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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262
	)	
Price Cap Performance Review for Local Exchange Carriers	)	CC Docket No. 94-1
	)	
Low-Volume Long Distance Users	)	CC Docket No. 99-249
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45

REPLY COMMENTS OF SPRINT CORPORATION

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REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") hereby submits its reply to the comments filed in these matters on November 12, 1999.

SUMMARY AND INTRODUCTION

Sprint is a member of the Coalition for Affordable Local and Long Distance Service ("CALLS")[1], the group that has put forth the proposal being considered herein. As a member of CALLS, Sprint supports the joint comments filed by the plan sponsors on November 12, 1999, as well as the joint reply comments being offered today. However, there are a number of issues addressed in the initial comments to which Sprint wishes to respond individually, as well. First, contrary to the claims of certain commenters, it is both appropriate and necessary to realign common line and local switching cost recovery. Second, it is reasonable and appropriate to freeze caps on traffic sensitive rates once the

[1] Other members of CALLS include AT&T, Bell Atlantic, BellSouth, GTE, and SBC.

target levels are reached. Third, a review of cost and common line rate levels shows that the per-line rate levels under the CALLS plan are reasonable and that fears of rate increases are grossly overstated. Finally, commenters who question the flow-through of access reductions are ignoring history and the competitiveness of the long distance marketplace.

I. THE REALIGNMENT OF LOCAL SWITCHING AND COMMON LINE RECOVERY IN THE CALLS PLAN IS BOTH APPROPRIATE AND NECESSARY.

Historically, the price cap "X" factor has been applied uniformly across each of the price cap baskets resulting in the same annual percentage reductions in the price cap index for all baskets. Uniform application of the X factor ignores the underlying productivity differences in the price cap baskets. There have been a host of technological advances in switching (from analog to digital) and transport (the development of fiber and SONET technology) that result in cost savings and thus higher profitability in these baskets. On the other hand, similar technological changes in the provision of the largely copper loop plant have not occurred. As a consequence, the uniform application of the X factor produces rates for local switching that are well above forward-looking costs, while the common line revenues are close to and in some cases below the interstate-allocated portion of forward-looking loop costs. The plan's proposal to shift 25% of MOU switching costs to common line helps to rectify this unintended distortion in the rates.

MCI WorldCom agrees with this assessment. At pp. 8-9 of its comments in this proceeding, MCI WorldCom notes that it agrees with the CALLS sponsors that there is a reasonable basis for shifting a portion of LEC revenue recovery from local switching rates to the common line. MCI WorldCom goes on to suggest that shifting 25% of local switching revenues to the common line basket and targeting X factor reductions to traffic sensitive

rates until the target rate is achieved (a facet of the plan that is discussed in more detail below) is a reasonable way to address the Commissions' concerns about inflated local switching rates.

Similarly, in comments filed in response to the Commission's recent Further Notice of Proposed Rulemaking regarding access charge reform,[2] the issue of switching costs and the attendant problems created in the blanket application of the X factor were discussed in some detail by several of the commenters. For example, both Bell Atlantic and MCI WorldCom noted that the high rate of return in the traffic-sensitive basket is in large part a function of the Commission's determination to apply the X-factor across the board to all baskets. MCI WorldCom, in particular, questioned this standardized application in light of the fact that "... productivity gains for local switching may have outpaced the gains for other access elements."[3] Similarly, Bell Atlantic reminded the Commission that, from the outset of price cap regulation, the Commission itself recognized that rates of return for various baskets would vary because productivity gains differ.[4] Moreover, Sprint's own research reveals that from 1992 to 1998 the investment in digital switching for all Tier I price cap ILECs has increased from 62% to 89% of total central office switching investment.[5] Clearly, these technological improvements in switching outdistance productivity in other baskets, particularly common line.

The X factor was established using total company information; there was no distinction made with respect to any specific basket or service. There can be no harm in bringing a modicum of reality into the application of the factor to the baskets today. The

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[2] *In the Matter of Access Charge Reform*, CC Docket No. 96-262, Fifth Report and Order and Further Notice of Proposed Rulemaking, (rel. August 27, 1999). Initial comments on the FNPRM were filed October 29, 1999.
[3] *Id.*, MCI WorldCom Comments at p. 13.
[4] *Id.*, Bell Atlantic Comments at n. 5 at p. 11.
[5] Source: ARMIS 43-02, Table B1b, Balance Sheet Accounts (Plant Accounts), lines 2210 and 2212.

