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Benjamin W. Fincher Attorney, State Regulatory

July 11, 1996

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

In Re: Consideration of Bell South Telecommunications, Inc.'s entry into InterLATA Services pursuant to Section 271 of the Federal Telecommunications Act of 1996; Docket No. 960786-TL

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AFA	. Dear Ms. Bayo:	
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	Enclosed for filing, is the original and 16 Sprint Communications Company Limited Parti	
(CMI) Green	proceeding.	
CTR		
EAG	Please date stamp the additional copy o	
LEG	to the undersigned in the enclosed self address	sed stamped envelope.
LIN <u>5</u>	Thank you for your cooperation.	
OPC		
RCH		Sincerely,
SEC		Benjamin W. Fincher
WAS		V
отн		Benjamin W. Fincher THK

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Enclosures

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## FLORIDA PUBLIC SERVICE COMMISSION

Consideration of BellSouth ) Telecommunications, Inc.'s entry into ) InterLATA services pursuant to Section ) 271 of the Federal Telecommunications ) Act of 1996 )

Docket No. 960786-TL

## PROPOSED ISSUES OF SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

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Sprint Communications Company Limited Partnership ("Sprint"), Intervenor, hereby submits this its list of proposed issues in connection with the above proceeding.

I. Does access or interconnection provided or generally offered by BellSouth to other telecommunications carriers include each of the following?:

1. Interconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1). Should there be a presumption that interconnection at switching points is technically feasible?

2. Nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1). Should BellSouth have the burden of proof to show that a requested network element is not technically feasible?

3. Nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of section 224. Should tariffs be filed for pole attachments and contracts executed for access to ducts, conduits and rights-of-way? Should such contract terms, conditions and prices be made available to other telecommunications carriers for the same facilities and rights-of-way?

4. Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. Should there be any restrictions on how local loop transmission can be used?

5. Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services. Should there be any restrictions on how local transport can be used?

6. Local switching unbundled from transport, local loop transmission, or other services. Should there be any restrictions on how local switching can be used?

7. Nondiscriminatory access to: (1) 911 and E911 services; (2) directory assistance services to allow the other carrier's customers to obtain telephone numbers; and (3) operator call completion services. Should resale prices include population of the databases and access to the services?

8. White pages directory listings for customers of the other carrier's telephone exchange service.

9. Until the date by which telecommunications numbering administration guidelines, plan or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers. After than date, compliance with such guidelines, plan, or rules.

10. Nondiscriminatory access to databases and associated signaling necessary for call routing and completion.

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What are the databases and associated signaling necessary for call routing and completion?

11. Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.

12. Nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3).

13. Reciprocal compensation arrangements in accordance with the requirements of section 252(d)(2). Should interconnection and reciprocal compensation be used to fund universal service?

14. Telecommunications services are available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3). Should BellSouth's local service prices be rebalanced, based on actual costs?

- II. Is there at least one CLEC providing local service, over its own facilities, to both business and residential customers? If so, who and where? Specifically what services is the CLEC(s) providing?
- III. The FCC must determine if BellSouth's entry into inregion long distance is in the public interest. Is it in the public interest in Florida at this time?
- IV. Assuming local service competition can be measured in Florida using the following parameters, what is the extent of local competition?
  - Market share of local service providers. Residential/Business
  - 2. Revenue by local service provider.
  - 3. Number of customers Residential/Business

by local service provider.

- 4. Number of access lines served by CLECs in comparison with total access lines in BellSouth service
- 5. Name, number and similarity of services provided by local service provider(s).
- 6. Customer complaints by local service provider
- 7. Names of carriers that have requested interconnection or the use of unbundled network elements
- 8. Names of carriers that have requested to resell services
- Types of interconnection, unbundled elements or other services requested of BellSouth, when requested and when provided.
- V. How should the existing interconnection agreements be used to evidence compliance with Section 271 of the Act?
- VI. What agreements have been executed to date by BellSouth, including terms and conditions, and what negotiations are in progress?
- What other factors should be considered before VII. BellSouth is allowed to enter in-region interLATA long distance market? (Notice should be taken of the Department of Justice's "working draft" of a paper outlining issues to consider in evaluating Bell Company applications. This paper lists, among other items: (1) the BOC access lines in state (2) the number, type and location of BOC's switches in state including type of interconnection offered by Central Office, (3) the number and types of which the BOC's services customers to are available, (4) the BOC's state revenues, broken down by service type, (5) the BOC should file studies, reports, analyses done in year preceeding application that contain data on BOC's market share or those of its competitors (6) the BOC should file studies that compare traffic volumes, revenues, or facilities of the BOC and its competitors (7) the

BOC should outline specifically what changes were made to its network and operational procedures to implement the competitive checklist.)

> Respectfully submitted, Sprint Communications Company Limited Partnership

Benjamin W. Fincher THIS

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Its Attorneys

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the within and foregoing Proposed Issues of Sprint Communications Company Limited Partnership has been served upon the following, via facsimile.

This \_\_\_\_\_ day of July, 1996.

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