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March 16, 1998

VIA HAND DELIVERY

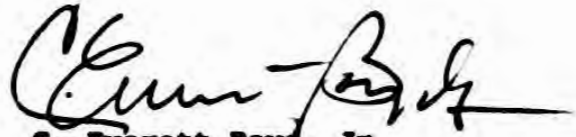
Honorable Blanca S. Bayo
Director - Records and Reporting
Florida Public Service Commission
Room 110
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket Number 970882-TI

Dear Ms. Bayo:

Enclosed for filing in the referenced docket on behalf of Sprint Communications Company Limited Partnership are the original and 15 copies each of Sprint's Posthearing Statement and Posthearing Brief. Also enclosed is a diskette of these two documents.

Sincerely,



C. Everett Boyd, Jr.

- ACK _____
- AFA _____
- APP 2 CEBJr/bc
Enclosures
- CAF 2
- CMU 2 cc: All Parties of Record
- CTR _____
- EAG _____
- LEG _____
- MIN 5
- SEC _____
- TWH 1
- TRC 1
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Petition of Robert A. Bowerman,

Docket No. 970862-TT

Attorney General, and the Citizens of the State of Florida, by and through the Office of Public Counsel, for Initiation of Formal Proceedings,

Filed: March 16, 1998

Pursuant to Section 128.57, F.S., to Investigate the Practice of Slamming and to Determine the Appropriate Remedial Measures

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP
POTENTIAL STATEMENT OF ISSUES AND POSITIONS**

COMES NOW Sprint Communications Company Limited Partnership

(“Sprint”) submits its Forthcoming Statement of the Issues and Positions in the above-captioned docket.

ISSUES AND POSITIONS

SPRINT'S BASIC POSITION:

Sprint agrees that unauthorized changes in a subscriber's carrier selection, a practice commonly known as “slamming,” is a significant consumer problem. Slamming clearly impacts all participants in the competitive interchange market. What is not yet certain, however, is how best to address the problem. Sprint believes the Commission's proposed rules are unnecessary as the current rules are adequate and, when adhered to, have the capability to control the slamming problem. Should the Commission adopt additional rules, however, Sprint respectfully urges the Commission to consider its position and brief of the evidence on the rules contained herein.

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
03232 MAR 16 8
FPSC-RECORDS/REPORTING

Issue 1: Should the Commission adopt new rule 25-4.845, Florida Administrative Code, as proposed by the new Rule 25-24.845, Florida Administrative Code, as proposed by the Commission at the December 16, 1997, Agenda Conference?

• **Sprint's Position:** Generally, Sprint does not oppose this rule. As stated above, Sprint does not believe additional substantive rules are necessary. Sprint, however, does not oppose a rule that seeks to apply the current rules to ALECs.

Issue 2: Should the Commission adopt the proposed amendments to Rule 25-4.003, Florida Administrative Code, as proposed by the Commission at the December 16, 1997, Agenda Conference?

• **Sprint's Position:** Sprint does not oppose the rule changes.

Issue 3: Should the Commission adopt the proposed amendments to Rule 25-24.110, Florida Administrative Code, as proposed by the Commission at the December 16, 1997, Agenda Conference?

• **Sprint's Position:** No. Should the Commission determine that additional rules are necessary, the Commission should delay implementation of any new rules until federal rules are implemented. Sprint believes any additional rules the Commission adopts should be consistent with those federal rules.

Issue 4: Should the Commission adopt the proposed amendments to Rule 25-24.118, Florida Administrative Code, as proposed by the Commission at the December 16, 1997, Agenda Conference?

*** Sprint's Position: Sprint supports the change to Rule 25-4.118(4), F.A.C.**

Sprint recommends, however, that the rule be clarified to indicate that negotiable instruments such as checks are not to be combined with an LOA. Sprint also supports proposed Rule 25-4.118(4), F.A.C.

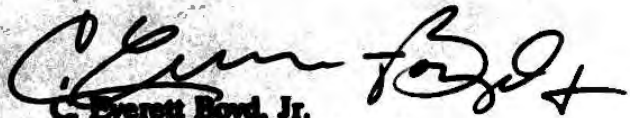
Sprint does not support audio recording of third party verification. It will not increase consumer protection; it will only increase cost of verification.

Additionally, Sprint does not support proposed Rule 25-4.118, F.A.C. Substantial additional printing and administrative costs will be incurred if state-specific information must be included. Sprint also does not support Rule 25-4.118(8), or any rule that would relieve customer responsibility for paying for services received. Finally, Sprint does not support Rule 25-4.118(10). Sprint believes requiring companies to identify third party verifiers is unnecessary and will only create customer confusion.

Issue 5: Should the Commission adopt the proposed amendments to Rule 25-24.490, Florida Administrative Code as proposed by the Commission at the December 16, 1997, Agenda Conference?

* **Sprint's Position:** No. Should the Commission determine that additional rules are necessary, the Commission should delay adopting any new rules until federal rules are implemented. Sprint believes any addition rules the Commission adopts should be consistent with those federal rules.

Respectfully submitted this 16th day of March, 1998.



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CERTIFICATION OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. mail on this 16th day of March 1990, to the following:

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