes it harder for IXCs to compete because it quickly destroys valued customer
21 goodwill.

22 Sprint has taken decisive action to lessen the "personal trauma" for those customers who
23 claim to have been slammed. Our "No Fault" Policy allows any consumer claiming to
24 have been slammed to receive full reimbursement for all PIC change fees. In addition
25 Sprint will credit the consumer the difference, if any, in the billed rates from those rates

1 that would have applied with the original long distance provider.

2

3 **DOES SPRINT HAVE A SPECIFIC RECOMMENDATION CONCERNING THE**
4 **MONTHLY REPORT?**

5

6 **A. Yes. Sprint recommends that the administrative responsibility for producing this**
7 **monthly report be assigned to and administered by a neutral third party. Allowing the**
8 **LECs to perform this function puts them in the unique position of having authority and**
9 **control over the IXCs that have become their competition. A neutral third-party**
10 **administrator would eliminate the ability of the ILEC to gain market advantage by**
11 **damaging the reputation of competitive IXCs. A neutral third-party administrator would**
12 **ensure that all carriers are judged by the same standards.**

13

14 **DO YOU HAVE ANY COMMENTS CONCERNING THE TEN ADDITIONAL**
15 **CHANGES TO THE PROPOSED RULE AS SUGGESTED BY MR. POUCHER?**

16

17 **A. Yes, I do.**

18

19 **WOULD YOU PLEASE COMMENT ON MR. POUCHER'S SUGGESTED CHANGE**
20 **NUMBER 1.**

21

22 **A. Yes. in those cases where the Staff of the Commission concludes that the company or**
23 **its agent has willfully engaged in fraudulent switching of a customer's choice of carriers,**
24 **Mr. Poucher's suggested change number 1 would require the Commission Staff to initiate**
25 **a separate docket and present each case separately to the Commission for appropriate**

1 disposition. Sprint supports any initiative that identifies legitimate slamming and
2 cramming cases. Accordingly, Sprint concurs in and supports Mr. Poucher's
3 recommendation that the Staff of the PSC be required to initiate a separate docket and
4 present each case separately to the Commission when a company or its agent has willfully
5 engaged in a fraudulent PIC change. Absent mitigating circumstances, Sprint also
6 supports imposing the maximum fine allowable (\$25,000) when any company engages in
7 fraudulent switching of consumers. Moreover, Sprint believes that the only way to deter
8 slamming is for the Commission, to the extent of its authority, to impose punitive
9 sanctions. Sprint fully supports "slamming the slammers."

10 While Sprint supports the obligation of the PSC Staff to investigate customer complaints
11 concerning slamming, it is Sprint's desire that Staff understands that there are a number
12 of situations that contribute to the slamming problem, ranging – perhaps along a
13 continuum – from innocent and inadvertent mistakes by IXCs, ILECs and ALECs in the
14 order entry process to intentional fraud practiced by certain carriers or their marketing
15 agents that use deceptive practices to convert consumers to their service. The real reason
16 for an alleged slam may range from an innocent case of buyer's remorse to an attempt by
17 some subscribers to fraudulently obtain a refund of any carrier change fee incurred in
18 switching to another carrier and perhaps even to obtain free toll service from the allegedly
19 unauthorized carrier.

20 Sprint would also support any and all efforts on the part of the Commission to conduct an
21 investigation to obtain an understanding as to why a slam occurs. Once this root cause
22 analysis has been evaluated, the Commission should use this information in developing
23 its new Rules and imposing penalties for slamming offenses.

24

25 Q. PLEASE COMMENT ON MR. POUCHER'S SUGGESTED CHANGE NUMBER

1 2.

