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Atlanta, GA 30339-3166

December 17, 1992

VIA AIRBORNE EXPRESS

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Fletcher Building
Tallahassee, Florida 32399-0870

Re: Docket No. 920260-TL - Comprehensive Review of the
Revenue Requirements and Rate Stabilization Plan of
Southern Bell Telephone and Telegraph Company

Dear Mr. Tribble:

Enclosed for filing with the Commission are an original and
fifteen (15) copies of Sprint Communications Company Limited
Partnership's Prehearing Statement along with a 5-1/4" diskette in
the above-referenced matter. A sixteenth copy is enclosed which we
would request you return with your file-stamp in the enclosed self-
addressed envelope.

Thank you.

AK 2
AA 3 Very truly yours,
AP _____
CP _____
DP (DP) Chanthina R. Bryant
EP _____
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HP _____
IP _____
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CRB:lj

cc: Parties of Record

Handwritten note: 920260-TL-15

Handwritten signature: Jan

DOCUMENT NUMBER-DATE

14668 DEC 18 1992

FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Comprehensive Review of)	
the Revenue Requirements and Rate)	Docket No. 920260-TL
Stabilization Plan of Southern)	
Bell Telephone and Telegraph)	Filed: December 18, 1992
Company)	
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**PREHEARING STATEMENT OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

Sprint Communications Company Limited Partnership (hereinafter "Sprint") hereby submits its Prehearing Statement in the above-captioned docket pursuant to Rule 25-22.038(3), Florida Administrative Code, and Order Nos. PSC-92-1195-PCO-TL on Prehearing Procedure and PSC-92-1320-PCO-TL Additional Order on Prehearing Procedure issued October 21, 1992 and November 13, 1992, respectively.

A. WITNESSES

Sprint will present Mr. Emeric Kapka as its witness in this proceeding. Mr. Kapka will address New Issue No. 34 as identified in the prehearing order.

B. EXHIBITS

Sprint will sponsor one direct exhibit in this proceeding. Sprint reserves the right to present additional exhibits following the completion of discovery.

C. BASIC POSITION

Sprint's interest in this docket is limited solely to Issue No. 34 as it pertains to the areas of switched access rates and toll services. Southern Bell's Proposed Price Regulation Plan provides for only a slight reduction in access rates. In addition, the proposed distribution of the \$47.5 million customer credit does not even address access services. It is Sprint's position that Southern Bell's access rates, especially for switched services, should be reduced under the framework of the Price Regulation Plan, should the Commission adopt it. Sprint also urges the Commission to require a portion of the revenue reduction be targeted to access rates. Sprint believes that the long-term viability of interexchange carriers ("IXCs") will depend on reductions in the sizable cost of switched access which, in turn, would foster a more competitive long distance marketplace.

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D. FACT ISSUES

See Sprint's Position on Issues below.

E. LEGAL ISSUES

See Sprint's Position on Issues below.

F. POLICY ISSUES

See Sprint's Position on Issues below.

G. POSITION ON ISSUES

Sprint's interest in this docket is limited to Issue No. 34. Sprint takes no position on the remaining issues at the present time. Sprint, however, reserves the right to take a position on these issues at a later date.

ISSUE 34: Southern Bell has made proposals in the areas of switched access service rates, the interconnection usage rates for mobile service providers and toll services as shown below. Should SBT's proposals be approved? Should there be any other changes in switched access, toll or mobile interconnection usage rates (e.g., reduce intrastate switched access rates to interstate levels)?

- A) To reduce switched access rates in the local transport element for both originating and terminating access from \$.01600 to \$.01328.
- B) To reduce current mobile originating peak usage rate from \$.03470 to \$.03200.
- C) To reduce the optional land-to-mobile intra-company usage charge from \$.0597 to \$.0572.
- D) To reduce the optional land-to-mobile inter-company usage charge from \$.1692 to \$.1667.
- E) To make no changes to its toll services rates.

SPRINT POSITION:

Sprint agrees with the proposal to reduce switched access rates. However, it is Sprint's position that there should be far greater reductions made in the area of switched access than those proposed by Southern Bell. Sprint believes that the reductions as proposed by Southern Bell could have achieved an equivalent revenue reduction in a far more efficient way. Southern Bell proposes to reduce average originating and terminating switched access rates per minute from 4.610 cents and 7.03 cents to 4.403 and 6.758 cents, respectively. This rate reduction is achieved by lowering the local transport element for both originating and terminating switched access from 1.60 cents to 1.328 cents.

Sprint proposes that the time-of-day aspect of the switched access rate structure be targeted for immediate reductions. In fact, it is Sprint's position that time-of-day discounts be eliminated entirely from Southern Bell's switched access tariff. These discounts should be abolished because they serve no useful economic function and only result in shifting Southern Bell's access expense from the largest IXC to other IXCs, such as Sprint. Revenue generated by removal of the discounts should be applied to lowering the originating CCLC from its current excessively high level.

H. STIPULATED ISSUES

Sprint is not aware of any issues which have been stipulated to by the parties.

I. PENDING MOTIONS

Sprint is not aware of any pending motions filed by or directed to Sprint.

J. OTHER REQUIREMENTS

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

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY LIMITED
PARTNERSHIP

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Its Attorneys

DATED: December 18, 1992

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and foregoing PREHEARING STATEMENT in FPSC Docket No. 920260-TL; "COMPREHENSIVE REVIEW OF THE REVENUE REQUIREMENTS AND RATE STABILIZATION PLAN OF SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY" upon the following parties of record by depositing same in the United States Mail, first class, postage prepaid.

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This 17th day of December, 1992.

SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

By: Chanthina R. Bryant
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Attorney, State Regulatory