

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") hereby submits its replies to the comments on the Petitions for Reconsideration of the Commission's *Ninth Report and Order and Eighteenth Order on Reconsideration*¹ in the above-captioned matter.

Sprint adds its voice to those commenters urging the Commission to deny GTE's Petition for Reconsideration in which it requests that the date by which states must established deaveraged unbundled network element ("UNE") rates be extended until May 1, 2001. GTE suggests that states will not be able to accomplish this task by the current May 1, 2000 deadline, because they must, during this same time frame, work to remove implicit subsidies from local rates and establish explicit, portable intrastate universal service mechanisms (GTE at p.1). In order to provide the states sufficient time in which to manage all of these tasks, GTE asks that the Commission stay 47 C.F.R. 51.507(f) until at least May of 2001.

Sprint joins AT&T in urging the Commission to deny GTE's request. If local competition is ever to truly take hold, it is imperative that UNE deaveraging at long last become a reality. While GTE is correct that the states have a great deal on their plates at the

¹ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Ninth Report and Order and Eighteenth Order on Reconsideration rel. November 2, 1999. ("*Ninth Report and Order*).

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present moment, it is also true that state regulators have been acutely aware of the fact that establishing deaveraged UNE rates was an imminent task. Rule 51.507(f) was promulgated as part of the Commission's original *Local Competition Order*². While the rule was stayed pending judicial review of that order, that stay was lifted in January 1999. In May of 1999, the Commission stayed Rule 51.507(f), in order to allow the states additional time in which to bring their individual state rules into compliance with the Commission's Section 251 pricing rules. It was made clear, however, that once the stay was lifted, the states would have six months in which to finalize and implement deaveraged UNE rates. Consequently, once the stay was lifted in the context of the *Ninth Report and Order*, the states could not have been in any way surprised by the assignment at hand. Moreover, it must be remembered that there was never a prohibition against the states engaging in UNE deaveraging proceedings during the stay period.

In light of these facts, Sprint believes it is appropriate for the Commission to maintain the schedule set forth in the *Ninth Report and Order* and require UNE deaveraging to be accomplished by no later than May 1, 2000. The Commission has provided a waiver process for those states that find themselves unable to meet that deadline. That process

² See, *In the Matter of the Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Report and Order, 11 FCC Rcd 15499 (1996).

should take care of the concerns expressed by GTE about the alleged burden the May 1, 2000 date may place upon certain state regulators.

Respectfully submitted,
SPRINT CORPORATION

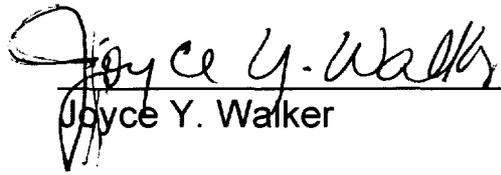
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February 17, 2000

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 17th day of February, 2000, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing letter, "In the Matter of Federal-State Joint Board on Universal Service", CC Docket No. 96-45, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.



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