2

3 A. Under Mr. Poucher's suggested change number 2, upon receiving a complaint from a
4 subscriber of an unauthorized change of carriers, whether the complaint is legitimate or
5 not, a LEC is required to: (a) immediately change the customer back to the customer's
6 original carrier; (b) offer to freeze the customer's choice of carriers; (c) charge back the
7 "slamming" IXC all existing billing up to 90 days or three billing periods, whichever is
8 longer, and credit the customers LEC account with the amount of the charge-back, and;
9 (d) block the customer's account from future billing from the carrier that caused the slam.
10 I will comment on each of these four proposed requirements. The proposals Mr. Poucher
11 sets out in (a) and (b) simply would perpetuate the current industry problem of giving
12 LECs power and control over IXCs and permitting anticompetitive behavior. Sprint
13 would recommend that the Commission consider eliminating the LEC's "gatekeeper"
14 control of the carrier change process. Sprint recommends the adoption of a remedy that
15 would remove the LECs as "gatekeepers", rather than add additional requirements as
16 proposed by Mr. Poucher. Sprint further recommends that the Commission assign the
17 administration of the carrier change process to a neutral third party. Sprint recognizes
18 that a third party administrator may need to exercise some discretion in processing carrier
19 change orders received from carriers. It may, for example, want to check to ensure that
20 the carrier with a history of slamming and less than accurate verification procedures has
21 submitted properly verified PIC change orders. Vesting a neutral party with such
22 responsibility does not present the same risk of anti-competitive behavior that exists if the
23 ILECs were to perform the same function. A neutral third party administrator should
24 apply the same standards to all carriers. Third party administrators are not unusual in
25 the telecommunications industry. The telecommunications industry has already set a

1 precedent for using third-party administrators. For example, the industry has been using a
2 third party vendor to administer the national 800 database and will soon begin to use a
3 third party administrator for the National Consumer Telecommunications Database
4 Exchange.

5 Mr. Poucher's proposal in (c) would, in effect, relieve customers who claim to have been
6 slammed of the obligation to pay any of the charges for the calls made during the time
7 that they were assigned to an allegedly unauthorized carrier. Sprint believes that such a
8 rule would only encourage fraud and facilitate an increase in slamming complaints rather
9 than reduce them. When word is out that you can claim "slammed" and you are relieved
10 of the obligation to pay for the toll usage, fraud and slamming complaints will increase.
11 Sprint believes that any rule absolving customers of liability in the event of an alleged
12 unauthorized PIC change only provides incentive for fraudulent slamming claims. There
13 are significant financial and public relations pressures to minimize unauthorized PIC
14 changes for those companies, such as Sprint, that have a long term vested interest in the
15 industry. The general public would be better served if the Commission would focus on
16 those carriers that intentionally and habitually change a customer's service without any
17 authority or justification. In recommendation (d), Sprint fails to understand what benefit
18 would be realized by blocking the customer's account from future billing from the carrier
19 that caused the slam. Although Mr. Poucher may believe that this would relieve the
20 customer of any personal trauma, it would in reality further encourage fraud. When
21 certain consumers learn that they could use dial-around access to the network of the
22 slamming carrier and not be billed for their toll usage, fraud would escalate.

23 Mr. Poucher's proposal to require the LEC to disassociate the customer's regular
24 telephone billing of the charges from the offending carrier for both past and future billing
25 again places the LEC in a position of control over IXCs. As stated earlier in my

1 testimony, Sprint believes that the best method for resolving PIC change disputes is for
2 the Commission to appoint a neutral third party. This method removes all opportunity for
3 anti-competitive behavior. The ILEC will no longer be subject to the competitive
4 pressures to control the PIC change process to their advantage.
5 Sprint would also expect this third-party administrator to conduct a thorough
6 investigation to determine the merit of the complaint. This administrator should have full
7 authority to report its findings to the Commission for assessing penalties as necessary. In
8 today's environment, there is already enormous financial pressure to eliminate slamming
9 complaints. Complaint resolution is inefficient and costly. Sprint LD corrects these
10 situations through its No Fault Policy. When Sprint receives a PIC dispute from the
11 customer's ILEC, we instruct the ILEC to return the customer to his previous carrier and
12 reimburses the customer for all carrier change charges incurred. Sprint not only
13 reimburses the customer for the PIC change fee, we also adjust the customer's billed toll
14 to reflect the rate of the previous carrier (if the previous carrier's rate is lower than
15 Sprint's rate). These carriers do not have much investment in the market nor are they
16 interested in doing business in the long term. They not only violate the Commission's
17 Rules, but they disparage reputable companies such as Sprint. As stated earlier in my
18 testimony, Sprint recommends that the PIC Freeze process be
19 administered by a neutral third party. Allowing the ILEC to impose a PIC Freeze will
20 only facilitate the abuse of responsibility currently practiced by some ILECs.

