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May 8, 2002

*Via Electronic Mail Delivery*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-B-204  
Washington, D.C. 20554

**Re: *Written Ex Parte Communication***  
*BellSouth Section 271 Application Regarding Georgia and Louisiana,*  
*CC Docket No. 02-35*

Dear Ms. Dortch:

The purpose of this letter is to advise the Commission that Sprint Corporation (on behalf of its Wireless Division) plans to file with the Commission tomorrow, May 9, 2002, a Petition for Declaratory Ruling regarding one of the issues that has been raised in the above-captioned proceeding. By this letter, Sprint asks the Commission to consider this issue in connection with Sprint's Petition, rather than in the context of CC Docket No. 02-35.

The Commission commenced Docket No. 02-35 to consider BellSouth's application for Section 271 relief in the States of Georgia and Louisiana. On March 4, 2002, Nextel Communications and Triton PCS filed opposition comments addressing BellSouth's policy regarding activation of NPA-NXX codes with rate centers in non-BellSouth service areas. In response, BellSouth claimed that the challenged activity raised significant legal questions under its state tariffs. Sprint disagrees with BellSouth's characterization.

The issue Sprint raises in its Petition for a Declaratory Ruling, and raised by Nextel and Triton in their opposition comments, affects telecommunications carriers in all states where BellSouth provides local exchange services. The issue is not limited to the two states of Georgia and Louisiana. Sprint therefore believes that its Petition will provide a proper vehicle for the Commission to address the lawfulness of BellSouth's activities, and will provide affected parties a meaningful opportunity to address this important issue affecting interconnection in BellSouth territory. This procedure would also facilitate the Commission's ability to understand the facts and the consequences of BellSouth's new policy, thereby enabling it to make a more informed decision.

Based on the foregoing, Sprint respectfully requests the Commission to defer its decision on BellSouth's policy regarding activation of NPA-NXX codes with non-BellSouth rate centers to its consideration of the Sprint Petition for Declaratory Ruling.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, one copy of this letter is being filed with your office electronically. Please associate this letter with the file in the above-captioned proceeding.

Respectfully submitted,

**SPRINT CORPORATION**  
**(on behalf of its Wireless Division)**

A large, stylized handwritten signature in black ink, appearing to read 'Luisa L. Lancetti', is written over a horizontal line. The signature is highly decorative with loops and flourishes.

Luisa L. Lancetti  
Vice President, PCS Regulatory Affairs  
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