CALLS proposal does just that. The Commission should recognize the differences in productivity that have come about due to advances in switching technology and embrace this opportunity to shift 25% of MOU switching costs to the common line basket.

II. IT IS APPROPRIATE TO FREEZE RATE CAPS FOR TRAFFIC SENSITIVE ELEMENTS ONCE THE TARGET LEVELS HAVE BEEN REACHED.

Price cap regulation was introduced in order to create an environment that would more closely replicate the operation of a competitive market than rate of return regulation had in the past. Similarly, the purpose of the X factor was to incent the price cap LECs to be as efficient as possible. In a time when rates were still at monopoly levels, the X factor provided the incentive necessary for the LECs to redefine their networks and operating cost structures in the fashion that a totally market-driven company would. However, as discussed above, because of the uniform application of the X factor, the existing price cap mechanism has not, unfortunately, produced rates reflective of economic costs. The CALLS plan, on the other hand, would supplant the existing price cap mechanism with an aggressive transition to rate levels that reasonably approximate underlying forward looking economic cost. Once rates reflect their forward-looking cost levels, further reductions cannot be achieved unless or until a major technological advancement that alters FLEC comes along. The continued application of a factor based on historic productivity gains on rates that approximate FLEC makes no economic sense; certainly does not replicate the operations of a competitive model; and stands the economic incentives price caps were designed to create on their heads.

Sprint stresses that adopting the CALLS proposal would not preclude the Commission from re-examining costs at the conclusion of the five-year period provided for

in the plan in order to include any efficiency gains realized during the life of the CALLS plan. However, continued application of a subjective factor to a demonstrably cost-based rate will only create economic distortions in the market.

III. THE CURRENT LEVEL OF COMMON LINE REVENUE IS REASONABLE, IF NOT UNDERSTATED.

Certain commenters[6] urge the Commission to reject both the notion of shifting 25% of MOU switching costs to the common line basket, as well as the elimination of the X factor application to the common line services basket. One allegation is that ILECs are currently receiving common line revenues in excess of their economic costs. Consequently, rather than realigning switching and common line recovery, or eliminating the application of the X factor, parties suggest that common line rates should be lowered.

As discussed above, there are no longer valid economic or regulatory reasons for maintaining the status quo with respect to the switching cost and X factor application issues described above. The opposing arguments are based not on economic realities, but rather on some perceived benefits that these parties believe the current regulatory environment provides. As explained herein, those perceived benefits do not, in reality, exist.

Similarly, the current common line revenues being realized by the ILECs are not what at least one of these commenters has represented them to be[7]. The common line revenues of the Sprint local telephone companies *do not* exceed the companies' economic costs. To the contrary, with one exception, Sprint's revenues do not even reach the level of the companies' forward-looking economic costs. Exhibit A to these comments compares

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[6] For example, California Public Utilities Commission at pp. 19-22; Competition Policy Institute at pp. 5-7; New Jersey Division of the Ratepayer Advocate at p. 18; Time Warner at pp. 2 and 6; Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union at pp. 35-36.

[7] See, Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union at pp. 28-29.

the common line revenues generated by Sprint's non-rural LECs with the loop and port costs generated by the Commission's Synthesis Model. (Sprint notes that it has utilized the Synthesis Model here as a test of reasonableness only. Generally, Sprint does not support use of the Synthesis Model for the calculation of access costs beyond the loop and advocates the use of company specific inputs when calculating economic costs for the loop and port.) Column G of this exhibit shows that the loop and port costs for Sprint's non-rural territories, when calculated using the Synthesis Model, using the Commission's default inputs, are greater than current common line revenues. Overall, the revenue is merely 78% of costs. Indeed if one adds the 25% shift to common line recovery that CALLS and Sprint advocate, the percent of revenue to cost is just 83%.