21

22 **PLEASE COMMENT ON MR. POUCHER'S SUGGESTED CHANGE NUMBER 3.**

23

24 **A. Mr. Poucher's third recommendation would require the Commission to adopt a rule**
25 **providing that no carrier guilty of changing a customer's PIC without his or her**

1 knowledge or authorization will be allowed to bill or collect for any of the services
2 provided to the customer during the period of unauthorized service up to 90 days or 3
3 billing periods, whichever is greater. This recommendation would not inflict any
4 financial hardship on those carriers that do not comply with the current Commission
5 Rules. Rather it would impose significant financial loss for those long distance providers
6 that are diligent in following the Commission's Rules. Although Mr. Poucher may
7 believe that this recommendation would benefit consumers and punish the offending
8 carriers, it will be the carriers that do not comply with the Commission's current Rules
9 that will benefit. These carriers are unlikely to follow any new anti-slamming regulation.
10 In addition, when certain consumers become aware that they will not be billed for their
11 toll usage if they claim to be a slamming victim, fraud will become uncontrollable. This
12 particular recommendation will not have any beneficial impact on slamming due to the
13 fraudulent practices it will create. Sprint believes that slamming complaints should be
14 investigated by a neutral third party. Upon completing this type of investigation if it is
15 determined that slamming did occur, the responsible company should receive the harshest
16 of penalties. The Commission should adopt a Rule that penalizes companies that truly
17 slam customers. However, this determination should be reached after a thorough
18 investigation performed by a neutral third party.

19

20 Q. PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 4.

21

22 A. Mr. Poucher's suggestion number 4 would require that PIC changes may be
23 implemented only after a written notice has been sent from the IXC to the customer and
24 when one of the following conditions has been satisfied: (a) written confirmation of said
25 change of carrier has been received from the customer; or (b) an incoming call has been

1 received directly from the customer or a three way call has been received including the
2 customer and the IXC to the customer's serving LEC requesting the change; or (c) an
3 inbound or outbound telemarketing call from the IXC requesting the change has been
4 verified by a third party recording accepting the change. The recommendation requiring
5 written confirmation from the customer prior to the implementation of a PIC change will
6 unnecessarily delay fulfillment of the customer's request for long distance service. This
7 recommendation will not serve the public interest, but instead will harm both customers
8 and long distance companies.

9 In recommendation (b), requiring an incoming call directly from the customer to the LEC
10 in order to implement the PIC change will continue to authorize the LEC as the
11 "gatekeeper" of the PIC change process. As Sprint has already explained, it appears that
12 at least some ILECs are abusing their gatekeeper responsibilities by using PIC disputes
13 strategically to impede competition.

14 In (c), Mr. Poucher's recommendation to require a third-party recording would not
15 provide any benefit for the consumer. Obtaining a recording of the conversation between
16 the customer and an independent third-party verification vendor is an unnecessary
17 additional step that increases the cost of verification, and adds no additional security for
18 the customer. The "recording" offers no guarantee that the person authorizing the order is
19 the true customer with decision-making authority for the telephone service. Also, the
20 customer could easily deny that the recording is their voice. Additional verification costs
21 will undoubtedly be passed to the consumer in the form of higher rates. Unfortunately,
22 the carriers that are guilty of slamming are the same carriers that do not comply with the
23 current verification rules. It is difficult to expect then that they would pro-actively comply
24 with additional or more stringent rules. The FCC is proposing rule changes, and Sprint
25 believes that the best approach would be to enforce the existing rules and adopt new rules

1 only after the FCC has issued revisions. Carriers will be successful in complying with
2 regulations if both State and Federal Rules are consistent.

