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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Comprehensive Review of the
Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

Docket No. 920260-TL
Filed: August 17, 1995

POST-HEARING STATEMENT OF ISSUES AND POSITIONS OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

Sprint Communications Company Limited Partnership ("Sprint"),
by and through its undersigned counsel and pursuant to Commission
Rule 25-22.056(3), Florida Administrative Code, hereby submits its
Post-Hearing Statement of Issues and Positions in the above-
captioned docket.

I. BASIC POSITION

* Sprint's Basic Position: Sprint opposes Southern Bell's
("SBT") proposed Extended Calling Service ("ECS") plan. The rate
levels proposed do not satisfy current access imputation
requirements under current intrastate access changes.

The plan effectively converts competitive intraLATA toll
calling to monopoly local service in advance of 1+ intraLATA
competition being implemented. CWA's proposal is flawed because it
proposes to lower rates for basic services already provided below
cost.

Issue 1: Which of the following proposals to dispose of \$25
million for Southern Bell should be approved?

(1) SBT's proposal to implement the Extended Calling
Service plan pursuant to the tariff filed on May 15, 1995. (T-95-
304.)

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(2) CWA's proposal to reduce each of the following by \$5 million:

(i) Basic "lifeline" senior citizens telephone service;

(ii) Basic residential telephone service;

(iii) Basic telephone service to any organization that is non-profit with 501(c) tax exempt status;

(iv) Basic telephone service of any public school, community college and state university;

(v) Basic telephone service of any qualified disabled ratepayer.

(3) McCaw's and FMCA's proposal that a portion be used, if necessary, to implement the decisions rendered in Docket No. 940235-TL.

(4) Any other plan deemed appropriate by the Commission.

* Sprint's Position: (1) Sprint is opposed to SBT's ECS proposal. The plan is not based upon true community of interest factors. The impact of the plan is clearly to remonopolize the intraLATA toll market in the face of 1+ intraLATA toll competition being implemented at the Commission's recent direction.

* Sprint's Position: (2) Sprint is opposed to the CWA proposal. It is generally not good public policy to reduce rates for services already being provided below cost. Other services must subsidize the below cost service, which creates distortions in the marketplace that are very difficult to correct.

* Sprint's Position: (3) Sprint takes no position on this issue.

* Sprint's Position: (4) Sprint urges the Commission to adopt a pro-competitive position that would allow all carriers to compete for toll traffic in the intraLATA market. Local calling areas should not be expanded without sufficient evidence demonstrating a community of interest.

Issue 2: If the Southern Bell proposal is approved, should the Commission allow competition on the Extended Calling Service Routes? If so, what additional actions, if any, should the Commission take?

* Sprint's Position: The SBT proposal forecloses effective competition on the ECS routes, with 7 digit dialing. IXCs will not be able to compete for this traffic even with 1+ intraLATA presubscription. SBT must impute two ends of switched access and implement reduced access charges and wholesale IXC rates for the routes.

Issue 3: When should the tariffs be filed and what should be the effective date?

* Sprint's Position: Sprint takes no position on this issue.

Issue 4: Should this docket be closed?

* Sprint's Position: This docket should remain open to allow Commission oversight over the proposal implemented and to examine further rate reductions ordered in this docket.

LEGAL ISSUES

* **Sprint's Position:** Sprint adopts the positions of AT&T on the legal issues identified by Staff.

Respectfully submitted,



C. EVERETT BOYD, JR.
of the law firm of
Ervin, Varn, Jacobs,
Odom & Ervin
Post Office Drawer 1170
Tallahassee, FL 32302
(904) 224-9135

**ATTORNEYS FOR SPRINT
COMMUNICATIONS COMPANY LIMITED
PARTNERSHIP**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail on this 17th day of August, 1995, to the following:

Michael Tye
106 East College Avenue
Suite 1420
Tallahassee, FL 32301

Benjamin H. Dickens, Esquire
2120 L. Street, N.W.
Washington, DC 20037

Peter Q. Nyce, Jr.
901 N. Stuart Street, Suite 400
Arlington, VA 22203-1837

Douglas Metcalf
Communications Consultants
Post Office Box 1148
Winter Park, FL 32790-1148

Laura Wilson
Post Office Box 10383
Tallahassee, FL 32302

Joseph P. Gillan
Post Office Box 541038
Orlando, FL 32854

Lance Norris
315 S. Calhoun Street
Suite 710
Tallahassee, FL 32301

Donald L. Bell, Esquire
104 East Third Avenue
Tallahassee, FL 32303

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302

Richard Melson
Post Office Box 6526
Tallahassee, FL 32314

Michael J. Henry
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342

Vicki G. Kaufman
117 S. Gadsden St., 3rd Floor
Tallahassee, FL 32301

Kenneth Hoffman
Post Office Box 1876
Tallahassee, FL 32302


Charles J. Beck
Office of Public Counsel
111 W. Madison Street, Rm. 812
Tallahassee, FL 32399-1400

Michael Gross
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, FL 32399-1050

R. Douglas Lackey
675 W. Peachtree Street
Suite 4300
Atlanta, GA 30375

Tracy Hatch
101 E. Gaines Street
Tallahassee, FL 32399-0863

Floyd R. Self
Post Office Box 1876
Tallahassee, FL 32302


C. EVERETT BOYD, JR.