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ORIGINAL

Via Hand Delivery

October 11, 2000

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

Re: Docket No. 001275-TP; In Re: Complaint of Network Telephone Corporation against Sprint – Florida, Inc.; Sprint's Answer.

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and fifteen (15) copies of the Answer of Sprint – Florida, Incorporated.

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

Sincerely,

Charles J. Rehwinkel

CJR/th

Enclosure

- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMP** \_\_\_\_\_
- COM 3 \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG Fordhan \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGD \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- SER \_\_\_\_\_
- OTH msg to Hong \_\_\_\_\_

RECEIVED & FILED

Man  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12936 OCT 11 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Network Telephone  
Corporation against Sprint - Florida, Inc.

Filed: October 11, 2000

Docket No. 001275-TP

ANSWER OF SPRINT-FLORIDA, INCORPORATED

Sprint-Florida, Incorporated ("Sprint") hereby files its Answer to the Complaint filed by Network Telephone Corporation ("NTC") in this matter. Sprint-Florida states as follows:

Respondent is:

Sprint-Florida, Incorporated  
555 Lake Border Drive  
Apopka, Florida 32703

Respondent is represented by:

Charles J. Rehwinkel  
Susan Masterton  
1313 Blair Stone Rd.  
Tallahassee, Florida 32301

Service may be made at the above location.

ANSWER

1. Sprint is without sufficient information to admit or deny Paragraph 1 of the Complaint.
2. Paragraph 2 of the Complaint is admitted.

DOCUMENT NUMBER-DATE

12936 OCT 11 8

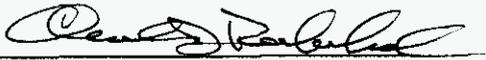
FPSC-RECORDS/REPORTING

3. Paragraph 3 of the Complaint is admitted.
4. Paragraph 4 of the Complaint is admitted inasmuch as the Telecommunications Act of 1996 speaks for itself.
5. Paragraph 5 of the Complaint is admitted inasmuch as each of the various provisions of law speaks for itself; in all other respects, Paragraph 5 of the Complaint is denied.
6. Paragraph 6 of the Complaint is admitted inasmuch as each of the various provisions of law speaks for itself; in all other respects, Paragraph 6 of the Complaint is denied.
7. Paragraph 7 of the Complaint is admitted inasmuch as each of the various provisions of law speaks for itself; in all other respects, Paragraph 7 of the Complaint is denied.
8. Paragraph 8 of the Complaint is admitted inasmuch as each of the various provisions of law and court opinion(s) speaks for itself; in all other respects, Paragraph 8 of the Complaint is denied.
9. Paragraph 9 of the Complaint is admitted inasmuch as each of the various provisions of law and court opinion(s) speaks for itself; in all other respects, Paragraph 9 of the Complaint is denied.
10. Paragraph 10 of the Complaint is admitted.
11. Paragraph 11 of the Complaint is admitted.
12. Paragraph 12 of the Complaint is admitted inasmuch as each of the various provisions of law, including Florida Public Service Commission orders, speaks for itself; in all other respects, Paragraph 12 of the Complaint is denied.
13. Sprint is without sufficient information to admit or deny Paragraph 13 of the Complaint.
14. Sprint admits that NTC has entered into an interconnection/collocation agreement with Sprint. Sprint is without sufficient information to admit or deny the remainder of Paragraph 14 of the Complaint.
15. Sprint is without sufficient information to admit or deny Paragraph 15 of the Complaint.

16. Sprint is without sufficient information to admit or deny Paragraph 16 of the Complaint.
17. Sprint is without sufficient information to admit or deny Paragraph 17 of the Complaint.
18. Paragraph 18 of the Complaint is denied.
19. Paragraph 19 of the Complaint is denied.
20. Sprint is without sufficient information to admit or deny Paragraph 20 of the Complaint.
21. Sprint is without sufficient information to admit or deny Paragraph 21 of the Complaint.
22. Sprint is without sufficient information to admit or deny Paragraph 22 of the Complaint.
23. Paragraph 23 of the Complaint is admitted.
24. Paragraph 24 of the Complaint is admitted except that the last sentence is denied.
25. Sprint is without sufficient information to admit or deny Paragraph 25 of the Complaint.
26. Paragraph 26 of the Complaint is denied.
27. Sprint is without sufficient information to admit or deny Paragraph 27 of the Complaint.
28. Paragraph 28 of the Complaint is denied.
29. Paragraph 29 of the Complaint is denied.
30. Paragraph 30 of the Complaint is denied.
31. Paragraph 31 of the Complaint is denied.
32. The first sentence of Paragraph 32 of the Complaint is admitted; the remainder is denied.

WHEREFORE, in the light of the above, Sprint respectfully requests that the Commission deny the Complaint of Network Telephone Corporation and deny the relief sought therein.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of October 2000.



Charles J. Rehwinkel  
Susan S. Masterton  
Sprint-Florida, Incorporated  
P.O. Box 2214  
MS FLTLHO0107  
Tallahassee, Florida 32316-**2214**

Docket No. 001275-TP  
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 11<sup>th</sup> day of October 2000, to the following:

Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Joseph McGlothlin  
McWhirter, Reeves, et al.  
117 South Gadsden Street  
Tallahassee, FL 32301

Charles J. Beck  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400



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Attorney