3

4 **PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 5.**

5

6 **A. Mr. Poucher's suggestion number 5 would require that the Commission adopt a**
7 **specific rule that forbids the use of deceptive and unfair trade practices by**
8 **telecommunications companies regulated by the Commission. Sprint fully supports Mr.**
9 **Poucher in this recommendation. Carriers that employ sweepstakes and contests to entice**
10 **consumers to sign a disguised LOA and then do not bother to follow the Commission's**
11 **verification rules should be penalized.**

12

13 **PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 6.**

14

15 **A. Sprint supports suggestion number 6 to the extent that new applicants for certification**
16 **should be required to certify that the company intends to provide adequate facilities**
17 **including free inward toll calling for the company to receive and process customer**
18 **inquires. However, Sprint believes that the Commission should refrain from adopting**
19 **rules that mandate a specific level of service. Instead, Sprint recommends that the**
20 **Commission allow the consumer to drive service levels in a competitive market.**

21

22 **PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 7.**

23

24 **A. Mr. Poucher's suggestion number 7 proposes that the Commission adopt a new rule**
25 **requiring that all telecommunications companies subject to the rules of the Commission**

1 shall also be subject to the rules that require LECs to answer 90 percent of the incoming
2 calls to the Business Office within 30 seconds. Sprint does not support mandated service
3 levels similar to what is mandated to the ILECs. Consumers in a competitive
4 marketplace have a choice of carriers, and if an IXC is not providing adequate service
5 levels to meet the needs of the consumers, they can take their business elsewhere. In the
6 past, the consumer did not have this same freedom for LEC service, and so it made sense
7 to mandate service levels to protect the consumer. Since there is already competitive
8 pressure in the long distance marketplace, Sprint does not believe that imposing standards
9 will add any protection for consumers. The same companies that are "slamming"
10 customers do not comply with existing verification rules, arguably they will not comply
11 with state mandated service level standards. For this reason, implementing more rules
12 will not resolve the problem. As stated previously in this testimony, Sprint believes that
13 service levels should not be mandated by the Commission, but mandated by the consumer
14 in a competitive market. Companies that are fraudulently slamming consumers should be
15 punished. Mandates put in place to ensure that a company intends to handle consumer
16 complaints does nothing to stop the slamming from occurring in the first place.

17

18 PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 8.

19

20 A. Mr. Poucher's suggestion number 8 asks that the Commission require LECs, ALECs
21 and IXCs to include the last name, address and telephone number in the transmittal orders
22 involving carrier changes. Under Mr. Poucher's proposal, LECs would be required to
23 reject orders for carrier changes when the originating carrier fails to provide the correct
24 last name and address and telephone number. In the past the LECs have required a match
25 on name and telephone number. What the industry found was that computers are not good

1 at matching names. As a result, the consumer experienced needless delay in fulfilling
2 requests for a change in telephone service provider. Consequently, the name match was
3 eliminated, and orders are now processed based on telephone number. Today, the LECs
4 send a confirmation back to the IXC electronically, and if the name and address do not
5 match Sprint's database, steps are taken to correct the data. Sprint believes this is the best
6 way to protect consumers from keying errors and at the same time to provide service
7 quickly to consumers desiring a change in long distance providers.

8
9 As previously stated in this testimony, the industry has already tried unsuccessfully to
10 include a name match on a carrier change request. This resulted in needless delay in
11 processing customer requests for a change in service providers. It does not make sense to
12 revert back to a process that was not in the best interest of the majority of consumers.

13

14 **PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 9.**

15

16 A. Mr. Poucher's suggestion number 9 would require LECs and all other billing agencies
17 to prominently display within the first two pages of the customer's bill the name of the
18 presubscribed local, local toll and interexchange carriers. Sprint agrees that the LECs and
19 all other billing agencies should be required to prominently display within the first two
20 pages of the customer's bill the name of the pre-subscribed local, local toll and
21 interexchange carriers, and not the name of the underlying facilities based carrier.
22 However, in testimony filed in this proceeding by Mr. J. Alan Taylor, Chief of the Bureau
23 of Service Evaluation, (Taylor Direct, Page 4, lines 21-25) claims were made that
24 underlying facilities based carriers facilitate many slams through their resale programs,
25 and that requiring the name and the certificate number of the carrier will help ensure that