Reducing switching costs, in concert with increasing the subscriber line charge results in a realignment of price with cost. Furthermore, shifting 25% of MOU switching costs to the common line basket will not only bring switching rates down to a level that reasonably approximates FLEC, but will push common line rates toward FLEC. From both an economic and a regulatory perspective, this is the right result. Accordingly, in order to move all access service rates to or near their economic costs, targeting of the X factor to services other than those in the common line basket is clearly warranted.

In addition to the economic justification for the changes proposed in the CALLS plan, Sprint wishes to address concerns raised about the end-user rate impacts of the CALLS plan. Consider first the status quo: today, between the SLC and the PICC, most customers are incurring a monthly charge of at least $5.00. Add to that figure the $.50 increase in the PICC scheduled to take effect next July and the majority of primary residential and single-line business customers will pay a combined rate of $5.50 per month. Finally, when making any comparisons between the status quo and the CALLS proposal, one must remember that

the Commission's current plan is designed to drive flat rate recovery of the full interstate loop cost – thus even the "status quo" will change over time.

It is clear, therefore, that any comparison of the current $3.50 SLC rate with the proposed CALLS rate is a classic apples to oranges comparison. Such an exercise fails to acknowledge the fact that $3.50 is not the only interstate, loop-related charge that customers pay. The CALLS proposal simply recognizes this reality and provides for an initial cap on the SLC of $5.50, which equals the flat rate recovery provided for under the "status quo." This cap rises as is also the case for PICCs under the current rules. A major difference, however is that the CALLS plan places an ultimate cap of $7.00, whereas under current rules, combined SLC and PICC well can exceed $7.00.

Sprint strongly believes that, the majority of customers will never reach the cap (and those who do reside in the areas that are the highest cost areas) and a great many will see *reductions* in their fixed monthly charges, paying less than under the current SLC/PICC rate structure. A review of the effect of CALLS on Sprint's own local customers bears out these projected rate impacts. Those who oppose CALLS are not only opposing sizeable per-minute reductions for all users, but per-line reductions for a significant portion of the population.

Moreover, the CALLS proposal will alleviate the current cross-subsidization that exists between business/non-primary residential and residential customers in the current plan. While the Commission's current plan is designed to eventually balance the recovery between these customer classes, that equalization will not occur any time soon. In fact, the timing of that event cannot be defined, especially for rural areas. The CALLS plan, on the other hand, would quickly narrow the disparity between customer classes and would do so for urban and rural areas alike. Accordingly, to maintain the status quo essentially provides

an incentive to the IXCs to move away from providing service in rural areas[8], where the PICCs will remain high indefinitely, and concentrate instead on urban areas where the PICC rate will more quickly decline. This is certainly not an outcome that the Commission can or should endorse, especially when it has a workable option in the CALLS plan.

IV. THE CALLS PLAN WILL BENEFIT LOW INCOME SUBSCRIBERS

In a somewhat confusing discussion, at page 38 of comments filed by the Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union (Joint Consumer Commenters or "JCC") arguments are adopted from reply comments filed more than two years ago by the Texas Office of Public Utility Counsel.[9] In those earlier comments, the JCC discussed an analysis conducted by Sprint to determine the effects of allowing the rates paid for local service to reflect more accurately the cost of service. This analysis included a potential increase in the subscriber line charge. The JCC claimed (in 1997, and again in their November 12, 1999 comments) that allowing rates to reflect costs, as Sprint suggested, was somehow "regressive" and would cause undue hardship on those who are least able to afford price increases.

The JCC's arguments must be rejected for several reasons. First, the JCC took Sprint's prior comments completely out of context. Contrary to the JCC's assertions, Sprint cannot - nor did it ever attempt to - claim that every customer in every city in every situation will be made better off by allowing rates to reflect costs. What Sprint maintained, both then and now, is the economic fact that, when rates reflect costs, customers benefit overall.

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[8] For example, if the status quo is maintained, by July, 2001 PICC rates in Sprint's Nebraska and Wyoming local territories, both rural in nature, are estimated to go as high as $7.51 for multi-line business customers while non-primary residential PICCs will hover at $4.65 per line.

[9] *In the Matter of Access Charge Reform*, CC Docket No. 96-262, Reply Comments of Texas Office of Public Utility Counsel filed February 14, 1997.

