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November 13, 1997

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

Re: Rebuttal Testimony in Docket No. **971194-TP**

Dear Ms. Bayo:

Enclosed for filing in this docket is Page 6 of the Rebuttal Testimony of F. Ben Poag which was inadvertently omitted in the original filing of October 28, 1997.

Please return a stamped copy of this letter for our files. A copy is provided for this purpose. I can be reached at 850/847-0244.

Sincerely,

Charles J. Rehwinkel /cs
Charles J. Rehwinkel

ACK _____

AFA _____ Enclosure

APP _____

CAF _____ cc: Beth Culpepper, Esq.

CMU *Worley* Will Cox, Esq.

CTR _____ Bill Adams, Esq.

EAG _____

LEG *2* _____

LIN *3 ting* _____

OPC _____

RCH _____

SEC *1* _____

WAS _____

OTW _____

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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11681 NOV 13 97

FPSC-RECORDS/REPORTING

1 traffic. As a result, if Wireless One's claims are
2 accepted, Sprint would be required to pay Wireless One
3 transport and tandem switching on every call it
4 terminates to Wireless One. Conversely, since Sprint's
5 end office switches have functionalities that Wireless
6 One's cell sites do not have, Wireless One can today
7 directly connect to Sprint's end offices to avoid paying
8 Sprint tandem and transport charges. Thus Sprint would
9 be forced not only to pay those charges on every call,
10 but Sprint would also be contributing to Wireless One's
11 loop cost recovery.

12
13 Q. Do you agree with Mr. Heaton's conclusion on page 10 of
14 his testimony beginning on line 5, that Sprint's
15 agreements with 360° Communications acknowledged Wireless
16 One's position?

17
18 A. No. First, I believe it is inappropriate to offer a
19 single portion of a negotiated agreement in this
20 arbitration. Second, the interpretation of the language
21 of Wireless One here was not an interpretation raised by
22 360 Communications during the negotiations. It was only
23 when Wireless One attempted to misconstrue the FCC's
24 language in this case that Sprint thought it necessary to
25 expand the language to clarify the definition.

ARTER & HADDEN

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November 13, 1997

VIA FEDERAL EXPRESS

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

Re: *Wireless One Network's Petition for Arbitration with Sprint Florida*
Docket No. **971194-TP**

Dear Ms. Bayo:

Please find enclosed for filing the original and seventeen copies of each of the following:

1. Wireless One's Memorandum in Opposition to Sprint's Motion to Strike Wireless One's Response to Sprint's October 20, 1997 Motion for Determination of Issues and Request for Oral Argument; 11690-97
2. Wireless One's Memorandum in Opposition to Sprint's Motion to Strike Portions of the Rebuttal Testimony of John Meyer and Frank Heaton and the Deposition of F. Ben Poag; and 11691-97
3. Wireless One's Memorandum in Opposition to Sprint's Motion to Strike Portions of the Direct and Rebuttal Testimony of Francis J. Heaton. 11692-97

Please date stamp and return two copies of each document in the enclosed self-addressed envelope. Thank you for your attention to this matter.

Very truly yours,



William A. Adams

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3 Enclosures

ACK _____
 AFA _____
 APP _____
 CAF _____
 CMU Newton
 CTR _____

ARTER & HADDEN

Ms. Blanca S. Bayo
November 13, 1997
Page 2

cc: (w/enc.) Frank Heaton
James A. Dwyer
Beth Culpepper, Esq. [via facsimile (850/413-6250) and U.S. Mail]
William Cox, Esq. [via facsimile (850/413-6250) and U.S. Mail]
Charles Rehwinkel, Esq. [via facsimile (850/878/0777) and U.S. Mail]

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