1 underlying carriers do not provide their services to companies that are not certified. Sprint
2 does not bill for resellers utilizing the Sprint network. Sprint is required to include in its
3 tariffs, language that states that the customer reselling or rebilling regulated services must
4 have a certificate from the Commission. Requiring the name or certificate number of the
5 company billing for services on the LEC bill will provide customers with the knowledge
6 of who their provider is. Although there would be costs associated with enhancing the
7 billing systems for the LECs, DXCs, and billing vendors, it may be a more
8 attractive solution in terms of cost compared with requiring a separate CIC code for
9 switchless resellers. From a consumer standpoint, Sprint would argue that it is more
10 customer friendly to require the name and toll free number rather than the certification
11 number. As previously stated in this testimony, Sprint supports providing the name of
12 the company providing the service to the consumer on the bill. There would be costs
13 associated with changing billing systems for all parties involved, but it is an attractive
14 proposal for ensuring that consumers understand who is carrying the service.

15

16 PLEASE COMMENT ON MR. POUCHER'S SUGGESTION NUMBER 10.

17

18 A. Mr. Poucher's suggestion number 10 would require all LECs and ALECs to publish
19 annually a billing insert that explains a "PIC Freeze" and provides a customer with
20 instructions on how to obtain a "PIC Freeze". In addition, new customers would also
21 receive the notice with their first bill. Sprint believes that requiring LECs and ALECs to
22 publish information explaining the "PIC Freeze" would promote and encourage anti-
23 competitive behavior currently practiced by some ILECs. Sprint has already expressed its
24 concern regarding ILEC abuse of their gatekeeper responsibilities. There is already
25 substantial anti-competitive behavior to support relieving the ILECs of any and all

1 activities related to the PIC Freeze process. For example, Ameritech, on the eve of
2 implementation of "1+" intraLATA dialing parity, began a campaign throughout its
3 region that sought to capitalize on the slamming problem in the interLATA market to
4 induce its customers to freeze their entire accounts. Customers who responded to
5 Ameritech's inducement not only froze their selection of IXC but also froze Ameritech as
6 their provider of "1+". Sprint supports the idea that consumers should be
7 knowledgeable about their rights in obtaining a freeze on their carrier choice. However,
8 as stated previously in this testimony, Sprint recommends that the entire PIC Freeze
9 process be administered by a neutral third party. By not only allowing, but also
10 mandating that ILECs administer the PIC Freeze process, puts the ILEC in the unique
11 position of being able to freeze an entire account to its services.

12

13 **Q PLEASE SUMMARIZE YOUR TESTIMONY.**

14

15 **A. Sprint believes that the slamming problem must be controlled and supports any**
16 **initiatives that would assist in eliminating this industry problem. Several of Mr.**
17 **Poucher's proposals would assist in this endeavor. However, several of Mr. Poucher's**
18 **recommendations would not resolve the slamming problem and may, in fact, harm**
19 **competition by authorizing ILEC control over IXCs. In this regard, Sprint cannot support**
20 **any proposal that maintains this status for ILECs. Sprint further requests that the**
21 **Commission not impose Rules that would relieve consumers of their financial obligation**
22 **to pay for service they have received. Any Rule that absolves this obligation would**
23 **increase the number of slamming complaints not reduce them.**
24 **Sprint believes that if the Commission decides to impose new Rules at this time, carriers**
25 **may find they are in jeopardy of non-compliance due to the fact that new State rules may**

1 conflict with existing FCC Rules. The FCC is currently considering appropriate
2 regulation designed to minimize slamming. Although these rules may not have been
3 totally effective in bringing the problem under control, this may be due to the fact that the
4 FCC has not yet imposed the harshest of punishment for offending carriers. However,
5 Sprint recommends that the Commission refrain from implementing new Rules until such
6 time that the FCC completes its Rulemaking. If the Commission decides to proceed with
7 new State Regulations, Sprint requests that the Commission consider how these rules will
8 impact existing FCC regulation.

9

10 DOES THIS CONCLUDE YOUR TESTIMONY?

11

12 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Rebuttal Testimony of Sandee Buysee-Baker and Pre-Hearing Statement, on behalf of Sprint Communications Company Limited Partnership, and Entry of Appearance, was served via United States mail, first class postage paid and properly addressed to the following:

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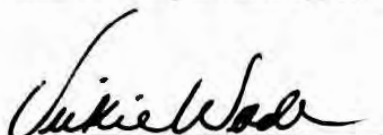
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