Second, the analysis performed by JCC is seriously flawed. The JCC's conclusion on its alleged regressiveness are based on faulty assumptions regarding the median income of the low-income range. Furthermore, the JCC completely ignored the fact that long distance calling done by low-income households represents a larger portion of their household budget than those with higher incomes – and correspondingly, that there is a relative benefit from price reductions that will be greater for these customers than for those in higher income households. In sum, the conclusions reached by the JCC cannot be supported when properly analyzed and should be rejected.

More important, the CALLS plan clearly recognizes and addresses the needs of low-income users. Its expands Lifeline support to ensure that these consumers would pay no monthly SLC and pay no PICC-related charges. This approach targets only those customers for whom affordability is of greatest concern. By providing universal service support to those who need it most, and at the same time slashing access charges in half, the CALLS plans promises to strengthen subscribership among low-income consumers. Interestingly, in spite of their alleged conclusion that CALLS will harm low-income subscribers, at page 45 of their comments, the JCC *openly admit* that the CALLS proposal would benefit low-income Lifeline consumers, including those with low volumes of long distance use.

In sum, the JCC have provided no rational support for their premise that CALLS will harm consumers.

V. THE COMPETITIVE LONG DISTANCE MARKET WILL ENSURE THE FLOW-THROUGH OF ACCESS REDUCTIONS

In a related issue, arguments have once again surfaced that IXCs will not flow-through to the end user customers savings from access reductions. This argument has been made – and soundly refuted by Sprint and each of the other major IXCs – numerous times. For this reason, Sprint will not engage in a protracted discussion of the issue. It is enough to point to the facts. Sprint has provided irrefutable evidence of its long distance division's continuous price reductions which have, on average, been implemented more quickly than the correspondingly reductions in access charges. For example, in 1998, Sprint's average access cost per minute dropped $0.004 from the previous year. However, Sprint's average revenue per minute dropped twice as much, or $0.008, from the previous year. This trend continues in 1999, as Sprint's average access cost per minutes has dropped $0.01, while its average revenue per minute has dropped 50 percent more to $0.015. Furthermore, Sprint is on record as stating that it will further reduce its prices and simplify its long distance pricing plans as the Commission moves forward to complete access charge reform.[10]

In what is their most dubious criticism of the CALLS plan, the JCC states that the proposal must be rejected because it offers no guarantee of rate reductions. They state that "[T]he claim that the long distance market is sufficiently competitive to compel price decreases is arguable at best." Sprint strongly disagrees with this baseless statement and is encouraged by the fact that the Commission's Chairman William Kennard apparently disagrees as well, as reflected by his recent statement that:

[10] See, Comments of Sprint Communications Company L.P. in *In the Matter of Low Volume Long Distance Users*, CC Docket No. 99-249.

> American consumers are enjoying the lowest long distance rates in history and the lowest Internet rates in the world for one reason: Competition. Competition has produced a price war in the long distance market."[11]

The bottom line of the flow-through issue is, simply stated, that market competition, rather than regulation, may be relied on for the development of the most efficient pricing mechanisms. The history of the long distance market has proven this fact time and again. In this highly competitive market, competitive pressures will force (and have forced) IXCs to set their rates at appropriate levels. Flow-through is, in the end, a non-issue.

[11] Press statement of Chairman Kennard released October 5, 1999.

CONCLUSION

The Commission and the industry have been struggling with access reform, universal service and price cap reform for far too long. These three beacons of federal telephone regulation have become the Bermuda Triangle. The CALLS proposal charts a solid course to a sound and economically rational safe harbor for consumer and competitor alike.

The CALLS proposal will stabilize universal service support and increase Lifeline support, cut per minute interstate access charges in half and simplify consumer bills by consolidating multiple line items into one easily understood charge. It will simplify and stabilize the interstate price cap plan for five years. The plan offers benefits to both residential and business consumers, rural and urban customers, and subscribers in all income levels. For all these reasons, Sprint strongly urges the Commission to adopt the proposal *in toto.*

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December 3, 1999

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 3rd day of December 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing reply comments of Sprint Corporation," In the Matter of the Petition of Access Reform; Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long Distance Users and Federal-State Joint Board on Universal Service, CC Dockets Nos. 96-262, 94-1, 99-249 and 96-45, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

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