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September 29, 1995

VIA HAND DELIVERY

Ms. Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
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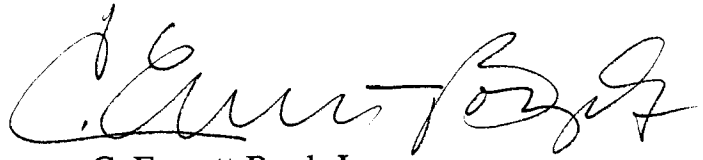
In Re: Investigation into Temporary Local Telephone Number
Portability Solutions to Implement Competition in Local
Exchange Telephone Markets; Docket No. 950737-TP

Dear Ms. Bayó:

Enclosed for filing with the Commission is the original and 16 copies of Sprint
Communications Company Limited Partnership's Prehearing Statement along with a 3 1/2"
diskette in the above captioned proceeding. 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,



C. Everett Boyd, Jr.

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VFA _____
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Enclosures



DOCUMENT NUMBER-DATE
09662 SEP 29 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Temporary)
Local Telephone Number Portability)
Solution to Implement Competition in)
Local Exchange Telephone Markets)
_____)

Docket No. 950737-TP
Filed: September 29, 1995

**PREHEARING STATEMENT OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

In accordance with Rule 25-22.038(3), Florida Administrative Code, and the Florida Public Service Commission's ("Commission") Order Establishing Procedure in the above-captioned docket, Sprint Communications Company Limited Partnership ("Sprint") respectfully submits the following Prehearing Statement.

A. Witnesses

Sprint does not have a witness in this proceeding at this time.

B. Exhibits

Sprint does not have any exhibits at this time. Sprint reserves the right to file exhibits at a later date as deemed necessary.

C. Basic Position

Sprint's basic position is that anything short of true service provider number portability is an inferior service. However, it may take as long as two years to achieve true service provider number portability. Therefore, among the alternatives that exist in today's technology, Remote Call Forwarding (RCF) is the preferred solution. RCF supports more CLASS functionality than does Direct Inward Dialing (DID). Additionally, RCF requires an isolated switching function, as opposed to a dedicated trunk group as is required with DID, and is, therefore, somewhat easier and cheaper for both the Incumbent Local Exchange Company (ILEC) and the Competitive Local Exchange Company (CLEC) to install. The ILEC should base the charge on Long Run Incremental Costs (LRIC) to provide the interim solution of RCF.

D. Fact Issues

See Sprint's Position on Issues below.

E. Legal Issues

See Sprint's Position on Issues below.

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F. Policy Issues

See Sprint's Position on Issues below.

G. Position on Issues

ISSUE 1: What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

SPRINT POSITION: Section 364.16(4), Florida Statutes states that consumers should have access to different local exchange service providers without being disadvantaged, deterred, or inconvenienced by having to give up the consumer's existing local telephone number. Therefore, the Statute mandates that LECs, except small LECs under rate of return regulation, shall provide a temporary means of achieving telephone number portability. If the parties are unable to successfully negotiate the prices, terms, and conditions of a temporary number portability solution, the commission shall establish a temporary number portability solution by no later than January 1, 1996.

ISSUE 2: What technical solutions will be available by January 1, 1996, to provide temporary number portability?

SPRINT POSITION: There appear to be two primary means of offering a type of number portability that would be available January 1, 1996 - Remote Calling Forwarding (RCF) and Flexible Direct Inward Dialing (DID).

ISSUE 3: What are the advantages and disadvantages of each solution identified in Issue 2?

SPRINT POSITION: Under RCF, if a customer transfers his number from Carrier A to Carrier B, Carrier A's switch routes the call to Carrier B by translating the dialed number into a number with an NXX corresponding to a switch operated by Carrier B. Under DID, Carrier A routes the customer's calls over a dedicated facility to Carrier B's switch.

Both RCF and DID are inferior to a system of true service provider portability for geographic numbers. First, RCF and DID allow the incumbent LEC to retain bottleneck control over the call, providing the incumbent LEC with the switched access charge revenues associated with terminating intrastate calls (including calls which ultimately terminate over the competitive local service provider's network) as well as marketing information regarding which customers have subscribed to competitive local service providers. Second, RCF and DID use scarce numbering resources inefficiently, since they require two 10-digit telephone numbers, thereby contributing to code exhaust. Third, RCF and DID are technically inferior to a true system of geographic number portability. For example, RCF and DID do not forward

carrier identification code (CIC) information and therefore the competitive local service provider cannot bill IXCs directly; and there are implications for 911 and certain CLASS services (Caller-ID and automatic call back) since it is the forwarded rather than dialed number which will appear. Fourth, because there are two separate calls involved with RCF and DID, forwarded calls have higher set-up time.

As an interim solution, Sprint supports RCF. RCF is preferable to DID because it ubiquitously supports more CLASS functionality than does DID, which requires ISDN/PRI technology to provide CLASS functionality. In addition, RCF requires an isolated switching function, as opposed to a dedicated trunk group as is required with DID, and is therefore somewhat easier and cheaper for both the incumbent and the competitive local service provider to install.

ISSUE 4: What costs are associated with providing each solution identified in Issue 2?

SPRINT POSITION: Sprint does not have the information to be responsive to this issue.

ISSUE 5: How should the costs identified in Issue 4 be recovered?

SPRINT POSITION: The incumbent LEC offering RCF or DID should base the charge to the competitive LEC on long run incremental cost for these services. Charging higher than these costs would encourage the leverage situation already being experienced in the access market due to higher than necessary intrastate access rates. Obviously, the customers of the incumbent LEC would not be assessed any fee to recover the costs of number portability RCF, since such feature is not necessary to complete calls on the incumbent's own network.

ISSUE 6: What is/are the most appropriate method(s) of providing temporary number portability?

SPRINT POSITION: Please see the response to Issue 2.

ISSUE 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

SPRINT POSITION: The appropriate cost standard, as discussed in the response to Issue 5, is LRIC.

ISSUE 8: Should this docket be closed?

SPRINT POSITION: Sprint does not have a position on this issue at this time.

H. Stipulated Issues

Sprint is not aware of any issues that have been stipulated.

I. Pending Motions

Sprint is not aware of any pending motions.

J. Other Requirements

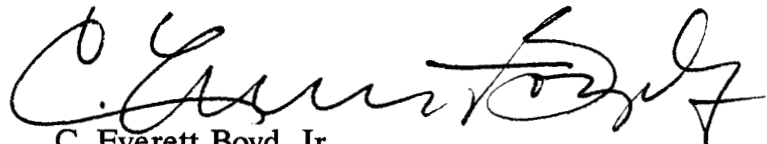
Sprint is not aware of any requirement with which it cannot comply.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

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and



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Its Attorney

September 29, 1995

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail, on the 29th day of September, 1995, to the following:

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