Ruth Nettles

090444-Tx

From:	Nelson, Douglas [GA] [Douglas.C.Nelson@sprint.com]
Sent:	Friday, February 26, 2010 1:27 PM
То:	Filings@psc.state.fl.us
Cc:	Ricardo@Cryslink.com; Kiwanis Curry; Toni Earnhart; Timisha Brooks
Subject:	DOCKET NO. 090444-TX
Attachments	Sprint Letter Docket 090444-TX.pdf

The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:

Douglas C. Nelson Counsel, State Regulatory Affairs Sprint Nextel 233 Peachtree St., NE Suite 2200 Atlanta, GA 30303 (o) 404-649-8983 (m) 678-777-8473 Email: douglas.c.nelson@sprint.com

The docket number and title of docket:

DOCKET NO. 090444-TX

Application for certificate to provide competitive local exchange telecommunications service by Crystal Link Communications, Inc.

The name of the parties on whose behalf the document is filed:

Sprint Communications Company Limited Partnership

The total number of pages in the attached document: 2

A brief but complete description of each attached document:

Sprint letter concerning application for certificate to provide competitive local exchange telecommunications service filed by Crystal Link Communications, Inc.

Douglas C. Nelson Counsel, State Regulatory Affairs Sprint Nextel 233 Peachtree St., NE Suite 2200 Atlanta, GA 30303 (o) <u>404-649-8983</u> (m) 678-777-8473

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Douglas C. Nelson

Counsel, State Regulatory Affairs

Sprint Nextel 233 Peachtree St., N.E., Suite 2200 Atlanta, GA 30303

February 26, 2010

Ms. Ann Cole Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Re: Docket 090444; Application for certificate to provide competitive local exchange telecommunications service by Crystal Link Communications, Inc.

Dear Ms. Earnhardt:

Sprint Communications Company, Limited Partnership d/b/a Sprint ("Sprint"), a certificated interexchange carrier operating in Florida (Company Code TI793), shares the concerns raised by AT&T in its January 27, 2010 letter concerning the above-captioned application for certificate to provide competitive local exchange telecommunications service filed by Crystal Link Communications, Inc. ("Crystal Link"). Crystal Link's application should be thoroughly examined, particularly with regard to ensuring disclosure and consideration of any prior activities undertaken by its principals to engage in "churning" operations through entities such as International Telnet that are no longer certificated in Florida.

Generally, such "churning" operations involve competitive local exchange carriers ("CLECs") engaging in suspect business practices that prevent interexchange carriers from collecting valid dial-around calling charges. In one variation of "churning" the CLEC procures a bank of local lines from the incumbent local exchange carrier on a wholesale basis and permits its "customers" to make dial-around toll calls, particularly expensive international calls, for a fee. Then the CLEC disconnects the lines or orders new telephone numbers so the dial-around call charges cannot be billed to the CLEC or collected upon. By switching local telephone numbers, local lines and locations and using different dial around codes, the CLEC often can continue the practice over an extended period.

Office: (404) 649-8983 Fax: (404) 649-8980

DOCUMENT NUMBER-DATE 0 1 3 2 0 FEB 26 2 FPSC-COMMISSION CLEDIN Thank you for your attention to this matter and please to not hesitate to contact me with questions.

Sincerely,

cit,

Douglas C. Nelson