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February 14, 2002

**BY HAND DELIVERY**

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

Re: Docket No. 990649B-TP

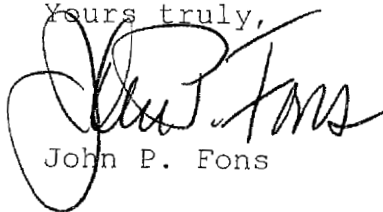
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Response in Support of Verizon Florida Inc.'s Motion for Extension of Time to File Surrebuttal Testimony.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into  
Pricing of Unbundled Network  
Elements

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DOCKET NO. 990649B-TP  
FILED: February 14, 2002

**SPRINT-FLORIDA, INC.'S RESPONSE IN SUPPORT OF  
VERIZON FLORIDA INC.'S MOTION FOR EXTENSION  
OF TIME TO FILE SURREBUTTAL TESTIMONY**

Sprint-Florida, Incorporated("Sprint") hereby supports Verizon Florida Inc.'s ("Verizon") Motion for Extension of Time to File Surrebuttal Testimony ("Motion"), and respectfully requests an extension of time to file surrebuttal testimony. Even though Verizon's Motion requests that its extension of time apply to all parties and indicates Sprint's support of Verizon's Motion, Sprint is offering its own basis for an extension of time to file surrebuttal testimony.

1. As noted in Verizon's Motion, Verizon and Sprint filed their direct cases, including cost studies and cost of capital testimony, on November 7, 2001. The first time Sprint and Verizon saw the position of Staff and the alternative local exchange carriers ("ALECs") was when they filed rebuttal testimony on January 30, 2002. Currently, all parties' surrebuttal testimony is due on February 19, 2002. Sprint agrees with Verizon that this period of time is insufficient for Sprint and Verizon to adequately prepare surrebuttal testimony.

2. Sprint received the testimony of Frank Wood on behalf of KMC Telecom II, Inc. ("KMC"); George Ford on behalf of Z-Tel Communications, Inc. ("Z-Tel"); and David Draper on behalf of Staff on February 4, 2002. Mr. Ford's testimony had been e-mailed to Sprint on January 30, 2002. Because the existing schedule allows only 20 days for preparation of surrebuttal on costing and cost of capital issues, Sprint is having difficulty preparing responsive testimony by February 19, 2002.

3. For example, the cost of capital testimony presented by George Ford on behalf of Z-Tel presents an unusual challenge, since his cost of capital testimony focuses on BellSouth's cost of capital testimony and not Sprint-Florida's cost of capital testimony presented by Brian Staihr. Obviously, this requires Sprint to delve into the record in the BellSouth proceeding in preparing its surrebuttal testimony. This imposes a step not normally contemplated in preparing testimony for a Sprint-specific cost of capital. Besides being awkward, this step is also time-consuming.

4. Additionally, Sprint has only now completed its review of Staff and ALECs' rebuttal testimony, and is in the process of preparing discovery to Staff and the ALECs regarding that testimony. Under the current procedural order, even if the discovery were filed today, responses would not be due until well after Sprint's surrebuttal testimony has been filed. An

extension of time until at least the end of March will aid Sprint in being able to have the discovery responses in hand when preparing its surrebuttal testimony.

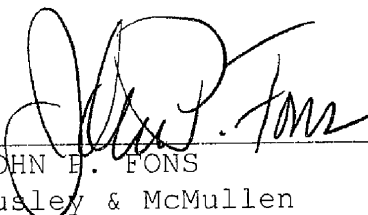
5. As also noted by Verizon, the ALECs had 84 days (since November 7, 2001) to evaluate and respond to Sprint and Verizon's direct testimony and to obtain discovery. An extension of time to file surrebuttal testimony will not prejudice any party. The hearing in this case was originally scheduled to begin on March 11, 20 days after filing of surrebuttal testimony. As pointed out in Verizon's Motion, because the hearing has been moved to April 29, an extension of time - but not beyond April 9 - for surrebuttal will give parties the same amount of time (at least 20 days) they originally had to evaluate the surrebuttal testimony before the hearing.

6. For all the reasons discussed in Verizon's Motion, and Sprint's Response, Sprint joins in Verizon's request that the Commission grant all parties an extension to file their surrebuttal testimony.

Respectfully submitted this 14th day of February, 2002.

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and

A handwritten signature in black ink, appearing to read "John E. Fons", is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (\*) this 14th day of February, 2002, to the following:

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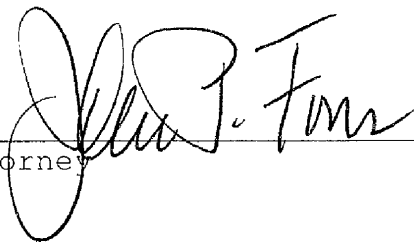
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