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April 17, 2001

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: EX PARTE PRESENTATION  
CC Docket No. 99-68

Dear Ms. Salas:

Pete Sywenki and I, on behalf of Sprint Corporation, met with Glenn Reynolds and Tamara Preiss of the Common Carrier Bureau on April 16, 2001, to discuss the *ex parte* letter filed in the above-referenced docket earlier that day, in which Sprint opposed inclusion of a growth cap in the order being considered by the Commission. Sprint explained that a growth cap was unwarranted. Furthermore, if such a cap were based on each CLEC's volume of traffic, the ILEC would pay different rates to various CLECs for ISP-bound calls, based purely on the happenstance of the historical traffic bases and modes of operation of the different CLECs, a discrimination that Sprint believes is arbitrary and unjustifiable. Sprint argued that if the Commission believed that an overall cap on ILEC payments to CLECs for such traffic was warranted and justifiable, a far more direct approach would be to adjust the rates payable uniformly to all such CLECs to reflect the desired cap. During the meeting, the attached chart, illustrating one possible way the ILEC payments could be capped in a nondiscriminatory fashion, was discussed with the staff. In essence, the Commission could determine the total amount of money it is willing to have ILECs pay, and calculate the unit rate per minute based upon the estimated amount of traffic. Any underpayments or overpayments due to differences between experienced and projected growth in traffic could be reflected in calculating the rate to be charged the following year.

This letter is being filed electronically.

Respectfully submitted,

Attachment

cc: Glenn Reynolds  
Tamara Preiss

<b>SPRINT PROPOSAL</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
<b>PRIOR YEAR ILEC PAYMENTS</b>	\$ 807,996,952	\$ 925,000,000	\$ 800,000,000	\$ 1,100,000,000
<b>PAYMENT CAP</b>	10%	10%	10%	10%
<b>CURRENT YEAR PAYMENT CAP</b>	\$ 888,796,647	\$ 977,676,312	\$ 1,035,620,255	\$ 1,294,802,536
<b>MINUS : PRIOR YEAR PAYMENT CREDIT</b>	\$ -	\$ 36,203,353	\$ (141,472,959)	\$ (77,093,215)
<b>ADJUSTED PAYMENT CAP</b>	\$ 888,796,647	\$ 941,472,959	\$ 1,177,093,215	\$ 1,371,895,751
<b>PRIOR YEAR MINUTES GROWTH</b>	22%	27%	4%	14%
<b>ESTIMATED CURRENT YEAR MINUTES</b>	1,408,223,259,337	1,788,012,987,013	1,853,585,552,388	2,113,266,630,539
<b>PRIOR YEAR RATE</b>	\$ 0.00070	\$ 0.00063	\$ 0.00053	\$ 0.00064
<b>CURRENT YEAR RATE</b>	\$ 0.00063	\$ 0.00053	\$ 0.00064	\$ 0.00065
<b>ESTIMATED CURRENT YEAR REVENUES</b>	\$ 888,796,647	\$ 941,472,959	\$ 1,177,093,215	\$ 1,371,895,751
<b>ACTUAL PAYMENTS</b>	\$ 925,000,000	\$ 800,000,000	\$ 1,100,000,000	\$ 1,200,000,000
<b>ACTUAL MINUTES OF USE</b>	1,465,584,415,584	1,519,332,419,990	1,732,185,762,737	1,848,478,614,858
<b>ACTUAL MINUTE OF USE GROWTH RATE</b>	27%	4%	14%	7%